



25 January 2018

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Dear Ms Gibson,

Submission Draft Greater Newcastle Metropolitan Plan

This submission has been prepared in response to the exhibition of the draft Greater Newcastle Metropolitan Plan (**GNMP**). The submission has been prepared by Boral Property Group on behalf of Boral Australia (hereafter '**Boral**')

Boral is an international building and construction materials group, headquartered in North Sydney. Boral's competitive position is underpinned by being a market leader in cement and construction materials in Australasia, the BORAL USG Joint Venture plasterboard business in Australia and Asia, and cladding and roof tiles in the USA. This position is supported by a significant portfolio of strategically located sites including the Carrington Asphalt plant and Stockton Quarry which combined employs approximately 55 people.

Boral is supportive of strategic planning that is consistent with the objectives of the *Environmental Planning & Assessment Act 1979* and generates good planning outcomes for the community as a whole. Industry is a necessary part of a healthy functioning society and it is essential that the implementation of the GNMP protects land suitable for industrial purposes now and into the future, being well buffered from conflicting uses and sensitive receivers.

Renewal of the Carrington Precinct

The draft GNMP sets out strategies and actions that will drive development within the Greater Newcastle area in the future. Strategy 1.3 ('**Increase domestic and global trade capabilities at Newcastle Port**') of the draft plan addresses the future strategy for the Carrington Precinct. Under this strategy, the Carrington Precinct has been identified as an emerging tourism gateway centred on the planned cruise ship terminal. The Port of Newcastle, with the support of Newcastle City Council (Council) and the Department of Planning and Environment (DPE), will align planning policies and tools to renew the precinct by converting existing heavy industrial and port land uses to alternatives conducive to the cruise ship terminal (including tourism).

Boral owns and operates the Carrington Asphalt Plant located at 24 Gross Street, Carrington (lot 1 DP 126381). To meet customer demand, Boral recently invested a significant amount of capital undertaking an extensive upgrade of plant in 2013. The site now forms an integral part within Boral's network of asphalt placing operations within the region.

Industrial uses, including Boral's asphalt operations at Carrington, require the freedom to operate in a responsible and environmentally compliant way. However, even when adopting best practice principals, industrial operations are often disruptive to surrounding land uses.

Tourism and recreational uses are by their nature incompatible with general and heavy industrial uses and will put pressure on industry to introduce onerous measures so as to minimise their impact (eg restricting hours of operation). These measures impede existing industrial operations and may undermine the economic viability of industry.

Additionally, the introduction of incompatible land uses may undermine the ability of industry to secure future approval for intensification or expansion as it would need to satisfy the approving authority that its impact on surrounding uses is minimal.

Boral recommends that DPE and Council protect the industrial character of the precinct and the ability of industry to operate free from constraints arising as a result of introducing incompatible land uses such as tourism.

Relocation of heavy industries

The draft GNWP addresses the future direction for heavy industrial uses within the Greater Newcastle area at Strategy 1.6 (**‘Respond to the changing land use needs of the new economy’**). Under this strategy, DPE, working with Council and Lake Macquarie City Council, will review the role of former manufacturing land within the city core to determine alternative uses such as commercial, residential and recreation. Concurrently, it is planned to relocate heavy industries away from these urban built up areas to designated industrial precincts including Tomago and Beresfield-Black Hill.

Boral is supportive of establishing employment areas for heavy industrial to operate free from the pressure of incompatible land use, however the strategy is ambiguous in its implementation. Boral seeks clarity as to the specific extent of land that is earmarked for relocation and the manner in which councils will encourage existing heavy industrial uses to relocate. Boral’s Carrington Asphalt is strategically placed within its network of asphalt plants and has recently undergone substantial upgrades; therefore any compensation to relocate the site would need to be commensurate.

Additionally, Boral operates a number of concrete batching plants throughout the Newcastle local Government area (LGA) nearby to emerging urban areas including Kurri Kurri, Rutherford, Jesmond, and Kooragang. By their nature, concrete batching plants must be located near to urban areas as the lifespan of pre-mixed concrete is short (typically 30-60 minutes). For this reason positioning of concrete plants near emerging urban areas is critical to ensure Boral can meet customer demand.

Boral supports the strategy to ensure an adequate supply of employment lands, including industrial zoned land, in accessible locations near urban centres.

Protection of Biodiversity corridors

The maps within the draft GNWP show biodiversity corridors that sweep across the Greater Newcastle area. One of these corridors covers the vegetation running north through Stockton and Fullerton Cove, which overlays Boral’s Stockton Sand Quarry on Coxs Lane, Fullerton Cove.

In Boral’s experience, broad brush regional based assessments and maps can have unintended consequences due to a reliance on existing regional mapping and aerial photography that has not been verified on the ground. This has been the case in NSW at our Bringelly site where the South West Growth Centres vegetation mapping identified Federally listed vegetation within an approved quarry area and at Greystanes where a planted pine forest was mapped as Cumberland Plain Woodland.

Boral raised this concern in a submission on the Lower Hunter Strategic Assessment in July 2013. If more detailed plans are going to use the GNWP as a base, it is essential that the corridors are ground truthed or compared to detailed current aerial mapping. This will help

ensure other (often competing) land uses such as extractive industry are not incorrectly labelled as being biodiversity corridors and potentially hamper future extraction of important natural resources.

Improved connectivity to airport

A key action of the draft GNWP is for state and local government authorities to protect transport corridors and facilitate improved connectivity to and from the Newcastle Airport. These transport corridors are also used by other industries for heavy vehicle haulage of products, including by the many extractive operations along the Stockton Bight. It is submitted that the planning and funding of improved transport connectivity include the heavy vehicle needs of the other industries that use these arterial roads.

Conclusion

Boral has reviewed the draft GNWP. While Boral supports plans facilitating further growth in housing and improved connections between rural and employment areas, these strategies should not jeopardise key existing industrial operations that support the development of the Greater Newcastle Metropolitan Area. As a significant landholder within the region, Boral recommends that:

- the scheme protects the industrial character of the Carrington Precinct, and that further consideration be given to the impact of the proposed introduction of incompatible land use has upon existing industrial land use;
- that further detail is provided on the location of heavy industry to be relocated and the manner in which it will be sought to relocate these industries to the Precincts of Tomago and Beresfield-Black Hill;
- that, if any detailed plans are to interact with the GNWP as a base, those maps accurately depict what is on the ground or compared to detailed current aerial mapping; and
- that the planning and funding of any improved transport connectivity need to consider the use of heavy vehicles that use these arterial roads.

We are thankful for the opportunity to make comment on the draft GNWP and trust that this submission has provided sufficient information for Boral's recommendations to be included in the final version of the GNWP. We welcome the opportunity to be involved in any further consultation.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Judy McKittrick', with a large, stylized loop at the end.

Judy McKittrick
National Land Development Manager
Boral Property Group