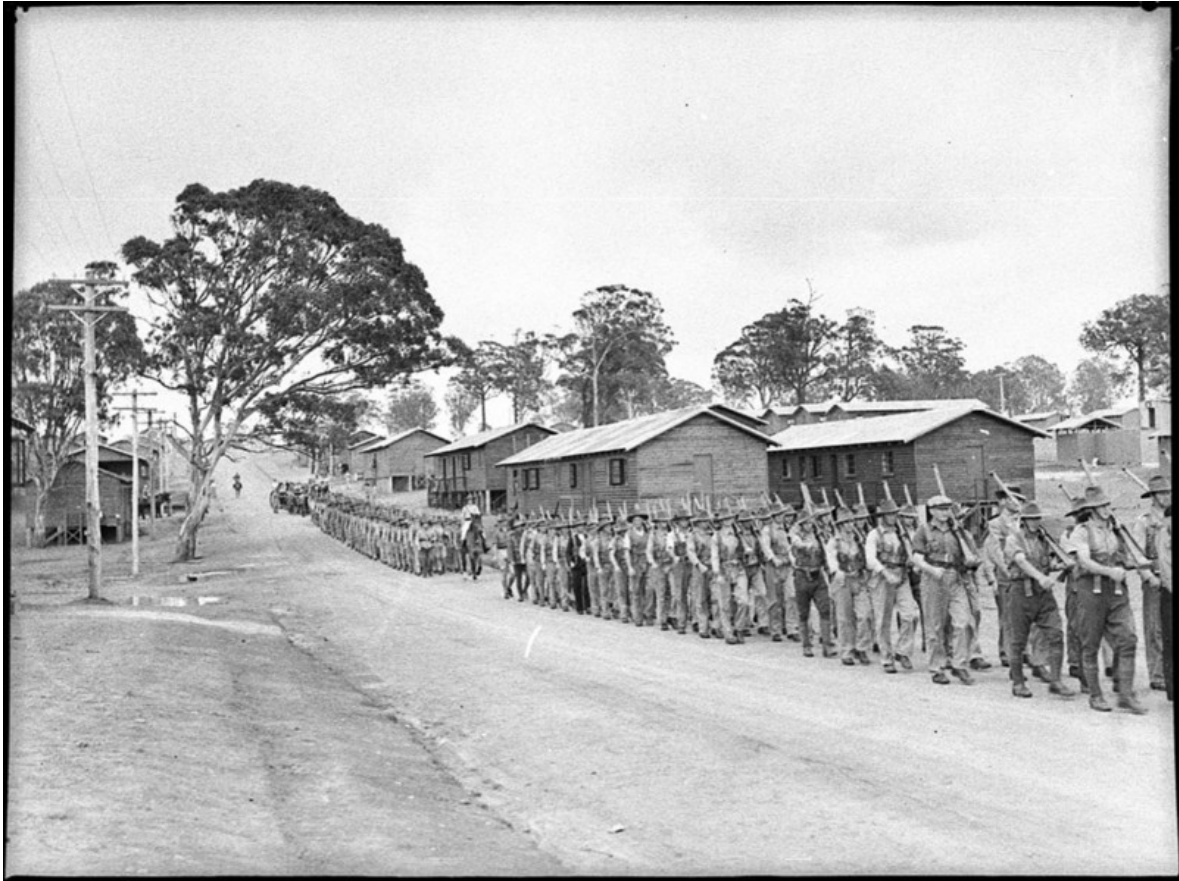


STATEMENT OF HERITAGE IMPACT
EDMONDSON PARK SOUTH PART 3A-CONCEPT PLAN



prepared for

LANDCOM

by

TANNER ARCHITECTS

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STATEMENT OF HERITAGE IMPACT
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EXECUTIVE SUMMARY

The Ingleburn Army Camp was one of Australia's major army camps from 1939-1970s. It has considerable historic significance because it was the first purpose-built infantry training camp for World War II and played a central role in the mobilisation of Australia's citizens and their military training throughout the war. It also played an important role in the training of personnel for the Korean and Vietnam Wars. The Army Camp was a major centre in Australia for training under the National Service Scheme (1951-1972), is also associated with the anti-conscription movement of the late 1960s and early 1970s and played a major role in the training of Army Reserves from 1973 through to the 1990. The Ingleburn Army Camp has social significance because it is a tangible symbol of the service given by generations of soldiers who trained there and as a place where respect for and remembrance of that service became a highly valued tradition. It has value to those who lived, and worked there and has a long association with a State-wide "Army community". It also serves to symbolise the role of the Army within the area to the local community.

The significance of the site and buildings and other features remaining on the Army Camp site, along with its social significance, has been recognised by heritage listings at a Commonwealth level (Register of the National Estate, Commonwealth heritage List) and heritage listings by Liverpool City Council and Campbelltown City Council. Individual listed items include prefabricated cottages in the Ingleburn Village, the Ingleburn Military Heritage Precinct, the former Mess hall and the Mont St Quentin Oval, including entry gates.

This statement of Heritage Impact, prepared by Tanner Architects, responds to the Director General's Requirements for the subject site in accordance with Section 75F of the Environmental Planning and Assessment Act 1979 and in relation to Heritage, as follows: Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with *Assessing Heritage Significance* (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.

The report includes the following components:

- A summary site history;
- Summary of heritage significance of the site and individual built components;
- Statutory considerations;
- Evaluation of the proposed Part 3A Concept Plan for Edmondson Park against Heritage Council guidelines and planning instruments of Liverpool City Council and Campbelltown City Council.
- Evaluation of the proposed Part 3A Concept Plan against the Director General's Requirements and the review of previous reports as required by the NSW Heritage Branch.

The report concludes that the proposed Part 3A Concept Plan for Edmondson Park demonstrates compliance with the Heritage Act 1977, and the Director General's Requirements for the Part 3A application including the heritage impact assessment guidelines published by the NSW Heritage Office and the heritage provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002 and the Liverpool Local Environmental Plan 2008. Implementation of the Concept Plan will result in the retention of heritage items, including the Ingleburn Military Heritage Precinct, the Mont St Quentin Oval and entry gates and three Riley-Newsum prefabricated houses, which are to be relocated. An archival recording will be made of two Amals Sagverks Aktiebolag prefabricated houses prior to demolition. Two heritage items, the Mont St Quentin Mess Hall and the Lecture Hall, are to be demolished by the Department of Defence.

The Part 3A Concept Plan presents building type envelopes, landscaping and site works and promotes views to and from the heritage items that are generally appropriate from a heritage perspective for heritage items that are to be retained.

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1 INTRODUCTION

This report has been prepared by Tanner Architects to accompany a Concept Plan Application under Part 3A of the Environmental Planning & Assessment Act, 1979 (EP&A Act) and a proposal for State Significant Site listing under Schedule 3 of State Environmental Planning Policy Major Development 2005 (SEPP Major Development) in relation to the former Ingleburn Army Base and certain adjoining lands within the Edmondson Park Release Area of the South West Growth Centre (referred to herein as 'Edmondson Park South').

Landcom is proposing to deliver a new diverse and sustainable urban community at Edmondson Park South. Once complete, Edmondson Park South will accommodate a mix of land uses, a diversity of housing (approximately 3,200 dwellings), a new town centre incorporating 35,000 – 45,000m² retail, business and commercial floor space with employment opportunities for 1,000 people, multi-purpose community and education facilities, a new 150 hectare Regional Park, a number of other local parks and environmental conservation areas.

The new urban community at Edmondson Park South will meet's the State Government's objectives to increase housing supply, provide community benefits and create jobs.

The purpose of the Concept Plan is 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. The Project Application (submitted concurrently with the Concept Plan) for early works, infrastructure and subdivision relating to the initial phases of the development will enable site works to begin in 2010.

1.1 THE SITE

The subject site comprises an area of approximately 413.3 hectares and forms part of the larger Edmondson Park Release Area within the South West Growth Centre. It is located to the north-west of the M5 Motorway and lies approximately 40 km to the south west of Sydney CBD. Approximately 260.4 hectares of the site is located within the Liverpool LGA and approximately 152.9 hectares is located within the Campbelltown LGA. Refer to Location Plan at Figure 1.

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 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 cottages / houses previously used by Defence personnel in an area of the site generally referred to as "Ingleburn and Bardia Villages". The Ingleburn North Public School (1.835 hectares) is located on the southern and the Bambi Preschool on the northern side of Campbelltown Road.

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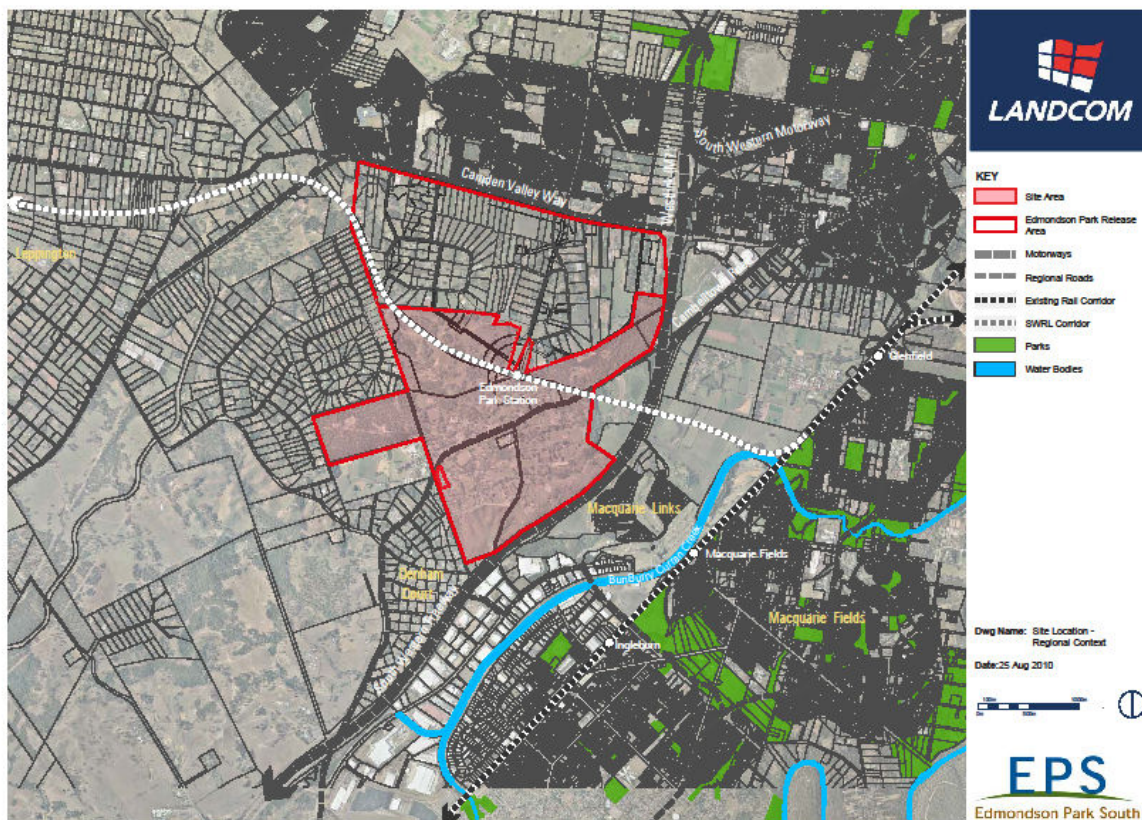


Figure 1: Location Plan

1.2 CONCEPT PLAN

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

- land use type and distribution;
- a mix of housing types and densities (approximately 3,200 dwellings);
- concept location of and approximately 35,000 – 45,000 m² of retail / business / commercial floor space within the new Edmondson Park Town Centre;
- identification and location of open space and drainage corridors, environmental conservation lands (to form the new Regional Park), and local active and passive recreation facilities, including levels of embellishment;
- expanded Ingleburn North Primary School and new combined Primary/High School to the north of the site;
- road network layout;
- pedestrian and cycleway network layout;
- pedestrian bridge over the south western railway;
- Campbelltown Road corridor including the establishment of key intersection locations and configuration;

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- 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;
- appropriate interpretation of European and Aboriginal heritage located on the site;
- erection of signage and billboards;
- remediation works;
- decommissioning of the existing Sewerage Treatment Plant (STP); and
- demolition.

The Concept Plan also sets out an approval framework that will enable the carrying out of the works necessary to remediate the site in accordance with a Remediation Strategy without the need for undertaking further environmental assessment.

A variety of housing types is proposed to be delivered. This will provide for a range of housing price points and will include moderate income housing and housing for seniors.

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 is accompanied by a proposal with respect to the future developer contributions framework for the provision of local facilities and services within the Liverpool and Campbelltown LGAs as well as State Infrastructure.

