

30 March 2016



Secretary
Department of Planning and Environment
GPO Box 39,
Sydney NSW 2001

Attention: Mr. Paul Maher

Submitted by email: hunter@planning.nsw.gov.au
paul.maher@planning.nsw.gov.au

Dear Paul

RE: DRAFT HUNTER REGIONAL PLAN & DRAFT PLAN FOR GROWING HUNTER CITY

I refer to your email correspondence of 23 March 2016 with Mr. Stephen Barr of Barr Property and Planning in which you have kindly agreed to a late submission from Huntlee Pty Ltd regarding the Draft Hunter Regional Plan and the Draft Plan for Growing Hunter City. This letter constitutes our submission on the draft plans.

Comment 1 – Hunter Expressway lacks strategic recognition.

The draft regional plan "...sets out a series of directions and actions that will collectively deliver the goals identified for the Hunter region." The first goal identified is to Grow Australia's Next Major City ("Hunter City"). However, the notional boundaries for Hunter City ignore the Hunter Expressway (HEX), a \$1.7 billion infrastructure investment. It appears that the Department's justification for excluding the HEX from the Hunter City boundaries is because the *"...primary purpose of the Hunter Expressway is for intra-regional traffic, including movement of freight to the Port of Newcastle. Any consideration of further development that relies on using the Hunter Expressway as access will not be supported if it impacts on this primary purpose."*ⁱ

On face value, this appears to be a somewhat one dimensional position regarding the HEX's purpose. Nevertheless, the draft regional plan does not identify a single "strategic" centre, or any centre of significance for that matter, for any part of the HEX. This seems to be an incredible planning oversight, particularly when the Department acknowledges that the *"...Hunter Expressway provide(s) unprecedented access between the Hunter Valley and Hunter City."*ⁱⁱ This same piece of infrastructure provides the same unprecedented access to the Hunter Valley from major metropolitan regions such as Sydney and the NSW Central Coast. To omit any centre of significance at any point along the HEX seems to be a missed opportunity.

Comment 2 – Confluence of rail and road infrastructure at Branxton has not been identified.

The Department has clearly stated its vision for the HEX as being for intra-regional traffic/freight movements and that any new developments should respect and not hinder this primary purpose. However, the draft regional plan fails to recognise existing developments that already have proximate and reliable access to the HEX, such as Huntlee.

Looking more closely at Huntlee, nowhere else in the proposed Hunter City does major high speed arterial road infrastructure coincide with heavy rail infrastructure. This confluence of transport infrastructure occurs only at Branxton, the location of Huntlee. Transit Oriented Development (TOD) is now a proven urban planning principle that is steeped in layman's logic; i.e. put people, employment, and services next to good transport infrastructure. But the form of TOD does not necessarily mean high-rise apartments around a suburban train station; the principles of TOD can be equally applied to well-planned greenfields development. The key ingredient is good transport infrastructure which Branxton / Huntlee provides. The draft plan should better recognise the rail and road infrastructure node at Branxton and the potential this creates for further infrastructure investment.

Comment 3 – Lochinvar is more suited to the hinterland definition than the Hunter City definition.

The draft Regional Plan shows Lochinvar within the notional boundary of Hunter City. Reference to the accompanying draft plan for Growing Hunter City suggests that Lochinvar would be included in the Maitland-New England Highway Corridor. This corridor has traditionally seen fragmented development along the New England Highway. But most of this growth occurred prior to completion of the HEX and therefore historical development patterns can no longer be relied upon to inform future development demands. It therefore appears that Lochinvar's inclusion in Hunter City relies on the fact that there is a defined Urban Release Area that pre-dates completion of the HEX.

With the HEX now having radically transformed travel movements, the Lochinvar Urban Release Area (already a difficult location to develop), becomes even more difficult to economically develop and is unlikely to see any material progress over the life of the draft plans. Lochinvar's inclusion runs the risk of falsely prioritising the potential allocation of infrastructure capital and planning resources.

Including Lochinvar in Hunter City also has the potential to misrepresent the ideal land use and development character of Lochinvar. The existing settlement character of Lochinvar reflects a "rural" and/or "lifestyle" pattern, with a clear preference for larger acreage plots evident throughout the area. Redefining Lochinvar into an "urban" platform as part of the broader Hunter City definition is likely to cause conflict amongst the established lifestyle character and a new urban development character.

Comment 4 – Huntlee meets the directions for growing Hunter City and offers opportunities as a gateway centre.

