



26 June 2026

Independent Planning Commission NSW (IPCN)
Level 3, 201 Elizabeth Street,
Sydney NSW 2000

Re: SSD-63475709 - Mingara Recreation Club Seniors Housing, Tumby Umbi. Supplementary Submission: Correcting Methodological Assumptions Raised at the Public Hearing, and Request for a New Regional Athletics Facility on the Central Coast

Dear Commissioners,

On Monday 22 June 2026 I addressed the Commission on behalf of NSW Athletics regarding the impact of this proposal on the Mingara Regional Athletics Centre. I am writing now to supplement that submission, following a further public session held earlier this week at which the Applicant outlined the methodology underpinning its parking and traffic case.

Two of the assumptions underlying that methodology are, in our assessment, materially incorrect, and are corrected in Sections 1 and 2 below. More fundamentally, we believe the changes proposed by this development, set out in Section 3, will irrecoverably change the utilisation profile of the Mingara Regional Athletics Centre and, over time, its long-term viability as a regional sporting venue.

For that reason, our conclusion below sets out what we consider the most appropriate alternate solution: a new, purpose-built regional athletics facility elsewhere on the Central Coast, funded by the NSW Government, so that the sport and the community that depends on it are not materially disadvantaged as a result of this development.

1. The Venue Does Not Host “Five Carnivals” a Year

At the public session, the Applicant's transport methodology was presented on the basis that the Regional Athletics Centre hosts approximately five carnivals per year. This figure significantly understates actual usage and, if left uncorrected, would materially invalidate any parking or traffic assessment built upon it.

Based on the Mingara Athletic Club's own records (set out in its response to Amendment Report 2, February 2025) and NSW Athletics' regional data, the venue's actual annual usage includes:

- 225 athletics and school carnival bookings recorded in 2025 alone;
- Weekly Friday night summer club competitions, involving 670 registered athletics members, run across the full summer season;
- Year-round training on Tuesday, Wednesday and Thursday afternoons/evenings;



- Regional carnivals and championships of one to two days' duration, drawing up to 1,500 athletes and spectators (most recently, February 2026);
- The Central Coast Zone Athletics carnival, involving 2,127 members and supporters.

On any reasonable reading, the venue hosts several hundred discrete competition and carnival bookings each year - not five. This is not a marginal rounding error. It significantly understates real utilisation, and it follows that any peak-demand or parking-adequacy modelling built on the "five carnival" assumption cannot be relied upon by the Commission.

2. Event/Parking Management Plans Are Not a Practical Substitute for Fixed Parking

The Applicant also submitted that an Event Traffic Management Plan (ETMP), to be developed and implemented by the schools, clubs and volunteer user groups who hire the venue, is a practical and sufficient substitute for the approximately 300 established adjacent overflow parking spaces proposed to be permanently removed.

This assumption has already been tested, and rejected, by the athletics community in its written response to Amendment Report 2 (Mingara Athletic Track Committee, February 2025), which states plainly:

"An ETMP manages traffic flow. It does not create capacity... [It] requires the schools and club events, who pay to hire the facility, to manage parking and buses, this is unrealistic and unworkable for teachers and volunteers."

That assessment reflects operational reality, not preference. It is not a reasonable expectation that a schoolteacher running a single annual carnival, or a volunteer committee member coordinating a Friday night club competition, will develop and execute a professional-grade traffic and parking management plan, marshalling vehicles, staggering buses and resolving overflow, week after week, indefinitely, as an unpaid condition of using a public facility. This is materially different from a commercial event organiser engaged for a one-off function.

Even where a club or school attempts this, an ETMP cannot increase the number of physical parking spaces available. It can only direct where existing demand queues or diverts, which does not resolve a genuine shortfall, it relocates the resulting congestion, including onto surrounding residential streets, a risk Council has separately and specifically warned against.

The Commission should not accept volunteer-administered management plans as a like-for-like substitute for permanent, adjacent, fit-for-purpose parking infrastructure.

3. The Parking Loss Is Irreversible, and the Consequences Compound

Finally, we ask the Commission to weigh one further point squarely: the loss of the established adjacent overflow parking is not a reversible planning condition that can be revisited if it proves inadequate. Once that land is built upon, reinstating equivalent adjacent capacity becomes physically and financially impossible.

