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Q1

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Q2

Submissions may be made public (including full name, organisation name and postcode only). You can choose to publish your submission anonymously (using your postcode only). Please select from the options below:

My submission can be made public (with my full name, organisation name and postcode published)

Q3

What has been your experience with the retain and manage industrial lands policy?

Respondent skipped this question

Q4

What has been your experience with the review and manage industrial lands policy?

Respondent skipped this question

Q5

What suggestions would you make for industrial lands policy in the Greater Sydney Region Plan?

Respondent skipped this question

Q6

Are there any barriers to industrial lands fulfilling their functions?

Respondent skipped this question

Q7

Respondent skipped this question

From your perspective, what would be the most productive way to manage industrial lands? What are the opportunities to make industrial areas more productive?

Q8

Respondent skipped this question

Are there particular locations in Greater Sydney that are most appropriate to transition to alternative uses for industrial lands? Why?

Q9

Respondent skipped this question

Are you aware of any new types of industrial or urban services uses occurring in industrial areas?

Q10

Respondent skipped this question

Please provide any further comments below

Q11

Would you like to attach a document?

Industrial Lands Review CCAA Final.pdf (249.9KB)

26 August 2021

Mr Geoff Roberts AM
Chief Commissioner
Greater Sydney Commission
PO Box 257
PARRAMATTA NSW 2124

Dear Mr Roberts AM

Industrial Lands Policy Review

Thank you for the opportunity to participate in the Greater Sydney Commission's (GSC) Industrial Lands Policy Review and comment upon the Retain and Manage Policy for Industrial and Urban Services Lands under the Greater Sydney Region Plan (GSRP).

This review responds to Recommendation 7.5 of the NSW Productivity Commission's White Paper to *evaluate the retain-and-manage approach to managing industrial and urban services land in Greater Sydney against alternative approaches, to identify what would maximise net benefits to the state and to adopt the approach that maximises the State's welfare in the next update to the GSRP.*

Cement Concrete & Aggregates Australia (CCAA) is the peak industry body for cement manufacturers, concrete suppliers and extractive operators throughout New South Wales. Collectively known as the heavy construction materials industry, our members are engaged in the quarrying of sand, stone and gravel, the manufacture of cement and the supply of pre-mixed concrete to meet New South Wales's building and construction needs. These businesses range from large global companies to SMEs and family operated businesses.

Cement, concrete, stone and sand are the critical materials that enables the \$56 Billion New South Wales construction industry, employing 370,000 workers and contributing 45% of the New South Wales taxation revenue base. CCAA notes that the COVID-19 pandemic has had a significant impact upon the economy of New South Wales and the construction sector, supported by an efficient heavy construction materials supply chain is playing a pivotal role to help deliver an economic rebound.

As highlighted in the Policy Review Summary Background, Industrial and urban services lands play a critical role in supporting the Greater Sydney economy. A lack of co-ordinated city-wide planning for the management of industrial and urban services land has seen the rezoning of this land for other purposes (such as residential), placing pressure on current and future land use.

CCAA notes and supports the intent of Objective 23 of the **Greater Sydney Region Plan: A Metropolis of Three Cities (GSRP)**¹ with regards to lands covered by the Retain and Manage policy

¹ [greater-sydney-region-plan-0618.pdf](#) – Objective 23 – Page 128 - Productivity

which states: all existing industrial and urban services land should be safeguarded from competing pressures, specifically residential and mixed-use activities.

Increasingly, we are seeing areas rezoned allowing new developments with greater density being constructed adjacent to critical concrete batching plant facilities, particularly within the **City of Sydney** and other Inner Sydney Local Government Areas (LGA). While we are understanding and appreciative of density or zoning targets that are placed upon Local Governments by the Department of Planning, Industry and Environment, far too often we are seeing encroachment on these critical facilities with the false presumption that the batching plant would be removed or relocated at a future date and time.

Concerns have also been raised from within our industry that DPIE's recent Employment Zones Reform consultation may inadvertently have the effect of encouraging development, which is not compatible with concrete batching plants, in the only zoning available for this purpose, thus placing further pressure on existing plants while also making it difficult to obtain future approvals.

Outside of the inner city, the future **Western Sydney Aerotropolis** which will drive significant growth for infrastructure requirements for road, rail, commercial and residential development over the next two decades in Sydney's South West, also requires a large number of new batching plants to be located nearby. Careful planning and clever use of industrial land zoning is vital to delivering this outcome.

Associated infrastructure such as ports, rail access, depots and plants are also fundamental to the success of our sector. A facility such as the **Clyde Intermodal Terminal** in Western Sydney is a key piece of infrastructure that enables enhanced use of rail for the transportation and transfer of construction materials. Such an operation assists to reduce many hundreds of daily truck movements and helps to not only reduce emissions, but also with congestion on local and arterial roads.

Port Infrastructure is another important and viable option for the transportation and transfer of bulk heavy construction materials. CCAA has recently put together a submission on the Bays West Strategy Precinct which includes the **Glebe Island** port and batching plant facility and has called for the ongoing operation to be protected and not be devalued by surrounding land use mixes.² A copy of our Bays West Strategy submission is attached.

As you will no doubt be aware, the delivery of concrete must be efficient and time critical to avoid spoiling and wastage. Australian Standard (AS1379) states that not only must concrete conform to strength and uniformity but it is also required to be discharged within 90 minutes from the commencement of mixing, or before proper placement and compaction of the concrete can no longer be achieved, whichever comes first³.

² [Bays West State Significant Precinct - \(nsw.gov.au\)](https://www.nsw.gov.au/bays-west-strategy-precinct)

³

https://www.ccaa.com.au/imis_prod/documents/Library%20Documents/CAA%20Technical%20Publications/CAA%20Guides/CCAAGUIDE2007-T53-HousingWEB.pdf

A significant factor in achieving the 90-minute standard and efficient concrete transportation and delivery is the location of batch plants in central locations throughout major metropolitan centres such as Sydney. Given Sydney's size, scale and congested transport routes and challenges with obtaining access to local roads, it would simply be impossible to transport and deliver concrete to most construction sites if batching plants were located wholly on Sydney's outskirts.

Additionally, TfNSW are increasingly requiring a more stringent 60-minute requirement for the delivery of concrete standard for certain mixes. This means that concrete delivered in peak hours effectively needs to be sourced from batching plants within a few kilometres of projects or delivery points.

The new impetus on the Circular Economy and other environmental pressures continues to place pressure on the location and size of batch plant operations. The greater use of recycled water and the creation of products such as recycled glass ensures that today's plants need to be larger in size to accommodate additional material storage bins, silos and water storage.

In summary, CCAA is keen to ensure that the **Retain and Manage** Policy is strengthened to ensure that critical pieces of infrastructure such as Concrete Batching Plants are maintained so that they can continue to be located close to where infrastructure projects are constructed. Any reclassification of industrial and urban services land could inadvertently push batching plants towards Sydney's outskirts and well away from the growth in construction site activity, therefore leaving the industry unable to meet the future building and economic demands. As this is not a practical option, new batching plants will have to compete for higher cost land in inner city areas and will in turn equate to concrete, which underpins our built environment, being more expensive than it is today.

We would like to meet with you or a senior representative of the Greater Sydney Commission to discuss this matter in more detail and to ensure that these critical pieces of economic infrastructure for NSW can survive for decades to come. Accordingly, I can be contacted on 0448 848 848 or email Jason.kuchel@cca.com

Thank you in advance.

Yours sincerely,



JASON KUCHEL
State Director, New South Wales & South Australia