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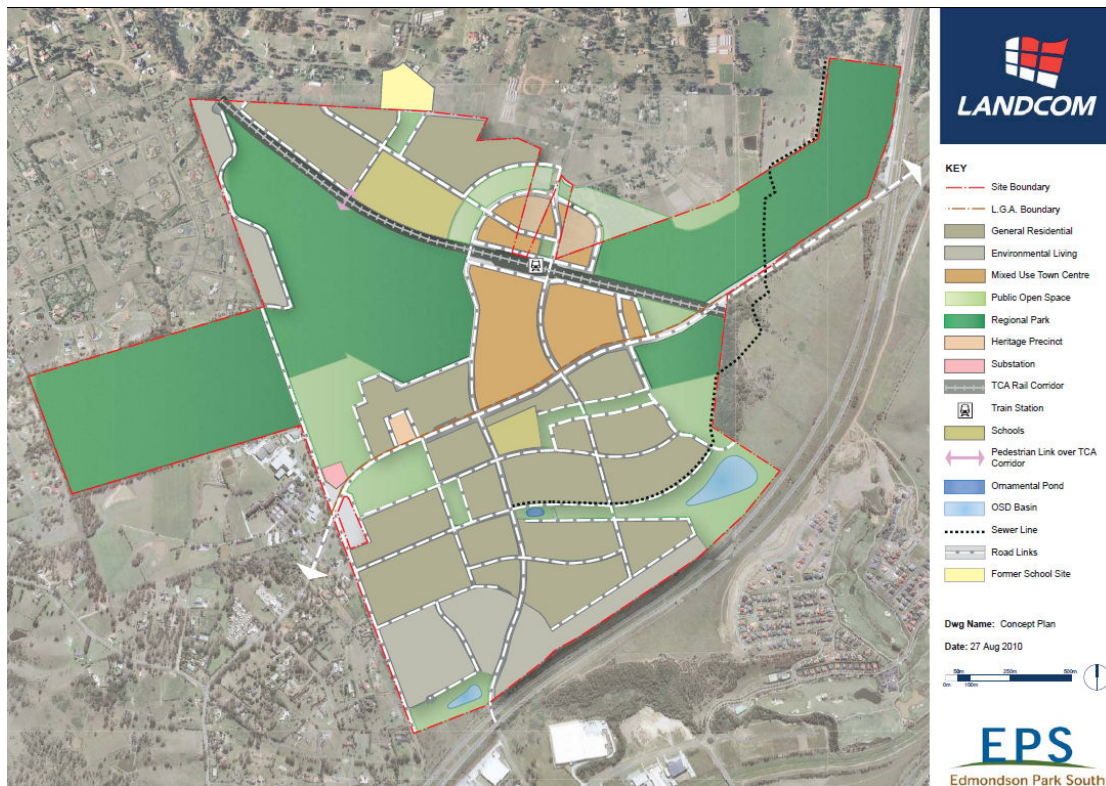


Figure 2: Concept Plan

1.3 PROJECT APPLICATION

The residential subdivision Project Application comprises:

- The creation of 206 residential lots, 8 super lots for future subdivision 15 Environmental Living lots and 3 lots for dedication to Campbelltown City Council as Public Reserve in 5 stages*;
- The dedication of roads to Campbelltown City Council;
- On-site works comprising:
 - tree removal;
 - earthworks including excavation, cut and fill;
 - design and construction of physical infrastructure, including roads, stormwater drainage and utility reticulation, traffic management works, establishment of open space areas;
 - retaining walls as determined during detailed design;
 - design and construction of staged stormwater water quantity and quality infrastructure to achieve objectives required by the Water Cycle Management (WCM) strategy for the greater site;
 - demolition of all existing structures;
 - erosion and sediment control to areas of roadworks and bulk earthworks including provision of temporary sedimentation ponds and diversion drains;
 - design and construction of an ornamental pond;
 - landscaping of road reservations;

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- erection of signage and billboards; and;
- embellishment of open space.
- Off-site works comprising:
 - construction of the sewer lead in from the Sydney Water carrier main at Ash Road;
 - upgrade of overhead mains and construction of electrical lead-in feeders from the existing zone substation at Prestons;
 - connection to utility services, potable and recycled water, electricity, gas and telecommunications in Campbelltown and MacDonald Roads;
 - connection to existing stormwater drainage;
 - tree removal;
 - earthworks including excavation, cut and fill;
 - design and construction of physical infrastructure, including roads, stormwater drainage and utility reticulation, traffic management works, including the connection to the existing MacDonald Road;
 - design and construction of staged stormwater water quantity and quality infrastructure to achieve objectives required by the Water Cycle Management (WCM) strategy for the greater site;
 - erection of an acoustic wall;
 - erection of signage and billboards;
 - extension or relocation of existing services including potable and recycled water, gas, telecommunication, power;
 - demolition of all existing structures; and;
 - proposed new intersection to existing Macdonald Road.

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

The first stage residential Project Application will include the proposed construction of a gravity sewer line through the future Regional Park.

* A number of residue lots will be created in undertaking the Project Application, the number of lots identified in the above description relate to the ultimate number of lots that will be created in the Project Application.

1.4 PLANNING BACKGROUND

The Edmondson Park Release Area, 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 Camp) and Landcom (owner of certain lands).

The whole of the Edmondson Park Release Area 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.

In June 2010 the Minister for Planning considered a Preliminary Assessment Report for the Edmondson Park South Project that provided justification for the planning, assessment and delivery of the project to occur

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under Part 3A of the EP&A Act, having regard to the demonstrated contribution that the project will have to achieving State and regional planning objectives.

Subsequently, on 23 July 2010, pursuant to Clause 6 of SEPP Major Development, the Minister for Planning formed the opinion that the Edmondson Park Project constitutes a Major Project to be assessed and determined under Part 3A of the EP&A Act, and also authorised the submission of a Concept Plan for the site. In doing so, the Minister also formed the opinion that a State Significant Site (SSS) study be undertaken to determine whether to list the site as a State Significant Site in Schedule 3 of SEPP Major Development.

The Part 3A process under the EP&A Act allows for the Edmondson Park South Project to be planned, assessed and delivered in a holistic manner, with a uniform set of planning provisions and determination by a single consent authority. Given the scale of the proposal, the Concept Plan and SSS listing provide the opportunity to identify and resolve key issues such as land use and urban form, development staging, infrastructure delivery and environmental management in an integrated and timely manner.

This report has been prepared to fulfil the Environmental Assessment Requirements issued by the Director General for the inclusion of the Edmondson Park site as a State Significant Site under SEPP Major Development, and for a Concept Plan approval for the development.

Specifically, this report addresses the following requirements:

Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with Assessing Heritage Significance (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.

The NSW Heritage Branch, in a letter dated 20 July 2010, recommended inclusion of several requirements for cultural heritage in response to an invitation to comment on a draft of the Director-General's requirements. The Heritage Branch requirements include assessing the consistency of the proposal with recommendations included in several reports. The reports that consider European heritage are:

- Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001;
- Heritage Concepts Pty Ltd, South West Rail Link Environmental Assessment – Technical Paper 7: Preliminary Assessment of Historical Archaeological and Cultural Heritage Values, 2006;
- HLA Envirosciences, Non-Indigenous Heritage Assessment: Edmonson Park, NSW, 2003;
- AMBS, South West Rail Link – Glenfield to Leppington Rail Line: Historic Heritage Impact Assessment, 2010.

The NSW Heritage Branch has also asked for:

- A detailed heritage Interpretation Strategy and specific site works proposed throughout the precinct to implement interpretation of the Ingleburn Army Camp, to be prepared and submitted for comment by the Heritage branch before commencement of construction;
- An assessment of the suitability of the Ingleburn Army Camp (or part of it) for nomination and listing on the NSW State Heritage register to be provided to the Heritage Branch prior to commencement of construction.

1.5 STRUCTURE OF THE STATEMENT OF HERITAGE IMPACT

The statement follows the general structure set out in the *NSW Heritage Manual*, prepared by the NSW Heritage Office and the Department of Planning.

1.6 DEFINITIONS

The terms and definitions used in this report are as set out in the Australia ICOMOS Burra Charter for the Conservation of Places of Cultural Significance (1999) as follows:

"Place means site, area, land, landscape, building or other work, group of buildings or other works, and may include components, contents, spaces and views.

Cultural significance means aesthetic, historic, scientific or social value for past, present or future generations.

Fabric means all the physical material of the place, including components, fixtures, contents, and objects.

Conservation means all the processes of looking after a place so as to retain its cultural significance.

Maintenance means the continuous protective care of the fabric and setting of a place, and is to be distinguished from repair. Repair involves restoration or reconstruction.

Preservation means maintaining the fabric of a place in its existing state and retarding deterioration.

Restoration means returning the existing fabric of a place to a known earlier state by removing accretions or by reassembling existing components without the introduction of new material.

Reconstruction means returning a place to a known earlier state and is distinguished from restoration by the introduction of materials [new or old] into the fabric.

Adaptation means modifying a place to suit the existing use or a proposed use.

Use means the functions of a place, as well as the activities and practices that may occur at the place.

Compatible use means a use which respects the cultural significance of the place. Such a use involves no, or minimal, impact on cultural significance.

Setting means the area around a place, which may include the visual catchment.

Related place means a place that contributes to the cultural significance of another place.

Related object means an object that contributes to the cultural significance of a place but is not at the place.

Associations mean the special connections that exist between people and a place.

Meanings denote what a place signifies, indicates, evokes or expresses.

Interpretation means all the ways of presenting the cultural significance of a place".

1.7 AUTHOR

This Statement of Heritage Impact has been prepared by Roy Lumby, senior heritage specialist of Tanner Architects and Megan Jones, Director of Tanner Architects.

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1.8 DIRECTOR GENERAL REQUIREMENTS – PART 3A CONCEPT PLAN APPLICATION

In accordance with Section 75F of the Environmental Planning and Assessment Act 1979, the Director General's Requirements for the subject site are outlined for Edmondson Park, in relation to Heritage, as follows:

Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with Assessing Heritage Significance (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.

It should be noted that the document Assessing Heritage Significance (NSW Heritage Office 2001) provides guidelines for the evaluation and assessment of the potential heritage significance of items. In the case of the former Ingleburn Defence Site the heritage significance of the place and individual components within its boundaries have already been assessed. Assessments include the Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001 and the Register of the National Estate and local government listings for the place.

The NSW Heritage Branch has recommended inclusion of several requirements for cultural heritage, which include assessing the consistency of the proposal with recommendations included in several reports. The reports that consider European heritage are:

- Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001;
- Heritage Concepts Pty Ltd, South West Rail Link Environmental Assessment – Technical Paper 7: Preliminary Assessment of Historical Archaeological and Cultural Heritage Values, 2006;
- HLA Envirosiences, Non-Indigenous Heritage Assessment: Edmonson Park, NSW, 2003;
- AMBS, South West Rail Link – Glenfield to Leppington Rail Line: Historic Heritage Impact Assessment, 2010.

The NSW Heritage Branch has also asked for:

- A detailed heritage Interpretation Strategy and specific site works proposed throughout the precinct to implement interpretation of the Ingleburn Army Camp, to be prepared and submitted for comment by the Heritage branch before commencement of construction;
- An assessment of the suitability of the Ingleburn Army Camp (or part of it) for nomination and listing on the NSW State Heritage register to be provided to the Heritage Branch prior to commencement of construction.

1.9 IDENTIFIED HERITAGE ITEMS: TABLE 1

Identified heritage items on the site are identified in the following table, which is based on Commonwealth and local government listings. Numbers refer to Figure 3:

Item	Description	Heritage Status
Ingleburn Army Camp, Campbelltown Road, Ingleburn Village.	One of Australia's major army camps from 1939 until the 1970s. The first purpose-built infantry training camp for World War II soldiers and also played a significant role in the training of personnel for the Korean and Vietnam Wars. It has social significance as a symbol of military service.	Commonwealth Heritage List; Register of the National Estate.

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<p>Prefabricated Cottages, Bass Road, Ingleburn Village. 8 cottages are listed; 3 have been demolished (4 and 5).</p>	<p>The prefabricated cottages were part of the post-World War II development of the Ingleburn Army Camp and provided a variety of accommodation types, including married quarters. The cottages demonstrate the use of standardised and prefabricated designs and were constructed around a street layout that reflected suburban subdivision patterns and created a communal, "suburban" environment for families.</p>	<p>Commonwealth Heritage List; Register of the National Estate.</p>
<p>Ingleburn Military Heritage Precinct, Campbelltown Road, Ingleburn (2).</p>	<p>The precinct contains the Bardia Gates, Guard House, Cell Block, former Post Office and Chaplains Office and three representative Sydney Williams prefabricated buildings to the State's first training camp for battalions serving in World War II, contains representative examples of military architectural styles and indicates a level of technical achievement in their design, construction and layout. The precinct also contains a number of memorials.</p>	<p>Liverpool Local Environmental Plan 2008: State significance.</p>
<p>Ingleburn Village site and Lecture Hall Building (Nissen hut), Campbelltown Road, Ingleburn (3).</p>	<p>The Ingleburn Village is located to the north-east of the Ingleburn Military Heritage Precinct and consists of a group of two types of proprietary prefabricated detached houses. Its significance includes landscaping and the setting of the cottages along with the economic use of building materials after World War II. The Lecture Hall Building is located to the west of the village site and housed lecture halls, cinema and store.</p>	<p>Liverpool Local Environmental Plan 2008: Local significance.</p>
<p>Mess Hall, Ingleburn Army Camp, Campbelltown Road, Edmondson Park (6)</p>		<p>Campbelltown Local Environmental Plan 2002: National significance.</p>
<p>Mont St Quentin Oval, including entry gates, Campbelltown Road, Edmondson Park (1)</p>	<p>The Mont St Quentin Oval, entry gates and flag pole are of historical significance. The oval served as the original parade ground for World War II troops.</p>	<p>Campbelltown Local Environmental Plan 2002: National significance.</p>

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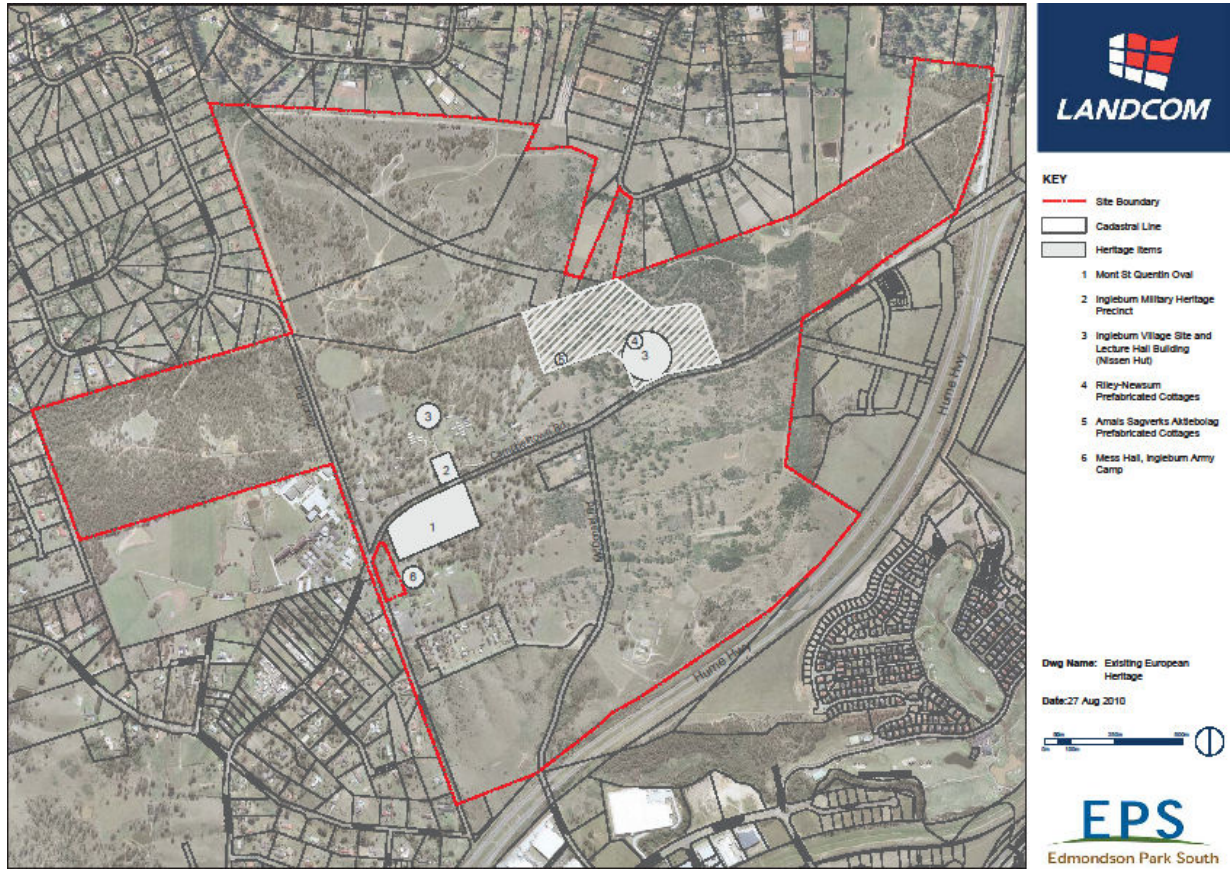


Figure 3: Location of heritage items

2 HISTORICAL OVERVIEW

2.1 INTRODUCTION

This section of the report draws on information contained in previous documents:

- Godden Mackay Logan, Ingleburn Defence Site - Heritage Analysis (June 2001);
- Heritage inventories for identified heritage items.

