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19 September 2017

SUBMISSION TO THE NSW DEPARTMENT OF PLANNING & ENVIRONMENT ON THE DRAFT LAND USE AND INFRASTRUCTURE IMPLEMENTATION PLAN FOR WILTON

1.1. Executive Summary

This submission has been prepared in response to the exhibition of the Draft Land Use and Infrastructure Implementation Plan for Wilton. The submission has been prepared by APP Corporation on behalf of Boral Australia ('Boral').

The subject sites are known as 40 – 100 Maldon Bridge Road Maldon, 250 Picton Road, Razorback, and 1359 Menangle Road Razorback ('the sites'), and operates the Maldon Cement Works, Maldon Concrete and Maldon Rail Terminal.

The sites are located in the Wilton Priority Growth Area, which is earmarked for a new town, with potential to accommodate around 15,000 new homes and an additional 40,000 people by 2046. The Wilton Priority Growth Area is in the Greater Sydney Commission's South West District which has been identified as a place where urban and rural lifestyles meet.

Boral submits the following recommendations:

- Acknowledge the importance of providing construction materials and other raw materials to infrastructure and construction projects in a timely manner, and therefore the necessity of preserving industrial lands within employment lands;
- Prohibit sensitive receptors near existing industrial land uses and future employment lands;
- Require non-industrial uses to demonstrate and satisfy compatibility with existing industrial uses on employment lands;
- Identify the current industrial area as IN1 General Industrial to allow flexibility for future employment uses;
- Rezone existing RU2 areas to the east of Picton Road to IN1 General Industrial;
- Exclude areas on Boral's private land which are currently not identified in the LEP Biodiversity Map. Identify these as 'Potential Biodiversity' which requires further investigation before the plan is finalised;
- Preserve existing rights of access for freight, by rail and road, associated with Boral's industrial operations. This includes maintaining access to existing rail sidings and supporting completion of the Maldon to Dombarton freight line; and
- Before mining is permitted beneath the sites, there needs to be a comprehensive assessment undertaken to ensure there is no impact on existing or future development and infrastructure, which could jeopardise Boral's future operations, and the safety of staff and plant equipment.

APP Corporation Pty Ltd
ABN 29 003 764 770
Level 7, 116 Miller Street
North Sydney NSW 2060

Telephone +61 2 9957 6211
Facsimile +61 2 9954 1951

allison.smith@app.com.au
www.app.com.au

1.2. Introduction

The Western Sydney Airport will trigger significant growth in the South West District, which will generate demand for building products such as concrete. The anticipated growth for the Wilton area must be supported by construction materials and employment opportunities. It is therefore essential that planning for the area protects industrial uses in employment lands.

This submission provides an introduction to Boral; the site; site description; current and future zoning; employment lands; primary conservation areas; transport infrastructure; underground mining and mine subsidence; and Boral's recommendations for the Plan.

Boral has grown in parallel with Greater Sydney since it was founded in 1946 as Bitumen and Oil Refineries (Australia) Limited (BORAL) at Matraville. Today Boral is a multi-national company, based in Sydney, with interests in every state, territory, and overseas which generates around \$4 billion of revenue annually.

Boral's green-and-gold logo is found on a wide range of products and service offerings. These include aggregates, concrete (Boral and Concrete brands), asphalt, cement, roof tiles, masonry and timber. Last financial year, nearly half Boral's Australian revenues were derived from operations based within NSW.

Boral is underpinned by a significant portfolio of landholdings which includes the Maldon and Razorback sites. The sites are strategically located to enable the fast, integrated servicing of public and private infrastructure needs for which Boral is renowned. Boral delivers beneficial outcomes for many customers including the NSW Government with which Boral has held a long and successful collaborative relationship.

Boral has a very significant interest in the future of Sydney and its surrounds. Its capabilities must be protected not only for the company's interests, but also for their customers who are directly shaping Greater Sydney.

