



Central Coast Council

Draft LSPS

UDIA Response

June 2020

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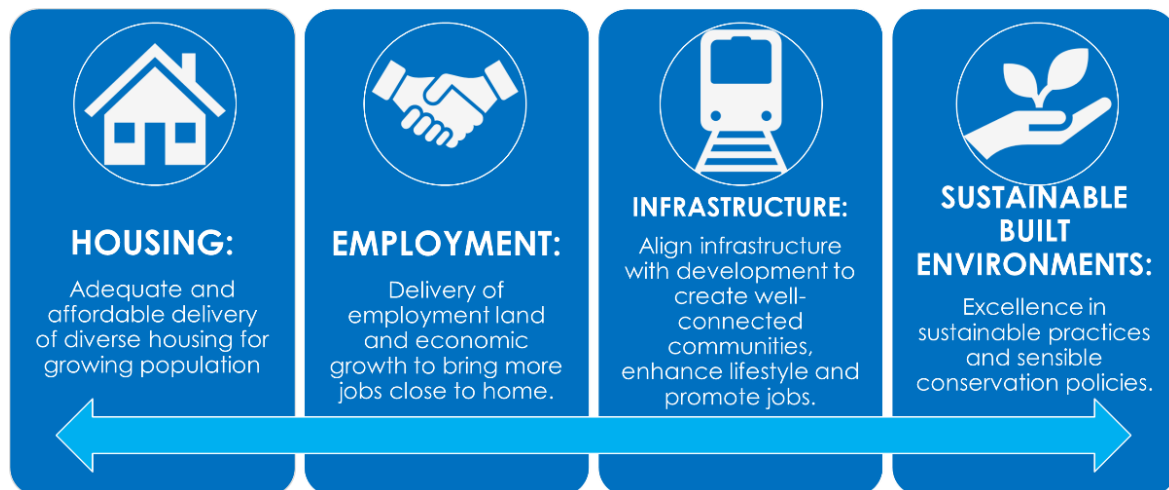
ABOUT THE UDIA

Established in 1963, the Urban Development Institute of Australia is the leading industry group representing the property development sector. Our 500 member companies in NSW include developers, engineers, consultants, local government including Central Coast Council, and utilities. Our advocacy is focussed on developing liveable, affordable and connected cities.

INTRODUCTION

The Urban Development Institute of Australia – NSW Division (UDIA) welcomes the opportunity to provide a submission into the exhibition of the Draft Central Coast Local Strategic Planning Statement (DLSPS).

Advocacy by the Central Coast Chapter of UDIA NSW is guided by our Four Pillars for Growth, being the delivery of housing, employment, infrastructure, and sustainable development in the region. Our submission is provided within this context and organised along these themes.



This submission highlights the key issues that we have raised over ongoing consultation on behalf of our members which includes a range of major developers operating within the Central Coast.

UDIA makes the following recommendations to Council to improve the DLSPS:

1. **Align the LSPS time horizon with the Central Coast Regional Plan 2036.**
2. **Deliver the LSPS concurrent with the Local Housing Strategy. If they are delivered separately, then the LSPS should contain an Action to review the LSPS upon the adoption of the Local Housing Strategy.**
3. **Clearly state the LSPS monitoring and review schedule in the final document. LSPS Actions should be updated annually in the Operational Plan; the LSPS should be reviewed upon the completion of the LHS; and the LSPS should be reviewed on an ongoing basis concurrent with the CSP's Delivery Program.**
4. **Prior to adoption of the final LSPS, provide a summary to the community of those changes made to the exhibited DLSPS as a result of submissions.**
5. **Add Tuggerah as the third Regional Gateway.**

