

**SUBMISSION TO CAMDEN & CAMPBELLTOWN CITY
COUNCILS
For**

Land at Glenlee Precinct, Spring Farm

REZONING REQUEST

Prepared for

Sada Services Pty Ltd, Camden Soil Mix & TRN Group

Prepared by



October 2006

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Preamble

The following definitions have been adopted for the purpose of this report.

The Site – refers to the site comprising the activities associated with Sada Services, Camden Soil Mix TRN Group – refer to **Figure 1**.

The Precinct - refers to the site as described above, including the interface of Jacks Gully and the Mount Annan Botanical Gardens facilities and some of the nearby lands in the ownership of Landcom – refer to **Figure 2**.

The following parties have formally endorsed submission of this application:

- Sada Services Pty Ltd;
- Camden Soil Mix; and
- TRN Group.

Owners of land within the Precinct, although not a party to this application, are aware of its nature and support its general thrust. Their lands are, however, important in the context of precinct level planning.

Section A – Executive Summary

The Glenlee Site is an extensive area of strategically located land with a proud history of coal treatment, handling, emplacement and transshipment and more recently other bulk material and transport activities. The Site is serviced by significant higher order transport infrastructure, which provides a unique opportunity to be capitalised upon.

A time has been reached whereby current activities on-site need to be rationalised as the emphasis of activities shifts. Further, the demand for bulk material handling and transshipment solutions and intermodal demands for Greater Metropolitan Sydney require immediate investment decisions and the securing of longer term strategic opportunities. The Glenlee Site is eminently placed to satisfy some of these requirements.

The Site has long been identified as a future employment/industrial precinct and is most recently reinforced as potentially fulfilling such role in the context of the Metropolitan Strategy (2005). The current Sub-regional Planning Initiatives are likely to reinforce the Precinct as a priority employment lands opportunity.

The immediate capital investment decisions of the bulk materials transshipment and intermodal industries and the inherent potential of the Glenlee Precinct require timely planning actions. The subject Site is zoned rural and in a statutory sense introduces significant limitations to the comprehensive redevelopment of a mixed-use industrial precinct with a heavy industry focus. Approvals must be forthcoming in a timely manner including an appropriate zoning amendment, which more closely reflects the current and past activities and the vision established for the redevelopment of the Precinct.

Preliminary environmental investigations have identified potential environmental impacts associated with redevelopment to be within a manageable order of magnitude. Further, elements of a framework for environmental management have been advanced.

To advance the staged redevelopment of the Glenlee Precinct, Council is requested to prepare a relevant draft Local Environmental Plan for industrial and related purposes, pursuant to the Environmental Planning and Assessment Act 1979 (as amended) and having regard to the 'spot rezoning' guidelines.

In this regard we note the Department of Planning's Circular PS 06-015 issued to all Council's on 15 June 2006 which outlines the Department's current position in respect of 'spot rezoning' requests. The subject rezoning request complies with the relevant criteria for advancement and accordingly should be progressed.

Accordingly, it is recommended that both Campbelltown and Camden Councils endorse this proposal and pursue the necessary statutory steps to rezone the land to permit industrial development and related activities on the Site. In this regard, the proponents have approached the Department of Planning and obtained endorsement of the spot rezoning process. Refer to **Annexure I**.

Section B – Introduction

1.0 Introduction

1.1 General

The Glenlee Site has been largely used for industrial and transport related activities for a period of time dating back to the 1950's. The range of uses has evolved over the intervening years, but always maintaining a similar industrial/transport focus.

The strategic setting of the broader Precinct has led to its constant identification since the days of the Three Cities of Campbelltown Camden and Appin Structure Plan 1973¹ through to the current iteration of the Metropolitan Strategy (2005) and sub-regional planning work, as a Precinct offering significant employment opportunities and the coalescence of higher order rail and road infrastructure.

1.2 The Need to Act

The time has been reached where current activities in the Precinct need to be rationalised and planning with the surrounding proposed urban lands and support uses integrated.

Simultaneously the NSW Government is seeking to develop bulk material transshipment, intermodal and rail strategies; whilst the bulk material and transport industries are seeking to make immediate capital investment decisions. The Glenlee Site and the broader Precinct is eminently placed to satisfy some of these requirements provided planning controls are not seen as an inhibition.

1.3 Current Statutory Planning Environment

The prevailing statutory planning environment will be discussed elsewhere in this report. It is important to note at the outset, however, that the site must ultimately be rezoned and preferably sooner than later.

1.4 Purpose of report

This report has been compiled by Michael Brown Planning Strategies to:

- Outline the nature of the Glenlee Site and current activities;
- Detail the nature of the current statutory planning position;
- Describe the strategic planning context and the NSW Government's bulk materials and evolving transport/freight strategies and rail and road network planning;
- Describe the natural and human environments ;
- Establish a vision and document the development opportunities, their potential impacts and elements of an environmental management framework;

¹ Three Cities Structure Plan 1973 (State Planning Authority)

- To introduce a conceptual Masterplan for the Precinct;
- Identify the opportunities to integrate with the planning and development of surrounding lands and facilities and provide a catalyst for higher order infrastructure investment;
- Flag remediation and embellishment opportunities;
- Describe potential approvals processes; and
- Outline a case for a 'spot rezoning' and a relevant statutory framework.

In summary, the principal purpose of the report is to have both **Camden and Campbelltown Councils resolve to prepare a draft Local Environmental Plan to rezone the Site for industrial and related purposes and to have the Department of Planning support such action.**

1.5 Knowledge and Involvement of Statutory Bodies

Both Camden and Campbelltown Councils and the Department of Planning have been fully briefed on the proponent's aspirations and the need to effect the rezoning of the subject Site and support in principle the general redevelopment concept.

1.6 The Approvals Process

The Approvals Process is detailed later in this report; suffice to suggest in this introduction (the prospects of amendments to existing approvals and the Part 3A process aside) that the adoption of a concept Masterplan and rezoning of the land will set the scene for the staged submission and determination of development applications.

1.7 Planning Focus Meeting

In addition to discussions with the Department of Planning and both Councils, a separate Planning Focus Meeting (PFM) was held with a number of agencies on 21 June 2006 at Camden, including attendance by DoP and both Councils. In attendance were the following agencies:

- Australian Rail Track Corporation
- Camden Soil Mix (neighbour)
- Hawkesbury Nepean Catchment Management Authority
- Integral Energy
- Landcom
- Mount Annan Botanic Gardens (neighbour)
- Roads and Traffic Authority
- TRN Group
- Water Board
- WSN Environmental Solutions (neighbour)

The following agencies were invited but did not attend.

- Department of Environment & Conservation

- Department of Fisheries
- Department of Natural Resources
- Department of Primary Industries (Mineral Resources)
- Railcorp

The PFM identified constraints and opportunities for redevelopment of the Precinct. The object of the PFM was to identify potential redevelopment scenarios and address areas of concern. The outcomes of the PFM will be taken into consideration in the redevelopment of the Precinct.

Section C – Glenlee: The Site, The Precinct and its Context

2.0 Glenlee:

2.1 The Site

The Glenlee (Sada Services Pty Ltd) holding proper comprises some 72ha of variable topography and landuse activity. It includes the foot slopes of Jacks Gully (Waste Disposal and Recycling Facility) and the Mount Annan Botanical Gardens site and escarpment and floodplain relationship with the Nepean River. Various components of this site have been 'benched' so as to provide platforms for building and plant and circulation, together with appropriate gradients for infrastructure. Further, a large tract of the Nepean River Floodplain has historically been 'reclaimed' as an emplacement facility.

The preceding components of the Site are largely devoid of remnant vegetation. The topographically challenging terrain and Nepean River riparian corridor are in contrast ecologically diverse (and provide the inherent opportunity for enhanced subregional ecological corridors).

2.2 Existing Ownership Pattern

The Glenlee Site comprises three principal ownerships. These are described below and shown in **Figure I**.

1. Sada Services Pty Ltd

Lot 1101 DP 883495;
Lot 1 DP 405624; and
Lot 1 DP 250033.

Totalling some 72ha – approximately 45ha of which is useable land. (A further strip approximately 13m in width will be required to be purchased from Landcom on the southern side of the property for future water quality control/riparian corridor development. The exact area is unknown at this stage and will be subject to survey).²

2. Camden Soil Mix

Totalling some 27ha – approximately 20ha of which is useable land.

Lot 1102 DP 883495

3. TRN Group

Totalling some 7.5ha – approximately 6ha of which is useable land.

² It is considered that the Landcom holding Lot X FP 378264 should be included as part of the LES process. This land holding has an area of 45ha; of approximately 30ha is above the 1% AEP Flood Level.

