Planning Institute Australia - Submission on Draft Central Coast Regional Plan

The Planning Institute of Australia (PIA) is pleased to submit this submission on the Draft Central Coast Regional Plan (CCRP), the first regional land use plan for the Central Coast region since the release of the Central Coast Regional Strategy (CCRS) in 2008. This submission has been prepared by Members of the Hunter Branch of the Planning Institute of Australia NSW Division (PIA NSW).

The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 5000 members nationally and around 1200 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating at all levels in relation to key planning and public policy issues.

PIA supports the development of the CCRP and its strategic policy direction for housing and economic growth across the Central Coast Region. The successful implementation of the plan will provide benefits to the community in respect of housing, jobs, environment, resources, community services and infrastructure provision.

Notwithstanding, PIA considers that there are a number of areas where the plan can be strengthened and we remain confident that the Department of Planning and Environment (DP&E) can capitalise on these opportunities for improvement.
and deliver a strong and robust regional plan that will effectively chart the course for the Central Coast Region over the next 20 years.

PIA has identified a number of key areas that we believe would benefit from further refinement by DP&E which are detailed below.

The Vision

Good strategic plans map out the vision for an area and drive the implementation of actions to achieve that vision. PIA believes the vision should be a simple and straightforward statement that clearly defines the future for the Central Coast in the next 20 years. The current vision for the Central Coast is ambiguous and fails to articulate the dynamic nature of the region in a clear and concise statement.

PIA suggests a simple vision such as for the Growing Sydney Plan – “Sydney will be a strong global city, a great place to live.” This is a statement that everyone can understand and captures the broad aspirations of community, business and government. The Vision needs to set a forward looking goal where these aspirations are encapsulated by a Vision statement that clearly articulates what type of region the Central Coast is to be in 20 years, and how it responds to resilience, opportunity and innovation in its planning and growth.

Governance

PIA considers that identifying an appropriate governance structure is a key issue for the CCRP and supports the inclusion of reference to delivering the plan and the proposal for establishing the Central Coast Regional Plan Co-ordination and Monitoring Committee. However, the detail on delivering the plan does not go far enough and should be much more integrated with a defined Implementation Program that is central to the outcomes espoused by the Plan. This should be transparent to all key stakeholders, prior to adoption of the Plan, rather than being developed and inserted at the time of finalisation. This process would enable the identification of key priority actions for implementation across the whole of the region and allow for competing issues to be identified and resolved. PIA is concerned that the introduction of an Implementation Plan in the final version of the Plan will only create further debate about the key priorities and potentially dilute the effectiveness of the proposed Governance and Implementation framework.

PIA considers that the role of the Co-ordination and Monitoring Committee should also be defined in terms of responsibilities for implementation, monitoring review
and adaptation to changing social, environmental and economic circumstances. The Actions in the Plan should be linked to outcomes that define success.

Monitoring and reporting should report on performance. To achieve this, PIA considers that there needs to be less motherhood statements and generalisation in the Actions to enable clarity of connection for their implementation. That is, more precision as to what should be done, by whom and by when is required.

The effectiveness of any committee charged with implementing the plan needs strong leadership with objectives and key performance indicators that at the end of each year can relate performance back to demonstrable achievement of the Vision, the Goals and the Directions contained in the Regional Plan.

The Draft Central Coast Regional Plan should at a minimum go to the extent of the Illawarra Shoalhaven Regional Plan which in Appendix 2 summarises the actions and is more precise around relating direction, actions, lead agency (IES), key stakeholder (S) and timing. It is noted that even this implementation framework falls short of international best practice, such as practiced in parts of the United States. PIA therefore strongly encourages the Department to include an Implementation Plan for further discussion and review prior to the finalisation of the Central Coast Regional Plan.

Leadership of the Coordinating and Monitoring Committee should logically be the responsibility of the Central Coast Regional Director of the Department of Planning & Environment (or equivalent). It is submitted that support is also needed from commissioners similar to the Greater Sydney Commission who have responsibility for advising and driving leadership of achievement of actions from social, economic and environmental perspectives.

