

Western Sydney Parklands Bungarribee Precinct – State Significant Study and Environmental Assessment Report

Summary of issues raised by key stakeholders

PART A – COMMUNITY SUBMISSIONS

No.	Date	Submitter	Nature	Comment	Issue Summary	Landcom Response
1	10 Jan 08	Member of the public	Object	1. Destruction of heritage and natural environment.	<ul style="list-style-type: none"> Heritage Natural environment 	<p>1. The Bungarribee Homestead curtilage covers an area of approximately 3.39 hectares. The curtilage has been identified in consultation with the NSW Heritage Office and is considered appropriate for the nature of the footings that remain on the site. Further archaeological investigations have also been commissioned to confirm any additional significant relics, and if unveiled, appropriate archiving and / or mitigation measures will be implemented.</p> <p>Section 7.3 and the Flora and Fauna Assessment at Appendix A (Vol 2) of the EA consider the value of vegetation proposed to be removed. The loss of high conservation value vegetation is acknowledged and will be adequately offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, as they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Vision.</p> <p>Ecological investigations of the Cumberland Plain Land Snail and Microbats have been, and continue to be, undertaken to provide mitigation measures.</p>
2	21 Jan 08	Member of the public	Object	<ol style="list-style-type: none"> Residential development on the site will preclude it being used for open space. Future road adjacent to his property. As a State Significant Site it should be left alone. 	<ul style="list-style-type: none"> Reduction in open space Traffic impacts State Significant Site should be left alone 	<ol style="list-style-type: none"> The concept plan provides for approx 4.6 hectares of local open space within the residential precinct in addition to 300 hectares of Regional Parklands. Section 7.1.4, Appendix A – Concept Plans and Appendix B – Development Design Code indicate the location and function of open space throughout the Doonside Residential parcel. The road layout has been designed having regard to strengths and weaknesses of the existing road network, strategic transport matters, and good urban design practice. The proposed road layout promotes good circulation and permeability throughout the precinct, and to the adjacent neighbourhood and the Parklands. The Minister for Planning has agreed to consider the site as potential State significant site on the basis of the site's strategic and regional context and conservation outcomes.
3	24 Jan 08	Member of the public	Object	<ol style="list-style-type: none"> Loss of greenbelt, recreation and environmental area. Residential subdivision will provide revenue to provide recreation resources elsewhere. Concept plan does not justify the destruction of pristine rare and historic bushland. Creation of 700-730 lots will generate the development of even more dwellings – the number of dwellings generated could be as high as 1000 taking into account re-subdivision. Zoning would allow low-rise and medium density development. The need for a new residential community is not explained or justified in the Plan. The Plan allows residential development in close proximity to Bungarribee Homestead allowing only one significant vista to the south. The Concept plan does not satisfy the aims of SREP 31. The Concept Plan does not recognise the significance of the Bungarribee Site which is of State Significance and on the State Heritage Register. Residential development will be allowed right up to the drip line of historic pine trees. Concept Plan fails to justify the reason for locating residential development adjacent to Bungarribee footprint. Proximity of residential development will have a negative impact on the heritage area due to use of the site by children. Cyclists, trail bike riders, walkers and trampling of vegetation and archaeological remains. 	<ul style="list-style-type: none"> Natural environment Location of recreation resources Design Views Legislation – SREP31 Heritage Heritage Consultation Loss of parklands 	<ol style="list-style-type: none"> The residential components of the concept plan will facilitate the improvement and enhancement of the Regional Parklands. Revenue from the residential development is proposed to be reinvested into the Parklands. Further, the draft VPA clearly provides for local and regional infrastructure to be provided on the site or within the immediate area. Section 7.3 and the Flora and Fauna Assessment at Appendix A (Vol 2) of the EA consider the value of vegetation proposed to be removed. The loss of high conservation value vegetation is acknowledged and will be adequately offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, as they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Vision. The Concept Plan seeks approval for a maximum of 730 residential allotments only. The proposed zoning has been revised to R3 Medium Density Residential in response to Blacktown City Council's recommendation. Section 5.3 articulates the justification for residential development on the site. To achieve the transformation of the Parklands from a land acquisition program to a much-needed social setting for the people of Western Sydney, the Department of Planning identified portions of land adjacent to the Parklands with development potential to help fund the implementation of the Parklands. The development of the Parklands is to be guided by the Western Sydney Regional Parklands Management Vision and Concept Options (URS2004). The Development Design Code's provisions for residential development in the

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				<p>14. The Concept Plan does not retain the visual integrity of the Bungarribee Homestead.</p> <p>15. The only views retained are those through the South West.</p> <p>16. Visual integrity will be lost once housing development commences.</p> <p>17. The provision of 'eco-medians' will not provide vistas, rather visual passage ways between houses.</p> <p>18. No mention is made of local heritage organisations on pg 60, no mention of Mt Druitt Historical Society, Blacktown and District Historical society, Prospect Trust.</p> <p>19. On what basis did the Department of Planning assess that the Doonside Residential Precinct was not required for parkland purposes.</p> <p>20. The Doonside Residential Housing Precinct contradicts objective on pg 39.</p> <p>21. The scale of the residential development is inappropriate and the area between the North Creek and Bungarribee Creek be set aside for preservation as a heritage area.</p> <p>22. The Concept plan does not recognise the early colonial and European History, associated links with India, convict and military past.</p> <p>23. Heritage investigations to date have been inadequate.</p> <p>24. A full archaeological study of the farmstead is required, previous study did not cover the barn, convict tunnel, convict military barracks and other ancillary buildings.</p> <p>25. The Plan is not 'World's Best Practice'.</p>		<p>vicinity of the Bungarribee House site responds to the heritage values of the site by recognising its prominent location on top of the hill, and vistas along view corridors. The subdivision plan is a direct response to the protection of significant heritage views, and the proposed curtilage is considered appropriate for the footings that remain. The Development Design Code seeks to ensure a cohesive and visually pleasing residential precinct which acknowledges the historic uses on the site and the remaining footings.</p> <p>8. The Concept Plan satisfies the SREP 31 objectives as outlined in Section 5.3.2 and Appendix F of the EA by:</p> <ul style="list-style-type: none"> i. Promoting consistent planning and management of the Regional Parklands through the SSS proposal ii. strengthening the perception of the Regional Parklands through investment generated from the Doonside Residential Precinct and thereby conserving the recognised significant vegetation on the site; iii. enhancing the ability of the Regional Parklands to meet the needs of the residents of Sydney for high quality open space, a range of recreational opportunities, and a visual and physical break between areas of urban development, and iv. maintaining, enhancing and rehabilitating the natural systems of the Regional Parklands, particularly those that include threatened species, populations or ecological communities, or their habitats. <p>9. The State heritage significance of the site has been acknowledged in the proposed curtilage of Bungarribee Homestead. The Parklands include interpretive elements to recognise past activities that have been undertaken on the site. A commitment has also been made to prepare a Site Interpretation Strategy.</p> <p>10. Future applications will confirm that development is not proposed within the drip lines of trees.</p> <p>11. Distances between heritage elements and new residences and/or infrastructure such as roads have been carefully assessed taking into account heritage, urban design and visual amenity issues. The resulting offsets are considered reasonable.</p> <p>12. Residential development is proposed in the specified location on the basis that that land is not required for Parklands purposes. The location of the proposed residential lands are considered appropriate having regard to existing surrounding urban development, proximity to Doonside Railway Station and the relatively flat nature of the land.</p> <p>Integrating the heritage components into the urban footprint celebrates the significance of the Bungarribee Homestead precinct and could potentially be an educational element for children and the general community.</p> <p>13. Clearly defined pedestrian and cyclist networks are proposed to ensure significant vegetation, and heritage and archaeological remnants are protected.</p> <p>14. The subdivision plan is a direct response to the protection of significant heritage views. The proposed curtilage is considered appropriate for the footings that remain. The Development Design Code seeks to ensure a cohesive and visually pleasing residential precinct which acknowledges the historic uses on the site and remaining footings.</p> <p>15. See response to 14 above.</p> <p>16. See response to 14 above.</p> <p>17. The eco medians are mainly intended for stormwater treatment, bio-filtration and detention functions. The street layout and proposed curtilage around the Bungarribee Homestead provide appropriate views and vistas.</p> <p>18. Organisations that were consulted during preparation of the EA are listed on page 60 of the report. Whilst the local heritage organisations were not consulted at that time, it is understood that they have now been consulted and their concerns are now known through submissions received and considered during the assessment process. Refer to responses to submissions that follow.</p> <p>19. The decision to release the Doonside Residential Precinct for development was based on a review by the Department of Planning of the lands that had been acquired over time. In order to achieve the transformation of the Parklands from a land acquisition program to a much-needed social setting for the people of Western Sydney, the Department of Planning identified portions of land</p>

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						<p>adjacent to the Parklands with development potential to help fund the implementation of the Parklands. The process is being guided by the Western Sydney Regional Parklands Management Vision and Concept Options (URS2004).</p> <p>20. The comments regarding objectives on page 39 are not understood. However, the Concept Plan proposal has been designed to recognise Bungarribee Homestead and further archaeological investigations are being undertaken in areas of high archaeological significance. This would suggest that the aims referred to on page 39 will be satisfied.</p> <p>21. The residential development is based in part on achieving Metropolitan Strategy dwelling targets. The impacts of the proposed development in the vegetation areas north of the site have been investigated, quantified and recognised in the EA. The investigations have determined that there will be no significant impacts. Furthermore measures such as vegetation offsets will be undertaken to mitigate impacts and achieve greater environmental outcomes.</p> <p>22. Sections 7.1.5, 7.4 and Appendix D comprehensively address the heritage issues associated with site. The recommendations within the Conservation Management Plan have been incorporated into the proposal's design and reinforced through the statement of commitments. The heritage issues are considered to have been adequately addressed.</p> <p>23. See response to (9) above.</p> <p>24. Further archaeological investigations are being undertaken in areas of high archaeological significance.</p> <p>25. Landcom believes that the proposal exhibits world's best practice insofar as sustainability initiatives are proposed as outlined in Section 4.2 of the EA.</p>
4	4 Feb 08	Prospect Heritage Trust Po Box 257 DOONSIDE NSW, 2767	Object	<ol style="list-style-type: none"> 1. The proposal does not comply with statutory requirements and recommended practice. 2. The provisions of the Burra Charter as amended by the Australian ICOMOS have been ignored 3. Proper archaeological excavations have not taken place and an authoritative report not published 	<ul style="list-style-type: none"> • Heritage • Compliance with Burra Charter 	<ol style="list-style-type: none"> 1. Sections 7.1.5, 7.4 and Appendix D comprehensively address the heritage issues associated with site. The recommendations within the Conservation Management Plan prepared for the site have been incorporated into the proposal's design and reinforced through the statement of commitments. The heritage issues are considered to have been adequately addressed. 2. Appendix D adequately addresses and considers the Burra Charter. 3. Further archaeological investigations are being undertaken in areas of high archaeological significance.
6	6 Feb 2008	Blacktown and District Historical Society 15 Browning Place SEVEN HILLS NSW 2147	Object	<ol style="list-style-type: none"> 1. The Doonside residential parcel is located on a heritage site and impinges on the precious position of the former colonial house Bungarribee and its attendant buildings. 2. There are little heritage buildings left in the Blacktown area, we need to preserve what once existed on the site. 3. The Burra Charter sets out the importance of place and its significance as very important and of prime consideration before any development takes place 4. The Bungarribee House site is a reminder of events which took place there over the Colonial period and after and has cultural significance for the Doonside Blacktown area and by being developed now reduces our ability to feel anything that connects us to past usages (Article 1.2) 5. 'The value of the place as a complex and genuine entity should be upheld to encourage the retention of layers of complexity which are easily lost during radical change'. (Burra Charter p.13 - do as much as possible as little as possible). 6. The location and setting of the Bungarribee House and support buildings is of importance for Western Sydney. 7. A study of place which was the homestead and its associated buildings should be undertaken before any excavation or work begins on the projected subdivision. 8. Burra article 24 'it is essential that a detailed archaeological investigation of this farmstead site be undertaken before any disturbance of the ground site occurs'. 9. It is of paramount importance to investigate where significant buildings once stood to show what lies under the ground and to ensure according to Conservation Guidelines 2.6 of the Burra Charter that the conditions of the 	<ul style="list-style-type: none"> • Heritage • Burra Charter • Natural environment • Heritage consultation 	<ol style="list-style-type: none"> 1. Sections 7.1.5, 7.4 and Appendix D comprehensively address the heritage issues associated with site. The recommendations within the Conservation Management Plan prepared for the site have been incorporated into the proposal's design and reinforced through the statement of commitments. The heritage issues are considered to have been adequately addressed. 2. Noted and agreed. The Concept Plan recognises and protects the importance of the Bungarribee Homestead. 3. Noted. Appendix D adequately addresses and considers the Burra Charter. 4. The proposal recognises the need to maintain and celebrate the past uses of the site and its heritage significance. A commitment has been made to prepare a Site Interpretation Strategy. 5. Noted. 6. See response to (1) above. 7. See response to (1) above 8. Noted. 9. See response to (1) above. Further archaeological investigations are being undertaken in areas of high archaeological significance. 10. Noted. See responses to (1) and (9) above. 11. The proposed Development Design Code (Volume 1, Appendix B) sets out the design controls for the development of the residential parcel including guidelines to ensure a positive visual, environmental and management relationship with the adjoining areas, and the provision of a high quality innovative and integrated residential area particularly in terms of built form and landscaping (see section 5 Housing: built from controls). Additionally, the creation of a Design Review Panel has been proposed to assess future development proposal and ensure they are consistent with the DDC. The

