



19 December 2019

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
320 Pitts Street
SYDNEY NSW 2000

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

Triniti – T2, 39 Delhi Road
North Ryde NSW 2113
PO Box 6041, North Ryde 2113
T: +61 (02) 9033 5140
F: +61 (02) 9033 5142

www.boral.com.au

Dear Mr Betts,

**SUBMISSION - SSI 9737
SYDNEY GATEWAY ROAD PROJECT**

Please find attached the preliminary submission prepared on behalf of Boral Resources (NSW) (Boral). By way of background, Boral has been working with the RMS for the last 6 months seeking to have the impacts on Boral's operations kept to a minimum and documented through appropriate legal agreements. Unfortunately this has not been resolved and therefore Boral requires that the Department of Planning, Industry and Environment (DPIE) impose conditions on the Sydney Gateway approval to ensure that impacts including the following are addressed:

- Traffic
- Rail siding and access
- Safety and emergency response
- Damage to existing structures
- Setbacks and clearances from Boral's operations
- Water management
- Disturbance of ground contaminants

The above impacts are described in more detail in the attached preliminary submission. Boral's consultant team is currently completing a review of the EIS documentation and we will be in a position by 14 January to set out in more detail the specific conditions of consent that are required to minimise impacts on Boral's operations. As discussed with Belinda Scott we understand that a submission by this date will be accepted by the Department.

We thank you for the opportunity to make this preliminary submission.

If you have any questions in relation to this letter or the amended plan set attached please do not hesitate to contact me on (02) 9033 5546.

Yours faithfully

Kate Jackson
Regional Manager NSW/ACT
Boral Land & Property Group

18 December 2019

Kate Jackson
Regional Manager NSW/ACT
Boral Land & Property Group
PO Box 6041
North Ryde NSW 2113

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au
www.emmconsulting.com.au

Re: Sydney Gateway EIS Submission

Dear Kate,

1 Introduction and background

The Sydney Gateway road project (Sydney Gateway) connects Port Botany and Sydney Kingsford Smith Airport with the new St Peters Interchange and WestConnex motorway network. It includes new and upgraded sections of road linking the airport terminals and new crossings over the Alexandra Canal to increase capacity and improve traffic flow.

Roads and Maritime Services (RMS) and Sydney Airport Corporation prepared the Sydney Gateway road project Environmental Impact Statement (EIS)/preliminary draft Major Development Plan to support project development, which was submitted for public exhibition on 20 November 2019.

Boral Resources (NSW) Pty Ltd (Boral) owns and operates a concrete batching plant and construction materials handling facility at 25 Burrows Road, St. Peters (the Site), which is adjacent to Gateway. The Site operates under a State significant development consent, issued in 2005 and is an important operation in the Boral Australia network. It is also an important site for Sydney's construction sector. The concrete plant is Boral's largest plant in Australia, and the quarry's terminal allows the delivery of construction materials into Sydney via rail from four different Boral operations; Berrima Cement, Peppertree Quarry, Dunmore Quarry, and Dunmore Sand and Soils. It is centrally located on the eastern seaboard of Sydney with convenient access to the Sydney CBD and surrounds. No other construction materials business has the capability to supply aggregates and cement into the Sydney region via rail from four different operations. Accordingly, the St Peters site is a critical component to Sydney's construction and infrastructure sectors.

The Sydney Gateway project, as described in the EIS, represents a significant impact on Boral's operations. Gateway structures proposed to be constructed on Boral's freehold land will be within 1.5 metres of our existing raw material silos. Piers proposed to be constructed require alterations to Boral's traffic management practices, as well as the removal of several Boral structures.

Boral and EMM have reviewed the Sydney Gateway EIS to assess the impacts of Sydney Gateway on Boral's operations. Given the importance of Boral's operations to the construction materials and building industry in Sydney, it is requested that the Department of Planning, Industry and Environment requires the matters in Table 2.1 to be addressed.

2 Sydney Gateway EIS technical review

Table 2.1 outlines items to be addressed by the proponent for contamination, air quality, surface water, traffic and transport, and other general issues.

