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Chris Ritchie NSW Department of Planning and Infrastructure Ground Floor, 23-33 Bridge St SYDNEY NSW 2000

Dear Mr Ritchie,

9 January 2013

St Peters Modification 8

Further to comments received by the Department of Planning and Infrastructure (DP&I) from Marrickville Council (Council) and the Roads and Maritime Services (RMS), please find below responses to each of the matters raised.

Preliminary Soil Assessment

Council have identified that the site is potentially affected by acid sulphate soils (ASS), and is classified as Class 2 under the Marrickville LEP 2011.

While Boral acknowledge the ASS classification, past activities on the site, in particular around the site's rail corridor, have not found the presence of ASS. The existing rail line on the site was duplicated relatively recently (around 1998), with no reported instances of ASS during the construction. Furthermore, it is likely that the long industrial history of the site has resulted in a considerable amount of fill being distributed across the lot.

Boral's rail contractors who will be responsible for undertaking the proposed rail works have advised that in order to level the area for laying ballast and rail, excavation may be required. In the event of excavation being required it is anticipated that the excavated levels could be between 300mm and 650mm below ground level.

Should the Department consider that a preliminary soil assessment is required, Boral would propose to drill and test at three locations for the presence of ASS along the proposed works area. Results from these tests would be provided to the Department and Council as required.

Heritage significance of Alexandra Canal

Council have highlighted that as the site adjoins the Alexandra Canal, a heritage assessment/comment should be provided. Alexandra Canal is a listed heritage item (I270) within Council's LEP 2011.

The site lies in an existing industrial area, known as the central industrial area, located between the airport and the CBD. The site is rectangular in shape, with frontage onto Alexandra Canal and a total area of 4.35 hectares. The site is significantly disturbed due to years of industrial activities by both Boral and previous uses on the site, in keeping with the industrial nature of the area.

The proposed construction of an additional rail siding and cross over will not impact on the heritage significance of the Alexandra Canal as follows:

- does not change the character of or impact visually on the canal, and instead augments an existing use on the site;
- it is in keeping with the industrial amenity of area and the existing activities carried out on this site and other sites in the area;
- will be located within a dedicated rail corridor, where 2 rail lines already exist; and
- is buffered from the Canal by a site access road to the concrete batching plant rail unloading points and a 10 metre setback which is landscaped with native vegetation.

Figure 1 below, is an aerial of the site looking south towards the Canal, showing the existing site rail corridor and vegetation buffer. Note that the Canal is not clearly visible from the site, due to the density of the vegetation buffer.



Figure 1: View from site, looking south towards the Canal

Figure 2 shows the northerly viewpoint demonstrating that the 10 metre vegetation setback provides an effective buffer between the Canal and the site, with the site not clearly visible from the Canal due to the vegetation density.



Figure 2: View from Canal, looking north towards the site

Boral made reference to the significance of Alexandra Canal in the 1996 Environmental Impact Statement undertaken by SA Smits and Associates. Section 4.1.5 of the EIS stated that:

In view of the 10 metre building setback incorporating a 5.79 metre easement along the canal, the proposed landscape treatment in this area will include reinforcing the existing native screen planting within the setback, while allowing for the possible future construction of a pedestrian/cycleway by MMC.

This complies with Clause 37 of Council's *Code for Industrial Development*, which states that the fixed foreshore building line for all land fronting Alexandra Canal shall be 10m from the property boundary of this land and the canal.

Flood assessment

Section 4.3.5.3 of the 1996 EIS addressed the flooding potential of the site, based on the Wolli Creek, Bardwell Creek and Bonnie Doon Channel Flood Study Draft Report (October 1995) by Webb McKeown & Associates. It concluded that the probable maximum flood (PMF) for the site

was considered low and therefore a site specific study of probable maximum rainfall was not considered warranted. The PMF levels for the Alexandra Canal are 5.11m AHD and 5.1m AHD at the eastern and southern corners of the site respectively.

Furthermore, as stated by Council in their response, the proposed rail siding is an augmentation of existing activities occurring on site and therefore flood analysis was not considered warranted for this modification.

Swept path analysis

The RMS have requested a swept path plan of the longest vehicle accessing the site for construction purposes. The longest vehicle that is anticipated to access the site for construction is a b-double (27.5 metres). B-doubles currently access the site for the collection of quarry products and product delivery to the concrete batching plant via the southern most entry/exit point. Figure 3 below shows the entry and exit point to the site for long vehicles such as b-doubles. Long construction vehicles accessing the site will also use this southern entry /exit point.



Figure 3: Entry and exit points for the site

As demonstrated in figure 3 above, long vehicles do not currently need to turn to gain access to or exit the site, and instead can simply drive in a straight line onto and off Burrows Road South. We therefore propose that a swept path plan is not necessary for this modification.

Car parking provision

Condition 12 of the site's existing consent states:

Provide and maintain off street car and truck parking spaces to cater for peak parking demands in accordance with Marrickville Council's standards prior to commencement of the use of the site

The site currently has capacity for 80 vehicles, which more than caters for current parking needs and will be sufficient for the additional five person construction workforce.

Vehicle movements on site

Condition 15 of the site's existing consent states: All vehicles entering and leaving the development shall do so in a forward direction.

A one way system currently operates around the site in accordance with the above condition.

Construction traffic management plan

Owing to the small nature of the proposed development, a construction traffic management plan was not considered necessary. As stated in the modification letter, construction traffic would comprise the following:

- a five person construction workforce that generates 5 additional movements into and out of the site each day for the duration of the one week construction period; and
- approximately 5-6 truck movements into and out of the site for the entire construction period, delivering machinery, equipment and materials required for the construction of the rail siding.

The trucks accessing the site for the construction of the rail siding will not be any larger than the existing trucks accessing the site for quarry product collection (truck and dog and b-doubles). Construction hours of operation were included in the modification letter, which will be restricted to between 6am to 10pm.

Considering the small number of vehicles accessing the site for construction purposes, a construction management plan is not considered necessary.

I trust this adequately addresses the comments raised by both council and the RMS for a proposed development of this small size and nature. Should you have any further questions, please do not hesitate to contact me on 9033 5546.

Yours faithfully

Kate Jackson Project Manager