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				<p>Burra Charter are adhered to if Interpretation Guideline 2.4 of Conservation Policy is proposed, that this is appropriately understood and carried out.</p> <p>10. The area of new housing lots should be cut down by eliminating housing in the triangular shaped block immediately adjacent to the Bunagrabee House area and returning it to the house curtilage thus lessening the damage to Bunagarabee House Footprint'.</p> <p>11. The Report overview fails to mention the design of the houses. What is the expected housing type here and has a study been made of the impact on the geology and biology of the Doonside site.</p> <p>12. The proposal will result in a loss of nature contradicting the inspiration for the Western Sydney Parklands.</p> <p>13. Botany of the site, residual flowers native to the area will be lost.</p> <p>14. If some of the development were allowed to rejuvenate itself naturally, then the land could once again be clothed in native flora.</p> <p>15. There has not been any dialogue with local historical or heritage bodies to determine what the community thinks of the proposal.</p> <p>16. Blacktown is at risk of landscape and bushland loss.</p> <p>17. State Government is determined to turn every piece of land especially in Western Sydney into dollars without regard to the beauty or well being of the land or the people of the west.</p> <p>18. People chose to live in the west to escape from too close settlement and high rise development and now they are being hemmed in on all sides by that very type of settlement.</p> <p>19. Rethink and redesign that part of the Doonside Residential Precinct on its border with the Bunagarabee Homestead complex so that the footprint of the house and its outbuildings is not damaged but protected.</p> <p>20. Unless the appropriate conditions of the Burra Charter and Heritage Act are acted upon then the law is being broken.</p>		<p>Design Review Panel will include representatives from the Department of Planning, Council and the developer.</p> <p>12. Section 7.3 and the Flora and Fauna Assessment at Appendix A (Vol 2) of the EA consider the value of vegetation proposed to be removed. The loss of high conservation value vegetation is acknowledged and will be adequately offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, as they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Vision. Ecological investigations of the Cumberland Plain Land Snail and Microbats have been, and continue to be, undertaken to provide mitigation measures.</p> <p>13. See response to (1) above.</p> <p>14. See response to (12) above.</p> <p>15. Local historians and NSW Heritage were consulted during preparation of the Concept Plan. The public was invited to attend a public exhibition of the CMP (which was also advertised in locally circulating newspapers) held at Blacktown Olympic Park on 21 October 2006. Landcom also understands that additional community organisations were consulted during public exhibition of the proposal and their concerns are now known through submissions received. Landcom has considered these issues during the assessment process as evidenced by the preferred project report.</p> <p>16. See response to (12) above.</p> <p>17. Residential development is proposed in the specified location on the basis that that land is not required for Parklands purposes. The location of the proposed residential lands are considered appropriate having regard to existing surrounding urban development, proximity to Doonside Railway Station and the relatively flat nature of the land. Furthermore, Section 5.3 articulates the justification for residential development on the site. The Doonside Residential Precinct will assist in meeting residential targets set by the Metropolitan Strategy, North West Subregional Strategy and the funding of the Western Sydney Parklands.</p> <p>18. See response to (12) above.</p> <p>19. The subdivision plan is a direct response to the protection of significant heritage views. The proposed curtilage is considered appropriate for the footings that remain. The Development Design Code seeks to ensure a cohesive and visually pleasing residential precinct which acknowledges the historic uses on the site and remaining footings.</p> <p>20. Sections 7.1.5, 7.4 and Appendix D comprehensively address the heritage issues associated with site. The recommendations within the Conservation Management Plan prepared for the site have been incorporated into the proposal's design and reinforced through the statement of commitments. The heritage issues are considered to have been adequately addressed. Appendix D adequately addresses and considers the Burra Charter.</p>
7		Blacktown Greens	object	<p>1. Sydney does not have the infrastructure to support a population influx.</p> <p>2. More emphasis needs to be put on public transport rather than private vehicle.</p> <p>3. We need more libraries, hospitals and community halls.</p> <p>4. No more houses should be built anywhere in Sydney until it is law for every house to have not only a water tank but solar electricity and solar hot water.</p> <p>5. All new housing estates should have at least 20% of houses affordable for low and moderate income earners (no more than 20% of income per week over 15 yrs).</p> <p>6. Blacktown has one of the highest rates of repossession in NSW it is important that houses are affordable.</p> <p>7. Market gardens and solar street lights should be mandatory along with grey water use and stormwater harvesting.</p> <p>8. Follow up of surveys and specified flora and fauna don't appear to have been done as promised or are not readily available.</p> <p>9. All remnants of woodland were originally to be conserved which included</p>	<ul style="list-style-type: none"> • Increase in population • Transport • Community facilities • Affordable housing • Natural environment • Energy efficiency 	<p>1. The proposed VPA (Appendix E) seeks to address the provision of local and regional infrastructure. The required infrastructure provisions and upgrades to service the proposed development have been investigated and will be delivered in coordination with the local authorities and service providers.</p> <p>2. Section 7.2.9 and Appendix B consider public transport usage. The Concept Plan promotes reduced reliance on private vehicle usage by:</p> <ol style="list-style-type: none"> locating dwellings within close proximity to Doonside Railway Station; locating development on existing bus routes; designing roads which can accommodate bus services; and providing good quality pedestrian and cyclist facilities. <p>3. The social sustainability report indicates that provision of social infrastructure in the area is adequate.</p> <p>4. BASIX which promotes reduced water and energy consumption, will apply to the construction of the future dwellings.</p> <p>5. Affordable housing will be provided consistent with Landcom's Affordable Housing Policy and State Government policy.</p> <p>Further to this, the proposed range of dwelling types are in part a direct response to providing a range of products to suit changing demographic needs.</p>

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				the habitat of the Cumberland land snail and microbats. The preserved land includes floodplain areas and under the proposal this land would be destroyed, in order to prevent this from occurring an added 2 ha needs to be taken back or result in a reduction of the development by 30 lots.		<p>6. See response to (5) above.</p> <p>7. Appropriate storm water management control and WSUD principles have been incorporated into the proposed concept Plan and will be further developed as part of the detail design phase. This has been included in the proposed Statement of Commitment. The Parklands Structure Plan makes provision for market gardens in Area 5 called "Production Based Landscape Zone".</p> <p>8. Additional surveys for Cumberland Plain Land Snail were recommended to be undertaken as part of the impact assessment process during concept design. This survey has since been completed and is attached. The results of the survey found that a small percentage of CPLS will require relocation. However, the large majority of the population will not be impacted by the proposed development. Further it was recommended that areas of African Olive be treated on site to improve and expand the available habitat for this CPLS population adjacent to the site.</p> <p>9. Additional surveys for microbats could not be completed during the Concept Plan stage due to the bats' winter torpor period. During the summer these surveys have been undertaken and a report is attached. The results of the survey support other survey results for the area and no additional threatened species or roosts were location within the parklands.</p> <p>The development concept meets the 'maintain and improve test' under Part 3A of the EP&A Act. The loss of high conservation value vegetation is acknowledged and will be adequately offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, as they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands.</p>
8		Blacktown and District Environment Group Po. Box 207 DOONSIDE NSW 2767	Object	<ol style="list-style-type: none"> The proposal should be rejected and site should be dedicated to conservation and passive recreation pursuits. There should be a reduction in the number of housing lots by 42 in specified areas to give ecological sustainability some credibility. Documents exhibited failed to include a list of flora and fauna species identified on the site. The report should take into account more than species that 'were threatened'. The report did not allow the public to assess what and where 'Regionally Significant' species existed on site. Such information is valuable for establishing the matrix of endangered ecological communities on site and assess what losses would have in a regional context and compare the offset strategy with what will be lost on the ground. The proposal would deny the thorough evaluation of the impacts of the proposed development on flora and fauna on site and in the region. Proper community consultation has been denied. The EA identified the existence of the Species Cumberland Snail which is listed on the Threatened Species Conservation Act. The assessment says 'all these records are within the development footprint' (northwest section) yet the proposal seeks to destroy the area where the threatened species exists. This is contradictory to the Threatened Species Conservation Act. The EA says that further surveys were necessary to quantify earlier findings, yet there was nothing in the Report showing whether these surveys were undertaken and what the results were, thus this was a failing of the exhibition and consultation process as they could not comment on the results of an important part of the EA. Thirteen microchiropteran bat taxa are recorded as utilising the site, of these Eastern free-tail, Eastern bent-wing bat, Fishing bat and Greater Broad nosed bat are listed under the TSCA. The EA identified 10 trees with suitable hollows for habitat of these bat species and all these trees are in the northern section of the site proposed for redevelopment. No attempt is made to ensure that habitat for these species is secured. The EA says 'it will be necessary to establish that no roost sites exists within or adjacent to the development footprint'. An assessment should also be completed to quantify impacts on foraging habitat and resources. 	<ul style="list-style-type: none"> Design Natural environment Community consultation and exhibition process Flooding Recreation resources 	<ol style="list-style-type: none"> Approximately 325 hectares of the site of the site (equating to 85 percent of the total area) is being developed for Regional Parklands or local open space, heritage conservation areas and the like. The 55 hectares residential precinct is proposed to provide revenue for the Parklands. Sections 7.1.5, 7.4 and Appendix D comprehensively address the heritage issues associated with site. The recommendations within the Conservation Management Plan prepared for the site have been incorporated into the proposal's design and reinforced through the statement of commitments. Residential lots have been located in areas which will result in minimal impact. A reduction in lots is not considered warranted. A copy of the flora and fauna list has been appended to the PPR. Threatened species were addressed and focused upon as a legislative requirement. A number of regionally significant species identified during the Urban Bushland Biodiversity Study (UBBS) have since been listed as vulnerable species under the TSC Act, and are addressed in the report. All endangered ecological communities and threatened flora and fauna species identified during field surveys have been recorded and mapped. No Regionally Significant species to the Blacktown LGA were identified during field surveys. There is the potential for a number of regionally significant species to occur within the Parklands. However, these will not be impacted by the proposed residential development. The concept plan provides details and adequate information to meet the 'improve or maintain' threshold required by the Act. Additional information unavailable at the time of lodgement due to seasonal constraints (ie: Bat Surveys) has been completed and is attached. These additional reports will be required to be considered and taken into account in the project approval stage or during development applications. The EA was available on public exhibition for 72 days, available on the website, advertised in local and metropolitan newspapers and adjoining residents were also notified in accordance with the Department of Planning's notification requirements. The public was given ample opportunity to review and assess the documentation. An additional Cumberland land snail survey was undertaken within the Doonside Residential Parcel and Bungarribee Parklands Precinct. This survey identified that the large majority of the snail population is located outside the development footprint, with only 10% occurring within the development footprint. On this basis the impacts are not likely to pose a significant impact on

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				<p>Such surveys would need to be undertaken in Spring/Summer when targeted species are active following their torpor period'. There is nothing in the Report that states when these surveys were undertaken and what the results were. This is a failing of the community consultation process and they were not allowed to comment on the results of an important part of the environmental assessment.</p> <p>11. The EA says 'Areas that were classified as the high conservation significance category 'core' are located in the north-west of the study area'. Page 35 of the EA shows figure 7 identifying areas of proposed development on the site and their relevant conservation significance assessment.</p> <p>12. Landcom seeks to destroy all the area identified as 'core' - the highest conservation status on the site.</p> <p>13. Landcom do not care that this site is the best representation of 'endangered' Cumberland Woodland on the site, the established area of habitat for the TSC Act listed Cumberland Snail and identified area of suitable habitat for TSC listed microbats which are known to be in the immediate area and suitable habitat for other listed species.</p> <p>14. The loss of 'core' or 'high conservation significance' vegetation has significant consequences as it brings 'key threatening processes' much closer to 'high conservation significance' vegetation outside the development site. The bringing of development into such close proximity exposes the adjoining high conservation significance vegetation to greater threats of human activity, pet activity, weed escape, dumping than presently occurs.</p> <p>15. Flood events have introduced weed escapes from upstream of Bungarribee and Eastern Creeks.</p> <p>16. The combination of replacement of 'high conservation significance' vegetation within the site and continued upstream weed invasion events will narrow the margin of resistance to weed threat for the adjoining 'high conservation significance' vegetation within the Western Sydney Parklands.</p> <p>17. The existence of vegetation outside the development area is not sufficient to justify the destruction within the development area.</p> <p>18. Flood Risk and The Rivers and Foreshores Improvement Act, influenced the establishment of boundaries for the area excised from the former Telstra site for development. It is not for Landcom to be looking to adjoining land for natural heritage conservation outcomes.</p> <p>19. There has to be a scientific evaluation of the conservation value of native vegetation within the development area.</p> <p>20. Those areas within the development site identified as 'core' or 'support for core' as well as sufficient areas of native grasslands, and all areas of habitat for TSC listed species, this is made easier by the fact that a lot of the 'support for core' vegetation is within a flood zone.</p> <p>21. There are guidelines for determining green offsets – the first principle is that impacts must be avoided first by using all cost effective measures, scope exists within the proposal to reduce the proposed number of lots by 42 houses to achieve a better biodiversity outcome than the proposal.</p> <p>22. Problems exist with the offset for destroyed 'core' and 'support for core' Cumberland Plain Woodland, threatened species and habitat for threatened species, the use of the areas of Western Sydney Parklands is unacceptable.</p> <p>23. The Parklands are essentially publicly owned and receive funding from a range of sources. Offsetting is designed to primarily protect native vegetation on private lands rather than lands owned by government departments and which is already secured for protection or conservation. The offsetting proposal is on contradiction to this condition.</p> <p>24. Even if it were possible to utilise public land as an offset, the proposal seeks to utilise land which is already Cumberland Plain Woodland. Blacktown LGA has two areas within the Telstra site, one with regenerating Cumberland Plain Woodland and with established Cumberland Plain Woodland, one of these is proposed for destruction.</p>		<p>the population. The report also provides a number of mitigation measures (i.e. translocation and habitat improvement) aimed at reducing impacts on resident snails and to maintain a viable population within the site given the propose location and current conditions.</p> <p>8. Since the Part 3A application was first submitted to DoP in September 2007 additional ecological surveys have been undertaken including: Cumberland Land Snail and Microchiropteran and Megachiropteran Bat Survey. Both reports recommend a number of measures to reduce potential impacts on resident species. A copy of these reports has been appended to the PPR.</p> <p>9. A Microbat survey of the Doonside Residential Parcel and adjacent land within the Bungarribee Parklands Precinct was undertaken in February 2008. This survey identified no roosting sites within hollow bearing located within or immediately adjacent to the development footprint. Observations of these hollows were undertaken at dusk on four consecutive nights to identify if any microbats utilise the hollows for roosting.</p> <p>10. A Microbat survey of the Doonside Residential Parcel and adjacent land within the Bungarribee Parklands Precinct was undertaken in February 2008. This survey was conducted over a vast area, including the Doonside Residential Parcel and adjacent land within the Bungarribee Parklands Precinct, surveying the potential foraging habitat for microbat species. Methods included Anabat detection and Harp Trapping. Further, the dedication of revegetation and management of the parklands will improve habitat availability for these species.</p> <p>11. The Cumberland Plain Woodland located within the development footprint accounts for 7 percent of good condition vegetation within the Parklands area. There is a greater representation of Cumberland Plain Woodland located outside the development footprint, within the Bungarribee Parklands Precinct.</p> <p>12. At present, this vegetation located outside the Doonside development footprint, has a strong presence of weeds, human interference (tracks, litter, dumping, etc), and is suffering from edge effects. The vegetation outside the development footprint will be protected, enhanced and managed on an ongoing basis. This vegetation is where the bulk of the Cumberland land snail population is located, as well as a higher abundance of potential roosting and foraging habitat for microbats.</p> <p>13. See responses to (10) and (11) above.</p> <p>14. The loss of high conservation value vegetation is acknowledged and assessed. Consideration of the impact is provided for and meets the 'maintain and improve test' under Part 3A of the EP&A Act. The loss of this vegetation will be offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, because they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Strategy.</p> <p>15. This issue will be addressed in the Western Sydney Parklands Trust Management Plan. Funding provided as a consequence of the development of Doonside will assist in delivering these broader environmental outcomes across the Western Sydney Parklands.</p> <p>16. See response to (14) above.</p> <p>17. The removal of vegetation within the development area will be offset, providing areas that have been previously degraded to be restored, enhanced and recreated. The Concept plan relates to the whole Parklands area and the development within the Doonside Residential parcel will contribute to these environmental improvements.</p> <p>18. Noted. The proposed offsets will create a more sustainable habitat corridor, as they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Vision.</p> <p>19. A Conservation Significance Assessment has been completed for the site, using a methodology endorsed by DECC.</p> <p>20. Noted.</p> <p>21. See response to (14) above.</p> <p>22. See response to (14) above.</p>