6. Ensure consistency and accuracy in housing forecast analysis.
7. Strengthen the commitment to diverse housing for seniors.
8. Provide flexibility in planning controls to encourage housing diversity.
9. Adopt a merit-based approach to planning proposals and set out a clear approach for additional development sites.
10. Include a Short-term Action to investigate the blockages for, and undertake necessary actions to unlock the WEZ and industrial lands at Somersby.
11. Identify the importance of the Warnervale airport in the final LSPS and incorporate the Warnervale aviation precinct into future planning.
12. Expand the list of Key Enabling Projects to include infrastructure to support the WEZ, Wyong Education and Business Precinct and aviation precinct.
13. Collaborate with industry to address current infrastructure needs and prioritise investment from developer contributions currently held as restricted assets.
14. Proceed cautiously and collaborate closely with industry in the development of the Biodiversity Strategy and take a regional approach to biodiversity conservation.
15. Expand the Natural Assets mapping to include National Parks, State Conservation Areas and appropriately zoned areas.
16. Avoid duplication of effort and cost by using incentives to encourage private sector uptake of existing sustainability standards and practices.
17. Establish a Central Coast Urban Development Program to monitor and support growth of housing and employment land, with clear accountabilities in partnership with industry.
18. Engage early with industry on the Future Regional Transport Plan to ensure support for housing and employment growth, and more expansively consider the existing train line and potential for ferry services.

GENERAL COMMENTS: STRATEGIC PLANNING ALIGNMENT

UDIA congratulates Central Coast Council (Council) on the release of its DLSPS and commends Council for articulating its Vision for the Central Coast of tomorrow.

The Central Coast local government area (LGA) is critical to achieving the objectives of the Central Coast Regional Plan (CCRP) 2036. We commend Council for recognising the importance of aligning its objectives with the CCRP and Community Strategic Plan and placing the DLPS within their context.

We note that the various other strategic plans to which the LSPS relates, including the CCRP and Community Strategic Plan (CSP: *One - Central Coast 2018*) have different time horizons, ranging from 2040, 2036 and 2028. This inconsistency makes it challenging for the community and industry to gauge how the plans integrate and what successful implementation of plans will look like. We are urging all councils to align their LSPSs and Housing Strategies with the timing of the Regional Plan being 2036.

Recommendation 1: *The LSPS should align its time horizon with the Central Coast Regional Plan 2036.*

Alignment with Local Housing Strategy

UDIA notes Council's plan to deliver a Local Housing Strategy (LHS) in the Short term, i.e. by 2023. We welcome that commitment and look forward to engaging with Council in the development of the LHS. The LHS is critical to the achievement of the Central Coast's growth vision.

UDIA believes that the LSPS and the Local Housing Strategy should be delivered concurrently in every local government area. If they are not delivered together, then a formal LSPS review should be undertaken once the Local Housing Strategy is adopted. This immediate review to incorporate the outcomes of the LHS into the LSPS should be included explicitly as an additional Action in the LSPS.

Without a robust evidence from the Local Housing Strategy, the LSPS unfortunately will not offer adequately meaningful information to residents or developers about where housing is likely to occur or what form it is likely to take. For example, the DLSPS articulates an intention for greater density in planned greenfield urban release areas but does not provide clarity on how that may be achieved. Presumably the LHS will provide the detail on that question and others; however, for now many questions remain about how the LSPS vision will be achieved.

Given the LSPS will carry statutory weight, UDIA strongly recommends that Council provides clarity in its Local Housing Strategy and then review the LSPS accordingly. A formal review should be written into the LSPS to ensure this happens.

***Recommendation 2:** The LSPS should be delivered concurrent with the Local Housing Strategy. If they are delivered separately, then the LSPS should contain an Action to review the LSPS upon the adoption of the Local Housing Strategy.*

Monitoring and Review

A clear vision and integrated planning are imperative to support growth on the Central Coast, and regular monitoring and review of Council's plans are critical to the successful coordination of the region's growth. The Local Strategic Planning Statement will guide Council's actions and sets expectations for the community and the private sector. Investment decisions will be informed by the LSPS, and it is important that the LSPS is reviewed regularly and transparently in order to provide for the successful coordination of growth on the Central Coast.

The DLSPS is silent on the issue of monitoring and review.

We urge Council to articulate how the LSPS planning priorities and actions will be progressively reviewed and updated. We support the utilisation of Council's existing Integrated Planning & Reporting Framework to monitor the implementation of the LSPS. We strongly encourage Council to commit to a specific ongoing formal monitoring review schedule. UDIA recommends:

- Review the LSPS Actions every year and incorporate updates into Council's annual Operational Plan;
- Incorporate the outcomes of the Local Housing Strategy into the LSPS, either by delivering both documents concurrently, or by reviewing the LSPS as soon as the Local Housing Strategy is adopted; and
- Formally review the LSPS every 4 years concurrent with review of the Community Strategic Plan's Delivery Program.