Table 2.1 **Key items to be addressed by the proponent**

Technical area	Ref no.	Issue of concern	Proposed recommendations
Traffic impacts during the construction stage	1.1	The traffic impact assessment for the project has not adequately assessed the likely traffic impacts during the construction stage, in particular for the Princes Highway and Canal Road access routes.	Additional traffic investigations are required to be undertaken by the proponent prior to any development approval being issued for the project, to accurately identify the existing peak hour intersection traffic operations and any adverse construction stage traffic impacts on both the Princes Highway and Canal Road routes.
	1.2	Further investigation is required using a linked intersection model such as SIDRA to identify the existing peak hour intersection traffic operations at the Princes Highway/Canal Road and Canal Road/Burrows Road/Ricketty Street intersections and the effect of the proposed Gateway Construction traffic for site compound access points A1, A2, A3, A7 and A8 when it attempts to travel through these intersections.	Detailed maps of additional peak hour intersection traffic movements, for both light and heavy vehicles, shall be required to be prepared by the proponent to clearly show the proposed additional peak hourly construction traffic movements from all the relevant construction compound access points (A1, A2, A3, A7 and A8) which may potentially adversely affect the future traffic operations at these intersections.
	1.3		A preliminary future SIDRA linked intersection analysis has been completed by EMM based on an assumed future distribution of the Gateway construction traffic specified in the EIS. AM and PM peak hour additional traffic plots are illustrated in Attachment A. These results show a further significant worsening of both the AM and PM peak hour traffic delays at most intersections, in particular at the most heavily congested Princes Highway and Canal Road intersection, where the forecast average intersection delays will increase to (Level of Service F) 146.9 seconds and 152.0 seconds in the AM and PM traffic peak hours respectively.
	1.4	The Princes Highway/Canal Road and Canal Road/Burrows Road/Ricketty Street intersections (and several other intersections in the Sydenham, St Peters and Mascot localities along the Princes Highway and Canal Road/Ricketty Street routes) already have heavily congested traffic conditions during the peak traffic hours on weekdays. The traffic congestion delays at key intersection are likely to worsen significantly with the Gateway Construction traffic such that the increased traffic congestion will adversely impact on traffic operations for the existing Boral operations and other businesses within the St Peters area.	The Princes Highway/Canal Road intersection is known to be the most heavily congested intersection currently on either the Princes Highway or Canal Road routes and detailed reporting of the future Gateway Project construction traffic impacts must be provided by the proponent for Boral and other operating businesses within the St Peters area to fully understand the likely traffic impacts for their businesses.

Table 2.1 **Key items to be addressed by the proponent**

Technical area	Ref no.	Issue of concern	Proposed recommendations
	1.5	The project proponents must be required to provide assurances to Boral and other businesses operating within the St Peters area that all identified intersection and route delay traffic impacts will be adequately mitigated by identified intersection capacity improvements during construction and the subsequent operation stages of the Gateway project.	Before the project is approved, the likely traffic impacts of the proposed Gateway Construction traffic from all the relevant construction compound access points (A1, A2, A3, A7 and A8) on the future traffic operations of key intersections along the Princes Highway and Canal Road routes must be identified and appropriate traffic impact mitigation measures identified (such as re-phasing of the traffic signals at Burrows Road South and Canal Road, no queuing or parking of vehicles in Burrows Road).
	1.6	Boral seeks the opportunity to review and provide input to the construction traffic management plans which will be prepared for the Gateway project construction (in particular for all construction sites which are proposing vehicle access via the Canal Road or Princes Highway routes) to ensure that the forecast construction stage traffic impacts are adequately mitigated and do not adversely impact on traffic operations for the existing Boral operations and other businesses within the St Peters area.	The significant traffic impact mitigation measures which will be required to ensure acceptable project construction stage traffic operations at key intersections such as at Princes Highway/Canal Road, shall be specified in draft construction stage traffic management plans, which shall be made available for review by Boral and other existing businesses operating in the St Peters, Mascot and Sydenham areas.
	1.7		The traffic management plans should specify that all project construction traffic is to be prohibited from using the intersection of Burrows Road and Canal Road between the hours of 7-9am and 4-6pm. This requirement is in line with RMS restrictions placed on the Boral St Peters site (refer Attachment B).
	1.8		The traffic management plans should specify that all project construction traffic is prohibited from traversing or using Boral's property between the above hours.
Contamination	2.1	There is limited information on the nature of proposed investigation (and potential remediation) in the railway corridor during the detailed design and construction phase, and the potential for operational impacts to that infrastructure. The proponent is to clarify if any of the proposed works are likely to affect the operations of the railway siding within the Boral site, and if so, the timing and methodology proposed for further investigation to identify potential impacts and mitigation measures to be implemented.	Boral seeks input to the planning and management of proposed investigations (and potential remediation) in the railway corridor.