No.	Date	Submitter	Nature	Comment	Issue Summary	Landcom Response
				<p>The proposed offset is not a maintain or improve outcome, it results in a net loss.</p> <p>25. Replanting as an offset strategy for loss of established Endangered Ecological Communities sets back the ecology/biodiversity for however long the lost EEC had been established. At its worst it may also be a total loss of ecology/biodiversity if a later government decision removes the planting that had been undertaken in previous years,</p> <p>26. For example the replanting by Greening Australia is now prone to destruction to make way for a zoo.</p> <p>27. No indication is given by the proponent as to how consideration of structure, function and composition of elements of biodiversity – particularly relating to the lost threatened species and their habitat; enhance biodiversity at a range of scales.</p> <p>28. The EA says that 'recreation of an EEC has not yet been successful' Why should Blacktown LGA already deprived of 60ha of what should be parkland but is 'hived off' for residential development be subjected to an unproven experiment which destroys 'high conservation significance vegetation'?</p> <p>29. The word recreation is incorrect as the original site is not being 'recreated'.</p> <p>30. The planned machine planting will result in plantation like rows of vegetation comprising a range of species. This is unnatural and unrepresentative of what will be lost if such an offsetting scheme is adopted.</p> <p>31. Blacktown and District Environment Group is frustrated at the loss of Endangered Ecological Communities and TSC listed species, even mechanisms for offsetting can be manipulated.</p> <p>32. The development proposal seeks to destroy more than private developers have been allowed by Local and State Governments in the past.</p> <p>33. Blacktown LGA has been deprived of a sizeable area which had been hoped would be a worthwhile conservation and passive recreation area.</p> <p>34. Can this development not be approved so that an area of conservation and passive recreation be achieved on the site?</p> <p>35. At a minimum can the development:</p> <ol style="list-style-type: none"> be reduced by 33 end housing lots to protect the 'core' and 'support for core' and 'other' land and 9 end housing lots to protect more of the area identified on the map of the Ecological Impact Assessment as 'Support for Core' (These lots are located at the western edge of two arms of development extending into bushland in the north-west section of the site). 		<p>23. The proponent is not aware of any restrictions placed on government departments with regard to offsetting in order to meet the 'maintain and improve test' under Part 3A of the EP&A Act.</p> <p>Bio Banking under the TSC Act restricts the use of offsetting for sites/lands already managed for conservation. However, this legislative mechanism is not proposed for the Bungarribee Parklands.</p> <p>24. The areas of the Bungarribee Parklands Precinct that will be used to offset the removal of Cumberland Plain Woodland are of an extremely degraded state, with scattered trees, very little understorey, and a mixed groundcover of native and exotic species. These impacts have been considered and meet the 'maintain and improve test' under Part 3A of the EP&A Act. The loss of this vegetation will be offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, for they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Strategy.</p> <p>25. The offset areas and the time lag in replacing biodiversity are acknowledged, and funding is allocated for further management over the longer timeframes.</p> <p>26. Uses and development footprints within the Parklands are indicative only. Matters related to vegetation loss from future development within the Parklands will be managed by the recently created Parklands Trust.</p> <p>27. The ecological impact assessment describes the vegetation communities, structure and composition of what is presently located within the Doonside Residential Parcel. All potential impacts on the vegetation communities have been considered, and assessed at a State (TSC Act) and Federal (EPBC Act) level. The parklands concept plan provides the local context that will achieve a positive biodiversity outcome.</p> <p>28. Recreation is just one part of the broader environmental outcomes on site. Recreation is used to describe advanced revegetation where the objective is to re-establish as close to the full suite of flora species and structure of a vegetation community, in this case Alluvial and Shale Plain Woodlands and native grasslands. Tree planting alone does not provide sufficient diversity in structure, habitat and plant species to support diverse wildlife or the regeneration of Cumberland Plain Woodland.</p> <p>29. See response to (28) above.</p> <p>30. It is not anticipated that the outcome from revegetation to be rows of trees, but a structure and composition of vegetation as close as possible to remnant vegetation communities.</p> <p>31. The offset ratios used were negotiated with the NSW Government, in particular the Department of Environment and Climate Change (DECC), and Department of Planning (DoP). There were several sources reviewed to develop the offset principles, including the Liverpool Biodiversity Strategy, NSW Government's Green Offsets for Sustainable Development Concept Paper (2002), and the NSW Department of Natural Resources Native Vegetation Regulation 2005: Environmental Outcomes Assessment Methodology (2005) to develop the principles utilised in the project. A referral to the Commonwealth DEWHA was made to comply with the Federal Environmental Protection and Biodiversity Conservation Act 1999. Consent, with no conditions, was granted by the DEWHA for the concept plan.</p> <p>32. The development proposal will result in the loss of 12.54ha of remnant vegetation (0.37ha AW, 4.57ha SPW, and 7.6 grassland), of varying condition classes. This loss will be offset at a ratio of 3:1 for good condition vegetation, 2:1 for poor condition vegetation and 1:1 for grassland. This means that 27.88ha (1.11ha AW, 11.57ha SPW, and 15.2ha grassland) of land will be recreated, revegetated, protection, or relocated as a result of this proposal.</p> <p>33. Conservation and passive recreation objectives are contained within the Concept Plan.</p> <p>34. See response to (32) above.</p> <p>35. Ecological issues are considered to have been adequately addressed, this is supported by the ecological investigations carried out. Residential lots have been located in areas which will result in minimal impact. A reduction in lots is not considered warranted. It should be noted that while reducing lots in these</p>

No.	Date	Submitter	Nature	Comment	Issue Summary	Landcom Response
						locations may reduce environmental impacts, this would impact upon project viability, directly affecting the viability and greater ecological outcomes related to the whole Parklands.
9		Blacktown Aeromodellers Club Incorporated PO.Box 843 BLACKTOWN NSW 2148	Consideration of their needs	<ol style="list-style-type: none"> 1. Blacktown Aeromodellers Club have used Western Sydney Parklands for the last 20 years and they have a tenure from the NSW DoP. 2. The proposed development will mean the loss of their flying field. As the proposal does not include any proposed space specifically reserved for flying. 3. The Social Sustainability Study mentions model aircraft flying as a desirable activity in the area. 4. As long term tenants they request that their needs be taken into consideration in the planning process for the development 5. Flying model aircraft fit in well with the desired aims of the precinct. 6. There are other areas of open space in the precinct that may be suitable and they would be prepared to move. 7. They need an open space area the size of a football field as they can also fly over some of the land surrounding it, they also need some vehicle access, parking and preferably some shelter form the sun and a toilet nearby. 8. At present their site is available 7 days a week, although it is used mainly on weekends. 9. The Club has 70 members and 12 on the waiting list, ranging in age from 8 to 70 yrs plus. 10. Aeromodelling is a popular sport, help preserve this activity in Western Sydney. 	<ul style="list-style-type: none"> • Provision of space for the Aeromodellers Club 	It is envisaged that the proposed Airstrip Promenade within the Parklands Precinct will be a more suitable area for the Aeromodellers Club. The Aeromodellers Club is encouraged to approach the Department of Planning to discuss relocation and potential sites within the Parklands.
10		Member of the public	Object	<ol style="list-style-type: none"> 1. Bushland in the north west section has been identified in the survey as only 'core' bushland area on site and Landcom are seeking to destroy it for housing. 2. The core bushland has been identified as having habitat for the Cumberland Snail, the only Cumberland Snail Area identified on the whole site. It is also likely habitat for microbats and other fauna species because of hollows in trees. 3. The proposed effects are unacceptable as the areas chosen for this, if left undisturbed will regenerate naturally. 4. The development should be reduced by 30-35 houses in the Northwest section. 5. The whole development is a poor alternative to what is there now. 6. Blacktown LGA is covering the cost of allowing open space to be preserved in Fairfield and Liverpool LGAs. 	<ul style="list-style-type: none"> • Natural environment • Design • Impact on Blacktown for the provision of space 	<ol style="list-style-type: none"> 1. The loss of high conservation value vegetation is acknowledged and assessed. The impact have been considered and the proposal meets the 'maintain and improve test' under Part 3A of the EP&A Act. The loss of this vegetation will be offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, because they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Strategy. 2. Since the Part 3A application was first submitted to DoP in September 2007 additional ecological surveys have been undertaken including: Cumberland Land Snail and Microchiropteran and Megachiropteran Bat Survey. Both reports recommend a number of measures to reduce potential impacts on resident species. A copy of these reports has been appended to the PPR. 3. See response to (1) above. 4. Ecological issues are considered to have been adequately addressed, this is supported by the ecological investigations carried out. Residential lots have been located in areas which will result in minimal impact. A reduction in lots is not considered warranted. It should be noted that while reducing lots in these locations may reduce environmental impacts, this would impact upon project viability, directly affecting the viability and greater ecological outcomes related to the whole Parklands. 5. Noted. 6. Noted.
11		Member of the public	Object	<ol style="list-style-type: none"> 1. Images of site showing Bungarribee farm from North East 1928 Painting showing Open fields 80+ yrs before. 2. LFA Pacific PL Image, 2005 comp – 'a favoured ideal instead of high density housing'. 3. Painting by Joseph Fowles, Bungarribee, Eastern Creek 1858. 	<ul style="list-style-type: none"> • Heritage 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted.
12	9 Feb 08	Member of the public	Object	<ol style="list-style-type: none"> 1. Endorsement of previous objection by a member of the public. 	<ul style="list-style-type: none"> • Heritage 	<ol style="list-style-type: none"> 1. Noted.

PART B – AGENCY AND GOVERNMENT SUBMISSIONS

No.	Date	Submitter	Nature	Comment	Issue Summary
e1	18 Dec 07	Nika Fomin Development Control Co-ordinator NSW Rural Fire Service Locked Mail Bag 17 GRANVILLE NSW 2142	Comment	<ol style="list-style-type: none"> Land is bushfire prone and has bushfire issues. Future development is subject to S.100B of the Rural Fire Services Act & 79BA of EP& Act. Developer's bushfire consultant has considered Special Fire Protection Purposes. The institutional zone is proposing SFPP developments thus an assessment based on these developments is required to demonstrate compliance with Planning for Bushfire Protection. Inconsistencies between the extent of Assessed Future Vegetation Formations and proposed vegetation depicted on drawings. The APZs assessed by Eco Logical Australia are derived from compliance with Planning for Bushfire Protection however the APZs are based on a level 3 construction. Reduced constructions levels would necessitate increased APZs. The consultant's Report does not address vegetation management of the site outside APZs. RFS encourages a Vegetation Management Plan to address the strategic management of vegetation across the site. 	<ul style="list-style-type: none"> Bushfire
				<ol style="list-style-type: none"> Noted. Development that will occur within the Doonside Residential Precinct will undergo further assessment at the DA stage and will meet the requirements under S.100B of the Rural Fire Services Act & 79BA of EP& Act. Noted. Uses for each lot (ie. Childcare centres etc) have not been undertaken as yet. Consequently, an assessment of Special Fire Protection Purposes (SFPP) developments has not been undertaken. This assessment will be undertaken with future project applications when detailed plans are available. The future applications will need to demonstrate compliance with the Planning for Bushfire Protection SFPP requirements. The bushfire assessment highlights the APZ required for boundaries and details requirements for special uses in accordance with Planning for Bushfire Protection (2006). Future Vegetation Formations adjacent to the development footprint have been considered, and are a practical driver behind the use of Themeda Grasslands adjacent to the development footprint. Grassland adjacent to the development footprint will be easily managed, and poses a decreased fire risk than woodland and forest formations. Noted. Noted. Noted. See response to (4) and (5) above. The Statements of Commitment obligate Landcom to the preparation of a Site Management Plan (SMP). This is also required under Clause 13 of the Sydney Regional Environmental Plan No. 31 – Regional Parklands (SREP 31), and must be prepared in accordance with the requirements of Development Control Plan No. 1 – Interim Regional Parklands Management (DCP 1). Vegetation management across the site will be considered within the SMP. 	
2	11 Feb 08	Ken Moon Chairman Sydney Regional Development Advisory Committee Po. Box 973 PARRAMATTA NSW 2124	Suggested modifications No objection to rezoning	<ol style="list-style-type: none"> Conditions of consent to include: <ol style="list-style-type: none"> Signalised T intersection must be constructed along the Great Western Highway prior to completion of development in zones 3 and 4; Property is affected by future road widening as shown of map supplied with submission, however RTA would raise no objection on property grounds to the submitted proposal subject to no new structures or developments being constructed in the affected area. Access is denied across M7 and M4 boundaries of property Any new access points or modifications to any existing points to the Great Western Highway will require detailed design plans to be forwarded to the RTA Proposed traffic signal works shall be designed to meet RTA requirements Certified copies of signal design plans shall be submitted to the RTA for approval prior to the release of a construction certificate and commencement of road works RTA fees for plan checking, administration, civil/signal works inspections and project management are to be paid prior to commencement of works Developer may be required to enter into a Works Authorisation Deed which will need to be executed prior to RTA assessment of design plans All works and signposting shall be at no cost to the RTA No objection to the proposed rezoning RTA will not approve the provision of 3 signalised mid block pedestrian crossings at <ol style="list-style-type: none"> Eastern Rd – west of Doonside Rd roundabout Doonside Rd - adjacent to Birdwood Avenue and Doonside Rd - adjacent to Bowes Place. RTA would support Council's recommendation for the signalisation of 	<ul style="list-style-type: none"> Traffic
				<ol style="list-style-type: none"> Landcom has revised the Statements of Commitment to reflect its commitment to the proposed intersection works. Landcom requires a copy of the plan showing any properties affected by road widening prior to comment. Noted that RTA raises no issues with the proposed rezoning. Noted. Pedestrian crossings will be provided as part the new signalised intersections on Bungarribee Road and Eastern Road. Additional traffic modelling has been undertaken in response to the RTA and Council's comments. As a result, the proposed roundabout intersections at Bungarribee Road and Eastern Road have been reconsidered, and these will now be signalised intersections. RTA will continue to be consulted through future project applications in accordance with the requirements of the Infrastructure SEPP and EP & A Act. See revised Statements of Commitment about on-going consultation. The signalisation of the intersections will improve all intersection performances. Vehicle delay is minimised by consolidating pedestrian crossings and intersections. The results of the intersection performance assessment with signals installed concluded intersection performance would be satisfactory. Signalisation of the Doonside Road/ Bungarribee Road intersection improves operation during the morning peak significantly over a 'without development' scenario. Future applications will be supported by a traffic assessment that considers impacts and car parking requirements in the context of existing road capacity and infrastructure. Future applications will be supported by detailed assessments that justify any proposed development. Fencing is not proposed given that pedestrian crossings will now be provided at the signalised intersections. Detailed traffic studies will be prepared for individual projects to confirm project 	

