



MAJOR PROJECT ASSESSMENT:
MP10_0186, Proposed Concept Plan Airs
Bradbury Renewal Project



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

July 2012

ABBREVIATIONS

CIV	Capital Investment Value
Council	Campbelltown City Council
Department	Department of Planning & Infrastructure
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning & Infrastructure
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning and Infrastructure
OEH	Office of Environment and Heritage
PAC	Planning Assessment Commission
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
PEA	Preliminary Environmental Assessment
PFM	Planning Focus Meeting
PPR	Preferred Project Report
Proponent	NSW Land and Housing Corporation
RtS	Response to Submissions

Cover Photograph: building typologies of future dwellings and retain cottages in Airds

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NSW Government

Department of Planning & Infrastructure

EXECUTIVE SUMMARY

This is a report for a concept plan application for the Airds-Bradbury Renewal Project in the south west region of Sydney (see figure 1) pursuant to the Part 3A transitional arrangements of the Environmental Planning and Assessment Act, 1979.

The NSW Land and Housing Corporation (Housing NSW) is seeking approval to carry out an urban rejuvenation project over the 200 hectare site and increasing the number of dwellings from 1542 to 2104. The development will ultimately consist of 70% private housing and 30% public housing and will include new or upgraded urban infrastructure such as pathways, lighting, open space, community facilities, drainage and a series of new interconnecting public roads.

The proponent is seeking concept approval that will provide for 2104 dwellings in 12 stages over 15 years. Each stage will be subject to future individual development applications for subdivision and the proponent has advised that they seek to enter into a future Voluntary Planning Agreement (VPA) with Campbelltown City Council for the delivery of new or embellished urban infrastructure including community facilities and open space areas. The estimated project cost of the total development is \$187 million.

The Council was delegated the functions of the Director-General in the assessment of this application.

The proposal was placed on public exhibition for a period of 61 days from 15 June 2011 until 15 August 2011. The Council received a total of 8 submissions from public authorities, and 29 submissions from the public, 22 of which were objections. Key issues raised by both public authorities and members of the public, include:

- Impacts on native vegetation and ecological communities
- Displacement of existing residents as part of the renewal project
- Location of new roads and the adverse impact upon the amenity and safety of residents
- Provision of suitable community facilities and public open space areas
- Impact on Aboriginal heritage
- Impact of development on Reiby Juvenile Justice Centre and appropriate mitigation measures

On 20 October 2011 the proponent amended details of the concept plan and provided further supplementary supporting documentation via the Preferred Project Report, to address issues raised in the agency and public submissions and by the Council. The amendments included clarification on a number of local street locations and shared ways, reorientation of proposed lots fronting Georges River Road to instead face the internalised road system, further information supporting biodiversity and a revised Statement of Commitments. A final response to submissions and Preferred Project Report was submitted in May 2012.

The impacts of the proposed development have been addressed via the proponent's Environmental Assessment, Preferred Project Report, the Statement of Commitments and the recommended modifications and conditions of approval. The concept plan application, with recommended modifications, is supported because it will facilitate the orderly redevelopment of the Airds-Bradbury public housing estates and is therefore consistent with the objectives of the draft Southwest Subregional Strategy to promote increased housing provision and choice.

On these grounds the site is suitable for the proposed development and that the proposal will have positive environmental, social and economic benefits to the region. All statutory requirements have been met. Approval is recommended subject to the recommended modifications to the concept plan, including a revised design of the Baden Powell Reserve.

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BACKGROUND

1.1 The proposal

The NSW Land and Housing Corporation proposes to undertake an urban renewal project within the Airds-Bradbury Housing estates, creating a new urban form with new lots and redevelopment of existing dwellings. The proposed development involves the long term urban rejuvenation of the Airds-Bradbury public housing estate. The development will increase the number of dwellings within the project area from 1542 to 2104, including the retention of 880 single dwellings currently owned by NSW Land and Housing Corporation. Of these 880 retained dwellings, ownership of 262 will be retained by NSW Land and Housing Corporation and 527 dwellings will be sold to private occupiers. The development will ultimately consist of 70% private housing and 30% public housing. The project will include new or upgraded urban infrastructure such as pathways, lighting, open space, community facilities, drainage and a series of new interconnecting public roads.

Also included in the project is the delivery of new and improved community facilities and open space areas. The existing town centre is proposed to be updated and expanded.

The overall project vision is to make the Airds Bradbury Renewal Area: *a great place to live, a place with good amenity, services and facilities in a socially mixed community offering opportunities for residents to realise their goals*

The renewal strategy for Airds-Bradbury is based on the same principles that have been utilised for other urban renewal projects, such as Minto and Bonnyrigg. The project is being undertaken using the Government's *Living Communities Model*, which is a model of estate renewal that pursues three distinct aims:

- Improve the housing and public spaces;
- Improve services and provide residents with better opportunities; and
- Support the local community to build its strengths, skills and overall capacity.

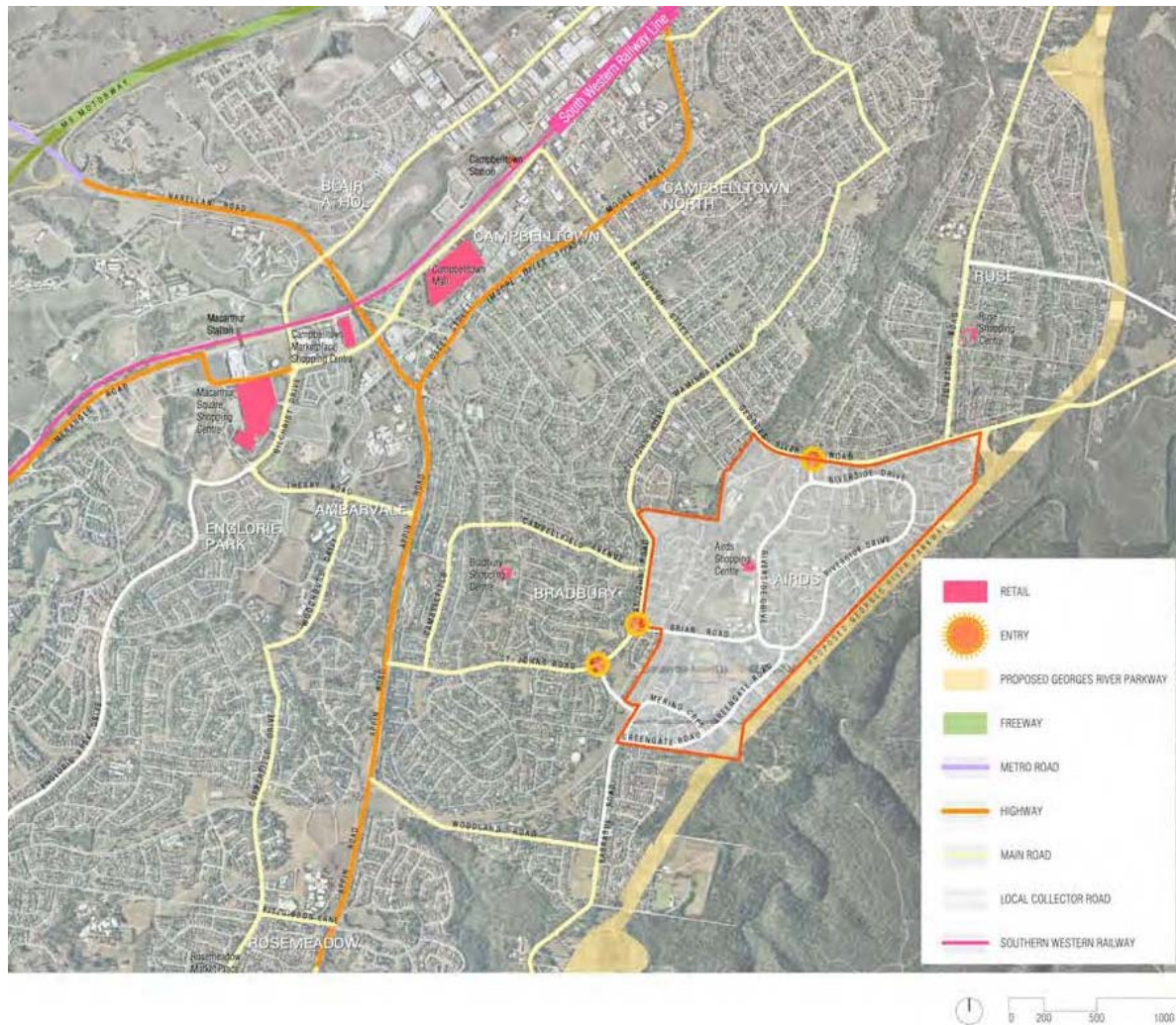
The estate was developed on 'Radburn' planning principles, primarily between 1979-1981. The Radburn style has proven to be an unsustainable form of housing, given the back to front design of the housing, poorly connected and isolated walkways and open space areas and the prevalence of super lots throughout the estate.

1.2 Site location and strategic context

The site is located 50km to the south west of Sydney and 2.5 kilometres south east from the city centre of Campbelltown, which is the regional city for the Macarthur district. Airds Bradbury is an established suburban centre having been originally developed as a public housing estate in the late 1970s. It benefits from the provision of existing infrastructure with access to arterial and sub arterial roads and shopping centres such as Macarthur Square and other retail destinations within the Campbelltown city centre.

Campbelltown Hospital, Campbelltown Private and Macarthur Private Hospital are all located less than 2.5km from the site area. Further to the west is the University of Western Sydney and the South Western Sydney Institute of TAFE.

The project location is shown in Figure 1 below.

Figure 1: Project Location

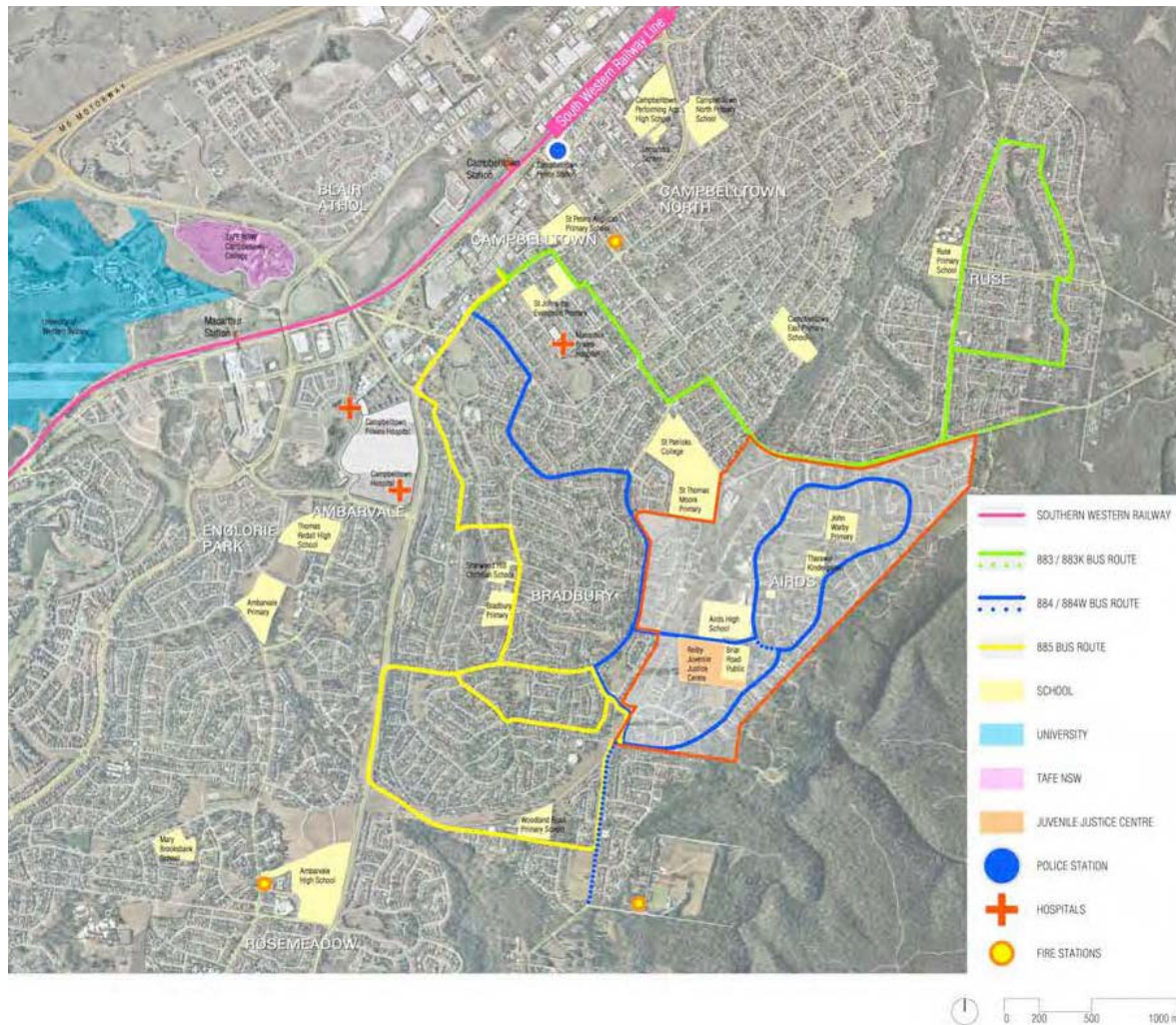
The Airds-Bradbury Renewal Area as shown above covers an area of approximately 200 hectares. Within this area there are 1451 public housing dwellings and 91 properties in private ownership. No development is proposed on private sites and they do not form part of the land to which the concept plan application relates. The concept plan area is referred to as “the site”.