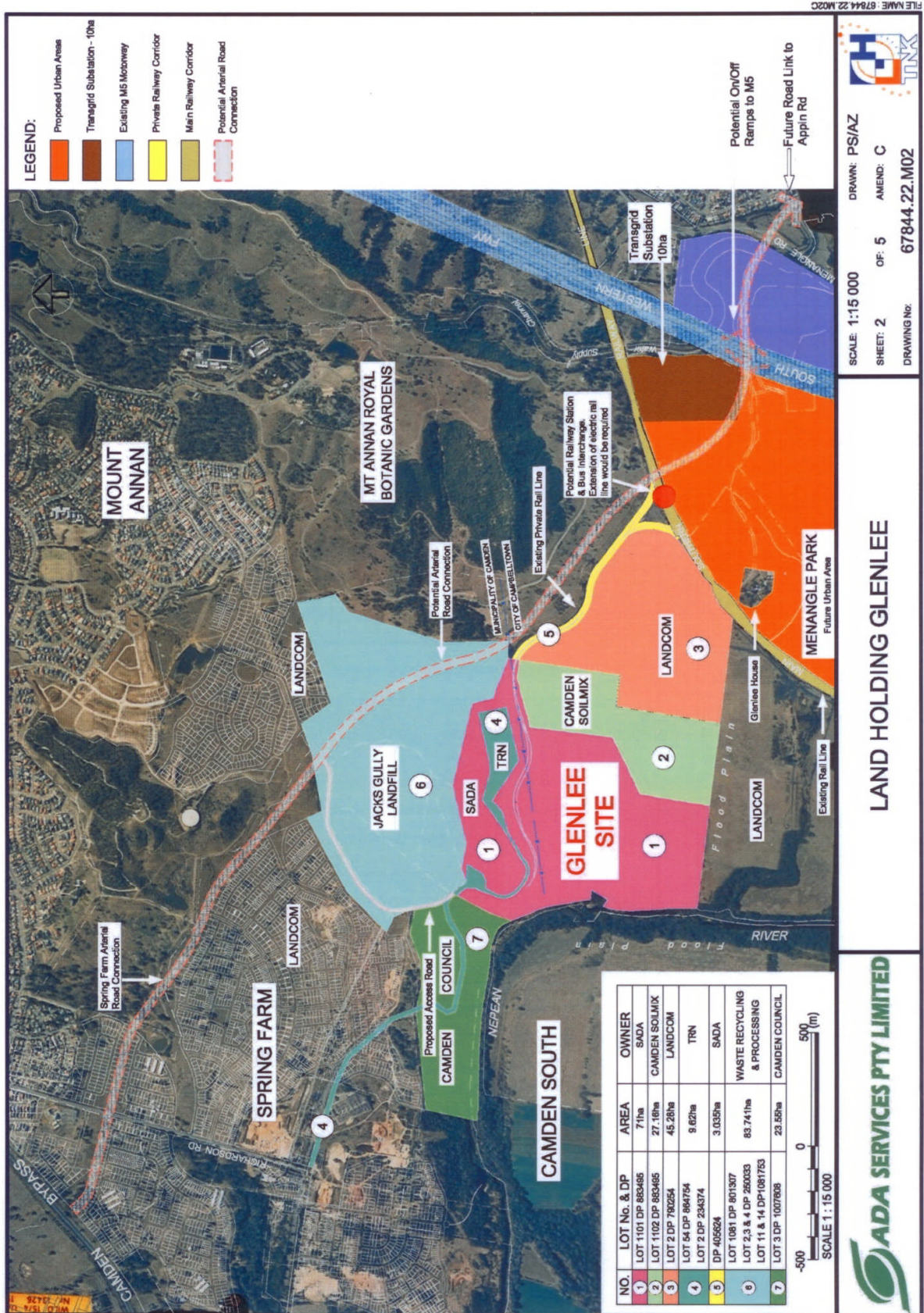


Figure I - Ownership Pattern

2.3 The Context

The Glenlee Precinct in its immediate context is shown in **Figure 2** below. It is some 6 kilometres from Campbelltown and 3.5 and 5 kilometres from Narellan and Camden, respectively.

The Precinct is situated to the immediate west of the South Western Freeway and Main Southern Railway. Southwest of the Mount Annan Botanic Gardens and to the immediate southeast of the proposed Spring Farm Urban Release Area. Further, it is located south of Mount Annan residential area and Jacks Gully Regional Waste Disposal and Recycling Facility and north and east of the Nepean River and its expansive floodplain.

The Precinct is clearly on the fringe of a rapidly expanding urban area and proximate to service infrastructure. Rail access is importantly available to the main Southern Railway, whilst enhanced road access via a connection to the Freeway is an important element in the regional transport strategy at some time in the future. The development of Spring Farm, Menangle Park and other future urban release areas proposed in 'South Macarthur' (Mt Gilead) may provide a catalyst for the strategic linking of the Spring Farm Arterial Road to the F5 Freeway.

The Precinct is strategically located in terms of potential employment lands for the subregion.

The subject site traverses the Camden/Campbelltown local government areas boundary. The greater proportion of developable land is, however, within the Campbelltown Local Government Area.

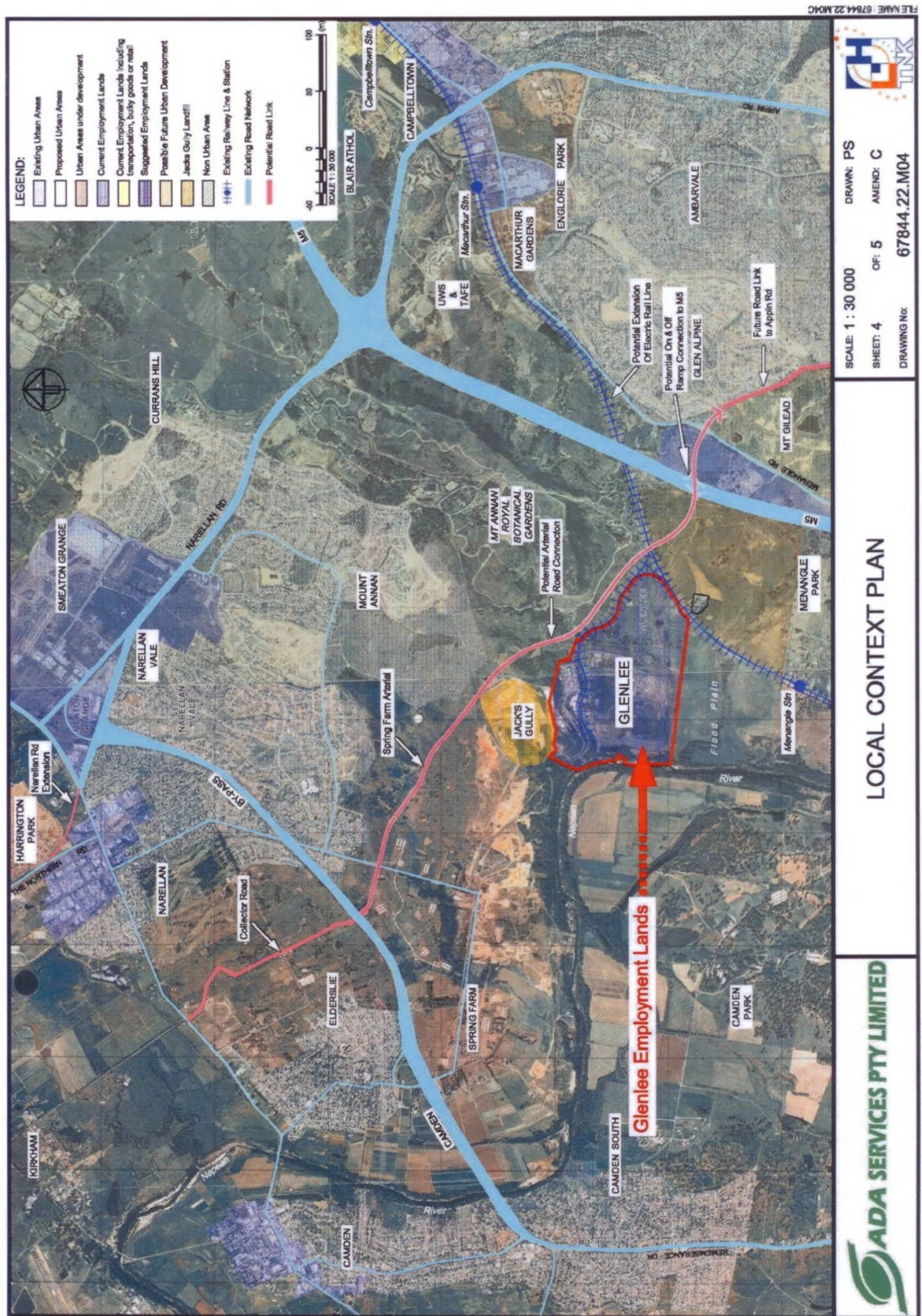


Figure 2 - Local Context Plan

Section D – Existing and Former Landuse Activities

3.0 Landuse

3.1 Historic Landuse Activities

The Glenlee site has a history as a coal washery, transshipment point, tailings facility and recipient reject emplacement, dating back to the 1950's. Coal was 'imported' from the Burragorang Valley mines and after washing loaded onto trains for transport to either Balmain or Port Kembla coal loaders.

In September 1973, development consent was issued for the emplacement of large particle size reject to construct dam walls to retain coal slurry. At the time, the subject property was zoned Rural under the County of Cumberland Planning Scheme.

