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From: system@acelo.com on behalf of Cyril Giraud [REDACTED]
Sent: Friday, 2 November 2018 5:10 PM
To: [REDACTED]
Subject: Submission Details for company Holcim (Australia) Pty Ltd (org_comments)
Attachments: 292221_Holcim_Submission Letter_Final.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

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Content:
The submission letter prepared by Willowtree Planning on behalf of Holcim (Australia) has been attached as a PDF.

IP Address: - 203.58.15.138
Submission: Online Submission from company Holcim (Australia) Pty Ltd (org_comments)
https://majorprojects.acelo.com/?action=view_activity&id=292221

Submission for Job: #9552
https://majorprojects.acelo.com/?action=view_job&id=9552

Site: #0
https://majorprojects.acelo.com/?action=view_site&id=0

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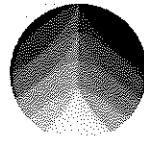
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RE: SUBMISSION TO WESTERN SYDNEY AEROTROPOLIS LAND USE AND INFRASTRUCTURE IMPLEMENTATION PLAN: STAGE 1 – INITIAL PRECINCTS

Dear Brett,

This submission has been prepared by Willowtree Planning on behalf of Holcim (Australia) (Holcim) in relation to the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan: Stage 1 – Initial Precincts (LUIIP). The submission responds to the public exhibition of the LUIIP dated 21 August 2018 and considers the overall impact of the LUIIP in respect of the potential for the future development of land for 'general industry' (concrete works).

In summary, Holcim objects to the LUIIP in relation to the designation of non-urban land in the South Creek precinct as the extent of land mapped as environmental is unreasonable and unwarranted. The designation would result in detrimental impacts on the development potential of land within the Precinct which is suitable for industrial development, namely concrete works industries. This submission also recommends that 'general industry' (concrete works) be included as a type of permissible development within the initial precincts to support development and construction activities of the Aerotropolis in the future. Furthermore, an out-of-sequence proposal is likely to be undertaken to support the operation of the concrete works industries within the Aerotropolis, which would strengthen the ability of the Aerotropolis to be Greater Sydney's newest economic hub.

In summary, the main points of this submission are as follows:

- 1) The excessive area of potential employment land being designated as non-urban land due to the adoption of the Probable Maximum Flood (PMF) line within the South Creek Precinct. It is noted that the arbitrary extent of the Precinct would result in the loss of valuable employment generating land that is suitable for a wide range of industrial land uses, including concrete works. Additionally, the opportunity cost of not making land available for such purposes would place an undue burden on existing and future road infrastructure which is undesirable from an environmental standpoint.
- 2) The inclusion of 'general industry' (concrete works) as a permissible land use upon release of the final Plan and the proposed State Environmental Planning Policy – Western Sydney Aerotropolis (the SEPP) is deemed to be a suitable and desirable response to the vision of the Aerotropolis. This is particularly evident as the provision of concrete works would assist to ensure the effective delivery and provision of essential materials for construction and development projects.
- 3) Given that 'general industry' (concrete works) are not currently incorporated within the LUIIP as a potential land use, an out-of-sequence proposal is likely to be undertaken in order to facilitate development of the concrete works industries in the Aerotropolis. Whilst being consistent with the objectives and visions of the LUIIP, *A Metropolis of Three Cities* and the *Western City District Plan*,



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the undertaking of out-of-sequence development relating to the concrete works industries is considered to provide an innovative solution to the growth of the Aerotropolis.

The above matters are addressed in the subsequent sections hereunder:

1. Holcim (Australia) Pty Ltd

Holcim (Australia) (Holcim) is a leading supplier of aggregates, concrete (readymix), concrete pipe and products, and has been supplying construction materials in Australia since 1901. As one of the largest suppliers in the industry, Holcim supplies concrete from a network of more than 250 concrete plants, 900 mixer trucks, 12 precast concrete factories and mobile and on-site facilities across Australia. The operation of 65 quarries is also dedicated to providing consistent and high-quality products for various customers and applications.

Given the progressive delivery of transport services and infrastructure across the Western Sydney Aerotropolis, Holcim intends to expand its operations of the business in the area to facilitate the supply of construction materials. The planned business expansion is considered to contribute essential to facilitate a wide range of development opportunities, to assist in the provision of employment and housing opportunities, consistent with the objectives of the LUIIP.

2. Western Sydney Aerotropolis

The LUIIP identifies nine precincts in the Aerotropolis being the following:

- Aerotropolis Core
- Northern Gateway
- South Creek
- North Luddenham
- Rossmore
- Mamre Road
- Kemps Creek
- Badgerys Creek
- Agriculture and Agribusiness Precinct

Stage 1 of the LUIIP focuses on the three initial precincts (Aerotropolis Core, Northern Gateway and South Creek) to identify the opportunities for economic growth and the provision of open space in the Western Parkland City. While the Aerotropolis Core and Northern Gateway will be the focus of economic development, the South Creek precinct will be provided with open space and recreation facilities along the green spine. **Figure 1** below illustrates the Structure Plan of the Aerotropolis.