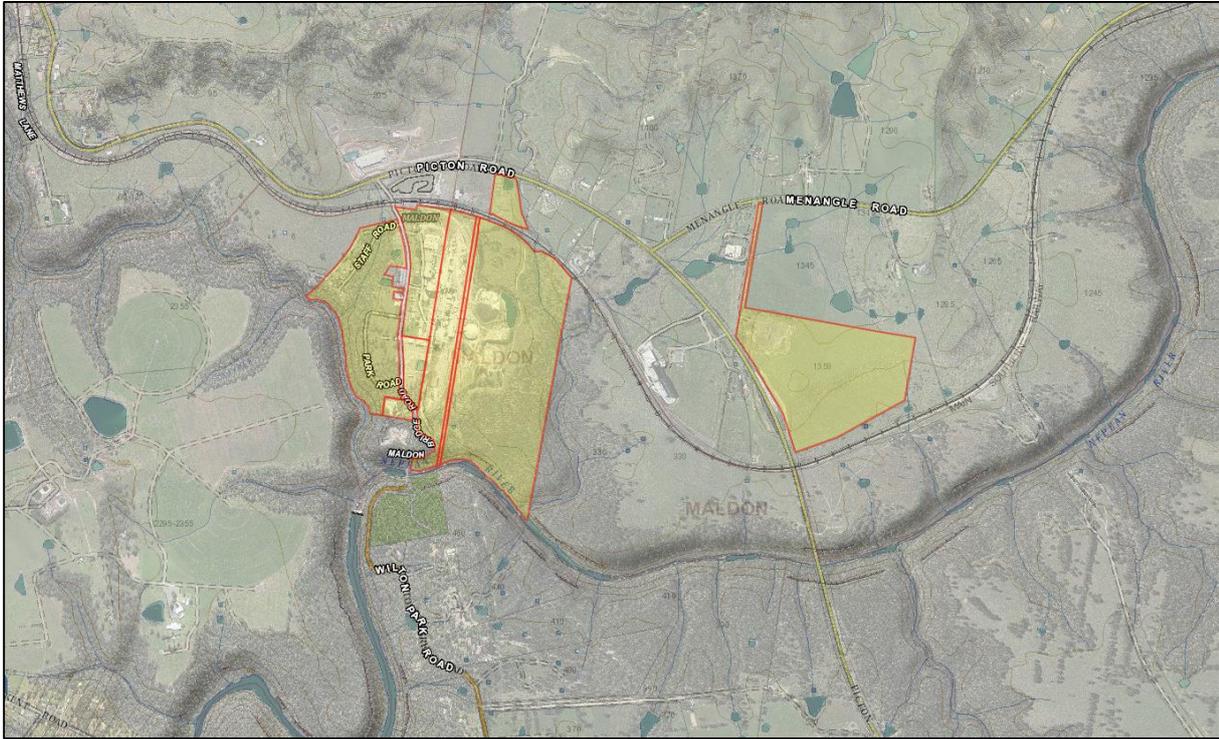
It is essential that the Implementation Plan maintain land suitable for industrial purposes, well buffered from conflicting use by sensitive receivers; to recognise and conserve existing uses.

Maintaining industrial uses in employment land should give thought to the proximity of projected future infrastructure needs, and generally recognise the vitality and necessity of construction materials suppliers to the area's ability to grow.

Accordingly, this submission captures Boral's view of the Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan, currently on exhibition. Boral's perspective is as a landowner and operator which has a key role to play in the delivery of outcomes.

1.3. Site Location

The sites are located to the north of Wilton town centre and the Nepean River, and to the south of Picton Road and Menangle Road (see Figure 1). The Main Southern Railway passes the sites.



Source: SIX Maps
Figure 1: The Boral sites

The sites are located on the northern side of the Wilton Priority Growth Area (see Figure 2).



