

10279  
17 June 2010

The Director General  
Department of Planning  
GPO Box 39  
Sydney NSW 2000

Attention: Mr Michael File

Dear Michael

**REVISED PART 3A REQUEST FOR MINISTER'S DECLARATION  
EDMONDSON PARK**

We are writing on behalf of Landcom (the proponent) in relation to the proposed redevelopment of the former Ingleburn Army Base and certain adjoining lands within the Edmondson Park Precinct of the South West Growth Centre (referred to herein as 'Edmondson Park'). The site is located partly within the Liverpool LGA and partly within the Campbelltown LGA.

This letter and revised Preliminary Environmental Assessment Report (PEAR) follows the submission made on 26 May 2010. The revised PEAR relates to a modified scope of the project.

As you are aware, it is Landcom's intention to develop the site in stages for a mix of land uses, including approximately 3,300 dwellings, a new town centre incorporating approximately 35,000 – 40,000m<sup>2</sup> retail and employment (business and commercial) floor space, community and education facilities, open space and environmental conservation purposes. The project is intended to be carried out once ownership or control of the former Ingleburn Army Camp land has passed to the State.

The Edmondson Park Precinct, including the site, has been the subject of broad strategic planning investigation and environmental assessment over a number of years by Liverpool and Campbelltown City Councils, the Department of Planning, the Department of Defence (the current landowner of the Ingleburn Army Base) and Landcom (owner of certain lands).

The whole of the Edmondson Park Precinct has been released for urban development by the Minister for Planning. Part of the site; the Ingleburn Army Camp, is currently the subject of a 'delayed' rezoning for urban purposes under Liverpool Local Environmental Plan 2008 and Campbelltown (Urban Area) Local Environmental Plan 2002. Land within the Liverpool LGA is subject to a precinct specific DCP and Section 94 Contributions Plan. Campbelltown Council is in the process of preparing a similar site specific DCP, which may also support a review of local contributions for that part of the site located within its LGA.

It is proposed to prepare a Concept Plan to secure statutory approval for the overall planning framework for the site and to further resolve a number of remaining site-wide infrastructure delivery and land use planning issues. Concurrently with the Concept Plan, Landcom wishes to lodge an application for the detailed design and construction of the initial residential stages of the development (a total of approximately 270 residential lots and 17 rural residential lots) and for the establishment of a new 150 hectare Regional Park.

An amendment to the existing land use zoning provisions is required to facilitate approval of the Concept Plan.

The purpose of this letter is to:

1. Request that consideration be given by the Minister to the inclusion of the site as a State Significant Site (SSS) under Schedule 3 of State Environmental Planning Policy (Major Development) 2005 (the Major Development SEPP); and
2. Seek the Minister's opinion that the development proposal is a development of the kind described in Schedule 1 (Classes of development) of the Major Development SEPP and therefore, is a 'major project' to be determined under Part 3A of the EP&A Act.

Clause 6 of the Major Development SEPP provides that development that in the opinion of the Minister is development of a kind referred to in Schedule 1 (Classes of development) is declared to be a project to which Part 3A of the EP&A Act applies.

Clause 13 in Schedule 1 in the Major Development SEPP, entitled "*Residential, Commercial or Retail Projects*", identifies development for those purposes with a capital investment value of \$100 million. The Edmondson Park project's Capital Investment Value of approximately \$300 million, and proposed range of land uses, clearly satisfy this criteria.

Should the Minister form the opinion that the development is a development of the kind described in Schedule 1 of the Major Development SEPP, we request that:

- a) The Minister authorise Landcom to submit a Concept Plan application for the proposed development;
- b) The Director General issue the requirements for the preparation of a single comprehensive Environmental Assessment to accompany both the site's listing as a SSS under Schedule 3 of the Major Development SEPP and for the preparation of an Environmental Assessment to accompany a Concept Plan application; and
- c) The Director General issue the requirements for the preparation of separate Environmental Assessments to accompany two separate Project Applications, the first relating to the initial residential subdivision stages of the overall development, and the second for the creation of the Regional Park.

To assist in determining the Director General's requirements relating to the preparation of the Environmental Assessments to accompany each application, this letter contains a Preliminary Environmental Assessment setting out the intended scope of the Concept Plan, the detailed Project Applications and the land use zoning amendment.

The Preliminary Environmental Assessment provides detail on the site and identifies the key environmental and planning issues associated with the proposal. It also addresses the Department of Planning's "Guideline for State Significant Sites under the Major Projects SEPP" to support the request to list the site in Schedule 3 of the Major Development SEPP (Section 3).

Within the Part3A approvals process Landcom wishes to continue to build a strong and productive relationship with both Liverpool and Campbelltown City Councils and to ensure that both Councils remain engaged with the delivery of the project over time. Accordingly, Landcom would not object to an arrangement whereby the respective councils were involved in the technical assessment of the detailed Project Applications on behalf of the Minister, if the Director General wished to pursue such an arrangement.

Should you have any queries about this matter, please do not hesitate to contact the undersigned on 9956 6962 or 0413 45 9975.

Yours sincerely,



Lesley Bull  
*Director*

## PRELIMINARY ENVIRONMENTAL ASSESSMENT EDMONDSON PARK

### 1.0 THE SITE AND LOCALITY

#### 1.1 The Site

The subject site comprises an area of approximately 413.3 hectares and forms part of the larger Edmondson Park Precinct within the South West Growth Centre (refer to **Figure 1**).

It is located to the north-west of the M5 Motorway and lies approximately 40 km to the south west of Sydney CBD (refer to **Figure 2**). Approximately 260.4 hectares of the site is located within the Liverpool LGA and approximately 152.9 hectares is located within the Campbelltown LGA.

The majority of the site is currently owned by the Commonwealth (Department of Defence) and was formerly used as an army camp (the Ingleburn Army Camp) up until the 1990s when it was identified as surplus to Defence requirements. Since this time it has been progressively vacated. The project is intended to be carried out once ownership or control of the former Ingleburn Army Camp land has passed to the State.

Other land within the site is owned by Landcom, the Minister Administering the EP&A Act, the Minister for Education, Training and Youth Affairs, the RTA, along with several roads owned by Liverpool City Council and Campbelltown City Council.

