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Australia's property industry

## Creating for Generations

11 March 2022

NSW Department of Planning, Industry and Environment

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PO Box 1226, NEWCASTLE NSW 2300

### RE: PROPERTY COUNCIL OF AUSTRALIA – DRAFT HUNTER REGIONAL PLAN 2041

The Property Council of Australia welcomes the opportunity to provide comments to the Draft Hunter Regional Plan 2041 (draft Plan), currently on public exhibition by the Department of Planning and Environment (the Department).

The Property Council of Australia is the leading advocate for Australia's biggest industry – property. It champions the interest of more than 2200-member companies that represent the full spectrum of the industry, including those who invest, own, manage and develop in all sectors of property.

Property is the nation's biggest industry – representing 13% of Australia's GDP and employing more than 1.4 million Australians. Our members are the nation's major investors, owners, managers and developers of properties of all asset classes. They create landmark projects, environments, and communities where people can live, work, shop and play. The property industry shapes the future of our cities and has a deep long-term interest in seeing them prosper as productive and sustainable places.

We acknowledge and appreciate Government's recent engagement with industry regarding the draft Plan and understand through this engagement that consultation will continue post exhibition and encourage its consideration in alignment with the Draft Regional Transport Plan which is now due for exhibition on 21 March.

Should you have any questions, please do not hesitate to contact Hunter Regional Director, Anita Hugo on email at [ahugo@propertycouncil.com.au](mailto:ahugo@propertycouncil.com.au)

Yours sincerely

A handwritten signature in black ink that reads "Anita Hugo".

Anita Hugo  
Hunter/Central Coast Regional Director  
**Property Council of Australia**

## 1. Executive Summary

The Property Council welcomes the opportunity to provide comments to the Draft Hunter Regional Plan 2041 (draft Plan).

A key issue for the industry is that what was expected to be an update to the existing Hunter Regional Plan 2036 (HRP2036) appears to be a comprehensive revision, including changes that move away from longstanding regional level outcomes or practices.

Given the vast and comprehensive nature of the changes, this submission does not attempt to address every element of the Draft Plan. Instead, it focuses on the elements that appear to introduce material or fundamental changes in regional-level planning intentions or practice. A summary of all recommendations is provided below.

### NEW FORMAT

#### 'Big Ideas'

Clearer strategic directions and more accompanying actions should be provided in the final version of the draft Plan to ensure the pathways to achieving desired outcomes associated with the plan's 'Big Ideas' are clearly understood by all stakeholders.

#### Strategic Alignment

The Department should continue to work closely with key stakeholders (beyond the exhibition period) to ensure the implications of fundamental and material changes to regional-level planning are fully understood before Draft Plan is finalised.

This update to the HRP2036 should still serve to provide more detailed guidance to inform Council's work programs where strategic gaps exist, or urgent adjustments are required to implement existing or new regional-level planning priorities.

The final version of the Draft Plan should reflect (in mapping and written intent) relevant local planning outcomes that are currently endorsed (e.g., Urban Investigation Areas) to avoid confusion or unnecessary complexities in planning and plan-making processes.

### MEASURED OUTCOMES

#### Dwelling Requirements

The final version of the Draft Plan should provide clear strategic directions and pathways for change to guide planning for future housing supply, including an indication of where targets may be required **above** the implied dwelling requirements to meet real demand.

#### Housing Supply Targets

The final Plan should provide directions for planning housing land supply and an indication of housing land supply targets / planning benchmarks to 2041, including how this should be factored into local-level planning. These targets should factor in change in demand from increased regional migration.

#### Greenfield / Infill Delivery Ratio

The final Plan should provide clear strategic directions and associated actions to achieve the fundamental shift required to realise a greater proportion of residential growth through infill development. This should include conclusive definitions for what constitutes 'greenfield' versus 'infill' development to allow progress to be meaningfully monitored.

### Optimum Density

The final Plan should not rely on a density measure as an overall planning average at the regional scale, and instead use it as a place specific indicator. This will rely on clearer strategic directions and pathways for achieving change around specific features (e.g., public transport nodes and urban renewal corridors) or locations (e.g., early-stage growth areas) where planning control frameworks should be set or re-set to achieve higher densities than currently envisaged.

### 15-minute neighbourhoods

The final Plan should provide clearer strategic directions and pathways for achieving 15-minute neighbourhoods, including corresponding directions for infrastructure planning and delivery.