There were two major phases of construction on the site:

- 1939-1946: provision of training facilities for World War II
- 1951-1959: expansion of facilities for the Korean War and reintroduction of National Service training.

2.2 EARLY EUROPEAN HISTORY

The former Ingleburn Defence site is located in an area that was originally known as Camden. Permanent settlement commenced during the early years of the nineteenth century. Explorer and naturalist George Caley passed through the district during 1807; in 1816 the first of four land grants that are incorporated into the Defence site was made to James Meehan, which was named Macquarie Fields. The other grants were Charles Parker's "Parker's Farm" (1817), Henry Kitchen's "Claremont" (1819) and William Lilly's "Swaffham." At this time transport links to Sydney were being constructed in the district after Governor Macquarie founded Liverpool in 1810 and Campbelltown in 1820.

During the 1880s initial suburban development commenced in the locality around Ingleburn, but by 1906 it remained sparsely settled. During the early twentieth century the district around Campbelltown (which included Ingleburn) the principal industry was dairying, although it seems unlikely that the defence site was used for this purpose.

2.3 THE INGLEBURN DEFENCE SITE

After the declaration of war on 3 September 1939 specifications were prepared for what was termed the "Ingleburn Military Camp", which was to be the first purpose-built army camp for training Australian infantry in World War II. The Army appears to have started occupying the site by October 1939 as its development as an embarkation camp commenced early that month. The Army did not acquire the land, some 277 hectares in extent, until 1940. Two hundred and fifty three buildings were initially erected to accommodate the newly formed 2nd AIF but not long after eighty more were constructed. The basic building unit was a prefabricated structure manufactured by Sydney Williams & Co, which had been manufacturing prefabricated buildings since the 1890s. Although primarily an infantry camp, Ingleburn served other Corps, including engineers, transport, signals, and anti-aircraft units. It was also an assembly point for a number of Army brigades.

From 1945 to 1951, the years spanning the end of World War II and Australian participation in the Korean War, sections of land were leased to farmers. However, the onset of Australian involvement in the Korean War during 1950 caused changes to the use and the size of the camp. Another 46.5 hectares was acquired to the west of Zouch Road in 1951, followed by another 92.7 hectares two years later, which land was subsequently sold. During the Korean War battalions destined for duty were stationed at the camp.

National Service, which had been in operation during World War II, was reintroduced in 1951 and by 1954 Ingleburn had become a major centre for the country's National Service Program. The facilities within the camp had also expanded so that by 1959 a number of playing fields and larger buildings such as mess halls and training complex had been constructed while a large part of the married quarters (Ingleburn Village) had

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been built. The village consisted of imported pre-fabricated dwellings, Riley-Newsum cottages from Britain and Amals Sagverks Aktiebolag cottages from Sweden.

A kindergarten was established by wives of servicemen in 1952. Once again Sidney Williams prefabricated huts featured prominently albeit in a modified and more flexible form.

The main purpose of the Defence site between 1951 and 1972 was the training of national Service Recruits. It became a focus of public attention after compulsory military training was introduced by the Commonwealth in 1964 and conscripts were sent abroad to fight. After the abolition of National Service in 1972 the Defence site became headquarters of the Second Training Group of the Army Reserves.

In 1988 the administration of the Married Quarters, which included Ingleburn Village, was transferred to the defence Housing Authority. Two years later almost 93 hectares to the north of the Bardia Barracks were sold to Landcom NSW. From the middle of the 1990s activity began to wind down and as buildings became vacant they were demolished. Further attrition resulted from vandalism and arson. In 2001 a core set of remaining buildings in the Bardia Barracks and a section of the site identified as Area G were proposed for a permanent memorial. This resulted in the listing of the Ingleburn Military Heritage Precinct by Campbelltown City Council.

Apart from this the Ingleburn Defence site has great social significance. It is a symbol of the service given by the generations of soldiers who trained here and as a place where respect for and remembrance of that service has is maintained. To the local community it is a landmark that symbolizes the important historical and contemporary role played by the Army within the area and as a place where links were forged between civilians and Army.

3 ASSESSMENTS OF SIGNIFICANCE

The various heritage listings relating to the site contain assessments of heritage significance. The site and several components of it are listed as heritage items by the Commonwealth Government, Campbelltown City Council and Liverpool City Council.

3.1 AUSTRALIAN HERITAGE COUNCIL

The Ingleburn Army Camp is listed in the Register of the National Estate, where it is identified as the Ingleburn Army Camp. It was registered on 28 October 2003.

The prefabricated cottages that were erected during the 1950s for married quarters are listed separately. The listing is also dated 28 October 2003.

The Commonwealth Department of the Environment and Heritage Australian Heritage Database:

The Statement of Significance that is part of the inventory sheet in the Department's Australian Heritage Database for the Ingleburn Army Camp includes built items, flora and fauna. The following extract from the entry for the Army Camp is for built items only:

The Ingleburn Army Camp, one of Australia's major army camps from 1939-1970s, is of considerable historic significance as the first purpose-built infantry training camp for World War II. It played a central role in the mobilisation of Australia's citizens and in their military training throughout the war and was the assembly point for the first military contingent assembled for overseas service in the war.

Ingleburn Army Camp is also significant for its role in the training of personnel for the Korean and Vietnam Wars. The Army Camp was a major centre in Australia for training under the National Service Scheme (1951-1972) and it is also associated with the anti-conscription movement. The Army Camp also played a major role in the training of Army Reserves from 1973 through to the 1990s ...

Ingleburn Army Camp is of social significance as a symbol of the service given by generations of soldiers who trained there and as a place where respect for and remembrance of that service has become a continuing and highly valued tradition. It has social value to those who lived, and worked at the army camp. Ingleburn Army Camp has a long association with a State-wide "Army community", and is a place where this sense of community is expressed, celebrated and passed on. It also serves to symbolise to the community the role of the Army within the area ...

The Sydney Williams Type Barracks (1939-1946) have a strong historic association with the war effort mounted by Australia for World War II. The huts are able to demonstrate aspects of military life at the camp. The placement of the huts in rows enhances the visual impact of the group. The barracks form a major part of the memories of the site for those who have been accommodated in them ...

The Kitchen/Dining Hall Complex, c1955, is historically significant for its association with the expansion of the camp as a training school after the Korean War and following the introduction of National Service. It illustrates the scale of the former Training School operations and the dining needs of large numbers of troops at a permanent camp site. It represents the military practice of developing standardised building responses to needs associated with the support of a large number of army personnel. It is visually prominent due to its location, size and clerestory roof line. It contains moveable items such as crockery, furniture and kitchen appliances which illustrate its role.

The Lecture Hall Building (former Recreation Centre), 1953, is of historical significance for its role as a recreation centre erected specifically for National Service trainees of non-commissioned rank and as an

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education facility in its use as part of the Second Training Group Headquarters facility. Its provision reflects the self-containment characteristic of military organisations of the period. It is of social significance to National Servicemen as a former recreation facility and social centre and as a meeting place for army personnel. It is an example of architecture developed for military support structures after World War II. This building uses an unusual combination of arch-frame and standard hut construction techniques and is important for demonstrating efficient structural and acoustic design qualities for multi-purpose use ...

The Bardia Barracks entrance precinct, comprising entrance gates, Guard House and Cell Block, Chaplain's Office and Post Office, is significant as a landmark for the local community symbolising the important role played by the Army in this area. The area symbolises the entry to army life, an event which was formative in the lives of many thousands of people who served at Ingleburn. The entry gates are associated with the establishment of military barracks on the site from 1939 and with Bardia Barracks in particular. The brick sentry boxes are symbolic of the military presence at the site ...

The Guard House and Cell Block are historically significant as part of Bardia Barracks, with the introduction of conscription and in particular, their use during the Vietnam War. It is a representative example of a guard house and cell block. The cells demonstrate aspects of defence force discipline ...

The Mont St Quentin Oval, entry gates and flagpole are of historical significance. The oval served as the original parade ground for WWII troops, and the location from which troops were formally farewelled and welcomed on return from service overseas ...

The Memorials located within the Ingleburn Military Heritage Precinct are historically significant, being associated with former military personnel and the regiments who have occupied the Army Camp. The memorials commissioned by particular regiments or organisations celebrate or commemorate the contribution made by a particular regiment or the military collectively to the war effort. The memorials have become the focus of commemoration and gatherings ...

It should also be noted that the Kitchen/Dining Hall Complex and the Lecture Hall Building are to be demolished by the Department of Defence in accordance with Commonwealth processes.

The Australian Heritage Database inventory listing for the Prefabricated Cottages of the Ingleburn Village nominates eight cottages as being significant. The following statement of significance is included in the listing:

The group of three Riley-Newsum prefabricated cottages on the southern side of Bass Road illustrate the principal characteristics of the type in their original setting. As a group these cottages are important in illustrating the visual character of a village streetscape using the CA4 handed plans and varying setbacks, enhanced by a repetition of regular forms and design motifs including prominent gables, common fabric and uniform design creating a strong visual pattern on sloping terrain.

The five Amals Sagverks Aktiebolag (ASA) cottages in Flinders and Blaxland Road illustrate the principal characteristics and siting of their type including three different siting options, together with the simple rectangular form, pitched gabled roof and external brick chimney. The single storey Riley Newsum and Amals Sagverks Aktiebolag cottages are set in a park like landscape with mature plantings of native trees which highlight the simple geometry and vernacular materials of the cottages, which contribute to the suburban character.



Figure 4: Riley Newsum cottages



Figure 5: Amals Sagverks Aktiebolag cottages

It should be noted that there are now only five of these cottages remaining: three Riley-Newsum cottages on the southern side of Bass Road (Figure 4) and two Amals Sagverks Aktiebolag on the northern side of Flinders Crescent (Figure 5).

3.2 CAMPBELLTOWN CITY COUNCIL

The Mess Hall, Ingleburn Army Camp and Mont St Quentin Oval, including entry gates are both included in Schedule 1 of Campbelltown (Urban Area) Local Environmental Plan 2002.

3.3 LIVERPOOL CITY COUNCIL

Schedule 5 Of the Liverpool City Council Local Environmental Plan 2008 has a listing for the Ingleburn Village site (also known as Bardia Village) and lecture hall building. The Statement of Significance on the inventory form for the item is as follows:

There is the potential to gain more information on the site from further architectural, archaeological and documentary research.

The Recommended Management guidelines on the inventory form acknowledges the significance of the Village.

Schedule 5 Of the Liverpool City Council Local Environmental Plan 2008 has a listing for the Ingleburn Military Heritage Precinct The Statement of Significance on the inventory form for the item is as follows:

Ingleburn Army Camp demonstrates the military history of the Ingleburn Area. It contains the State's first training camp for battalions serving in the Second World War. It provides representative examples of military architectural styles from the late 1930s through to present times and indicates a level of technical achievement in their design, construction and layout. The camp is associated with many important Australian units who, having trained here, served in some of the nation's major engagements of World War II. It is further associated with the numerous men and women who worked at the camp during WWII and after.

Aesthetically the camp is set within an attractive, informally laid out landscape featuring many mature trees and other planting interspersed amongst the various building groups. As a whole it forms a notable and attractive landmark of the Campbelltown Road thoroughfare. There is the potential to gain more information on the site from further architectural, archaeological and documentary research.

4 STATUTORY CONSIDERATIONS

4.1 NSW HERITAGE ACT 1977

The NSW Heritage Act sets out the guidelines for the management of Heritage within NSW. The objects of this Act are as follows:

- (a) *to promote an understanding of the State's heritage,*
- (b) *to encourage the conservation of the State's heritage,*
- (c) *to provide for the identification and registration of items of State heritage significance,*
- (d) *to provide for the interim protection of items of State heritage significance,*
- (e) *to encourage the adaptive reuse of items of State heritage significance,*
- (f) *to constitute the Heritage Council of New South Wales and confer on it functions relating to the State's heritage, and*
- (g) *to assist owners with the conservation of items of State heritage significance.*

Inclusion on the State Heritage Register provides legal protection as a heritage item under the NSW Heritage Act. Neither the former Ingleburn Army Camp site nor any individual items within it are listed in the NSW State Heritage Register.

4.2 DIRECTOR GENERAL'S REQUIREMENTS – PART 3A CONCEPT PLAN

In accordance with Section 75F of the Environmental Planning and Assessment Act 1979, the Director General's Requirements for the subject site are outlined below.

Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with Assessing Heritage Significance (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.