A new washery was constructed in 1981 as attention turned to recycling the coarse reject material on-site and 'winning' coal from such material for subsequent sale. Also additional capacity was required for externally sourced coal. With further developments in the recycling of reject material, additional capacity was required for a broader product range and increase throughput. Consent to the upgraded washery facility to cater for these demands was issued by Campbelltown City Council in 1995.

Ancillary office, workshop and support infrastructure was developed overtime to meet the increasing and changing demands associated with the washery/recycling and transportation activities. In the 1990's, a major truck depot facility was developed on site on an elevated pad for use by the remnant historic road based coal transport fleet (Heggies Bulkhaul Pty Ltd, now TRN Group).

Similarly, a parcel of land of 27ha was excised during site rationalisation activities, and disposed of to an external party for use as a soil mix/composting facility (Camden Soil Mix).

3.2 Current Landuse Activities

3.2.1 Sada Services Pty Ltd

The principal use of the site (by Sada Services Pty Ltd the dominant landowner) remains focussed upon the receipt of reject material and the processing of such material together with the reprocessing and blending of on-site reject material. Receipt of the material and the transport of product to markets off-site, involves significant heavy vehicle movements. The residue waste is emplaced on site.

The activity also involves the inherent re-contouring and preparation of a final building platform of stabilised reject material. This activity has been associated with an upgrade of plant as previously described and the development and installation of an enhanced environmental management program.

The reprocessing activity is such that it is very market responsive and likely to have a significant timeframe extending from 5 to 10 years.³

Trazblend also operates a moderate sized transport fleet from this property. Sada Services Pty Ltd additionally operates its Head Office for engineering for its State-wide activity from the property.

3.2.2 Camden Soil Mix

Camden Soil Mix operates a soil mixing and embellishing facility. Product material is provided from a combination of raw material blending and composting and sold to the horticultural and landscape industries. Significant heavy vehicle movements are associated with the subject activity. Other administration and service facilities of an ancillary nature are conducted. A draft Local Environmental Plan is significantly advanced in the plan making process with Campbelltown City Council.

3.2.3 TRN Group Earthmoving

TRN Group Earthmoving purchased the elevated former Heggies Bulkhaul Pty Ltd truck depot (located towards the northern side of the property). The site remains in use as a truck depot (including parking, servicing and administration), together with similar activities associated with their major earthmoving activities, and significant heavy vehicle movements are associated with the subject activity.

3.3 Current Infrastructure

3.3.1 Road Access

The site is currently accessed via a private haul road, which joins Springs Road at the corner of Richardson Road. From this point, vehicles travel along Springs Road to the Camden Bypass whereupon they either travel north or south, dependent upon destination. The majority of the vehicles would however, head in a northerly direction.

This road network has been designated as a heavy haulage route since the days of construction of its principal elements; namely the Macarthur Bridge viaduct and Camden Bypass. The local road network and short to long-term road connections is shown in **Figure 3** below.

³ Despite this expansive timeframe redevelopment can and must occur incrementally to fulfil the other planning and strategy demands for bulk materials handling generally, integration with nearby release area planning and infrastructure demands.)

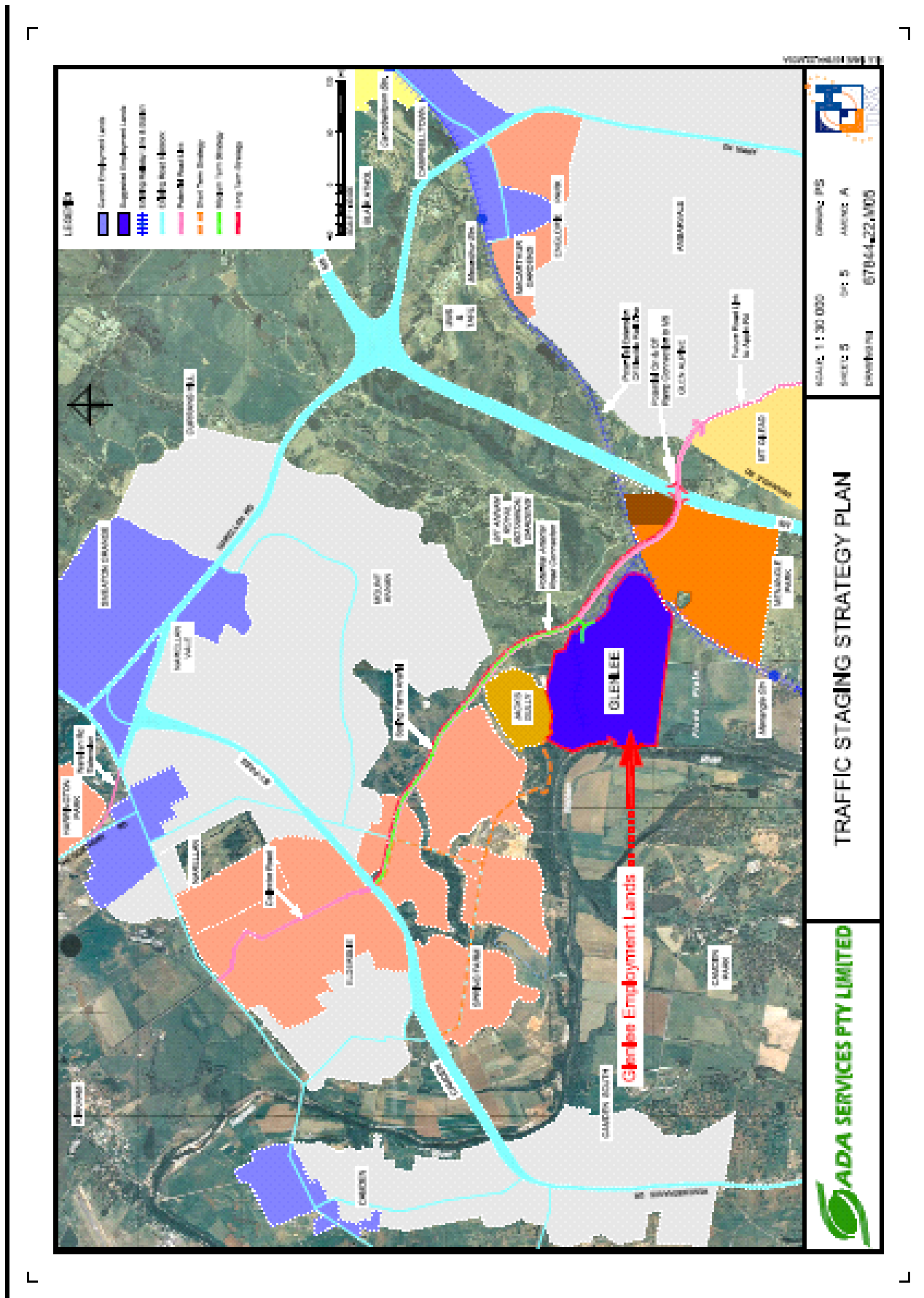


Figure 3 – Traffic Staging Strategy Plan

3.3.2 Rail Access

The Sada Services Pty Ltd site is serviced by a separate spur line leading from the main southern railway line at approximately 60km from Sydney. The spur consists of a triangle junction of a north and south fork (approximately 300m long each) onto a master siding of 337m long. This then splits into two sidings of 1,428m and 1,364m each. With the exception of the south fork, the trackwork consists of timber sleepers with dogspike plates and 47kg rail, the south fork being 60kg rail.

The track from the junction through to the end of the master siding is track circulated using Jeumont Schneider type trackside equipment. The turnouts and catchpoints in the triangle junction are remotely operated and checked, inspected and maintained.

The rail spur was designed and constructed to a Class 2 Standard meaning that the structure is based on timber sleepers with 47kg rail. This allows maximum rail axle loads of 21 tonnes without exemptions. The rail spur has handled in excess of 3 Mtpa of coal transport over many years and is capable of handling similar throughput in the future.

Section E – Future Landuse

4.0 The Development Proposal

4.1 The Vision

The owners/occupiers of the Glenlee Site share a common vision which sees the comprehensive redevelopment of the Glenlee Precinct overtime with a clear heavy industry/transport focus and their ongoing presence in enhanced facilities, with such being compatible with new industrial activities on site.

The vision has as a central focus the receipt, handling and transhipment of bulk materials and value adding activities. The heavy industry focus is, however, not considered to be to the detriment of the broader base of manufacturing and light industrial activities and support facilities and services. A copy of a preliminary concept Structure Plan consistent with the subject vision is reproduced as **Figure 4**.

4.2 Project Objectives

The realisation of the Vision cited above includes pursuit of the following project objectives:

- Incremental/staged redevelopment overtime;
- Seizure of market opportunities when they become available;
- Fostering/cultivating new market opportunities;
- Capitalise on value-adding activities;
- Integrate with regional strategies, e.g. Bulk Materials and Metropolitan Strategy;
- Integration with nearby urban release area planning;
- Integrate with/capitalise on heavy rail and City Rail network planning and development;
- Catalyst for multi-stakeholder commitments to sub-regional transport infrastructure;
- Optimise multi-stakeholder funding of higher order infrastructure, particularly Auslink funding;
- Foster natural systems corridor linkages with off-site corridors;
- Enhanced levels of Precinct sustainability.