## **HOUSING LAND SUPPLY**

### Priority Locations

The final Plan should re-instate place-based directions for priority housing growth areas where further planning and infrastructure coordination/delivery efforts are required. This should include place-based directions for established growth areas along the New England Highway corridor (namely between Maitland and Huntlee) as an ongoing regional planning priority within the Greater Newcastle District.

### Regionally Significant Growth Areas

The final Plan should provide clearer strategic directions actions for the Viticulture Growth Area, supported by tangible actions for Government. This includes reflecting key mapped elements across both Cessnock and Singleton Local Government Areas and recognise the need to prioritise planning for existing businesses to ensure these are retained within the Region.

## **EMPLOYMENT LAND SUPPLY - PRIORITY LOCATIONS**

### Regional-scale economic study

The final Plan should be underpinned by a regional level economic study to provide a clearer indication of the demand, priority locations and directions for planning in relation to employment lands.

## **TRANSPORT INFRASTRUCTURE**

### Public transport

The Plan should be finalised in conjunction with the Regional Transport Plan to ensure these documents provide a clear and consistent framework for integrated planning to occur for and around transport infrastructure.

### The Hunter Expressway (HEX) Corridor Growth Area

The HEX Corridor Growth Area boundaries and directions should be reviewed to avoid confusion and introducing unnecessary complications to planning and delivery in established urban growth areas.

The review of HEX Corridor Growth Area boundaries and directions should be underpinned by an economic study.

## ENABLING DEVELOPMENT

### Mines Grouting Fund

The final Plan should support an extension of the Newcastle Mines Grouting Fund and consider applying it within other high-growth areas such as Lake Macquarie. The fund needs to have an ongoing feeding mechanism to provide the level of certainty needed for investment decisions.

## 2. Detailed Commentary and Recommendations

### NEW FORMAT

#### 'Big Ideas'

The Property Council acknowledges and supports in principle the following 'Big Ideas' presented in the Draft Plan:

- Greater diversification of employment, mining and energy generation lands.
- Sequenced planning for new land uses and infrastructure.
- New pathways to promote economic self-determination and greater recognition and respect of traditional custodians.
- Establishment of net zero emissions as a guiding principle.
- 15-minute mixed use neighbourhoods.
- Emphasis on infill approaches to growth.
- A renewed focus on green infrastructure, public spaces and nature.
- Prioritisation of walking, cycling and public transport.
- Reinforcing the importance of equity to provide greater choice.

Achieving the desired outcomes described for each of these will rely on Government leadership and whole-of-Government coordination.

Greater detail and further discussion and engagement with industry and other stakeholders will be required as to how these objectives will apply across the region and how these outcomes will be achieved. The Draft Plan moves away from the action-based format and objectives of the HRP2036 and doesn't answer the question of how these new objectives will be achieved.

**Recommendation: Clearer strategic directions and more accompanying actions should be provided in the Final Plan to ensure the pathways to achieving desired outcomes associated with the Plan's 'Big Ideas' are clearly understood by all stakeholders.**

#### Strategic Alignment

Regional plans set the framework and directions for strategic land use planning. While the Draft Plan is a consultation document, it could now be utilised as a material consideration in the assessment of Planning Proposals to amend Local Environmental Plans. Even in its draft form, it is given statutory weight through the *Environmental Planning and Assessment Act 1979*. More significantly, it will serve to influence investment decisions within the Region as these are made based on the information available in the public domain at the time.

The Draft Plan was expected to be a review of the HRP2036 and would have been better served if it clearly outlined the new objectives and how they related to the direction of the HRP2036 or how they differ and why it has moved away from the original plan. This would allow for a more focused consideration of the implications of any apparent fundamental and material changes proposed in the

Draft Plan, which warrant careful consideration to avoid undue impacts to investment certainty and confidence and to avoid jeopardising the successful implementation of regional-level planning priorities.

**Recommendation: The Department should continue to work closely with key stakeholders and industry (beyond the exhibition period) to ensure the implications of fundamental and material changes to regional-level planning are fully understood before Plan is finalised.**

Since the HRP2036 was initially released, the first generation of Local Strategic Planning Statements have been introduced for every Local Government Area in the region. The Draft Plan reverts to these wherever possible, which appears to provide them with more weight – in the decision-making process – than the regional plan. We recognise the work Councils have done to establish their Local Strategic Planning Statements to date; however, also acknowledge the challenges each area faced in establishing these.