The site's legal description, area and current ownership is detailed in **Table 1** below. An aerial photograph showing existing lot boundaries is included at **Attachment A**.

Property description	Area (ha)	Ownership
Lot A DP 188121	48.25	The Commonwealth of Australia
Pt Lot 8 DP 1127652	23.19	Landcom
Pt Lot 8 DP 1127652	27.99	Landcom
Lot 1 DP 1127652	3.49	Minister Administering the EP&A Act
Part Lot 7 DP 1127652	21.84	Landcom
Part Lot 7 DP 1127652	13.58	Landcom
Lot 2 DP 1127652	2.721	Minister Administering the EP&A Act
Lot 3 DP 1127652	0.4554	Minister Administering the EP&A Act
Lot 4 DP 1127652	0.3068	Minister Administering the EP&A Act
Lot 5 DP 1127652	2.853	Landcom
Lot 2 DP831152	50.5	The Commonwealth of Australia
Lot 1 DP831152	16.32	The Commonwealth of Australia
Lot 3 DP831152	37.88	The Commonwealth of Australia
Lot 1 DP801456	5.585	The Commonwealth of Australia
Lot 65 DP654507	5.93	The Commissioner for Main Roads
Lot 2 DP1144667	43.365	The Commonwealth of Australia
Lot 1 DP831150	1.835	Minister for Education, Training & Youth Affairs
Lot 1 DP831149	5.28	The Commonwealth of Australia
Lot 1 DP831148	20.43	The Commonwealth of Australia
Lot 3 DP 246213	81.99	The Commonwealth of Australia
Roads (various)		RTA, Campbelltown City Council, Liverpool City Council

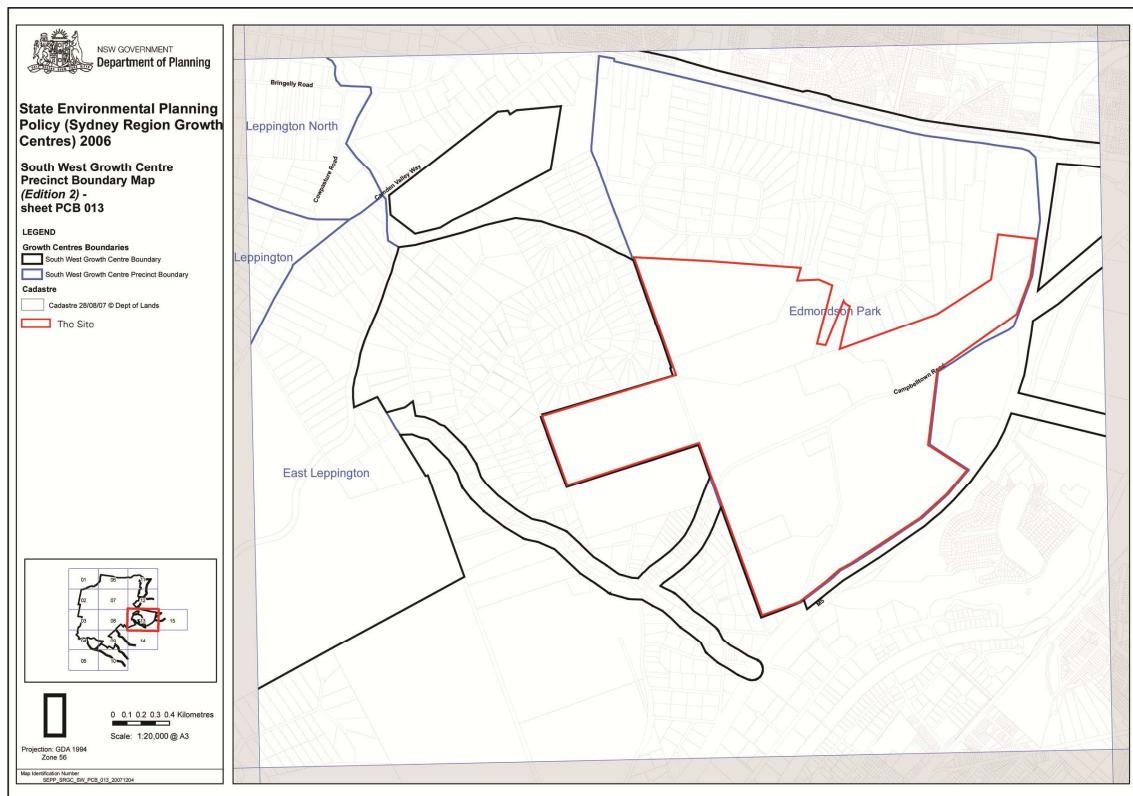
**Table 1 – Legal description, site area and land ownership**

The site is largely vacant. Remnants of military facilities (i.e. cottages, former building slabs, internal roads, training facilities etc) associated with the site’s former Defence use are scattered through-out the site. There are a number of vacant cottages / houses previously used by Defence personnel in an area of the site generally referred to as the “Ingleburn Village”. The Ingleburn North Public School (1.835 hectares) is located on the southern side of Campbelltown Road.

The site is undulating to steep. It slopes from its highest point (80 m AHD) at the intersection of Zouch and Campbelltown Roads to its lowest point (40 m AHD) at its eastern corner and to a similar elevation adjacent to the M5 Motorway in the south-west corner. The central portion of the site along Campbelltown Road forms a ridge with gentle falls to the north and south.

The condition of vegetation on the subject site varies from exotic pasture with negligible ecological value to areas to areas of good condition vegetation with high recovery potential. The cleared portions of the site generally contain non native species.

The site is at the top of three catchments. Maxwell Creek, Bunbury Curran Creek and Cabramatta Creek pass through the site, with associated riparian zones and some woodland habitat (notably Cumberland Plain).