No.	Date	Submitter	Nature	Comment	Issue Summary
				<p>Doonside Rd/Eastern Rd intersection.</p> <p>6. A conceptual design for the signalisation at Doonside Eastern Road must be submitted to the RTA prior to the issue of a construction certificate for the Doonside Residential Precinct.</p> <p>7. The additional traffic caused by the proposal will increase delays and cue lengths at the Doonside Rd approach as such the applicant will be required to provide a separate 50m long left turn only lane on the Doonside Rd approach.</p> <p>8. Zone 7 will also include a future commercial development however the current application is only for open space and recreational uses within zone 7.</p> <p>9. In future if zone 7 should be used for commercial development, the RTA must be consulted prior to the lodgement of any DAs for commercial development.</p> <p>10. RTA supports Council's recommendation for the developer to provide pedestrian fencing within the median along key intersections within Doonside Rd and Eastern Rd facing the residential precinct.</p> <p>11. The intersection of Doonside Rd/Holbech Rd should be upgraded to specified configuration.</p> <p>12. Intersection of Eastern Rd/sports field access and Softball Complex Access should be upgraded to specified configuration.</p> <p>13. Holbech Rd (East leg) – line marking adjustments to provide a left turn slip lane, a shared through/right turn lane and an exclusive right turn only lane.</p> <p>14. Doonside Rd (North leg) provision of a separate 40m long right turn bay.</p> <p>15. Site Access (west leg) provision of two approach lanes and a single departure lane.</p> <p>16. The intersection of Eastern Rd/ Sports Field Access/ Softball Complex Access should be upgraded to the following configuration:</p> <ol style="list-style-type: none"> The intersection of Eastern Road (East leg) provision of a separate 70m long left turn slip lane Sports Field Access (South leg) Extension of a right turn lane to provide 75m of storage. <p>17. A Traffic Management Plan should be prepared for approval by the RTA and Council for peak events within the Sports Zone and should address:</p> <ol style="list-style-type: none"> Addressing external traffic management The entry/exit capacity to the Sports Zone can adequately handle peak traffic volumes during peak sell out events The potential need for traffic/parking controllers to be present during peak sporting events, directing and parking vehicles in an appropriate manner, preventing queues overflowing onto Eastern Road. Addressing issues related to vehicles likely to park outside of the sports zone (i.e. by ensuring that an adequate overflow parking area is provided nearby). <p>18. The possible need for police or RTA staff and portable variable message signage.</p> <p>19. Car parking provision is to be to the satisfaction of the Department of Planning.</p> <p>20. The layout of proposed car parking areas (including driveways, queuing areas, grades, turn paths, sight distance requirements, aisle widths, internal circulating roadways and parking bay dimensions) should be in accordance with AS2890.1 AND as2890.2-2002 for heavy vehicles.</p> <p>21. Developer shall be responsible for all public utility adjustment/relocation works necessitated by the above works and as required by the various public authorities and or their agents.</p>	<p>specific traffic and car parking issues and requirements. The Statements of Commitment have been revised to confirm this is the case.</p> <p>12. The traffic modelling undertaken for the proposal does not require the upgrade of this intersection as result of the Doonside Residential Precinct.</p> <p>13. To be addressed as part of the detail design phase which will be carried out on due course.</p> <p>14. See response to (11) above.</p> <p>15. See response to (11) above.</p> <p>16. Part of the detail design phase which will be carried out in due course by the recently created Parklands Trust.</p> <p>17. See response to (11) above.</p> <p>18. Detailed traffic studies will be prepared for individual projects to confirm project specific traffic and car parking issues and requirements.</p> <p>19. See response to (11) above.</p> <p>20. The proposal will be undertaken in accordance with all relevant applicable Australian Standards. The Statements of Commitment have been revised to confirm this is the case.</p> <p>21. The Statements of Commitment obligate provision of infrastructure and utilities to be provided on a project by project basis.</p>
3	29 Feb 08	The General Manager Blacktown City Council Po Box 63 BLACKTOWN NSW 2148	Objection	<p><u>Zoning</u></p> <ol style="list-style-type: none"> Council is in the process of preparing its City-wide LEP in accordance with the Standard Instrument Order 2006. New zonings within the precinct should be in accordance with the 	<ul style="list-style-type: none"> Urban Design Traffic Environment <p><u>Zoning</u></p> <ol style="list-style-type: none"> Noted. Noted.

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				<p>Standard Template. (note)</p> <p>3. Object to R1 General Residential Zone as it will permit residential flat buildings in an area characterised by low density detached housing and is inconsistent with the intent and controls within the Development Design Code and there is no justification for the proposed zoning.</p> <p>A more appropriate zoning would be R3 Medium Density Residential.</p> <p>4. Final zonings for the Council's surrounding areas will be determined once Council has completed its City wide Housing Strategy.</p> <p>5. Creek corridors should be zoned E2 Environmental Conservation not RE1 Public Recreation.</p> <p>6. The proposed electrical substation should be consistent with surrounding zoning as opposed to SP2 Special Infrastructure.</p> <p><u>Lot Sizes</u></p> <p>7. Concerned about the grouping of lots less than 450sq.m, particularly lots between 250-350sq.m. The minimum groupings should be 5 lots in accordance with the integrated housing provisions with in BCC DCP 2006.</p> <p>8. Lots less than 450sq.m should not be developed individually, but rather as part if a group of lots that are less than 450sq.m to ensure a coordination of cut/fill, zero lot lines and dwelling designs as well as impact on adjoining properties. This needs to be reflected in the DDC or SEPP amendment applying to the land.</p> <p>9. Zero lot line walls on common boundary between a lot less than 450sq.m and 450sq.m lot or greater is not supported.</p> <p><u>General</u></p> <p>10. The proposed DDC essentially adopts the same provisions outlined in Blacktown DCP Part M and is thus supported.</p> <p>11. Concerns regarding the proposed 3 – 3.5m high noise barriers along Doonside Rd. Any proposed noise barriers should avoid blank walls and include a mix of earth mounds, vegetative screening and decorative fencing in order to preserve the streetscape.</p> <p>12. It is inappropriate for Council as the future consent authority for the proposed residential precinct to be part of a Design Review Panel as such any reference to BCC in this regard should be removed.</p> <p>13. Whilst the Concept Plan nominates Council as the future consent authority for development within the Doonside Residential Precinct. Clarification is required as to whether Council will be the consent authority for works within the Bungarribee Precinct in the Parklands.</p> <p>14. The Concept Plan makes no reference to the provision of affordable housing within the Doonside Residential Precinct. This needs to be addressed to ensure a greater supply of housing choice for future residents of the precinct and Blacktown.</p> <p><u>Heritage</u></p> <p>15. The Core Heritage Area proposed in the Heritage Assessment Report does not provide an adequate curtilage to properly appreciate the buildings as elements in a rural landscape. A greater buffer is needed between the area of archaeology of the main house and the area for residential development.</p> <p>16. The proposed area of residential development encroaches onto the edges of the view corridor to the southwest of the core heritage area.</p> <p>17. The buffer of trees suggested between the between the view corridor and the future one to two storey residential development is not sufficient and will impact on the interpretation of the open rural landscape that was an essential part of the views from Bungarribee House.</p> <p>18. The proposed road subdivision to the south of the Core Heritage Area will encroach on the core heritage area. This needs to be adjusted if possible. If not, the archaeology in the area needs to be investigated prior to being disturbed.</p> <p>19. The proposed disturbance of the archaeological remains assessed as being of moderate significance should follow policy No 30 of the</p>	<ul style="list-style-type: none"> Heritage Voluntary Planning Agreement Drainage Flooding Landuse <p>3. Noted and actioned.</p> <p>4. Noted and agreed.</p> <p>5. Noted and agreed. Landcom has revised the SEPP amendment to include an R3 Medium Density Residential Zoning.</p> <p>6. Noted and actioned.</p> <p><u>Lot Sizes</u></p> <p>7. Not supported on the basis that one of the development's key outcomes is the integration and permeability of the residential precinct with the Parklands. Council's suggested zones are more restrictive than the proposed RE1 Public Recreation Zone and will therefore prohibit embellishment of the subject corridors for passive recreational uses and access paths into the Regional Parklands.</p> <p>8. Noted and actioned.</p> <p>9. See response to (7) above.</p> <p><u>General</u></p> <p>10. Noted and agreed.</p> <p>11. Proposed heights are nominal. Final treatment will include mounding, and careful landscape design which will be part of the detail design submitted with future applications.</p> <p>12. Noted, however Lancom considered this was an opportunity for Council engagement which will ultimately facilitate and streamline the DA approval process. Council has been nominated as a relevant Design Review Panel member to provide local expertise. This can be reviewed if Council wishes.</p> <p>13. The existing consent authority arrangements under SREP 31 are proposed to be retained under the SSS listing, however the Major Projects SEPP and Infrastructure SEPP would also apply and may make provision for the Minister or a public authority to undertake certain development.</p> <p>14. See response to (7) above.</p> <p><u>Heritage</u></p> <p>15. Sections 7.1.5, 7.4 and Appendix D comprehensively address the heritage issues associated with site. The recommendations within the Conservation Management Plan prepared for the site have been incorporated into the proposal's design and reinforced through the statement of commitments. Further, the Bungarribee Homestead curtilage covers an area of approx. 3.39 hectares. The curtilage has been identified in consultation with the NSW Heritage Office and is considered appropriate for the nature of the footings that remain on the site.</p> <p>16. See response to (15) above.</p> <p>17. Reconsideration of the proposed trees species to be located adjacent to the Bungarribee Homestead curtilage will be undertaken to determine a more appropriate species that will better retain views and vistas to the curtilage area. This commitment has been incorporated into the Statements of Commitment.</p> <p>18. The subdivision plan is a direct response to the protection of significant heritage views. The proposed curtilage is considered appropriate for the footings that remain. The Development Design Code seeks to ensure a cohesive and visually pleasing residential precinct which acknowledges the historic uses on</p>

No.	Date	Submitter	Nature	Comment	Issue Summary
				<p>Conservation Management Plan to guide the recording of archaeological remains in these areas.</p> <p>20. Additional archaeological investigation is needed to assess the impacts of development in the future Commercial/Recreational, Production Based landscape, Sports, Former Airstrip Promenade, Institutional and Recreational Hub zones.</p> <p>21. Additional assessment of the heritage significance of 3 houses associated with the Pikes Lane Historic Subdivision is needed. This assessment should consider the retention of Pikes Lane as a rural laneway within the new subdivision.</p> <p>22. Greater effort should be made to interpret the form OTC occupation of the site through retention of cultural plantings and/or road alignments associated with that occupation or in some other publicly accessible way.</p> <p>23. An interpretation plan should be prepared for the former Military Airfield to determine how to best incorporate this part of the site into the overall precinct.</p> <p>24. Consideration should be given to housing design around the entire Heritage Precinct in order to preserve views and vistas.</p> <p>25. The Heritage Interpretation Plan be required to be prepared and implemented for the Bungaribee House ruins, including where possible the conservation of any original features and fabric providing interpretive signage and public art to acknowledge the previous historic house on the site.</p> <p><u>Open Space/Recreation</u></p> <p>26. Previous concerns regarding the proposed residential precinct were raised with Landcom and have not been addressed.</p> <p>27. Provision of local recreational facilities – the majority of open spaces appear to be drainage corridors, conservation zones or cultural/archaeological areas. The exact extent of local open space has not been clearly defined.</p> <p>28. No specific recreation provision strategy has been provided, only a small reference in the Social Infrastructure Report.</p> <p>29. The provision of local recreation facilities has not been defined. It would be envisaged that a minimum of 2 local parklands including playground facilities would be required to service the proposed residential density.</p> <p>30. A pedestrian and cycle network would be required throughout the interlinking open space corridors throughout the site.</p> <p>31. The Bungaribee House site would provide a significant community facility that would include open space and recreational facilities, however the scope of facilities to be provided in this precinct have not been defined.</p> <p><u>Extent of Landscaping</u></p> <p>32. No comprehensive landscaping strategy has been provided, however has been incorporated into the DDC and Concept Plans only.</p> <p>33. The extent of landscaping proposed appears to be in excess of the normal provision of passive or aesthetic landscaped areas provided or accepted by Council.</p> <p>34. The extent of landscaping will burden Council with a higher than usual maintenance liability. The proposals for landscaping would not be sustainable or maintainable within the resources normally allocated by Council. The provision of landscape finishes should have regard to the potential maintenance liabilities and required aesthetic levels to provide a</p>	<p>the site and remaining footings. Further archaeological investigations are being undertaken in areas of high archaeological significance.</p> <p>19. Noted.</p> <p>20. See response to (18) above.</p> <p>21. See response to (18) above.</p> <p>22. The subdivision plan is a direct response to the protection of significant heritage values. Plantings related to the OTC occupancy of the site will be retained (eg. Colour eucalyptus along Doonside Rd.). The road alignments and other elements related to the use of the site in the past will be considered as part of the heritage interpretation strategy committed to in the Statements of Commitment.</p> <p>23. A commitment has been made to prepare a Site Interpretation Strategy.</p> <p>24. See response to (18) above. The Development Design Code's guidelines address height limitations. The Concept Plans and cross sections illustrate these matters.</p> <p>25. Noted and agreed. See response to (18) above.</p> <p><u>Open Space/Recreation</u></p> <p>26. Landcom met on several occasions with Council Staff to discuss issues related to open space and recreation. Council's comments have been addressed in the current Concept Plan.</p> <p>27. Significant areas of the landscaping are associated with the WSUD strategy (ie the creek line corridors and riparian zones; and the eco medians). The Doonside Residential Development WSUD strategy includes a full description of the proposed treatment objectives, sizing, landscape vision and vegetation selection for the eco medians (refer Section 5.1 of the EA), the interface of the development with the parklands (refer Section 5.2 of the EA), streetscape rain gardens / street trees (refer Section 5.3 of the EA), the southern waterway (refer Section 5.4 of the EA) and the northern waterway (refer Section 5.5 of the EA). In addition a species list of recommended vegetation for wetland and bio retention treatment areas is included as Appendix 1 of the Doonside WSUD strategy.</p> <p>Details will be included in the Landscape and Public Domain Strategy that will be prepared prior to lodgement of the project application for subdivision.</p> <p>28. Details will be included in the Landscape and Public Domain Strategy that will be prepared prior to lodgement of the project application for subdivision.</p> <p>29. See response to (28) above.</p> <p>30. Noted and agreed. Pedestrian and cycle facilities will be provided throughout the site through detailed project applications.</p> <p>31. See response to (28) above.VPA and Site Interpretation Strategy will also address this area.</p> <p><u>Extent of Landscaping</u></p> <p>32. Details will be included in the Landscape and Public Domain Strategy that will be prepared prior to lodgement of the project application for subdivision.</p> <p>33. See response to (32) above.</p> <p>34. See response to (32) above.</p>