1.3 Surrounding land uses

The site is located within an established urban area being adjoined to the north by Georges River Road (a sub-arterial road) with the suburb of Ruse being located immediately adjacent (to the north) of this road. To the west is the remaining portion of the suburb of Bradbury which extends towards Campbelltown. Dividing Airds from Bradbury is ‘Smiths Creek Corridor’. South of the site is further residential development encompassing St Helens Park and to the east of the site is the reservation for the proposed Georges River Parkway and associated bushland areas leading down to the Georges River.

The predominant built form and land use surrounding the site is low density residential development. The residential allotments vary in size with most existing allotments being between 500-600 square metres.

The adjoining suburbs and land uses are illustrated in Figure 2 below. The map also shows the relationship of the site to retail and service destinations such as Macarthur Square and Campbelltown Hospital.

Figure 2: Relationship of site to adjoining land uses

1.4 Current and former land uses

The site is bounded by Georges River Road to the north, St John's Road and Smiths Creek to the west, Greengate Road to the south and the Georges River Parkway Reserve to the east. The three main elements of the estate include:

- The Smiths Creek bypass corridor land (the abandoned transport corridor separating Airds and Bradbury that is no longer required for transport related purposes),
- The existing Airds and Bradbury public housing estates, and
- Non-residential uses such as the Airds shopping centre, Reiby Juvenile Justice Centre, John Warby Public School, Briar Road Public School, Airds High School and various parks and community facilities.

The Airds shopping centre caters primarily for the day-to-day convenience needs of nearby residents. The shopping centre is located within the centre of the Airds estate, making it accessible to most residents.

Campbelltown Business Centre Strategy (prepared by Hill PDA in 2005) and the NSW Department of Planning and Infrastructure's 'draft Southwest Subregional Strategy' identify Airds as a neighbourhood centre. Airds shopping centre consists of a supermarket, pharmacy, medical centre and an adjoining service station, tavern and indoor sports centre. Airds is served by a number of public schools and a neighbourhood centre for the local residents.

There are a number of lots in private ownership within the area together with land owned by Tharawal Aboriginal Corporation. No development is proposed on these sites and they do not form part of the land to which the Concept Plan application relates. The existing Busways bus depot located off Georges River Road and the adjoining Endeavour Energy site are also excluded from the development site.

There are a number of educational facilities located within and adjoining the site including Airds High School, Briar Road Public School and John Warby Primary School. Directly to the north-west of the study area are St Thomas Moore Primary and St Patricks College which are within walking distance of Airds.

Natural site features

The site consists of gently undulating terrain. A defining ridge runs north east to south west near to the eastern boundary and provides a number of localised high points and creates two main drainage catchments. The eastern edge of the site drains directly into Georges River whilst the western part of the site drains to Smiths Creek located near the western boundary of the site which flows into Bow Bowing Creek through the Campbelltown urban area and ultimately into Georges River.

An existing water body in the form of a pond is located near the shopping centre.

The site features are depicted in the Figure 3 below.

Figure 3: Existing Site Features



An existing undeveloped corridor, known as 'Smith's Creek Corridor', extends through the site in a north to south direction, which effectively divides the suburb of Airds from the suburb of Bradbury. The vegetation within the site includes: one critically endangered ecological community, namely Cumberland Plain Woodland, which is located to the rear and the immediate north of the existing town centre and one endangered ecological community, Shale Sandstone Transitional Forest, which is located primarily within the Smiths Creek Corridor towards the northern precinct of the site.

Land ownership

The site comprises the properties contained within Figure 4 below, excluding privately owned properties that are edged in red or owned by the Tharawal Aboriginal Corporation. No development is proposed on these sites and they do not form part of the land to which the concept plan application relates.

Figure 4: Land Ownership



Campbelltown City Council owns approximately 18 hectares of open space land, which forms part of the project. Open space land within the project site will be reconfigured and embellished as part of the renewal project. Remaining vacant and open space land within the site that is owned by the NSW Land and Housing Corporation or the Crown, will be transferred to Council as open space or developed for residential purposes.

2. PROPOSED PROJECT

2.1 Concept Plan Proposal

The project involves the long term (15 years) urban renewal of the public housing estates of Airds-Bradbury, increasing private dwelling ownership from 6% to 70% of the estate over the project lifecycle. The key components of the project are listed in Table 1.

Table 1: Key Project Components

Aspect	Description
<i>Project Summary</i>	The renewal of the Airds Bradbury public housing estate through the establishment of a new urban structure and new street pattern with subdivision layout based around a series of existing and new infrastructure
<i>New urban structure</i>	Establishment through urban renewal of a new urban structure including: <ul style="list-style-type: none"> • Introduction of a new street hierarchy with a series of new interconnecting streets • Retention of 53 seniors housing units and the provision of an additional 52 units • Rehousing the occupants of approximately 1058 public housing dwellings to be demolished or sold • The construction of approximately 1,172 new dwellings • Future development to occur in 12 stages over approximately 15 years
<i>Housing mix</i>	A resulting increase in total dwellings by 562 dwellings from 1,542 to 2,104, 30% of which will be public housing and 70% private and 58% of which will be new dwellings and 42% existing or retained dwellings. Varying lots sizes (subject to future DAs) from 200 sqm up to 500 sqm
<i>Social and physical urban infrastructure</i>	New and upgraded roads, utility services, parks and community facilities in association with the new residential development
<i>Demolition</i>	Approximately 531 mostly townhouse dwellings will be demolished, noting that NSW Land and Housing Corporation have already demolished 131 dwellings as development without consent
<i>Town centre</i>	The revitalisation and expansion of the existing town centre precinct, with new interconnecting roads, integration of community and similar land uses and improved accessibility.

The project layout is shown in Figure 5 overleaf.

Figure 5: Project Layout


Figure 6: Indicative lot layout and street tree planting

Figure 6 above illustrates the proposed lot layout and its relationship to existing or retained cottages. To complement the renewal project, the retained cottages will be progressively improved with building amendments such as façade upgrades, fencing, landscaping and provision of awnings or new windows. This work does not form part of the concept plan and is currently being undertaken as part of the NSW Land and Housing Corporation 'Community Renewal Strategy'.

Subsequent to the approval of the concept plan, separate Development Applications will be lodged for subdivision of land and the carrying out of any works, including the erection of buildings. The indicative staging plan is set out in Figure 7 below.

Figure 7: Staging



2.2 Project Need and Justification

The draft Southwest Subregional Strategy for the south western region of Sydney identifies a demand for additional housing within established areas. The dwelling targets for the south west region from 2006 to 2036 are 155,000 dwellings. Incorporated into the Regional Plan and Metropolitan Plan for Sydney 2036 is recognition of the need to provide an increasing choice and diversity of housing. The Airds Bradbury project will provide an additional 562 dwellings over its delivery lifecycle, as well as providing a greater diversity and standard of attached and detached dwelling forms.

From a social perspective the project aims are to achieve government objectives and NSW Land and Housing Corporation policy, which is to introduce a mix of private ownership (approximately 70% of the estate) within public housing estates (retain 30%) to create a sustainable, diverse and safe community. Other identified benefits of the renewal of public housing estates include:

- greater workforce participation,
- economic multiplier effect,
- lower crime levels, and
- reduced stigma.

NSW Land and Housing Corporation intends to replace the public housing dwellings 'lost' from the estate within the Greater Western Sydney region over the life of the project to align with its projected public housing client needs and the need to maintain the total stock number in the area.

2.3 Concept Plan

NSW Land and Housing Corporation has applied for approval of a concept plan under section 75M of the EP&A Act. The application sought is for the approval of a Masterplan of the site, which identifies the land use structure of the renewal project. Further approvals under Part 4 of the Act will be required for each of the 12 stages of the development.

2.4 Preferred Project Report

On 20 October 2011 the proponent amended details of the concept plan and provided further supplementary supporting documentation via the Preferred Project Report, to address issues raised in the agency and public submissions, and by the Council, in response to the Environmental Assessments. The amendments included clarification on a number of local street locations and shared ways, reorientation of proposed lots fronting Georges River Road to instead face the internalised road system, further information supporting biodiversity and a revised Statement of Commitments.

The Council considered the proposal at its meeting of 13 December 2011 and resolved to support the Concept Plan with the exception of the area currently occupied by Baden Powell Reserve. This decision was conveyed to the Director General by letter dated 16 December 2011. Discussions and negotiations between Council and the proponent have been ongoing in order to come to a mutually agreeable position. The final response to submissions and Preferred Project Report dated May 2012 (submitted to Council on 31 May 2012) provides a revised Concept Plan which increases the proposed area of Baden Powell Reserve and correspondingly decreases the proposed area of Merino Reserve. The revised concept plan within the Preferred Project Report was not acceptable to Council, however, a further indicative layout was outlined in a letter to Council from Landcom dated 21 June 2012 that is considered acceptable and this issue is discussed in more detail in Section 5.6 of this report.

3. STATUTORY CONTEXT

3.1 Major Project

The Executive Director, Major Projects Assessment, as delegate of the then Minister for Planning, declared the proposal a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it is development for the purpose of residential commercial or retail development with a construction investment value of more than \$100m, under Clause 13, Schedule 1 of the Major Development SEPP. The Executive Director, Major Projects Assessment, as delegate of the then Minister, also authorised the submission of a concept plan for the project under section 75M of the Act. Therefore the Minister for Planning and Infrastructure is the approval authority.

Part 3A of the EP&A Act, as in force immediately before its repeal on 1 October 2011 and as modified by Schedule 6A to the Act, continues to apply to transitional Part 3A projects. Director-General's environmental assessment requirements (DGRs) were issued in respect of this project prior to 8 April 2011, and the project is therefore a transitional Part 3A project.

The Director-General of the Department of Planning and Infrastructure delegated the assessment of the concept plan to Campbelltown City Council under section 23(1)(d) of the Act on 16 December 2010.

Consequently, this report has been prepared by Council in accordance with the requirements of Part 3A and associated regulations, and the Minister (or his delegate) may approve or disapprove of the Concept Plan under section 75O of the Act and approve or disapprove under section 75P of the Act, the carrying out of the demolition stage of the project under section 75J of the Act without further environmental assessment.

3.2 Delegated Authority

The Minister has delegated his functions to determine concept plan applications under Part 3A of the Environmental Planning and Assessment Act 1979 to the Deputy Director-General, Development Assessment and Systems Performance where:

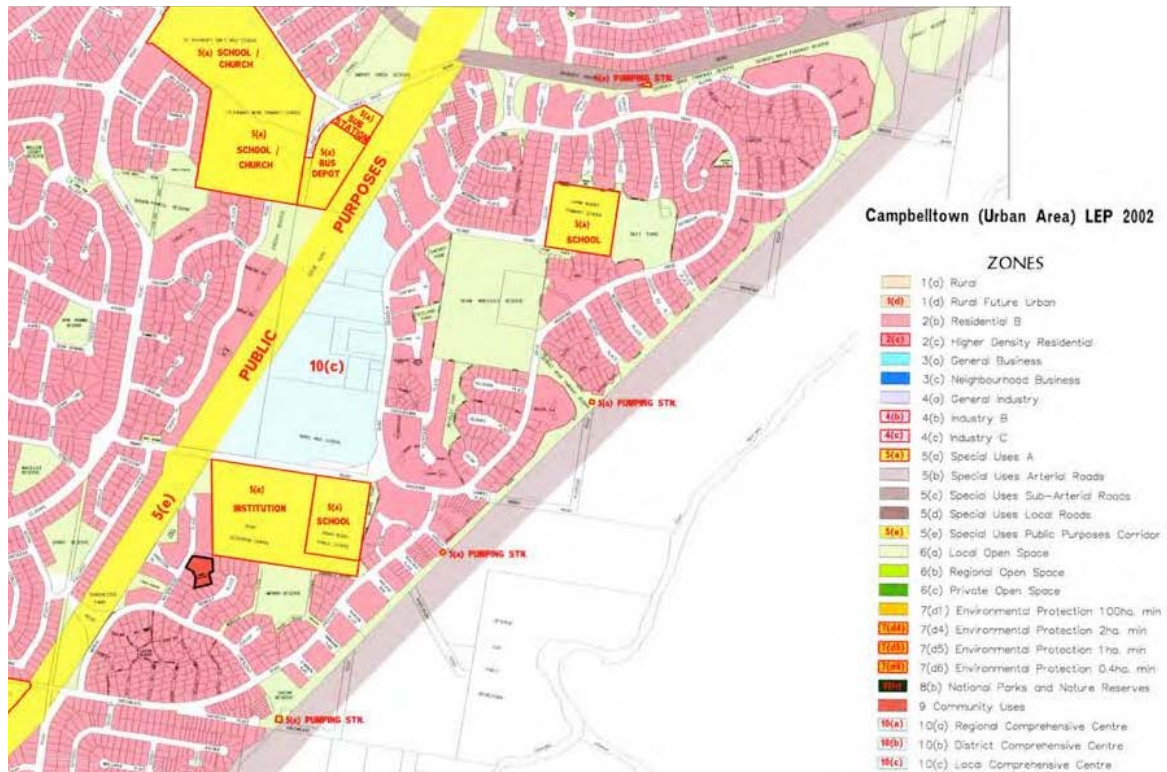
- the development the subject of the application is consistent (in the opinion of the delegate) with the Metropolitan Plan for Sydney or the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning and endorsed by the Minister, and
- the council has not made an objection, and
- a political disclosure statement has not been made in relation to the application, and
- there are less than 25 public submissions objecting to the proposal.