**Figure 1 – Site context plan**

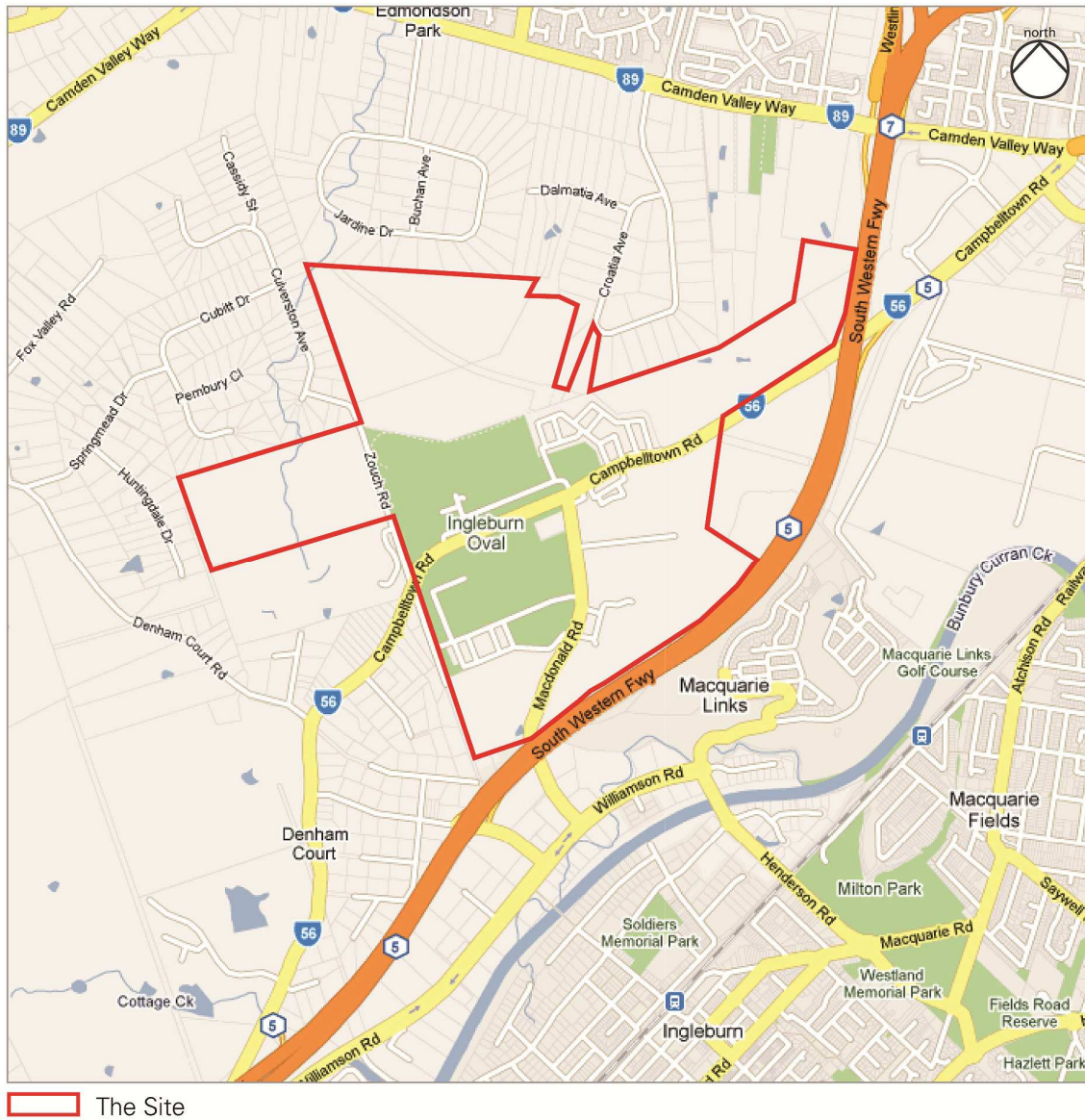


Figure 2 – Site location plan

## 2.0 STATUTORY AND STRATEGIC PLANNING CONTEXT

The following key strategic plans, state and local planning instruments, development control plans and contributions plans currently apply to the site:

- NSW State Plan;
- South West Sub-Regional Strategy;
- State Environmental Planning Policy (Major Development) 2005;
- State Environmental Planning Policy (Sydney Region Growth Centres) 2006;
- State Environmental Planning Policy (Infrastructure) 2007;
- Liverpool Local Environmental Plan 2008;
- Campbelltown Local Environmental Plan 2002;
- Liverpool Development Control Plan 2008;
- Liverpool Contributions Plan 2008 Edmondson Park; and
- Campbelltown Section 94A Development Contributions Plan.

In addition, a number of existing buildings / structures on the site are identified as being of heritage value under the Environment Protection & Biodiversity Conservation Act (EPBC Act) and/or Register of the National Estate.

### 2.1 NSW State Plan & South West Sub-Regional Strategy

The NSW State Plan (Priority Item E6) articulates the State's response to Housing Affordability. It acknowledges the impact of housing supply on affordability and recognises that there is a need to ensure competitive tension in the supply of land so there is a continuing flow of new properties to the market.

The State Plan does not include specific goals for housing and land supply but refers to the goals set in the Metropolitan and Regional Strategies.

The South West Sub-Regional Strategy aims to ensure that adequate land is available and appropriately located to sustainably accommodate the projected housing and employment needs of the region's population over the next 25 years.

Edmondson Park was the first precinct released in the South West Growth Centre. The commencement of this project will provide a catalyst for development within the wider release area, which is currently unable to proceed pending the delivery of significant new lead in services infrastructure. The project will deliver a significant component of the lead in infrastructure required to allow development to proceed including, particularly, connection to the Sydney Water sewer carrier main at Ash Road.

The project will also support and promote transit oriented development in proximity to the new South West rail line, and establish the new 150 hectare Regional Park securing long term agreed conservation outcomes within the South West Growth Centre.

### 2.2 Existing Zoning

The site forms part of the Edmondson Park Precinct within the South West Growth Centre under State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (Growth Centres SEPP). The boundaries of the Edmondson Park Precinct, and the relative boundaries of the subject site are shown on **Figure 1**.

The Edmondson Park Precinct has been released for urban development. The Growth Centres SEPP establishes Liverpool Local Environmental Plan 2008 (LLEP 2008) and Campbelltown (Urban Area) Local Environmental Plan 2002 (CLEP 2002) as the relevant local environmental planning instruments for the land.

Under LLEP 2008 and CLEP 2002, the site has been rezoned for a combination of urban and environmental purposes including the creation of a new 150 hectare regional park to be retained in State government ownership.