4.3 Project Description

Consistent with the ‘Vision’ and ‘project objectives’ detailed above at 4.1 and 4.2, respectively, the redevelopment of the Glenlee Site proposes:

4.3.1 Current Operation/Activities

- The continuation of the TRN Group Truck/Earthmoving Depot;
- The continuation of the Camden Soil Mix activity in rationalised facilities;

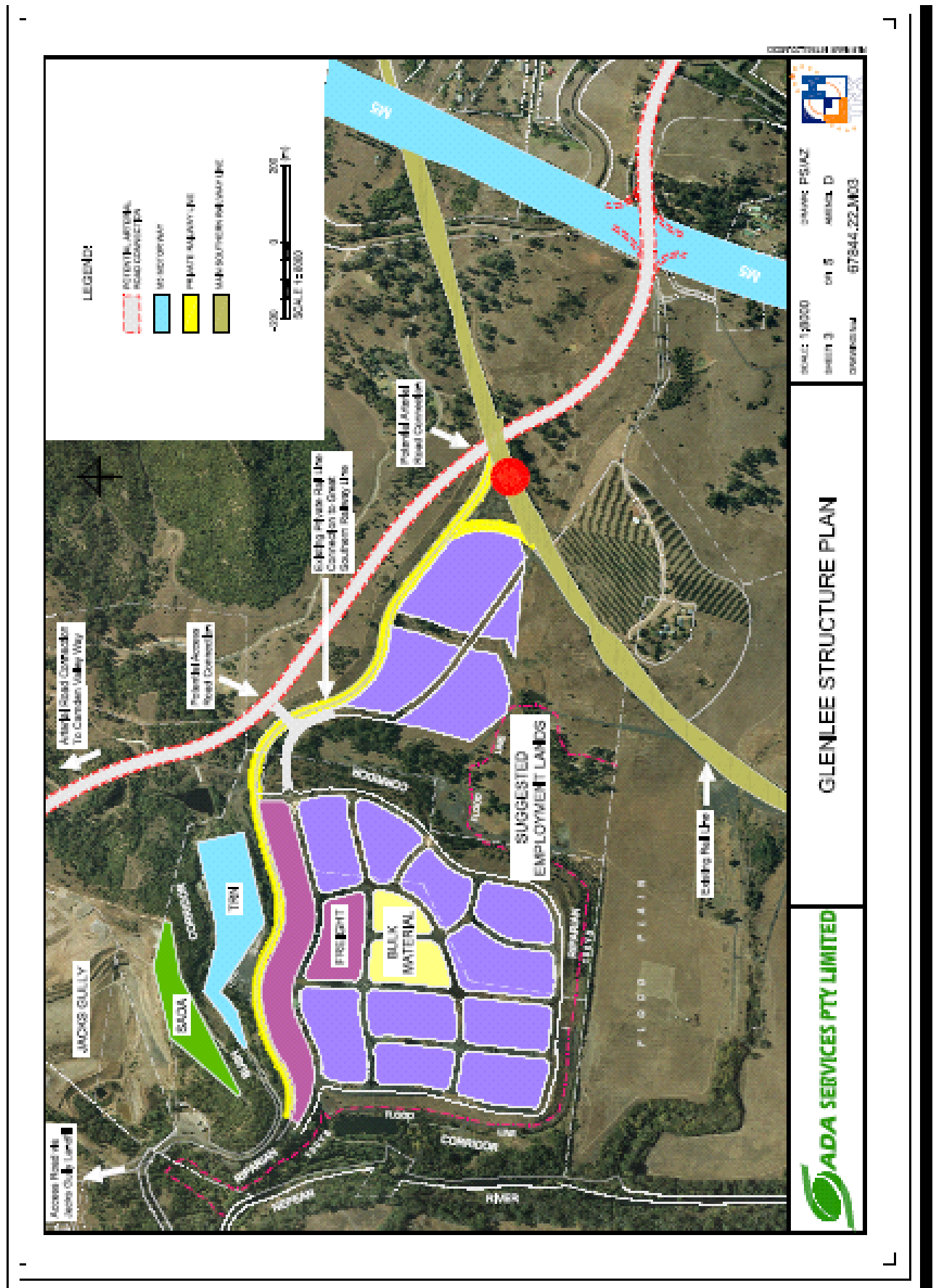


Figure4 - Glenlee Precinct Structure Plan

- The continuation of the receipt of coal reject material and the reworking of on-site reject material generally, including the sale and emplacement of final reject in a rationalised form;
- The continuation of related Sada Services Pty Ltd administrative activities in enhanced facilities and related engineering functions and the Trazblend transport fleet; and
- The continued reprofiling of land for future use for the expansion/consolidation of the Precinct.

4.3.2 Future Operations/Activities

In addition to the consolidation and enhancement of the current activities it is proposed to attract a range of heavy and support industrial activities. These new activities are envisaged to be of a nature which principally capitalise upon the access to the National Rail network, proximity to the arterial road network and metropolitan focussed market opportunities. Targeted activities will include:

Intramodal train operations

- Marshalling and servicing of trains operating on the east coast standard gauge corridor;
- Servicing and provisioning of locomotives;
- Maintenance work on both locomotives and wagons and reconfiguration of trains operating on the corridor

Bulk Materials Handling

- Receipt and handling of bulk materials from regional areas by road and rail;
- Redistribution to markets within the Metropolitan area by road and rail.

Container Handling and Storage

- Potential site for a new terminal in south-west Sydney for unloading and distribution of containers consistent with the Port Botany strategy;
- Intermodal facility for loading and unloading containers from rail services to articulated vehicles and distribution to/or from the southern metropolitan area;
- On-site storage and maintenance of containers;
- On-site warehousing facilities to assist with freight distribution.

Manufacturing Development

- Manufacturing operations focussed upon, but not limited to, treatment of bulk materials;
- Related value adding activities (vertical and horizontal integration).

Distribution Centres

- Distribution of goods received from interstate and intrastate (regional NSW) by road or rail to local and metropolitan markets.

Minerals Processing

- Receipt of minerals generally, processing, temporary storage and distribution.

Concrete Batching

- Establishment of a concrete batching plant for off-site distribution;
- Manufacture of concrete based products.

Warehousing and Logistics

- Warehousing and general transport services.

Reprofiling

- Continued reprofiling of land including limited filling.

Section F – Environment Assessment and Management

5.0 Biophysical Environment

5.1 Flora and Fauna

The Glenlee Site is in large part disturbed as a result of the washery/emplacement/transport related activities on the Site and the land fill operations at Jacks Gully. Further, the more expansive Precinct was cleared for agricultural purposes generally.

The area and surrounding locality would have been covered with vegetation similar to remnant pockets on the river flats rising to Cumberland Plain species in the more elevated areas. Some small isolated remnants of original vegetation are evidenced, comprising eucalypts and shrub species. Areas of the Precinct have also been colonised by a variety of exotic weed species, principally wild olive.

A more significant stand of vegetation corresponds with an expanded Nepean River riparian corridor and consists principally of river eucalyptus species and casuarinas. Exotic weeds again infest this area, particularly where disturbed. Some native species are also considered on-site as a result of rehabilitation plans associated with the washery/emplacement rehabilitation program.

The comprehensive redevelopment of the Site offers significant opportunities for removing some of the weed species. Further, the rehabilitation of the emplacement area offers prospects of revegetation in a manner which is integrated with future design and development of the Precinct. The opportunity of fostering enhanced natural corridor linkages with the Botanic Gardens and Jacks Gully and the Nepean River exist on the extremities of the Precinct generally and should be pursued in concert with the redevelopment proposal.

The on-site vegetation potentially provides habitat for some amphibian and reptile species on a permanent basis. Native birds generally use that area as part of the much wider foraging range. The riparian areas are generally rich in fauna species and provide migratory corridor opportunities.

With the exception of the riparian corridors and “stepping stone” opportunities provided by isolated remnants (for bird species foraging in the region), there is little ecologically significant fauna habitat in the area. The landscaping associated with redevelopment and rehabilitation, appropriately pursued, can only but serve to enrich the habitat qualities and indeed the fostering of embellished corridors as previously described.

5.2 Topography

The Glenlee Precinct is located amidst a generally undulating terrain. The Glenlee washery site is located on the Nepean River floodplain. The area surrounding the site consists of a number of distinct landforms, which are characteristic of the area.

Gently sloping (5-10%) to rolling hills occupy the area to the south-east and the south of the site around Menangle Park whilst the Nepean River and floodplains border the area to the west and south-west.

Mount Annan to the north-east is the most prominent landform feature of the area with an elevation of 180 metres above sea level (ASL). Mount Annan and a line of rounded hills form a divide between the watershed of the Nepean River and the Georges River/Bow Bowing Creeks system, as well as representing the boundary between the local government areas of Camden and Campbelltown.

Land in the immediate vicinity of the washery consists of small hills and river flats with elevations ranging from 167 to 100 metres ASL and slopes of 5 to 30 per cent. This area is drained by a number of small creeks.