That irreversibility matters because its effects compound in one direction only. Reduced, relocated parking will progressively reduce accessibility for the families, school groups and disabled athletes who depend on close, reliable parking to attend at all, a point addressed in detail in our oral submission of 22 June regarding the disproportionate parking demand generated by athletics events.

Reduced accessibility will, over time, reduce venue utilisation, as coaches, schools and clubs redirect carnivals and training to venues offering dependable parking, a risk the Club itself has already flagged, noting that coaches have indicated they will reconsider their involvement if adjacent parking is removed. Reduced utilisation, in turn, directly threatens the operational viability of a Regional Athletics Centre that the NSW Athletics Facilities Strategy (June 2026) confirms as one of only four Hub-certified synthetic tracks in the entire Central Coast/Hunter region, serving 169,810 enrolled students, the largest non-metropolitan student population of any region in the state.

Irreversible parking loss, reduced accessibility, reduced utilisation and declining operational viability form a single causal chain. None of these consequences can be remedied retrospectively once the housing is built.

We ask the Commission to treat this irreversibility as a primary, not secondary, planning consideration.

It is precisely because these consequences cannot be remedied retrospectively that we believe incremental management conditions at this site are insufficient, and that the development of a new, purpose-built facility elsewhere on the Central Coast, set out in our conclusion below, is the most appropriate way to protect the sport's future.

Attachments

- NSW Athletics Facilities Strategy, June 2026 (Final)
- NSW Athletics Region 2 — Central Coast/Hunter Regional Summary
- Recommended Instrument of Consent, SSD-63475709 (for reference)

Conclusion and Request: A New, Purpose-Built Regional Athletics Facility for the Central Coast

We understand that the project has now been approved by the State, subject to conditions set out in the Recommended Instrument of Consent (attached for reference, and available together with the full project record via the [NSW Planning Portal](#)). We are aware that the terms of that consent raise further, more detailed concerns, which we understand are being represented separately by the Mingara Athletic Club and other directly affected stakeholders, and we do not duplicate that analysis here.

Put plainly: should this development proceed as proposed, it will, in our assessment, irrevocably change the utilisation profile of the Mingara Regional Athletics Centre and ultimately render the venue unsuitable for the volume and type of use it currently sustains. We do not believe this outcome can be avoided through management conditions alone, and we ask the Commission and the State to consider, as a genuine alternative, the path set out below.

Because the project has been approved by the State with conditions, and because the resulting loss of capacity at this site is, in our assessment, irreversible, we believe the most appropriate alternate solution is the development of a new, purpose-built regional athletics facility elsewhere on the Central Coast.

We ask that the NSW Government commit to identifying a suitable site and funding the design and construction of such a facility, to a standard and capacity at least equivalent to the current Mingara Regional Athletics Centre, including World Athletics-classified synthetic track and field infrastructure capable of hosting the carnival, club and school program currently delivered at Mingara.

We see this as a constructive outcome for all parties, not merely a request for compensation.

A new facility would resolve, rather than manage, the conflict between the proposed seniors housing and the athletics community's parking and access needs. It would also free up the land currently occupied by the Mingara Regional Athletics Centre, which may be of further value to the Mingara Recreation Club and the Applicant in their own right.

We would welcome the opportunity to engage directly with the NSW Government and Central Coast Council to progress this option, including site selection, funding, staging and timing, so that the sport, and the schools, clubs and families who rely on it, are not displaced before a fit-for-purpose replacement is operational.

We make this request in the same spirit as our oral and written submissions: not in opposition to seniors housing at Mingara, but to ensure that the loss of this site's athletics infrastructure does not come at the cost of the sport and the thousands of athletes, students and families across the Central Coast who depend on it.

Thank you for your consideration. I am happy to provide any further information the Commission requires.

Yours sincerely,



Christian Renford
Chief Executive Officer

cc:

Minister for Sport: The Hon. Stephen Kamper MP
Minister for Planning: The Hon. Paul Scully MP
Mayor of Central Coast Council Lawrie McKinna,