For that part of the land that is currently owned by the Commonwealth, the land use zoning provisions that allow for future urban development under LLEP 2008 and CLEP 2002 have been 'delayed' and will only come into effect once:

- Land currently owned by the Department of Defence is vested in the State of NSW; and
- Land that has been identified for the creation of the future regional park has been reserved under the National Parks and Wildlife Act 1974, or is held for the purpose of being so reserved.

Until such time as the 'delayed' rezoning provisions come into effect, the Defence land is zoned for Defence purposes.

A copy of the current land use zoning maps that are in effect and the relevant 'delayed' land use zoning maps under LLEP 2008 and CLEP 2002 are included at **Attachment B**.

**Table 2** provides a summary of the relevant 'delayed' land use zones. There are a range of existing development standards that apply to the land under the existing LEPs, including provisions relating to minimum subdivision lot sizes, maximum FSR, building height and dwelling density.

Liverpool LEP 2008	Campbelltown LEP 2002
<ul style="list-style-type: none"> <li>▪ E1 National Park and Nature Reserves;</li> <li>▪ RE1 Public Recreation;</li> <li>▪ R1 General Residential;</li> <li>▪ R3 High Density Residential;</li> <li>▪ R5 Rural Residential</li> <li>▪ B2 Local Centre; and</li> <li>▪ SP2 Infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 2(c) Higher Density Residential;</li> <li>▪ 3(a) General Business;</li> <li>▪ 6(a) Local Open Space,</li> <li>▪ 3(c) Neighbourhood Business;</li> <li>▪ 5 Special Uses;</li> <li>▪ 6(c) Private Open Space;</li> <li>▪ 7(d5) Environmental Protection 1 ha minimum; and</li> <li>▪ 8(b) National Parks and Nature Reserves.</li> </ul>

**Table 2 – Summary of existing land use zoning (delayed)**

### 2.3 Biodiversity Certification and Conservation Agreement

The Growth Centres SEPP is subject to a Biodiversity Certification Order under the Threatened Species Conservation Act 1995.

The Edmondson Park Precinct and the subject site contains both certified and non-certified lands under the Biodiversity Certification Order. Land that is non-certified comprises the land zoned E1 National Park & Nature Reserves (part of which is also subject to 'delayed' zoning) and part of the land zoned R5 Large Lot Residential under Liverpool LEP 2008, and the land subject to the 'delayed' 8(b) National Parks & Nature Reserves zone under Campbelltown LEP 2002. The remainder of the land is certified under the Order.

A copy of the Biodiversity Certification Order and relevant accompanying maps illustrating the extent of certified and non-certified lands is included at **Attachment C**.

Condition 12 of the Biodiversity Certification Order prevents clearing of native vegetation on non certified lands unless it is in accordance with a plan of management, or agreed to by DECCW. The Edmondson Park Precinct is also subject to a s.305 Conservation Agreement under the Environment Protection & Biodiversity Conservation Act 1999 between the Minister for the Environment, Heritage and the Arts, NSW Minister for Climate Change and the Environment and NSW Minister for Planning.

The Conservation Agreement relates to a Biodiversity Conservation Plan and includes the establishment of the Regional Park (150 hectares), sympathetic management of open space containing Cumberland Plain Woodland, and an offset package that results in an agreed net benefit to the conservation of biodiversity.

A copy of the Conservation Agreement including accompanying maps is included at **Attachment D**.

## 2.4 Heritage

Identified heritage items on the site and their relevant statutory listing are summarised below in **Table 3**:

Item	Description	Relevant Heritage Listing
Ingleburn Army Camp, Campbelltown Road, Ingleburn Village	One of the Australia's major army camps from 1939 to 1970s, first purpose-built infantry training camp for World War II (WW II), also significant for role in training of personnel for Korean and Vietnam Wars, social significance as a symbol of service.	<ul style="list-style-type: none"> <li>▪ Commonwealth Heritage List</li> <li>▪ Register of the National Estate</li> </ul>
Prefabricated Cottages, Ingleburn Village, Bass Road, Ingleburn Village	Prefabricated cottages are adjacent to and formed part of the post war development of the Army Camp, providing a range of accommodation types, including married quarters. Cottages illustrate the use of standardised designs and prefabrication. Cottages set out in a street layout that was reflective of suburban subdivisions and that created a normal community and suburban environment for families.	<ul style="list-style-type: none"> <li>▪ Commonwealth Heritage List</li> <li>▪ Register of the National Estate</li> </ul>
Ingleburn Military Heritage Precinct, Campbelltown Road, Campbelltown	Precinct contains the State's first training camp for battalions serving in WW II, contains representative examples of military architectural styles and indicates a level of technical achievement in their design, construction and layout and also includes a number of memorials.	<ul style="list-style-type: none"> <li>▪ Liverpool Local Environmental Plan 2008</li> </ul>
Ingleburn Village site and Lecture Hall Building (Nissen hut) (Part Lots 1 and 2 DP 831152)	The Ingleburn Village is located directly north-east of the Ingleburn Military Heritage Precinct and consists of a group of free standing houses of two main architectural designs, significance includes landscaping and setting of the cottages as well as the economic use of materials post WW II. It provided post war accommodation. The lecture hall building is located to the west of the village site and housed lecture theatres, cinema, supply store	<ul style="list-style-type: none"> <li>▪ Liverpool Local Environmental Plan 2008</li> </ul>
Mess Hall, Ingleburn Army Camp (Part of Lot 2 DP 831150), Edmondson Park		<ul style="list-style-type: none"> <li>▪ Campbelltown Local Environmental Plan 2002</li> </ul>
Mont St Quentin Oval, including entry gates (Part of Lot 2 DP 831150, Edmondson Park)	The Mont St Quentin Oval, entry gates and flag pole are of historical significance. The oval served as the original parade ground for WW2 troops.	<ul style="list-style-type: none"> <li>▪ Campbelltown Local Environmental Plan 2002</li> </ul>

**Table 3 – Existing heritage listings**

### 3.0 THE PROJECT

Landcom is proposing to deliver a mixed use development on the Edmondson Park site that meet's the State Government's objectives to increase housing supply, provide community benefits and create jobs.

The project is intended to be carried out once ownership or control of the former Ingleburn Army Camp land has passed to the State.