The topography of the site is highly varied with elevations ranging from 60 metres ASL adjacent to the Nepean River to 90 metres ASL along the ridge of the batter which borders the works area of the washery/emplacement facility. Surface gradients on the washery site proper vary from gently sloping (5-10%) in the stockpile and rehabilitated areas to steeply sloping (>30%) on the batters of the settling pond and western perimeter.

5.3 Climate

The area experiences a moderate climate. Records at the nearest monitoring station reveal the climate to be generally moderate in nature predominantly influenced by maritime patterns modified by the distance from the coast. Principal features of relevance to the proposed redevelopment are discussed briefly below.

5.3.1 Temperature

Average daily temperature ranges in the locality from 14.9° C to 29.1°C during summer and 2.4°C to 19.1°C during winter respectively.

5.3.2 Rainfall

Rainfall has become particularly variable of recent years, with prolonged dry spells dominating. Notwithstanding this variability, mean annual rainfall for the area averages 600mm to 700mm, which is distinctively lower than the coastal areas of Sydney. Rainfall is generally seasonably distributed with a late summer/early autumn peak. It is lowest in winter (July to September). Mean daily evaporation rates similarly have displayed a tendency to increase of recent times. Mean daily evaporation rates range from 2.0mm to 4.0mm during winter to 4.5mm to 6.8mm during summer.

5.3.3 Wind

Wind directions and strength in the locality are highly variable. Prevailing winds in winter are predominantly from the south and west, whilst in summer they are principally from the north-east. However, on an annual basis the wind pattern shows a dominance of south-westerly winds.

5.4 Hydrology and Water Quality

5.4.1 General

The washery and industrial components of the site are located within the lower catchment of an unnamed creek, which drains the steeply sloping areas of Mount Annan. The creek has a catchment area of approximately 340ha of which about 270ha is situated upstream of the washery site. Drainage is generally in a south westerly direction and the creek discharges into the Nepean River at Bergins Weir.

A comprehensive water quality management system is currently in place in respect of the major industrial activities currently in operation on the Glenlee site. This system is shown diagrammatically in **Figures 5 and 6**.

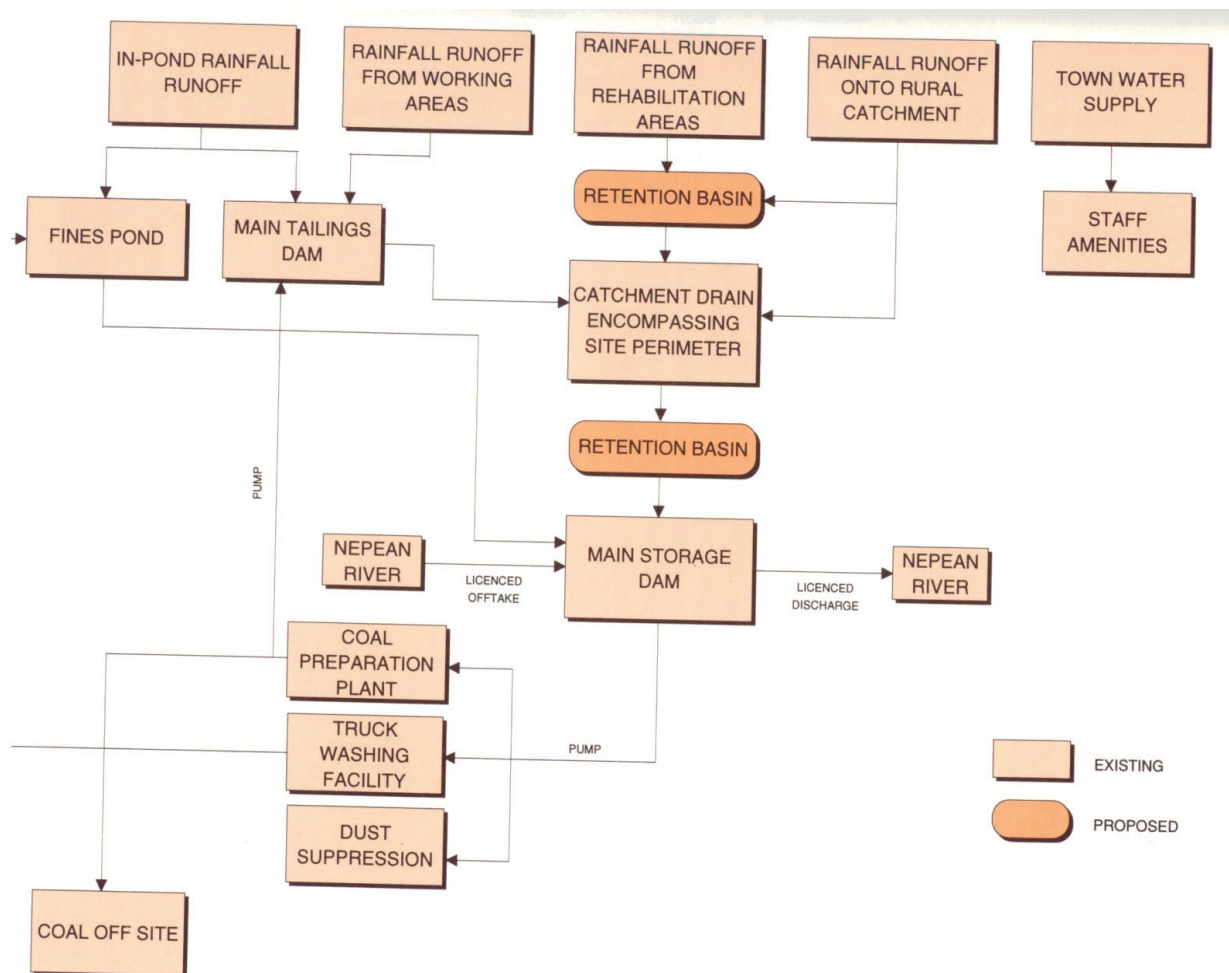


Figure 5 Schematic Layout of Water Management System

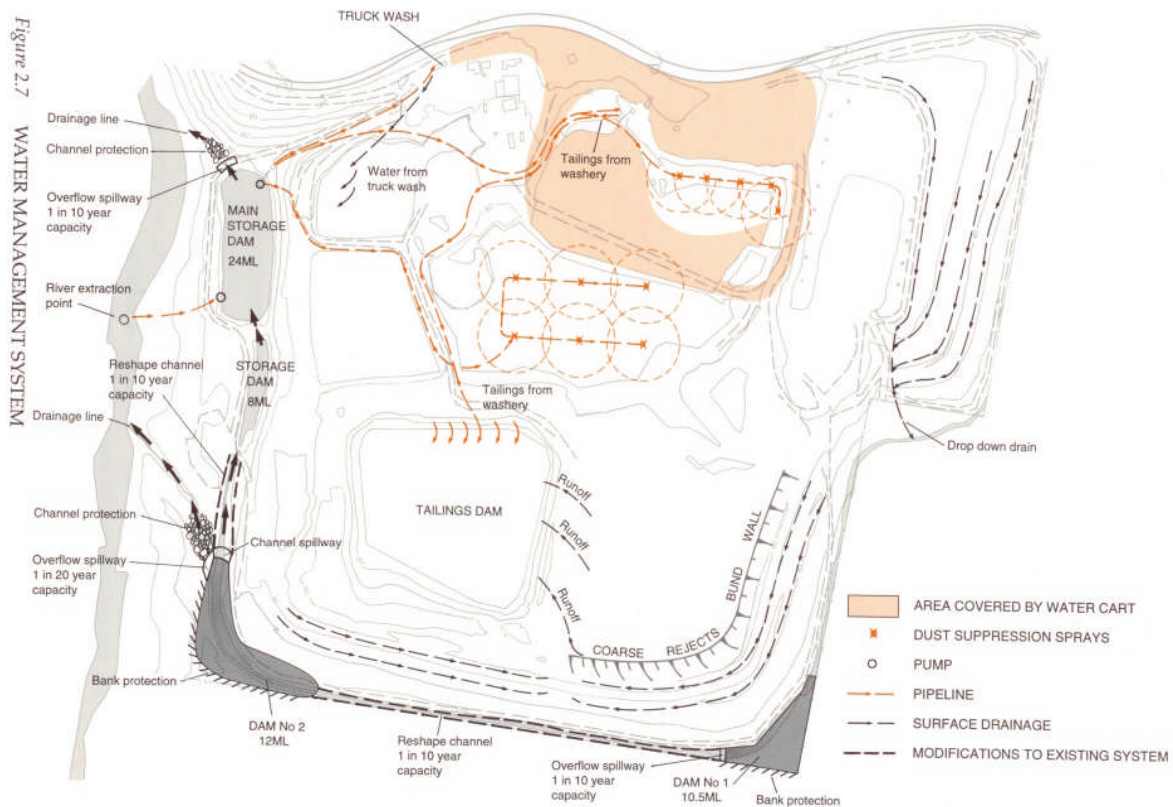


Figure 6 Water Management System

The central approach to water management on site is to capture and treat all water from the washery and disturbed areas before it enters the main storage dams, whereupon it is re-utilised on-site or discharged under license to the Nepean River. This process is described further below.

