



Western City & Aerotropolis Authority

Ms Melanie Hollis
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Resource Assessments | Planning Services
Department of Planning and Environment
Level 30, 320 Pitt Street

By email: melanie.hollis@planning.nsw.gov.au

Dear Ms Hollis

Introduction

I refer to your invitation for the Western City and Aerotropolis Authority (**WCAA**) to comment on CSR Building Products Limited's (**CSR**) modification applications for its Badgerys Creek Quarry and Brick Making facility (MP 10_0014 MOD 4 & MP 10_0033 MOD 3) (**Proposed Modifications**).

The subject site at 235 Martin Road, Badgerys Creek (**Site**) is at the northern border of the Aerotropolis Core, which is a critical initial development area within the Western City Aerotropolis.

Proposed Modifications

The Proposed Modifications seek significant additions to, and intensification of, the existing operations at the Site, including:

- increased brick production;
- a new 45,275 m² roof tile production facility;
- increase in importation of raw materials from 20,000 tonnes per annum to 339,000 tonnes per annum;
- increase in production from 252,000 tonnes per annum to 432,000 tonnes per annum; and
- establishment of a grid-connected 4.4 megawatt solar farm.

With CSR's requested extended project life of 30 years from approval, the Proposed Modifications represent an extended and intensified industrial use of land adjacent to the intended land use of Aerotropolis Core.

Together with the introduction of new uses to the existing development, in particular, the roof tile facility and the solar farm, the additions and intensifications require a substantial quantitative increase in truck movements from 120 to 544 per day on weekdays, and from 40 to 158 per day on Saturdays. These increases represent a fundamental increase to existing

traffic and traffic-related impacts in the local area, and in areas around the Site, and in the absence of further road development will be of detriment to the precinct.

Assessment of the Proposed Modifications

WCAA understands that CSR has lodged the Proposed Modifications under repealed section 75W of the *Environmental Planning and Assessment Act 1979* pursuant to savings and transitional regulations.

WCAA understands that relevant provisions require the Minister to be satisfied that the proposed concept plan modifications which enable modification of CSR's project approval meet a 'minimal environmental impact', or 'substantially the same' threshold.

If the Minister is satisfied that one of these thresholds applies, such that the Proposed Modifications to CSR's concept plan and project approval can potentially be approved, WCAA considers the Department should assess the following in the context of the *Western Sydney Aerotropolis Stage 1 Land Use and Infrastructure Implementation Plan* and other key policy documentation:

- whether the Proposed Modifications are consistent with the proposed land uses and vision for the Aerotropolis;
- the consistency of the intensified industrial use at the Site in the context of proposed high and advanced technology land uses in the Aerotropolis Core and in future precincts within the Aerotropolis;
- the impact of the significant increase in truck movements not only on current sensitive receivers, but also on future transport and infrastructure planning across the Aerotropolis; and
- the future viability of the transport and haulage routes required to support the intensified operations the subject of the Proposed Modifications for the proposed 30 year period, given the priorities set out for the development of the Aerotropolis.

WCAA considers that the points above are critical in ensuring that any decision in relation to the Proposed Modification demonstrates the promotion of the orderly and economic use and development of land in the Aerotropolis.

If you have any questions in relation to this submission, please contact Troy Harvey, Executive Director – Planning & Development, WCAA at [REDACTED] in the first instance.

Yours sincerely



[REDACTED]

[REDACTED]

16 May 2019

cc. [REDACTED]