#### 3.1 Concept Plan

The Concept Plan will establish the overall planning framework for the site, including:

- land use type and distribution;
- dwelling yield / density (approximately 3,300 dwellings);
- concept location of and approximately 35,000 – 45,000 m<sup>2</sup> of retail / commercial floor space within the new Edmondson Park Town Centre;
- identification and location of open space and drainage, environmental conservation lands (to form the new Regional Park), and local active and passive recreation facilities;
- road network layout;
- utilities (including power, telecommunications and gas), infrastructure strategy, potable water strategy, sewer concept plan and water cycle management plan;
- location and dimensions of Bushfire Asset Protection Zones; and
- appropriate conservation of European and Aboriginal heritage located on the site.

It is proposed to seek approval as part of the Concept Plan to enable the carrying out of the works necessary to remediate the land in accordance with a Remedial Action Plan without the need for undertaking further environmental assessment.

A variety of housing types is proposed to be delivered. The range of densities will enable a range of dwelling types, allow for social / demographic diversity and provide a proportion of dwellings at affordable price points. The project will include a specific component of moderate income housing and seniors living, which will be detailed in the Environmental Assessment.

It is proposed to develop the Edmondson Park site progressively in stages over a 15-20 year period. The Concept Plan will address the staging and delivery of the overall development having regard to the progressive delivery of necessary infrastructure, services and facilities; and market demand.

The Concept Plan will be accompanied by a proposal with respect to the future developer contributions framework for the provision of local facilities and services within both the Liverpool and Campbelltown LGAs. Contributions towards State infrastructure will generally be in accordance with the Special Infrastructure Contribution applying to the South West Growth Centre. An amendment to the SIC is proposed to be sought in relation to the rate applicable to rural residential development.

A preliminary draft Concept Plan is included at **Attachment E**.

#### 3.2 Project Applications

For staging purposes and to enable site works to begin at the earliest opportunity concurrently with the Concept Plan it is intended to lodge a residential Project Application for early works, infrastructure and subdivision relating to the initial phases of the development. The residential subdivision Project Application comprises:

- A total of approximately 270 residential lots and 17 rural residential lots, with a building and possible temporary use as a sales and information centre;

- Construction of the sewer lead in from the Sydney Water carrier main at Ash Road;
- demolition of structures;
- tree removal;
- earthworks;
- design and construction of physical infrastructure services/utilities, including roads, traffic management works, stormwater and drainage, establishment of open space areas; and
- subdivision for future residential lots, superlots, land for dedication etc.

It is intended to seek staged Construction Certificates as necessary to facilitate the efficient delivery of each phase of the development works.

A separate Project Application is proposed for the detailed landscape design and construction of the new 150 hectare Regional Park.

It is noted that Defence intends to create a title for transfer to the NSW State Government for that part of its lands that will comprise the future Regional Park, and also to create the easement for the proposed sewer that will transverse the site via a separate process.

It is further noted that under *State Environmental Planning Policy (Infrastructure) 2007* once the land has been reserved under the *National Parks and Wildlife Act 1974*, certain development in relation to the establishment of the future Regional Park would be able to be carried out without consent, or would be exempt development. Specifically, consent would not be required for development relating to the exercise of a function under the *National Parks and Wildlife Act, 1974*, and certain works relating to the construction, maintenance and repair of facilities and amenities within the future Regional Park would be exempt development. Under the 'delayed' rezoning provisions of LLEP 2008 and CLEP 2002 a similar scope of development will also become permissible without consent once the National Parks and Nature Reserves land use zoning provisions come into effect.

At this stage however, the works relating to the establishment of the future Regional Park may be required to be carried out before the land is formally reserved under the *National Parks and Wildlife Act*. Accordingly, consent will be required for the works. Furthermore, the scope of final works required for establishment of the Regional Park may not be fully covered by the exemptions under the 'delayed' rezoning provisions and/or the SEPP (Infrastructure) 2007. It is therefore requested that the Director General proceed to issue DGRs to facilitate the lodgement of a Project Application for the carrying out of works relating to the Regional Park.

Landcom will notify the Department if there is no longer a need to lodge a Project Application for the establishment of the Regional Park due either to the timing of the proposed carrying out of the works, or to a change in their scope.

As identified above, the first stage residential Project Application will include the proposed construction of the sewer across the future Regional Park within an easement that is to be created by Defence. Prior to reservation of the land under the National Parks and Wildlife Act 1974, sewerage reticulation systems may be constructed without consent under SEPP (Infrastructure) 2007. However, it is proposed to incorporate the sewer into the Part 3A project application to facilitate a coordinated environmental approval with the approval of the first stage of residential development for which it is required.

The general location and extent of the proposed Project Applications within the overall Concept Plan site boundary is shown on the preliminary draft Concept Plan included at **Attachment E**.

### 3.3 Zoning Amendment

An amendment to both the current and the 'delayed' rezoning provisions under Liverpool LEP 2008 and Campbelltown LEP 2002 is required to facilitate approval of the Concept Plan (and Project Applications) for the project.

At this stage the scope of the amendment required has been identified to include:

- Open space and drainage corridor widths generally / deletion of a section of drainage corridor zoned 6(a) Local Open Space under Campbelltown LEP 2002;
- Potential re-alignment of the E1 National Parks and Nature Reserves zone boundary in the vicinity of the Town Centre to accommodate a perimeter access road;
- Re-location / re-alignment of several future road corridors zoned SP2 Infrastructure (Local Roads) under Liverpool LEP 2008 and 5(d) Special Uses Local Roads under Campbelltown LEP 2002;
- Relocation of the SP2 Infrastructure (Educational Establishment) zone under Liverpool LEP 2008 and 5(a) Special Uses School under Campbelltown LEP 2002; and
- Rezoning of land shown under the 'delayed' rezoning provisions of LEP 2008 and LEP 2002 as 'R5 Large Lot Residential' and 7d(5) Environmental Protection 1 ha minimum to E4 Environmental Living in accordance with the Standard LEP Template.

Furthermore, if a SSS listing is pursued, translation of the land use zoning provisions under Campbelltown LEP 2002 into the Standard LEP Template provisions would be sought for the purposes of consistency across the local government boundary. Currently, the delayed rezoning provisions under Liverpool LEP 2008 are in accordance with the Standard LEP whilst the delayed rezoning under the Campbelltown LEP 2002 is in a form pre-dating the template provisions.