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				<p>balanced maintenance liability across the site.</p> <p><u>Water Sensitive Urban Design</u></p> <p>35. Proposed eco-medians would not provide an ongoing suitable landscape solution for Council.</p> <p>36. The maintenance liability is in excess of Council's normal provision.</p> <p>37. The design of the median has little regard for any maintenance practices employed by Council.</p> <p>38. The landscape finish would be resource intensive to maintain an acceptable landscape aesthetic.</p> <p>39. Given the location and relation of the eco-medians to the residential properties, the expected level of maintenance would be in excess of that able to be provided by Council.</p> <p>40. Species selection within the eco-median will need to be carefully considered to ensure stormwater runoff to the riparian and conservation areas does not contain contaminating sand or vegetative matter compromising the ecological integrity of communities downstream.</p> <p><u>Streetscape Planting</u></p> <p>41. The use of fruiting and production trees within the streetscape is not supported due to logistical arrangements in relation to pest control and management and the potential for contamination of waterways and downstream ecological communities.</p> <p>42. Planning, design and implementation of street landscaping including street trees needs to consider Council's guidelines and the sustainability of the street tree plantings.</p> <p>43. Species selection needs to have consideration of growth space and residential amenity as well as aesthetic and ecological values. Planting methods need to carefully consider long term impacts on civil infrastructure including drainage and street lighting.</p> <p>44. Large Eucalyptus species within limited verge areas is not supported as a sustainable street tree species.</p> <p><u>Voluntary Planning Agreement</u></p> <p>45. The agreement doesn't provide specific details in relation to the provision of open space and recreational facilities.</p> <p>46. The safety measures in the agreement relies on Landcom needing to enter into a specific agreement with Council prior to the provision of any facilities within the development area.</p> <p>47. Landcom have been requested to provide specific information regarding the nature of the provision of recreational facilities across the Doonside development.</p> <p><u>Bungarribee Precinct – Western Sydney Parklands</u></p> <p>48. Council is a partner in the delivery of soccer development within the active sports precinct.</p> <p>49. The retention of existing soccer fields and amenities on Eastern Rd may present problems regarding access, integration and pedestrian/participation safety into the area, which need to be addressed before detailed designs are completed.</p> <p>50. The impact of the proposed Blacktown Olympic Park AFL/Cricket development will need to be carefully considered as part of the approval for the sporting precinct to the north of the site. This development should link with any parkland proposals with a view to sharing common facilities such as access points, circulation and overflow parking space to cater for major events.</p> <p>51. The impact on hydrology for the Parklands site that may be created through the development of the Blacktown Olympic Park AFL area will need careful consideration and the Parkland may need to accommodate this impact.</p>	<p><u>Water Sensitive Urban Design</u></p> <p>35. Details will be included in the Landscape and Public Domain Strategy that will be prepared prior to lodgement of the project application for subdivision</p> <p>36. See response to (35) above.</p> <p>37. See response to (35) above.</p> <p>38. See response to (35) above.</p> <p>39. See response to (35) above.</p> <p>40. See response to (35) above.</p> <p><u>Streetscape Planting</u></p> <p>41. Details will be included in the Landscape and Public Domain Strategy that will be prepared prior to lodgement of the project application for subdivision.</p> <p>42. See response to (41) above.</p> <p>43. See response to (41) above.</p> <p>44. See response to (41) above.</p> <p><u>Voluntary Planning Agreement</u></p> <p>45. The detail provided for the development of the Bungarribee Precinct is conceptual only, and extensive detailed design will be required prior to implementation of any parkland elements. Generally, the proposed parkland uses are supported.</p> <p>The VPA at this stage reflects the concept plan nature of the proposal, further details will be provided as part of the negotiations that will take place during the detail design stage.</p> <p>46. Noted.</p> <p>47. See response to (45) above.</p> <p><u>Bungarribee Precinct – Western Sydney Parklands</u></p> <p>48. Noted.</p> <p>49. Noted. The proposed layout for this facility may be amended subject to further detailed design, however the general concept plan will remain in accordance with the Concept Plan provided.</p> <p>50. Noted. Detailed project applications will consider these matter however this was always Landcom's intention.</p> <p>51. Flooding and stormwater modelling has demonstrated that the Doonside Residential Precinct will not have an adverse affect on the Blacktown Olympic Park development.</p> <p>Future modelling will also be undertaken as part of Parklands development as stated in the revised Statements of Commitment.</p> <p>52. Noted and agreed. Details will be included in the Landscape and Public Domain Strategy that will be prepared prior to lodgement of the project application for subdivision.</p> <p>53. The detail provided for the development of the Bungarribee Precinct is</p>

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				<p>52. The integrity of remnant communities should not be compromised through inappropriate land use and planting. Species selection should be considered to ensure invasive species are avoided and threatening processes do not compromise the ecological integrity of remaining remnants.</p> <p>53. Further information is required regarding the indoor sport, cultural and recreation facility and it's identified users in order for Council to provide comments.</p> <p>54. Children's play facilities in the Bungarribee Precinct should be provided in an integrated manner on a hierarchical basis with consideration of a themed approach across the Precinct.</p> <p>55. Consideration should be given to the creation further open space /kick about/ play space area (equivalent to 2 fields) within the Sports Zone to accommodate spill over major event operations and flexible delivery of recreation/sport pursuits related to zone functions.</p> <p>56. The provision of both cycleways and pathways should be linked to a hierarchical system considering length, terrain and difficulty with ample rest stops or pause points throughout.</p> <p>57. Consideration should be given to the provision of a local off-road BMX track for access to Bungarribee residents in the vicinity of North Creek.</p> <p>58. Any further development of median strips needs to clarify suggested maintenance and access regimes for ongoing management.</p> <p>59. The concept of an eco-park requires further information to clarify ongoing management/maintenance issues, public safety and aesthetics.</p> <p>60. Consideration should be given to water and the use of recycled water for sports facilities and parklands.</p> <p><u>Flooding</u></p> <p>61. Proposed changes to landforms, vegetation, provision of car parks and buildings within the Concept Plan may have a significant effect on flood behaviour of the Eastern Creek floodplain which has not been assessed.</p> <p>62. The proposed Sports Zone is significantly effected by flooding in the 1% Annual Exceedance Probability storm event. In such a situation, conditions on development would require a freeboard to the floor level of structures and a maximum depth of flow over the car parking areas, generally 500mm freeboard for the floor level and a maximum flow depth of 200mm over the parking areas.</p> <p>63. The impact of construction within the Sports Zone would have to be modelled hydraulically to ensure that there was no adverse impact on adjoining areas, particularly the Doonside Residential Precinct. Under current Government conditions, this should be assessed for all floods including the Probable Maximum Flood although planning levels would be set to the 1% AEP flood.</p> <p>64. The playing fields should be designed to provide compensatory storage within the floodplain. It is also considered that this compensatory storage should incorporate additional storage to compensate for the proposed stadiums on the northern side of Eastern Road. This will provide a major benefit to the community as the proposed compensatory works for Charlie Bali Reserve would not be required, allowing it to remain in operation. The extent of storage requirement has not been fully investigated.</p> <p><u>Water Sensitive Urban Design and Hydraulics</u></p> <p>65. There is no mention of how compliance with these water quality targets can be determined / measured. There needs to be modelling undertaken and model parameters adopted.</p> <p>66. The WSUD strategy concentrates on peak flow minimisation to "mimic" the natural pre-developed (low impervious area) hydrographs for frequent storm events, up to the 1.5 yr ARI event. However, no targets are set regarding emulating runoff volumes and the length/frequency of "bank full" flows. This is a major omission, particularly given that the Growth Centres Commission has set targets and standards in this area.</p> <p>67. Environmental flows must be maintained in the creek systems. Extensive</p>	<p>conceptual only, and extensive detailed design will be required prior to implementation of any parkland elements. Generally, the proposed parkland uses are supported.</p> <p>The VPA at this stage reflects the concept plan nature of the proposal, further details will be provided as part of the negotiations that will take place during the detail design stage.</p> <p>54. See response to (53) above.</p> <p>55. See response to (53) above.</p> <p>56. See response to (53) above.</p> <p>57. See response to (53) above.</p> <p>58. Noted. This will be addressed through future applications</p> <p>59. See response to (59) above.</p> <p>60. See response to (59) above.</p> <p><u>Flooding</u></p> <p>61. Bewsher Consulting has re-run the flood modelling for the 100 year ARI and PMF events. The results indicate there will typically be only minor impacts on the 100 year and PMF flood levels and associated extents arising from the Doonside Residential Precinct and embellished vegetation corridor within the Parklands.</p> <p>Flood related matters associated with the Sports Zone and other Parklands recreational uses will be addressed through future project applications. The Statements of Commitment have been revised to provide assurance to the Minister that flood impacts will be considered in due course.</p> <p>62. See response to (61) above.</p> <p>63. See response to (61) above.</p> <p>64. See response to (61) above</p> <p><u>Water Sensitive Urban Design and Hydraulics</u></p> <p>65. MUSIC modelling software was applied to the proposal to determine the performance of the proposed stormwater treatment systems. The proposed WSUD systems have been are designed as a direct response to the modelling results. Specifications for the soil used for the bio-retention system filter media are available (and have previously been provided to Council).</p> <p>Verification of the systems' intended operation can be provided with relevant applications for Construction Certificates if considered necessary.</p> <p>66. Detention of storm flows from both the urban development and the external catchment for the 1 in 1.5 yr ARI event is aimed at limiting the erosive impacts on the downstream waterways. Notwithstanding this, detailed design will be</p>

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				<p>stormwater harvesting has the potential to deprive creeks of essential base flow, especially during prolonged dry periods. There appears to be limited consideration of incorporating stormwater harvesting and WSUD elements into the built structures, particularly in the Institutional Zone.</p> <p>It is recommended that best practice be demonstrated through the adoption of a treatment train approach which starts at the lot level and incorporates stormwater harvesting and WSUD into the built form (i.e. architectural design).</p> <p>Water balance modelling should be undertaken at the development stage and listed as a requirement with objectives at the precinct planning stage to determine the effects of stormwater harvesting for irrigation etc on environmental flows.</p> <p>68. There is a lack on continuity in management of the water-cycle between the precincts. For example, stormwater harvesting using rainwater tanks is considered in detail for the Sports Precinct, however the Recreational Hub and Institutional Precinct does not appear to adequately consider this option, despite considerable access to impervious roof areas well in excess of that available for the Sports Precinct. It is recommended that roof water harvesting particularly for the Recreational Hub and Institutional Precinct be further considered and appropriate detail provided to assess its viability as a potential option.</p> <p>69. The WSUD strategies do not appear to adequately consider the base flows of Eastern and Bungarribee Creeks. Maintenance of these base flows should be a primary target of the development, in addition to the targets for reducing the impacts of peak flows.</p> <p>The impact on the reduction of base flows and infiltration recharge of groundwater caused by controlling stormwater discharge and stormwater harvesting be appropriately considered.</p> <p><u>Vegetation</u></p> <p>70. The Concept Plan and Environmental Assessment Volume 1 does not appear to accurately describe the vegetation on site and the legislative framework in which it sits. The vegetation communities and their protection status as described in the Ecological Impact Assessment should be used.</p> <p>71. There is a risk that vegetation offsets could be used to supplement areas where public funds are already being applied for conservation and management. It is recommended that offsetting onto public lands be avoided where possible and if offsetting occurs on public land that caution be applied to ensure no double accounting.</p> <p>72. There is insufficient information provided to assess the potential impact of the Asset Protection Zones. It is recommended that the impact on adjacent bushland and biodiversity be quantified appropriately including loss of vegetation and potential impacts in increase in edge effects through vegetation clearing or maintenance of the Asset Protection Zone.</p> <p>73. Insufficient consideration of the management authority for the Asset Protection Zone. It is recommended that factors such as lack of maintenance and its potential impacts on bushfire risk be considered.</p> <p>74. Insufficient consideration of the area of high ecological constraint in the northern part of the proposed development. The Sydney Metropolitan Catchment Management Authority in their Offsetting Guidelines (2005) recommend that for areas of high conservation significance development is unlikely to be approved and that consent to clear should only be given where there is overwhelming socio-economic benefit, is of state significance and where the impact is unavoidable. The approach for development is to avoid, mitigate and then offset. Conserving this area would result in a loss of approximately 30 lots (four per cent reduction in lot yield), which could be mitigated by modifying lot design. The decision to develop this area does not appear to be based on sound ecological principles and there is limited justification provided explaining why this impact could not be avoided.</p> <p>75. Insufficient alternative mitigation strategies in place in the event that the offset or the grass translocation trials are unsuccessful. It is</p>	<p>provided with future applications.</p> <p>67. The almost entirely developed upstream urban catchments ensure that flow will be maintained in the creek systems following any rain event. The focus of the strategy has been to protect the downstream waterways from the resulting storm flows using detention structures. The proposed structures and treatment areas do not operate as stormwater harvesting dams but are configured to discharge by matching critical predevelopment peak flows. The interface bio-retention systems can be configured to discharge sufficient stormwater, both as subsurface and surface flows, to mimic the predevelopment hydrology.</p> <p>68. Future uses in the Recreational Hub and Institutional Precinct were not available to enable modelling rainwater tank usage as was done for the Sports Precinct. Limiting the impervious areas (e.g.: through selection of car parking surfaces) is seen as a particular opportunity for this precinct.</p> <p>Stormwater management of the development will encompass both water quality and hydrology (with harvesting and reuse) to maintain predevelopment flows.</p> <p>69. The extent of urban and industrial development within the catchments of Bungarribee and Eastern Creek has been significant. As a result the storm flows following rain are significantly increased, and infiltration and baseflow across the catchment has been reduced. As demonstrated through the Doonside development, it is recommended that peak flows be managed to protect the geomorphology of the waterways. It is impossible to recreate the base flows through infiltration at the interface of a development to replicate the predevelopment pervious areas. Where possible natural drainage lines should be identified and the predevelopment hydrology maintained.</p> <p><u>Vegetation</u></p> <p>70. Ecological issues are considered to have been adequately addressed, this is supported by the ecological investigations carried out. The loss of high conservation value vegetation is acknowledged and assessed. These impacts have been considered and the proposal meets the 'maintain and improve test' under Part 3A of the EP&A Act. The loss of this vegetation will be offset against areas that will be revegetated, regenerated, restored, and enhanced. These offsets will create a more sustainable habitat corridor, because they have been strategically placed to further enhance the riparian zone and habitat corridor as envisaged within the Western Sydney Parklands Management Strategy.</p> <p>71. It is envisaged that offset implementation will be done in coordination with the Western Sydney Parklands Trust and the Department of Environment and Climate Change in order to avoid double accounting.</p> <p>72. Development that will occur within the Doonside Residential Precinct will undergo further assessment at future application and will meet the requirements under S.100B of the Rural Fire Services Act & 79BA of EP& Act.</p> <p>The bushfire assessment highlights the APZ's required for boundaries and details requirements for special uses in accordance with Planning for Bushfire Protection (2006).</p> <p>73. As indicated in Section 8.3.2 of the Western Sydney Parklands Ecological Impact Assessment, APZ's management issues will be addressed and further detailed as part of the proposed Site Management Plan.</p> <p>74. See response to (70) above.</p> <p>75. A commitment has been made to a Site Management Plan which will identify alternative mitigation measures to be adopted by future project applications.</p> <p>76. Edge effects will be attenuated partially through the provisions described in the ecological controls described in the DCP which prescribes the management of the urban/bushland interface. Further the marked increased in environmental management activities planned by the proposal will decrease current edge effect pressures.</p> <p>Currently there are a number of access roads and trails that intersect the</p>