We note several significant Actions in the DLSPS for the Immediate/Ongoing or Short Term, including the development and/or finalisation of:

- Central Coast Local Housing Strategy (LHS)
- Consolidated LEP and DCP
- Comprehensive LEP and DCP
- Centres Hierarchy and Strategy
- Gosford Streetscape Masterplan
- Heritage Interpretation Plan for Gosford City Centre
- Somersby to Erina Growth Corridor Strategy
- Tuggerah to Wyong Growth Corridor Strategy
- Greater Warnervale Structure Plan

- Strategic and Town Centre development capacities
- Car parking strategies for corridors
- Wyong Town Centre Precinct Plan
- Lake Munmorah Structure Plan
- Local character assessments across the LGA
- Active Lifestyles Strategy
- Nature-based Recreation Strategy
- Central Coast Community Facilities Strategy
- Central Coast Cultural Plan
- Central Coast Heritage Strategy
- Waste Strategy
- Place-Based Climate Action Plans
- Disaster Resilience Strategy
- Central Coast Biodiversity Strategy
- Environmental Lands Review
- Greener Places Strategy
- Rural Lands Study and Strategy
- Investigate suitability for urban development in rural land
- Central Coast Future Transport Regional Plan
- Asset Management Strategy
- Review Servicing and Infrastructure Capacity in planned growth areas
- Central Coast Waste Avoidance and Resource Recovery Strategy

UDIA commends Council for these planned deliverables and we eagerly anticipate the opportunity to engage with Council in the development of all these plans. Each of these will provide important insights to help shape the planning of the Central Coast's future. They will also provide signals to the development industry which will inform private investment decisions which could impact on the delivery of the Central Coast's community and economic goals.

Given their influence and the fact that the LSPS will carry statutory weight, the outcomes of these Immediate and Short-Term Actions should be considered in an early review of the LSPS.

Council's monitoring and review schedule should be spelled out in the final document.

Recommendation 3: *The LSPS monitoring and review schedule should be clearly stated in the final document. LSPS Actions should be updated annually in the Operational Plan; the LSPS should be reviewed upon the completion of the LHS; the LSPS should be reviewed on an ongoing basis concurrent with the CSP's Delivery Program.*

UDIA also requests that prior to adoption of the final LSPS, a summary of those changes made to the exhibited DLSPS as a result of submissions be publicly provided.

***Recommendation 4:** Prior to adoption of the final LSPS, provide a summary to the community of those changes made to the exhibited DLSPS as a result of submissions.*

CENTRES AND CORRIDORS

Tuggerah

The DLSPS Spatial Plan identifies two Regional Gateways, being Somersby in the south and Warnervale in the north. UDIA proposes that the Central Coast has three Regional Gateways, with the addition of Tuggerah at the M1 interchange in the middle.

Tuggerah is situated at the approximate geographic centre of the Coast and provides access to the majority of the population, businesses and key facilities within a 25 km radius. Tuggerah's proximity to the M1, the Pacific Highway and the train line add to its strategic position and we envision it could also become a civic hub for the Central Coast. Tuggerah's strategic importance is supported in the Central Coast Regional Plan 2036 as the beginning of the Northern Growth Corridor.

The former Wyong Shire Council saw the importance of the Tuggerah Gateway and planned and delivered dual carriageway roads in both directions from the M1 to Shelly Beach. Along this corridor and within the first 2.5 km are three Key Enabling Projects, being the Central Coast Regional Sporting Complex, the emerging Tuggerah Transit-Oriented Development (TOD), and the regional Westfield shopping complex.

In its Priorities for Tuggerah, the DLSPS states that Council will "Focus on supporting growth and investment of the Tuggerah Business Park, Tuggerah Straight, Mardi, Wyong, Wyong North and Watanobbi stimulating further growth and economic development within these planned areas." While recognising that these areas are already zoned and developed, UDIA nonetheless commends Council for recognising the importance of supporting these areas and their potential for additional development. Likewise, we support the Priority to "Encourage and support colocation of business and technology related services close to regional road and rail transport in Wyong and Tuggerah", and encourage Council to support the full potential of TODs.

