

# OPTIMA DEVELOPMENTS

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TOWN PLANNING AND DEVELOPMENT CONSULTANTS  
DEVELOPMENT INVESTIGATIONS & ENVIRONMENTAL STUDIES. DEVELOPMENT APPEALS  
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28 January 2016

The Regional Director  
Department of Planning & Infrastructure  
PO Box 1148  
Gosford  
NSW 2250

Dear Sir,

## **SUBMISSION TO DRAFT CENTRAL COAST REGIONAL PLAN - Our ref: ccl-dop08**

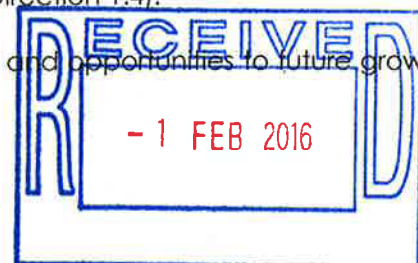
Reference is made to the recent exhibition of the above Draft Plan for which the following submission is made for consideration.

The main concerns relate to the implementation of the Goals, Directions and recommended Actions, particularly in regard to their application to the urban renewal of the Umina Beach CBD. These concerns had previously been raised in the Optima submission of 13 July 2013 to the exhibition of the Draft CCRS. For ease of reference a copy of this submission is attached.

At that time the issues were also discussed with the officers of the Gosford Regional office who indicated that the Umina Beach and East Gosford centres were the only two centres that have defied the previous identified strategic trends and that it was acknowledged that these centres popularity and development were being driven by market forces. A strategic review should occur (although no commitment was provided).

Optima is enlightened by the stated Goals, Directions and Actions of the Draft Plan that relate to this particular issue and locality; namely:

- Increasing the supply and variety of housing in established, accessible areas will make best use of existing services and infrastructure such as public transport. It can also act as a catalyst for urban renewal (Goal 1).
- Grow and enhance liveable local centres (Direction 1.2) by preparing the right regulatory setting for investment and business activity (Action 1.2.1). To this end local strategies are already in place with Umina Beach identified as having future growth potential.
- The NSW Government will support GCC to prepare and implement local centre strategic and associated review of LEPs and DCPs;
  - Prioritise investment in infrastructure and services for areas experiencing growth and capable of delivering growth (Action 1.2.2).
  - Support Council to identify opportunities to facilitate private investment in centres (Action 1.2.2).
  - Accelerate housing supply with the aim to support the competitive advantage of housing affordability relative to the Sydney Metropolitan area (Direction 1.4).
  - The NSW Government will identify blockages to growth and opportunities to future growth (Action 1.4.2).



Optima's experience with the current strategic and statutory planning controls which were partly outlined in the 2013 submission (see copy attached) and now combined with the application of recent controls in the Apartment Design Guide, appear to represent a blockage to growth and the opportunities to facilitate growth.

The main impact is the practical application of the Development Incentives identified within the strategic planning documents and GLEP 2014 applicable to the Umina Beach centre, particularly relating to FSR and building height.

Subsequent to the commencement of the GLEP 2014 (February 2014) controls the government adopted the Apartment Design Guide (July 2015) which is considered an excellent and one of the most useful recent strategic planning documents. This guide now applies to mixed use developments, such as that envisaged by the GLEP and DCP for the Umina Beach centre.

Our experience in dealing with investigation associated with a five lot consolidated urban renewal development site in the heart of the Umina Beach centre, amounting to a site area of some 2529 m<sup>2</sup> allowing some 4,552 m<sup>2</sup> of floor space is that the only way to achieve the Incentive FSR of 1.8:1 and comply with the Apartment Guide is to exceed the 14.5 m height control.

The possibility of variation of the height controls by the use of clause 4.6 in this situation is made more difficult by the recent LEC decision in *Four 2 Five Pty Ltd v Ashfield Council*

The development industry requires certainty and removal of any ambiguity. If superior quality development is to be achieved and encouraged as envisaged by the Apartment Guide for mixed use developments then obstacles such as restrictive development standards need to be removed or made more flexible. Additionally the strategic hierarchy of the centres on the Peninsula is well overdue for review as being outdated in respect to responding to market forces.