The concept plan is consistent with the relevant Strategy (see Section 2.2). There were 22 submissions received from the public objecting to the proposal. The Council has not made an objection to the proposal. No political disclosure statement has been made for this application or for any previous related applications, and no disclosures made by any persons who have provided a submission regarding this application.

Accordingly the application is able to be determined by the Deputy Director-General Development Assessment and Systems Performance, under delegation.

3.3 Permissibility

Under Campbelltown (Urban Area) Local Environmental Plan 2002, the predominant zone within the site is 2(b) – Residential which affects the residential component of the site. Other zones include the 10(c) Local Comprehensive Zone which covers the existing town centre and adjoining high school, 6(a) Local Open Space and a number of special uses zones for the school sites, bus depot, juvenile justice centre and transport corridor/s land. The various zones are illustrated in Figure 8 below.

Figure 8 – existing land zoning

In the terms of Section 75O(3) of the EP&A Act and Clause 8N of the EP&A Regulation, the proposed development is partially prohibited, (however the site is not located within an environmentally sensitive area of State significance or a sensitive coastal location) and consequently the Concept Plan application can be approved. There are some areas of the site where residential development is proposed, but presently prohibited, such as the Smiths Creek Corridor land and open space areas that are proposed to be acquired by the proponent adjoining Georges River Road. Whilst presently prohibited it is intended that the zoning will be amended as part of Campbelltown's comprehensive LEP process to make such residential development permissible and consistent with the terms of an approved Concept Plan over the site.

In the meantime the Savings and Transitional provisions contained within Schedule 6A of the Act, will allow development to occur and be approved on the site under Part 4 of the Act, subject to any such proposal being consistent with the approved Concept Plan.

The proponent has also requested that the Minister amend the current LEP via the mechanism of s75(3A) of the Act to facilitate the sale of the land that would otherwise still be zoned as open space or identified as roads. This is a separate process that will need to be undertaken after determination of the concept plan.

3.4 Environmental Planning Instruments

Under Sections 75I(2)(d) and 75I(2)(e) of the EP&A Act, the Director-General's report for a project is required to include a copy of, or reference to, the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project, and the provisions of any environmental planning instruments (EPI) that would (except for the application of Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the assessment of the project.

The Council's consideration of relevant SEPPs and EPIs is provided in Appendix D.

3.5 Objects of the EP&A Act

Decisions made under the EP&A Act must have regard to the objects of the Act, as set out in Section 5 of the Act.

The Objects stipulated under section 5(a) of the Act are significant factors in reaching a determination of the concept plan and project applications. The relevant objects are:

- (a) *to encourage:*
 - (ii) *the promotion and co-ordination of the orderly and economic use and development of land,*
 - (iii) *the protection, provision and co-ordination of communication and utility services,*
 - (iv) *the provision of land for public purposes,*
 - (v) *the provision and co-ordination of community services and facilities, and*
 - (vi) *the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
 - (vii) *ecologically sustainable development, and*
 - (viii) *the provision and maintenance of affordable housing, and*

The Concept Plan does not raise significant issues with regards to the objectives of the Act. The Council has considered them in the assessment of the concept plan Application and balanced them against the merits of the proposal in Section 5 of this report. It finds that the proposal is consistent with the objects of the Act and provides an efficient utilisation of land that responds to the environmental constraints of the site. Importantly, through the future Voluntary Planning Agreement, the proposal will provide embellished and improved community facilities and open spaces area which will compliment and service the increased residential population that will result from the development.

3.6 Ecologically Sustainable Development

The EP & A Act adopts the definition of Ecologically Sustainable Development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of the following principles:

Integration Principle

The social and economic benefits of the proposal have been addressed in the Environmental Assessment report. The report considers both the economic impact and environmental impact of the development. Substantial areas of the site with high ecological value have been identified for protection within public open space and bushland areas. Development within other areas of the subject site will provide for a mix of uses and housing options which will enhance social and economic benefits to the community such as providing opportunities for jobs and housing close to public transport, and improved housing choice.

The Precautionary Principle

The Environmental Assessment report is supported by technical and environmental reports that conclude that the proposal's impacts can be successfully mitigated. No irreversible or serious environmental impacts have been identified. An approval for the Concept Plan would require additional information at each stage of development to ensure the proposals' extent and nature is fully documented and opportunities are provided for proposed mitigation and management measures to minimise the impact of the development. This would include matters such as biodiversity off-sets. Further, the recommended concept plan modifications include mitigation and management measures to minimise the impact of the proposed development.

Inter-Generational Equity

Through implementation of the concept plan and environmental management practices, the environment is protected for future generations. The benefits of the proposal include the provision of embellished open space and protection and rehabilitation of core ecological habitat. The development also improves the social integration of the development with the greater Campbelltown community through increasing private ownership of dwellings within the development. The new urban structure with interconnecting streets will also increase connectivity and proximity of dwellings to the town centre and public transport.

Conservation of Biological Diversity and Ecological Integrity

It is considered that the proposed protection of native vegetation within the bushland area and the proposed off-setting will maintain or improve biodiversity values and the long-term viability of a local population of species, population or ecological community or their habitat. It will also facilitate the protection of a substantial area of critically endangered ecological communities.

Improved Valuation, Pricing and Incentive Mechanisms

The cost of measures to mitigate and manage, on an ongoing basis, any potential impact of the proposed development of the site, has been incorporated into the Capital Improvement Value of the project. Thus, the developer will bear the cost of these measures. It is difficult to assign a monetary value to environmental assets that have not previously been commodified. Further assessment of ESD principles is also provided in subsequent sections of the report.

3.7 Statement of Compliance

In accordance with section 75I of the EP&A Act, the Council is satisfied that the Director General's environmental assessment requirements have been complied with.

3.8 Environment Protection and Biodiversity Conservation Act

The *Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)* commenced on 16 July 2000. Under the assessment and approval provisions of the EPBC Act, actions that are likely to have a significant impact on a matter of national environmental significance are subject to an assessment and approval process. An action includes a project, development, undertaking, activity, or series of activities.

The site contains two vegetation communities that are listed as critically endangered and endangered ecological communities under the EPBC Act, these being the Cumberland Plain Woodland (CPW) and Shale Sandstone Transitional Forest (SSTF).

The Airds Bradbury Renewal Project has been referred to the Commonwealth Minister for Environment and Heritage under the EPBC Act. The Commonwealth declared the project as a 'controlled action' in a determination made in December 2011. The final biodiversity off set package will be reviewed by the Department of Sustainability, Environment, Water, Population and Communities for consent for the project under the EPBC Act.

4. CONSULTATION AND SUBMISSIONS

4.1 Exhibition

Under section 75H(3) of the EP&A Act, the Director-General is required to make the Environmental Assessment (EA) of an application publicly available for at least 30 days. After accepting the EA, Campbelltown City Council publicly exhibited it from 15 June 2011 until 18 July 2011 (32 days) on the Department's and Council's website and at the Department of Planning and Infrastructure, Information Centre (Bridge Street, Sydney), Campbelltown City Council, HJ Daley Library (Campbelltown) and on-site at the NSW Land and Housing Corporation office at Airds. Council extended the advertising period for a further 28 days until 15 August 2011 given concerns raised by members of community in respect to viewing the EA documentation. The Council also advertised the public exhibition in the Sydney Telegraph on 18 June 2011 and notified residents, local community groups and relevant State government authorities in writing.

It is important to note that this formal exhibition process was preceded by extensive engagement with the local community through a community consultation process that culminated with a community workshop promoted as "Design outLOUD". This workshop, held over three days (20-22 May 2010) at Airds High School, brought the community together in a series of workshops that enabled a large number of people to have direct input into the design process. Over 150 people attended.

Council received 37 submissions during the exhibition of the EA – 8 submissions from public authorities and 29 submissions from the general public and special interest groups. Of the 29 submissions received from members of the public, 22 raised objections to the development in part or whole and 7 submissions did not object outright but nonetheless raised concerns or issues for further consideration. Included in the 22 submissions objecting to the development is a petition, which in accordance with the Instrument of Delegation dated 28 September 2011 by the Minister, is counted as one submission.

The NSW Land and Housing Corporation, in conjunction with Council Officers and Landcom representatives also held four public information sessions when the Masterplan was on public exhibition. These sessions were held on 9 and 10 August 2011.

A summary of the issues raised in submissions is provided in Table 3 below.

4.2 Public Authority Submissions

Eight submissions were received from public authorities. None of the agencies objected to the development, but raised issues and requested further information or clarification regarding certain aspects of the development. The Final Response to Submissions and Preferred Project Report contains a table summarising the proponents response to all submissions and this is Appendix C. Issues raised by State agencies are also addressed in section 5 of this report.

4.3 Public Submissions

A total of 29 public submissions were received during the exhibition period. This included submissions from the following special interest groups:

- Student group from Airds High School,
- National Parks Association of NSW, and
- Airds Bradbury Masterplan Group.

Of the 29 public submissions received, 22 (76%) objected to the project and 7 (24%) did not object but raised concerns. The key issues raised in public submissions are listed in Table 3 below.

Table 3: Summary of Issues Raised in Public Submissions

Issue	Proportion of submissions (%)
Housing relocation and displacement of public housing tenants as a result of the development	30
The proposed extension of Campbellfield Avenue into Bradbury will unnecessarily result in the demolition of existing houses and that the road will pose adverse amenity impacts upon residents	20
Loss of bushland, particularly Cumberland Plain Woodland and the impact upon local flora and fauna	12
Increased traffic and that intersections should be appropriately designed and sized to accommodate the development	10
Provision of more seniors housing development and accessible housing forms	10
Road widths are too narrow and should be increased	8
Incorporation of sustainable development measures including devices that limit and control run off into nearby natural water courses	8
Smiths Creek should be rehabilitated and limiting further pollution of local waterways and Smiths Corridor retained as open land	8
Improvements to local bus service and encouragement of public transport orientated development	7
The Masterplan did not show the retention of existing community facilities or provision of new community facilities	5
Provision of urban infrastructure, such as bus stops, rubbish bins, and other associated facilities	5
Increased provision of pedestrian and bicycle tracks	5
Over the lifecycle of the development there is expected to be a reduction in children within the estate and this is likely to result in a drop in student numbers at the existing public primary and high school and will have an overall detrimental impact upon those schools.	4

A number of the issues raised centred around housing displacement and the relocation of public housing tenants. Generally these issues are not considered relevant to the planning considerations of the concept plan. Whilst these issues are recognised as being important and need careful management, they are essentially matters for consideration by the NSW Land and Housing Corporation. As part of the project, the NSW Land and Housing Corporation have established a housing relocation team to assist tenants in the housing relocation process. Furthermore a Social Strategic Plan will be undertaken in accordance with the Statement of Commitments, ensuring that the proponent will implement actions to deal with existing housing tenant needs and facilities during delivery lifecycle of the development.

The Council has considered the issues raised in submissions in its assessment of the project.

4.4 Proponent's Response to Submissions

Following the initial exhibition of the project, Council provided the proponent with details of the submissions made by members of the public and government agencies. Issues of concern to Council were also raised with the proponent. This allowed the proponent to review and amend where required, the concept plan. Amendments to the original project included clarification on a number of local streets and shared ways, reorientation of proposed lots fronting Georges River Road to instead face the internalised road system, further information on dwelling typologies and development control guidelines. During this period, Council facilitated further discussions with the proponent and with government agencies, namely the Office of Environment and Heritage, who made a further submission in relation to the proposed bushland management and biodiversity offset package.