4.3 CAMPBELLTOWN (URBAN AREA) LOCAL ENVIRONMENTAL PLAN 2002

The Mess Hall at Ingleburn Army Camp and Mont St Quentin Oval, including entry gates, are included in Schedule 1 of Campbelltown (Urban Area) Local Environmental Plan 2002.

Division 2 of C(UA)LEP provides objectives and provisions relating to heritage conservation.

Division 2 Conservation of heritage items - 43 Objectives of the heritage provisions

The objectives of this part of the C(UA)LEP are stated as follows:

- (a) *to conserve the environmental heritage of the City of Campbelltown, and*
- (b) *to conserve the heritage significance of existing significant fabric, relics, settings and views associated with the heritage significance of heritage items and heritage conservation areas, and*

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- (c) *to ensure that archaeological sites and places of Aboriginal heritage significance are conserved, and*
- (d) *to allow for the protection of places which have the potential to have heritage significance but are not identified as heritage items, and*
- (e) *to ensure that the heritage conservation areas throughout the City of Campbelltown retain their heritage significance.*

4.4 LIVERPOOL LOCAL ENVIRONMENTAL PLAN 2008

The Ingleburn Village site and lecture hall building and the Ingleburn Military Heritage Precinct are included in Schedule 5 of Liverpool Local Environmental Plan 2008.

Part 5 Clause 5.10 of LLEP provides objectives and provisions relating to heritage conservation:

Part 5 Clause 5.10 Heritage Conservation – Clause 5.10(1) Objectives

The objectives of this part of the LLEP are stated as follows:

- (a) *to conserve the environmental heritage of Liverpool, and*
- (b) *to conserve the heritage significance of heritage items and heritage conservation areas including associated fabric, settings and views, and*
- (c) *to conserve archaeological sites, and*
- (d) *to conserve places of Aboriginal heritage significance.*

4.5 CAMPBELLTOWN (SUSTAINABLE CITY) DEVELOPMENT CONTROL PLAN 2009

Section 2.11 of the DCP contains provisions for heritage conservation. Clause 2.11.2 relates specifically to non-indigenous heritage. Its Design Requirements are as follows:

a) *Any development application made in respect to development on land that is:*

- i) *occupied by heritage item; or*
- ii) *adjoining land occupied by a heritage item; or*
- iii) *located within a heritage conservation area,*

shall have regard to the Articles of 'The Burra Charter' (published by Australia ICOMOC) and the provisions of any relevant Study or Conservation Management Plan.

- b) *Any development on land occupied by an item of heritage, land in the vicinity of a heritage item or land located within a heritage conservation area shall be designed by a suitably qualified person.*
- c) *A 'heritage impact statement' shall be submitted with a development application relating to land that is occupied by or directly adjoining a heritage item.*

4.6 CAMPBELLTOWN CITY COUNCIL DEVELOPMENT CONTROL PLAN NO.83

Campbelltown City Council Development Control Plan No. 83 is also known as the Heritage Policy. It has the following objectives:

- To assist in the conservation of Campbelltown's heritage items;
- To encourage an awareness and understanding of local heritage conservation;
- To provide incentives for the conservation of a heritage item;
- To provide guidelines for the development, change and use of a heritage item;
- To indicate when a development application is required;
- To indicate when supporting information is required to accompany a development application.

4.7 LIVERPOOL DEVELOPMENT CONTROL PLAN 2008

Part 1 Clause 17 of the DCP is devoted to Heritage and Archaeological Sites.

The objective of the clause is to provide additional guidance on the preservation of heritage items and archaeological sites. The clause contains a series of controls:

1. Where a proposal involves a heritage item, or is in the vicinity of a heritage item it will be necessary to lodge a Heritage Impact Assessment.
2. A development application must be prepared in accordance with the conservation guidelines of The Burra Charter and The Conservation Plan.
3. All development of heritage items and development within conservation areas must be designed by a Registered Architect.
4. Development in the vicinity of a heritage item shall be designed to be compatible with the heritage item in terms of :
 - Density and setbacks;
 - Landscaped area;
 - Building design, streetscape and layout;
 - Landscaping and fencing;
 - Car parking and access.
5. The Council may grant consent to carry out development involving the excavation or filling of land or the erection (involving disturbance of land) or demolition of buildings on land which is in an archaeological site that has non-Aboriginal significance or a potential archaeological site that is reasonably likely to have non-Aboriginal significance only if:
 - It has considered and archaeological report; and
 - It is satisfied that any necessary excavation permit required by the Heritage Act 1997 has been granted.

5 PROPOSED WORK

5.1 PROJECT DESCRIPTION

Precinct Context and Distinguishing Characteristics

Edmondson Park South is one of the first precincts to be released in the South West Sector. The precinct is unique, distinguished by very significant cultural and environmental areas. This includes the Ingleburn Army base, the first purpose designed military parade and training grounds in NSW. There conservation areas that include Cumberland Plain Woodland as well as important indigenous archaeological remnants. In addition the government has funded a new rail station as part of the South West Rail Link initiative.

The overall Precinct has the potential for 7,500 lots, local retail, schools, services and jobs. The Edmondson Park Concept Plan will deliver the first part of the larger Edmondson Park Precinct including 3,200 dwellings.

The Concept Plan area master plan has been designed to integrate with the broader precinct to create a community that is distinctive and well connected with a high quality of public domain including streets, public places, culturally significant places, parks and conservation areas, and a high quality private domain of housing, shops, and community and education facilities.

The Concept Plan site is approximately 420 hectares (320 ha south of the South West Rail Link and 100ha north of the Rail Link) which is over half of the Edmondson Park Precinct. The Concept Plan will deliver the town centre with a new railway station on a significant regional park in the heart of the broader Edmondson Park Precinct, as well as dwellings and two schools.

The Edmondson Park South Concept Plan site comprises the Town Centre to the immediate north and south of the rail station as well as residential areas largely to the south, with two schools as well as significant Cumberland Plain Woodland conservation areas. The site extends north from the Hume Highway to the south. The site is bounded by Zouch Road to the west.

The urban design and development principles driving the planning and development of the site are as follows:

Town centre focus of activity

- A focus of business and community activity in the Town Centre with a mix of retail, commercial and community uses adjacent to the main rail/ bus interchange providing employment opportunities and meeting the business services and retail needs of the community.
- The urban and built form of the Town Centre has a main street focus and is pedestrian friendly.
- Transit oriented, accessible and connected development
- Higher density housing is provided within walking distance of the Town Centre, rail station and bus/rail interchange.
- Public transport and arterial roads upgrades give access connections to and from other business centres, employment lands and community facilities in surrounding localities.
- A hierarchy of roads and paths provide clear and convenient access links throughout the precinct and particularly between key urban places.
- A cycleway network link destination points and open spaces.

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- Creation of a safe walkable community.

Community places

- A series of community spaces with distinct identity is embedded in the urban structure.
- Community and social infrastructure is incorporated into the precinct including multi-purpose community facilities, three schools, regional and local neighbourhood parks and public art.
- A series of memorable and enduring 'community places' are provided as the basis for local identity and community building.
- Streets and public spaces are designed for formal and informal social engagement.
- A safe and secure environment is provided with high levels of passive surveillance of the public domain.

Parklands of native bushland

- The new 150 hectare Regional Park conserves CPW and providing recreation activities.
- A conservation open space network is established comprising multiple local neighbourhood parks and open spaces incorporating existing significant vegetation and ecological communities.

Heritage interpretation

- Significant places and items of heritage are retained, and interpretation and celebration of heritage values and adaptive re-use of European heritage structures proposed to contribute to an ongoing sense of identity and understanding of the place. The items of heritage significance are the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and entry gates. Three Riley-Newsum prefabricated cottages are to be relocated to another part of the site while two Amals Sagverks Aktiebolag cottages that are to be demolished will be archivally recorded. Two heritage items, the Kitchen/Dining complex (also known as the Mess Hall) and the Lecture Hall Building, are not proposed for retention because the items are to be demolished by Defence under Commonwealth approval processes prior to the transfer of the land to Landcom.
- Important indigenous heritage elements are preserved in open spaces.

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6 ASSESSMENT OF HERITAGE IMPACT

6.1 NSW HERITAGE OFFICE MODEL QUESTIONS

The assessment of heritage impacts has been undertaken in reference to the model questions given in the NSW Heritage Office's publication *Statements of Heritage Impacts*. The relevance of the model questions to the proposed Part 3A Concept Plan is assessed in the following table:

Demolition of a building or structure	√
Minor partial demolition	X
Major partial demolition	X
Change of use	X
Minor additions	X
Major Additions	X
New development adjacent to a heritage item	√
Subdivision	√
Repainting	X
Re-roofing/re-cladding	X
New services	X
Fire upgrading	X
New landscape works and features	X
Tree removal or replacement	X
New signage	X

The Part 3A Concept Plan establishes the overall planning framework for the site, which includes land use type and distribution, a mix of housing types and densities (approximately 3,200 dwellings), concept location of the new Edmondson Park Town Centre, which will provide retail and commercial floor space, identification and location of open space, environmental conservation lands and local recreation facilities. It also includes the road layout, various utilities components and Bushfire Asset Protection Zones. Interpretation of European and Aboriginal heritage located on the site is allowed for in the Concept Plan. 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.

This assessment of impact is not based on detailed building design through articulated building form, materials and finishes, but rather a Concept Plan (3A) and subdivision layout.

Demolition of a Building or Structure

Q. Have all options for retention and adaptive reuse been explored?

A. *In broad terms the proposed Part 3A Concept Plan consists of a road network and allocates land uses across the entire site. Consent is also being sought for the relocation of three pre-fabricated cottages and the archival recording and demolition of other pre-fabricated cottages associated with the Ingleburn Village. Demolition of the two cottages listed as heritage items is supported because the structural system used in*

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their construction will be compromised by relocation and because of the large amount of asbestos cement that they contain.

The Concept Plan ensures the retention of the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and gates, which are to be integrated into the overall development of the site. The process of integration will include appropriate adaptive reuse and interpretation.

It should be noted that the Department of Defence will be demolishing the Lecture Hall to the north of the Ingleburn Military Heritage Precinct, and the former Mess Hall located to the south west of the Mont St Quentin Oval (refer to Figure 3) prior to the transfer of the site to Landcom. These demolitions do not form part of the Concept Plan application.

Q. Can all of the significant elements of the heritage item be kept and any new development be located elsewhere on the site?

A. *The Part 3A Concept Plan extends across the entire site, thus occupying the entire area included in Liverpool Council's heritage listing for the Ingleburn Army Camp. The Ingleburn Military Heritage precinct and the Mont St Quentin Oval and gates are to be retained and conserved. The relocation of selected representative prefabricated houses from the Ingleburn Village will be investigated.*

The application for the Concept Plan seeks consent for the demolition of a limited number of heritage items.

Q. Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?

A. *Any proposal for the actual demolition of heritage items will only come from subsequent applications. This application seeks consent in principle to demolish the remaining two prefabricated cottages identified as heritage items. Relocation of the two cottages is not practicable because of the nature of the way the buildings were constructed and because of extensive use of fibro in their construction. It is proposed to relocate three prefabricated houses and adapt them for reuse in the future.*

Q. Has the advice of a heritage consultant been sought? Have the consultant's recommendations been implemented? If not, why not?

A. *Heritage issues have been discussed with Tanner Architects, heritage consultants. Cox Richardson developed the Concept Plan recognising places of heritage significance and the important sense of identity and interpretation that they will provide.*

New Development Adjacent to a Heritage Item

Q. How is the impact of the new development on the heritage significance of the item or area to be minimised?

A. *The proposed Part 3A Concept Plan outlines indicative land uses and site work. It does not include any proposal for buildings or structures. However, it includes recommendations for a mix of dwelling types, ranging from single detached dwellings to attached dwellings and high density residential development. The potential impacts of future development in the Part 3A Concept Plan on heritage items are restricted to mixed use functions and construction of attached dwellings and detached dwellings, thus providing control over height and bulk in the vicinity of the items. Whilst the development will have an impact on the Ingleburn Village, this is addressed by the relocation of three prefabricated cottages and archival recording of the village site.*

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Overall the impacts have been minimised through appropriately scaled building height proportionate to their proximity to the heritage precinct.

Q. Why is the new development required to be adjacent to a heritage item?

A. *The whole of the Edmondson Park Precinct has been released for urban development by the Minister for Planning. The former Ingleburn Army Camp forms part of the site and is the subject of a “delayed” rezoning by Liverpool City Council and Campbelltown City Council. The Concept Plan has been prepared to secure statutory approval from the overall planning framework for the site and to resolve several outstanding issues. The heritage items identified in the Liverpool Council Environmental Plan 2008 and the Campbelltown (Urban Area) Local Environmental Plan 2002 are an integral component of the Edmondson Park Precinct.*

Q. How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?

A. *The envelope of development documented in the Part 3A Concept Plan is supported in part by the Liverpool Development Control Plan 2008 Part 2.11 Land Subdivision and Development in Edmondson Park. It is anticipated that future Campbelltown City Council development controls will also support the Concept Plan. The scale and form of permissible development in the envelope surrounding the retained heritage items will ensure that an appropriate curtilage is established to protect the heritage items and their setting within the development.*

The Department of Defence has identified a curtilage for the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and entry gates (Figure 6). While the curtilage for the Precinct is consistent with the curtilage effected by the Concept Plan, it is considered to be inadequate for the Mont St Quentin Oval. The Concept Plan provides, through the street layout in this part of the site, a far better curtilage outcome. The Oval and gates will be integrated into a District Park, which will provide an open space curtilage around the item and integrates it meaningfully into the Concept Plan.