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				<p>recommended that clear strategies with set targets and monitoring programs be established and that these strategies be complemented by alternative actions in the event the are unsuccessful.</p> <p>76. Insufficient consideration of the exposure of edge effects. The potential impacts and offsets required have been underestimated. It is therefore recommended that the increased impact of edge effects not only as a result of removal of vegetation but also the introduction of impacts through the proposed development be considered and if appropriate incorporated into the calculations for offsetting.</p> <p>77. Proposed offsetting ratios used appear to be considerably lower than that used and recommended in other offsetting strategies. Offsetting ratios in the Sydney Metropolitan Catchment Management Authority Offsetting Guidelines (2005) or Liverpool Biodiversity Strategy (developed by Eco Logical Pty Ltd) should be reviewed and considered.</p> <p>78. The offsetting strategy and ratios proposed do not adequately consider the ecological risks from time lags. Thus any time lags between removing and replacing habitat function should be factored into the specification of offsets.</p> <p>79. Potential impacts on the vegetation and risks do not appear to have been considered in relation to local and regional conservation and protection targets for ecological communities. It is recommended that the potential impacts of clearing the vegetation and risks associated with offsetting be further investigated and percentage loss of vegetation (quantity and quality) be considered in a local and regional context.</p> <p>80. Council objects to the residential development (of approximately 30 lots) of land in the north-western corner of the Doonside Residential Precinct where the loss of vegetation of high conservation significance and 2 known species of threatened animal would result. There is no justification for impacting on this area and it is considered that the 30 lots could be compensated by way of a minor subdivision redesign.</p> <p><u>Development in the Core Riparian Zone</u></p> <p>81. Recommendations of the former NSW Department of Natural Resources in their Watercourse and Riparian Area, Planning, Assessment and Design version 4 (2004) and the Sydney Metropolitan Catchment Management Authority in their Managing Watercourse and Riparian Areas (2005) have not been considered.</p> <p>82. The Proposal locates the stormwater detention basins within the 20 metre core riparian zone. Any further pedestrian and cycle paths may also be located within this core riparian zone due to the proximity of the development to the creek line. A 20m core riparian and 10 metre buffer area totalling 30 metres in total as measured from the top of bank should be maintained. Likewise limits on development within the core riparian and buffer zones be in accordance with the NSW Government Guidelines.</p> <p><u>Traffic</u></p> <p>83. Several issues need to be addressed in the TMAP these are:</p> <ol style="list-style-type: none"> alternative arrangements need to be provided to allow safe pedestrian movements into the Precinct should the RTA not support the proposed three mid-block signalised crossings; pedestrian fencing is required to stop pedestrians crossing roads fronting the Precinct; and 	<p>remnant vegetation causing edge effects in more than one area. Some of these areas have been included within the Doonside Residential area, and others are included as part of the offsets for restoration and enhancement. The edge effects have not been considered in the offset ratios, given that the edge impacts are seen to be negligible given the edge effects that already exist.</p> <p>It is expected that the attention to the site will be received through active bush regeneration and control of weeds (which is currently non-existent will assist in combating edge effects).</p> <p>77. The offset ratios used were negotiated with the NSW Government, in particular the Department of Environment and Climate Change (DECC), and Department of Planning (DoP). There were several sources reviewed to develop the offset principles, including the Liverpool Biodiversity Strategy, NSW Government's <i>Green Offsets for Sustainable Development Concept Paper</i> (2002), and the NSW Department of Natural Resources <i>Native Vegetation Regulation 2005: Environmental Outcomes Assessment Methodology</i> (2005) to develop the principles utilised in the project.</p> <p>78. See responses 70 and 71 above.</p> <p>79. The local and Parkland context of the vegetation clearing has been taken into account. The regional percentages of each community can also be documented if required. However, these offer little strategic value due to the incredible low numbers in question. The offset areas that will be regenerated, restored, and enhanced have been strategically placed to improve, and maintain the existing corridor linkages between areas within the locality and regionally within the Parklands. This is consistent with the parklands management vision.</p> <p>80. The impacts on Cumberland Plain Woodland vegetation to the north of the site have been investigated. as required by the <i>Environmental Protection and Biodiversity Conservation Act</i> a referral was submitted to the Commonwealth Department of the Environment and Water Resources. On EPBC reference 2007/3718 dated 12 October 2007, The Department decided that the proposed action is not a controlled action and, as such, does not require assessment approval by the Minister. Additional Cumberland land snail and micro bats surveys were also undertaken. These surveys concluded that the impacts are not likely to pose a significant impact on these population.</p> <p><u>Development in the Core Riparian Zone</u></p> <p>81. The Concept Plan has been discussed extensively with the Department of Environment and Climate change (former DNR) who is supportive of the proposal and has not raised any issues with the proposed treatment of the riparian zones.</p> <p>82. See 81 above. The water quality controls for the development are generally provided for through the eco-medians, street trees and the interface bio-retention systems. Wetlands and detention areas to manage flows from the existing external urban catchments are proposed in the upstream sections of the waterways on site. These areas are within the riparian zones, but provide for external catchments where there is no space available to retrofit treatment and detention.</p> <p>Within the floodplain, detention ponds are proposed which are not entirely within the riparian zone. The intent of the strategy is to protect the waterways and riparian areas.</p> <p><u>Traffic</u></p> <p>83. Landcom has agreed to signalised intersections and associated upgrading works at Eastern Rd, Douglas Road and Bungaribee Road. This will remove the need for the mid-block pedestrian crossings and fencing.</p> <p>RTA has agreed to three access points.</p>

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				<p>iii. Council previously recommended reducing the number of access points from 3 to 2, and signalling these access points.</p> <p><u>Intersections of Doonside Road / Bungarribee Road and Doonside Road / Eastern Road</u></p> <p>84. Modified roundabouts at the abovementioned locations would perform within an acceptable level of service during the AM peak, it remains a concern that pedestrian safety would be compromised as many pedestrians may cross at these intersections due to the fact that these intersections provide direct routes to the existing facilities (schools and shopping centre) in the vicinity of the residential precinct. Unless there is a pedestrian fence to stop pedestrians crossing these roads, people will cross wherever they feel convenient.</p> <p>85. Intersection performance assessment was only undertaken for the AM peak period. It should however be noted that some intersections are critical at the PM peak, particularly Doonside Road / Bungarribee Road as there exists a free left turn lane for inbound vehicles from Doonside Road to Eastern Road which provides an unimpeded flow to PM traffic. In the proposal that free left turn lane will be removed in order to create the fourth leg to the intersection to provide access to the Precinct. The impact of this change for PM traffic should be assessed.</p> <p>86. All access to the Precinct should be signalised and should the cost of signalisation be a concern then the applicant may consider reducing the number of access points servicing the Precinct.</p> <p><u>Doonside Residential Precinct Access Points</u></p> <p>87. It is unclear why three access points located at Douglas Road, a reduction in the number of access points would save \$3.5million which could be used to signalise the remaining 2 access points.</p> <p>88. The provision of 4 sets of signals and 3 roundabouts over a relatively short section of a Regional Road is an undesirable outcome.</p> <p>89. Crossings between Bungarribee Road and Douglas Road; Bungarribee Road and Doonside Road.</p> <p>90. It is very difficult to justify mid-block signalised pedestrian crossings. As previously mentioned, the TMAP fails to provide alternative arrangements for safe pedestrian movements should the RTA not support the proposed 2 mid-block signalised crossings.</p> <p>91. A third pedestrian signalised pedestrian crossing has been proposed to connect the Parklands to Doonside Station without creating a pedestrian route through the residential development. Our understanding is that this crossing point will not be used by precinct residents to gain access to facilities north of Eastern Road because this pedestrian crossing links the Parklands shared path to the Nurragingy Recreational area. This new crossing point also requires the RTA's approval as it will be a signalised pedestrian crossing.</p> <p>92. Should the RTA approve signalised crossing points, consideration should be given to improve pedestrian crossing facility at the intersection of Bungarribee Road / Rosenthal Street in order to provide safe crossing point to the shopping centre. Consideration should also be given to the inclusion of pedestrian overpasses across Eastern Road and Doonside Road.</p> <p><u>Walking Distance</u></p> <p>93. Any additional distance for residents living at the very north of the site to walk to the station and schools could be seen by some users as inconvenient and would discourage them to use the proposed crossings points.</p> <p><u>Pedestrian and Cycle Network</u></p> <p>94. Suggested a shared pedestrian / cycle link be established between the Precinct and the Western Sydney Parklands Cycleway to the west of the Precinct.</p> <p><u>Public Transport and its Promotion</u></p> <p>95. Concerns regarding the effectiveness of incentives mentioned in the</p>	<p><u>Intersections of Doonside Road / Bungarribee Road and Doonside Road / Eastern Road</u></p> <p>84. Landcom has agreed to signalised intersections and associated upgrading works at Eastern Rd, Douglas Road and Bungarribee Road. This will remove the need for the mid-block pedestrian crossings and fencing.</p> <p>RTA has agreed to three access points. See response to (83) above.</p> <p>85. See response to (83) above.</p> <p>86. The VPA has been amended to reflect the proposed traffic works to be provided at Landcom's expense.</p> <p><u>Doonside Residential Precinct Access Points</u></p> <p>87. Landcom has agreed to signalised intersections and associated upgrading works at Eastern Rd, Douglas Road and Bungarribee Road. This will remove the need for the mid-block pedestrian crossings and fencing.</p> <p>RTA has agreed to three access points.</p> <p>88. See response to (87) above.</p> <p>89. See response to (87) above.</p> <p>90. See response to (87) above.</p> <p>91. Noted.</p> <p>92. See response to (87) above.</p> <p><u>Walking Distance</u></p> <p>93. Landcom has agreed to signalised intersections and associated upgrading works at Eastern Rd, Douglas Road and Bungarribee Road. This will remove the need for the mid-block pedestrian crossings and fencing, whilst providing a safer and shorter route to the train station, local shops and schools.</p> <p><u>Pedestrian and Cycle Network</u></p> <p>94. Pedestrian / cycle facilities will be provided between the residential development and the Parklands.</p> <p><u>Public Transport and its Promotion</u></p> <p>95. The Travel Pass incentive would be a one off basis to encourage public</p>

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				<p>Personalised Travel Plan section, particularly “Four weekly travel passes per household” (refer page 53 of TMAP). It is not clear how long this incentive will be provided.</p> <p>96. Concern regarding the provision of cycle parking facilities at railway stations, however does not identify the stations and whether cycle parking facilities can be accommodated there.</p> <p><u>Road Hierarchy and Road Cross Sections</u></p> <p>97. Concerns are raised regarding road hierarchy including:</p> <ol style="list-style-type: none"> the proposed eco-medians and resulting one-way system; laneways (rear access streets); and narrow local streets. <p>98. Object to the proposed laneways (rear access streets) and narrow local streets on the traffic management view point as it would be difficult for 2 vehicles to pass each other when a vehicle is parked in narrow streets. Should narrow streets within this Precinct be approved, these streets should be community title roads (private ownership).</p> <p>99. Some road cross sections are not complying with Blacktown DCP Part A and Engineering Guide to Development. The example of these is local street along the Park Edge and Minor Local Street. Council does not support these carriageway widths, and a 9.0m wide carriageway is required as per Council's Engineering Guide to Development and DCP Part “A”.</p> <p>100. All street cross sections should comply with Blacktown DCP Part A rather than developing a new standard as proposed in Table 1 on page 36. All references to a Parking Lane width of 2.3m should be deleted from Table 1 as well as from Figures 17, 18, and 19.</p> <p><u>Intersection Control</u></p> <p>101. In regards to 4-way intersections, request:</p> <ol style="list-style-type: none"> Consideration of no access from the Bungarribee Road / Doonside Road intersection to the Precinct, and no change to the existing roundabout; Installation of traffic signals at the Doonside Road / Eastern Road intersection to provide access to the Precinct; Signalised pedestrian crossing between Bungarribee Road and Douglas Road be removed; Should the abovementioned signalised crossing points be approved by the RTA, consideration should be given to improve the pedestrian crossing facility at the intersection of Bungarribee Road / Rosenthal Street; and Pedestrian fencing should be provided on the median along Doonside Road and Eastern Road to stop pedestrians crossing roads fronting the Precinct. <p>102. Council objects to the inclusion of narrower roads widths than provided for within Blacktown DCP 2006. Precinct roads should be designed and constructed to Council standards and in compliance with the current Blacktown DCP and Engineering Guide to Development.</p> <p>103. All 4-way intersections within the internal road network should have some form of control i.e., a give-way, stop, roundabout or traffic signals.</p> <p>104. A full pavement design should be prepared by a qualified geo-technical engineer incorporating the impact of WSUD. The pavement design should have the water-table level below the sub grade to prevent water entering the road pavement.</p> <p>105. Delineation of the road (kerbs, bollard, traffic reflectors etc) must be provided to separate vehicular traffic, footpath and pedestrian traffic for safety reasons.</p> <p><u>Site Audit Report for the Former Telstra OTC</u></p> <p>106. The Former Telstra site encompasses only part of the proposed Western Sydney Parklands, namely ‘Parklands Precinct 2’ (that North of the Great Western Highway). As such the findings of the Site Auditors report remain</p>	<p>transport use.</p> <p>96. Landcom can confirm that bicycle facilities will be provided at Doonside Railway Station.</p> <p><u>Road Hierarchy and Road Cross Sections</u></p> <p>97. The proposed road hierarchy and road dimensions have been fully justified the Environmental Assessment, Development Design Code and Preferred Project Report.</p> <p>98. See response to (97) above.</p> <p>99. See response to (97) above.</p> <p>100. See response to (97) above.</p> <p><u>Intersection Control</u></p> <p>101. Landcom has agreed to signalised intersections and associated upgrading works at Eastern Rd, Douglas Road and Bungarribee Road. This will remove the need for the mid-block pedestrian crossings and fencing. RTA has agreed to three access points. See response to (87) above.</p> <p>102. The majority of roads will meet or exceed Council's road dimension requirements as required by Council's Engineering Guide to Development. The departures from local requirements is justified having regard to improved landscaping and pedestrian safety outcomes.</p> <p>103. Intersections will be treated according to their performance levels. Future traffic assessments will confirm detailed design as required by the Statements of Commitment.</p> <p>104. Noted. Will be addressed through future project applications and detailed design.</p> <p>105. Noted. See response to (104) above.</p> <p><u>Site Audit Report for the Former Telstra OTC</u></p> <p>106. Section 7.6 and Appendix F (Vol 2) of the EA conclude that the site is suitable for the proposed land uses. Notwithstanding this, future project applications will need to continue to satisfy SEPP 55 requirements. Any necessary</p>