A Final Response to Submissions and Preferred Project Report in May 2012 was received which included more details of the bushland management plan and biodiversity offset package. This issue is discussed further in Section 5.2 of this report. It also provided revisions of open space layouts at Baden Powell Reserve and Merino Reserve to address concerns that had been raised by Council and this is discussed further in Section 5.6 of this report. Appendix C is the summary of responses to submissions contained within the PPR.

5. ASSESSMENT

The key environmental issues for the project are considered to be:

- Urban design and future development guidelines
- Biodiversity
- Traffic, transport and accessibility
- Social infrastructure and services
- Provision and embellishment of open space
- Development Contributions
- Residential Amenity
- Indigenous and non indigenous heritage
- Water cycle management
- Bushfire risk
- Subdivision
- Geotechnical and contamination
- Utilities

5.1 Urban design and future development guidelines

The proponent states that the built form envisaged under the Concept Plan has been driven by the suburban character of the surrounding area and the need to increase density and achieve increased housing provisions in areas with good access to services and transport. The renewal project will reduce the concentration of social housing to 30% of all dwellings and will follow the traditional pattern of houses and front yards addressing the street, as opposed to the current Radburn design of the estate.

The majority of the renewed estate will be one or two storeys in height so that the proposed development is consistent with the suburban character of the adjoining residential suburbs. It is expected that the predominant built form will be detached and attached dwelling houses with some small lot housing forms and seniors units. The renewal project requires new streets and land uses to integrate into and with existing built form, resulting in some

restrictions on the ability to locate streets and regular block patterns. Included in the proposal is uniform street planting on both sides of the street and a street fencing strategy.

The proponent has provided sufficient examples of building typologies demonstrating that an acceptable built outcome can be achieved. Notwithstanding this, NSW Land and Housing Corporation propose to accommodate a range of housing types on lot sizes that are less than that allowable (below the minimum of 500 square metres) under the Campbelltown (Sustainable) City DCP 2009 (the DCP).

Consequently alternative Airds Bradbury Urban Renewal Development Control Guidelines are proposed, which will form part of the Concept plan approval. The key areas of difference in respect to the Development Control Guidelines and Council's Development Control Plan are outlined in the table below:

Development control	Council DCP requirement	Airds/Bradbury Development Control Guidelines	Council comment
Minimum site area	350 sq m for multi dwelling and 500 sq m for isolated subdivisions	Minimum 200 sq m, however average lots likely to be in the vicinity of 350-450 sq m.	The development proposes increased densities around the town centre, with larger conventional allotments on the periphery of the estate. This is considered a reasonable response given the masterplan nature of the project.
Primary street setback	5.5m	4.5m	The variance of 1m between the two controls is considered acceptable given the masterplan nature of the site and that it reflects contemporary planning standards and is consistent with the State housing code.
Rear boundary setback	5m	3m for properties less than 450 sq m and 4m for properties greater than 450 sqm.	The design guidelines allow a reduced setback, which can be successfully managed on an individual merit basis, subject to identification of privacy, overshadowing and bulk/scale assessment.
Side boundary setback	0.9m	0.9m unless built to boundary for zero lot line	The design guidelines allow zero lot line construction for attached and integrated dwellings. This encourages a mix of housing and increased densities within and adjoining the town centre precinct,
Garage dominance	50%	50%	Consistent with council DCP
Garage setback	6m	5.5m and 1m for rear lanes	5.5m is considered acceptable in this instance and is consistent with State housing code
Dwelling height	9.5m uppermost roof height	9.5m uppermost roof height	Consistent with council DCP

Development control	Council DCP requirement	Airds/Bradbury Development Control Guidelines	Council comment
Site coverage	No site coverage control however floor space ratio control of 0.55:1.	Dependant on lot sizes, ranges from 70% for 200 sq m allotments to 55% for 600-900 sq m allotments.	Whilst the Council and the Airds Bradbury Design Guidelines use different site coverage and density controls, the net result is that the Guidelines will limit bulk and scale in order to achieve an acceptable level of residential amenity
Private open space	A minimum area of 75 sq m and a levelled area of 5m x 5m.	16 sq m for lots sized 200-300 sq m and 24 sq m for properties above 300 sq m. minimum dimension 4m x 4 and 6m x 4m respectively	There is a considerable variance between the design guidelines and Council's DCP, however given the limitations on site coverage contained in the design guidelines, there will be sufficient open space and landscaped area within allotments. The unencumbered open space area of 20 sq m is consistent across the DCP and design guidelines.
Car parking	One under cover garage space per dwelling	One covered space per dwelling	The design guidelines require a covered space, which is consistent with the intent of Council's DCP which requires a covered garage

The alternate development standards proposed in the Design Guidelines for the Airds Bradbury estate are generally consistent with those included within the State Environmental Policy (Exempt and Complying Development Codes) 2008 and are also consistent with the planning controls that have been successfully used for previous renewal projects in Campbelltown, such as the Minto Renewal area. The development guidelines which have been used in the Minto renewal project have proven to be successful in delivering a high level of urban amenity, that compliments existing urban areas, yet establishes the unique urban character of the Minto renewal project.

In this regard, any subsequent Development Applications will be required to be designed having regard to the Airds Bradbury Urban Renewal Development Control Guidelines and Concept plan approval. A detailed assessment of the proposed dwellings and general built form of each precinct will be further considered at the DA stage.

Contained within the response to submissions was an issue surrounding the interface of the proposed development with Reiby Juvenile Justice Centre. This was raised by The Department of Juvenile Justice who had requested a 30m setback around the Reiby facility. This is considered an unreasonable request given that there is existing residential development adjoining the Reiby facility that is intended to be retained that maintain dwelling setbacks of approximately 10 metres. The final Concept Plan has new development directly adjoining the Reiby facility on its western boundary only and for such development it is recommended that a 6m rear building setback should be imposed to mitigate the potential impact between the two land uses. This requirement should be reflected in the Airds Bradbury Urban Renewal Development Control Guidelines and a recommended modification to the concept plan to this effect has been included in the Concept Approval instrument.

Given the nature of the renewal project and importance placed on improving the image and urban identity of the estate it is recommended that the proponent provide estate entry

statements. The entry statements shall be low scale landscaping features located at key locations, for example at the junction of Riverside Road and Georges River Road. A modification to the concept plan approval has been recommended that requires the proponent to provide details to Council's satisfaction prior to lodgement of a Development Application for Stage 1.

5.2 Biodiversity

Investigations into the ecological qualities of the site have been undertaken by Hayes Environmental in their report included within the EA. The proponent, through the ecological report, identifies the following ecological attributes of the site:

Cumberland Plain Woodland (CPW)

A small patch of approximately 4.2 hectares of CPW occurs immediately to the north and west of the existing Airds shopping centre. CPW is listed as a critically endangered ecological community under the EPBC Act and TSC Act. The patch has been disturbed through selective clearing, rubbish dumping, and edge effects and is crisscrossed by tracks and services. The shrub layer is generally absent or very sparse and groundcover, whilst containing a variety of native species, has been consistently mown. The ecological report recommends a three hectare patch be conserved and rehabilitated under the concept plan to maintain its ecological values. Whilst the majority of the Cumberland Plain Woodland would be retained there will be the loss of the north eastern fringe of the main patch of Cumberland Plain Woodland within the subject site, and the loss of two small isolated stands (a combined area of approximately 1.21 hectares).

Shale Sandstone Transitional Forest (SSTF)

The northern section of the undeveloped and now redundant road corridor (Smiths Creek Corridor) and land along Smiths Creek to the west and north of the Busways Bus Depot, contain a mosaic of modified but regenerating Shale Sandstone Transition Forest and abandoned pasture. SSTF is listed as an endangered ecological community under the EPBC Act and the TSC Act. The total area of SSTF within the project area is 8.15 hectares, with 3.74 hectares proposed to be retained and 4.41 hectares is proposed to be lost from the site due to residential development.

Smiths Creek

Vegetation within the riparian zone of Smiths Creek has been degraded through weed invasion to the extent that it barely constitutes a native vegetation community. The riparian area will be subject to the provision of a minimum 20m riparian zone that the proponent will be required to rehabilitate through ongoing staged development. It is also expected to form a component of the future Voluntary Planning Agreement that will be entered into with the Council prior to any future Development Application.

Southern part of Smiths Creek Corridor

The southern section of the undeveloped redundant Smiths Creek Corridor, i.e. south from and approximately level with Hartigan Way which is on the western side of the corridor, consists of cleared open grassland with scattered trees. The grassland contains a mixture of native and exotic grass species. The area is disturbed through mowing and burning and is not representative of any native ecological community.

Existing Pond

An existing pond is located to the southwest of the Airds shopping centre. The pond collects run-off from the upslope residential development and has been significantly affected by rubbish dumping and weed invasion. The pond is ringed by macrophytic vegetation, with open water in its centre. Surrounding lands consist of cleared open grassland dominated by exotic species.

Scattered Trees

Scattered trees occurring throughout the residential and business zones of the study area, including the open space areas within the Georges River Road reserve, are generally remnant native species from the ecological communities that would once have occurred across these parts of the study area, i.e. Cumberland Plain Woodland and Shale Sandstone Transition Forest, along with some planted ornamental specimens. There are no intact areas of native bushland in these zones.

Georges River Parkway

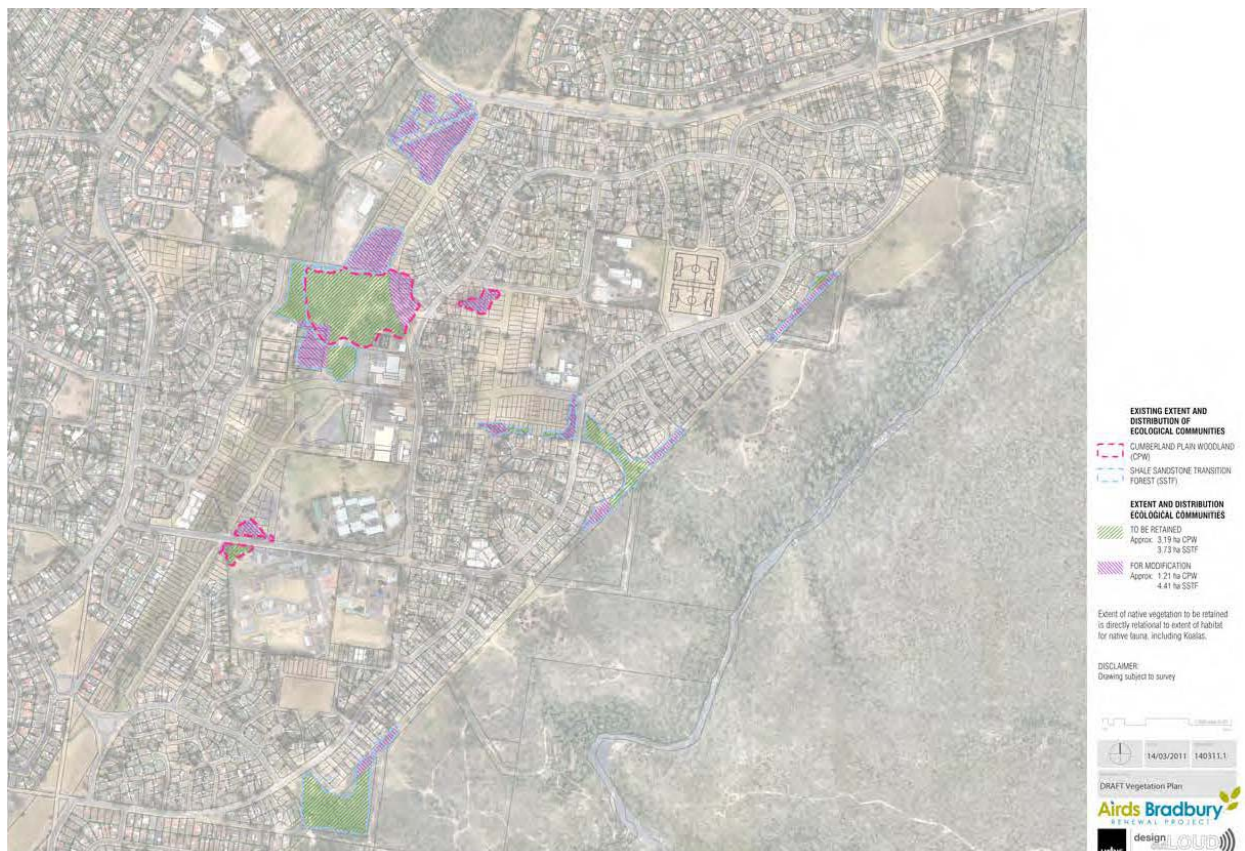
The western fringes of the Georges River Riverside Reserve immediately east of the study area, have been substantially disturbed through clearing, thinning and burning adjacent to the existing residential development. However, to the east of the disturbed fringe, the reserve contains large areas of relatively intact native vegetation, identified by NPWS (2002) as predominantly Shale Sandstone Transition Forest and Upper Georges River Sandstone Woodland.

