

Friday, 26 February 2021

Daniel Simpkins
Director, Central Coast and Hunter
Department of Planning, Industry and Environment
Level 2
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NEWCASTLE NSW 2300

By email: hunter@planning.nsw.gov.au

Dear Dan,

Response to draft Hunter Expressway Strategy

The Urban Development Institute of Australia NSW (UDIA) is the leading industry body representing the interests of the urban development sector in the Hunter and across NSW. UDIA represents over 400 member companies across the industry including developers, consultants (engineering, planning, legal, environmental, design), agencies and local government, for the goal of Liveable, Affordable & Connected Smart Cities.

UDIA appreciates the opportunity to offer our comments in response to the *draft Hunter Expressway Strategy (draft Strategy)*.

UDIA strongly supported the delivery of the Hunter Expressway (HEX) in 2014. This \$1.7 billion investment was hailed as a “game changer” for the Hunter. The public including industry welcomed the promise of more efficient interstate, interregional and intraregional connections with the opportunities this represents for NSW’s largest regional growth centre. Indeed, the HEX has brought positive change to the region and all Hunter residents enjoy its benefits either directly or indirectly.

The Hunter has been growing steadily over recent years, and booming sales for new homes in 2020 has diminished the housing supply pipeline in the region. UDIA cautions that some additional flexibility may be needed in considering the land use potential across the Hunter, including around the HEX. This year, the Department of Planning, Industry and Environment (DPIE) is undertaking a review of the Hunter Regional Plan 2036 and Transport for NSW (TfNSW) is developing a Hunter Regional Transport Plan. UDIA strongly advocates for the integration of transportation and land use planning and these reviews may prompt different thinking for utilisation of the HEX.

UDIA is keen to work with DPIE to maximise the benefit of this significant investment. Toward that goal, we offer the following recommendations to the draft Strategy:

- 1. DPIE postpone finalisation of the Strategy until the results of the Hunter Regional Plan review and Hunter Regional Transport Plan are incorporated in an updated draft Strategy.**

2. TfNSW and DPIE make publicly available the background analysis on current and expected future heavy and light vehicle traffic volumes; and provide detailed analyses of employment targets and impacts of currently zoned land.
3. DPIE specify the strategic plans that will directly inform consideration of future planning proposals related to the Hunter Expressway and outline the process and accountable timeframes to secure the necessary State-level support for council-prepared initiatives in this regard.
4. NSW Government accelerate planning and investment to support the revitalisation of by-passed historical towns such as Lochinvar, Greta and Branxton.
5. DPIE and TfNSW agree on and specify the studies needed to understand connecting road upgrades, their funding requirements and delivery timeframes.

Lack of Background Evidence

UDIA notes that the draft Hunter Expressway Strategy appears to be based on a highly conservative philosophy that prioritises the preservation of road capacity for freight movements over all other considerations.

While the importance of HEX for transport of freight is not disputed, the draft Strategy does not provide or reference any empirical evidence about current light/heavy vehicle traffic volumes on HEX and its interchanges. Neither does the draft Strategy purport to be informed by forecast traffic growth based on currently planned development.

The draft Strategy does not acknowledge that there is already a substantial supply of zoned, undeveloped industrial land in the vicinity of the HEX, including at John Renshaw Drive, Black Hill, the Hunter Economic Zone at Kurri Kurri, the New England Highway at Lochinvar and the Singleton Industrial Area at Whittingham. The draft Strategy talks about the need for HEX to attract economic growth and employment at strategic locations; however, it does not contain any employment targets nor does it identify any new investigation areas for employment land.

Constraints such as flood risk, slope, vegetation, and buffers to rural industries or assets leave limited opportunity to expand the urban footprint within the prioritised Maitland to Branxton growth corridor. The draft Strategy proposes to introduce an arbitrary constraint to planning for future residential land supplies in one of the fastest growing areas outside Sydney in favour of speculative employment-generating uses. UDIA believes this is done without suitable justification.

Without these analyses, including an indication of the theoretical capacity of HEX and its interchanges (above which the efficient movement of freight is compromised), it would seem premature to rule out the possibility of any rezoning for residential development within interchange growth areas.

UDIA is concerned that the draft Strategy makes assumptions and draws policy conclusions that are not supported by evidence. If a policy position prejudiced against future rezoning is indeed justified, the supporting evidence should be made publicly available.

Recommendation 2. TfNSW and DPIE make publicly available the background analysis on current and expected future heavy and light vehicle traffic volumes; and provide detailed analyses of employment targets and impacts of currently zoned land.