In contrast to Lochinvar, Huntlee has been defined within the hinterland zone. We find this somewhat perplexing given that Huntlee represents exactly what *growing Hunter City* should be in

almost every facet. To illustrate, Huntlee addresses many of the Directions in the draft plan for growing Hunter City, such as;

- Huntlee is a key driver of future growth (Direction 1.1),
- Huntlee is a provider of a diverse housing mix, with smaller “cottage” products being the first of its kind in the region and offering down-size and more affordable housing (Direction 1.2),
- Huntlee is perfectly situated on two high capacity transport modes, being rail and road (Direction 1.3),
- Huntlee provides 700Ha of new permanent conservation lands *on site*, together with more than 5000Ha of conservation lands throughout the region (Direction 1.4),
- Huntlee provides 200Ha of B4 zoned land which permits service commercial opportunities with direct access to the HEX (Direction 1.5),
- Huntlee is providing new infrastructure such as high speed internet via NBN that is connected to the premises (Direction 1.6),
- Huntlee is developing innovative land-use principles for the efficient delivery of State Government education infrastructure (Direction 1.6), and
- Huntlee is providing reliable, sustained, consistent, affordable land release under single ownership (Direction 5.1).

Comment 5 – A tourism gateway is missing from the draft regional plan.

Destination NSW reports that The Hunter received 3.1 million domestic overnight visitors in the year ended September 2015, 43% of whom were from Sydney.ⁱⁱⁱ And the “daytrip” visitors exceeded 5.7 million. The draft regional plan identifies Pokolbin as a Viticulture Critical Infrastructure Cluster (requiring protection), but little is said of its significant tourism potential. The regional plan should identify further gateway locations into the Hunter region, particularly given the broad appeal of the Hunter Valley winery, festival, golfing, and tourism enterprises.

Suggestions

The logic in consolidating different planning documents of different vintages into a single coherent overarching strategy makes sense. Our suggestions for the final regional plan(s) include:

1. The one dimensional role of the HEX should be reconsidered. The HEX provides a bigger role in driving economic growth, diversifying employment and population centres, and bringing visitors from further afield. It is our suggestion that a sub-regional plan be developed for the HEX corridor. The sub-regional plan does not need to include greater housing density in the corridor which may adversely affect the HEX’s primary role, rather the supplementary roles of the HEX’s should be identified and better integrated into the planning strategy.
2. The confluence of road and rail transport at Branxton has been overlooked. Good planning puts people, employment, and services near good transit infrastructure. It is our suggestion that in consolidating the regional plans, the Department should identify Branxton/Huntlee as a strategic centre and allocate appropriate infrastructure funding (e.g. community services) to facilitate its growth as an urban growth and employment centre.
3. The boundaries of Hunter City should be reconsidered by undertaking new, better land use modelling now that the HEX has been completed. The reliance of historical fragmented

development patterns does not necessarily provide a reliable guide as to where and how future development patterns will occur. To this end, it is our suggestion that Lochinvar is incorrectly identified as being part of Hunter City when it is more likely that it will develop as a rural / lifestyle character area rather than a new urban front for Hunter City.

4. The significance of the Pokolbin wine region needs further discussion as to its role in the region's economic potential. Tourism requires "destinations" or key places where services and supplies can be found. These destinations need to relate to the journey and form part of the tourism experience. Gateway locations serve this purpose by providing a clear "arrival" point and the ability to obtain essential services (fuel, food, maps, cultural interactions, destination information and the like). The primary source of visitors to the Hunter is Sydney, suggesting that the largest mode of transport is by vehicle. The completion of the HEX provides the safest and quickest entry into the wine region, and the development of Huntlee provides the opportunity to invest in gateway infrastructure. It is our suggestion that Huntlee is identified as a strategic centre with the dual or secondary "role" as a gateway hub into the Pokolbin wine region.

Conclusion

Overall, we consider the consolidation of diverse planning documents to be a worthwhile exercise. In terms of the western part of the draft regional plan, we believe that the draft plan omits some key elements that influence how land is used and how the population will evolve in the region. The draft plans need to recognise the bigger role of the HEX and how it will redefine land use within the region. We consider that Huntlee provides an excellent example of how growing Hunter City can be achieved, yet its position and role as a gateway to the region are largely ignored. Our suggestion is that the final regional plan is reframed to either include Branxton within the definition of Hunter City, and failing that, then Huntlee should have a more strategic role within the plans.

We trust the above comments are of use to the Department and we look forward to reviewing further iterations of the planning documents. If you require anything further please contact me.

Yours sincerely



Stephen Thompson
Project Director – Huntlee

ⁱ NSW Government (2015), *Draft Plan for Growing Hunter City*, p37

ⁱⁱ ditto

ⁱⁱⁱ Destination NSW, *Travel to the Hunter Year Ended September 2015*