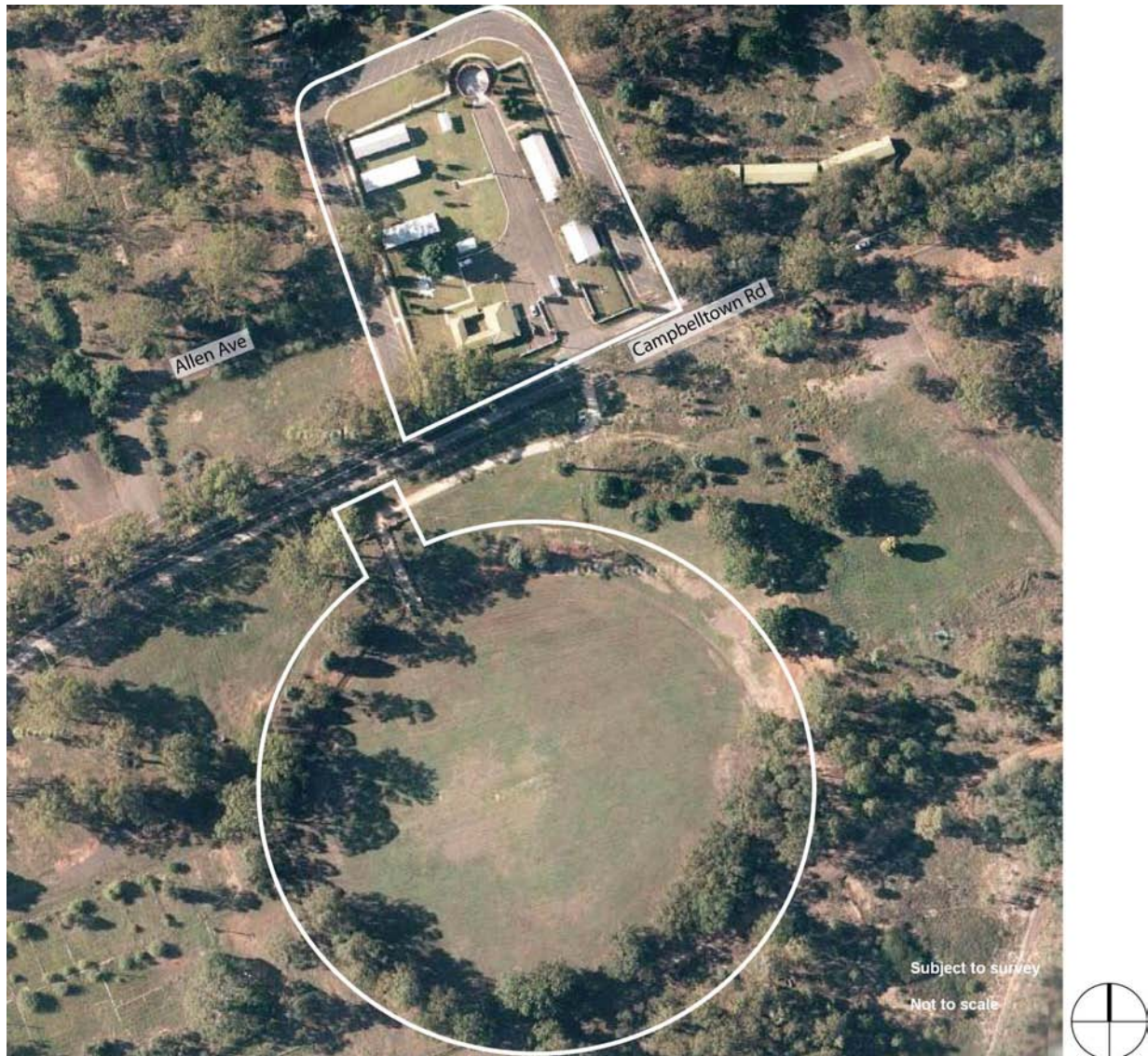


Figure 6: The Department of Defence curtilage for the Ingleburn Military Heritage

Precinct and the Mont St Quentin Oval and entry gates

Q. How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?

A. *The principal public views of the retained heritage items - the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and gates, are currently available from Campbelltown Road. These items have a significant historical and physical relationship to each other, which is demonstrated by the alignment of the entries to both items and the spatial continuity that extends between the Heritage Precinct and the Oval. These heritage items are intended to act as a focal point for the Plan, providing valuable interpretation devices and community assets. Implementation of the Part 3A Concept Plan will have in the future a positive impact on views to these items, allowing them to be viewed from a variety of vantage points. It should be noted that*

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both are integrated into the integrated network of open space areas and corridors across the site, thus maintaining a sense of their relationship with the original open setting that the Defence site provided.

Q. Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?

A. *The proposed application is for a concept plan and a residential subdivision, which considers only indicative building controls. The former Ingleburn Army Camp is considered to have a very low potential for substantial sub-surface European Archaeological features (Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001, p.121). An Indigenous Archaeology report has been prepared for the Concept Plan application and should be referred to separately. At the time where the detailed applications are lodged for individual developments and buildings, the appropriate measures will be taken to ensure that any archaeological significance is adequately protected in line with the relevant Council local environmental plans and development control plans.*

Q. Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?

A. *The proposed concept is considered to be sympathetic to the retained heritage items and their setting, providing a curtilage and controls over the type of development that will be permitted in the vicinity of the heritage items.*

Q. Will the additions visually dominate the heritage item? How has this been minimised?

A. *The Part 3A Concept Plan will have no immediate impact on the heritage items. The impact of future development will be minimised by application of the controls recommended by the Concept Plan and by the development*

Q. Will the public, and users of the item, still be able to view and appreciate its significance?

A. *The retention of the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and gates as discrete and unencumbered items within the site will ensure that the public can experience and appreciate the heritage items. Their relationship to each other will be maintained, which will ensure that the public can understand the essence of their original relationships. The relocation and adaptive reuse of the three Riley-Newsum pre-fabricated cottages will provide another layer of experience for the public and users, and further add to an appreciation of the site's heritage significance.*

Subdivision

Q. How is the proposed curtilage allowed around the heritage item appropriate?

A. *The curtilage around the heritage items, which is defined by the layout of existing and proposed roads, will provide a defined boundary and a necessary amount of open space surrounding the items. The open space provided by the roads will be supplemented the type of residential development permitted by the Concept Plan and by Campbelltown and Liverpool Councils' building controls for Edmondson Park*

Q. Could future development that results from this subdivision compromise the significance of the heritage item? How has this been minimised?

A. *No. The Concept Plan clearly identifies the type of development that will be permitted in the vicinity of the heritage items in the future.*

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Q. Could future development that results from this subdivision affect views to, and from, the heritage item? How are negative impacts to be minimised?

A. *The retention of the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and gates as discrete and unencumbered items within the site will ensure that the public can experience and appreciate the heritage items. These heritage items will be key components of an interpretation strategy for the site. Their relationship to each other will be maintained, which will ensure that the public can understand the essence of their original relationships. The Concept Plan clearly identifies the type of development that will be permitted in the vicinity of the heritage items in the future.*

6.2 LOCAL ENVIRONMENTAL PLANS

The Minister for Planning is not bound by the provisions of Local Environmental Plans in relation to a major project in accordance with section 75R(3) of the Environmental Planning and Assessment Act 1979. The Minister may however take into account the provisions of an environmental planning instrument that would otherwise apply. Despite this, the Director General's general requirements require the proposal to address the planning provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002 and the Liverpool Local Environmental Plan 2008.

CAMPBELLTOWN (URBAN AREA) LOCAL ENVIRONMENTAL PLAN 2002

The proposal has been assessed against the relevant heritage requirements of the Campbelltown (Urban Area) Local Environmental Plan 2002:

CAMPBELLTOWN (URBAN AREA) LEP 2002 REQUIREMENTS	COMPLIANCE COMMENTS
<p>44 Protection of heritage items and heritage conservation areas</p> <p>44(1) When is consent required?</p> <p>The following development may be carried out only with development consent:</p> <ul style="list-style-type: none"> (a) demolishing or moving a heritage item or a building, work, relic, tree or place within a heritage conservation area, (b) altering a heritage item or a building, work, relic, tree or place within a heritage conservation area by making structural or non-structural changes to its exterior, such as to its detail, fabric, finish or appearance, (c) altering a heritage item by making structural changes to its interior, (d) disturbing or excavating a place of Aboriginal heritage significance or an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed, (e) moving the whole or a part of a heritage item, (f) erecting a building on, or subdividing, land on which a heritage item is located or which is within a heritage conservation area. 	<p><i>This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Part 3A Concept Plan.</i></p> <p><i>Refer to the response to the NSW Heritage Office Model Questions</i></p>
<p>44(4) What must be included in assessing a development application?</p> <p>Before granting a consent required by this clause, the consent authority must assess the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</p>	

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CAMPBELLTOWN (URBAN AREA) LEP 2002 REQUIREMENTS	COMPLIANCE COMMENTS
<p>44(5) What extra documentation is needed?</p> <p>The assessment must include consideration of a <i>heritage impact statement</i> that addresses at least the following issues (but is not to be limited to assessment of these issues, if the heritage significance concerned involves other issues). The consent authority may also decline to grant consent until it has considered a <i>conservation management plan</i>, if it considers the development proposed should be assessed with regard to such a plan.</p> <p>The minimum number of issues that must be addressed by the heritage impact statement are:</p> <p>(a) for development that would affect a heritage item:</p> <ul style="list-style-type: none"> (i) the heritage significance of the item as part of the environmental heritage of the City of Campbelltown, and (ii) the impact that the proposed development will have on the heritage significance of the item and its setting, including any landscape or horticultural features, and (iii) the measures proposed to conserve the heritage significance of the item and its setting, and (iv) whether any archaeological site or potential archaeological site would be adversely affected by the proposed development, and (v) the extent to which the carrying out of the proposed development would affect the form of any historic subdivision. 	<p><i>This Heritage Impact Statement provides and evaluation of the impacts of the proposal on the significance of the heritage items concerned.</i></p> <p><i>(i) The proposal will ensure the conservation of the Mont St Quentin Oval and gates.</i></p> <p><i>(ii) The proposal will allow the Mont St Quentin Oval to be conserved and enhanced by means of integrating the items into the overall development of Edmondson Park and celebrating their heritage significance.</i></p> <p><i>(iii) The Concept Plan provides a curtilage for the Mont St Quentin Oval and a recommendation for the type of development in its vicinity.</i></p> <p><i>(iv) It is understood that the site of the former Ingleburn Army Camp has low archaeological potential. The proposal consists of a Concept Plan and subdivision plan, which will not require any site disturbance.</i></p> <p><i>(v) The Army Camp site was not part of a historic subdivision.</i></p>

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CAMPBELLTOWN (URBAN AREA) LEP 2002 REQUIREMENTS	COMPLIANCE COMMENTS
<p>48 Development affecting known or potential archaeological sites of relics of non-Aboriginal heritage significance</p> <p>(1) Before granting consent for development that will be carried out on an archaeological site or a potential archaeological site of a relic that has non-Aboriginal heritage significance (whether or not it is, or has the potential to be, also the site of a relic of Aboriginal heritage significance), the consent authority must:</p> <p>(a) consider a heritage impact statement explaining how the proposed development will affect the conservation of the site and any relic known or reasonably likely to be located at the site, and</p> <p>(b) be satisfied that any necessary excavation permit required by the Heritage Act 1977 has been granted.</p> <p>(2) This clause does not apply if the proposed development:</p> <p>(a) does not involve disturbance of below-ground deposits and the consent authority is of the opinion that the heritage significance of any above-ground relics would not be adversely affected by the proposed development, or</p> <p>(b) is integrated development.</p>	<p><i>Impacts relating to Aboriginal heritage are the subject of a separate specialist consultant's report.</i></p> <p><i>It is understood that the site of the former Ingleburn Army Camp has low non-Aboriginal archaeological potential. The proposal consists of a Concept Plan and subdivision plan, which will not require any site disturbance.</i></p> <p><i>The detail of future development and its likely impacts are not required to be resolved at this concept stage.</i></p>
<p>49 Development in the vicinity of a heritage item</p> <p>(1) Before granting consent to development in the vicinity of a heritage item, the consent authority must assess the impact of the proposed development on the heritage significance of the heritage item and of any heritage conservation area within which it is situated.</p> <p>(2) This clause extends to development:</p> <p>(a) that may have an impact on the setting of a heritage item, for example, by affecting a significant view to or from the item or by overshadowing, or</p> <p>(b) that may undermine or otherwise cause physical damage to a heritage item, or</p> <p>(c) that will otherwise have any adverse impact on the heritage significance of a heritage item or of any heritage conservation area within which it is situated.</p> <p>(3) The consent authority may refuse to grant any such consent unless it has considered a heritage impact statement that will help it assess the impact of the proposed development on the heritage significance, visual curtilage and setting of the heritage item.</p> <p>(4) The heritage impact statement should include details of the size, shape and scale of, setbacks for, and the materials to be used in, any proposed buildings or works and details of any modification that would reduce the impact of the proposed development on the heritage significance of the heritage item.</p>	<p><i>Refer to the response to the NSW Heritage Office Model Questions in Section 6.2 above. This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Part 3A Concept Plan.</i></p> <p><i>The Part 3A Concept Plan provides indicative controls only.</i></p>

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LIVERPOOL LOCAL ENVIRONMENTAL PLAN 2008

The proposal has been assessed against the relevant heritage requirements of the Liverpool Local Environmental Plan 2008:

LIVERPOOL LOCAL ENVIRONMENTAL PLAN 2008	COMPLIANCE COMMENTS
<p>Part 5 Clause 5.10 Heritage Conservation – Clause 5.10(2) Requirement for consent</p> <p>Development consent is required for any of the following:</p> <ul style="list-style-type: none"> (a) demolishing or moving a heritage item or a building, work, relic or tree within a heritage conservation area; (b) altering a heritage item or a building, work, relic, tree or place within a heritage conservation area, including (in the case of a building) making changes to the detail, fabric, finish or appearance of its exterior, (c) altering a heritage item that is a building by making structural changes to its interior, (d) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed, (e) disturbing or excavating a heritage conservation area that is a place of Aboriginal heritage significance, (f) erecting a building on land on which a heritage item is located or that is within a heritage conservation area, (g) subdividing land on which a heritage item is located or that is within a heritage conservation area. 	<p><i>(a) The applications do not include demolition of any heritage items. If this action is contemplated in the future it will be the subject of a separate application.</i></p> <p><i>(b, c) The applications do not include alterations to built heritage items either externally or internally.</i></p> <p><i>(d) The applications do not involve disturbance of known or potential archaeological sites.</i></p> <p><i>(e) Places of Aboriginal significance are the subject of a separate report.</i></p> <p><i>(f) The application for the Concept Plan does not include an application for consent to construct buildings.</i></p> <p><i>(g) The part 3A Concept Plan describes an indicative road layout and future uses across the site.</i></p>
<p>5.10(4) Effects on heritage significance</p> <p>The consent authority must, before granting consent under this clause, consider the effect of the proposed development on the heritage significance of the heritage item or heritage conservation area concerned, This subclause applies regardless of whether a heritage impact statement is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</p>	<p><i>This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Part 3A Concept Plan.</i></p>
<p>5.10(5) Heritage impact assessment</p> <p>The consent authority may, before granting consent to any development on land:</p> <ul style="list-style-type: none"> (a) on which a heritage item is situated, or (b) within a heritage conservation area, or (c) within the vicinity of land referred to in paragraph (a) or (b), <p>require a heritage impact statement to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</p>	<p><i>Refer to the response to the NSW Heritage Office Model Questions in Section 6.2 above. This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Part 3A Concept Plan.</i></p>

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LIVERPOOL LOCAL ENVIRONMENTAL PLAN 2008	COMPLIANCE COMMENTS
<p>5.10(7) Archaeological sites</p> <p>The consent authority must, before granting consent under this clause to the carrying out of development on an archaeological site (other than land listed on the State Heritage Register or to which an interim heritage order under the <i>Heritage Act 1977</i> applies):</p> <p>(a) notify the Heritage Council of its intention to grant consent, and</p> <p>(b) take into consideration any response received from the Heritage Council within 28 days after the notice is sent.</p>	<p><i>Issues relating to Aboriginal archaeology are the subject of a separate report. The possibility of non-Aboriginal archaeological remains on the site is considered to be low.</i></p>

6.3 DEVELOPMENT CONTROL PLANS

The Minister for Planning is not bound by the provisions of Local Environmental Plans in relation to a major project in accordance with section 75R(3) of the Environmental Planning and Assessment Act 1979. The Minister may however take into account the provisions of an environmental planning instrument that would otherwise apply. Despite this, the Director General's general requirements require the proposal to address relevant statutory provisions, which include the provisions of the Campbelltown (Sustainable City) Development Control Plan 2009, Campbelltown City Council Development Control Plan No. 83 and the Liverpool Development Control Plan 2008.