The LUIIP is underpinned by the following goals and principles:

- 1. Productive** - *The Aerotropolis will be an accessible, innovative 24-hour city, connected globally, nationally, locally and digitally, and a prime location for investment. The Aerotropolis will make a significant contribution to 200,000 jobs for Western Sydney, creating an innovation precinct and a home for technology, science and the creative industries.*
- 2. Compact and connected** - *A compact urban form will minimise the urban footprint, preserve environmentally valuable lands and allow for a diversity of housing within 10 minutes of centres and five minutes of parks and open space.*
- 3. Liveable** - *A diversity of jobs and homes, including affordable housing, high-quality public transport, vibrant urban centres and unique amenity, creativity and recreation will attract a new, highly-skilled and diverse community.*

- 4. Sustainable** - *Planning in each of the Aerotropolis's precincts will create opportunities to introduce aspirational energy and water solutions, and sustainable approaches to the creation of public areas, new built form and social infrastructure.*
- 5. Aligned with infrastructure and funding** - *Sequenced precinct planning will align population and economic growth, with the planning and construction of new transport, services and community facilities for residents and workers. The timely and efficient provision of enabling infrastructure is a key consideration to activate precincts. In the context of the major investments by the Commonwealth and NSW, particularly in Stage 1 of North-South Rail Link, the use of additional value sharing mechanisms will also be considered. This plan represents the beginning of a discussion regarding the potential mechanisms available to the government while the specifics of potential and practical value sharing mechanisms will be explored and developed for reporting in the second state of the Land Use Plan.*
- 6. Compatible with a landscape led approach to urban development** - *South Creek and its tributaries will shape an open space network that combines recreation, stormwater management and biodiversity, making water an important part of the Aerotropolis's character. As one of the warmest parts of Greater Sydney, where heat can influence the health and lifestyle of residents and workers, the Aerotropolis will be planned around the network of waterways to create greater environmental, social and amenity benefits. This includes responses to mitigate urban heat, flooding and intense storm events and locating noise sensitive land uses in areas considered acceptable to liveability outcomes to allow unencumbered airport operations.*

By permitting 'general industry' (concrete works) within the Aerotropolis, there would be a significant contribution made to realising the goals and principles outlined above. The co-location of such facilities would ensure that future construction projects within the Aerotropolis would benefit from the timely delivery and resourceful services offered by Holdim. It is acknowledged that this would also reduce the burden on road infrastructure within Western Sydney, while creating employment opportunities for the local communities.

