



23 August 2016

Director Regions, Southern
Department of Planning & Environment
PO Box 5475
Wollongong NSW 2520

Boral Property Group
Clunies Ross St, Prospect 2148
PO Box 42, Wentworthville 2145

T: +61 (02) 9033 5300
F: +61 (02) 9033 5305

www.boral.com.au

Sent via email: wollongong@planning.nsw.gov.au

Dear Sir/Madam,

Submission
Draft South East & Tablelands Regional Plan

1. Introduction

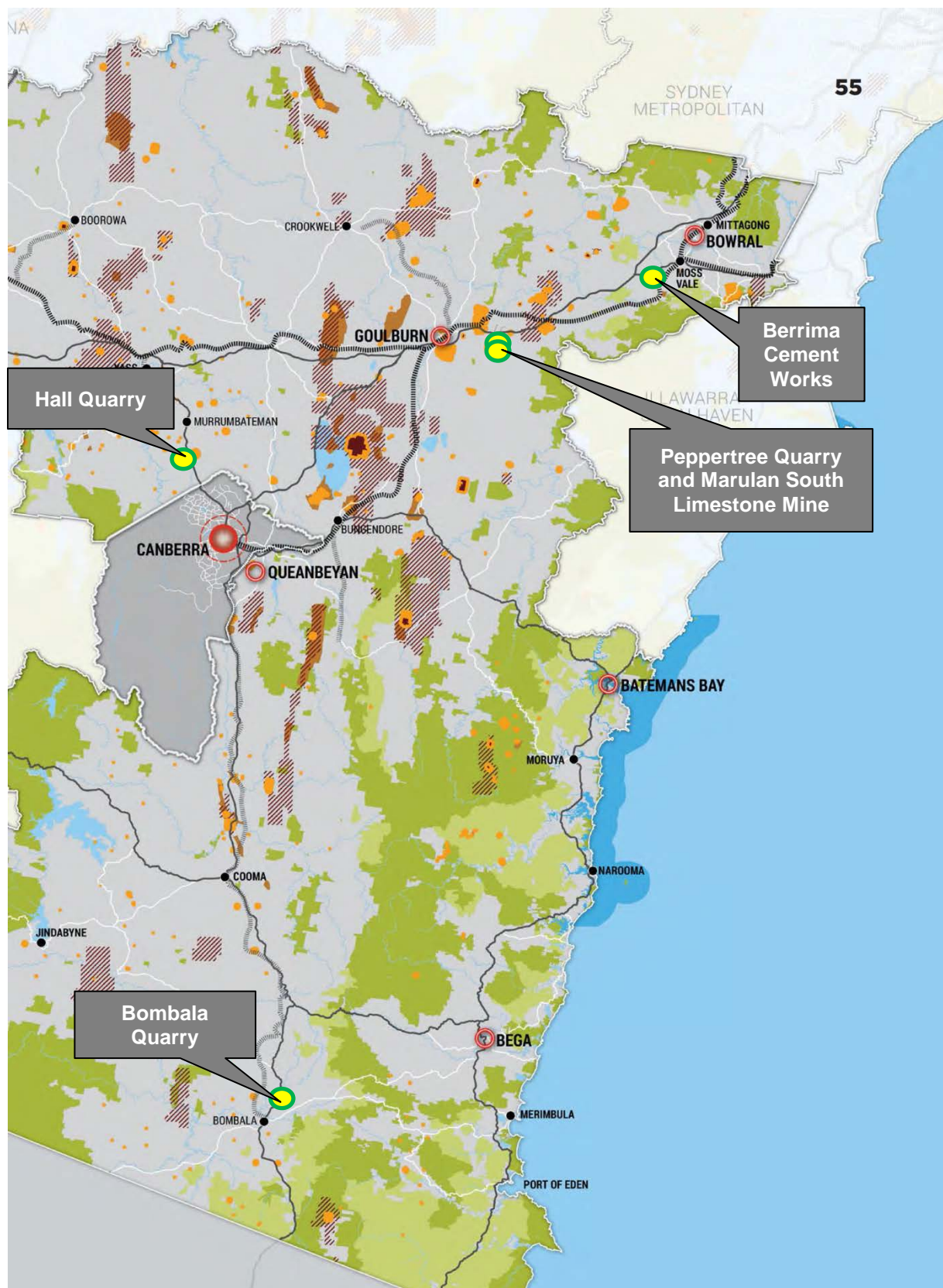
As an owner and operator of strategic assets in the South East & Tablelands Region (hereafter 'the region'), Boral has undertaken a review of the *Draft South East & Tablelands Regional Plan* (hereafter 'Regional Plan').