Strategic Planning Framework

In relation to interchange growth areas, the draft Strategy states that “proposals for additional large-scale changes to development potential will need to be first considered through a local strategy”.

UDIA is concerned that the draft Strategy provides no detail as to what, if any, existing documents (e.g. Local Strategic Planning Statements, Maitland Urban Settlement Strategy, Cessnock [draft] Urban Growth Management Plan, etc.) are relevant considerations in this regard, nor does it outline a process and accountable timeframes to secure the necessary State-level support for council-prepared initiatives in this regard.

We are further concerned that this requirement may lead to unnecessary delays to worthwhile proposals given that most lower Hunter councils are not required to update their Local Strategic Planning Statements (LSPS) for another 5 years (notwithstanding the stated intentions of some to consider updates earlier). Additionally, the fact that several interchange growth areas straddle at least one local government area (LGA) boundary means that more than one LSPS may need to be considered.

UDIA is alarmed that the draft Strategy appears to establish a State Government policy position to not consider any new rezonings across some 13,000 ha of land until multiple separate councils establish long-term strategies that are deemed acceptable by both DPIE and TfNSW.

Unfortunately, the strategic planning framework outlined in the draft Strategy provides more uncertainty for planning and investment than exists without it.

Recommendation 3. DPIE specify the strategic plans that will directly inform consideration of future planning proposals related to the Hunter Expressway and outline the process and accountable timeframes to secure the necessary State-level support for council-prepared initiatives in this regard.

Bypassed Towns

UDIA notes that the historical towns of Lochinvar, Greta, and Branxton were bypassed when the HEX opened and are still awaiting adequate State-level planning and investment to secure their future. The draft Strategy may impose additional planning restrictions, further diminishing their opportunities. The revitalisation of these towns relies on their ability to attract new residents and establish new identities, which will require residential and commercial-focused planning proposals (i.e., rezoning). The draft Strategy hinders such prospects.

Recommendation 4. Accelerate planning and investment to support the revitalisation of historical bypassed towns such as Lochinvar, Greta and Branxton.

Planning and Funding Connections

UDIA notes that the draft strategy mentions important connections from HEX to other destinations such as the Port of Newcastle via John Renshaw Drive but does not provide any detail regarding the requirement for, timing of, or funding responsibility for upgrades to these important connecting roads. Additionally, further analysis of the likely need for upgrades in the vicinity of Newcastle Interchange and along Newcastle Link Road is a logical action related to the HEX but is not mentioned in the draft Strategy.

Cursory mention is made of 'park and ride' facilities and public transport without assigning any responsibility or timeframe for investigating these opportunities.

UDIA recommends that any strategy clarify next steps and deliver an implementation plan. We expect that the implementation plan will include assessing needs for connecting road upgrades, potential sources of funding and delivery timeframes. The inclusion of these actions will significantly strengthen the final Strategy and add confidence for investors.

Recommendation 5. DPIE and TfNSW agree on and specify the studies needed to understand connecting road upgrades, their funding requirements and delivery timeframes.

Conclusion

UDIA is suitably concerned that the draft Strategy establishes a de facto policy position prejudiced against future rezoning without adequate justification. Our concern is strong enough that we recommend finalisation of the strategy should be postponed until the appropriate background evidence is established and released for public exhibition with a second draft, which may draw a different conclusion. We believe it would be beneficial to complete the Regional Plan review and Hunter Regional Transport Plan, which are currently getting underway, and incorporate their collective findings into the next draft Hunter Expressway Strategy.

Recommendation 1. DPIE postpone finalisation of the Strategy until the results of the Hunter Regional Plan review and Hunter Regional Transport Plan are incorporated in an updated draft Strategy.

The Hunter Expressway can and should be considered holistically in the growth of the Hunter in general including the Greater Newcastle metropolitan area. Freight is vital for our national, state and regional economies, but so too are local jobs and housing.

UDIA would like to work with DPIE and TfNSW to better understand the freight, employment and housing needs that could be supported by the HEX. We look forward to contributing to the Regional Plan review and development of the Regional Transport Plan and having an opportunity for further examination of the HEX background analyses.

Thank you for the opportunity to offer our feedback on the draft Hunter Expressway Strategy. We would be pleased to meet to discuss these matters in more detail. Please contact Hunter Regional Manager Elizabeth York with any follow up at eyork@udiansw.com.au or 0434 914 901.

Yours sincerely,



Mr Steve Mann
CEO, UDIA NSW