Table 2.1 **Key items to be addressed by the proponent**

Technical area	Ref no.	Issue of concern	Proposed recommendations
	2.2	Further investigation to characterise contamination within AA3 may identify contamination that is likely to also affect the Boral site (for example, the potential presence of free tar). Investigation and remediation work on AA3 is not in themselves considered likely to impact on the operational capabilities of the Boral site, subject to appropriate management. However, it may trigger a requirement for Boral to undertake investigations and/or remediation within the Boral site, with the potential to impact on operations and/or production.	Boral seeks input to the planning and management of proposed investigations (and potential remediation) within AA3.
	2.3		The proponent is to carry out a baseline contamination assessment and provide to Boral (and all underlying data) for consideration prior to approval of construction management plans or commencement of construction.
	2.4	Dewatering has the potential to result in discharge of contaminated groundwater and/or mobilisation of contaminants in groundwater. However, appropriate management to ensure the treatment and lawful disposal of extracted groundwater will limit potential impacts on the Boral site (i.e. no potentially impacted groundwater should be discharged onto or in the vicinity of the Boral site). Mobilisation of contaminants in groundwater may result in contaminated groundwater migrating onto and through the Boral site.	Appropriate contamination and dewatering management measures are to be specified in construction management plans to prevent mobilisation and potential migration of contaminants and ensure appropriate disposal of extracted groundwater.
	2.5	Dewatering may also cause impacts to infrastructure on the Boral site, for example, destabilisation or changes in sub-surface conditions (salinity, acidity, etc). A dilapidation survey should be undertaken to confirm the current conditions of the site infrastructure and provide assurance to Boral in the event that conditions change during construction and operation of the Gateway project.	A dilapidation survey of structures, road and rail infrastructure within Boral's site is to be prepared (at the proponent's cost) and provided to Boral.
	2.6	Assurances that the management plans to be prepared for works on AA3 include adequate measures proposed for the safety of workers on the Boral site.	Boral seeks the opportunity to review and provide input to the management plans prepared for works on AA3, to ensure it is satisfied that the measures proposed are adequately protective of workers on the Boral site.
	2.7		The proponent (and contractors) must remediate immediately any disturbance to any pre-existing contamination.
	2.8		The proponent (and contractors) must remediate immediately any contamination it causes during the project.
	3.1	The construction phase of Sydney Gateway is the most critical component of the project for both impacts directly to the Boral site and for cumulative impacts at neighbouring receptors.	Boral requests a construction environmental management plan (CEMP) be prepared and include management practices and monitoring locations that are clearly identified, with a construction monitoring location to be established in the vicinity of the Boral site.

