



Anambah to Branxton Draft Structure Plan

HIA Submission
October 2026





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About the Housing Industry Association

The Housing Industry Association (HIA) is Australia's only national industry association representing the interests of the residential building industry.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. Our members are involved in delivering more than 170,000 new homes each year through the construction of new housing estates, detached homes, low & medium-density housing developments, apartment buildings and completing renovations on Australia's 9 million existing homes.

HIA members comprise a diverse mix of companies, including volume builders delivering thousands of new homes a year through to small and medium home builders delivering one or more custom built homes a year. From sole traders to multi-nationals, HIA members construct over 85 per cent of the nation's new building stock.

The residential building industry is one of Australia's most dynamic, innovative and efficient service industries and is a key driver of the Australian economy. The residential building industry has a wide reach into the manufacturing, supply and retail sectors.

Contributing over \$100 billion per annum and accounting for 5.8 per cent of Gross Domestic Product, the residential building industry employs over one million people, representing tens of thousands of small businesses and over 200,000 sub-contractors reliant on the industry for their livelihood.

HIA exists to service the businesses it represents, lobby for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building development industry. HIA's mission is to:

"promote policies and provide services which enhance our members' business practices, products and profitability, consistent with the highest standards of professional and commercial conduct."

HIA develops and advocates policy on behalf of members to further advance new home building and renovating, enabling members to provide affordable and appropriate housing to the growing Australian population. New policy is generated through a grassroots process that starts with local and regional committees before progressing to the National Policy Congress by which time it has passed through almost 1,000 sets of hands.

Policy development is supported by an ongoing process of collecting and analysing data, forecasting, and providing industry data and insights for members, the general public and on a contract basis.

The association operates offices in 22 centres around the nation providing a wide range of advocacy, business support services and products for members, including legal, technical, planning, workplace health and safety and business compliance advice, along with training services, contracts and stationery, industry awards for excellence, and member only discounts on goods and services.



Introduction

On behalf of the Housing Industry Association (HIA), we thank Cessnock City Council, Maitland City Council and Singleton Council for the opportunity to provide feedback on the Anambah to Branxton Draft Structure Plan (draft Plan). HIA acknowledges Council's significant efforts in planning for our future housing needs.

The Anambah to Branxton corridor is one of the Hunter Region's most important long-term opportunities to deliver well-located housing. As identified the growth area spans approximately 15,000 hectares across the Cessnock, Maitland and Singleton local government areas and is identified in the Hunter Regional Plan 2041 as a Regionally Significant Growth Area.

HIA's position

HIA supports the draft Plan and its infrastructure-led, cross-council approach. Coordinated planning at this scale is essential to establish a sustained pipeline of serviced land, improve housing choice and give industry confidence to invest.

HIA's support is subject to consideration of comments and amendments that ensure that the high-level framework can ensure commercially viable and timely development. The final Plan should clearly identify development sequencing, infrastructure responsibilities, funding arrangements and measurable housing-delivery milestones. It should also avoid imposing premature constraints or costs before detailed precinct investigations are complete.

Key issues and recommendations

1. Prioritise development-ready and serviceable sites capable of delivering housing in the short to medium term.
2. Review the precinct sequencing assumptions of the Infrastructure Delivery Plan, including the assessment criteria used.
3. Undertake direct, meaningful engagement with HIA, other industry associations such as UDIA and PCA, landowners and developers before finalising the draft Plan.
4. Verify the accuracy and currency of infrastructure servicing, wastewater and other underlying mapping.
5. Clarify the treatment and sequencing of precincts, particularly those locations that are currently or can soon be developed.
6. Secure NSW Department of Planning endorsement and incorporate the findings and identified growth areas into the Central Coast and Lower Hunter Plan currently being developed.
7. Recognise greenfield development as essential to housing supply, affordability, diversity and the Hunter's polycentric growth.



Detailed Comments

1. Strategic planning and sequencing

The draft Plan identifies unconstrained areas and uses servicing and multi-factor analysis to determine precinct priorities. However, following discussion with industry, HIA is concerned that the proposed staging and sequencing may not adequately reflect development already underway or sites capable of delivering housing in the short to medium term.

For example, it has been put to HIA that some precincts in the draft Plan incorrectly identify land as being unsuitable for development until 2036 at the earliest, despite the provision of the required infrastructure. HIA recommends that the sequencing assumptions of the draft Plan be reviewed, including the assessment criteria and the supporting Infrastructure Delivery Plan.

The sequencing framework should:

- recognise projects already underway and sites capable of near-term delivery;
- ensure land that cannot presently be serviced is not prioritised over development-ready sites;
- use accurate and current servicing, market and development information; and
- avoid relying on the out-of-sequence process as a substitute for accurate sequencing at the outset.

Whilst the draft Plan makes reference to the provision of "out-of-sequence" mechanisms, HIA is concerned that content within plans, and supporting documents, such as this are commonly interpreted in a statutory fashion by NSW governments department, agencies or council officials.

In which case, it is possible that despite the best of intentions, that sites capable of development in the near term may be held back. This is particularly the case if future policy decisions restrict the use of such a mechanism. HIA's preferred outcome is the use of accurate sequencing from the outset, rather than dependence on an exception process.