Tuggerah provides access to the central part of the Central Coast and should be recognised in Council's LSPS (and the next CCRP) accordingly.

***Recommendation 5:** Add Tuggerah as the third Regional Gateway.*

HOUSING

The Central Coast Regional Plan 2036 forecast that approximately 41,500 new dwellings were required to accommodate the expected growth of over 75,500 people by 2036. In 2019 the Department of Planning released updated population projections, adding another 14,350 persons, taking the growth for the 25-year period (2016–41) to just over 95,000 new residents.

We encourage Council to closely monitor external influences to the Coast such as the growth of the Sydney and Greater Newcastle metropolitan regions, with improvements to key transport infrastructure including Northconnex and faster inter-city trains. There is no doubt that these external influences will continue to keep upward pressure on housing demand on the Coast. The final LSPS should remain flexible to accommodate the projected population increases beyond the immediate planning horizon. Accordingly, we refer to our recommendation above to regularly monitor, review and update the LSPS.

Earlier versions of Regional Strategies (e.g., *Central Coast Regional Strategy 2008*) contained a table identifying where new housing development would likely occur - whether “Regional”, “Major” or other centres; and infill development or greenfield release areas. We encourage Council to utilise such a table to ensure that future housing needs match supply and infrastructure in identified precincts.

Housing forecast analysis

UDIA appreciates the work to try to forecast the percentage change in expected housing development on the Housing Forecast map on pages 80/81. Unfortunately, the map is too generalised to provide meaningful information and does not give an accurate representation of future housing growth over the 20 years to 2036 due to some errors and inconsistencies.

For example, the housing forecast figure on pages 80/81 includes:

- land at Halloran and Bushells Ridge Rd zoned employment land;
- land at Lake Munmorah forming part of the Munmorah State Conservation Area; and
- land south of Toukley zoned as National Park

There is also a low-range forecast for increased housing on the southern end of the Coast (The Peninsula), whereas Council’s earlier Peninsula Urban Direction Strategy (PUDS) had forecast up to 7,500 more people within this area and supporting town centres.

The above points create inconsistencies with the Housing Precinct Plans shown on pages 82/83, and “The Regions 10-Year Growth Trend” shown on pages 28/29.

Recommendation 6: *Ensure consistency and accuracy in housing forecast analysis.*

Seniors Living

UDIA encourages Council to recognise that alternate forms of housing such as retirement villages and manufactured home estates/land lease communities are becoming increasingly popular, particularly with our ageing population and as a form of affordable housing. Such developments typically require larger land areas (exceeding 3 ha and more likely 10ha) to be able to provide the internal facilities efficiently and sustainably for their communities. The Central Coast is already suffering a limited supply of suitable land for seniors living because of current environmental zonings in the former Gosford LGA, topographical challenges, or proximity to services.

We urge Council to consider the land use needs of this growing sector as it plans to accommodate up to 92,000 people to 2041. Whilst it is acknowledged that some supply will be delivered in vertical villages within planned centres, seniors housing preferences are broad, and Council should accommodate diversity for the seniors housing market. Failure to provide sufficient opportunity across the Coast will likely exacerbate the current trend where retiring persons are forced to look at adjoining LGAs for their low-density housing needs.

UDIA has previously made submissions to Council on urban growth strategies and has identified alternate areas for further investigation for seniors living including land north of Bay Village, Bateau Bay, east of the West Gosford shopping Village and Erina Valley. These precincts are located central to shopping, recreation and transport facilities. UDIA urges Council to reconsider these additional urban growth opportunities.

Recommendation 7: Strengthen the commitment to diverse housing for seniors.

Encourage Genuine Housing Diversity

UDIA commends Council's recognition of the importance of increasing housing diversity into the future. We recognise that there is a strong focus on supporting a range of housing types.

The DLSPS references increasing housing density, particularly around major centres and town centres. UDIA believes there is a role for increasing density in other areas to allow development of more compact and affordable townhouse-style dwellings for all residential areas, including low rise medium density in residential areas around local centres. This would allow further consolidation of development and help limit sprawl.