Optima seeks the Department and Council commitment to a review of the strategic and statutory planning documents and controls to enable the achievement of the Governments Goals, Directions and Actions of the Draft Central Coast Regional Plan.

Looking forward to consideration of this submission for which an acknowledgement would be greatly appreciated.

Sincerely  
Optima Developments Pty Ltd



Chris Oliver  
Director / Principal Consultant

Cc Bruce Ronan – Gosford City Council

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17 July 2013

The Regional Director  
Department of Planning & Infrastructure  
PO Box 1148  
Gosford  
NSW 2250

Dear Sir,

## **PROPOSED REVIEW OF CENTRAL COAST REGIONAL STRATEGY - Our ref: ccl-dop07**

Reference is made to the proposed 5 year comprehensive review of the above strategy for which Optima would like to pre-empt an issue that is consider to warrant consideration as part of this exercise.

A pre cursor to the adoption of the Centres Strategy for the Gosford LGA and in particular the Woy Woy Peninsular was the funding by the Department and ultimate adoption by both the Department and GCC of the PUDS. This strategy which was of 2005 vintage provided the foundation of the adopted centres hierarchy for the Peninsula. However substantial environmental issues and on ground developments, many of which have been driven by the market forces, have occurred that, in our opinion, result in the need to revisit this strategy as part of the comprehensive review.

The following points support this opinion.

- o The CCRS identified the hierarchy for the Peninsula as Woy Woy being the principle town centre and Ettalong and Umina Beach as supporting village centres. These principles were carried over into the GCC DLEP 2009 and DDCP, when exhibited during 2010 and which are yet to be finalised, with indications that re exhibition is imminent. Therefore even with the best endeavours a final revised statutory EPI document is most unlikely before the end of 2013 at the earliest.
- o The PUDS and exhibited DLEP and DDCP documents identified an extended Business Centre of Umina Beach with density, floor space and height controls reflective of the hierarchy with Umina Beach having the lesser controls compared to Woy Woy and Ettalong, whilst having the greatest redevelopment potential.
- o It is accepted that since this hierarchal identification (2010 to 2013), Woy Woy has been plagued by the clarification of constraints such as flooding and climate change implications. Ettalong has not flourished as envisaged due to possible adverse impacts of the GFC on tourism, whilst Umina Beach has defied all trends and has expanded substantially within the existing commercial zoned areas. However the identified town centre expanded urban renewal areas have remained in limbo mainly due to the current inappropriate Residential 2(b) zone.

- o The subsequent developments of Woolworths, Aldi, revitalised Coles, McDonald's, Bunnings and new Post Office/Chemist (currently well under construction) along with other planned commercial redevelopments within the Umina Beach commercial centre have in our opinion, resulted in a change to the envisaged hierarchal order of the Peninsula centres(NB. Optima is currently assisting in DA preparation for a large commercial site at the eastern end of the West Street).
- o Coupled with the above GCC has been developing concepts (and have already sought public input) to a civic redevelopment of the public car park area situated between Bullion and Alfred streets. This included below and above ground car parking with residential units above to a height of 4 storeys, as currently envisaged under the DLEP and DDCP.
- o The overall hierarchical order and redevelopment potential of the current Residential 2(b) zoned land identified within expanded Business Centre of Umina Beach, needs to be revisited and reviewed as part of the review of the CCRS, in recognition of the above referred to market driven development events
- o The opportunity should not be lost to capitalise on the economically healthy development position of the town centre, before the urban renewal areas identified under the PUDS are redeveloped (as envisaged under the current proposed zoning and controls of the DLEP 2009) below the true potential of the town centre. The town centre obviously now has the capacity to cater for an increase in development, particularly supporting higher density residential development in this urban renewal process. Such increase would be consistent with the state government strategies for similar centres throughout the metropolitan area of Sydney.
- o As a minimum, consideration should be given to changing the Peninsula centres hierarchical order (by recognising the changing status of Umina Beach) and increasing the development controls to allow for an increase in development potential to support this growing and successful centre.

Looking forward to consideration of this submission for which an acknowledgement would be appreciated.

Sincerely  
Optima Developments Pty Ltd



Chris Oliver  
Director / Principal Consultant

Cc Bruce Ronan – Gosford City Council