**Recommendation: This update to the HRP2036 should still serve to provide more detailed guidance to inform Council's work programs where strategic gaps exist, or urgent adjustments are required to implement existing or new regional-level planning priorities.**

The format of the Draft Plan also makes it difficult for planning practitioners to conclusively determine how a proposal aligns with the strategic framework. The aim should be to minimise the number of documents one has to consult through the planning process.

**Recommendation: The final Plan should reflect (in mapping and written intent) relevant local planning outcomes that are currently endorsed (e.g., Urban Investigation Areas) to avoid confusion or unnecessary complexities in planning and plan-making processes.**

## **MEASURED OUTCOMES**

### **Monitoring program**

A rigorous and thorough monitoring process should be established, preferably through an independent body such as the newly-formed Greater Cities Commission, to track how the Department and Local Councils are performing in delivering the outcomes of the Plan. Key performance indicators, such as housing approvals and completions, gross floor area of employment-generating land uses, processing times of development applications, timely provision of key infrastructure, etc could be identified and used to provide a framework for tracking progress. This will give a degree of transparency and accountability for stakeholders and the community that the NSW Government is progressing and delivering on the Plan.

**Recommendation: A framework to monitor the delivery of the plan should be developed and implemented to ensure transparency and accountability on the delivery of the Plan.**

### **Dwelling requirements**

The HRP2036 indicated 70,000 additional dwellings are required to 2036 to cater for the projected levels of population growth, of which around 85% were expected be in the Lower Hunter LGAs (60,600 combined total for Lower Hunter LGAs). The Greater Newcastle Metropolitan Plan (GNMP) indicated similar levels of developments, indicating around 60,450 additional dwellings would be required.

We acknowledge that these dwelling requirements are a product of the State-wide population projections, which are reviewed and updated separately to the Regional Plan review process. We also recognise that these figures represent the **implied** dwelling requirement, which may not be entirely reflective of **actual** demand. The current State-wide projections are also not reflective of population

growth changes occurring during the COVID-19 pandemic, where a 'tree-change' occurred creating increased demand for housing. In addition to this, people who would have moved away from the Hunter area delayed or postponed their plans due to the uncertainty of COVID. The anticipated typical loss of population did not occur, and a greater influx of people moving to the area has created greater demand for housing supply than the NSW Government would have accounted for pre-COVID.

The Property Council recently commissioned an analysis of regional housing supply considerations for every region in NSW. Some key revelations emerging from this research as relevant to the Hunter are summarised below.

- The Hunter is on track to deliver the implied dwelling requirements set out in the HRP2036, but development activity suggests the implied dwelling requirements fall short of real demand. This trend pre-dates the COVID-19 pandemic, which indicates factors beyond population growth (e.g., growth in tourism) are also driving residential development within the region.
- The extent to which housing in the Hunter is accessible (e.g., available for sale and rent) and affordable (in relation to household income) is diminishing. In conjunction with the insight above, this suggests that supply is not keeping pace with real demand.
- Certain areas within the region already appear to be functioning as supply-driven markets.

Collectively, these insights point to the need for a greater emphasis on and support for upfront strategic planning, particularly in regional plans, which is also one of the key recommendations of the Regional Housing Taskforce. The Draft Plan currently does not provide any indication of the number of dwellings anticipated to be required to 2041 or how this should be factored into local-level planning.

**Recommendation: The final Plan should provide clear strategic directions and pathways for change to guide planning for future housing supply, including an indication of where targets may be required above the implied dwelling requirements to meet real demand.**

#### Housing land supply targets

Regional-level plans are material considerations in the assessment of Planning Proposals. The *Greater Newcastle Metropolitan Plan 2036* (GNMP) states Planning Proposals for new urban release areas will not be supported unless an individual Local Government Area (LGA) (under Action 19.1) or the Urban Development Plan (UDP) (under Action 17.3) identifies a 'less than 15-year supply' of new dwellings is available.

Each LGA has established its own methodology for measuring housing land supply, which limits the extent to which supplies can be compared within the Greater Newcastle Metropolitan District. To date, only one UDP annual report has been published, which does not specify whether any additional land is required to maintain adequate supply.

The Draft Plan does not provide any update as to whether additional land is required to maintain adequate supplies, or if the 15-year supply benchmark established in the GNMP remains relevant. Instead, this is a stated responsibility of the established UDP committee.