The finalised LSPS should consider the changing nature of living, particularly the shift toward higher density and long-term renting. There should be greater flexibility in the planning controls to enable build-to-rent, co-living and other alternate housing models to emerge, with the flexibility to provide quality liveability outcomes that are separate to that in an ADG compliant build-to-sell apartment.

Recommendation 8: Provide flexibility in planning controls to encourage housing diversity and a range of new housing typologies.

Flexibility in the Planning System

There are broader economic pressures that may result in housing and employment targets not being met. For residential developers particularly, pre-sales have been a challenge over the past twelve to eighteen months, with growing uncertainty in the marketplace, exacerbated by the impacts of COVID-19. UDIA believes that the market needs some stimulus of forward supply, as the market slows relative to the previous decade.

Given the mixed-picture for forward market performance UDIA recommends caution in relation to assuming supply will continue to be delivered at the same high-watermark level experienced over the last few years and encourages a supportive approach to housing delivery, to also enable local jobs.

The planning priorities outlined in the DLSPS will inform Council's development of both the consolidated and comprehensive local environmental plan (LEP) and development control plan (DCP); and planning proposals must indicate whether the proposed LEP will give effect to the LSPS. Whether a planning proposal respects the LSPS will become a relevant consideration for the Minister in determining if a planning proposal has the strategic merit to proceed past the gateway process. While the LSPS does not contain detailed technical planning controls it will clarify the future character of an area and with it, compatible and incompatible uses.

We recognise that the Department of Planning increased the Strategic Merit Test requiring proposals to be consistent with any endorsed local strategy.

UDIA encourages the development of principles to guide site specific proposals. We believe a contextual assessment of a proposal that also considers the economic context and ability to meet targets is required as part of the assessment of site-specific proposals.

Recommendation 9: Adopt a merit-based approach to planning proposals and set out a clear approach for additional sites.

EMPLOYMENT: ECONOMICS

The DLSPS and Central Coast Regional Plan forecast that the Coast requires 24,674 new jobs to 2036. The Premier labelled the Central Coast “NSW’s fastest growing corridor” and called for a 25,000 jobs boost in her speech at the CEDA economic forum in November 2019. To achieve these growth projections, major employment areas on the Coast need greater support to deliver on their potential.

UDIA commends Council for identifying the importance of the southern and northern Growth Corridors; however, it must be noted that industry is already facing enormous challenges delivering large-scale developments upon zoned industrial land in both corridors.

In the case of Somersby, much of the zoned industrial land is constrained by threatened species, riparian corridors, and culturally significant sites. In the case of the Wyong Employment Zone (WEZ), this land has been zoned for over 12 years yet has failed to materialise as a key employment precinct, due to challenges such as ecology/biodiversity security and a lack of key infrastructure.

UDIA believes the final LSPS should identify the proposed greater Somersby Employment lands, located immediately north of the existing Somersby Industrial Estate. This future growth area was identified by Council in September 2018 as contributing to 8,000 additional jobs for this area, yet Council support seems to have waned for reasons that are unclear to industry. We encourage Council to reinvestigate the potential for this land and consider historic and current uses (agriculture and rural lifestyle respectively) against the growing need/opportunity to provide suitable employment lands located close to M1 connections and external markets.

The DLSPS includes the following Economic Planning Priority on page 86 which we support:

Facilitate Emerging Logistics, Warehousing, Manufacturing and Innovative Enterprises

We point out that logistics warehousing and manufacturing typically require quite a large development footprint. This is already proving challenging on the Central Coast. Future policies should consider that balance between targeted employment land and the realities of ecology, heritage, infrastructure, and other challenges faced at a Development Application (DA) stage, which are currently impeding development at both Somersby and the WEZ.

Recommendation 10: *Include a Short-term Action to investigate the blockages for, and undertake necessary actions to unlock the WEZ and industrial lands at Somersby.*

Warnervale Airport

The DLSPS highlights on page 27, under “What We’ve Heard So Far”, that the community wants Council to “Plan for and support Warnervale Airport”. However, there is no further reference to Warnervale Airport in the DLSPS, including no reference on pages 90/91 which list the “Key Enabling Projects”.