Existing Coal Washery and Stockpile Areas

Stormwater runoff from the coal washery, processing and stockpile areas are initially collected in the main tailings dam located in the south-west corner of the site. Stormwater and drainage from the fine rejects filters through the dam wall and into the catch drain bordering the southern perimeter of the site. Water from the catch drain flows into the main storage dams.

Clean Water Diversion

Rainfall runoff from the rehabilitated areas of the site and the surrounding rural catchment is collected in a drainage channel located around the site boundary. The drain diverts clean runoff as well as filtered washery water into the storage dams.

Groundwater

Much of the site, in particular the reject emplacement area, is an artificial landform created by placing material onto the original surface. Consequently there are no groundwater flows from the external sources flowing through the emplacement areas.

Any groundwaters or filtered water from the emplacement would be sourced from water applied to the emplacement areas. This water has two main forms; rainfall infiltration and water draining from the tailings dam. The base of the tailings dam is relatively impermeable as it is formed by fine rejects. Any drainage, from this area would drain through the filter wall and be collected for use in the washery water supply. Water infiltrating the surface of the remainder of the site would tend to drain through the relatively permeable emplaced coarse reject material and either flow laterally along the heavily compacted former floodplain surface, or enter the underlying system which is believed to consist of permeable soil and sand deposits.

Internal Roads

Drainage from the internal haul roads is collected and diverted to the tailings dam.

Workshops and Service Areas

Washdown water from the workshops and service areas may contain coal, oils, grease and detergents. This water currently drains to the fines pond in the north western corner of the site and enters the washery make up water system. Oils and grease are removed from the water.

Sewerage

Sewerage from the existing washery amenities is treated in the existing septic tank system.

Processed Water

It should be noted that the Glenlee site has a total of 54.5ml of pollution control storage with spillway capacity for storms up to a 1 in 20 year return interval. Glenlee washery also holds a licence to draw 400ml per annum from the Nepean River. This source is used to supplement water supply in dry weather.

5.4.2 Revised System

The redevelopment of the Site as proposed will require a review and likely modification of the current system to address a different range of development issues.

The current water quality strategy and infrastructure may well remain central elements in a revised system. Any such system is likely to drive total water cycle management and sustainable reuse to a new generation of practice, including a possible reclamation plant to supplement or replace other water sources. This potential direction is not challenged and is indeed warmly embraced by the proponents who wish to champion leading practice management techniques and benefit from the long term savings.

5.5 Air Quality

The Glenlee locality lies within the topographical region of the Sydney Basin and is consequently influenced by the Basin's internal air circulation system.

In such context it tends to be a recipient of not only local and sub-regional emissions, but is also subject to the overwhelming impact of poor air quality within the Sydney Basin. The locality is also typified by odours. Potential odour sources include:

- The Camden Soil Mix operations;
- Jacks Gully Waste Disposal Depot;
- Agricultural and farming activities, including the use of fertilisers.

It is proposed to ameliorate the effects of the odour producing activities of Camden Soil Mix and introduce major technology to the Jacks Gully site in order to reduce significantly odours currently derived from these sources.

5.6 Salinity

5.6.1 General

The Glenlee Precinct is identified on the Salinity Potential in Western Sydney 2002 Map as “moderate to high salinity potential”. The reality, however, is that the highly disturbed areas of the Site have significantly altered the interface with groundwater and the soil profile. Much of the area is extensively capped with reject material, a practice which will continue as reject material is re-worked and as such is not exposed to the impacts of groundwater focussed salinity.

5.6.2 Response

Appropriate building and installation practices will be pursued to minimise any potential risk to buildings and infrastructure occasioned by exposure to saline groundwater impacts. Similar precautions will be adopted in the disturbance of any ‘virgin’ areas. The fostering of enhanced corridor plantings will also have potentially beneficial impacts in any corresponding recharge areas.

5.7 Bushfire Management

5.7.1 Current Fire Management Practices

The majority of the Sada property and associated occupiers, has been cleared of native vegetation. With the current disturbed situation on site, no specific management of the vegetation is required. However, suitable fire fighting provisions have been made with fire extinguishers located at strategic locations around site and pumping systems established using water from both on site dams and the Nepean River available for fire fighting purposes.

5.7.2 Future Fire Management

With the plan to foster bush corridor linkages, it will be essential that appropriate fire management initiatives are implemented. The fire management regime for the remainder of the site will remain unchanged.

With the progressive development of the bush corridor, the following bushfire control strategies are proposed.

5.7.3 Fire Trails

The purpose of a fire trail is to provide a physical break in the vegetation to provide access for fire fighting equipment through the vegetation, as well as escape routes if required.

The location of fire trails is an important factor in determining their effectiveness. Fire trails will be maintained in the following locations:

- Around the perimeter of the Glenlee Industrial Complex;
- In conjunction with the proposed Bush Corridor linking the Nepean River to the Mount Annan Botanic Gardens through the Glenlee Complex;
- Along roads and tracks that traverse the washery; and
- Between adjacent land holdings within the complex.

In order to ensure the effectiveness of these fire trails, they will be maintained in an all weather condition suitable for access by 2WD vehicles. This will ensure that they can be used as an escape route for all vehicles on the site, if necessary, as well as providing safe driving conditions for fire fighting trucks and equipment.

5.7.4 Management/Maintenance

An appropriate maintenance and management regime of the fire trails will be established:

5.7.5 Other Elements

Other elements in the management strategy include the provision and maintenance of appropriate asset protection zones and cleared areas generally and sufficient access to water and fire fighting equipment.

6.0 Human Environment

6.1 Transport/Traffic/Accessibility

The traffic, transport and accessibility implications of the proposal require a comprehensive understanding and pragmatic strategy being derived from a firm understanding of the significant historic and existing heavy vehicle movements and the proposed staged nature of redevelopment.

6.1.1 Existing Conditions

Road Access

Road access to the Glenlee Site is currently provided via a private haul road which intersects with Richardson Road at the corner of Springs Road. Springs Road provides access to the Camden Bypass via the Macarthur Road interchange.

The Camden Bypass provides access south to Menangle and Picton and north to the F5 and Campbelltown via Narellan Road. Richardson Road provides access to Narellan and Narellan Vale and on to Camden Valley Way.

Both Richardson Road and Springs Road function as Local Collector Roads within the local road network and have been designated as heavy vehicle routes. Both roads currently carry a relatively high proportion of heavy vehicle traffic due to the surrounding landuses, including the Glenlee Precinct, Jack's Gully Waste Disposal and Recycling Centre and sand mining in Spring Farm. The main haulage route used by most heavy vehicles associated with the preceding uses is via Springs Road to the Camden Bypass via the Macarthur Road interchange.

Description of Surrounding Road Network

The F5 Freeway is a national highway running north-south near the western edge of the Campbelltown LGA. The F5 Freeway is the major connector to the rest of Sydney and south towards Canberra and the Southern Highlands. At the Narellan Road interchange, the F5 Freeway is a four lane dual carriageway road. Narellan Road is an arterial state road running east – west connecting the F5 Freeway (and Campbelltown) to Camden Valley Way. It provides access to the residential suburbs of Narellan Vale, Currans Hill, and Mount Annan and the industrial area of Smeaton Grange. Narellan Road is predominately a four lane dual carriageway road.

However the RTA has recently upgraded the capacity of Narellan Road with the installation of traffic signals, additional travel lanes and bus priority lanes. Camden Valley Way is an arterial state road north of the Northern Road and a regional arterial road south of the Northern Road. Camden Valley Way connects the Camden Township, Elderslie and Narellan with Narellan Road (Campbelltown) and further north to Liverpool. Except through Narellan, Camden Valley Way is a two lane road west of Narellan Road.

The Camden Bypass is an arterial road running parallel to south of Camden Valley Way. The Camden Bypass is a four lane divided road (2 lanes in each direction) and has interchanges with Narellan Road and Macarthur Road. The Bypass, although under utilised, provides an alternate east west route to Camden Valley Way.

Richardson Road functions as a collector road connecting Spring Farm and Narellan with the Camden Valley Way at a signalised intersection. Richardson Road provides a single traffic lane and an adjacent parking lane in each direction north of the Camden Bypass. Richardson Road is currently used by some vehicles to access the Jack's Gully waste disposal site.

Springs Road is a minor collector road connecting Richardson Road and Macarthur Road the Spring Farm Urban Release Area. Historically it has carried up to 3 Mtpa of coal related traffic into Glenlee. The road is a two lane road (one lane in each direction) with unsealed shoulders. It is proposed that Springs Road will be closed, sand extracted and replaced as part of the Spring Farm Urban Release Area development.

Macarthur Road is a collector road linking Camden Valley Way and the Camden Bypass (then to Springs Road). The road provides a traffic lane and parking lane in each direction.

Rail Access

Rail access to the Glenlee Site is provided by a separate spur line off the main southern railway line. As such the site has an existing rail connection to Port Botany, Port Kembla and Newcastle and to all other States. This spur line has been used in the past to handle in excess of 3 Mtpa of coal transport. It is understood that the spur line and associated siding is maintained and currently capable of handling the historical throughput.