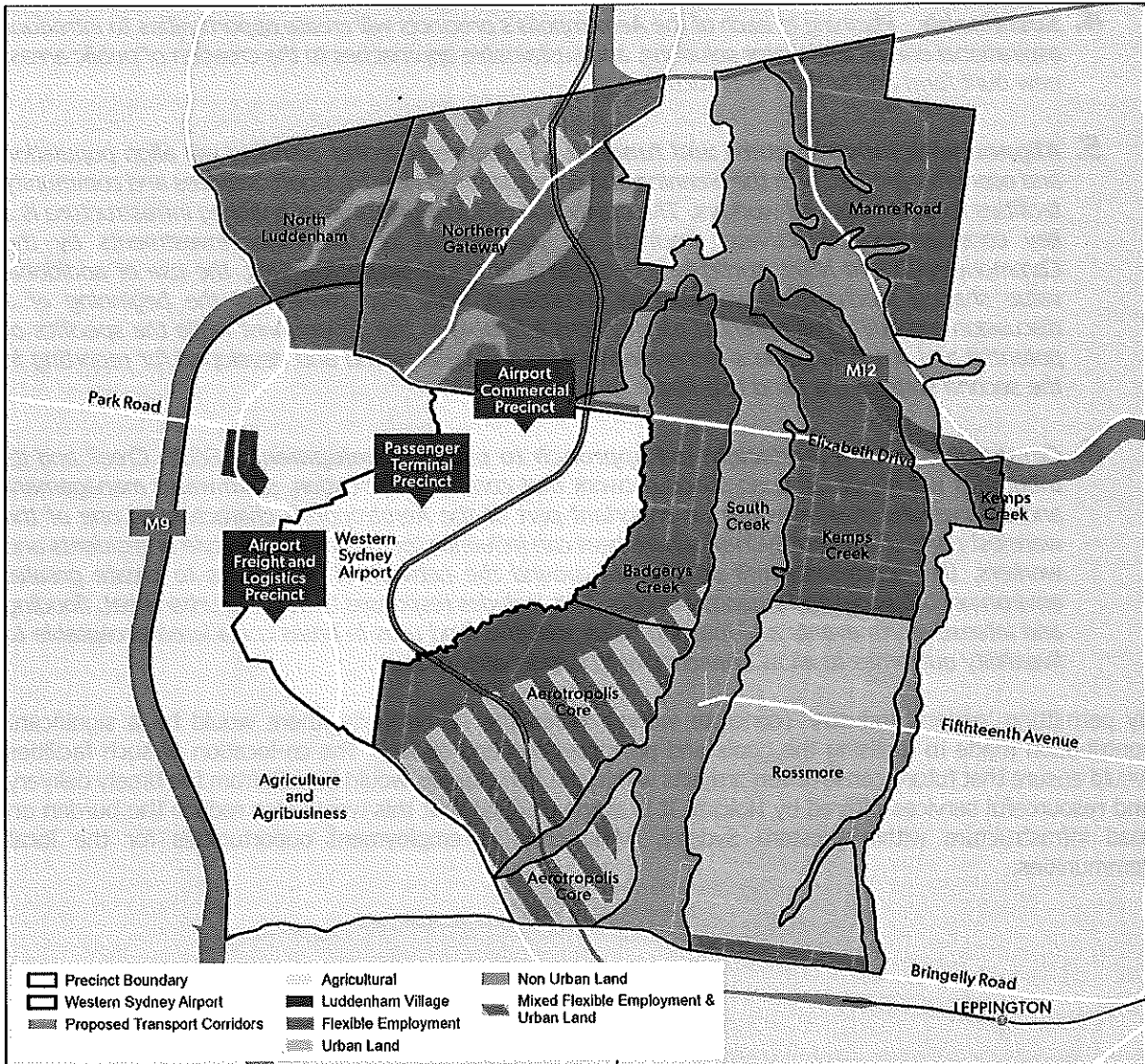


Figure 1 Western Sydney Aerotropolis Structure Plan (NSW Department of Planning and Environment 2018)

3. Intention of Holcim

To expand the operation network of the business for concrete works, Holcim intends to acquire several land parcels currently located within the Aerotropolis Core, Badgerys Creek, South Creek and Kemps Creek precincts. The land use definition under the Standard Instrument which most suitably characterises the operation of concrete works consistent with the Holcim business is a 'general industry' which is defined as:

general industry means a building or place (other than a heavy industry or light industry) that is used to carry out an industrial activity.

industrial activity means the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity.

It is noted that any future proposal would trigger the designated development provisions under Schedule 3 of the *Environmental Planning and Assessment Regulation 2000*.

14 Concrete works

- (1) *Concrete works that produce pre-mixed concrete or concrete products and:*
 - (a) *that have an intended production capacity of more than 150 tonnes per day or 30,000 tonnes per year of concrete or concrete products, or*
 - (b) *that are located:*
 - (i) *within 100 metres of a natural waterbody or wetland, or*
 - (ii) *within 250 metres of a residential zone or dwelling not associated with the development.*
- (2) *This clause does not apply to concrete works located on or adjacent to a construction site exclusively providing material to the development carried out on that site:*
 - (a) *for a period of less than 12 months, or*
 - (b) *for which the environmental impacts were previously assessed in an environmental impact statement prepared for that development.*

Therefore, any future proposal would be subject to obtaining Secretary's Environmental Assessment Requirements (SEARs) and the preparation of an Environmental Impact Statement (EIS). This framework would ensure that all environmental matters are sufficiently addressed and mitigated to minimise land use conflict. In this respect it is also noted that Holcim apply leading edge industry practices and have a proven track record in achieving exceptional sustainability outcomes.

4. Extent of the Non-Urban Land and its Associated Impacts

While the provision of non-urban land within the South Creek Precinct aims to provide a green space corridor, the extent of the precinct is considered to be arbitrary and unwarranted. As demonstrated within LUIIP, it is apparent that the Probable Maximum Flood (PMF) line has been adopted to establish the boundaries of the South Creek Precinct. This is not considered a reasonable approach in that the 1 in 100 AEP is most commonly adopted for development purposes as stated in the following publicly available documents:

- A. Department of Planning Circular PS 07-003 dated 31st of January 2007.
- B. Australian Institute for Disaster Reliance's Flood Information to Support Land Use Planning (2017).
- C. Managing Flood Risk Through Planning Opportunities – Guidance on Land use Planning in Flood Prone Areas.

The Floodplain Development Manual 2005 is also explicit with respect to the permissibility of development in the floodplain which states:

"The primary objective of the NSW Government's Flood Prone Land Policy is to reduce the impact of flooding and flood liability on individual owners and occupiers of flood prone property, and to reduce private and public losses resulting from floods. At the same time, the policy recognizes the benefits flowing from the use occupation and development of flood prone land.