Koala habitat

The concept plan proposes the retention of two existing narrow corridors of bushland which lead into the site from the Georges River Riverside Reserve. The Hayes ecological report identifies that these areas appear to be used occasionally by koalas and provide a potential refuge for koalas fleeing bushfire. Existing vegetation within these corridors would be retained and additional trees and shrubs shall be planted to facilitate use of the corridors by koalas.

Figure 9 below, provides a map showing the key ecological communities present on the site.

Figure 9 Biodiversity within the site



Impact of proposal

The CPW and SSTF are currently in poor condition, highly degraded and subject to significant edge impacts from urban development. Enhancement of the retained 3 hectare patch of CPW northwest of the existing Airds Shopping Centre, through removal and control of weeds, rationalisation of existing tracks, controlled pedestrian and bike access and supplementary tree and understorey plantings, is considered a positive outcome of the development. These actions are set out within a draft Bushland Management Plan that has been prepared by Hayes Environmental and submitted as part of the Preferred Project Report. Notwithstanding this, development in accordance with the Concept plan would result in the loss of 5.62 hectares of degraded native vegetation and habitat. It is considered that this loss is compensated by the implementation of protection and management measures to enhance the viability of 6.6 hectares of currently degraded vegetation and with further revegetation opportunities available.

Impact mitigation and offsetting

These opportunities exist within the north western corner of the site at Smiths Creek and immediately east of the site within the Georges River Riverside Reserve. Both areas can be constructively managed for conservation in a way not previously achieved. The bushland management plan and the biodiversity offset package, which are complementary, will introduce a planned regime of weed control, supplementary planting, revegetation, fire management for conservation, management of human disturbance, erosion control, nutrient control and management of dead timber. The biodiversity offset package in particular, will provide impetus to the Cumberland Plain Recovery Plan that was prepared by the NSW Department of Environment and Climate Change in January 2011. This plan covers both the CPW and SSTF communities

The Concept plan approval would be subject to revegetation of SSTF on available lands along the Smiths Creek corridor and implementation of weed control strategies for the corridor. These actions are set out within the Bushland Management Plan. The intent of works should be to increase viability of retained areas of SSTF within the Airds Bradbury site and to compensate for loss of habitat outside the site.

In the north west corner of the site, Smiths Creek is protected within a suitable riparian buffer afforded by the Smiths Creek Reserve which is being maintained and embellished. The riparian corridor then leaves the site and traverses the adjoining school land before entering the site again at the northern end of Creigan Road. Upstream of this point the water flow is piped. There is no development proposed within the existing riparian zone.

It is intended that when the Bushland Management Plan is finalised that the long term protection of this bushland be subject to a legal agreement between Council and NSW Land and Housing Corporation as part of the Voluntary Planning Agreement being entered into between the parties. Notwithstanding this, it is important to reiterate that both the CPW and the SSTF are threatened ecological communities and that neither the State government Office of Environment and Heritage (OEH) and the Department of Planning and Infrastructure or the federal Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) have given final approval to the proposed off setting strategy. Accordingly, the biodiversity offset package would need to be prepared to the satisfaction of OEH prior to approval by all parties prior to any future application.

A future assessment requirement has been included within the draft Concept Approval instrument that requires the final biodiversity offset package to be consistent with the biodiversity offsetting principles recommended by the Office of Environment and Heritage. This package is to be endorsed by OEH and approved by the Director-General of the Department of Planning and Infrastructure prior to any future Development Application being lodged. It is considered that these measures are sufficient to offset any impacts on the biodiversity qualities of the site arising from the proposed development. A future assessment

requirement has been recommended that requires the measures in the offset package be implemented prior to the determination of any application involving the removal of any CPW and SSTF.

5.3 Traffic, transport and accessibility

The key transport objectives of the project are:

- Remove the heavy Radburn influence evident within the study area by improving linkages and overall connectivity within Airds Bradbury and to surrounding areas, focused on improvements to Riverside Drive, the main circular route through the study area and the introduction of a new east-west road link
- Improve vehicular and public transport access within Airds Bradbury and to adjoining areas,
- Optimise the location of the town centre having regard to the existing and future road network and public transport networks,
- Remove existing unsafe pedestrian underpasses, and
- Provide safe and direct cycleways and pedestrian linkages connecting local services, schools and open spaces in Airds Bradbury as well as to other neighbourhoods.

Regional traffic network

The development is not located adjacent to any arterial roads. The Georges River Road, which acts as the northern border to the site, is a sub-arterial road. A number of intersections within and adjoining the site are proposed to be upgraded as part of the development. Subject to these works occurring (see figure 10 below), the environmental capacity, also known as the operating capacity, of the local and regional traffic network will not be adversely affected.

Local road network

The NSW Land and Housing Corporation suggest that the Concept Plan provides an upgraded urban structure based on a more interconnected street system and improved access from the surrounding local road network. This provides an improved sense of arrival and gateway presentations for the area while improving the integration of the estate with the surrounding area.

The transport and accessibility report has considered the increased traffic associated with the development and finds that the concept plan is acceptable subject to a number of minor intersection upgrades. The majority of existing intersections within the project area are already operating at sufficient capacity, generally at Level A or B and subject to minor rectification works these intersections are expected to maintain their current, or improved, level of service and safety well into the future. Level A or B service levels are associated with limited delays at intersection, which is in the vicinity of 10-15 seconds.

The main traffic works proposed to the local road system to mitigate the development impacts include:

- Upgrade of Georges River Road / Junction Road intersection (roundabout) with an additional approach from Peppin Crescent
- Upgrade of Georges River Road / Bellinger Road intersection (give-way) with an additional approach from Deans Road
- New single lane roundabout for Georges River Road / realigned Riverside Drive
- New single lane roundabout for St Johns Road / extension of Campbellfield Avenue.

Figure 10: identifies the proposed intersection upgrades

Source: AECOM, 2011

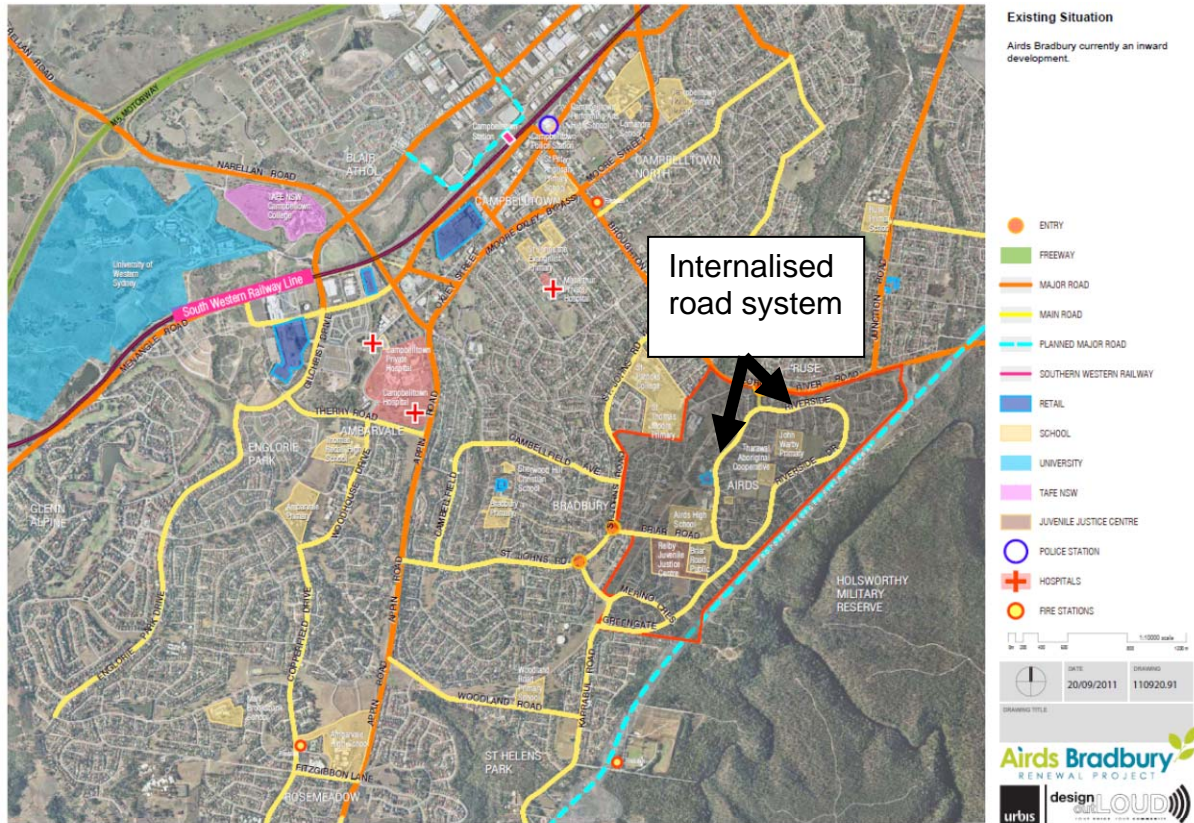
The traffic report satisfactorily addresses the likely traffic impacts emanating from the development. The intersection upgrades can occur in a staged manner as the project is progressively undertaken. The levels of service provided at local intersections are satisfactory, with the suggested intersection upgrades maintaining or improving current service levels.

Whilst there were some issues raised from resident submissions regarding traffic impacts, the proposed upgrades to existing intersections will maintain an efficient and safe local road network. The proposed new roundabout at the Campbellfield Avenue and St Johns Road intersection will be located more than 300m north of Briar Road roundabout. The spacing of these intersections is considered acceptable along St Johns Road.

The design details of this and other intersections will be resolved further at the individual Development Application stages.

Proposed East west road link

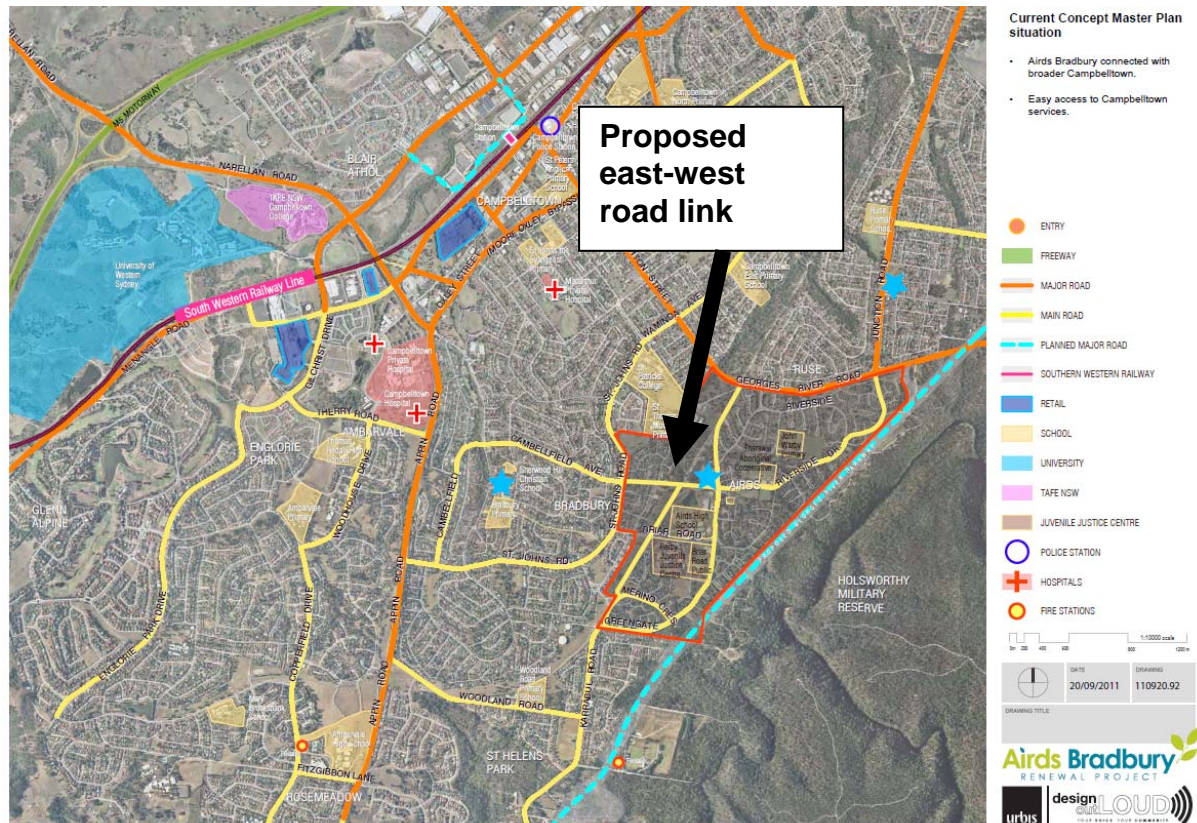
The project proposes the creation of a new east west road link which will provide a direct connection between Airds and Bradbury and provide improved access to the east of the subject site. Historically this connection has been severed due to the location of the Smiths Creek Corridor, which is now redundant. Currently, Airds has an internalised street system that does not integrate with the adjoining areas. The existing system is depicted in Figure 11 below.

