

24 February 2023

Transport for NSW
Central Coast Regional Transport Plan
Transport for NSW
Locked Bag 2300, NEWCASTLE NSW 2302

By email: centralcoastRTP@transport.nsw.gov.au

Dear Sir or Madam,

RE: Draft Central Coast Regional Transport Plan 2041

The Urban Development Institute of Australia NSW (UDIA) is the peak industry body representing the leading participants in urban development in NSW. Our more than 450 member companies span all facets of the industry from developers, consultants, local government, and state agencies. UDIA advocates for the creation of Liveable, Affordable and Connected Smart Cities.

UDIA welcomes this opportunity to comment on Transport for NSW (TfNSW) *Draft Central Coast Regional Transport Plan 2041* (draft CC RTP) which is currently on public exhibition.

UDIA has been advocating for better integration of transport and land use strategic planning for many years. It is pleasing that the NSW Government, in particular the Greater Cities Commission (GCC) and Department of Planning and Environment (DPE), are currently reflecting the aspiration of better integration within their respective strategic documents. UDIA is therefore disappointed with the lack of coordination and forward planning between the draft CC RTP, DPE's *Central Coast Regional Plan 2041* (CCRP) and GCC's *Central Coast Strategy for Economic Growth*.

Connection to the TfNSW State road network is becoming a more significant impediment to delivery of housing supply and employment areas across the Central Coast as a result of poor planning and under investment. Unfortunately, we believe that the draft CC RTP falls well short of providing a plan for how the Central Coast's transport network will be planned and delivered to support the region's expected 21% population growth over the next 18 years. As the Central Coast population moves towards 400,000 people (third largest Region and Local Government Area in NSW) its contribution to the Six City Sydney Megaregion will be crucial to the success of the Six Cities strategy and Sydney's global competitiveness over the long term.

The draft CC RTP reads as a thematic document, lacking specificity. It does not demonstrate how TfNSW proposes to overcome the unique challenges the Central Coast faces, with large distances to travel, given the lakes and environmental assets. Further, the document lacks a strategic approach and prioritisation of nominated outcomes to minimise both the existing and forecasted impediments to local business, employment, housing and tourism.

UDIA offers the following recommendations to improve the Central Coast Regional Transport Plan and our submission provides supporting commentary. Our recommendations are:

- 1. Develop an holistic public transport masterplan, including rail, bus, cycle, walking, and alternative options.**
- 2. Align the corridor studies with the DPE priority Growth Areas identified in the *Central Coast Regional Plan 2041*, and identify the short-, medium- and long-term transport needs and**

linkages for these areas. This analysis will also support TfNSW's contributions to the work of the Central Coast UDP Committee.

3. Develop strategies for improved links to existing and future freight, employment, and transport hubs.
4. Identify a staged and prioritised approach to the delivery of the transport objectives.
5. Conduct further engagement on drafting the final CC RTP, including workshops with Council and industry.

Background

Connection to the TfNSW state road network is a growing impediment to the delivery of housing supply and employment areas on the Central Coast. Several factors have contributed to this impediment including:

- I. A prioritisation of national road and rail infrastructure that passes through the Central Coast region, rather than regional infrastructure directly serving the local community.
- II. Planned infrastructure upgrades have not been accounted for by NSW Treasury's capital planning process and funding decisions.
- III. As a result of Item (I) and (II) there is insufficient funding for state road infrastructure upgrades that align with population growth and urban release areas as forecast by DPE.

Consequently, TfNSW's under-investment in the Central Coast road network has resulted in a decline in the efficiency of the network, such that it has become increasingly difficult to achieve orderly development consents. This increasing challenge has contributed to a reduced willingness by the private sector to invest in the Central Coast.

UDIA acknowledges that TfNSW has identified that there are unique characteristics of the Central Coast, which require unique solutions. The lakes and waterways provide significant challenges to TfNSW, fragmenting and congesting transport solutions. Further, the varying land use and housing types across the region provide challenges that TfNSW has traditionally struggled to overcome.