Source: Implementation Plan
Figure 2: Location of Boral sites in the Proposed Wilton Priority Growth Area

1.4. Site Description

The Boral sites are at 40 - 100 Maldon Bridge Road, Maldon, 250 Picton Road and 1359 Menangle Road, Razorback. The overall landholding is almost 100 hectares which includes a former shale quarry that has been rehabilitated. The sites contains three important operations including:

- The Maldon Cement Works has been manufacturing bulk and bagged cement and associated products since the early 1950s. The site also processes clinker used in the production of cement at the Berrima Cement Works and uses rail for receiving materials from Berrima;
- Concrete batching plant supplying the local Picton area. With the planned development of the Wilton growth area, this plant will be upgraded to meet forecast growth (see Figure 3);
- A rail and road terminal for receiving quarry products from Peppertree Quarry (Marulan) and dispatching by road into the Sydney market. The Terminal, adjacent to the existing Boral Maldon Cement Works and Boral Maldon Concrete plant, sits alongside the Main Southern Railway. It also has ready road access to the Hume Highway via Picton Road.



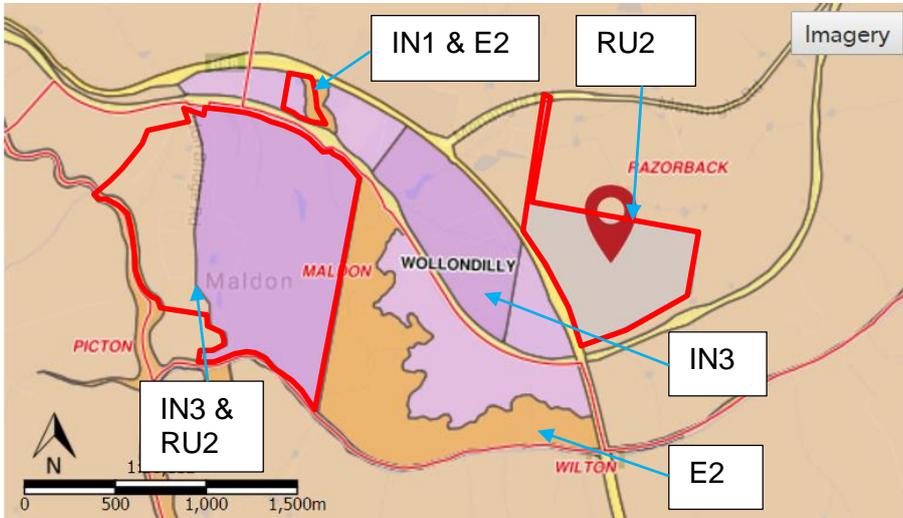
Source: Boral Australia

Figure 3: The Maldon Bridge Road site, as viewed from Picton Road

Together the operations employ over 70 people and the site operates 24 hours, 7 days per week.

1.5. Current and Future Zoning

The sites are currently zoned IN3 Heavy Industry, IN1 General Industrial and RU2 Rural Landscape. Nearby land is zoned RU2 Rural Landscape and E2 Environmental Conservation (see Figure 4), however not all zones are identified in the Implementation Plan figure relating to existing zones (see Figure 5).



Source: NSW Planning Portal

Figure 4: Current Zoning for the sites and surrounds



Figure 5: Existing zoning map which labels IN3 as IN2, does not show IN1 or E2

1.6. Employment Lands

The Boral sites are identified in the Draft Implementation Plan's proposed land uses as employment land or employment land for further investigation (see Figure 6). Boral supports the expansion of employment lands, especially with the area's proximity to the railway, and potential future Maldon to Dombarton freight railway line.