Finally, a success of the governance framework in implementing the desired outcomes of the Regional Plan also requires sufficient representation of local interests, both community and Council. PIA considers that the proposed governance framework currently provided in the draft Plan does not provide sufficient local representation whereby only one representative from Gosford and Wyong Councils is intended to be part of the Committee. This local representation is diluted even further in the likely event of the proposed amalgamation of Gosford and Wyong Councils.

Accordingly PIA strongly requests that the Department review the proposed approach to implementation and governance based upon the above comments. PIA would welcome discussions with leadership in the Department regarding the
approach to implementation and governance of the Central Coast Regional Plan prior to its finalisation.

Infrastructure

The plan in its current state does not include an integrated infrastructure plan. PIA considers this a key flaw in the plan and something that would add significant value. The inclusion of an infrastructure plan to complement the regional land use plan would be a vehicle to identify key infrastructure priorities, both current and proposed and also be utilised to guide the release of housing land. The delivery of infrastructure to unlock appropriately zoned land to cater for the expected population increase and specifically the sequencing of infrastructure provision is vital. Coupled with this is the need for an integrated transport plan that identifies key priorities and includes all modes of transport; public transport, active transport, freight and commercial should be included.

The Central Coast Discussion Paper (2014) envisaged infrastructure planning and growth (housing and employment) targets. The CCRP proposes no forward planning for infrastructure, rather it only deals with committed infrastructure (e.g. Gosford Hospital), where the Discussion Paper considered the planning of Infrastructure required to support the required growth as an integrated approach to the Spatial Strategy for the Region. Further, the CCRP does not identify employment targets. Setting employment targets provides commitment to jobs and the infrastructure that is required to support these jobs, and enables monitoring and measuring of success against these targets.

PIA recommends that the Department incorporate more specific Actions with relation to the provision of infrastructure that will enable the Goals and Directions to be achieved. Further to the above there is no allocation of funding identified. Greater confidence could be given if a funding mechanism was identified and further clarification is required on how infrastructure delivery will be prioritised.

The need to manage existing and future infrastructure to be more resilient to natural hazards is highly desirable. In our view, the CCRP has not responded adequately to resilience and climate change as part of the strategies for development or infrastructure provision. PIA suggests that the Department consider including some conceptual targets / criteria within the plan assist in this regard.
Implementation

We have already discussed above the importance of integrating the proposed Governance structure with an Implementation Plan that clearly articulates key priorities and responsibilities. However, the generality of the maps, actions and commitments in the draft Plan does not provide clear guidance on how the Plan will be implemented or funded to achieve the goals. Actions and commitments must be specific, measurable and have an appropriate time-frame for implementation. Specific, measurable actions will ensure that progress in achieving the goals can be monitored and reported upon. Specific and measurable actions will also allow the allocation of appropriate funds to ensure that the goals can be achieved.

Each ‘Action’ within the draft Plan identifies the NSW government commitments intended to achieve the actions and directions in the Plan. Many of the actions include a statement that the NSW Government "will work with" local Councils to deliver the action. However the draft Plan does not provide any specific detail on how the NSW government will work with Councils to achieve the actions or how these will be funded. In fact, many of these future actions are things that should already have been undertaken in collaboration with local Councils and included in the draft Plan, given the time between the release of the Central Coast Discussion Paper in 2014 and the draft Regional Plan.

The Evidence base

There has been much recent emphasis by the Department on the need for evidence-based planning; this referring to planning decisions that can be shown to have been informed by substantial data and an understanding of relevant elements. For example, A New Planning System for NSW Green Paper (July, 2012) proposed that ‘all levels of strategic plans – regional, subregional and local – will now have common elements including: … a strong evidence base and understanding of financial feasibility’. This approach is even reflected in the draft Regional Plan whereby reference is made to a comprehensive evidence-base that underpins the plan, including data and projections on population, housing, employment and transport.

However, PIA has formed the view that the current draft Plan displays a lack of transparency in the way many of the Goals and Actions in the plan have been made, and poor supporting evidence in terms of both accuracy and currency of data. The CCRP needs to ensure Actions that can be achieved and are founded
in the evidence-base currently available. Some aspects where there appears to be a critical shortage in evidence include:

A. Housing Growth

The Housing supply required to accommodate the additional population identified by the draft plan is 39,600 new dwellings across the Central Coast. However, the current Urban Feasibility Model for the Central Coast indicates that within current planning tools, only 18,500 new dwellings are feasible (Gosford 13,150 and Wyong 5135) and recognises the impact of the current planning rules, infrastructure servicing charges and the cost of biodiversity offsets for land development throughout the Central Coast.

