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Boral Resources (NSW) Pty Ltd
ABN 51 000 756 507

Level 3, Trinit 2, 39 Delhi Road,
North Ryde NSW 2113
PO Box 6041,
North Ryde NSW 2113

T: (02) 9220 6300
boral.com.au

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Sally Munk
Principal Planner, Industry Assessments
As delegate for the Minister for Planning and Public Spaces
NSW Department of Planning, Housing and Infrastructure
Sally.Munk@dpie.nsw.gov.au

Attention: Sally Munk

Dear Sally

SUBMISSION – 225–245 MARTIN ROAD, BRADFIELD – PROJECT MAVERICK INTERNAL WORKS (SSD-97688711)

1 Executive Summary

Boral Resources (NSW) Pty Ltd (Boral) is the owner of Lot 54 DP 3050 (the Boral Land), which directly adjoins the subject site to the north along a shared boundary. Boral makes this submission in response to the State Significant Development Application SSD-97688711 (Project Maverick – Internal Works) lodged by Goodman Property Services (Aust) Pty Ltd as trustee for the Goodman Western Sydney Trust (the applicant) for the construction, fit-out and operation of a warehouse and distribution estate at 225–245 Martin Road, Bradfield.

Boral does not object in principle to the establishment of a high-quality logistics and warehouse estate at the former quarry site and acknowledges the important role such development plays in activating the Badgerys Creek Precinct of the Western Sydney Aerotropolis. However, Boral raises significant concerns regarding aspects of the proposal that, individually and cumulatively, have the potential to prejudice the development of the Boral Land, impose infrastructure obligations inequitably on Boral, and create unresolved interface conflicts between the two adjoining properties.

The concerns raised in this submission are consistent with and build upon the concerns Boral raised in its earlier submission in respect of the related bulk earthworks application (SSD-97711727). They must be read together, as the two applications are interdependent and their cumulative effects on the Boral Land are greater than either application considered in isolation.

In summary, Boral requests that the Department of Planning, Housing and Infrastructure (DPHI) as the consent authority:

- Require the applicant to demonstrate that the proposed Collector Road network along the northern site boundary is located in a manner consistent with Precinct Plan Requirement SH5, such that roads follow property boundaries wherever practicable and the infrastructure burden is shared equitably between adjoining landowners;
- Impose conditions of consent requiring the applicant to engage with Boral regarding the design of all roads, retaining walls, earthworks, stormwater infrastructure, and site boundary treatments within 15 metres of the shared northern boundary prior to any construction certificate being issued;
- Ensure that the proposed development does not prejudice the ability of Boral to develop its land for industrial purposes, and in particular does not sever access, restrict Boral's future road connections, or constrain the grade and layout of the Boral Land;
- Note Boral's continuing objection to any aspect of the proposal that would result in the future Collector Road being located wholly within the Boral Land.

2 About Boral and the Boral Land

Boral is Australia's largest vertically-integrated construction materials company. Our network includes prized quarry and cement infrastructure, bitumen, construction materials recycling, asphalt and concrete batching



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operations. We employ approximately 7,500 employees and contractors working in research, production and business support across more than 320 locations nationwide.

The Boral Land (Lot 54 DP 3050) is located directly adjacent to the subject site along its northern boundary. The Boral Land is zoned ENT (Enterprise) and ENZ (Environment and Recreation) under the Western Parkland City SEPP and falls within the Badgerys Creek Precinct of the Western Sydney Aerotropolis. Consistent with the Precinct Plan, the Boral Land is anticipated to be developed for enterprise and industrial uses in the medium term, supporting the employment objectives of the Aerotropolis.

Boral is planning to establish a concrete batching plant and associated industrial infrastructure on its land to support construction activity across the broader precinct, and Boral's land will become a key growth pillar for its regional operations network. The realisation of this land use is critical not only to Boral but also to the broader supply of construction materials needed to enable the Aerotropolis to grow.

3 Key Issues

3.1 Collector Road Alignment – Inconsistency with the Precinct Plan

This remains Boral's primary concern with the proposed development, consistent with the position set out in its earlier submission regarding SSD-97711727. The current application crystallises that concern: the internal road layout as submitted does not demonstrate that the required Collector Road along the northern site boundary will be located consistently with Precinct Plan Requirement SH5. Design drawings and supporting reports clearly identify the intention for the collector road to be located on the Boral land and that Goodman do not intend to share the infrastructure burden collectively as intended by the Precinct Plan.

The Precinct Plan requirement

The Western Sydney Aerotropolis Precinct Plan (July 2025, Amendment 3) is a mandatory planning instrument under the Western Parkland City SEPP. Section 4.6 (Movement Framework) establishes the relevant requirements:

- Requirement SH5: "Roads and streets are aligned to follow property boundaries where possible to reduce lot severance."
- Requirement SH3(e): A variation to a Collector Street must demonstrate it "Will not detrimentally impact on access to adjoining properties or result in isolation of properties."
- Requirement SH3(f): A variation must also demonstrate it "Will not impede the orderly development of adjoining properties."
- Requirement SH2(e): Local and Collector streets must "Enable land in different ownerships to be developed independently and ensure that legal and physical access to properties is maintained at all stages in the development process."