Table 2.1 Key items to be addressed by the proponent

Technical area	Ref no.	Issue of concern	Proposed recommendations
Surface water and flooding	3.2	Odour from the Gateway excavation construction activities may result in potential amenity impacts to employees at the Boral site. A range of mitigation options are presented for the excavation of Tempe Landfill.	Boral requests a detailed section relating to odour management practices be contained within the CEMP.
	4.1	Gateway proposes to build a new drainage line to replace the existing drainage line that conveys runoff from a catchment to the north of the Boral site to the Alexandra Canal. The existing drainage line includes a culvert that passes under the south-western portion of the Boral site. The western portion of the Boral site drains to the inlet of this culvert. Gateway proposes to decommission / abandon this stormwater line.	Boral seeks assurances that overflows from the western portion of the Boral site can be connected to the proposed drainage system.
	4.2	<p>The Boral concrete plant is a major water user. There could be mutually beneficial opportunities for Gateway to provide water to Boral:</p> <ul style="list-style-type: none"> • during construction – to reduce controlled discharges from the Gateway project; and • during operations – via a stormwater harvesting scheme. <p>It is noted that Gateway is not proposing to meet the pollution reduction targets described in the Botany Bay and Catchment Water Quality Improvement Plan. Stormwater harvesting would improve the pollution reduction achieved by the Gateway stormwater management system. It may be possible for Gateway to construct a stormwater storage to the north of the Boral site to facilitate stormwater harvesting.</p>	
	4.3	A stormwater harvesting arrangement would have environmental benefits through reduced mains water use at the Boral site and lower discharge volumes from the Gateway project. This could reduce water treatment and compliance costs of the project.	Boral requests that the proponent investigate potential stormwater harvesting options in consultation with Boral and relevant agencies.
Emergency response and pollution incident response	5.1	The proponent (and its contractors) are to comply with the provisions of Boral's Emergency Response Plan, Pollution Incident Response Management Plan and Access Management Plan.	
Damage	6.1	Any damage caused by the proponent or its contractors to Boral's property is to be rectified at the proponent's cost and to Boral's satisfaction.	
	6.2	Demolition and re-establishment of any Boral structures/improvements to facilitate the construction of the project is to be at the proponent's cost to Boral's satisfaction.	

Table 2.1 Key items to be addressed by the proponent

Technical area	Ref no.	Issue of concern	Proposed recommendations
Services	7.1	The proponent must commit to there being no disruption to the provision of services (including data and telephony) to Boral's operations.	
Rail	8.1	The proponent must commit to there being no disruptions of any kind, except as agreed in writing with Boral, to Boral's rail operations other than the four rail track possessions required by the Australian Rail Track Corporation for maintenance annually, which do not exceed 48 hours in length, and are conducted on weekends only.	
	8.2	The proponent must commit to there being no impact to rail signals or impediment to sight lines at any stage.	
	8.3	The proponent must commit to the rail corridor being kept free of hazards/obstacles at all times.	
	8.4	The proponent must commit to not undertaking any works within 3.1 metres on the northern side or 3.5 metres on the southern side of the rail line centre.	
	8.5	In consideration of pedestrian safety, the proponent must commit to installation of a pedestrian access located approximately 10 metres from the end of the road deck pier on Boral's site that is nearest the rail line centre.	
	8.6	An assessment of the rail condition and alignment is required prior to and after any works or heavy vehicle crossings are undertaken in the rail corridor.	Boral requests an assessment of rail condition and alignment be undertaken by the proponent at their cost, with the findings of this assessment to be documented and a copy of that documentation provided to Boral prior to commencement of any works. Any impacts to or disturbance of the rail track on and adjoining Boral's land are to be rectified immediately at the proponent's cost.
General	9.1	All proposed Sydney Gateway infrastructure/assets are to be constructed at least 1.5 metres clear from Boral's current and approved structures.	
	9.2	Lighting is to be installed and maintained by the proponent (or its contractors) at its cost and to Boral's satisfaction under the elevated road bridge to ensure there is no impairment to the visibility for Boral's operations under the road bridge.	
	9.3	Anti bird measures are to be installed and maintained by TfNSW at its cost and to Boral's satisfaction to prevent birds nesting and landing on the road structure.	

Table 2.1 **Key items to be addressed by the proponent**

Technical area	Ref no.	Issue of concern	Proposed recommendations
Visual/safety	10.1	Limited details could be found in relation to the design of road barriers or screens along the road corridor in the vicinity of the Boral site. Figure 108 of the Technical Working Paper 13 – Urban Design, Landscape Character and Visual Impact Assessment illustrates the central interchange precinct when viewed in the direction of the Boral site. It can be seen from this figure that transparent noise barriers line the roadway that passes the Boral site, which would not provide a visual barrier to Boral operations.	Clarification is sought on the design of the road barriers along the road corridor in the vicinity of the Boral site. Boral requests these barriers be solid and three metres high along the perimeter of the road bridge for safety and visual reasons and be constructed by TfNSW at its cost and to Boral's satisfaction.

3 Closing

Given the importance of Boral's St Peters site, and the proximity and quantum of impacts from the Gateway Project, Boral requests a meeting with the relevant members of DPIE's assessment team on site to set out our concerns.