This will require the adoption of flexible planning controls and reduced infrastructure charges, supported at all levels of government, which could promote sufficient growth to accommodate the projected housing demands in the Central Coast Region. In addition, those long term residential projects that are not considered feasible due to contributions or environmental constraints are either prioritised as key urban development projects, and funded appropriately, or are identified as medium to long term actions therefore enabling all levels of government and the private sector to focus on outcomes that can be achieved in the shorter term.

B. Population Growth

The projected population growth anticipates that 65% of growth will occur from outside of the Region and, by 2031, 85% of growth will be from outside the Region. However, the projections seem to be backward looking and relatively low compared with the approvals and developments being lodged across the Central Coast Region. A revised population projection should be considered to reflect these growth trends or the introduction of medium and high growth scenarios that are linked to major infrastructure projects and development.

The draft Plan also envisages a significant growth in the population cohort aged 65 years and more single and couple only households. In this regard, residents aged 65 years and older will increase from 20% to 28% of the total Regional population, which equates to more than 300,000 people, whilst single or couple households are projected to comprise approximately 72% of the total population growth within the Central Coast Region, which is an entirely different housing
typology to the single dwelling house that dominates most of the urban footprint of
the Region. PIA believes that the CCRP needs to further explore these
challenges for the provision of housing having regard to the rapid changes in
demographics that are expected in the Central Coast Region over the next 20
years.

The future of the Central Coast Region also needs to contain a balanced
population which supports the younger demographics and encourages people to
stay on the coast and raise families. Only through a strategy to retain the younger
demographic will the coast create a sustainable future. Just how this can be
achieved requires further investigations regarding the planning controls envisaged
for areas nominated to accommodate this growth, such as the mix of dwelling
types and sizes, the overall density in urban centres, and the mixing of uses to
encourage localised employment opportunities for the Regional population.

C. Economic Growth

Economic growth on the Central Coast is a key message raised by the community
and Government at all levels. The CCRP correctly recognises that the Central
Coast with its proximity to both Sydney and the Hunter has opportunities for
economic growth and the creation of new jobs. It also recognises the (relative)
significant contribution that the Region has to the State Gross Regional Product –
approximately 8% of the NSW total.

However, the CCRP is silent on job creation targets, which is a departure from the
Discussion Paper released in 2014. The identification of targets provides clarity to
business and government and ensures on-going monitoring and performance
measures against which government can be measured.

Protect and Connect Natural Environments

PIA supports the Plan’s intention to protect and connect the natural environments
within the region. Approximately 50% of the Region is high value environmental
land contributing to not only the scenic value of the Region but creates a network
of environmental corridors that provide links and larger connections to the Great
Dividing Range, the Hawkesbury, Ku-ring-gai National Park and the Watagans
National Park. This poses challenges for the Government in achieving the
appropriate balance between developments and protecting the natural
environment.
In this regard, there is a priority need to ensure that mapping across the entire document is reviewed against Gosford and Wyong Councils’ own mapping to ensure that they reflect Council information currently available. PIA believes that this should be updated within the regional plan as part of the regular reviews. There are number of existing policies, Acts of Parliament, Regulations and guidelines that currently guide biodiversity requirements in NSW. Given the existing legislative framework PIA would caution the Department in its endeavour to “create the right regulatory environment and implementing appropriate protection measures to conserve validated high environmental values, including through the application of planning controls” and would recommend that this does not result in additional regulatory process.

The Central Coast region has beautiful and iconic beaches and coast line and a lot of industry relies on the coast including tourism, sea-based activities and the like. PIA believes that not enough attention is afforded to the coast and management of the coastal zone. PIA strongly recommends that during the finalisation of the plan that Department works closely with the Office of Environment and Heritage to incorporate the outcomes of the current review into coastal legislation being undertaken by the Government, including the planning for improved resilience.

The Institute welcomes ongoing engagement on the draft Central Coast Regional Plan and is happy to elaborate on any of the matters covered in this submission.

Yours Sincerely

Marjorie Ferguson
MPIA CPP
NSW President