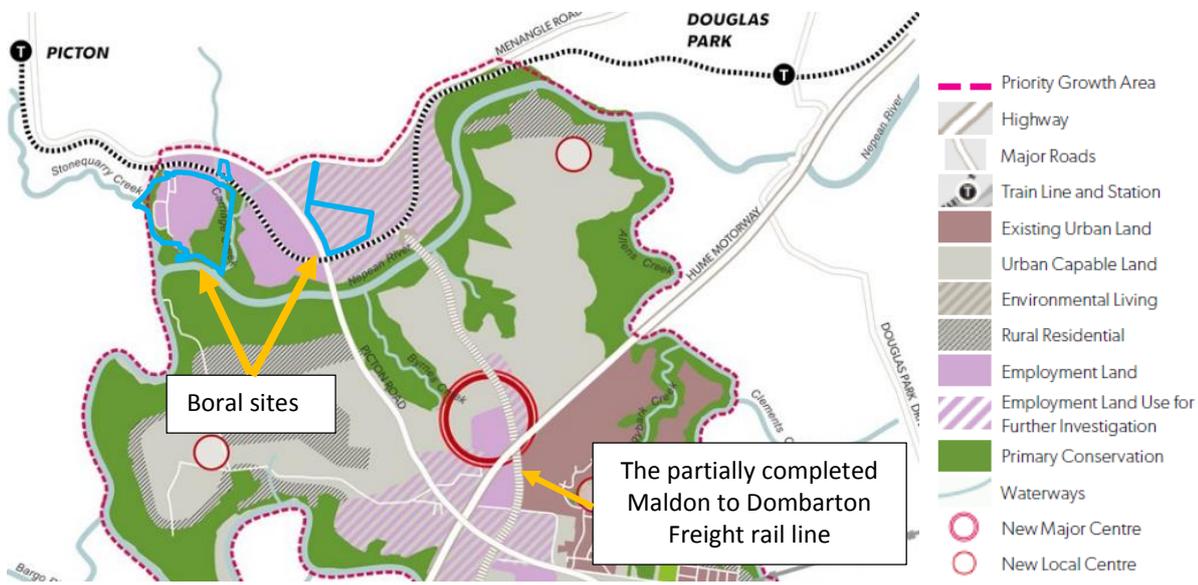


Figure 6: Proposed Land Use Plan with Boral sites highlighted

The existing zonings could be consolidated as IN1 throughout the Maldon/Razorback area to maximise flexibility of use for the area. IN2 Light Industrial might be considered more suitable to locations closer to the new town centre.

The importance of employment lands is recognised in both the Implementation Plan and the Wollondilly Council publication, 'Wilton-A-GREAT-new-town-or-NO-town-at-all-Advocacy-Paper' which states:

TO ACHIEVE THIS WE NEED...

- *Jobs at Wilton that grow as the town grows.*
- *An active working party focusing on job creation and including the main developers.*
- *A clear understanding of what government services will be there in the long term and commitment regarding the timing of these services.*
- *Controls in place that prevent other centres from usurping the long term role of the Wilton town centre.*
- *The NBN in place and other smart city strategies adopted and implemented.*

WHY THIS IS IMPORTANT

In supporting the master plan in 2012, Council expressed its strong support for the provision of transport infrastructure and delivering an employment target of 1 job for each lot generated.

Currently, around two thirds of Wollondilly's employed residents travel outside the Local Government Area to work. Without provision of local employment opportunities this will only increase which has detrimental impacts on our community's social physical and emotional well-being.

Effective and efficient transport links will ensure a community that is well serviced and an attractive location for business investment. This in turn leads to more local jobs.

Failing to provide sufficient local employment opportunities only exacerbates the problems associated with inadequate public transport infrastructure as it consigns future residents to long car commutes to work.

Boral is concerned re-zonings which do not accord with the existing industrial use will limit operations; heavy vehicle movements; and cause issues regarding noise, odour, dust and lighting overspill. Boral supports industrial zones being maintained and potential industrial zones to the east of Picton Road.

1.7. Primary Conservation Areas

The Implementation Plan has introduced biodiversity areas which have previously not been identified as Biodiversity under the LEP (see Figure 7), and are now included in the Implementation Plan's Biodiversity Map (see Figure 8).



Figure 7: Wollondilly LEP Biodiversity Map

The Draft Implementation Plan map shows significantly more areas identified as Biodiversity (see Figure 8).