Figure 11: The existing street system in Airds

The project identifies several benefits of the east-west link road, which include:

- A more inter-connective street system that will link Airds with the surrounding area and complement the social integration that will be achieved by the renewal program
- Improved access to Campbelltown via Campbellfield Road due to its direct connection to The Parkway, thereby providing a more efficient bus link from Airds Bradbury to Campbelltown city centre
- The proposed Airds Town Centre will be located at the junction of two major intersecting roads (Riverside Drive and the new section of Campbellfield Road) with more public land uses located towards the intersection, and
- The proposed new road will provide important vistas into Airds travelling from the west and to the town centre providing a point of entry and gateway and enhance way-finding. This gateway will function as a point of arrival at Airds.

The east-west link road (Campbellfield Avenue extension) is shown in figure 12 below.

Figure 12: Proposed east west road into the Airds town centre

The proposed street system above shows the extension of Campbellfield Avenue into the Airds estate, providing a direct linkage into the town centre and the future community facilities and open space areas. The new road system also provides improved security and safety with increased movement of people, circulation and greater passive surveillance around the shops and public open space areas. The east-west and other interconnecting roads will also assist with health and amenity benefits, with a better connected neighbourhood allowing and encouraging persons to travel within the 400m walkable distance of the town centre.

The east-west road link is critical to the success of the whole project, as it provides direct benefits to the town centre and connectivity across the estate. The project aims to expand and improve the viability of the town centre, which is important in creating a 'sense of place', where the newly developed Airds is recognised as a vibrant and well connected destination.

Pedestrian and cycle networks

The concept plan proposes a network of on and off road cycle paths to improve cycle access within the site and connections with surrounding areas and existing cycle paths. Footpaths will be provided along all roads (except laneways). Additional pedestrian refuges are proposed outside schools, major open spaces, senior living areas as well as the town centre, to facilitate safe crossing opportunities for pedestrians. The existing pedestrian underpasses in the vicinity of the town centre will be closed and replaced by more direct on-road pedestrian crossing facilities. This action is supported as the underpasses presently create an unsafe environment for residents.

Details of the location and arrangement of pedestrian and cycle networks proposed as part of the development are found in the EA.

The proposed pedestrian and cycle networks will complement the new urban structure, which promotes a better connected community. Whilst the cycleways are restricted to 2m in some

parts of the concept plan, generally the development achieves Council's requirements of 2.5m shared pathways.

Public transport

The road network and intersection treatments have been designed to accommodate efficient bus movements between Airds and Campbelltown. The proponent has conducted significant consultation with Busways to develop an indicative bus network for Airds Bradbury. The proposed bus routes are shown in the EA report and generally reflect the new road hierarchy for the project. Included within the draft VPA that accompanied the Concept plan was new and upgraded bus stops and shelters. These will be further discussed with Council and the local bus company.

The proposed Concept Plan incorporates an improved bus network to maximise accessibility of Airds Bradbury to the new town centre, schools and other local recreational facilities (open spaces and sports grounds). The Concept Plan allows two way bus movements and provision for bus stops with seating and signage. Ninety (90) percent of the renewal area will be within 400 metres of a bus route, which provides significant social benefits. A significant benefit of the project is that the proposed east-west road link will improve the provision of the local bus network.

5.4 Social infrastructure and services

The provision of community services and the social impacts of the development have been the subject of an Integrated Social Sustainability and Health Impact Assessment and Plan submitted with the EA. Since exhibition of the EA, NSW Land and Housing Corporation have continued discussions with Council, service providers and the community regarding the community facilities to be provided under the concept plan and as part of the VPA.

NSW Land and Housing Corporation will prepare a Strategic Social Plan as recommended by the Integrated Social Sustainability and Health Impact Assessment and Plan. This will address the provision of social and community services for residents of the estate and is included in the Statement of Commitments.

The provision of community facilities includes a proposed new multipurpose community facility located within the town centre and the provision of a child care centre. The new facility would integrate the services currently provided at Council's Youth Centre, the Family & Neighbourhood Centre and the Amarina Child Care Centre. The timing of delivery of these facilities is contingent upon the staging plan for the development and the final agreements reached between the proponent and Campbelltown City Council that will be formalised through the Voluntary Planning Agreement. Part of the strategy will be for these existing facilities to remain for an agreed period of time and be moderately embellished in the meantime. After the agreed period, the new purpose built community facilities will be constructed within the town centre precinct.

The provision of new community and upgraded community facilities is considered a necessary component of the rejuvenation of the Airds-Bradbury estates. The delivery, design and scope of the community facilities have been included within the draft VPA, which will be formalised once the Concept Plan has been determined.

As the Strategic Social Plan is to be developed in collaboration with local residents, nongovernment organisations and government agencies, it will effectively deal with the transitional issues that will invariably arise as the concentration of public housing tenants decrease and new private residents increase. It is important that during this transitional period that existing services for public housing tenants are still provided and their specialised needs are adequately addressed.

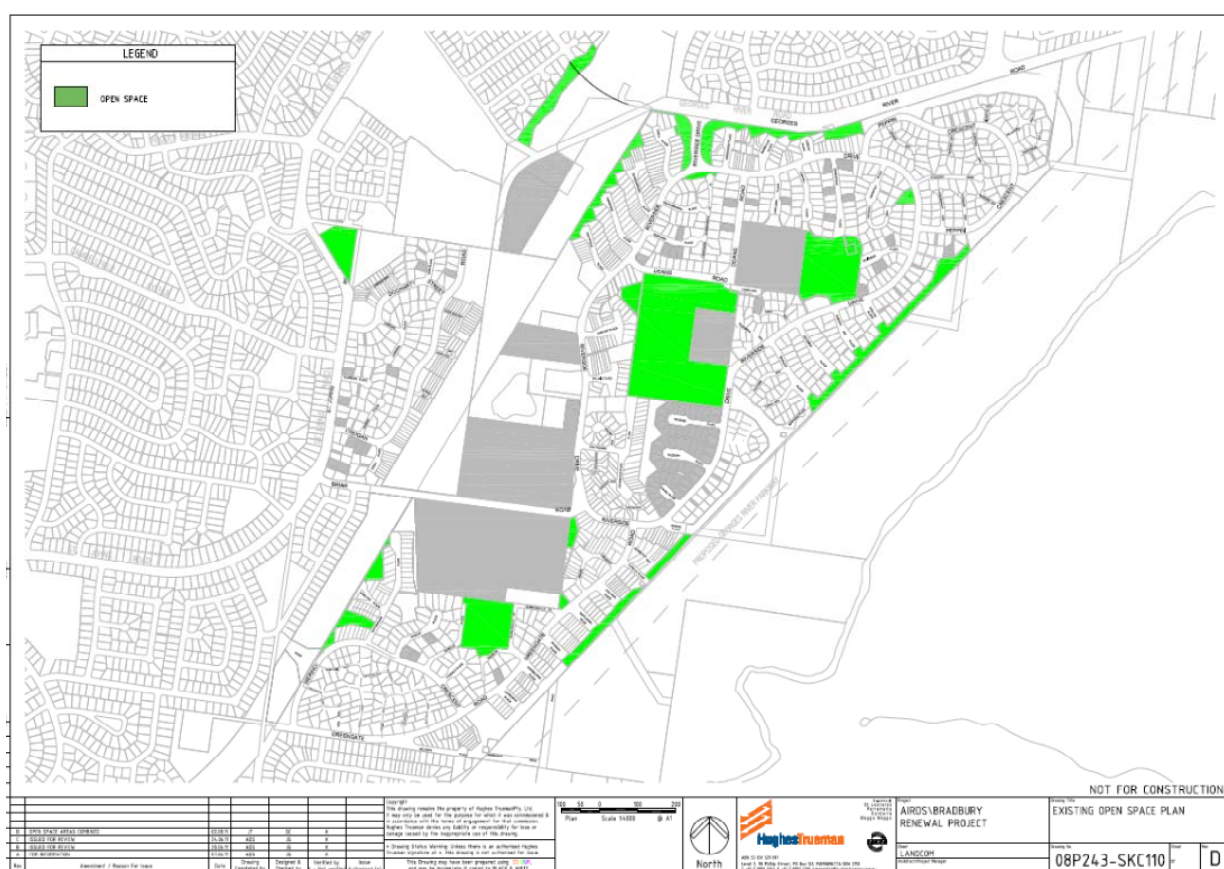
5.5 Provision and embellishment of open space

Airds-Bradbury contains approximately 21 reserves and parks totalling approximately 18 hectares of open space. There are five distinct parks including Deane Park, Riley Park, Kevin Wheatley VC Reserve, Baden Powell Reserve and Merino Reserve. A long corridor of public open space at the eastern extent of the study area abuts the unformed Georges River Parkway reservation which reinforces the bushland edge to the subject site. The Smiths Creek Corridor also acts as a major open space area on the western side, separating Airds and Bradbury. This area is predominantly used for informal pedestrian pathways.

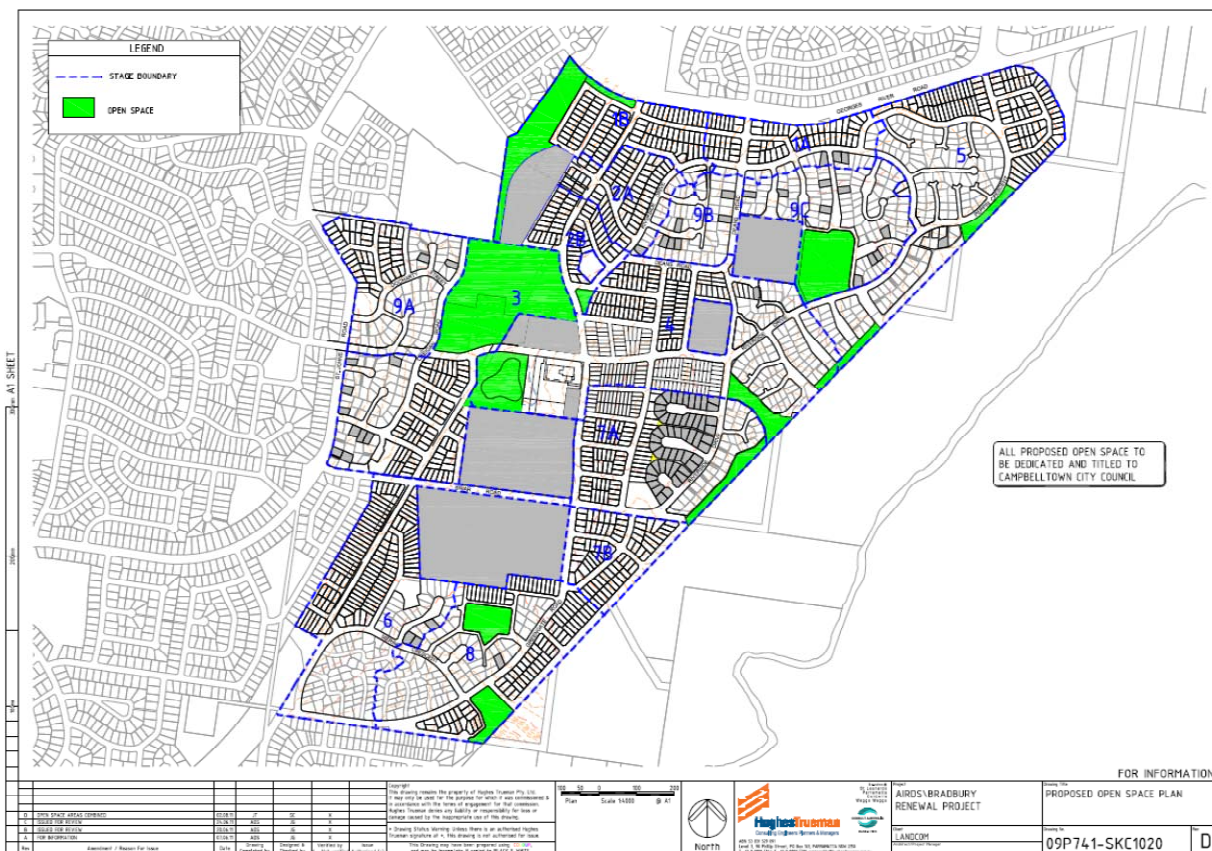
There is also a range of other smaller open spaces that act as neighbourhood parks or existing internalised open space networks that are legacies of the estate's Radburn design.