2. Consultation and industry engagement

HIA has received mixed feedback regarding the Inquiry by Design workshops. Participants reported that they felt the consultation was ticking a box and concerns that workshop findings were not properly analysed. This has contributed to industry concerns regarding possible shortcomings in the proposed scope, staging and sequencing.

Before finalising the Plan, the councils and NSW Department of Planning should collaborate directly with HIA, other industry associations such as UDIA and PCA, landowners and developers to:

- identify projects already underway and sites capable of near-term delivery;
- road-test the Plan against current market, servicing and development conditions;
- review the underlying evidence and assumptions; and
- develop practical solutions to identified infrastructure and sequencing constraints.

Landowners should also be given meaningful access to the underlying data and methodology so they can test assumptions, identify errors and participate effectively in this review.



3. Data accuracy and infrastructure mapping

Although the supporting work is comprehensive, following industry feedback HIA is concerned about the accuracy and currency of some underlying data, including Hunter Water servicing and wastewater mapping.

HIA has been advised that mapping used in some precincts is not up to date and as a result mapping errors may affect the staging assumptions in the Infrastructure Delivery Plan and the assessment criteria outcomes.

The responsible councils, agencies and infrastructure providers should verify the data before the final Plan is released. Industry submissions should be carefully considered so errors do not become embedded in the Plan or lock out projects that are ready to proceed.

4. Infrastructure coordination and funding

HIA strongly supports planning infrastructure alongside growth rather than after housing is delivered. The scale of investment identified for the growth area reinforces the need for firm government commitments and disciplined prioritisation.

The final Plan should distinguish state, regional and local infrastructure; identify the responsible delivery body; and state the proposed funding mechanism and delivery window. Land should not be rezoned without a credible pathway for essential water, wastewater, roads, public transport, schools and community infrastructure.

Infrastructure costs must not be transferred disproportionately to new-home buyers. Contributions and planning agreements should be transparent, predictable, evidence-based and directly related to the development generating demand. Payments should be aligned with delivery and occupancy, rather than required so early that they undermine project feasibility and housing affordability.

5. Governance and approvals

A single, coordinated implementation framework is required across three councils and multiple state agencies. Different technical standards, contribution approaches and approval expectations would increase cost, delay and uncertainty.

HIA recommends a formal implementation group comprising the three councils, relevant NSW agencies, infrastructure providers and industry representatives. Its role should include resolving cross-boundary issues, monitoring infrastructure commitments, coordinating precinct investigations and publishing an annual delivery report.

The councils should pursue common requirements, shared technical specifications and parallel assessment processes wherever practicable. Strategic planning, rezoning, biodiversity assessment and infrastructure design should be undertaken concurrently where this can reduce overall lead times without compromising proper assessment.



6. Housing choice and development feasibility

The Structure Plan should facilitate a broad mix of detached homes, medium-density housing and other appropriate forms that respond to household needs and market demand. Detailed controls should be established through precinct planning and should not prescribe uniform outcomes across a large and varied growth area.

Future controls must be tested for cumulative effects on lot yield, construction cost and affordability. Minimum lot sizes, setbacks, landscaping, design requirements and sustainability measures should remain practical, avoid duplication with the National Construction Code and permit efficient contemporary housing products.

8. Regional integration and endorsement

The findings and identified growth areas must be incorporated into the Central Coast and Lower Hunter Plan whilst it is currently being developed.

The NSW Department of Planning should endorse the Structure Plan and its development footprint to provide certainty and support implementation.

Without formal endorsement, clearly assigned responsibilities and a funded delivery pathway, there is a risk that the report will not translate into action. Endorsement should therefore be accompanied by governance, infrastructure and monitoring commitments.

9. Monitoring and review

The final Plan should include measurable indicators for rezonings completed, development-ready land, lots approved, dwellings completed, infrastructure delivered and approval timeframes. Results should be reported publicly each year. A formal review should occur at least every five years, with earlier intervention where delivery materially falls behind the adopted program.

10. Housing supply and regional growth

Greenfield development is needed to complement infill housing and provide a sustained supply of affordable sites and a diversity of housing types and price points.

As part of a polycentric region, the Anambah to Branxton growth corridor can better connect housing with employment across the Lower Hunter. The region is experiencing substantial internal and overseas migration across age groups. Compared with Newcastle and coastal local government areas, the Lower Hunter currently offers larger areas of relatively affordable land and housing options, making it particularly attractive to families and other growing demographic groups.

The final Plan should therefore treat timely greenfield land release as an essential component of regional housing supply, rather than a residual option after infill opportunities.



Conclusion

HIA supports a robust and enduring Anambah to Branxton Structure Plan, but it must be based on accurate and current evidence. It should facilitate projects capable of delivering housing in the near term rather than constrain them through potentially incorrect mapping, unsupported assumptions or inappropriate sequencing.

Subject to the amendments recommended in this submission, HIA supports the draft Plan as an important foundation for long-term growth in the Hunter. Its success will depend on formal government endorsement, funded enabling infrastructure, meaningful industry engagement, coordinated approvals and a transparent delivery program.

We thank Council for considering these comments. I would be pleased to discuss any of the issues raised in this submission and can be contacted by email at c.jennion@hia.com.au or by phone on (02) 4014 2006.

Yours sincerely,

HOUSING INDUSTRY ASSOCIATION LIMITED

Craig Jennion
Executive Director - Hunter