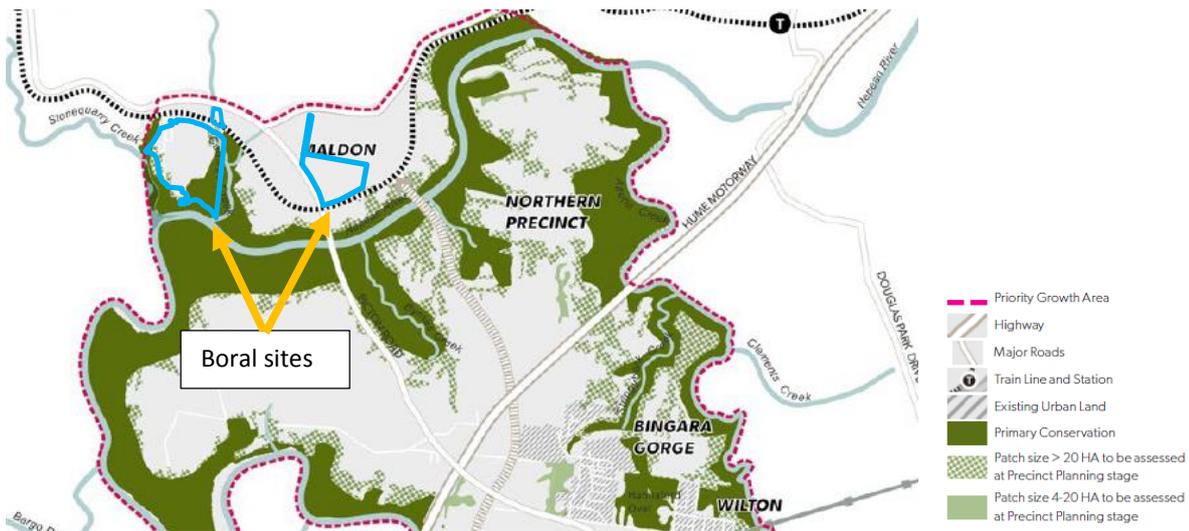


Figure 8: Draft Implementation Plan Biodiversity Map

Boral considers areas marked as Primary Conservation on the Maldon Bridge Road sites, should be re-assigned as Investigation of Potential Conservation or removed altogether. While it is recognised there is a vegetation layer that exists on the site it is inappropriate to label the vegetation as having conservation value without an analysis undertaken of the type of vegetation or the quality of the vegetation.

Changing the category to 'potential' would allow ecological assessment/investigations to be undertaken and plans finalised with the evidence based information to categorise the land as either suitable for conservation, development or other. This is the approach taken elsewhere in the Draft Structure Plan and should be applied to this land.

The Boral site already has areas of >20ha to be assessed at Precinct Planning stage. This could be amended to include the south-eastern portion of the site in addition to western areas nominated (see Figure 9).