The presence of an existing spur line and associated siding facilities in conjunction with the proposed integrated transport terminal / industrial facility on the Glenlee Site provides an opportunity to;

- significantly reduce the potential implications of road based haulage generated by the proposed integrated transport terminal / industrial facility.
- significantly reduce road haulage on intrastate middle distance routes as bulk materials such as sand and gravel are increasingly sourced from outside the Sydney basin
- potential to reduce truck traffic to/from South West Sydney and on inter and intra state roads to places such as Port Botany and interstate by operation of an intermodal terminal

6.1.2 Future Road Network Infrastructure Improvements

Spring Farm and Elderslie Urban Release Areas

Master planning for the Spring Farm and Elderslie urban release areas identified a number of road network infrastructure improvements that are required to accommodate the traffic generation potential of residential development.

In the planning for road network improvements the traffic analysis undertaken for the release areas included an assessment of the existing traffic generated by the Glenlee Precinct. This was undertaken using traffic surveys of existing traffic flows on roads surrounding the release areas. A key element in the development of the Spring Farm and Elderslie urban release areas is the construction of a new at grade signalised intersection at Camden Bypass.

The new intersection is proposed at the junction of the new Elderslie Collector Road, the Camden Bypass and the new Spring Farm Arterial Road West (Link Road West). The Elderslie Collector Road will run through Elderslie between Camden Valley Way and the Bypass. The Link Road West will run through Spring Farm, across Richardson Road to the northwest corner of the Jacks Gully Waste Disposal Facility.

Within the Spring Farm release area to accommodate Spring Farm residential and existing traffic flows including existing traffic to Glenlee Precinct, the Link Road West will be initially built as a four lane road to Richardson Road and then designed with a road reserve to accommodate 4 traffic lanes but built as a two lane road (one lane each direction) further east.

The proposed new four way signalised intersection of the Camden Bypass and the Link Road has been designed to accommodate full development of the Spring Farm and Elderslie release areas, existing traffic and background growth to 2016. Ultimately the Spring Farm Link Road East will reduce pressure on this intersection.

Narellan Road

To provide additional capacity along Narellan Road and improved operational performance for commuter and public transport services, the RTA has upgraded two Narellan Road intersections at Mount Annan and is currently extending Narellan Road from its existing intersection with Camden Valley Way to intersect with The Northern Road.

Spring Farm Arterial Link Road

As described above, as part of the Spring Farm and Elderslie release area development, the Link Road West will be constructed from the Camden Bypass and extend through the Spring Farm release area to the extent of the Precinct's boundary.

As such no connection of the Link Road is currently planned or funded between Spring Farm and Menangle Road (referred to hereafter as the "Link Road East"). As part of the planning for the Spring Farm and Elderslie release areas, the intersection of the Link Road and the Camden Bypass has been designed to accommodate traffic flows with and without the provision of a link to Menangle Park.

At this stage, it is understood that the RTA has not committed to any works associated with the provision of the Link Road East and it is not on the RTA future road works program. It does remain, however, a central sub-regional link in the medium to long term. As noted above the RTA has committed to and is undertaking upgrade works along Narellan Road and is involved in the planning of the Link Road West to Camden Bypass intersection.

It is understood that a number of stakeholders are currently investigating the potential opportunities associated with the provision of access to the F5 Freeway along the Spring Farm arterial link road alignment. Stakeholders include Landcom (as part of the Menangle Park urban development) and the owners/operators within the Glenlee Site.

6.1.3 Projected Traffic Generation Potential - Precinct

An indication of the projected traffic generation potential of the proposed overall development has had regard to typical industrial traffic generation data produced by the RTA⁴. In particular, the RTA Guidelines provide the following indication of traffic generation potential for industrial development where neither the quantum of the floor area or the workforce is known:

⁴ RTA 'Section 3 – Landuse Traffic Generation' October 2002 (Table 3.4).

“If the number of employees is not known, estimates can be made from the size of the proposed floor area. If the proposed floor area is not known (such as when strategic planning is being undertaken for large industrial estates), an indicative figure of 28 employees per developed hectare could be assumed.

Application of the typical employment density rate specified by the RTA Guidelines to the Site yields a potential workforce of 1988 persons (developable land). If the Precinct was included the potential workforce could be 3248 persons. The Site is therefore potentially a major employment generator for the Macarthur area. Currently the Site employs some 155 persons, with the Site largely underdeveloped.

The projected and existing vehicle usage to/from the Glenlee Site is as follows:

Table 1 - Estimated Daily Traffic Generation

	Vehicles
Site	4572
Precinct	7470

Note: Precinct includes site movement.

Table 2 - Existing Daily Vehicle Movements

	Light Vehicles	Heavy Vehicles
Site	370	285

Note: Precinct includes site movement.

6.1.4 Future Site Access Scenarios

The proponents have recognised a changing scenario for access in the short to medium term of the Link Road West as part of the Spring Farm and Mount Annan developments. Also the existing access road into the Site (ultimately Precinct) is to be subsumed into the Spring Farm development and the developers are to construct a replacement access road from the Link Road West to the Precinct boundary. The proponents have indicated below likely access alternatives during the various timeframes of development in the Spring Farm area.

Short Term

(a) Continue using Private Road and Springs Road –

- I. Preferred option for as long as possible – in control of Camden Council (least amenity impact)

(b) Close Springs Road i.e. Private Road and Richardson Road to Camden Valley Way

- I. Not desirable to proponents or other constituents at all

2. Do not close Springs Road until Link Road West connected to Richardson Road. (significant amenity impacts)

Short to Medium Term

Private Road, Richardson Road then Link Road West to Camden Bypass

1. Link Road West constructed in early stage of Spring Farm release area to a noise attenuating standard for heavy vehicle usage
2. Construction is likely prior to any additional uses at the Glenlee Precinct (some minor amenity impacts on new Richardson Road focussed residential development)

Medium Term

Link Road West to Glenlee Site boundary

1. Link Road West is to be extended from Richardson Road to Glenlee Precinct boundary by Spring Farm/Mount Annan South developers
2. Extension of Link Road West has to be a pre-requisite to closure of existing Glenlee Site private access road.
3. Glenlee Site owners will not be willing to agree to sale and relinquishment of use of access road land to Spring Farm & Mount Annan South developers until Link Road West to Site boundary is in place and operational (good medium term strategy).

Longer term

Link Road West and new Link Road East connecting to F5 and Menangle Road

- 1 Link Road East connecting Glenlee Precinct boundary (or a roundabout north of Jacks Gully) to F5 and Menangle Road is at concept design stage.
- 2 Advantageous to Councils, the Glenlee Site owners and Landcom if built in the Medium to Longer term or sooner.
- 3 In the short term a final corridor needs to be established to allow the Glenlee Precinct and Menangle Park residential planning to be finalised
- 4 In the short to medium term funding models need to be developed between the proponents, Councils, the State Government and Federal Government for this vital regional link. The funding environment is ripe.

6.2 Acoustic Amenity

Current industrial activities emit noises at various levels beyond the boundaries of the site, potentially impacting upon the limited nearby residential premises and amenity of the Mount Annan Botanical Gardens in particular.

Future operations of a redeveloped Precinct are likely to have a similar impact. Further vehicle movements are also likely to have an impact. In this regard some preliminary acoustic investigations have been undertaken by specialist acoustic consultants. The consultants have concluded that from preliminary modelling that, with appropriate controls and planning, noise impacts could be controlled to levels that would integrate with nearby existing and proposed landuses and satisfy amenity goals recommended for 'suburban' residential areas.

During the early stages of the site redevelopment traffic noise on Springs Road in particular is predicted to satisfy the ECRTN collector road noise goals. Other access scenarios will be developed as truck movements and noise levels increase beyond the short-term.

6.3 Residential Amenity

The most proximate areas of concentrated urban development occur at Mount Annan (the final phases of the Mount Annan South development) and proposed Spring Farm to the north/north west of the Precinct.

These residential areas are buffered from the Precinct by the Jacks Gully ridge and setbacks from the Jacks Gully facility. Immediate visual impacts are negated accordingly. Vehicle movements associated with the Precinct are likely to utilise Springs Road, Macarthur Road and the Camden Bypass in the short term. Development in the Springs Road locality is one of the latter proposed residential precincts.

Increased impacts may occur in respect of some of the residences in the Ettlesdale Road precinct but are predicted to be acceptable as detailed previously up until the point that alternative access arrangements are provided. Further, Springs Road is an historic haulage route which has had high trucks movements (up to 3Mtp).

The proposed Menangle Park Release Area will be visually exposed to the Precinct. Rehabilitation of the Precinct and design restrictions on new development in concert with the implementation of a Landscape Masterplan will reduce these impacts. Appropriate acoustic controls will also need to be embraced in any new industrial development.

Glenlee House is the closest residence and is within a direct visual and acoustic shadow. The landscape strategy should seek to minimise the impacts on the viewshed of this residence. Further, the on-site acoustic strategy should seek to minimise the impacts on this residence and workers cottages on Camden Park Estate/Elizabeth Macarthur Institute.

6.4 Employment

6.4.1 Existing Operations

The existing operations include a diverse workforce principally drawn from the local area and involves some 155 persons being employed on the Site. The personnel are involved predominantly with operating plant and equipment associated with the various activities and businesses operated on-site. This core workforce is supported by administration and management personnel located on-site.