The policy promotes the use of a merit approach which balances social, economic, environmental and flood risk parameters to determine whether particular development or use of the floodplain is appropriate and sustainable.

In this way the policy avoids the unnecessary sterilization of flood prone land. Equally, it ensures that flood prone land is not the subject of uncontrolled development and inconsistent with its exposure to flooding".

This is also supported explicitly by The Greater Sydney Commissions (GSC), which states:

"Managing flooding is an important priority for communities across the Western City District. The NSW Government has developed the Floodplain Development Manual 2005 to guide development on areas at risk of flooding. Councils are responsible for managing flood risk in their local government areas and typically impose flood related development controls in areas below the 1 in 100 chance per year flood level.

In the case of the Hawkesbury-Nepean Valley, the significant depths between the one in 100 chance per year flood and the probable maximum flood, mean a risk-based approach that considers the full range of flood sizes is more appropriate"

Accordingly, the designation of the boundaries of the South Creek Precinct based on the PMF flood event would result in a significant loss of potential employment land, which would be detrimental to the delivery of employment opportunities and the economic growth of the Aerotropolis. The unreasonable designation of the South Creek Precinct would also limit the supply of developable land to the market, which is already experiencing a severe undersupply.

5. The Inclusion of 'Concrete Works' as a Permissible Land Use in the final LUIIP and the SEPP

This submission recommends that development for the purpose of 'general industry' (concrete works) be included as a type of permissible development in the Aerotropolis Core, Badgerys Creek and Kemps Creek precincts within the Urban Development Zone under the proposed SEPP. This would ultimately enable Holcim to operate for distribution to the construction industry, particularly construction projects within the Aerotropolis. It is noted that the Aerotropolis Core adjoins the Western Sydney Airport precinct and is anticipated to be one of the major centres of the Aerotropolis. With its location in proximity to planned major public infrastructure, the inclusion of concrete works industries would diversify the land use mix in the Aerotropolis Core and enable industrial development to occur at an advantageous location, which further attracts investment opportunities.

As demonstrated within the LUIIP, the Badgerys Creek precinct will support the operation of the airport through facilitating a range of employment generating uses. With the Badgerys Creek Precinct being located in the vicinity of the proposed Western Sydney Freight Line, M12 Motorway and the M9 Outer Sydney Orbital Corridor, it would form a beneficial location for industrial development, including the concrete works industries.

Furthermore, it is understood that the Kemps Creek precinct is planned for "mixed business development such as smaller innovative and creative industries". However, given its location of being in proximity of the proposed Freight Line and road infrastructure, the precinct is also considered appropriate for industrial development which includes the concrete works industries. The incorporation of industrial development would facilitate the Kemps Creek precinct to be one of the major employment hubs and provide jobs close to where people live (e.g. the adjoining Rossmore residential precinct) and infrastructure, without impacting the amenity and liveability of the residential areas.

6. Out-of-Sequence Proposals

Notwithstanding the above recommendation to include 'general industry' (concrete works) as a permissible use under the proposed SEPP, under the current frameworks of the LUIIP, an out-of-sequence proposal would be required to facilitate development of the concrete works industries in the Aerotropolis. As discussed in the previous sections, the incorporation of concrete works industries is consistent with the goals and principles of the LUIIP and would make a significant contribution to the generation of employment opportunities and the development of the Aerotropolis as an economic hub in Western Sydney. Furthermore, it would also stimulate the productivity of Greater Sydney through the operation of industrial activities and facilitate the Aerotropolis to become an economic catalyst for the Western Parkland City, which are consistent with the objectives and planning priorities of *A Metropolis of Three Cities* and the *Western City*

District Plan.

An out-of-sequence proposal for concrete works industries would not compromise the land use and transport planning for the initial precincts but would rather provide a land use to complement the provision of transport infrastructure in the Aerotropolis. Through undertaking out-of-sequence development relating to the concrete works industries, it would provide an innovative solution to the growth of the Aerotropolis and would be at no cost to the government.

Accordingly, it is recommended that the Department of Planning and Environment be supportive of an out-of-sequence proposal of this nature.

7. Conclusion

In summary, Holcim requests that the following be addressed within the LUIP and/or by the Department of Planning and Environment:

1. Permissibility of 'general industry' (concrete works) within the Aerotropolis;
2. Reduction of the extent of the South Creek Precinct boundary to enable more developable land for industry; and
3. Support to out-of-sequence proposals relating to the concrete work industries to enhance the economic growth of the Aerotropolis.

For the reasons stated above, the operation of concrete works is essential to support the growth and development of the Aerotropolis in a sustainable and efficient manner. The colocation of Holcim operations in close proximity to future construction projects will serve to benefit the public interest and achieve the goals set out in the LUIP.

Should you wish to discuss the matters addressed in this submission, please contact the undersigned.

Yours faithfully,



Chris Wilson
Managing Director
Willowtree Planning

