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**Department of Defence**  
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DARLINGHURST NSW 2010

PDS 121/2010

Director General  
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Attention: Team Leader, Strategic Assessment

**EDMONDSON PARK – PART 3A PROPOSALS MP10\_0118 AND MP10\_0119**

Reference is made to your letter of 20 September 2010 and the public exhibition of the environmental assessments and concept plan for the proposed Landcom development on land partly owned by Defence in south Edmondson Park.

The Department of Defence owns land directly affected by the proposed development at the former Ingleburn Army Camp, Campbelltown Road. The Stage 1 development proposal affects Lot 2, DP1144667, Lot 1, DP831149, Lot 1, DP831148, Lot 3, DP246213 and Lot 3, DP831152, while the Concept Plan also includes the remaining lots which are Lot A, DP188121, Lot 1 and 2, DP 831152 and Lot 1, DP801456.

As you are aware, the Commonwealth is currently considering a request from the NSW Government, represented by Landcom, for a Priority Sale of the entire Ingleburn Defence site under the provisions of the Commonwealth Property Disposals Policy. A decision on the request is expected in the near future.

Defence has reviewed aspects of the proposal for the listing as a State significant site, the concept plan and the proposed Stage 1 development and offers the following comments.

Defence supports the proposed development as described in Stage 1 and the Concept Plan, subject to the matters described below, and has no objection to the proposal being listed at State significant development under the Major Development State Environmental Planning Policy 2005. The proposal will bring significant regional benefits for housing and conservation, enable development of the rest of the Defence site and act as a catalyst for development of the surrounding Edmondson Park Release Area.

While the development of the Defence site is primarily a matter for consideration by a future owner, Defence is bound by provisions of the Environmental Protection and Biodiversity (EPBC) Act 1999 and decision of the Commonwealth Minister for the Environment in the disposal of the site.

Under the provisions of the EPBC Act, Defence referred the proposed disposal of the Ingleburn site to the Commonwealth Minister for the Environment, Heritage and the Arts in July 2007 (EPBC 2007/3567).

The Minister endorsed the sale on 11 May 2009 subject to conditions which require:

1. The purchaser to conclude a Conservation Agreement with the Commonwealth to protect and conserve the biodiversity of the area.
2. The Conservation Agreement must include the retention and management of areas of Cumberland Plain Woodland.
3. The contract of sale must include a covenant that binds the purchaser to preserve and maintain the Military Heritage Precinct and Mont St Quentin Oval.
4. Defence to complete a condition report for the Kitchen/Dining Hall Complex, the Nissen Hut and the prefabricated cottages prior to the sale.

Conditions 1, 2 and 4 have been met and Condition 3 will be met in the drafting of the contract of sale to the NSW Government.

Conditions 1 and 2 are met by the Conservation Agreement between the Commonwealth and NSW State Governments signed in late 2009. [A Conservation Agreement relating to the Edmondson Park Precinct was signed by the Commonwealth Minister for the Environment, Heritage and the Arts, NSW Minister for Climate Change and the Environment and NSW Minister for Planning under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999.] The Conservation Agreement identifies the areas of biodiversity that are to be protected on the Defence site and states how they will be managed for conservation purposes. The areas of conservation identified in the Agreement are slightly different to those that were zoned for conservation in the Liverpool and Campbelltown Local Environmental Plans (LEPs).

The Concept Plan exhibited as part of the Landcom proposal reflects the requirements of the Conservation Agreement including the additional areas of open space required under the Agreement. It is important that future amendments and approvals for the concept plan continue to reflect the requirements of the Conservation Agreement for the Edmondson Park area.

The contract of sale for the Ingleburn site will include provisions requiring the purchaser to preserve and maintain the Military Heritage Precinct and Mont St Quentin Oval. The Concept Plan exhibited as part of the Landcom proposal reflects the requirements of the Commonwealth Minister's decision to preserve these heritage items. Prior to the disposal of the site, Defence intends to nominate these items for listing on the NSW Heritage Register.

It is important that future amendments and approvals for the concept plan continue to reflect the requirements of the Commonwealth Minister's decision for the Military Heritage Precinct and Mont St Quentin Oval.

Condition 4 has been met and Defence is providing a copy of the condition report to the Department of Sustainability, Environment, Water, Population and Communities. The

Concept Plan proposes the adaptive relocation of three Riley-Newsum pre-fabricated cottages within the proposed open space network. The Concept Plan refers to the removal by Defence of the Mess Hall and Lecture Hall in several places. Defence is currently in the process of seeking approvals for the removal of these Commonwealth and Local Listed heritage buildings which may or may not be forthcoming. Subject to this decision, Landcom may need to seek approval to demolish these two buildings.

The heritage listings described in Section 3.10, Table 6 of the Concept Plan are not correct. In brief, the Ingleburn Army Camp as a whole has never been listed on the Register of the National Estate or the Commonwealth Heritage List; the other items in the table are listed on the Commonwealth Heritage List. Figure 16 also contains errors by mis-naming the prefabricated cottages and confusing the location of the Lecture Hall.

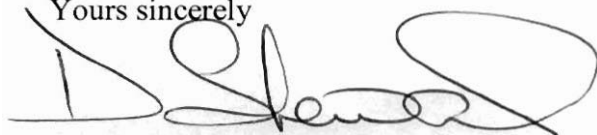
It should also be noted that the Commonwealth Property Disposals Policy requires the Department of Families, Housing, Community Services and Indigenous Affairs to advise on any special provisions to increase housing supply, improve community amenity and create new jobs. This advice has not yet been received by Defence. Such advice would normally be included as conditions in the contract of sale and has the potential to influence the type and nature of the development on the Defence site. Defence can advise the Department of Planning of any requirements when they are received. It is noted that Landcom proposes to include 5% of housing for moderate income earners and 5% of housing for seniors in Edmondson Park South.

The Ingleburn Defence site contains a number of items and areas of Aboriginal archaeological significance. The Stage 1 development and Concept Plan have the potential to impact on these items. Landcom states it will incorporate appropriate interpretation of the European and Aboriginal heritage values of the site into the development. Wherever possible, consistent with proper development of the site, the larger archaeological areas should be incorporated into the open space network without removal or destruction. It should be noted that the aerial extent of the larger sites are not fully reflected in Section 3.11, Figure 17 of the Concept Plan.

Defence is currently undertaking remediation works on the Ingleburn site and these are expected to be completed by mid-November 2010. It is Defence's intention to obtain a Section A Site Audit Statement and Site Audit Report under the Contaminated Land Management Act 1997 confirming that all land on the site is suitable for its intended end use; this should be available in February 2011.

Defence does not anticipate approval for commencement of any development on the Defence site by Landcom prior to the exchange of a contract of sale. Defence would be pleased to discuss this submission or to provide further information if required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Duncan Stewart', written over a light blue horizontal line.

**Duncan Stewart**  
Assistant Director  
Property Disposals

25 October 2010