CAMPBELLTOWN (SUSTAINABLE CITY) DEVELOPMENT CONTROL PLAN 2009

Clause 2.11 of the DCP contains provisions for heritage conservation.

CAMPBELLTOWN (SUSTAINABLE CITY) DCP 2009	COMPLIANCE COMMENTS
<p>2.11.2 Non-Indigenous Heritage</p> <p>Design Requirements</p> <p>a) Any development application made in respect to development on land that is:</p> <p style="padding-left: 20px;">i) occupied by a heritage item; or</p> <p style="padding-left: 20px;">ii) adjoining land occupied by a heritage item; or</p> <p style="padding-left: 20px;">iii) located within a heritage conservation area,</p> <p>shall have regard to the Articles of 'The Burra Charter' (published by Australia ICOMOS) and the provisions of any relevant Study or Conservation Management Plan.</p> <p>b) Any development on land occupied by an item of heritage, land in the vicinity of a heritage item or land located within a heritage conservation area shall be designed by a suitably qualified person.</p> <p>c) A 'heritage impact statement' shall be submitted with a development application relating to land that is occupied by or directly adjoining a heritage item.</p>	<p>a) <i>The Part 3A Concept Plan includes identified heritage items. It does not involve modification to the Mont St Quentin Oval and gates. The Concept Plan integrates the Mont St Quentin Oval into the overall development. The former Mess Hall is to be demolished by the Department of Defence.</i></p> <p>b) <i>The Part 3A Concept Plan was designed by the firm of Cox Richardson Architects, which has wide experience in Urban Planning that includes heritage listed sites.</i></p> <p>c) <i>This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Part 3A Concept Plan.</i></p>

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CAMPBELLTOWN CITY COUNCIL DEVELOPMENT CONTROL PLAN No. 83: HERITAGE POLICY (1997)

Part 3 of the DCP contains heritage guidelines.

CAMPBELLTOWN CITY COUNCIL DEVELOPMENT CONTROL PLAN No. 83: HERITAGE POLICY	COMPLIANCE COMMENTS
<p>Assessment</p> <p>A development application must be prepared in accordance with the conservation guidelines <i>The Burra Charter</i> and <i>The Conservation Plan</i>.</p>	<p><i>This Statement of Heritage Impact has been written in conformity with the general structure set out in the NSW Heritage Manual, prepared by the NSW Heritage Office and the Department of Planning.</i></p>
<p>Design Principles and Elements</p> <p>The design of any proposed development should not lessen the significance of a heritage item. New development should be compatible and complementary.</p> <p>Design principles to be considered include:</p> <ul style="list-style-type: none"> • the use of recessive/neutral elements so as the significance of a heritage item is retained and enhanced. • the recognition of architectural and landscape elements (style and design) • the interpretation of architectural and landscape elements, where appropriate, in a modern way. • the views to and from the site. • the streetscape. • the creation of a sense of place. <p>Design should not:</p> <ul style="list-style-type: none"> • detract from or compete with the significance of a heritage item. • compete for visual attention. • obscure the significance of a heritage item. • generally mimic/copy architectural style/design. • overdevelop the site. 	<p><i>The part 3A Concept Plan describes an indicative road layout and future uses across the site.</i></p> <p><i>The design principles are not applicable because there is no building proposed in the Concept Plan.</i></p>
<p>Subdivision and Residential Development</p> <p>Often heritage items are located on large blocks of land or are part of new urban areas. Where subdivision or residential development is proposed, a suitable curtilage must be identified for the heritage item in a Conservation Plan before any residential area is nominated for development. In assessing a suitable curtilage, the significance of a heritage item must not be compromised.</p>	<p><i>A Conservation Plan has not been prepared. However, the Concept Plan provides an appropriate curtilage for the Mont St Quentin Oval, which has been adopted in the Stage 1 Project Application. The Oval will allow interpretation of the heritage significance of the site and will continue to be used in an appropriate manner.</i></p>

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LIVERPOOL DEVELOPMENT CONTROL PLAN 2008

The Liverpool Development Control Plan contains general provisions for heritage and archaeological sites and a restricted number of heritage provisions for Edmondson Park.

LIVERPOOL DCP 2008	COMPLIANCE COMMENTS
<p>Part 1.1 General Controls for all Development</p> <p>Clause 17. Heritage and Archaeological Sites</p> <p>Sub clause: Controls:</p> <ol style="list-style-type: none"> 1. Where a proposal involves a Heritage item, or is in the vicinity of a heritage item it will be necessary to lodge a Heritage Impact Assessment. 2. A development application must be prepared in accordance with the conservation guidelines of 'The Burra Charter' and 'The Conservation Plan'. 3. All development of heritage items and development within heritage conservation areas must be designed by a Registered Architect. 4. Development in the vicinity of a Heritage Item shall be designed to be compatible with the Heritage Item in terms of: <ul style="list-style-type: none"> • Density and Setbacks. • Landscaped Area. • Building Design, Streetscape and Layout. • Landscaping and Fencing. • Car parking and access. 5. The Council may grant consent to carry out development involving the excavation or filling of land or the erection (involving disturbance of land) or demolition of buildings on land which is an archaeological site that has non-Aboriginal significance or a potential archaeological site that is reasonably likely to have non-Aboriginal significance only if: <ul style="list-style-type: none"> • It has considered an archaeological report; and • It is satisfied that any necessary excavation permit required by the Heritage Act 1997 has been granted. 	<p><i>This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Part 3A Concept Plan.</i></p> <p><i>The Part 3A Concept Plan was designed by the firm of Cox Richardson Architects, which has wide experience in Urban Planning that includes heritage listed sites.</i></p> <p><i>The proposed application is for a concept plan and a residential subdivision, which considers only indicative building controls.</i></p> <p><i>The proposed application is for a concept plan and a residential subdivision, which considers only indicative building controls and site works. The application also seeks consent for the demolition of buildings across the site, including two heritage items (the Amals Sagverks Aktiebolag pre-fabricated cottages) and the relocation of three heritage items (the Riley-Newsum pre-fabricated cottages) to another part of the site.</i></p> <p><i>Demolition of the Lecture Hall is to be carried out by the Department of Defence following Commonwealth processes and is not part of the application.</i></p>
<p>Part 2.11 Land Subdivision and Development in Edmonson Park</p> <p>Clause 1 Preliminary</p> <p>Sub clause: Objectives</p> <p>a) To facilitate urban design that responds to the physical, cultural and urban heritage of the area.</p>	<p><i>The Concept Plan acknowledges the Ingleburn Military Heritage Precinct and incorporates it as a key component of the overall planning scheme. While the road layout of the Ingleburn Village is not retained in the Plan it will be included in an interpretation strategy for the site. Selected dwellings may be relocated within an open part of the site</i></p>

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LIVERPOOL DCP 2008	COMPLIANCE COMMENTS
<p>Cause 2.1 Street Network and Access</p> <p>Sub clause: Street Hierarchy</p> <p>Campbelltown Road: This road will be subject to further detail design by the RTA. Access to Campbelltown Road will be via service roads or alternate roads. The design should encourage the retention of existing mature trees along the corridor and retain the existing heritage items.</p>	<p><i>The Concept Plan complies with this sub clause by retaining the Ingleburn Military Heritage Precinct. While the Concept Plan does not physically affect the site, its implementation will have an impact on the Ingleburn Village, the southern boundary of which is formed by Campbelltown Road.</i></p> <p><i>It is intended to widen Campbelltown Road to accommodate four lanes of traffic. This widening is considered acceptable and will have minimal impacts in terms of its effects on the Ingleburn Military Heritage Precinct.</i></p> <p><i>Widening to accommodate a wider road reserve (that is, a reserve of 45 to 50 metres as proposed by the RTA) is not supportable because of impacts on both heritage items. Additional traffic lanes would erode the relationship between the site of each item (which historically has always been relatively narrow). Additional lanes would compromise the important historical and physical relationships between the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and entry gates.</i></p>

7 DIRECTOR GENERAL'S REQUIREMENTS AND HERITAGE BRANCH REQUIREMENTS

7.1 DIRECTOR GENERAL'S REQUIREMENTS

The Director General's Requirements are:

Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with Assessing Heritage Significance (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.

It should be noted that the document Assessing Heritage Significance (NSW Heritage Office 2001) provides guidelines for the evaluation and assessment of the potential heritage significance of items. In the case of the former Ingleburn Defence Site the heritage significance of the place and individual components within its boundaries have already been assessed. Assessments include the Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001 and the Register of the National Estate and local government listings for the place.

This Statement of Heritage Impacts has followed the guidelines set out in the NSW Heritage Office's publication *Statements of Heritage Impacts*, which provides model questions to assist in determining what impacts a development may have on a heritage item or place.

This Statement of Heritage Impact has addressed the Director General's requirements for heritage as follows:

- This Statement of Heritage Impact provides a detailed evaluation of any impacts that the development may have on the significance of the site.
- The findings of this assessment conclude that the proposed Part 3A Concept Plan for Edmondson Park demonstrates compliance with the Heritage Act 1977, the heritage impact assessment guidelines published by the NSW Heritage Office and the heritage provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002 and the Liverpool Local Environmental Plan 2008. There is also compliance with the relevant Development Control Plans of both local government authorities.

The 3A Concept Plan provides opportunities for the adaptive reuse of heritage items:

- The Mont St Quentin Oval has been integrated into the design of the site and is an important component of public open space. Its use as a park and oval is appropriate, while the visual connections between the Oval and the Ingleburn Military Heritage precinct are to be maintained;
- The Ingleburn Military Heritage Precinct is to be retained and conserved. The strategy for achieving conservation is to identify adaptive reuse by appropriate individuals or organizations. Potential users include community groups and clubs such as the RSL;
- It is recommended that three Riley-Newsum prefabricated cottages are relocated to an open part of the site (a local park) and used for community purposes.

7.2 HERITAGE BRANCH REQUIREMENTS

The NSW Heritage Branch recommended inclusion of several requirements for cultural heritage, which include assessing the consistency of the proposal with recommendations included in several reports. The reports that consider European heritage are:

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- Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001;
- Heritage Concepts Pty Ltd, South West Rail Link Environmental Assessment – Technical Paper 7: Preliminary Assessment of Historical Archaeological and Cultural Heritage Values, 2006;
- HLA Envirosciences, Non-Indigenous Heritage Assessment: Edmonson Park, NSW, 2003;
- AMBS, South West Rail Link – Glenfield to Leppington Rail Line: Historic Heritage Impact Assessment, 2010.

The NSW Heritage Branch has also asked for:

- A detailed Heritage Interpretation Strategy and specific site works proposed throughout the precinct to implement interpretation of the Ingleburn Army Camp, to be prepared and submitted for comment by the Heritage branch before commencement of construction;
- An assessment of the suitability of the Ingleburn Army Camp (or part of it) for nomination and listing on the NSW State Heritage register to be provided to the Heritage Branch prior to commencement of construction.

Godden Mackay Logan: Ingleburn Defence Site Heritage Analysis June 2001

This report was commissioned by the Department of Defence Major Property Disposal Unit to assist in future planning.

The NSW Heritage Branch requires assessment of the consistency the proposal with the significance assessment and conservation policies contained in this document, along with investigation of any opportunities for adaptive reuse of the Ingleburn Army Camp (or part of it) including its functions, layout and setting and interpretation of its former defence uses in relevant parts of the precinct.

Section 7.4 of the Ingleburn Defence Site Heritage Analysis consists of a Summary Statement of Significance for the Defence Site:

The Ingleburn Defence Site, which was, from 1939 to the 1970s, one of Australia's major army camps, is a place of considerable historic significance. The site played a central role in the mobilization of Australia's citizens and their military training throughout World War II and was the first purpose-built infantry training camp for World War II. It was the assembly point for the first military contingent assembled for overseas service in World War II and is associated with training for the Korean and Vietnam Wars and the anti-conscription movement.

Ingleburn Defence site is of social significance as it is a symbol of the service given by the generations of soldiers who trained here and as a place where respect for and remembrance of that service has become a continuity and highly valued tradition.

Fir several generations of NSW men, and a smaller number of women, Ingleburn Defence Site is of social significance as a place that was formative in their lives, shaping their values and outlook. It is a place with long associations with a State-wide 'Army community', and is a place where this sense of "Army community" is expressed, celebrated and passed on.

Ingleburn Defence site is of social significance for the local community as a landmark that symbolizes the important historical and contemporary role played by the Army within the area and as a community meeting place, where links were forged between civilians and Army.