However, the Draft Plan does make an unqualified statement that there is ample housing supply available as justification to preclude the establishment of entirely new development fronts within the next 10 years. Despite this, it goes on to provide, but not commit to, the locations of 'potential future growth areas' should circumstance change.

The approach to planning for housing land supply is intrinsically linked to the dwelling requirements described above. It should also be considered a critical element to providing the greater emphasis on

and support for upfront strategic planning, particularly in regional plans, as recommended by the Regional Housing Taskforce.

**Recommendation: The final Plan should provide directions for planning housing land supply and an indication of housing land supply targets / planning benchmarks to 2041, including how this should be factored into local-level planning.**

#### Greenfield / Infill delivery ratio

The GNMP set a target of 60% dwellings growth to occur through 'infill' (which is also described as the 'existing urban area'), with the remaining 40% to occur through additional greenfield release. The Draft Plan target for the GNMP 'district' revises this to 80% infill and 20% greenfield, with a further guide of 50-75 dwellings per hectare of developable land to be the optimum density achieved overall. Individual place strategies / projects to specify what is appropriate for a given area (p37). A small-lot target is not specifically addressed in the Draft Plan.

The only annual report ever published by the Urban Development Program indicates Greater Newcastle has historically been achieving a 50/50 split between Greenfield and Infill development. This suggests a fundamental change in practice may be required to achieve the desired change in this ratio. However, we also recognise that the definition of infill has sometimes included development within Urban Release Area land because these lands are shown as part of the existing 'urban footprint'. The unclear nature of this categorisation has historically made tracking progress against this target somewhat controversial.

**Recommendation: The final Plan should provide clear strategic directions and associated actions to achieve the fundamental shift required to realise a greater proportion of residential growth through infill development. This should include conclusive definitions for what constitutes 'greenfield' versus 'infill' development to allow progress to be meaningfully monitored.**

#### Optimum Density

The GNMP previously set a guide for urban densities of between 50-75 people/jobs per hectare in catalyst areas and urban renewal corridors, with a further target of 25% of all housing growth being in the form of small-lot and multi-dwelling housing.

As mentioned above, the Draft Plan proposes a target of 50-75 dwellings per hectare of developable land to be the optimum density achieved overall. A small-lot target is not specifically addressed in the Draft Plan. Delivery of this is described as relying upon individual place strategies / projects to specify what is appropriate for a given area.

We understand most new residential areas in the Hunter have historically delivered density levels between 10-15 dwellings per hectare. That suggests a fundamental change in practice may will be required to achieve the desired outcome described in the draft Plan. However, the regional-level average density has, to our knowledge, never been quantified.

Property Council supports the principle of utilising density targets to make the most efficient use of land, but it is unclear how the approach currently described in the Draft Plan is meant to be achieved. There is also no mechanism to monitor density, so it is unclear how progress towards achieving this optimum density will be measured.

**Recommendation: The final Plan should not rely on a density measure as an overall planning average at the regional scale, and instead use it as a place specific indicator. This will rely on clearer strategic directions and pathways for achieving change around specific features (e.g., public transport nodes and urban renewal corridors) or locations (e.g., early-stage growth**

**areas) where planning control frameworks should be set or re-set to achieve higher densities than currently envisaged.**

#### 15-minute neighbourhoods

HRP2036 set a target for 95% of people to live within 30 minutes of a 'strategic centre' by 2036. This Draft Plan goes further, proposing the creation of 15-minute neighbourhoods as applied in three primary contexts of urban, suburban and rural; the three principle elements of this concept being time of travel, mode of travel, and types of services that are accessible. As with the optimum density target, delivery of this is also described as relying upon individual place strategies / projects to specify what is appropriate for a given area.

Achieving this target will rely on delivery within both established and newly emerging centres, which needs to occur in conjunction with appropriate planning for and investment in enabling infrastructure.

The Property Council supports this as a valuable aspiration, whilst acknowledging the challenges presented with the different contexts, but it is unclear how the approach currently described in the Draft Plan is meant to be achieved. There is also no mechanism to distance-based accessibility at a regional-level, so it is unclear how progress towards achieving this target will be measured.

**Recommendation: The final Plan should provide clearer strategic directions and pathways for achieving 15-minute neighbourhoods, including corresponding directions for infrastructure planning and delivery.**

### **HOUSING LAND SUPPLY**

#### Priority Locations

HRP2036 named the Maitland Corridor, Newcastle - Lake Macquarie Western Corridor, and the emerging corridor centred on Cooranbong, Morisset, and Wyee as 'growth areas', and commits the Government to prioritising planning efforts and funding for the delivery of regional infrastructure within these locations.