Yours sincerely



Claire Burnes

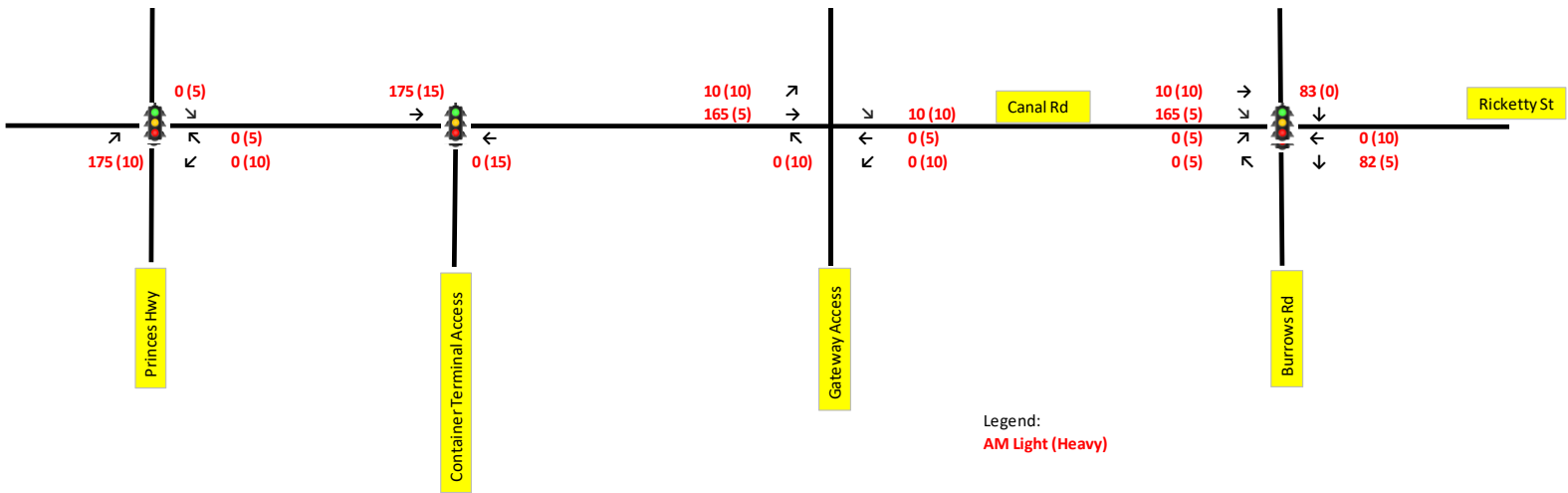
Associate

cburnes@emmconsulting.com.au

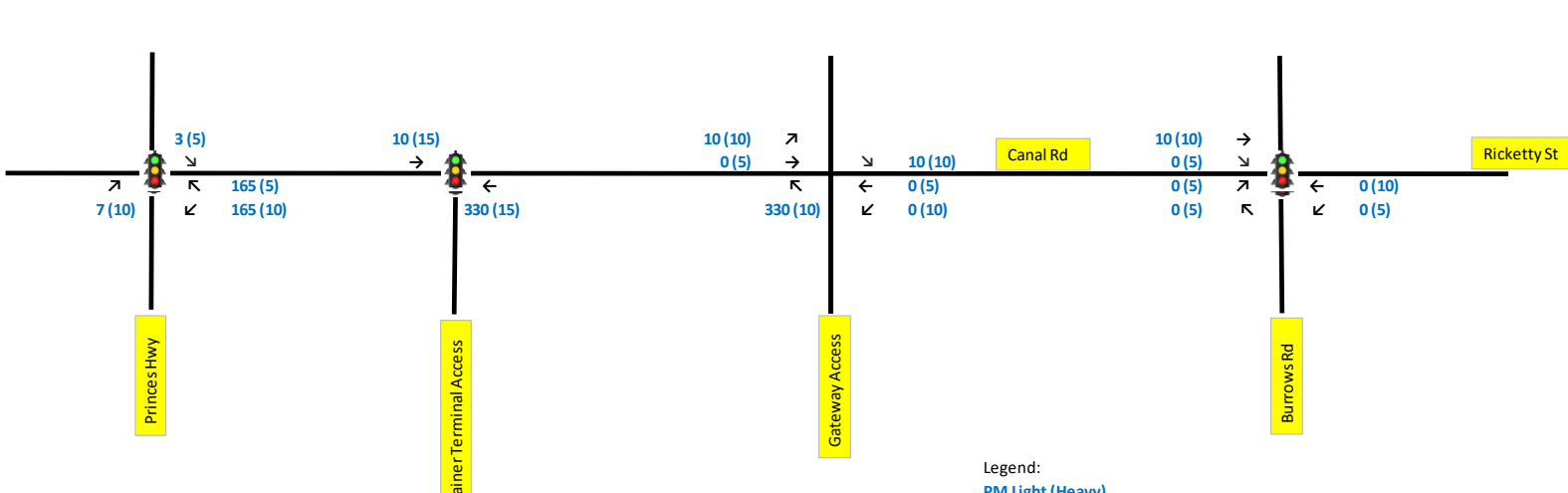
J190839 SIDRA Results for 2017 Baseline Traffic, 2019 with Boral MOD 11/12 Approval and with Gateway Construction Traffic (after Jan 2020)