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				<p>applicable only to this area and not the entire Bungarribee Precinct.</p> <p>107. The area south of the Great Western Highway, including the 'Huntingwood West Employment Lands', 'The Wetlands', 'The Commercial/Recreation Zone' and part of the 'Production Based Landscape Zone' are not covered by the Site Audit Report. Further, it is not clear whether any form of Environmental Site Assessment has been undertaken within this area of the Bungarribee Precinct.</p> <p>108. The Land Capability Assessment makes reference to the Site Auditors report, however it is the only document presenting a study of the entire Bungarribee Precinct.</p> <p><u>Report on Land Capability Assessment</u></p> <p>109. The Land Capability Assessment failed to undertake a detailed groundwater study. Based on similar local studies, the site is likely to hold brackish to saline groundwater, unsuitable for irrigation.</p> <p>110. A detailed groundwater study of the area should be undertaken should there be any proposal to irrigate with groundwater.</p> <p>111. The soil and water management plan will need to address methods of minimising water pollution due to the erosion of soils or the development of saline conditions, reducing or managing salinity to provide acceptable conditions for building and revegetation works; minimisation of soil erosion during and after construction; and maximisation of the re-use of materials on site.</p> <p>112. Engineering and land management practices will need to be implemented in order to ensure erosion is effectively managed during the operational phase.</p> <p>113. The following would need to be undertaken during the construction phase:</p> <ul style="list-style-type: none"> i. a contamination management plan; ii. detailed environmental investigation (comprising subsurface sampling and laboratory testing); iii. remediation and validation monitoring subject to a Remediation Action Plan to ensure that areas are appropriate for their intended use; iv. salinity risk areas identified within the report will need to contain at least 1 permanent monitoring bore per risk area identified within the report; and v. detailed geotechnical investigations will need to be undertaken on a stage by stage basis to determine pavement thickness based on salinity risk areas. <p>114. These matters will be conditioned by Council during the subdivision and development stages of the development.</p> <p><u>WSUD Strategy</u></p> <p>115. Advises the Quakers Hill Sewage Treatment Plant has not yet been finalised.</p> <p><u>Development Design Code</u></p> <p>116. Further information is requested in relation to the quoted size of the proposed Neighbourhood Centre being approximately 300sqm gross. Council requests consideration be given to increasing the gross floor area to achieve the desired objectives.</p> <p>117. In principle agreement with the proposal for a Community Centre to be located close to the Douglas Road and Doonside Road intersection as part of the Heritage Park.</p> <p><u>Voluntary Planning Agreement</u></p> <p>118. In principle support for the Development Contributions outlined in Schedule 2, with a commitment to further discussions and negotiations.</p> <p><u>Social Sustainability Study</u></p> <p>119. In principle agreement that there is sufficient spare capacity in existing</p>	<p>remediation will be undertaken prior to commencement of works related to specific project applications as confirmed by the revised Statement of Commitments.</p> <p>107. Detailed investigations will be undertaken as part of future project applications (see Statement of Commitments).</p> <p>108. Noted.</p> <p><u>Report on Land Capability Assessment</u></p> <p>109. Detailed investigations will be undertaken as part of future project applications (see Statement of Commitments).</p> <p>110. See response to (109) above.</p> <p>111. Noted. See response to (109) above.</p> <p>112. Noted. See response to (109) above</p> <p>113. Noted.</p> <p>114. Noted and agreed.</p> <p><u>WSUD Strategy</u></p> <p>115. Noted.</p> <p><u>Development Design Code</u></p> <p>116. The VPA at this stage reflects the concept plan nature of the proposal, further details will be provided as part of the negotiations that will take place during the detail design stage.</p> <p>117. See response to (117) above.</p> <p><u>Voluntary Planning Agreement</u></p> <p>118. The VPA at this stage reflects the concept plan nature of the proposal, further details will be provided as part of the negotiations that will take place during the detail design stage.</p> <p><u>Social Sustainability Study</u></p> <p>119. Noted.</p>

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				<p>schools and childcare services to meet the needs of the incoming population.</p> <p>120. In principle support for the proposed community centre for existing and future populations to be combined onto 1 site within the Bungarribee House heritage site, and suggest the following strategies:</p> <ul style="list-style-type: none"> i. confirmation of a consultation process with Doonside South residents; ii. confirmation of a decision-making process regarding provision and siting; and iii. determination of design specifications, cost estimates, funding details and timing of delivery. <p>121. Suggest there should be a focus on engaging young people in meaningful civic participation that includes an expansion of activities rather than just those around bush regeneration. Council considers this to be an opportunity to look at public art projects, music projects, and after hours activities. It will also be important to look at involving young men, as well as indigenous young people.</p> <p><u>Public Art</u></p> <p>122. Supports the Development Vision outlined in Section 1.3 that seeks to integrate public art into the streetscapes, open spaces, heritage precinct and Parklands perimeter, as well as the public art and place-making provisions outlined in Section 3.5.6. In addition, Council encourages and supports community participation by giving opportunity to local and Western Sydney artists in development of the public art design concepts.</p> <p>123. More information is requested on the contribution value towards public art outlined in clause B14.</p> <p>124. In reference to Section 2.3 Population Needs and Attitudes, Section 3.9 Community Development Strategy, and Section 4.1.3 Promoting Residents' Health and Wellbeing, Council would like to see and strongly encourage community participation and engagement through a community cultural development approach, in partnership with Council.</p> <p>125. The report is endorsed, and it is requested that Council be involved in further development and implementation of the public art strategy. In addition, it is recommended that an appropriate budget be set aside for achieving all the expected outcomes for public art development within these precincts.</p> <p>126. Council should be a third party to the draft agreement as there will be land dedications and handover of works to Council. No land dedications to Council can occur unless Council is a party to the agreement. The land dedications nominated in the draft agreement for open space are consistent with the rates levied on open space in Council's Contributions Plan for the Parklea Release Area based on the anticipated population, and are therefore endorsed.</p> <p>127. The first defects liability period should be 365 days not 180 days as per normal Council practice.</p> <p>128. Landcom has previously indicated to Council that they would consider a monetary contribution for "external works" for items outside the Precinct. No monetary contribution of this type is listed in the draft VPA. Landcom was requested to consider contributions towards works such as the upgrade of Doonside Public School, Doonside Railway Station lift and Kareela Reserve amenities block.</p> <p>129. It is acknowledged that Mr Kerry Robinson of Landcom gave an undertaking at the presentation to the Policy Committee of Council that the NSW Government would include in the VPA the provision of \$800,000 towards the provision of supporting facilities within Kareela Reserve and the provision of 2 signalised intersections in lieu of roundabouts on Doonside Road. It is therefore requested that the draft VPA be amended to include these matters.</p> <p>130. The contributions need to be more specific in nature.</p> <p>131. There appears to be scope for a VPA between Landcom and Council in the future to implement the proposed agreement (4.3.1). It is unclear</p>	<p>120. The VPA at this stage reflects the concept plan nature of the proposal, further details will be provided as part of the negotiations that will take place during the detail design stage.</p> <p>121. Noted.</p> <p><u>Public Art</u></p> <p>122. Noted.</p> <p>123. The VPA at this stage reflects the concept plan nature of the proposal, further details will be provided as part of the negotiations that will take place during the detail design stage.</p> <p>124. Noted and agreed. The Statements of Commitment provide for ongoing consultation.</p> <p>125. Noted. See response to (123) above.</p> <p>126. The current VPA is proposed to be executed between Landcom and the Minister for Planning as the principal VPA to outline the framework for infrastructure provisions. It is intended that subsequent agreements or other appropriate arrangements would be made for future applications between Landcom or the future developer and Council.</p> <p>127. A 180 defects liability period is considered appropriate for the VPA between Landcom and the Minister for Planning.</p> <p>128. The VPA has been revised to incorporate an \$800,000 contribution to facilities at Kareela Reserve.</p> <p>129. See response to (128) above.</p> <p>130. See response to (123) above.</p> <p>131. See response to (123) above.</p>

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				<p>whether this will happen.</p> <p><u>General</u></p> <p>132. Consideration should be given to:</p> <ul style="list-style-type: none">i. the impact of the Recreation Hub on the Rooty Hill amphitheatre as a competing outdoor event centre;ii. the impact of private use of the Recreation Hub and the Production Based Landscape Zone within the Bungarribee Precinct;iii. the possibility of the ice arena and/or expanded indoor sport facility to take into account Council's Strategic Vision.iv. Request the outstanding studies and reports referred to in this submission be made available to Council as soon as possible.v. Request Area 7 (being the Future Commercial/Recreation Zone) as shown on the Concept Plan for the Parklands be amended such that the commercial development elements are removed.vi. Request consideration be given to the inclusion of Botanic Gardens within the Parklands Concept Plan.vii. The Minister for Planning, be requested to honour the NSW Government's, and the previous Minister for Planning's, written undertaking to the Council that Nurragingy Reserve would be transferred into Council's ownership. <p>133. Recognised that some of the comments outlined within this section can be addressed through conditions imposed on the Concept Plan approval, which would be enforced through future Development Applications.</p>	<p><u>General</u></p> <p>132.</p> <ul style="list-style-type: none">i. Future applications will be fully justified and explore impacts on adjoining and surrounding development;ii. as above;iii. as above.iv. Since the Part 3A application was first submitted to DoP in September 2007 additional ecological surveys have been undertaken including: Cumberland Land Snail and Microchiropteran and Megachiropteran Bat Survey. Both reports recommend a number of measures to reduce potential impacts on resident species. A copy of these reports has been appended to the PPR.v. The proposal is for a concept plan only. Future uses able to create revenue for the Parklands are required to cover operational, and maintenance costs of the Parklands. Future applications will need to justify any proposed uses.vi. as above.vii. Noted. <p>133. Recognised that some of the comments outlined within this section can be addressed through conditions imposed on the Concept Plan approval, which would be enforced through future Development Applications.</p>	
4	27 Mar 08	Ministry of Transport GPO Box 1620 SYDNEY NSW 2001	Object	<ul style="list-style-type: none">1. MoT has previously provided comment on the Doonside Transport Management and Accessibility (TMAP) for the Bungarribee Precinct – Western Sydney Parklands Doonside. MoT to be advised of how their comments on the TMAP were considered in finalising the project documentation.2. The Draft Voluntary Planning Agreement should be reviewed against the Department's Infrastructure Contributions Plan Circular (PS07018).3. The proposed contribution to public transport infrastructure does not take into consideration the need for the additional bus services to the proposal over time.4. MoT would appreciate an opportunity to review the bus transport infrastructure needs of the proposal and recommend a contribution toward Start-up Bus Services.5. MoT request continued close consultation regarding the Draft Voluntary Planning Agreement.	<ul style="list-style-type: none">• Transport	<ul style="list-style-type: none">1. MoT's earlier comments have been responded to as follows:<ul style="list-style-type: none">i. Landcom notes the State Plan now includes transport related priorities;ii. The Concept Plan proposes the creation of pedestrian / cycle paths linking the development to existing public transport infrastructure, local schools and shops. Pedestrian / cycle networks will also be provided to the Regional Parklands;iii. NSW Government's Planning Guidelines for Walking and Cycling will be addressed during the detailed design of future applications.iv. Pedestrian crossings have been incorporated into the new signalised intersections. The existing pedestrian crossing at the Doonside Road / Douglas Road intersection will be retained and improved with the provision of an additional arm into the development.v. The Landscape Master Plan addresses cycling impacts and opportunities.vi. The development proposes to contribute to the improvement of cycle parking facilities at Doonside Rail Station.vii. The cycle network facilities (including dimension, facilities, etc) will be provided during the detailed design of future applications.viii. The VPA commits to 3 bus stops and Section 8.4 of the TMAP also includes bus related infrastructure.ix. Connections to cycle paths have been provided at strategic locations to the existing network to achieve optimal planning outcomes. These include over Bungarribee and Eastern Creeks and new crossings at the signalised intersections.2. Noted.3. Noted.4. The Statements of Commitment provide for on-going consultation.5. See response to (4) above.
e5	16 Apr 08	NSW Heritage Office Locked Bag 5020 PARRAMATTA MSW 2142	Object	<ul style="list-style-type: none">1. Support the proposal and consider it has many positive aspects such as the retention of open space in the 'core heritage area' of greatest significance and an open space link with the Parklands Precinct.	<ul style="list-style-type: none">• Heritage	<ul style="list-style-type: none">1. Noted.2. Noted.

