

9 January 2025

Steve Hartley
Executive Director
Resilience and Sustainability
Department of Planning, Housing and Infrastructure

Via email: ccscp@dpie.nsw.gov.au

Re: Draft Terms of Reference for Central Coast strategic assessment

Dear Steve,

The Urban Development Institute of Australia NSW (UDIA) is the state's leading development industry body. We have more than 450 members across the entire spectrum of the industry including developers, financiers, builders, suppliers, architects, contractors, engineers, ecologists, academics and state and local government bodies. Together with our members, we shape the places where people will live for generations to come and in doing so, we are city shapers. In NSW alone, the property industry creates more than \$581.4 billion in flow-on activity, generates around 387,000 jobs and provides around \$61.7 billion in wages and salaries to workers and their families.

UDIA welcomes the opportunity to offer comments to the draft Terms of Reference for strategic assessment of the Central Coast Strategic Conservation Plan (Plan). We support the draft Terms of Reference and urge the NSW and Commonwealth governments to finalise the Plan this year.

Background

UDIA and our Central Coast Chapter have engaged with the NSW Government including the Department of Planning, Housing and Infrastructure (DPHI) and Department of Climate Change, Energy, the Environment and Water (DCCEEW) for several years now in support of the development of a strategic conservation plan for the Central Coast.

As the NSW Government seeks to deliver the record number of new homes required to deliver its commitments under the National Housing Accord, including 9,400 new homes on the Central Coast in five years, it is critical to provide greater confidence that biodiversity approvals can be achieved and in a timely manner. The delivery of the Central Coast Strategic Conservation Plan will confirm NSW and Commonwealth regulatory biodiversity approval for those parcels of land within the Plan area and provide certainty that environmental and development outcomes can be realised.

Currently, such certainty is gravely lacking on the Central Coast, and the development industry is relying on delivery of the Central Coast Strategic Conservation Plan to provide that certainty for the Plan area.

UDIA's advocacy has always been, and continues to be, focused on achieving better environmental outcomes while also addressing the practical operations of the biodiversity system so that NSW can accomplish its collective environmental, economic and social goals. The urban development sector has the highest volume of interaction with the system, providing UDIA with a unique set of insights that we offer for constructive consideration. We appreciate the ongoing dialogue we have had with the NSW Government on the functioning of the Biodiversity Conservation Act (BC Act) and considerations for its improvement.

In our submissions and meetings with the NSW Government, we have consistently reported our findings that since its implementation, the BC Act has become one of the largest constraints to housing delivery in NSW. Similarly, the BC Act also presents enormous risks to delivering critical infrastructure as well as new jobs and economic growth in NSW. These constraints are particularly acute in the regions which have yet to benefit from investment in strategic conservation planning.

The primary difficulty of the BC Act is the enormous uncertainty it creates when applied on a project-by-project basis, both for development as well as for environmental outcomes.

UDIA strongly supports the use of government-led strategic conservation planning of priority development precincts to ensure good landscape scale environmental outcomes while maximizing the efficient use of land to provide the housing and jobs required to service growth in NSW. The Central Coast Strategic Conservation Plan promises to deliver those more certain outcomes for the Plan area and should be finalised this year.

Conclusion

UDIA supports the draft Terms of Reference and urges the progression of the Strategic Assessment Report and exhibition of the draft Plan as quickly as possible to support better landscape scale biodiversity outcomes while facilitating much-needed housing and economic development on the Central Coast.

Should your team require further information please contact Elizabeth York, Regional Manager on 0434 914 901 or eyork@udiansw.com.au.

Kind regards,



Hon. Stuart Ayres
Chief Executive Officer