Boral owns a number of key strategic extractive resource and manufacturing assets in the region (see *Figure 1*) that benefit the region itself, as well as Sydney, the ACT and New South Wales as a whole. Boral's major operations are:

- Peppertree hard rock quarry, Marulan South (Goulburn Mulwaree)
- Marulan South Limestone Mine, Marulan South (Goulburn Mulwaree)
- Berrima Cement Works, New Berrima (Wingecaribee)
- Hall hard rock quarry, Jeir (Yass Valley)
- Bombala hard rock quarry, Bombala (Bombala)

Peppertree hard rock quarry commenced operations in 2014 to replace Boral's Emu Plains Quarry in Western Sydney, near Penrith. The quarry is approved to produce and transport up to 3.5 million tonnes per annum (mtpa) of quarry products, all of which is by rail into Sydney. The quarry represents a \$200 million investment for the future of the Sydney construction materials market, and was located out of Sydney, in part, to minimise landuse conflicts with residential development. Initially approved for a 30 year period in 2007, the hard rock granodiorite resource could support over 100 years of quarrying. The quarry supports 35 full time local employees and represents around 30% of the Sydney construction materials market.

Figure 1: Boral extractive and manufacturing operations in the region



Source: Draft South East & Tablelands Regional Plan page 55



Adjoining Peppertree to the south is the Marulan South Limestone Mine, which has been in operation in various forms since the late 1800's. It holds a significant high grade limestone resource that supplies the cement, steel, agricultural and other industries with limestone and lime based products. It has produced up to 3.38 mtpa of limestone and clay/shale predominantly on rail as well as by road. Its major customer is the Berrima Cement Works, which uses around 2 mtpa of limestone supplied on rail. Boral is currently preparing an Environmental Impact Statement to support a State Significant Development application for the next 30 years of mining. The mine supports 110 full time local employees.

Further north, in the Wingecarribee Shire, is Berrima Cement Works, located in New Berrima, which has been in continuous operation since 1926. The Berrima works has the only cement kiln still manufacturing cement clinker in NSW. The site is approved to manufacture and transport up to 1.56 mtpa of clinker and cement products, which represents around 60% of the products sold in NSW. These products are distributed by road and rail to Sydney and regional NSW customers. The site directly employs 130 local people including engineering and procurement functions.

Hall hard road quarry is located at Jeir, in NSW on the north western edge of the ACT. It is a key resource for the regional NSW and ACT construction materials markets. It is approved to produce and transport up to 500,000 tonnes per annum of quarry products by road.

Bombala Quarry is a small hard rock quarry just off the Monara Highway north of Bombala that is approved to produce and transport up to 100,000 tonnes per annum of quarry products. It is currently in care and maintenance.

Boral is appreciative of the opportunity to provide feedback on the Regional Plan, and outlines below what it believes are keys issues to meet the sustainable growth of the region.

2. The Regional Plans Vision and role of the heavy construction materials industry

The vision of the Regional Plan is as follows:

'The region will build economic opportunities by supporting priority growth sectors including:

- *tourism;*
- *health, disability and aged care;*
- *public administration;*
- *education and training;*
- *primary industries and renewable energy; and*
- *freight and logistics.*

Building a strong, diversified economy will enable the region to respond to environmental, economic and social challenges.'

The Regional Plan then goes on to state four goals:

'To achieve this vision, we have set down the following goals:

- *GOAL 1: Sustainably manage growth opportunities arising from the ACT;*
- *GOAL 2: Protect and enhance the region's natural environment;*
- *GOAL 3: Strengthen the economic opportunities of the region; and*
- *GOAL 4: Build communities that are strong, healthy and well-connected.'*

A key theme throughout the Regional Plan is 'sustainable growth', with 'growth' being mentioned 88 times.