However, UDIA is concerned by the lack of urgency for critical infrastructure projects identified in the draft CC RTP's Delivery Plan. Many major projects are known to be needed now and their lack of delivery is already having significant negative impacts on the transport network. The draft CC RTP identifies these projects in the 5–10-year Planning timeframe, or worse, they only appear in the Investigation phase. These include projects such as:

	Item	Item #
Planning: 5 – 10 years	Warnervale Link Rd, Albert Warner Drive to Pacific Hwy	34
	Central Coast Hwy upgrade between Wamberal and Bateau Bay	35
Investigation: 5 – 10 years	Improvement to Central Coast Highway between Racecourse Road and Masons Parade	61
	Investigation of priority Lake Munmorah intersection upgrades	63
	Investigation of duplication of Sparks Road between M1 Pacific Motorway and Albert Warner Drive	66

	Gosford CBD place revitalisation, including investigation of improved connections across the rail line	68
	Investigation of activation of urban growth areas	73

Further, a substantial portion of the Central Coast state road network is not identified within the Draft CC RTP at all. These include major sections of the Central Coast Highway (Bateau Bay to Budgewoi), Elizabeth Bay Drive, Woy Woy Road, Avoca Drive as well as all roads west of the M1.

To address these and other deficiencies of the draft CC RTP, UDIA recommends several amendments to the approach of the draft CC RTP. We also call on TfNSW to engage with UDIA and other stakeholders in workshops before finalising the CC RTP, to enable the critical alignment of transport and land use planning to be articulated in the NSW Government's strategic documents.

Public Transport Masterplan

The draft CC RTP indicates a 10-year Investigation timeframe for the *Development of an Integrated Transport Network, improve the integration of bus services with the rail network* (draft CC RTP Goal 42, p80). A 10-year Investigation period, followed by a likely 5-year planning, and then 5-year delivery phase is not suitable to meet the needs of the current or future growing population. The plan does not identify any strategies for bike or bus networks being planned by TfNSW in the short term.

The draft CC RTP calls for a shift from private to public transport, yet there are no projections for growth in intermodal demand or alternative transport growth. Further, the draft CC RTP fails to adequately identify how such a shift will be promoted and implemented, and there is a disconnect in the Delivery Plan for the limited initiatives, such as for electric vehicle (EV) charging.

For example, UDIA sees opportunities for EV charging to be embedded at transport hubs and commuter carparks. Unfortunately, the *Tuggerah Commuter Carpark* (Item 17) is in the 5-year Planning projections, yet the *Development of an EV Fast Charging Network in collaboration with DPIE, Central Coast Council and industry* (Item 41) is in the 10-year Investigation projections. A coordinated approach should integrate EV charging with the delivery of new commuter carparks.

We strongly encourage TfNSW to take an holistic coordinated and integrated approach when planning the transport options for the Central Coast, including both upgrades and new infrastructure.

Recommendation #1 – Develop an holistic public transport masterplan, including rail, bus, cycle, walking, and alternative options.

Alignment with *Central Coast Regional Plan 2041*

The *Central Coast Regional Plan 2041* identifies the region's four key districts as Narara, Central Lakes, Tuggerah and Watagan. See Figure 1 below.

Those districts include the key Growth Areas of: Central Coast Plateau, Somersby, Gosford City Centre, Karagi, Tuggerah, Greater Warnervale. Greater Lake Munmorah and Morisset.

Figure 1: Central Coast Districts



Source: DPE Central Coast Regional Plan 2041, Fig 7, Pt3, p.82

The draft CC RTP does not identify or prioritise the short-, medium- and long-term transport needs that will enable the development of these Growth Areas. Of note, the draft CC RTP is silent on any strategy west of the M1 Motorway, despite the significant employment, freight and tourism applications in this Growth Area.

UDIA strongly recommends that TfNSW prepare those analyses. Further, we recommend the CC RTP identifies the linkages between these Growth Areas and coordinate the corridor-based approach to meet the existing and forecast growth and land use of these Growth Areas.