The remaining buildings on the Ingleburn Defence Site are representative examples of standardized barracks and support structures, which were erected in rapid response to the training demands of World War II.

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Remnant bushland within the Ingleburn Defence Site includes rare surviving Cumberland Grey Box Woodland, a plant community of high scientific significance.

The Heritage Analysis Report recommended the establishment of the Ingleburn Military Heritage Precinct, which “is intended to act as a National Memorial, to provide a focus for memorial and commemorative days, to cater for private visits and community use, to provide a point of focus of the site and to help to establish a site development theme.”

The Heritage Analysis report evaluated the heritage significance of the elements (including buildings) that then existed across the Defence Site. Many of these have since been demolished.

Section 9.3: Significance Management Guidelines

This part of the report recommended that items of exceptional significance should be retained and conserved by appropriate zoning and management:

- Recommended that items of high significance should be retained and conserved in their current location. If retention is not feasible they should be archivally recorded prior to any disturbance.
- Recommended that items of some significance should be considered for retention according to their particular circumstances or archivally recorded prior to removal
- Recommended that items of low significance may be retained or removed as required. It is desirable that they are archivally recorded prior to removal.
- Items of no significance may be removed unless required for ongoing operational practical reasons. They do not require archival recording.

Item	Ranking of Significance	Status
Cumberland Plain Woodland	Exceptional Significance	Retained as Conservation Areas in the 3A Concept Plan
Memorials	Exceptional Significance	Most memorials are now situated in the Ingleburn Military Heritage Precinct.
Mont St Quentin Oval and Entry Gates.	High Significance.	Heritage listed; to be retained and conserved.
Bardia Barracks and Entry Gates.	High Significance	Form part of the Heritage Precinct; to be retained and conserved.
Lecture Hall Building	High Significance	Heritage listed; Defence Department to demolish.
Trees along Campbelltown Road.	High Significance	Existing trees will be retained wherever possible. Replacement planting as needed will accompany road widening.
Mont St Quentin Mess and Dining Hall Complex	Some Significance	Heritage listed; Defence Department to demolish
Cottages Ingleburn Village Group	Some Significance	Many have been demolished; eight cottages have been heritage listed but only five of these survive. Of these, three cottages to be retained and relocated, two to be archivally

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Item	Ranking of Significance	Status
		recorded and demolished.
Regenerating Bushland	Some significance	To be retained where possible.
Site structure and layout	Some significance	To be removed.
Bambi Kindergarten Korean War Memorial.	Some significance	Memorial to be relocated into the Heritage Precinct; Bambi Kindergarten to be demolished.
Bardia Parade Ground	Some significance.	Parade ground to be incorporated into a bushland conservation area.
1950s barracks	Low significance	Most demolished; surviving buildings in the Heritage Precinct
Transport Compounds	Low significance	Removed/demolished.
Cottages H Block Residential Group	Low significance	Demolished.
Amenities Buildings	No significance	Demolished.
Sheds	No significance	Demolished
Wishing Well	No significance	
Brick bungalows	No significance	Demolished
Sewage treatment plant	No significance	Consent is sought for its decommissioning.
Horse paddocks	No significance	Not to be retained.

Section 9.4 contains guidelines for individual items. Compliance with the relevant guidelines is summarized below:

Management Guideline	Response
<p>9.4.1 Site structure, Layout and Names</p> <p>The site structure and layout of the Ingleburn Defence site can best be retained through retention and incorporation of existing roads and major landscape elements into future site use proposals. ... The primary objective should be that the place should still be identifiable and "familiar" for those to whom it is important.</p>	<p>Whilst the design of the Concept Plan precludes retention of some existing roads, important features such as the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval are integrated into the proposal. These significant features embody commemoration of the site's important historical associations and provide identity.</p>
<p>9.4.4 Trees Along Campbelltown Road</p> <p>The plantings of Forest Red Gum, Grey Box and other trees along Campbelltown Road should be retained where feasible. Where necessary, replanting with new plants of similar species should occur in order to retain a tree-lined drive and marker of the extent of the Ingleburn Defence Site.</p>	<p>Trees will be retained where possible during the widening of Campbelltown Road. Restricting widening to four traffic lanes minimizes potential impacts on trees (and heritage items located on Campbelltown Road). Replanting will be carried out using appropriate species.</p>

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Management Guideline	Response
<p>9.4.5 Memorials</p> <p>Memorials and their associated garden setting should generally be retained and conserved.</p> <p>Provision should be made for the continuing use of the Memorials for commemorative services. This involves ensuring adequate space for gatherings is available.</p> <p>Provision should be made for the addition of other memorials from units associated with the Ingleburn Defence Site.</p> <p>Adequate site security and maintenance should be provided to the Memorials.</p>	<p>Memorials in the Ingleburn Military Heritage Precinct are to be retained.</p> <p>The Korean War Memorial, currently located near the Bambi Kindergarten, will be relocated to the Heritage Precinct.</p> <p>It is anticipated that commemorative services will continue to be held within the Precinct.</p>
<p>9.4.6 Bardia Barracks Precinct</p> <p>Bardia Barracks is a precinct that contains a number of elements of particular significance, some of which ... should be retained. It is therefore appropriate that other associated elements also be retained.</p>	<p>Ingleburn Military Heritage Precinct was established as an outcome of the Godden Mackay Logan recommendations and includes the built items and memorials recommended in the Heritage Analysis report. The precinct is to be retained and conserved.</p>
<p>9.4.7 Lecture Hall Building</p> <p>The Lecture Hall Building is an individually significant building in the Ingleburn site. It is appropriate that this building, as well as its setting, is retained. A viable adaptive reuse for the building should be identified which is compatible with the heritage values of the building.</p>	<p>The Department of Defence is to demolish the Lecture Hall. This demolition is not part of the Concept Plan application.</p>
<p>9.4.3 Chowne Club (Building Demolished)</p> <p>The name 'Chowne' should continue to be commemorated on the site (and, ideally, the names of all World War II Victoria Cross recipients).</p>	<p>The name "Chowne" plus those of World War II Victoria Cross recipients should be incorporated into the interpretation strategy for the site.</p>
<p>9.4.9 Bambi Kindergarten</p> <p>The memorial at the Bambi Kindergarten should be conserved in its present location, or relocated in association with the other memorials.</p> <p>Future decisions about the Bambi Kindergarten as an activity and community facility will be subject to the commercial viability of the activity. However, retention of the name 'Bambi Kindergarten' in association with this activity in the Ingleburn area would be desirable.</p>	<p>The Korean War Memorial, which is near the Kindergarten, is to be relocated within the Ingleburn Military Heritage Precinct.</p> <p>The retention of the name "Bambi Kindergarten" should form part of the interpretation strategy for the site and its use should be encouraged for a pre school facility within the site.</p>

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Management Guideline	Response
<p>9.4.10 Former Parade Ground and Playing Fields</p> <p>The Mont St Quentin Oval, including its entry gates and flagpole position, should be retained. The visual character of the oval should be maintained through retention of the Campbelltown Road tree plantings and the visual link with the Bardia entry area. The World War II connection should be interpreted (ideally by return of memorial plaques to their original position). The name 'Mont St Quentin' should be retained.</p> <p>The Bardia Parade Ground has some significance and warrants consideration for retention, if possible. This may be achieved by keeping its overall form/shape. If this occurs, the former use should be interpreted on site.</p>	<p>The Mont St Quentin oval is to be retained and conserved. It forms an important component of the open space in the Concept Plan.</p> <p>The Bardia Parade ground will be included in the conservation area this is part of the regional park on the site. Interpretation of the parade ground should be included in the interpretation strategy for the site.</p>
<p>9.4.11 Ingleburn Village</p> <p>The Ingleburn Village (Married Quarters Precinct) has great consistency in its built fabric and historical associations. The Village is of some significance as a group of representative structures and has some value as a conservation area, however, the extent of demolition of individual buildings has compromised this overall quality ...</p> <p>While the retention of the Ingleburn Village may be desirable on heritage grounds alone, it is not essential. It is recognized that planning decisions must also consider other factors, including the economic circumstances of the Village and the overall site planning for the area. If a decision is taken that requires the demolition of the houses in the Village, representative examples of the buildings as well as the street layout of buildings should be archivally recorded prior to the commencement of this work.</p>	<p>Retention of the Village cannot be achieved in the Concept Plan. It should be noted that its integrity has been compromised by the demolition of many houses.</p> <p>However, it is recommended that an archival recording is made of the place, and that selected prefabricated houses are relocated in an open part of the site. The buildings should form part of the interpretation strategy for the site and should be sensitively adapted for reuse.</p>
<p>9.4.12 Representative Buildings</p> <p>... Specifically, it is suggested that at least two examples of Sydney Williams Barracks and one Kitchen/Dining Hall complex be retained.</p>	<p>The vast majority of Sydney Williams Barracks have been demolished since the report was written.</p> <p>The remaining Kitchen/Dining Hall is to be demolished by the Department of Defence and is not part of the Concept Plan application.</p>
<p>9.4.13 On-Site Interpretation</p> <p>The history and significance of the Ingleburn Army Camp should be interpreted at the Ingleburn defence site, once it is vacated by the Department of Defence. Interpretation should recognize the historic significance of the place and could be in a simple form (such as a plaque) or a more complex medium such as an exhibition or museum.</p>	<p>An interpretation strategy should be prepared for the site. The Ingleburn Military Heritage Precinct provides an opportunity for an interpretation centre. Other locations for interpretive devices include public open space, community facilities and the Edmondson Park railway station.</p>

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Management Guideline	Response
<p>9.5.1 History Project</p> <p>A history of the site (which includes oral history), should be commissioned to address the great social and historic significance of the site. The history project should include a component which addresses the use of standard buildings on site, including collection and consideration of historic plans, site plans and construction drawings for the standard building types.</p> <p>The history should ideally be published as a book.</p> <p>In addition, the history project would provide a useful resource for appropriate on or offsite interpretation of the Ingleburn Army Camp.</p>	<p>Consideration should be given to this recommendation as part of the interpretation strategy.</p>
<p>9.5.2 Archival Recording</p> <p>Prior to their removal, elements of some (or greater) significance should be archivally recorded. Consideration should also be given to archival recording of typical examples of elements of low significance or intrusive elements., depending on particular circumstances. Archival recording of the Bardia Barracks and the former Hospital have already been completed.</p> <p>Archival recording should comply with the standard recommended for elements or items of local heritage significance in the NSW Department of Urban Affairs and Planning's Guidelines for Archival Recording.</p> <p>As part of the archival recording process, a search should be made of Department of Defence records for plans of the standard building units on the site (i.e. Sydney Williams Barracks and mess halls), and copies of those drawings should form part of the archival records. In the event that these drawings cannot be located, representative examples of the buildings (which are standard units) should be photographically recorded during demolition so that their construction details can be documented.</p> <p>Copies of the archival records produced should be lodged with the department of Defence, the Mitchell Library, and both Liverpool City and Campbelltown City Council.</p>	<p>Archival recording should be undertaken as matter of course before development commences and prior to the demolition or relocation of any buildings or structures.</p>

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Heritage Concepts Pty Ltd, South West Rail Link Environmental Assessment – Technical Paper 7: Preliminary Assessment of Historical Archaeological and Cultural Heritage Values, 2006

This report was commissioned to undertake a historic archaeological and cultural heritage assessment of the impacts associated with the proposed South West Rail Link. The NSW Heritage Branch requires assessment of the consistency of the proposal with the recommendations contained in this document.

Section 6.0 of the report is a Preliminary Statement of Heritage Impacts. Identified impacts on built elements of what was termed the Ingleburn Military Area north and south of Campbelltown Road include:

- Potential impact resulting in the loss of military landscaping and planning relating to the domestic/residential life of army dependants;
- The possible loss of examples of building types associated with military married quarters;
- Visually the South West Rail Link would have a major indirect impact on the aesthetic qualities of the area.

The 3A Concept Plan has the same potential heritage impacts.

Section 7.0 of the report contains Assessment and Mitigation recommendations. The Assessment recommendations are not applicable to the Part 3A Concept Plan that is the subject of this report. However, certain mitigation recommendations may be applicable.

Management & Mitigation Recommendation	Response
Proposed work with the potential to impact upon the former Ingleburn Military Camp should refer to the relevant policies and procedures outlined in the Ingleburn Defence Site Heritage Analysis (Godden Mackay Logan 2001)	Refer to the previous section of this report.
A referral will be submitted if required for the Commonwealth listed former Ingleburn Military Camp.	This recommendation is not considered appropriate. 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.

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HLA Envirosiences, Non-Indigenous Heritage Assessment: Edmonson Park, NSW, 2003

HLA-Envirosiences Pty. Ltd was commissioned by Liverpool City Council on behalf of Campbelltown City Council and other landowners to undertake a study on Non-Indigenous Heritage. The NSW Heritage Branch requires assessment of the consistency the proposal with the recommendations contained in this document.

The assessment of heritage significance for the study area in the report drew on the evaluation of the Godden Mackay Logan (GML) 2001 Heritage Analysis. Section 5 of the report contains management guidelines and a Conservation strategy for the Ingleburn Army Camp is outlined in Section 5.3.