As identified above, the land is currently subject to the Biodiversity Conservation Order that applies to the Growth Centres SEPP. It is a key outcome of this project that the benefits of the Biodiversity Certification continue in relation to the land. Therefore, it is intended that the manner in which the SSS listing is made will establish the appropriate statutory relationship to between SEPP Major Development and the Growth Centres SEPP to maintain the status quo with respect to the Biodiversity Certification Order.

#### 4.0 PROPOSED STATE SIGNIFICANT SITE LISTING

The Department of Planning's "*Guideline for State Significant Sites under the Major Projects SEPP*" requires consideration of specific criteria when making an application to the Minister to nominate a site as State significant.

The Edmondson Park site directly meets the following criteria:

Criteria No.1:

*.....of regional or state importance because it is in an identified strategic location (in a State or regional strategy), its importance to a particular industry sector, or its employment infrastructure, service delivery or redevelopment significance in achieving government policy objectives*

The Edmondson Park Precinct forms part of the South West Growth Centre and its development in the manner proposed will assist in meeting State government policy to release as much land to the market as quickly as possible. The commencement of this project will provide a catalyst for development within the wider Edmondson Park release area, which is currently unable to proceed pending the delivery of significant new infrastructure including connection to the Sydney Water sewer carrier main at Ash Road.

The project will also support and promote transit oriented development in proximity to the new South West rail line, and establish and embellish the new Regional Park securing long term agreed conservation outcomes within the South West Growth Centre.

The project is consistent with and will assist in the delivery of key outcomes of the NSW State Plan and the South West Sub-Regional Strategy by contributing to the supply to market of appropriately located land to sustainably accommodate the projected housing and employment needs of the region's population over the next 25 years.

The Edmondson Park proposal will be able to accommodate around 3,300 residential dwellings. This represents a significant component of the new dwelling requirements for Liverpool and Campbelltown LGAs proposed in the strategy.

Criteria No.2:

*....need alternative planning or consent arrangements*

The site straddles two local government areas and will require the design and delivery of cross boundary works.

There are two separate land use zoning regimes applying to the land - Liverpool LEP 2008 and Campbelltown LEP 2002. Amendment to the existing land use zoning provisions applying to the site under both instruments is required to facilitate approval of the project.

The assessment of the Concept Plan and consideration of the proposed consequential amendments to the underlying land use zoning should be coordinated by a single approval agency to ensure that the strategic planning and development consent outcomes are integrated and determined in an holistic manner.

There are a number of key government agency stakeholders involved in the delivery of the project: Department of Planning, Liverpool Council, Campbelltown Council, RTA, DECCW, Department of Transport, Department of Education and Transport Infrastructure Development Corporation (TIDC). Coordinated outcomes between State government agencies is required, particularly with respect to transport and physical services infrastructure.

On the basis of the above, there is justification for the Edmondson Park development to be planned, assessed and delivered by the listing of the site as a State Significant Site under Schedule 3 of the Major Development SEPP and the declaration of the proposal as a Major Project under clause 6 and Group 13 of Schedule 1 of the SEPP.

## 5.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

The key environmental and land use planning issues that have been identified as needing to be addressed in the environmental assessment(s) are:

- Biodiversity and Conservation;
- Heritage;
- Site Suitability, Urban Design and Structure;
- Transport and Access;
- Infrastructure (Physical and Social) Provision Staging and Funding;
- Contaminated Land and Geotechnical Stability;
- Noise;
- Water Management and Flooding;
- Bushfire.

### 5.1 Biodiversity and Conservation

Substantial areas of the site have been set aside for conservation and environmental management. These areas are currently zoned for conservation purposes under Liverpool LEP 2008 and Campbelltown LEP 2002 (refer to **Attachment B**) and are identified in both the Biodiversity Certification Order and the Conservation Agreement applying to the land (refer to **Attachments C and D**).

Under the Biodiversity Certification Order the majority of the site comprises 'certified land' with the non-certified land comprising the future Regional Park (ie the E1 National Parks and Nature Reserves land and a small area of R5 Large Lot Residential land under Liverpool LEP 2008, and the 8(b) National Parks and Nature Reserves land under Campbelltown LEP 2002) (refer to **Attachment C**).

A fundamental objective of the project will be to maintain the Biodiversity Certification Order and the existing Conservation Agreement which provide the long term conservation outcomes for biodiversity, and particularly for Cumberland Plain Woodland.

Within the framework of the established conservation outcomes, the proposed development will seek consent for:

- Boundary adjustments to certain open space and drainage corridors and conservation lands;
- Detailed landscape design and construction of the Regional Park in accordance with the Interim Statement of Management Intent;
- Connection to the Sydney Water (Ash Road) sewer carrier main across the Regional Park;
- Provision of new road infrastructure to service the future residential and town centre development.

A Statement of Interim Management Intent has been prepared which guides the long term management of the Regional Park. It effectively manages the space and its connection with the surrounding urban area and the Project Application for the Regional Park will be developed in accordance with it.

The Environmental Assessment(s) will include an assessment of impact of the proposed development within the framework of the Biodiversity Certification Order and Conservation Agreement.

The development proposed by the Concept Plan and the detailed Project Applications and any land use zoning amendment will not require amendment to or modification of either the Biodiversity Certification Order or the Conservation Agreement.

Under the Biodiversity Certification Order a separate assessment under the Threatened Species Conservation Act is not required for certified lands. Assessment with respect to the non-certified lands will be undertaken as required. It is intended that the statutory mechanism that effects the proposed zoning changes achieve an appropriate relationship to the Growth Centres SEPP with respect to the continued operation of the Biodiversity Certification Order.

The Conservation Agreement sets out provisions relating to the granting of approvals by the Commonwealth Minister for actions that require the Minister's approval under the EPBC Act. It contains a declaration that certain actions specified under the Agreement do not require approval under the EPBC Act.

The Conservation Agreement includes a Biodiversity Conservation Plan relating to conservation actions involving the establishment and management of the Regional Park and open space areas on the site. The Biodiversity Conservation Plan identifies the listed threatened species and communities and listed migratory species present on the site, including Cumberland Plain Woodland which is a listed endangered ecological community and which provides potential habitat for one vulnerable species and one endangered species.