This work should be conducted as the baseline analysis for both the CC RTP and to support TfNSW's participation as a member of the incoming Central Coast Urban Development Program (UDP) Committee.

Recommendation #2 – Align the corridor studies with the DPE priority Growth Areas identified in the *Central Coast Regional Plan 2041*, and identify the short-, medium- and long-term transport needs and linkages for these areas. This analysis will also support TfNSW's contributions to the work of the Central Coast UDP Committee.

Improved Links to Freight, Employment and Transport Hubs

There are significant deficiencies in the draft CC RTP's approach to freight, employment and transport hubs. As written, the draft CC RTP does not support implementation of the GCC's *Central Coast Strategy for Economic Growth* or the *Central Coast Regional Plan's* Growth Areas.

The draft CC RTP identifies Tuggerah, Gosford and Wyong as requiring improved connectivity and efficiency of freight network (Goal 45 p81). UDIA agrees; however, we are disappointed that the initiative only falls in the 0–10-year Investigation projections. This should be accomplished sooner.

Despite the *Central Coast Regional Plan* and GCC Strategy to generate more jobs in the northern and southern growth corridors, the draft CC RTP does not identify the significant demand already placed on the freight centres of Somersby and Warnervale. Further, the Plan fails to identify the substantial growth projections for Warnervale employment lands west of the M1 Motorway, or the employment lands nominated in the Colongra to Bushells Ridge precinct, including potential demand for additional Motorway links. Linkages between northern Central Coast to southern Hunter, i.e., the developing Morisset employment lands should also form part of this 20 year plan.

UDIA strongly encourages TfNSW to undertake demand assessments for the freight and employment lands identified within the *Central Coast Regional Plan 2041* and the *GCC Central Coast Strategy for Economic Growth* and develop strategies to support those areas and their linkages to the broader network.

Recommendation #3 – Develop strategies for improved links to existing and future freight, employment, and transport hubs.

Staged and Prioritised Approach

UDIA recognises TfNSW can only deliver a portion of the required infrastructure each year. We strongly encourage TfNSW to identify the projects which will provide the most significant economic, public safety and employment benefits to the Central Coast.

Those projects should be prioritised to service the Growth Areas identified in DPE *Central Coast Regional Plan 2041* and *GCC Central Coast Strategy for Economic Growth*.

Recommendation #4 – Identify a staged and prioritised approach to the delivery of the transport objectives.

Further Engagement

UDIA is gravely concerned that insufficient and misaligned planning between strategic transport and land use planning has resulted in under-investment by TfNSW in Central Coast transport infrastructure, resulting in an inability of the NSW Government to achieve its growth plans for the region.

We are encouraged by the new infrastructure-led planning and delivery framework outlined in DPE's *Central Coast Regional Plan 2041*, which seeks to enable the necessary alignment between infrastructure delivery and development. The incoming UDP Committee, of which TfNSW and UDIA are members, will provide the proper mechanism to agree where that alignment is most needed, and assist government to prioritise funding. We urge TfNSW to fully embrace the UDP process.

To better prepare for the UDP exercise, the draft CC RTP must be improved as we have recommended. We urge TfNSW to engage further with the development sector prior to its finalisation, to better understand the transport needs of the priority Growth Areas. UDIA would be pleased to work with TfNSW to coordinate an industry workshop.

Recommendation #5 – Conduct further engagement on drafting the final CC RTP, including workshops with Council and industry.

Conclusion

Thank you for the opportunity to make a submission on the draft *Central Coast Regional Transport Plan 2041*. UDIA is eager to work with TfNSW to improve the final Plan to better enable the expected growth of our region, consistent with the NSW Government's vision articulated in the *Central Coast Regional Plan 2041* and the GCC's *Central Coast Strategy for Economic Growth*. We call on TfNSW to work collaboratively with UDIA to deliver the envisaged outcomes.

Should you have any further questions or to arrange a meeting, please contact Regional Manager Elizabeth York at eyork@udiansw.com.au or 0434 914 901.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Steve Mann', with a stylized, cursive script.

Steve Mann
Chief Executive
UDIA NSW