Intersection Traffic Scenario	AM Peak Year 2017 Baseline Traffic Conditions	AM Peak with Boral MOD 11/12 Approved CBP and Quarries Terminal Traffic	AM Peak also including Proposed Gateway Construction Traffic at Canal Road Worksites A1,A2,A3	PM Peak Year 2017 Baseline Traffic Conditions	PM Peak with Boral MOD 11/12 Approved CBP and Quarries Terminal Traffic	PM Peak also including Proposed Gateway Construction Traffic at Canal Road Worksites A1,A2,A3
	Vehicles/hour D/SAT DEL LOS	Vehicles/hour D/SAT DEL LOS	Vehicles/hour D/SAT DEL LOS	Vehicles/hour D/SAT DEL LOS	Vehicles/hour D/SAT DEL LOS	Vehicles/hour D/SAT DEL LOS
Canal Road Burrows Road Ricketty Street	(3352) 0.851 19.3 B	(3402) 0.905 29.7 C	(3757) 1.652 57.0 E	(3452) 1.265 42.9 D	(3502) 1.756 65.6 E	(3525) 1.479 59.7 E
Canal Road Container Terminal Access	(3065) 0.579 4.3 A	(3084) 0.530 3.8 A	(3281) 0.530 3.7 A	(3161) 0.637 5.4 A	(3180) 0.631 4.8 A	(3551) 0.757 6.5 A
Canal Road Princes Highway Mary Street	(5013) 1.061 69.7 E	(5032) 1.187 100.6 F	(5228) 1.308 146.9 F	(5735) 0.964 48.1 D	(5753) 1.147 64.7 E	(6124) 1.752 152.0 F

AM Peak



PM Peak



8 December 2018

Our Reference: SYD12/01463/09
DP&E Ref: DA14/96 MOD11

Team Leader
Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Sally Munk

Dear Sir/Madam,

**BORAL CONCRETE BATCHING PLANT
25 BURROWS ROAD SOUTH, ST PETERS**

Reference is made to the Department of Planning and Environment (DP&E) email dated 8 November 2018, regarding the abovementioned application which was referred to Roads and Maritime Services (Roads and Maritime) for comment in accordance with the *State Environmental Planning Policy (Infrastructure) 2007*.

Roads and Maritime has reviewed the submitted SIDRA modelling files and notes the information provided has the correct data input. As such, Roads and Maritime raises no objection to the modification subject to the following conditions being included in any consent issued by the Department:

1. The proponent shall submit a Heavy Vehicle Management Plan to be reviewed and approved by Council.
2. Increased truck movements shall occur outside AM and PM peak periods (0700 to 1000 and 1600 to 1900 Monday to Friday) until the completion of Westconnex Stage 3, which will mitigate the impact to the State road network.
3. All vehicles are to enter and leave the site in a forward direction.
4. All vehicles are to be wholly contained on site before being required to stop.

Should you have any further inquiries in relation to this matter, please do not hesitate to contact Brendan Pegg, Senior Land Use Planner by email at development.sydney@rms.nsw.gov.au.

Yours sincerely



Aleks Tancevski
Senior Manager Land Use Assessment
South East Precinct, Sydney Division

Roads and Maritime Services