

11 November 2025

Central Coast Team  
Department of Planning, Housing, and Infrastructure

Sent to: [ccscp@planning.nsw.gov.au](mailto:ccscp@planning.nsw.gov.au) and lodged online

To whom it may concern

## **Draft Central Coast Strategic Conservation Plan (CCSCP)**

I write with regard to the DPHI's proposed Strategic Conservation Plan for the Central Coast.

Urban Taskforce welcomes the streamlining of development and biodiversity conservation processes, with particular reference to the delivery of housing and jobs.

Moves to reduce the red tape and environmental compliance requirements applied to development will make it easier to deliver the employment, industrial, and residential properties that are needed to support growth in the Central Coast.

To this end, we support the intention to recognise employment, residential, and special purposes development as classes of action under the *Environmental Protection and Biodiversity Conservation Act 1999* and to ensure, through strategic biodiversity certification, that no further biodiversity approvals would be needed for pre-assessed areas.

However, our members have some questions about the proposals.

### **1. Scope**

- The CCSCP is predominantly centred around the three priority growth areas of Somersby, Greater Warnervale, and Greater Lake Munmorah. Are there any plans to extend the provisions to other parts of the Central Coast? (it should).
- Does the Department propose to use this Plan as a model for other regions?

### **2. Certified urban capable land**

- Given that development applications must still be lodged for certified urban capable land areas, what information will be made available about approvals requirements and land constraints for individual sites?
- Is the Department's offer to conduct free surveys ongoing, or is it time limited? If a developer seeks to build on land in the future but the original landholder did not seek a survey, will that come at a cost?
- The papers say that landholders will still require planning approvals, "*which will include mitigation measures to reduce the impacts on biodiversity*". How will these measures be determined through the development application process? Will they be standardised or tailored for specific locations?
- If certified urban capable land is not developable due to other constraints or open space requirements, will other sites be made available as an alternative?

- How will a landholder know up front if surveys for the four critically endangered plants are needed? Will this be a requirement for all sites, or does the Department have a reasonable idea of where the plants might be located?

### **3. Non-certified land**

- The papers say that non-certified land has been deemed not suitable for more intensive development. How is "more intensive" defined? What types of construction are allowable?
- If essential infrastructure has to be constructed on non-certified land, will the developer have to carry out biodiversity assessments to facilitate it, or will the Department manage that process?
- Will the development of essential infrastructure be subject to additional biodiversity charges?

### **4. Existing DAs**

- The papers said that landholders with existing DAs or planning proposals who wish to be excluded from the CCSCP could apply to the Department, but must do so by today. Is there scope to extend this timeframe, given that many may still be unaware of the impending deadline?

### **5. Strategic biodiversity component levy**

- If applied on top of the Housing and Productivity Contributions base for the Central Coast, the proposed strategic biodiversity component (SBC) levy will more than double current local basic HPC charges. Does the Department propose to offset these costs against developer contributions so that the price of a dwelling does not increase unsustainably? Are there any incentives proposed to assist developers to offset these additional costs?
- The SBC should be applied at the occupation certificate stage, when a developer has received money that can be used to cover the cost, instead of prior to subdivision or construction certificates being issued. Will this be considered?
- Will all developments on certified urban capable land have to pay the SBC, or will it only be applied in specific locations where biodiversity offsetting is required?
- As the SBC "*can only be used on direct conservation commitments set out in the biodiversity certification order*", what systems will be put in place to ensure that this occurs, so that funding is not otherwise diverted?

### **6. Biodiversity offsets program**

- How does the Department intend to manage the strategic offsets program?
- Will this program be part of, or in competition to, the Biodiversity Offset Scheme (BOS)?
- If the CCSCP's offsets program is additional to the BOS, what concessions might be available to landholders who are required to carry out biodiversity conservation activities under the latter scheme?


## Conclusion

While the Urban Taskforce welcomes the Department's commitment to reducing red tape for biodiversity conservation under the CCSCP and to facilitate local development, there is more work to be done before this plan can be finalised,

This submission demonstrates the vast array of questions still to be answered before this Plan can be finalised. We would welcome further guidance on the Plan and are willing to work further with the Department on the Plan going forward, particularly if there is any intention for similar strategies to be rolled out in other areas of the State.

Should you wish to discuss any aspect of this submission further, please contact our Policy, Planning and Research Analyst, Paul Waterhouse, on 041 1-875-366 or via email on [paul@urbantaskforce.com.au](mailto:paul@urbantaskforce.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

**Tom Forrest**  
Chief Executive Officer