When comparing these directions with the current draft Plan, it appears:

- The Draft Plan in its final form will repeal the Maitland Corridor and the Newcastle – Lake Macquarie Western Corridor, as part of the Greater Newcastle District, given no update or place-based directions are provided for these areas.
- The Draft Plan in its final form will elevate the status (from a planning-perspective) of the emerging corridor centred on Cooranbong, Morisset and Wyee to a 'regionally significant growth area', with directive mapping and planning considerations provided as part of the Central Lakes district.

This change introduces a high degree of ambiguity for priorities along the New England Highway in particular, where early-stage urban release areas are expected to continue delivering the highest levels of growth outside the Sydney Metropolitan area. These areas can serve as important delivery mechanisms for other place-based outcomes sought by the draft Plan, including in relation to residential densities and 15-minute neighbourhoods.

**Recommendation: The final Plan should re-instate place-based directions for priority housing growth areas where further planning and infrastructure coordination/delivery efforts are required. This should include place-based directions for established growth areas along the New England Highway corridor (namely between Maitland and Huntlee) as an ongoing regional planning priority within the Greater Newcastle District.**



We also note the Maitland Corridor and the Newcastle – Lake Macquarie Western Corridor areas overlap with the newly-introduced Hunter Expressway (HEX) Corridor Growth Area, which appears to give priority to planning for the HEX greater weight in these locations. Relevant recommendations are provided later in this submission.

### Regionally Significant Growth Areas

We support the inclusion of the Viticulture Growth Area, corresponding to the Hunter Valley Vineyards District, as a Regionally Significant Growth Area given the area's contribution to the Hunter's economy and its location across two Local Government Areas. The Property Council has been an active participant in Cessnock Council's Vineyards District Planning Project as a reference panel member in recent years. We acknowledge some of the ideas emerging from this project are reflected in the strategic directions and mapping shown in the draft Plan.

There have been several commitments and attempts by government at various levels to provide a unified planning framework and platform for investment in the Hunter Valley Vineyards District for decades. In our view, this work remains ongoing and relies heavily on broader coordination to resolve competing and conflicting values across tourism, agriculture, and other drivers seeking opportunities for development within the area. This includes the needs of current businesses who may be seeking to expand or diversify their existing operations.

The State-wide planning framework available to support tourism and rural enterprises is less flexible than similar frameworks available for urban areas. This typically warrants a more bespoke approach and innovative responses (e.g., in land use zoning and assessment considerations). In our view, the current place-based directions for the Viticulture Growth Area do not provide a clear indication to the market as to what actions will be taken by State or Local Government to address longstanding complexities.

**Recommendation: The final Plan should provide clearer strategic directions actions for the Viticulture Growth Area, supported by tangible actions for Government. This includes reflecting key mapped elements across both Cessnock and Singleton Local Government Areas and recognise the need to prioritise planning for existing businesses to ensure these are retained within the Region.**

## **EMPLOYMENT LAND SUPPLY- PRIORITY LOCATIONS**

### Regional Level Economic Study

The GNMP identified a series of Catalyst Areas, most of which are intended to drive employment uses or economic productivity. The Draft Plan accepts all the existing GNMP Catalyst Areas as 'regionally significant growth areas', which commits the NSW Government to preparing Place Strategies for these areas.

The Draft Plan goes on to nominate an extensive quantity of land as 'for investigation' to provide future employment lands, including (but not limited to):

- The HEX Corridor Growth Area, as the preferred location for industrial and freight and logistics uses,
- The Liddell and Bayswater Power Station Growth Area, supporting it to be repurposed as a renewable energy hub with spare capacity to accommodate other employment generating uses, and
- 'Areas of Interest' within existing Upper Hunter mining areas, supporting these to be repurposed for post-mining for intensive employment-generating purposes.

The Draft Plan does not provide a clear indication of the approach or timeframes to establish or review planning frameworks for these areas. Yet, collectively, they encompass an area around twice the size of the Western Sydney Aerotropolis, which was afforded a significant level of public sector resourcing to support upfront strategic planning and infrastructure coordination / delivery.