Conservation Strategy Clause	Response
<p>5.3.1 Objectives</p> <p>At the Ingleburn Army Camp, the GML report identified an area containing National Estate values relating to non-natural heritage, which encompassed part of the Bardia Barracks, Mount St Quentin Oval and a representative Mess Hall/Dining Hall (shown on GML 2001 Figure 9.1). This was later defined as the Ingleburn Military Heritage Precinct and added to the Interim list of the Register of National Estate. Similarly the Ingleburn Village was added to the Interim list of the Register of National Estate.</p> <p>However, it is important to understand that the whole Ingleburn Army Camp was assessed as having high heritage significance but that much of the heritage outside the listed areas is expressed through associations with historical events and social significance rather than through the extant physical fabric.</p> <p>Taking this into account there are three broad conservation objectives that can be developed:</p> <ul style="list-style-type: none"> • Conservation of key items of the physical fabric within the Ingleburn Military Heritage Precinct. • Conservation of the physical fabric of examples of the prefabricated cottages at Ingleburn Village. • Development of unique design vocabulary that refers in some way to the history and memories of the broader site, the Ingleburn Army Camp and maintains the sense of the area being different. 	<p>All of the items contained within the Ingleburn Military Heritage Precinct are to be retained and conserved. Appropriate adaptive reuse of the buildings is to be investigated to ensure ongoing maintenance and conservation.</p> <p>It is recommended that representative examples of the prefabricated cottages are relocated to an open part of the site.</p> <p>The detailed design of buildings and structures falls outside the scope of the Concept Plan. However, consideration may be given to incorporating design vocabulary guidelines in planning instruments associated with the site.</p>

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Conservation Strategy Clause	Response
5.3.2 Development Provisions	
<p>5.3.2.1 Ingleburn Military Heritage Precinct</p> <p>The objective is to conserve and interpret key items of the significant fabric within the Ingleburn Military Heritage Precinct to ensure its long-term survival for current and future generations.</p> <p>The key to achieving this aim is to encourage active use of the precinct that acts to generate ongoing maintenance of the buildings and structures on their sites but does not impact on the significance of the precinct.</p> <p>New fabric in the Bardia Barracks area (to the north of Campbelltown Road) could be accommodated in the periphery of the area as the site focuses on a central core along Allen Street. Such fabric would have to complement the existing buildings in its scale, proportion, shape, materials and colour.</p> <p>The Mount St Quentin Oval could be used as a sports venue. It is likely that some facilities may be needed to support the use of the oval such as change rooms, fences and the like. The design of these should reflect the previous and existing buildings at Ingleburn in terms of their scale, proportion, shape, materials and colour although obviously in a modern form. There would be no objection if a building from an area outside the two heritage areas is moved to the Mount St Quentin Oval to act as a facility such as a change rooms, as there is ample precedent from other military sites where this occurred and the buildings were after all designed to be relatively portable.</p> <p>The Lecture Hall at the northern end of the precinct should be considered for adaptive reuse as recommended in the GML report (2001:117).</p>	<p>The Ingleburn Military Heritage precinct is being retained and conserved. An active use is needed to ensure its ongoing viability and conservation. Uses that may be appropriate include:</p> <ul style="list-style-type: none"> • Community facilities, which would encourage the residents and visitors to the site to understand and appreciate the heritage significance of the site; • Club use. For example, the RSL or a military organisation would be appropriate and maintain links between the site and the military. <p>The Mount St Quentin Oval is an important component of the Concept Plan and has been identified as a strategic park. It has been integrated into the planning of open space throughout the site. Any buildings associated with recreational use at the Oval should acknowledge the design of former military buildings in this part of the site.</p> <p>The Defence Department is intending to demolish the Lecture Hall.</p>

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Conservation Strategy Clause	Response
<p>5.3.2.2 Prefabricated Buildings Ingleburn Village</p> <p>The objective is to conserve and interpret the significant fabric of key examples of the Prefabricated Buildings Ingleburn Village to ensure their long-term survival for current and future generations. The key to achieving this aim is to encourage active use of the buildings in such away that acts to generate on-going maintenance of the buildings and structures on their sites but does not detract from their significance.</p> <p>In the broader Masterplanning context however, the retention of the buildings in situ is in conflict with the identified planning outcomes and proposed Edmondson Park Town Centre. In the balance of competing interests, which the Masterplanning entails, retention of the buildings and settings is not considered desirable if the boarder aims for the site as a whole are to be achieved. The question is how to manage this site to maintain the objective of conserving and interpreting the significant fabric of the Prefabricated Buildings.</p> <p>In reviewing the assessment of significance there are two elements discussed, the significance. of the buildings as rare survivors of their type of standard designs and prefabrication, and the significance of their setting. It is recommended that a combination of archival recording and relocation will achieve the objectives for the conservation of the prefabricated buildings.</p> <p>There are three Riley-Nesum houses (in Bass Road) and five Amals Sagverks Aktiebolag houses (in Flinders and Blaxland roads) listed. The first stage of the process would be</p> <ul style="list-style-type: none"> • To undertake a thorough condition survey to identify the most structurally sound example. • To engage the services of an appropriate structural engineer/architect to outline a methodology for the relocation of an example of each type at a suitable location. • To undertake an archival recording following the NSW Heritage Office Guidelines "<i>How to prepare archival recording of Heritage Items</i>", noting that Schedule C would apply to these buildings. It would be suitable to record in detail on of each type and record the remaining types to identify variations of the underlying design. <p>The relocated buildings would need to be located at a suitable place where their physical condition would be maintained. It would not be necessary to retain the residential function of the buildings although appropriate reuse is preferred to ensure the on-going viability of the structures.</p> <p>Appropriate referrals to the Australian Heritage Commission or to Environment Australia would have to be made prior to any works commencing.</p>	<p>It is acknowledged that the Concept Plan, which is supported by Liverpool Council planning instruments, precludes the retention and preservation of the prefabricated buildings in situ. Part of the significance of the buildings relates to their setting, which has been compromised by the demolition of many other houses in the Ingleburn Village.</p> <p>This report recognizes the conflicts inherent in retaining the cottages and achieving the aims of the Concept Plan.</p> <p>The recommendations of the report are supported. Representative houses should be relocated to an open part of the site and organized so that their original relationships to the site and each other can be interpreted. The process of relocation should be undertaken in association with specialist engineers and conservation practitioners to ensure appropriate methods. The buildings should be adaptively reused for community purposes. Residential use is not recommended because of the compromises that would need to be made to the buildings to bring them up to acceptable contemporary standards.</p> <p>An archival recording of the Ingleburn Village should be undertaken prior to the removal of the selected houses.</p> <p>The possibility of locating the dwellings near the Mont St Quentin Oval and sensitively adapting them for reuse associated with the Oval should be investigated.</p> <p>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.</p>

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Conservation Strategy Clause	Response
<p>5.3.2.3 Remaining areas of the Ingleburn Army Camp</p> <p>The objective is the development of unique design vocabulary that refers in some way to the history and memories of the broader site and maintains the sense of the area being different significance.</p> <p>The GML report notes that the site structure and general layout of the site and names of streets and precincts is an important part of the significance of the Ingleburn site (GML 2001:99, 103). The development objective would be to retain the link between the use of the site as the Ingleburn Army Camp and proposed new uses by making sure that:</p> <ul style="list-style-type: none"> • Street patterns are maintained as much as possible (although new streets could be added). • Names of streets and localities are to be maintained and new names have a reference to the past use of the site. • The GML report notes that the trees along Campbelltown Road are seen by the local community as marking the extent of the Ingleburn site and thus recommends their conservation and enhancement (2001:102). The development objective would be to • Conserve Existing trees where possible and replant where required with similar species to retain a tree-lined drive and a marker of the extent of the Ingleburn Army Camp • Plan for the inevitable widening of Campbelltown Road by considering for example whether the road could be widened on either side of the trees leaving a row of trees in the median strip. <p>The Parade Grounds have not been specifically identified as being of importance in the GML report however their retention would serve to mark the various blocks and retain a link between modern usage of the area and the past. The design objective would be to retain the Parade Grounds as public open space or adaptive reuse them for recreation purposes and name them with reference to the Blocks that used them.</p> <p>Overall it should be noted that the building form used at Ingleburn was single-storeyed and narrow and long with a gabled roof. The development objective would be to encourage a similar design form in the areas specifically used for barracks accommodation.</p> <p>The above elements would act to produce an area with a unique feel that reflects its heritage a the Ingleburn Army Camp. It is particularly important to have a smooth transition around the edges of the Military Heritage</p>	<p>It will not be possible to maintain existing street layouts because of the overall concept of the Concept Plan. However, devices such as street names and place names that make specific reference to the history and uses of the site will provide interpretation that is integral to the site.</p> <p>Trees along Campbelltown Rod will be retained where possible. New trees will be planted after road widening has been undertaken to regain the sense of Campbelltown Road as a tree-lined drive and as a defining element for the former Defence site.</p> <p>It is proposed to widen Campbelltown Road to accommodate four lanes of traffic. The widening is essential because of the importance of the road and will not impact on the Ingleburn Military Heritage Precinct. Proximity of the road widening to the Mont St Quentin Oval may necessitate careful demolition and reconstruction of the gates.</p> <p>The parade grounds include the Mont St Quentin Oval, which is being retained, conserved, and integrated into the Concept Plan, and the Bardia Parade Ground, which will be included in the Regional Park.</p> <p>The prescriptive building form that is described is not considered appropriate for the type and scale of development described in the Concept Plan.</p> <p>The Concept Plan allows for residential development and potential school development in the vicinity of the Ingleburn Military Heritage Precinct. These types of development, through detailed controls over building heights, forms and setbacks, have the potential to complement the Heritage Precinct and therefore minimise impacts on it.</p>

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Conservation Strategy Clause	Response
<p>Precinct.</p> <p>The design of development adjacent to these areas should not impact on the heritage significance of these areas by complementing the heritage buildings and landscape through their scale, proportion, shape, detailing and setback. New landscape elements should complement the existing landscape of these areas</p>	

AMBS, South West Rail Link – Glenfield to Leppington Rail Line: Historic Heritage Impact Assessment, 2010

This study area addressed by this report, which was prepared by Australian Museum Business Services, included the Ingleburn Defence site. Impacts on Campbelltown Road and Ingleburn Village are identified inspection 5.3.2 of the report. A significant impact on the form and layout of Ingleburn Village as a whole and an adverse impact on the historic, aesthetic and rarity values of the Riley Newsum and Amals Sagverks Aktieborg prefabricated cottages as integral elements of the village :is identified, arising from the Rail Link footprint on the Defence site.

Section 6 of the report contains mitigation recommendations, of which the following directly relate to the Ingleburn Defence site.

Recommendation	Consistency with recommendation
<p><i>Recommendation 4</i></p> <p><i>A monitoring program for the effects of vibration during construction should be implemented to allow for early detection of unsafe level of vibration in the vicinity of heritage structures, in particular the Upper Canal [not part of the Defence site] and Ingleburn Village. If measured vibration levels are found to have the potential to cause structural damage, constriction equipment and methodologies should be modified so that vibration levels are reduced to a safe level.</i></p>	<p>This recommendation is specific to the South West Rail Link. However, it is recommended that vibration associated with the construction process should be monitored in the vicinity of the heritage items on the site.</p>
<p><i>Recommendation 5</i></p> <p><i>Consideration should be given to a meaningful interpretation of the local history and land use patterns, significant people and places and the development of transportation networks and introduction of utilities. Appropriate locations include Quarter Sessions Road, Glenfield and Edmondson Park Railway Stations and the bridge across the Upper Canal and Cowpasture Road.</i></p>	<p>A heritage interpretation strategy will be prepared for the entire site prior to the commencement of construction.</p>
<p><i>Recommendation 7</i></p> <p><i>An archival recording should be prepared to record the pre-construction residential landscape of the Ingleburn Village Married Quarters Precinct. A copy of the archival record should be deposited with the Bardia Barracks Heritage Precinct for inclusion in interpretation of the Ingleburn Army Camp.</i></p>	<p>It is anticipated that an archival recording will be undertaken prior to work on site commencing.</p>

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<p><i>Recommendation 9</i></p> <p><i>Should relics be exposed during the Project construction process, work will halt at that location. The nominated excavation director should be called in to assess and determine the appropriate management strategy for the relics. Care should be taken in the establishment and post work rehabilitation of stockpile areas to avoid disturbing potential relics.</i></p>	<p>Archaeological supervision should be established at the time that work on the site commences, which includes demolition work. There is no construction work associated with the actual 3A Concept Plan although consent is sought for demolition of a number of buildings.</p>
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Recommendation	Consistency with recommendation
<p><i>Recommendation 10</i></p> <p><i>Archaeological supervision of any excavation (or ground disturbance) associated with construction for the Project should be undertaken in accordance with heritage best practice. Particularly sensitive areas are those in the vicinity of Quarter Sessions Road, Ingleburn Village, the Upper Canal and Cowpastures Road.</i></p>	<p>Archaeological supervision should be established at the time that work on the site commences, which includes demolition work. There is no construction work associated with the actual 3A Concept Plan although consent is sought for demolition of a number of buildings.</p>

Heritage Interpretation Strategy

It is recommended that a detailed heritage interpretation strategy is prepared by recognized heritage conservation practitioners prior to any work commencing on site. The design of the Concept Plan has been mindful of the heritage significance of the site and the incorporation and integration of the heritage items with the overall planning of the site allows heritage interpretation to take a meaningful place in future development.

State Heritage Register Listing

The NSW Heritage Branch has asked for an assessment of the suitability of the Ingleburn Army Camp (or part of it) for nomination and listing on the NSW State Heritage register to be provided to the Heritage Branch prior to commencement of construction.

The Ingleburn Army Camp site will not, in the opinion of the authors of this report, warrant inclusion in the State Heritage Register. This is because a substantial amount of existing development across the site has already been demolished. Further, the Department of defence has made known its intention to demolish the Kitchen/Dining Complex (the Mess Hall) and the Lecture Hall, thus impacting negatively on the significance of the place. The proposed subdivision and subsequent development will effectively obscure the physical open character and extent of the Camp, leaving the Ingleburn Military Heritage Precinct, the Mont St Quentin Oval and entry gates and the three relocated pre-fabricated cottages as tangible objects for interpretation. These items are already given protection by local government heritage listing and inclusion in Local Environmental Plans.

8 CONCLUSION

This report concludes that the proposed Part 3A Concept Plan for Edmondson Park South demonstrates compliance with the Heritage Act 1977, and the Director General's Requirements for the Part 3A application including the heritage impact assessment guidelines published by the NSW Heritage Office and the heritage provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002 and the Liverpool Local Environmental Plan 2008.

The Part 3A Concept Plan presents building type envelopes, landscaping and site works and promotes views to and from heritage items that are generally appropriate. The Ingleburn Military Heritage Precinct and the Mont St Quentin Oval and gates are key elements of the Concept Plan that are integrated into the overall development and will form an important part of an overall interpretation strategy. The Concept Plan will maintain their important historical and visual associations. Relocation of three pre-fabricated Riley-Newsum dwellings from the Ingleburn Village to an open part of the site will enhance interpretation. Demolition of two Amals Sagverks Aktiebolag pre-fabricated dwellings and the Ingleburn Village will be accompanied by an archival recording. There are no heritage impacts associated with the decommissioning of the sewage treatment plant.