It is therefore critical that the key ingredients and drivers of growth are identified and protected in the Regional Plan. Extractive resources produce cement, concrete and asphalt aggregates, sand, road bases, drainage materials, gabion and ballast that are the building blocks of growth in any region. Around 30% of building costs for any housing and infrastructure project are made up of products originating from these extractive resources. Extractive resources are therefore a key natural resource and their availability and proximity are vital for the sustainable growth of a region.

Given that the northern part of the region is closer to Sydney, Boral submits that Goal 1 should also include growth opportunities from Sydney, not just the ACT. Particularly, as the NSW Government has recently outlined plans for the Greater Macarthur Priority Growth Area, which, adjoins the region to the north.

The sections below respond to the directions and actions in the Regional Plan that Boral believes are important to support future sustainable growth of the construction materials industry.

3. DIRECTION 3.3 Support the productivity and capacity of the region's mineral and energy resource lands

ACTION 3.3.2 Identify energy and mineral resource lands to support sustainable growth of mining industries and diversification of NSW energy supplies

It is noted that maps within the Regional Plan identify extractive resource lands and mineral titles. However, key private rail infrastructure is not identified. Boral recommends that the following private rail lines are identified within maps on the Regional Plan:

- the Berrima Branch Line between the Main Southern Railway at Berrima Junction (Moss Vale) and New Berrima; and
- the Marulan line between the Main Southern Railway at Medway Junction and Marulan South.

Boral was recently issued with a mining lease (ML 1723) for the shale pit at the Berrima Cement Works. It did not appear on the maps for the Regional Plan, presumably due to the timing. It is requested that this mining lease be included in plans for the final document.

ACTION 3.3.3 Protect valuable mineral and extractive resources in the region

The greatest threat to the use of extractive resources is urban encroachment. In Sydney, this has resulted in many operators such as Boral, establishing large quarries hundreds of kilometres away in remote areas like Marulan South, and railing products into Sydney to avoid these conflicts.

Despite provisions within *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007* for consent authorities to consider impacts on adjoining extractive industries, residential dwellings are still being approved by councils without these considerations, or notifying adjoining industry.



Boral seeks greater protection within the strategic planning process, flowing down from regional plans to Local Environmental Plans, to ensure consent authorities consider whether residential development is compatible with adjoining extractive industries, and notify the relevant operator.

4. DIRECTION 4.1 Provide sufficient housing to suit the changing demands of the regions

ACTION 4.1.1 Plan for a range of housing types to cater for changing community needs and household choice

Within the Wingecarribee Shire, the Regional Plan states that the bulk of new residential development will be provided around Bowral. However, this is unlikely to cater for a range of housing types, particularly affordable entry level housing. Boral owns land that adjoins the existing village of New Berrima to the west, that could cater for affordable housing in the future. It is close to the Hume Highway for access into south western Sydney and has good connectivity to Berrima and Moss Vale. Building on existing villages like New Berrima, would provide for a more diverse range of housing types within the shire, and the region. Boral is currently investigating the potential of this land and will be speaking to authorities in the coming months.

5. Conclusion

In summary, given the importance of extractive resources to the sustainable growth of the region, and indeed, NSW and the ACT, Boral recommends the following measures are included in the Regional Plan.

- Goal 1 should include growth opportunities from Sydney.
- Regional Plan maps should show private rail lines to protect their future use and avoid land use conflicts.
- The Regional Plan should have connectivity to the preparation of Local Environmental Plans and other environmental planning instruments to protect extractive industry from encroachment from residential development.
- The Berrima shale mining lease area to be included in maps for the Final Regional Plan.
- New Berrima could be increased in the future for a more diverse range of housing options within the Wingecarribee and the region.

Thank you for the opportunity to comment on the Regional Plan. We would welcome the opportunity to supply further data into the preparation of the final document.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rod Wallace", written in a cursive style.

Rod Wallace

Planning & Development Manager (NSW/ACT)