The range of existing open space areas are identified in figure 13 below

Figure 13: Existing Open Space



The proposed concept plan includes the redistribution and embellishment of the public open space networks across the site. The public open space to be provided includes a range of active and passive parks and bushland reserves resulting in a total area of approximately 18 hectares. Active and passive parks have been located so as to be generally within walking distance of residents. An important element of the public domain is the proposed inter-connective street system with its network of pathways and cycleways designed to augment the parks as a recreational resource and facilitate healthy living by encouraging walking and cycling. The reconfigured open space network responds to community needs, is safe and accessible and is linked to the pedestrian and cycle network and can be seen in Figure 14 below.

Figure 14: Proposed open space distribution

The issue in relation to open space has been the loss of Baden Powell Reserve. The original concept plan developed the majority of the existing public reserve for housing and this loss of existing open space land was the subject of submissions from the public. The proposal was unacceptable to Council and was reflected in the Council resolution of 13 December 2011 which supported the Concept plan with the exception of the development of Baden Powell Reserve. Since that time there have been ongoing discussions between Council and the proponent and an alternative development scenario has now been formulated to the satisfaction of both parties in indicative plans submitted in June. In summary it involves the retention of a significant portion of the existing Baden Powell Reserve, a corresponding reduction in the area of Merino Reserve and consequential changes to the proposed subdivision layout for both of these areas. A recommended modification to the concept plan requires a revised concept plan project layout reflecting these changes be submitted to the satisfaction of the Director General prior to any future application.

The concept plan will result in the removal of poorly performing open space areas and their replacement with a redistributed network of connected and well designed spaces with function and facilities which are more accessible and usable to the community. This results in a more efficient and safer use of land, more useable parks and a reduction in the on-going maintenance costs for Council. The level of embellishment, design and timing of delivery of public open space areas will be determined within the draft VPA to be finalised with NSW Land and Housing Corporation.

5.6 Development Contributions

Negotiations are well advanced between the proponent and the Council on the preparation of a Voluntary Planning Agreement (VPA) that will serve as the mechanism for the delivery of appropriate development contributions. In relation to future development consistent with the concept plan, no other s94 or s94A contributions will be payable. The VPA will set out the

design standard, value and delivery timing for a range of open space embellishments, infrastructure and community facilities and will need to be endorsed by both parties prior to approval of the Stage 1 Development Application.

5.7 Residential Amenity

One particular issue arising out of the public authority submissions should be noted.

As a result of the submission received from the Roads and Maritime Service (RMS) via the Sydney Regional Development Advisory Committee, a condition of consent is recommended to address the issue of potential noise impacts associated with the Georges River Parkway. The proponent has not agreed to the imposition of the condition.

The RMS submission made the point that the proponent needed to be aware of the existence of the Georges River Parkway reservation adjoining the subject site and the potential for noise to impact upon the proposed residential development that was in proximity to the road reservation. The RMS takes the position that the proponent is responsible for providing noise attenuation measures in accordance with the relevant environmental criteria in order to provide a satisfactory level of residential amenity for its development. In response, the proponent believes that as there are no plans for this road to be constructed, it would be the responsibility of the RMS to provide any required noise attenuation measures should the road ever be built.

There is no dispute that the relationship between residential development and a potential noise source, in the form of a main road, should be considered and addressed. In assessing this issue, weight should be given to the existence of the road reservation within Campbelltown (Urban Area) Local Environmental Plan 2002. Although there is currently no timetable for construction, it has been catered for in relevant planning instruments for many years. It is proposed that it will remain as part of the new city wide comprehensive LEP currently being prepared. It is reasonable that a proponent of any development of this scale consider the likely impacts that could arise. It would however be unreasonable to require the proponent to actually carry out works that may never be required. Therefore the proposed condition has been drafted to enable more detailed consideration of the issue at the time of lodgement of the various stages of development. The proponent has not agreed to the imposition of this requirement.

5.8 Indigenous and non indigenous heritage

Non indigenous heritage

There is one identified item of local heritage significance within the renewal area. It is known as 'Briar Cottage' and is listed within Campbelltown (Urban Area) Local Environmental Plan 2002. Briar Cottage was constructed in the early 1900's and was once the homestead for 'Dorchester Farm'. The farm included a large land holding covering much of present day Airds. Briar Cottage is a substantial Edwardian Tuck pointed design dwelling with a hipped Marseilles roof and terracotta roof ridging.

Briar cottage is currently owned by Campbelltown City Council and is on a long term lease to KU Children's Services for the purposes of operating a child care centre.

Although within the renewal area, Briar Cottage does not form part of the Concept Plan proposal. The Concept Plan proposes to replace the existing residential development that surrounds the cottage with new contemporary dwellings and any potential impacts upon the heritage item are considered to be insignificant. At the DA stage for subdivision and subsequent dwelling construction, further detailed consideration of the relationship of new residential development relative to the heritage values and fabric of the item will be considered.

Indigenous Heritage

An assessment of Aboriginal heritage has been undertaken by Jo McDonald Cultural Heritage Management on behalf of NSW Land and Housing Corporation. There are two locations where known relics are located, being an area at the south of the remnant bushland where playing fields are proposed (scattered relics – flakes) and in an area in the northeast of the bushland, which is proposed to be retained as bushland (scarred tree). The assessment included a site visit by the study team and Aboriginal representatives and found that the majority of the site is highly disturbed and has low to no archaeological significance except three areas that may contain archaeological deposits. OEH supports this finding.

Consideration of the Concept Plan reveals that there are two locations of potential conflict between high sensitivity areas and likely development impacts. They are an area to the south of the remnant bushland, where playing fields are proposed and an area to the northeast of the bushland where houses are proposed.

These two locations will require further negotiations between the Aboriginal community and NSW Land and Housing Corporation and an application of the strategic management approach to landscapes of archaeological sensitivity. OEH supported this approach.

Council's consideration of the issue has found that the playing fields are located mostly outside of the zone containing potential archaeological deposits with only a minor intrusion. Although this part of the site is identified as having a high level of archaeological significance, prior to works proceeding over this section it is recommended that the proponent be required to prepare and implement an Archaeological Management Plan. Included within this plan shall be various options to manage and mitigate impact. Burial and salvage should be considered and included as the most appropriate approaches for the site, with salvage as the last option.

The issues whilst needing to be further considered and addressed as part of Archaeological Management Plan, are not restrictive in that they would inhibit development proceeding within the nominated areas. The majority of the high archaeological significance area are outside of the development area and culturally the most significant artefact is the scarred tree which is not proposed to be affected as part of the development. Appropriate protection of Aboriginal cultural heritage will be achieved through the mitigation and protection measures to be included within an Archaeological Management Plan which forms part of the Statement of Commitments within the PPR and is required to be provided prior to development of the bushland area (proposed Stage 3) as part of the future assessment requirements.

5.9 Water cycle management

The development is located within an established urban area. Measures are proposed to manage stormwater quality and quantity during construction and operation as outlined in the Water Cycle Management Plan prepared by Storm Consulting. Adherence to the recommendations of this Plan form part of the Statement of Commitments included with the PPR.

The water cycle management strategy comprises a range of elements that work together to deliver an integrated outcome addressing each of the following:

- stormwater quality improvement,
- flooding and detention,
- potable water substitution, and
- environmental restoration/rehabilitation.

There will be a number of water quality improvements, such as pollutant traps, water sensitive urban design, ponds and other measures that result in improved stormwater treatment and management on the site.

A number of options for stormwater detention have been investigated, with the proponent preferring the option of detention in the Smiths Creek corridor. Stormwater will be detained upstream of Georges River Road with the construction of a low wall to detain the 1 in 100 year flow and by modifying the existing culvert.

In respect to flooding, the Storm Consulting report advises that post development, a small flood wall 300mm high will also be required on the boundary of one of the lower lying lots to ensure that there will not be any flooding of surrounding lots in the 1 in 100 year ARI event.

The drainage measures proposed in the Concept Plan will ensure that appropriate arrangements can be put in place to manage the quantity and quality of stormwater flows in a manner that has no adverse impacts on flooding of adjoining lands or the catchment. In terms of flooding there are two options proposed to retain the 1% flood (or 1 in 100 yr) event. These principally relate to storage within Smiths Creek Corridor or within the proposed playing fields adjacent to the proposed east-west link road.

Further detailed assessment and design of water cycle management measures will be addressed as part of each stage of the subdivision. This assessment will require drainage corridors for the development to be designed to convey flows for the 100 year ARI storm event.

5.10 Bushfire risk

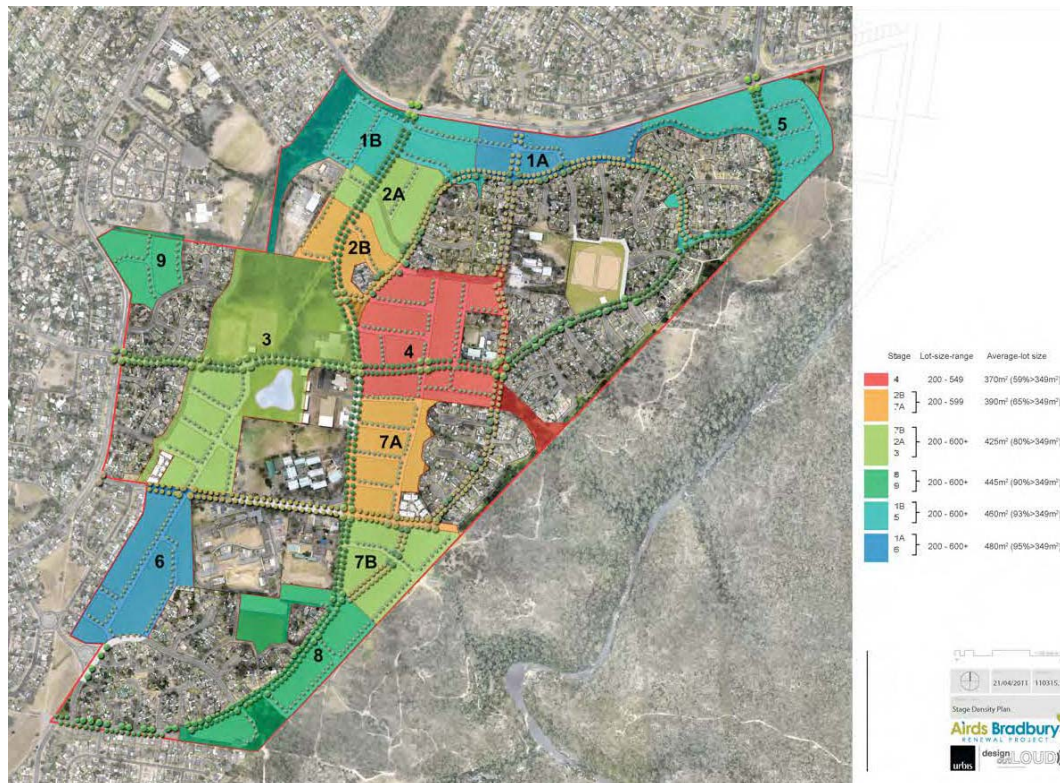
Bushfire Planning Assessments were prepared by Hayes Environmental that considered the Concept Plan application. The assessment considers the relevant requirements of Planning for Bushfire Protection 2006 (PBP 2006).

The assessment of bushfire protection for the Airds Bradbury Renewal Project concluded that the study area is suitable and capable to be developed as proposed in the Concept Plan. The main threat or bushfire risk stems from land within the adjacent Georges River Parkway Reserve. This presents a serious threat to the study area and this bushland development interface will require an Asset Protection Zone (APZ) to comply with PBP and the recommended APZ's would range from 25 m to 35 m for residential development. Furthermore the retention of the Smiths Creek bushland and riparian corridor may create a bushfire hazard that will also require an APZ ranging in width from 10 m to 15 m for residential development. The required APZ's can be accommodated and full details of these will be provided as supporting information with Development Applications for various stages of development.

The Hayes Environmental report adequately deals with and considers bushfire risk within the project area. The concept plan was also referred to the NSW Rural Bushfire Service who did not raise any objection to the development, subject to compliance with PBP. Further detailed assessment and referral to the NSW Rural Fire Service will occur for each of the subsequent Development Applications for the various stages of development, including the ability of any proposed seniors living sites to comply with the requirements of PBP for this type of land use.

5.11 Subdivision

The concept plan does not seek specific approvals for subdivision. The proponent has provided an indicative subdivision pattern for the site, with lots generally to be in the order of 300 sq m to 500 sq m, with greater densities expected to be achieved within and surrounding the town centre precinct, with lots down to 200 sq m. The lots sizes are illustrated in Figure 15 below:

Figure 15: Indicative lot sizes

The creation of new allotments will be the subject of future Development Applications for subdivision at each proposed stage. The subdivision will also be informed by the provisions contained within the Development Control Guidelines that are proposed to form part of the concept plan approval as well as the provisions of the State Housing Code.