UDIA considers the Warnervale/Central Coast Airport a significant and valuable asset for the Coast, providing opportunity for growth in the aviation sector and taking advantage of changes in technology including drones and electrically powered aircraft. UDIA urges Council to identify the importance of the airport in the final LSPS and to incorporate the Warnervale aviation precinct into future planning.

***Recommendation 11:** Identify the importance of the Warnervale airport in the final LSPS and incorporate the Warnervale aviation precinct into future planning.*

Key Enabling Projects

UDIA believes that the list of Key Enabling Projects on page 90 is incomplete. This list of 15 items should include additional critical infrastructure to support the already zoned Wyong Employment Zone (which lacks biodiversity security and key infrastructure), and the potential for a growing aviation precinct located within the WEZ.

We also note that the DLSPS neglects to mention any plan for support of the Wyong Education & Business Precinct at Warnervale, located adjacent to the WEZ and Warnervale Train Station. We recommend that this important project be incorporated.

***Recommendation 12:** Expand the list of Key Enabling Projects to include additional infrastructure to support the WEZ, Wyong Education and Business Precinct and aviation precinct.*

OPEN SPACE, COMMUNITY & CULTURAL, HERITAGE

UDIA advocates for the development of liveable, affordable and connected cities and regions. The provision of enabling and community infrastructure is critical to all aspects of the successful delivery of housing and employment land. UDIA supports the clear nexus between growth and infrastructure. We recognise that infrastructure requires coordination between local government, state government, and other infrastructure providers.

We are therefore enthusiastic supporters of a UDP as the essential tool to identify infrastructure blockages for development as well as ensure appropriate funding mechanisms for infrastructure delivery. Please refer to our comments below on that topic.

Infrastructure and Services to Support Planned Growth

UDIA supports proactive, regular and transparent reviews of local infrastructure contributions regimes. This helps keep the contributions regime up to date and focused on the infrastructure that is required by the development that is likely to take place in each local government area. We therefore congratulate Council for identifying the Medium-Term Action to review and update its local contributions plans.

UDIA encourages Council to engage early with industry to ensure that residents' needs are met through appropriate levels of infrastructure and services. We would be pleased to continue to work with Council on these important initiatives.

Last month, the Planning Minister announced proposed reforms for infrastructure contributions including s7.11, s7.12 and SIC plans, as well as a review by the Productivity Commission of the overall infrastructure contributions system. UDIA continues to lead advocacy for reform of the infrastructure funding regime and will be closely engaged as these unfold.

We note two Ministerial Directions (MD) related to local infrastructure contributions were issued on 18 May 2020 and both apply to Central Coast Council:

- Environmental Planning and Assessment (Local Infrastructure Contributions – Pooling of Contributions) Direction 2020; and
- Environmental Planning and Assessment (Local Infrastructure Contributions – Information) Direction 2020

The MD related to pooling of contributions allows for pooling of funds across s7.11 and s7.12 contributions plans in order to accelerate the delivery of infrastructure items under the plans. UDIA supports the Ministerial Direction and encourages Council to utilise the pooling provision to support development areas.

UDIA's Central Coast Chapter would be pleased to work with Council to identify how to unlock its \$200 million in unspent local developer contribution funds (including s7.11, s7.12, s7.4 and s64) and start building infrastructure now.

Recommendation 13: *Collaborate with industry to address current infrastructure needs and prioritise investment from developer contributions currently held as restricted assets.*

ENVIRONMENT & SUSTAINABLE DEVELOPMENT

Environmental Strategy and Sustainability

UDIA notes that Council intends to develop a Biodiversity Strategy in the Short Term. We support this Action and would like to engage with Council as it develops its Strategy.

UDIA believes that ecology and biodiversity protection are important, and we support both sustainable and resilient development practices. We note the DLSPS often uses the terms “sustainability” and “resilience” interchangeably. Whilst complementary they are quite different. Sustainability measures typically seek to prevent or limit impact and effects of climate change, whereas resilience / adaptation focuses on accepting that climate change is happening and is about developing responses to it.