There are a series of Biodiversity Management Actions established under the Biodiversity Conservation Plan that require the State of NSW to establish and manage the Regional Park and to sympathetically manage public open space that contains Cumberland Plain Woodland in order to provide for positive long term conservation outcomes for biodiversity, and particularly for Cumberland Plain Woodland.

Development in accordance with the Conservation Agreement has been determined not to be a 'controlled action' under the EPBC Act and therefore no separate referral to the Commonwealth will be required.

The proposed project includes some changes to the land identified for open space purposes under the Conservation Agreement. It is considered that these changes do not materially affect the Biodiversity Conservation Plan or the Biodiversity Management Actions under the Conservation Agreement as the land in question does not contain Cumberland Plain Woodland. Accordingly, it is considered that any rezoning or approval in relation to the proposed project accords with the Conservation Agreement.

It is proposed to refer the project to the Commonwealth under the EPBC Act to confirm that the proposal does not materially affect the provisions of the Conservation Agreement and is not therefore a "controlled action".

## 5.2 Heritage

### Aboriginal Archaeology

An Aboriginal Heritage Management Plan for the whole of the Edmondson Park Precinct was prepared by Australian Museum Business Services on behalf of Liverpool and Campbelltown Councils in October 2003. The Heritage Management Plan describes the processes and management outcomes of a Phase One Aboriginal Heritage Assessment to guide future planning policies for the land.

The 2003 Management Plan takes a strategic approach to the management of Aboriginal archaeology across the wider release area including the identification of areas of archaeological significance and cultural sensitivity within Phase One, and the formulation of conservation management guidelines to address these sites and landscape (Phase Two). The strategies contained within the 2002 Management Plan and adopted by Liverpool and Campbelltown City Councils will ensure that appropriate measures are in place to guide future development.

The Concept Plan and the detailed design of the initial subdivision stages will address the appropriate retention and management of indigenous heritage and the likely impacts of the proposal on any known and potential relics and artefacts.

### European Heritage

The site contains a number of Local and Commonwealth listed heritage items as identified at Table 2:

- Ingleburn Army Camp, Campbelltown Road, Ingleburn Village;
- Prefabricated Cottages, Ingleburn Village, Bass Road, Ingleburn Village;
- Ingleburn Military Heritage Precinct, Campbelltown Road, Campbelltown;
- Ingleburn Village site and Lecture Hall Building (Nissen Hut);
- Mess Hall, Ingleburn Army Camp, Edmondson Park; and
- Mont St Quentin Oval, including entry gates, Edmondson Park.

Previous studies assessing the European heritage values of the site have been conducted and will be reviewed and updated. Where appropriate, the Concept Plan proposal will retain and protect identified heritage items.

There are no items identified on the National Heritage List, which would trigger a referral to the Commonwealth Department of Environment, Water, Heritage and the Arts under the EPBC Act. Those items listed on the Commonwealth Heritage List do not trigger the need for a referral under the EPBC Act.

## 5.3 Site Suitability, Urban Design and Structure

The Concept Plan proposes a range of land uses including:

- residential dwellings of varying product type and densities (approximately 3,300 dwellings in total);
- employment generating uses including a wide range of retail, commercial and business activities;
- community facilities, education facilities and infrastructure; and
- heritage conservation, open space and recreation.

The suitability and capacity of the site for the proposed range and intensity of uses taking into account the site's regional context and environmental, economic and social opportunities and constraints has been addressed at the strategic level through the Growth Centres SEPP and rezoning of the site under LEP 2008 and LEP 2002, and by the preparation and adoption by Liverpool Council of a precinct specific DCP for that part of the Precinct within its LGA. The rezoning of the land was supported by a range of detailed environmental studies and investigations that addressed the urban capability of the land and provided appropriate strategic justification for development of the Precinct.

As part of the preparation and assessment of the Concept Plan, the overall planning framework for the site will be ground truthed by the undertaking of a range of technical assessments.

Liverpool Development Control Plan 2008 Part 2.11 – Land Subdivision and Development in Edmondson Park applies to that part of the site within the Liverpool LGA. It is understood that Campbelltown Council is currently in the process of preparing a DCP for that part of the land within its LGA. It is also understood that the draft DCP is targeted for public exhibition in the middle of 2010.

The Concept Plan will reflect the indicative layout plans established by Liverpool and Campbelltown City Councils having regard to the topography of the site, existing major roads and new desired connections to adjacent development areas. The indicative layout plan has been incorporated into Liverpool DCP – Land Subdivision and Development in Edmondson Park and is expected to be incorporated into Campbelltown's new DCP.

As part of the preparation of the Concept Plan, a review of the existing Liverpool DCP will be undertaken to confirm the suitability of existing development controls to guide the design of subdivision and future built form. Landcom will also liaise closely with Campbelltown Council in the preparation of its draft DCP.

It is anticipated that the future detailed subdivision and built form controls for the site will sit within the relevant Council DCPs. If additional or alternative provisions are required, these will be incorporated into the Concept Plan proposal.

#### **5.4 Transport and Access**

Existing transport facilities in the vicinity of the site are limited.

Delivery of the project will require the establishment of a new road hierarchy and transport network connecting to the regional road network of Campbelltown Road.

Campbelltown Road is an arterial RTA road (currently a 2 lane road) that will require upgrading through the Edmondson Park Precinct to 4 lanes to accommodate the overall development.

The Concept Plan will be accompanied by a transport and access study to assess:

- the local, and where appropriate, the regional traffic implications including traffic capacity at key intersections;
- the site's connectivity with the regional road network;
- public transport connections to the site;
- transport and traffic planning within the site; and
- pedestrian and cycling connections to the local area and key transport nodes (i.e. routes and facilities).

The site contains the route for the South West rail line and the location of the new Edmondson Park railway station. The rail line and station is the subject of a separate Part 3A planning approvals process by TIDC.

The Concept Plan will demonstrate how the new Edmondson Park Town Centre integrates with the proposed railway and station.

### **5.5 Physical and Community Infrastructure Provision**

Whilst the site is currently serviced, existing physical infrastructure is not adequate to service the future development and accordingly augmentation will be required to all key utilities services and provision.

Significant physical infrastructure (in addition to roads) that will need to be delivered as part of the development of the site includes:

- Water infrastructure (potable and recycled);
- Sewer connection to the Ash Road carrier main including construction of a gravity fed trunk sewer carrier with connection through the future Regional Park;
- Upgrades to power supply infrastructure including a new zone substation within the site; and
- Provision of fibre to the premises (FTTP) Communications.