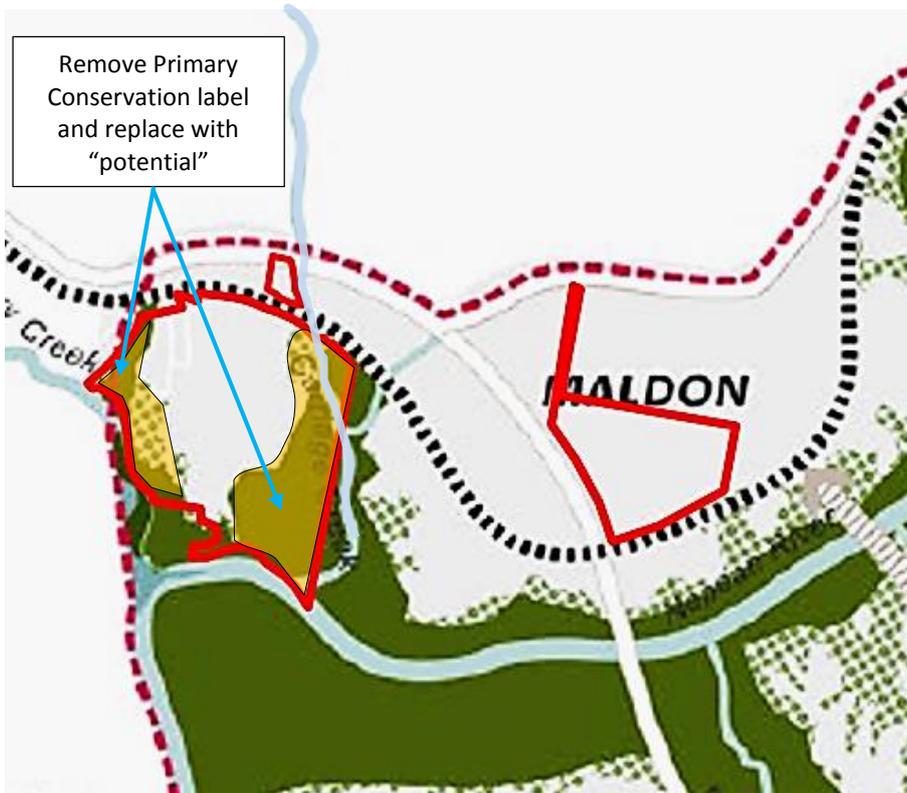


Figure 9: Areas on the Maldon Bridge Road site suggested as 'Potential Biodiversity'

1.8. Transport and Infrastructure

Boral supports the retention of the existing rail corridor for freight, due to the reliance on freight rail from their Marulan quarry and the use of the existing rail sidings on Boral land.

The partially completed/abandoned Maldon to Dombarton rail line would provide alternative opportunities for rail freight and potentially increase capacity on the existing southern rail line.

There might be an opportunity for a railway station as the Maldon Junction which is roughly equidistant from Picton, Douglas Park and Wilton; if a railway station was included at Wilton. No railway station is indicated in either Wilton or Maldon (see Figure 10 on the following page). Additional stations would link existing and future employment lands by rail.

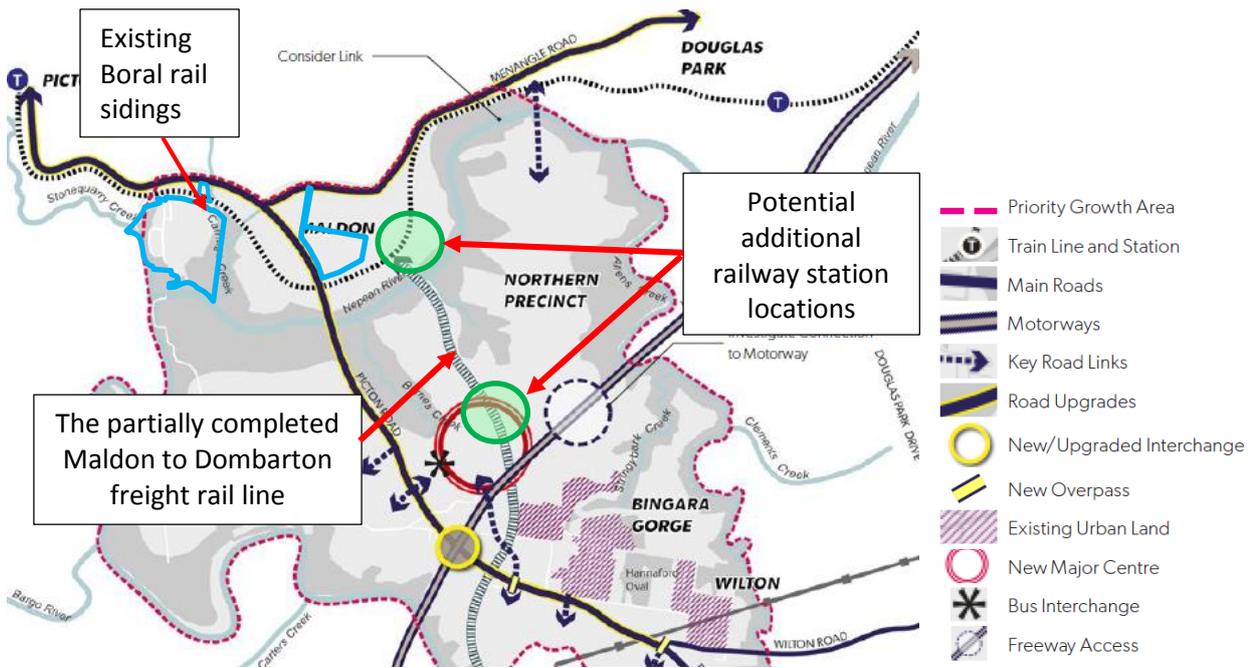


Figure 10: Transport requirements

1.9. Underground Mining and Mine Subsidence

The sites are located where longwall mining might take place in the next 15-30 years (see Figure 11). In our opinion the State Government must resolve the any conflict which will result from underground mining in an existing industrial area and Land Release area. This includes recognising the environmental, social and economic impacts of permitting longwall mining to continue under the Wilton Priority Growth area.