We support the core principles of ecologically sustainable development (ESD) which maintains that environmental, social and economic factors are equally important considerations and must be balanced.

The implementation of the Biodiversity Conservation Act (BCA) has increased costs of development and added confusion and complexity to the development assessment process. UDIA urges Council to proceed with caution as it considers how best to balance its goals for economic growth, development and environmental protection, conservation and enhancement.

Environmental conservation is an arena that must be carefully considered within the existing and evolving complex layers of legislation and regulation. The Federal Environment Protection and Biodiversity Conservation (EPBC) Act is currently under its 10 year review, and changes are likely; credit pricing under the NSW Biodiversity Conservation Act has not yet stabilised; and the NSW Government is actively working on strategic conservation planning (bio-certification) for the Central Coast which would have far-reaching impacts, including on available local credits.

UDIA recommends the following approach on environmental conservation within the Central Coast:

1. Any biodiversity offset policy should consider and give credit for conservation measures applied during the rezoning process and should be limited to development requiring offset under the Biodiversity Conservation Act 2016.
2. The LGA should not be utilised as an impact boundary; rather, Council should utilise the Interim Biogeographic Regionalisation for Australia (IBRA) Subregion, and offset requirements should be equally applied notwithstanding their geographic source.
3. Council should provide indicative mapping to help inform investment decisions, but as ecology maps often prove to be unreliable, maps should not be used to exclude specific sites from development.

Recommendation 14: Proceed cautiously and collaborate closely with industry in the development of the Biodiversity Strategy and take a regional approach to biodiversity conservation.

UDIA notes the map on pages 98/99, “Natural Assets” only includes limited mapping and is misleading in that it does not include the full extent of the Coast’s natural assets. UDIA recommends that this map should be expanded to include those other natural assets of the Central Coast including National Parks and State Conservation Areas and zones (or equivalent) E1, E2, RE1, RU3 and SP2 (water supply systems and sewerage systems). The inclusion of these lands would form a more comprehensive picture of the region’s natural endowments.

Recommendation 15: Expand the Natural Assets mapping to include National Parks, State Conservation Areas and appropriately zoned areas.

UDIA supports Council’s goals to plan for a resilient region that can adapt to natural hazards and changing climate. Council must be mindful however of the costs that are passed on to final end users (i.e., homeowners / residents) in achieving compliance with policies guiding sustainable development.

The DLSPS makes several references to Council implementing higher performance standards for new development: “sustainable development”, “sustainable housing”, “building excellence”, “standards for new build”, etc.

We note that standards for these complex matters already exist, including for example:

- Energy performance: the ABCB board have already mapped out planned improvements to the NCC Part J energy efficiency requirements for both residential and non-residential developments, essentially setting the course for a “Net Zero Carbon” building code.
- Sustainable Housing Strategy: Again, existing frameworks are already in place, such as EnviroDevelopment and Green Star communities.

Council should not duplicate or expand on requirements but should instead focus its efforts on encouraging uptake of the existing standards through incentives.

UDIA notes that the DLSPS is silent on strategic considerations for electrical supply capacity on the Coast. We encourage Council to consider how this critical infrastructure will be provided for future development. Council should both engage with Ausgrid on network growth planning, as well as consider incentives to encourage local generation through onsite renewables and use of micro grid

private networks which can assist in delivering lower carbon forms of energy, especially for new sites and precincts.

Recommendation 16: *Avoid duplication of effort and cost by using incentives to encourage private sector uptake of existing sustainability standards and practices.*

INFRASTRUCTURE AND TRANSPORT

Housing and Employment Growth and Infrastructure

UDIA strongly supports the development and use of an Urban Development Program (UDP) as a tool in the coordinated regional delivery of land for housing and employment. We urge Council to work with the Department of Planning and the development industry to establish a robust and meaningful UDP for the Central Coast.

We support the use of a UDP incorporating all land uses including residential, commercial, employment and industrial land supply. We also encourage Council to include social and affordable housing in its monitoring.