A physical infrastructure servicing strategy will be prepared to accompany the Concept Plan to address the future infrastructure requirements of the development as a whole and the requirements for the design and location of critical infrastructure services on and adjacent to the site.

Details of the servicing requirements for each of the subdivision stages 1 to 3 will be included in the Project Application including any necessary interim servicing requirements.

Particularly it is noted that the connection required to the Sydney Water sewer carrier main located to the north-east of the site is intended to be constructed by Landcom to ensure that sewer is available to service the initial phases of the development (and thus servicing the wider Edmondson Park catchment). The final location of the connection is yet to be determined, however it is likely to be required to cross the proposed Regional Park and will need to be coordinated with the design and use of the future Regional Park (Project Application 2).

There are limited existing social and community facilities in the surrounding area and existing facilities and services will not appropriately cater for the needs of incoming residents and workers.

At the time of rezoning of the site investigations were undertaken to determine the appropriate scope and level of community facilities and services required to accommodate the demand of the incoming population.

The Concept Plan will incorporate planning for identified community facilities and services for the whole of the site using the Liverpool Section 94 Contributions Plan 2008 Edmondson Park as a relevant benchmark. The Concept Plan will demonstrate that adequate provision for community infrastructure, including land in appropriate locations, is planned for in line with development staging.

## 5.6 Contaminated Land and Geotechnical Stability

Historical records and previous environmental assessments undertaken on parts of the site have confirmed that the site contains a number of contaminated areas.

Contaminated areas include around existing building margins and building materials, buried waste, presence of underground storage tanks, unexploded ordnance, use and storage of pesticides and herbicides, transformers and switch gear and ground water / surface contamination.

Remediation of parts of the site including remediation of the grenade and small arms ranges, underground storage tanks and asbestos containing building materials was carried out by the Commonwealth between 1999 and 2004. Other remediation works are currently underway by Defence and it is anticipated that a Site Audit Statement will be provided in the future.

On lands owned by Landcom a Remedial Action Plan (RAP) has been endorsed and is in the process of being amended to allow staged remediation works.

The Concept Plan Environmental Assessment will include the Remedial Action Plan addressing the need for any further surface investigations over the entire site, any further completion of remediation processes to be undertaken prior to urban development occurring, and groundwater investigation. Approval will be sought for the carrying out of all necessary remediation works in accordance with the Remedial Action Plan without the need for further environmental assessment, and it is requested that the DGRs reflect this.

Geotechnical issues on the site were investigated by Geotechnique Pty Ltd in 2003. That report reviewed the geology, soil landscapes and surface and groundwater conditions and included detailed assessments of topography, soils, foundation conditions, slope stability, soil and water salinity, soil erodibility and soil aggressivity. The report concluded that based on observed geotechnical conditions, the site is suitable for residential and other forms of development. Further geotechnical investigations of the site will be undertaken during detailed design.

## 5.7 Noise and Vibration

The site is located within close proximity to a number of noise and vibration sources that will need to be appropriately managed as part of the proposed development.

The main sources of noise and vibration are from the future South –West rail link (connecting Glenfield and Leppington), traffic using the M5 Motorway, and increased traffic along Campbelltown Road and Macdonald Road. It is anticipated that homes adjacent to the rail corridor will require sound attenuation and that built form mitigation treatments for road noise will be required.

The Concept Plan will be accompanied by a noise assessment and the detailed design of the initial subdivision stages undertaken in accordance with any relevant recommendations relating to the impact of rail and traffic noise on future uses.

## 5.8 Water Management and Flooding

The site is at the top of three catchments. Maxwell Creek, the major water course through the site, and Bunburry Curran Creek are not at risk of flood. Cabramatta Creek is subject to flooding to a 1% AER at 63.4 m AHD.

A high salinity hazard exists along each watercourse and careful management is required to ensure that stormwater flows do not erode and expose the underlying soil horizons.

The Concept Plan will include a Water Cycle Management Strategy that addresses the implementation of Water Sensitive Urban Design principles.

The detailed storm water management infrastructure location and designs will be provided as part of the future Project Applications.

### **5.9 Bushfire**

The planning and assessment underpinning the Concept Plan and relevant Project Applications will address bushfire planning principles to minimise the overall risk of bushfire. The location and extent of asset protection zones will be determined as part of the Concept Plan and the Environmental Assessment will demonstrate that the future development of the site is consistent with 'Planning for Bushfire Protection 2006'.

### **5.10 Contributions towards State and local infrastructure**

Liverpool Contributions Plan 2008 Edmondson Park applies to that part of the site located within the Liverpool LGA. That part of the site within the Campbelltown LGA is subject to Campbelltown Section 94A Development Contributions Plan, however this plan does not contemplate future population growth associated with greenfield development of the nature and scale proposed.

Landcom proposes to make contributions in relation to development within the Liverpool LGA in accordance with the existing Liverpool Contributions Plan. It is proposed that the Minister determine payable contributions for the development in the Campbelltown LGA. It is proposed that the contributions payable in relation to development within Campbelltown would be benchmarked to those required under the Liverpool Contributions Plan.

It is also intended that Landcom will undertake all necessary on site works as works in kind in lieu of payment of a monetary contribution. Landcom will present a schedule of works and indicative costings for the whole of the development as part of the Concept Plan and commit to the delivery of these works, and to the dedication of land to the relevant Council as appropriate, as part of the Concept Plan Statement of Commitments.

The Edmondson Park Precinct is subject to the Special Infrastructure Contribution (SIC) that applies to the North West and South West Growth Centres.

Under the SIC a contribution is payable with respect to the land zoned R1 General Residential, R3 High Density Residential and R5 Large Lot Residential under Liverpool LEP 2008 and 2(c) Higher Density Residential and 6(c) Private Open Space under Campbelltown LEP 2002.

Contributions towards State infrastructure are proposed to be generally in accordance with the SIC. It is proposed to rezone existing areas of land that are zoned R5 Large Lot Residential and 75(5) Environmental Protection 1 ha minimum to E4 Environmental Living to facilitate the application of the differential SIC residential rate to large lot residential development within the site.