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				<p>2. Majority of both the Residential Precinct and the Parklands Precinct is listed on the State Heritage Register as the remnant of a large and important early colonial farm, a type of heritage item or landscape now rare in New South Wales and Sydney.</p> <p>3. The site also has potential to retain the layout and fabric of a formal 1832 (kitchen/ vegetable) garden and orchard north of the homestead complex which is another element of high heritage significance.</p> <p>4. A plan noting the formal 1832 (kitchen/ vegetable) garden in relation to the house was given to the project consultants early in the consultation process but was not included in the 2007 Conservation Management Plan, archaeological testing programme or the 2007 Heritage Impact Statement.</p> <p>5. Suggest the following draft conditions of consent are provided for consideration and inclusion in any approval should the Department consider it appropriate:</p> <ol style="list-style-type: none"> The Proponent should prepare a Non-Indigenous Heritage Management Plan (HMP) in consultation with the Heritage Council of NSW as part of preparing a Construction Environmental Management Plan. The HMP shall include details of all procedures to be implemented during construction works in relation to protecting and conserving non-Indigenous heritage items including known and potential archaeological resources which are noted to exist in a number of locations. The HMP shall include more detailed research (including of archaeological potential of the formal 1832 Bunbarribee (kitchen/vegetable) garden and orchard north of the homestead complex (referred to in item (3) below) and other investigations that have been undertaken for each identified heritage item which will be negatively affected by the proposal and address specific impacts arising from more detailed design development and shall provide mitigation and management measures for those impacts, including those listed in the 2007 Heritage Impact Statement section 7 & section 8. In preparing the HMP and subject to the results of further research and archaeological testing indicating the survival and/or archaeological potential of the formal 1832 garden and orchard north of the homestead complex, the Proponent shall: <ul style="list-style-type: none"> assess the heritage significance of the formal 1832 garden, given the rarity of formal kitchen gardens in colonial New South Wales and the Sydney region; prepare conservation recommendations for the formal 1832 garden; alter the proposed formal row of street trees along the inside of this section of Douglas Road contiguous with the 'core heritage area' (within Stage 5 of the Staging Plan) to have a more informal 'copse' character to create a less formal public open space better protecting the archaeological potential identified in the 2007 Heritage Impact Statement and revised landscaping that better interprets it as the core of a former working farm, in contrast to adjacent development; avoid tree plantings within any of the specified significant views or visual links identified in figures 4.15, 4.17, 4.8 and 7.1 of the 2007 Conservation Management Plan; specify the form, content and design of the potential Community Facility which, in accordance with the 2007 Conservation Management Plan, shall be located outside the 'core heritage area' in one of two locations in figure 7.2; revise relevant sections of the Development Code including Urban Structure (fig. 11), revised proposed density (section 3.2.1), ensuring further single storey housing adjoining the proposed public open space (fig. 13), Conservation & Natural Values (fig. 14), Landscape Framework (fig.15), Road hierarchy (fig.16) and Frontage Diagram (fig.24) and in 	<p>3. Further archaeological investigations have been commissioned since lodgement of the Environmental Assessment for exhibition to confirm any additional significant relics, including the kitchen gardens. Statements of Commitment have been drafted that obligate Landcom to detailed excavation works to record and archive any identified archaeological relics.</p> <p>4. See response to (3) above.</p> <p>5. In response to the Heritage Council's recommended conditions of approval:</p> <ol style="list-style-type: none"> Disagree. The archaeological investigations undertaken since lodgement of the Environmental Assessment conclude there are no archaeological relics that require retention or protection. Any significant relics will be recorded for archiving purposes. Disagree. See response to (3) above. Disagree. See response to (3) above. <p>Reconsideration of the proposed trees species to be located adjacent to the Bungarribee Homestead curtilage will be undertaken to determine a more appropriate species that will better retain views and vistas to the curtilage area. This commitment has been incorporated into the Statements of Commitment.</p> <p>The CMP makes adequate provision for the community centre and will be subject to further discussion with Blacktown City Council.</p> <p>Site Interpretation and Public Art Strategies have been committed to, as has a Public Domain and Landscaping Strategy.</p> <p>6. See response to (3) above.</p> <p>7. See response to (3) above. Further, the proposal is for a Concept Plan only at this stage and no physical works are proposed.</p> <p>8. See response to (7) above.</p> <p>9. Noted. The Statements of Commitment have been revised to ensure photographic and archival recording is undertaken in accordance with accepted practices.</p> <p>10. Disagree. See response to (3) above.</p> <p>11. A copy of the archaeological assessment undertaken to date is attached to the Preferred project Report.</p> <p>12. Disagree. Sections 7.1.5, 7.4 and Appendix D comprehensively address the heritage issues associated with site. The recommendations within the Conservation Management Plan prepared for the site have been incorporated into the proposal's design and reinforced through the statement of commitments. Further, the Bungarribee Homestead curtilage covers an area of approx. 3.39ha. The curtilage has been identified in consultation with the NSW Heritage Office and is considered appropriate for the nature of the footings that remain on the site.</p> <p>The subdivision plan is a direct response to the protection of significant heritage views. The proposed curtilage is considered appropriate for the footings that remain. The Development Design Code seeks to ensure a cohesive and visually pleasing residential precinct which acknowledges the historic uses on the site and remaining footings, addresses height limitations. and includes cross sections to demonstrate the proposed heights are appropriate.</p> <p>Further archaeological investigations are being undertaken in areas of high archaeological significance and the Statements of Commitment have been revised to record and archive archaeological remnants.</p> <p>A commitment has been made to the preparation of a Site Interpretation Strategy.</p>

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				<p>response to the recommendations of the HMP required in (1-3) above;</p> <ul style="list-style-type: none"> outline proposed interpretation actions and works throughout both the Parklands and Doonside Precincts to interpret natural and cultural heritage values to residents and visitors, including how and where the Doonside Public Art Strategy will be implemented in relation to the area's heritage values. This would appear to require revision of the Development Code section 3.5.6 controls to add another control – the 2007 Conservation Management Plan shall inform all public art works in relation to Heritage Park and Homestead View Park; outline policies and measures to manage open space and other elements of significance in the Residential Precinct post-construction. <p>6. Before submitting the 2007 Conservation Management Plan for endorsement by the Heritage Council of NSW, the Proponent shall consider revising the draft plan in line with (1-3) above to include:</p> <ol style="list-style-type: none"> assessing the significance of the formal c1832 Bungaribee (kitchen/vegetable) garden and orchard north of the homestead complex site; assessing the rarity of the existing remaining c379 hectare farmland as a surviving colonial farm in Western Sydney; and clarifying each time that significant views and visual links are mentioned that these are as defined in figures 4.15, 4.17, 4.8 and 7.1; <p>7. A specialist heritage manager or heritage consultant shall be nominated for the works. The consultant shall have appropriate qualifications and experience commensurate with the scope of the Major Project works. The name and experience of this consultant shall be submitted to the Director-General for approval prior to commencement of works. The heritage consultant shall advise on the detail design resolution of new works, undertake on-site heritage inductions, and shall inspect new works, design and installation of services (to minimise impacts on significant fabric and views) and manage the implementation of the conditions of approval for the project. A report by the heritage consultant (illustrated by works' photographs) shall be submitted to the Director-General for approval within 6 months of the completion of the works which describes the work, any impacts/damage and corrective works carried out;</p> <p>8. All construction contractors, subcontractors and personnel are to be inducted and informed by the nominated heritage consultant prior to commencing work on site as to their obligations and requirements in relation to historical archaeological sites and 'relics' in accordance with guidelines issued by the Heritage Council of NSW;</p> <p>9. Significant heritage items and built elements are to be adequately protected from potential damage during the works. Protection systems must ensure historic fabric is not damaged or removed;</p> <p>10. Photographic and archival recording of all affected heritage items, as identified in the specialist reports prepared as part of the Environmental Assessment for the project, is to be undertaken prior to the commencement of any construction activity. Recording is to be completed in accordance with the guidelines issued by the Heritage Council of NSW. Copies of these photographic recordings should be made available to the Heritage Branch, Department of Planning, the Local Studies Library and the Local Historical Society in the Blacktown Local Government Area;</p> <p>11. All affected historical archaeological sites of Local and State significance are to be subject to professional archaeological excavation and/or recording before construction works commence. This includes the formal 1832 garden site. A Research Design including an Archaeological Excavation Methodology must be prepared in accordance with Heritage Council guidelines for each site which is to be excavated. Those documents should be prepared for the approval of the Director-General, Department of Planning;</p>	

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				<p>12. After archaeological works are undertaken, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the Local Studies Library and the Local Historical Society in the Blacktown Local Government Area. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations. The information within the final excavation report shall be required to include the following:</p> <ul style="list-style-type: none"> i. An executive summary of the archaeological programme; ii. Due credit to the client paying for the excavation, on the title page; iii. An accurate site location and site plan (with a scale and a north arrow); iv. Historical research, references, and bibliography; v. Detailed information on the excavation including the aim, the context for the excavation, procedures, treatment of artefacts (cleaning, conserving, sorting, cataloguing, labeling, scale photographs and/or drawings, location of repository) and analysis of the information retrieved; vi. Nominated repository for the items; vii. Detailed response to research questions (at minimum those stated in the Department of Planning approved Research Design); viii. Conclusions from the archaeological programme: this information must include a reassessment of the site's heritage significance, statement(s) on how archaeological investigations at this site have contributed to the community's understanding of the Site and other Comparative Site Types and recommendations for the future management of the site; ix. Details of how this information about the excavations have been publicly disseminated (for example, include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the sites). <p>13. To conserve the Heritage values of the site it is recommended that the Department give consideration to the amendment of the scheme to require:</p> <ul style="list-style-type: none"> i. Deletion of housing lots and roads inside the semi-circular Douglas Road between the 'core heritage area' and the south of the ephemeral watercourse ('Southern Creek') to its immediate north; ii. Addition of further extents of single storey housing adjoining the proposed public open space of the 'core heritage area', to its west, north-east and south-east to retain important visual links (from Doonside Road and views west to the mountains) identified in figure 4.17 of the 2007 Conservation Management Plan; iii. Redistribution of the proposed residential density in line with (a-c) so that no housing lots are lost from the proposal. 		
		Lou Ewins Manager, Planning and Aboriginal Heritage Metropolitan Branch Department of Environment and Climate Change PO Box 668 PARRAMATTA NSW 2124		<ul style="list-style-type: none"> 1. It appears that the proposal will lead to the removal of over 12 hectares of native vegetation, including core habitat areas of endangered ecological communities (EEC), as well as threatened fauna habitat and approximately half of the only population on site of Grevillia juniperina species. 2. The clearance in these areas appears to be necessary for the economic viability of the proposal and because constraints such as flood plains, a major fibre optic cable and sewer mains prevent the use of other areas. The clearance has been offset by restoration work including replanting in other parts of the Western Sydney Parklands. 3. The DECC considers that any opportunities to further reduce clearance that occurs at the detailed design stage of the Doonside Residential Precinct should be considered. For example opportunities to increase the density of development in certain parts of the development site may enable larger lots to be provided in ecologically sensitive areas, thus enabling greater retention of EECs and fauna and flora habitat. 4. The proponent should also investigate the feasibility of transplanting any 	•	<ul style="list-style-type: none"> 1. The grevillia species will not be impacted by the proposed development footprint – refer to Figure 10 of the Ecological Assessment. 2. Noted. 3. Noted. 4. Refer to response to (1) above. 5. Additional surveys for Cumberland Plain Land Snail were recommended to be undertaken as part of the impact assessment process during concept design. This survey has since been completed and is attached. The results of the survey found that a small percentage of CPLS will require relocation and a Plan of Management to address translocation has been committed to in the Statement of Commitments (see Section 4 of the Preferred Project Report). 6. Noted. The Statement of Commitments have been revised to ensure relocation of the native grasslands complies with the relevant Guidelines.

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				<p>suitable specimens of Grevillia juniperina that would otherwise be destroyed. Any restoration proposed by the proponent should endeavour to restore the population of this species to predevelopment levels.</p> <p>5. Prior to any clearance occurring, any live specimens of the threatened Cumberland Snail should be located and transplanted to the nearest suitable habitat. In addition, a Cumberland land Snail Plan of Management should be developed to improve habitat adjacent to the development site.</p> <p>6. DECC notes that the Concept Plan includes a proposal to relocate some native grasslands. DECC recommends that this be done in accordance with the "Guidelines for Translocation of Threatened Plants in Australia" (Australian Network for Plant Conservation 2004).</p> <p>7. The offsetting proposed for clearance of vegetation is 2.1:1. This is towards the lower end of offsetting ratios that DECC has accepted in the past. However, the DECC acknowledges that in addition to the offset proposed, part of the proceeds from the Doonside Residential Precinct will be spent on ongoing management of fauna and flora within the Western Sydney Parklands. The long term benefits for fauna and flora of the proposal are, therefore, considered to outweigh the short term impacts.</p> <p>8. DECC also notes that the EA recommends further flora and fauna surveys be conducted for certain flora, the Swift Parrot and to determine location of infrastructure such as paths etc. This work still needs to be completed and consequent changes may be necessary to the project.</p> <p>9. Any areas of existing, enhanced or recreated habitat for threatened species or EECs should be protected through appropriate environmental protection zones or covenants to provide protection against any future potential expansion of recreational activities. DECC recommends the use of the Environmental Conservation E2 zone for this sort of purpose.</p> <p>10. The Shales of the area have known salinity associations and risks include generation of sulphates that produce both acidic and saline waters. Mapping and field inspections show that certain areas are subject to salinity and that houses nearby have been adversely affected by salinity. Other proposals in similar landscapes have created salinity. Stormwater systems (including swales and detention dams) and housing will therefore need to be carefully designed to avoid salinity related problems.</p> <p>11. Clay lining of structures in this area would have a high risk of failure due to leaks in the saline environment. The use of impervious geotextile membranes may therefore be required.</p> <p>12. Certain Water Sensitive Urban Design (WSUD) practices may have adverse impacts on salinity. For example the recharge of surface water to groundwater for storage and reduction in peakflows would significantly increase the risk of salinity. WSUD measures will have to be designed to appropriately manage potential salinity issues.</p> <p>13. Any development should be in accordance with the State Government's Flood Prone Land Policy as outlined in the NSW Government's Floodplain Development Manual (2005). A new Section 117 Direction (4.3 Flood Prone Land) applies to all councils that contain floodplain land within their local government areas. To ensure consistency with Government Policy, the relevant Section 117 Planning Circular and Guideline should also be consulted.</p> <p>14. The current flood assessment for the project area is contained in the "Flood Modelling Summary" report by Bewsher Consulting Pty Ltd (Reference: J150R-3.doc). Generally the approach taken by this investigation to determine design flood levels appears to be consistent with current practice for such studies.</p> <p>15. It is understood the study is being revised to consider the impacts of changed rainfall intensities (and perhaps patterns) due to climate change on flood behaviour through the site.</p> <p>16. In addition to climate change impacts, it is important that any development decisions made by the Department of Planning have regard to the full nature of flooding and the flood hazard in the area. As a result, it may be prudent to also consider not only the extent of flood inundation but also the "provisional flood hazard" profile through the area. Calculation of the provisional flood hazard is based on the flood depth and flow velocity for a range of flood events (including those from more severe than the 1 in 100 year flood event). With such information the potential flood risks can be better defined and more informed decisions can be made on the nature and extent of the development. By doing this, the risks affecting the safety of</p>	<p>7. Noted.</p> <p>8. Noted.</p> <p>9. The site is the subject of a State Significant Site proposal which seeks to retain the existing zoning under SREP 31, consistent with the site's future use as regional parklands.</p> <p>10. The Statement of Commitments obligates Landcom to the preparation of a detailed contamination assessment and environmental management plan to address amongst other matters, salinity.</p> <p>11. Noted. See response to (10) above.</p> <p>12. Noted. This issue was considered in the preparation of the WSUD strategy, and selection of proposed practices. As outlined above, detailed design and further investigations will confirm salinity impacts are appropriately managed.</p> <p>13. Noted.</p> <p>14. Noted.</p> <p>15. The flooding assessment has been revised and is attached as an appendix to the Preferred Project Report. The flood model was revised to account for the proposed re-vegetation of Eastern Creek and Bungarribee Creek. It however, has not been specifically revised in relation to impacts of changed rainfall intensities as consideration of changed rainfall intensities was not a statutory requirement. It is important to note that the revised project's flood modelling has shown that there is no major change in the local area flood regime between the 100 year flood event and the Probable Maximum Flood (PMF) event.</p> <p>Nonetheless, a 10 percent increase in rainfalls (as expected for this location) suggests an increase in 100 year flood levels in the order of 200mm, which would still be under the current freeboard requirement of 500mm. Through detailed design freeboard requirements can be verified to ensure habitable floor levels above the flood levels.</p> <p>16. While provisional flood hazard work has not been undertaken, modelling and mapping of the PMF extent (refer to Figure 2 of the revised flooding report appended to the PPR) indicates a small number of lots will be affected by inundation by the PMF event. The majority of lots closest to the creek will not being inundate. Of those that could be inundated during a PMF event, the properties are large enough to site dwellings outside the PMF event, and evacuation to higher lying land is readily available.</p>

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				people (i.e. providing safe egress to above the probable maximum flood [PMF] level) and property losses (via development controls) are able to be better managed.		