We commend Council for identifying, on page 139, that:

We need a coordinated strategic infrastructure framework to underpin the future growth and development of the Central Coast. A Central Coast Regional Infrastructure Plan (CCRIP) will focus on the social, environmental and economic infrastructure required to grow the region's economy and support the productivity and capacity of our cities. TRANSFORMATIVE IDEA: Prepare and implement a Central Coast Regional Infrastructure Plan (CCRIP) to integrate the strategic infrastructure framework with the planned growth areas of the Central Coast region, and ensure that we have the required infrastructure to meet current and future demand.

The CCRIP can provide a strong foundation for a UDP, and the development industry should be closely engaged in the process of its preparation.

UDIA believes any local urban development program should:

- Coordinate and monitor detailed housing and employment land supply and targets in urban renewal areas, infill and new communities in land release areas;
- Coordinate and prioritise the delivery of the necessary supporting infrastructure;
- Signal early identification of blockages;

- Integrate social and affordable housing targets and ensure their integrated programming; and
- Involve a transparent annual program including robust industry liaison/engagement enabling monitoring and input back into policy development and housing and employment land supply programs.

The UDP has an important role to play in the prioritisation and coordination of infrastructure funding and delivery. It should identify infrastructure requirements and can ensure delivery is funded. The UDP can also troubleshoot infrastructure bottlenecks, which would support the orderly delivery of housing and employment land supply.

UDIA strongly believes that a robust UDP requires close development sector liaison in order to validate and update annual housing and employment land supply timings and yields and accordingly there is a clear facilitation role which UDIA would be pleased to perform to assist this process.

UDIA is currently undertaking a pilot UDP project with DPIE focussed on SW Sydney which is bedding down a collaboration model for birthing a new Greater Sydney-wide UDP in 2021. A cornerstone element to the project is the development of a digital UDP input-output platform using the Urban Pinboard (<https://urbanpinboard.com.au/>).

The vision is for the Urban Pinboard UDP platform to allow development sector input on project details, including yields, timing and infrastructure requirements, and also generate 3D visualisations of the future city to be realised from the forward supply outlook. The tool will also help with understanding the 'infrastructure frontier' and help inform decision making on enabling infrastructure prioritisation. UDIA would be pleased to arrange an opportunity to brief Council on the tool and the application to a future Central Coast UDP.

Recommendation 17: *Establish a Central Coast Urban Development Program to monitor and support growth of housing and employment land, and to coordinate the timely delivery of enabling infrastructure, with clear accountabilities in partnership with industry.*

Regional Transportation

There are significant current and future transit oriented-development opportunities on the Central Coast, including at Gosford, Tuggerah and Wyong, to provide new medium density housing and employment floorspace. UDIA is developing its *Urban AI* capacity, a digital 3D future city modelling tool which could help highlight the long-term city-shaping opportunities for the Central Coast's Centres, and which could help government consider growth for projects beyond the short-term challenges.

UDIA supports initiatives which lead to greater opportunity for public transport systems and less reliance on single and low occupancy car journeys. The expected increased connectivity from Sydney and Newcastle, including a potential Fast Train, means that there are associated opportunities for

increases in density around transit nodes and transit corridors. We encourage Council to consider the preservation of longer-term strategic corridors such as a high-speed rail corridor.

We commend Council for its focus on decreasing car dependency by providing more walkable neighbourhoods and active transport and increasing density around transport nodes such as rail stations. UDIA encourages Council to consider whether increased passenger ferry services are an option to move commuters around our major water bodies of the Gosford Broadwater and Tuggerah Lakes system. We recommend that the final LSPS expand on those opportunities.

UDIA commends Council for planning to deliver a Central Coast Future Regional Transport Plan and we would be pleased to engage in the development of that plan. The existence of a UDP, per above, would provide important evidence to identify how the regional transport plan can best support the efficient growth of housing and employment.

***Recommendation 18:** Engage early with industry on the Future Regional Transport Plan to ensure support for housing and employment growth, and more expansively consider the existing train line and potential for ferry services.*

CONCLUSION

UDIA commends Council on the delivery of its DLSPS and appreciates this opportunity to offer comments. We look forward to working collaboratively with Central Coast Council to progress the DSLPS to the next stage and implement appropriate planning controls. Please contact Elizabeth York, Hunter Regional Manager at eyork@udiansw.com.au or 0434 914 901 to arrange follow up.

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