The inconsistency in the Internal Works proposal

Section 3.15 of the EIS acknowledges that the proposed layout varies the Road Network and Road Hierarchy, stating that "Collector Streets have been adjusted to increase site layout efficiency." However, no adequate justification is provided for how these adjustments affect the Collector Road alignment along the common boundary with the Boral Land.

The Urban Design Report included in Appendix DDD clearly infers the proposed Collector Road is located entirely within the Boral Land (refer section 4.2 Road and Transport Network), while the civil engineering plans included in Appendix R identify the construction of a retaining wall 5m from the shared boundary with heights extending up to 6m vertical, preventing any future construction of the Collector Road along the shared boundary. This outcome:

- Does not comply with Requirement SH5, because it does not align the road to the property boundary;
- Does not comply with Requirement SH2(e), as it prevents the Boral Land from being developed independently – Boral would be forced to dedicate road reserve, fund road construction, and accept a reduced net developable area;
- Cannot satisfy Requirement SH3(e), as it detrimentally impacts access to the Boral Land; and



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- Cannot satisfy Requirement SH3(f), as a road wholly within the Boral Land would impede orderly development of that land.

The pre-emptive effect of the Internal Works approval

Once internal roads, warehouse lots, retaining walls, and landscaping are approved and constructed up to the northern boundary on the Goodman side, it will be practically impossible and commercially unreasonable for a future Collector Road to be repositioned to straddle the common boundary. Boral therefore requests that DPHI refuse to grant consent for any internal road layout or boundary treatment that pre-commits the future Collector Road to a location wholly within the Boral Land, and imposes conditions requiring:

- The Collector Road along the northern boundary to be designed with at least 50% of the required road reserve width accommodated within the subject site, consistent with Requirement SH5;
- The applicant to provide evidence of genuine consultation with Boral regarding the Collector Road alignment prior to commencement of any construction within 15 metres of the shared boundary; and
- No retaining walls, footings, drainage infrastructure, or landscaped batters to be constructed proximate to the shared boundary without the prior written consent of Boral.

As an alternative to the above, Boral requests that DPHI confirm that the Collector Road identified at this location in the Western Sydney Aerotropolis Precinct Plan is no longer warranted as a result of the Goodman proposal and will not be required on the Boral land.

3.2 Reasonable and expected Development

Request for the EIS to acknowledge the anticipated industrial use of the Boral Land and to confirm that the proposed development has been designed to accommodate that use without generating incompatible amenity expectations.

3.3 Contamination Management – Risk of Migration to Boral Land

The EIS (Section 6.18) confirms that the subject site contains contaminated media and relies on the Bulk Earthworks SSDA to address contamination remediation. Consistent with concerns raised in our submission in respect of the related bulk earthworks application (SSD-97711727), Boral remains concerned with the potential migration of contamination (particularly with respect to asbestos fibres) to the Boral Land during the proposed works.

Boral requests that conditions of consent require confirmation, prior to any works near the northern boundary, that all contamination remediation under the Bulk Earthworks SSDA has been completed to the satisfaction of a suitably qualified environmental auditor, and that asbestos fibre monitoring at the northern boundary confirms no impacts to the Boral land as a result of the remediation and containment cell construction works.

4 Conclusion

Boral acknowledges the important role of the proposed Project Maverick warehouse estate in delivering employment-generating industrial land within the Western Sydney Aerotropolis. However, Boral maintains firm concerns regarding the aspects of the proposal set out in this submission, which individually and cumulatively have the potential to prejudice the development of the Boral Land, impose inequitable infrastructure obligations on Boral, and create unresolved interface conflicts. We note that we have been consulted by Goodman, however, these concerns are not adequately addressed in the EIS.

Boral requests that DPHI:

- Carefully consider the Precinct Plan requirements for Collector Road alignment and refuse to approve any internal road layout that pre-commits the Collector Road to a location wholly within the Boral Land;
- Impose appropriate conditions of consent to address the issues raised in Sections 3.1 through 3.3 of this submission;
- Require the preparation of a Northern Boundary Interface Plan prior to the issue of any construction certificate for works in proximity to the northern boundary; and
- Engage Boral in pre-determination discussions regarding the boundary interface design.



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Boral is committed to working constructively with the applicant, DPHI, Liverpool City Council, and other relevant agencies to ensure the Badgerys Creek Precinct develops in an orderly and equitable manner. Boral welcomes the opportunity to discuss the matters raised in this submission further. Should you have any queries, please contact the undersigned.

Declaration – Reportable Political Donations

In accordance with the requirements of the NSW Planning Portal submission process, Boral Resources (NSW) Pty Ltd declares that it has made no reportable political donations in the two years prior to the date of this submission.

Boral accepts the Department's disclaimer and declaration as required under the NSW Planning Portal submission requirements.

Yours sincerely,

Rod Wallace
Planning & Development Lead NSW/ACT