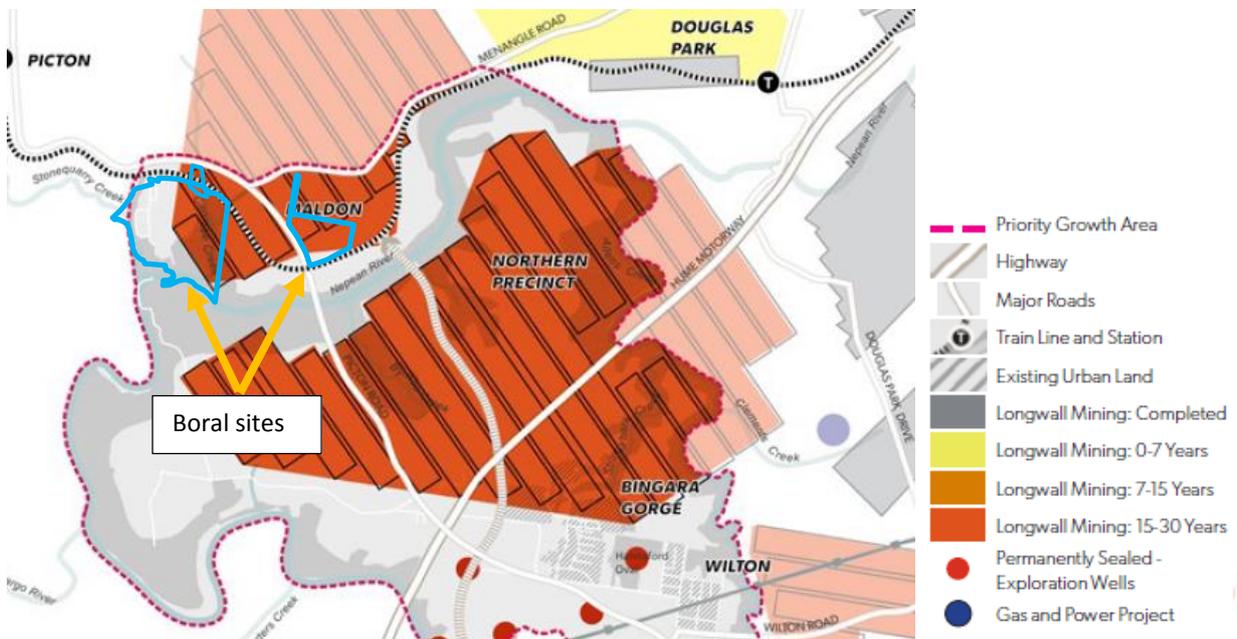


Figure 11: Resources Map showing future Longwall Mining

Before mining is permitted, there needs to be a comprehensive assessment undertaken to ensure there is no impact on existing or future development and infrastructure.

1.10. Recommendations

We respectfully request the following amendments be considered in the final Infrastructure and Implementation Plan for Wilton:

- Acknowledge the importance of providing construction materials and other raw materials to building sites in a timely manner, and therefore the necessity of preserving industrial lands within employment lands;
- Prohibit sensitive receptors near existing industrial land uses and future employment lands;
- Require non-industrial uses to demonstrate and satisfy compatibility with existing industrial uses on employment lands;
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We trust this submission has provided sufficient information for Boral's recommendations to be included in the final version of the Infrastructure and Implementation Plan for Wilton. Should you require further information or clarification on any point, please do not hesitate to call me on

Yours faithfully,
APP Corporation Pty Ltd



Allison Smith