Employment land monitor data for the Hunter shows a considerable amount of zoned and undeveloped supplies is already available on top of the additional investigation areas / areas of interest proposed in the Draft Plan. Yet, the Draft Plan does not acknowledge the established locally nominated employment precincts – particularly those with direct access to the New England Highway and heavy rail line - that still appear to have capacity.

**Recommendation: The final Plan should be underpinned by a regional level economic study to provide a clearer indication of the demand, priority locations and directions for planning in relation to employment lands.**

## **TRANSPORT INFRASTRUCTURE**

### Public transport

GNMP action 20.2 commits the Government to develop guidance for redevelopment near specific train stations and other transport nodes throughout Greater Newcastle. An info box within the GNMP discusses the need to make better use of heavy rail infrastructure across the metropolitan area.

Planning for development around train stations is not specifically addressed in the Draft Plan. There is general acknowledgement of housing between two to four storeys within walking distance of town centres, public open space and rail stations and the promoting of densities in greenfield areas to make public transport and a mix of uses viable, and Fast Rail is anticipated.

It is not yet known whether the guidance for development around train stations will be provided in the updated Regional Transport Plan.

**Recommendation: The Plan should be finalised in conjunction with the Regional Transport Plan to ensure these documents provide a clear and consistent framework for integrated planning to occur for and around transport infrastructure.**

### The Hunter Expressway (HEX) Corridor Growth Area

HRP2036 Action 4.10 committed the Government to prepare a strategy for land along the HEX that considers its region-shaping potential and the GNMP Action 23.1 directs Councils to ensure rezoning of land within the HEX corridor is consistent with the HEX Corridor Principles (incorporated into the GNMP) and the strategy proposed in HRP2036 Action 4.10.

A draft HEX Strategy was exhibited in December 2020. This was never finalised as a standalone document and instead has been incorporated directly into the Draft Plan, which identifies the HEX Corridor as a 'Regionally Significant Growth Area'.

The approach to planning within the HEX Corridor Growth area is underpinned by the Planning Principles previously introduced by the GNMP, to:

1. Maximise accessibility through the existing interchanges to maintain connectivity and productivity across Greater Newcastle.
2. Protect high value land adjacent to each interchange for industrial and freight and logistics uses.
3. Protect the operation of the HEX by limiting the encroachment of sensitive residential uses.

Neither the draft Strategy previously exhibited, nor the draft Plan provide a clear justification as to how the HEX interchange growth area boundaries were established. The radii distances applied varies widely for each interchange, increasing in scale from east to west. For example:

- Buchanan interchange radius = 1-2km
- Branxton – Allandale interchanges radii = 5-6km

As previously described, the boundaries identified for the Branxton-Allandale and Kurri-Loxford interchanges overlap considerably with land that has been established through rezonings as priority locations for housing future housing, as part of growth area extensions to the long-standing Maitland Corridor identified in HRP20362036. The intent for planning within the HEX Corridor Growth Area is not entirely compatible with the priority afforded to residential growth within these areas. This is evident in the directions that serve to 'prohibit' any further residential rezonings.

**Recommendation: The HEX Corridor Growth Area boundaries and directions should be reviewed to avoid confusing or introducing unnecessary complications to planning and delivery in established urban growth areas.**

The intent for planning within the HEX Corridor Growth Area also openly aims to privilege industry and freight and logistics uses on higher value land adjoining the HEX interchanges. There is no indication given as to the amount of land that would be required to meet the needs of these industries, nor does mapping identify preferred sites. This provides a high degree of ambiguity for future planning and plan-making, particularly given the apparent availability of employment lands in suitable locations along the New England Highway and Golden Highway, which also form part of the national freight network.

**Recommendation: The review of HEX Corridor Growth Area boundaries and directions should be underpinned by an economic study.**

## **ENABLING DEVELOPMENT**

### Mines Grouting Fund

Under District Planning and Growth Areas the Draft Plan mentions the Newcastle Mines Grouting Fund. This fund is crucial to providing certainty to investors and enabling growth and development. The fund is due to expire at the end of 2022 and the Property Council has been calling for the extension of this fund along with consideration of extension to other areas such as Lake Macquarie. We have raised the issues of mapping requirements and we understand this fund is currently under review. The growth of the Greater Newcastle Area is dependent on the ability of investors and developers to be able to access the certainty that the fund provides and should not be underestimated as a critical function.

**Recommendation: The final Plan should support an extension of the Newcastle Mines Grouting Fund and consider applying it within other high-growth areas such as Lake Macquarie, along with completion of mapping.**

**-END-**