5.12 Geotechnical and contamination

Geotechnical investigations included in the EA reveal the site to be generally underlain by thin topsoil/fill and fill overlying residual clays overlying bedrock. The upper bedrock unit is comprised of Ashfield Shale and the lower bedrock unit comprises of Hawkesbury Sandstone. The laboratory test results indicate the natural clay to be plastic and moderately reactive and non to slightly saline with localised moderately saline soil at lower depths. Soil salinity is not considered significant within the site. Acid sulphate soil was not encountered in the investigations and is not considered to impact on the proposed redevelopment of the site.

A preliminary contamination investigation was conducted in accordance with relevant NSW Office of Environment and Heritage guidelines. The site area was used for farming from the early 1800s to the 1970s, with an occasional residence or commercial property. In the 1970s, much of the area was subdivided into a housing estate, with a number of schools established. In the 1980s, residential development continued, as did the development of the commercial area within Airds.

Based on the site history and site inspection, some areas of environmental concern with associated contaminants were identified in the contamination report and will be the subject of further assessment and potential remediation. The service station on Riverside Drive, the bus depot and substation adjacent to the western site boundary are considered to be potential offsite sources of contamination. Based on the likely presence of petroleum storage in aboveground or underground tanks at the service station and depot and of potential PCBs in transformers and capacitors at the substation, these facilities have the potential to impact the site predominantly via migration of potentially contaminated groundwater.

The investigation has identified that the main contamination issue at the site is asbestos, which is present as fragments of ACM on the ground surface and in fill materials. The extent of asbestos impact at the site will require to be assessed through a detailed site investigation process, and appropriate remediation/ management plans developed to outline the steps required to make the site suitable for the proposed development.

Council considers that the geotechnical and contamination assessment is appropriate at this stage, however any approval of the Concept plan should be subject to each subsequent stage of development having a more detailed contamination assessment carried out in accordance with the requirements of State Environmental Planning Policy No. 55 – Remediation of Land. This commitment is not included within the proponent's Statement of Commitments and therefore is included as a future assessment requirement.

5.13 Utilities

As described in the Infrastructure Report prepared by Mott MacDonald on behalf of the proponent, all utility services are available or can be readily extended to meet the requirements of the proposed development. Provision has been made for placing high voltage transmission lines along the Smiths Creek bypass corridor underground and for protecting large water mains in this area. Discussions have been held with all relevant servicing authorities and will continue during the preparation of subsequent Development Applications.

The Council considers that appropriate utility infrastructure can be provided for the development. Details of infrastructure servicing for each stage will be finalised through each subsequent Development Application that seeks to create new allotments.

Furthermore, Endeavour Energy has confirmed that the Kentlyn zone substation can accommodate the proposed increase in dwelling yield. Endeavour Energy has previously undertaken acoustic investigations of the substation and is in discussions with the proponent to ensure that acceptable residential noise criteria are satisfied. An appropriate future assessment requirement is recommended in relation to assessing noise impacts from the substation.

The proponent seeks approval for carrying out of this stage of the project and requests that no further environmental assessment of this stage be required.

5.14 Demolition

The Concept Plan envisages the staged demolition of some existing dwellings, primarily within the town house precincts on the site. Demolition will be in accordance with the requirements of AS2601- 2001. Demolition will include the removal of all improvements, breaking down and removing all foundations and footings, breaking up and removing road pavements, footpaths and services not required and removal of all debris and rubbish. A Hazardous Building Materials Management Plan will be prepared prior to any demolition commencing, as will an erosion and sediment control plan. A Site management Plan will cover issues as diverse as pedestrian and vehicular access, noise and dust mitigation, community information and procedures for registering complaints.

Importantly, residents will be progressively rehoused as demolition proceeds and NSW Land and housing Corporation has established a rehousing team to assist tenants through this process.

The Statement of Commitments contained within the final Response to Submissions and Preferred Project Report reiterate all of the above

6. CONCLUSION

The proposal demonstrates a high level of consistency with prevailing government policy and planning instruments including State and Regional Environmental Plans.

An assessment of environmental impacts of the proposal concludes that the project represents an appropriate environmental outcome that can be fully implemented through a process of further approvals for subdivision and construction works associated with each stage of development.

The new urban structure, with an east-west link road, provides social and economic benefits to the town centre, but importantly provides increased connectivity within the estate and adjoining areas. Whilst there will be the temporary displacement of existing tenants, this is an inevitable component of the government's mandate to provide a greater mix within the housing estate, with a resultant 70% private and 30% public dwellings. Significant positive social impacts will arise from the provision of a range of housing opportunities in a more connective and accessible residential environment, as well as new and embellished community facilities.

The development of the Airds Bradbury estate in the 1970's, which was based on the poorly conceived Radburn principles, has proven unsuccessful due to its internalised open space, poor connecting streets and lack safety. Given the age of the public housing estate and its poorly performing planning strategy, the estate is well placed for and in critical need of, redevelopment.

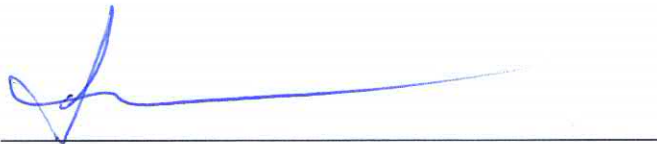
Whilst there will be some loss of existing threatened ecological communities, such as SSTF and CPW, this will be off-set with the establishment of SSTF within the adjoining Georges River Corridor with more revegetated SSTF than that lost. The majority of the CPW will be retained and rehabilitated and maintained in perpetuity as part of the concept plan and Voluntary Planning Agreement to be finalised with Council. Water sensitive urban design will combine stormwater detention and treatment with open space and recreation opportunities.

The assessment has concluded that the site is suitable for the proposal and that the implementation of the Airds Bradbury Renewal Project is consistent with the greater public interest. All of the proposed modifications to the concept plan, conditions of approval and future assessment requirements have been agreed to with the proponent with the exception of further noise assessments for stages of development in proximity to the proposed Georges River Parkway. Consequently, approval is recommended.

7. RECOMMENDATION

It is recommended that the Deputy Director-General:

- a) **Consider** the findings and recommendations of this report;
- b) **Approve** the Concept Plan Application (MP 10_0186), subject to modifications, under Section 75O(1) of the EP&A Act, having considered all relevant matters in accordance with (a) above;
- c) **Determine** that approval to carry out the project, except demolition works as described in Schedule 6 of the instrument at Appendix F, is to be subject to Part 4 of the EP&A Act under Section 75P(1)(b);
- d) **Approve** demolition works as described in Schedule 6 of the instrument at Appendix 5, subject to conditions under section 75P(1)(c) of the EP&A Act;
- e) **Specify** that under Section 75P(2)(c) the future environmental assessment requirements for the project, except demolition works as described in Schedule 6 of the instrument at Appendix F, under Part 4 of the EP&A Act are as identified in Schedule 4 of the instrument at Appendix F; and
- f) **Sign** the attached Instrument of Approval (Appendix F).



Jeff Lawrence
Director Planning and Environment
Campbelltown City Council

APPENDIX A ENVIRONMENTAL ASSESSMENT

See the Department's website at <http://majorprojects.planning.nsw.gov.au>

APPENDIX B SUBMISSIONS

See the Department's website at <http://majorprojects.planning.nsw.gov.au>

APPENDIX C PROPONENT'S RESPONSE TO SUBMISSIONS

See the Department's website at <http://majorprojects.planning.nsw.gov.au>

APPENDIX D CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS IDENTIFIED BY THE ISSUED DG'S REQUIREMENTS

State Environmental Planning Policy (Major Development) 2005	
State Environmental Planning Policy (Major Development) 2005 (MD SEPP) outlines the types of development declared a major project for the purposes of Part 3A of the EP&A Act. For the purposes of the SEPP certain forms of development may be considered a major project if the Minister (or his delegate) forms the opinion that the development meets criteria within the SEPP.	<p>State Environmental Planning Policy (Major Development) 2005 outlines the types of development declared a 'Major Project' for the purposes of Part 3A of the <i>Environmental Planning and Assessment Act (EP&A Act)</i>. For the purposes of the MDSEPP certain forms of development may be considered a major project if the Minister for Planning and Infrastructure (or his delegate) forms the opinion that the development meets the criteria within the MDSEPP.</p> <p>The Minister declared that the proposal was a major project under Part 3A of the EP&A Act because it is development for the purpose of residential commercial or retail development with a construction investment value of more than \$100m, pursuant to Clause 13, Schedule 1 of the Major Development SEPP. The Minister also authorised the submission of a concept plan.</p>
State Environmental Planning Policy No. 55 – Remediation of Land	
SEPP 55 promotes the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. The policy states that land must not be developed if it is unsuitable for a proposed use because it is contaminated.	<p>SEPP 55 promotes the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. The Policy states that land must not be developed if it is unsuitable for a proposed use because it is contaminated.</p> <p>The environmental assessment contains a preliminary investigation on soil contamination on the site. The report found limited traces of contamination within the site area and where present the affected areas are able to be effectively remediated as part of the construction process. Further detailed assessment of contamination will be undertaken at the development application stage for subdivision works, with any remediation works to be supervised and tested by an appropriately qualified site auditor.</p>

SEPP 44 – Koala Habitat	
SEPP 44 aims to encourage the proper conservation and management of areas of natural vegetation that provide habitat for koalas to ensure a permanent free-living population over their present range and reverse the current trend of koala population decline. SEPP 44 applies to the site as it is located in a local government area listed in Schedule 1. The supplementary ecological assessment provided in the PPR considers SEPP 44, but goes wider due to additional species that are considered potential habitat for koalas.	<p>SEPP 44 aims to encourage the proper conservation and management of areas of natural vegetation that provide habitat for koalas to ensure a permanent free-living population over their present range and reverse the current trend of koala population decline. SEPP 44 applies to the site as it is located in a local government area listed in Schedule 1 of the SEPP. The supplementary ecological assessment in the Preferred Planning Report considers the relevant sections of SEPP 44 and considers in further detail likely ecological communities that are considered potential habitat for koalas.</p> <p>The ecological assessment provided in the Environmental Assessment report finds that some patches of vegetation within the subject site contain Koala 'feed tree species' and are likely to constitute 'potential koala habitat' under SEPP 44. However, the site is not considered to represent a 'Core Koala Habitat' and therefore development can proceed without the need for a plan of management under the provisions of SEPP 44.</p>
State Environmental Planning Policy No.65 (Design Quality of Residential Flat Development)	
The SEPP aims to raise the quality of residential flat development across the state through the application of a consistent set of design principles. A qualified designer is required to be involved in certain projects and oversight by a Design Review Panel has been established as part of the assessment process. The SEPP relates to development for the purpose of residential flat buildings, which are defined under the SEPP.	Although the SEPP was required to be considered by the DG's Requirements for the EA, it is not considered to be relevant to the Airds Bradbury Urban Renewal Concept plan. The proposed residential development under the concept plan would not fall within the definition of residential flat buildings.
State Environmental Planning Policy (Infrastructure) 2007	
The Infrastructure SEPP provides for the effective delivery of infrastructure across the State, including special provisions for development by or on behalf of public authorities. Such infrastructure types include educational establishments, housing (including special provisions for public housing), roads and stormwater management. It sets our requirements for referrals for 'traffic generating development, and for	The proposal is considered to be 'traffic generating development' for the purposes of the SEPP and as such the proposal was referred to the RTA. The proposal was also referred to Transport NSW. Both the RTA and Transport NSW raised no objection to the development, subject to certain matters, such as bus and pedestrian network being adequately provided which is further detailed in section 5 of this report and Appendix E – Response to State Agency submissions. There

development adjacent to the south west rail link corridor. The SEPP also sets out requirements for noise impacts adjacent to busy roads and rail corridors.	are no other elements of the proposal that would be in conflict with the Infrastructure SEPP.
Greater Metropolitan Regional Environmental Plan No 2—Georges River Catchment	
The REP applies to the Georges River Catchment and sets out planning principles to be considered in consideration of rezoning and development applications. Relevant principles relate to acid sulphate soils, bank disturbances, flooding, urban stormwater, vegetated buffer areas, water quality.	The proposal includes appropriate water sensitive urban design infrastructure, management of flood hazard, and protection of riparian corridors which will ensure consistency with the principles of the REP.
State Environmental Planning Policy (Affordable Rental Housing) 2009	
State Environmental Planning Policy (Affordable Rental Housing) 2009 promotes the development of new affordable rental housing in New South Wales by providing development and design controls that assist with the delivery of housing stock for low and low-middle income earners and homeless and other disadvantaged people who may require support services, including group homes and public housing provision.	The Concept Plan is consistent with the provisions of this policy with elements of the development permissible with or without consent under this policy. Such development that may be carried out without consent by Land and Housing Corporation prescribed by clause 40 of the SEPP include the construction of up to 20 dwellings 8.5m high on one allotment and the demolition of existing dwellings.

APPENDIX E RECOMMENDED CONCEPT APPROVAL

See Concept Approval attached separately to this document.