6.4.2 Future Activities

The Glenlee Precinct is identified in a variety of regional planning strategies dating back to the Three Cities Structure Plan – Campbelltown Camden and Appin (1973) and more recently the Metropolitan Strategy (2005) as a major employment lands precinct opportunity.

Additionally, recent industrial lands review exercises undertaken by Hill PDA and MACROC have flagged the potential of the Precinct as a major employment lands source. It should be noted that the potential heavy industry, transport and warehousing focus will likely bring significant job generation prospects. Some of the value adding and horizontal and vertical integration opportunities will also enhance this potential employment template.

Having regard to broad RTA guidelines of industrial employment, it is projected that employment levels in the following order could be achieved:

- The Site – 1988 persons.
- The Precinct - 3248

6.5 Archaeology

The Glenlee Site has been highly disturbed and modified from its original condition. The major modification has included the extensive placement of reject material over an extensive area. The likelihood, in such context, of there being any intact Aboriginal archaeological site is most remote.

From predictive modelling principles it may well be that the elevated areas may include areas of interest. The challenging topography of most of this land will leave it generally free of any potential adverse impacts. Should any development be proposed in this area appropriate investigations would be undertaken during the Environmental Study/Draft Local Environmental Plan process.

The surrounding area has undergone extensive clearing and disturbance associated with rural landuse activities. The likelihood of artefacts and areas of interest in such context is probably particularly limited. Appropriate investigations will similarly be undertaken if it is proposed to fill and develop any such land.

The Nepean River and floodplain embracing the Elizabeth Macarthur holding is however, a known area of high Aboriginal archaeological value. It is not proposed to develop near this zone of sensitivity.

6.6 Cultural Heritage and Landscape

6.6.1 Cultural Heritage

The industrial use of the Glenlee site represents an important era in its history and should be further explored in terms of industrial archaeology. Having said that unless there is any particularly unique piece of plant or equipment or social history an annotated visual record should occur as development takes place. The redevelopment of the site also provides an opportunity to interpret its industrial history in particular. This may occur by way of estate and street names and interpretative signage as an example.

Off-site and in the general locality are the significant heritage items and their associated cultural landscapes of Glenlee House and Camden Park Estate. These items are of local and regional significance and on the register of the National Estate as a minimum, with Camden Park Estate also being of State Significance.

6.6.2 Impacts in General

The principal potential impacts in terms of these items and their landscape contexts are acoustic and visual. Acoustic issues have been addressed elsewhere. The potential visual impact of the current activities was raised in the 'Planning Focus Meeting' and by Council/s and is discussed briefly below.

6.6.3 Visual Impact

A comprehensive visual analysis of the external impacts of the current development was undertaken by landscape architects. **Figure 7** below shows key locations attached to the visual analysis.

The Jacks Gully ridge largely prevents views from the Spring Farm and Mount Annan urban release areas to the north. Some limited views of operations occur from the more exposed south facing gardens of Mount Annan Botanic Gardens. The existing operations are visible when viewed from a distance to the south/southeast from Menangle Road and Menangle Park and will be visible from the proposed Menangle Park urban release area. In a similar fashion the Precinct is very exposed visually to Glenlee House to the east.

The redevelopment of the site offers many opportunities to reduce the visual impact of existing development through the rationalisation of the profile of the emplacement area, the removal of some buildings and plant and the extensive opportunities to revegetate, particularly on the perimeter and through the implementation of a landscape Masterplan. New development will likely involve some large footprint buildings and structures. Accordingly, it is essential that an appropriate colour palette be established and adhered to in respect of new buildings and structures. Framework and screen planting will also be critical in minimising the impact of the expanded industrial footprint.

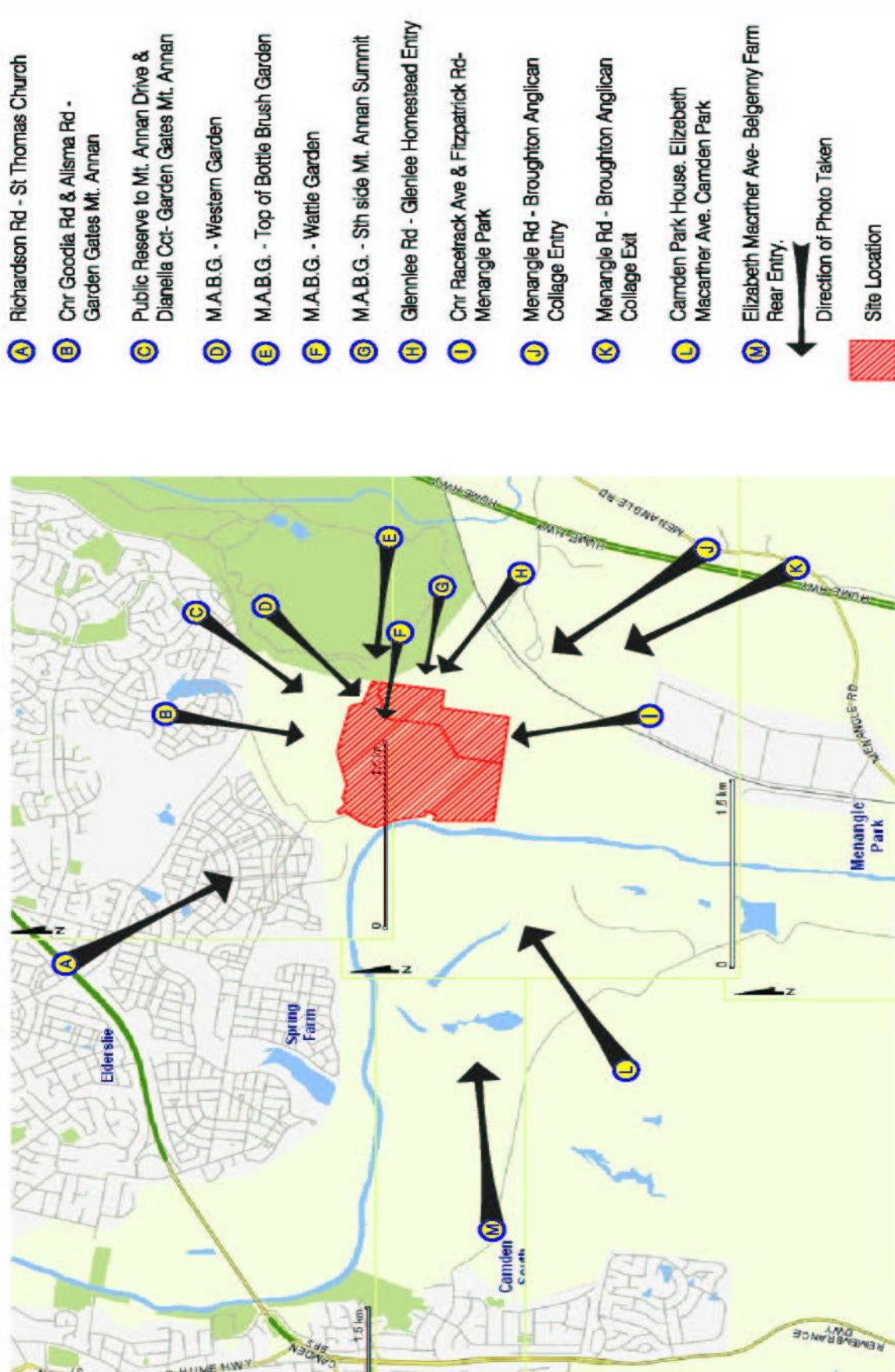


Figure 7 - Location of Visual Analysis

Section G – Prevailing Planning Provisions

7.0 Commonwealth, State and Regional Context

A large number of Acts, policies and planning instruments apply to the Precinct. Below is a summary of the main relevant controls.

7.1 Commonwealth Legislation

The Commonwealth Environmental Protection and Biodiversity Conservation (EPBC) Act 1999 became operational in July 2000. The EPBC Act provides a mechanism for assessing the environmental impact of activities and requiring approval of the Commonwealth Minister for the Environment where an action is likely to have a significant effect on a matter of National Significance (NES matter).

The Act identifies six NES matters:

- World Heritage Properties;
- Ramsar wetlands of International importance;
- Nationally listed threatened species and ecological communities;
- Commonwealth marine areas;
- National Heritage; and
- Nuclear actions.

Under the EPBC Act, it is an offence to carry out an activity (or ‘action’) that will cause ‘a significant impact’ on any matters of NES. Proposed activities that might cause ‘a significant impact’ on a matter of NES should be referred to Environment Australia for consideration. If Environment Australia considers that such an impact could arise, it may determine the development to be a ‘controlled action’, which requires approval from the Commonwealth Minister.

7.2 State Planning Legislation

Various State Government Acts are relevant to the subject Precinct. The requirements of each of these Acts are summarised below.

7.2.1 SEPP 11 – Traffic Generating Development

Provides rationalized requirements in respect of traffic generating developments. There are a range of threshold criteria, which require referral to different levels of traffic committee. The envisaged scale of the proposed development is such that it would probably be referred to the Regional Traffic Committee administered by the RTA. A preliminary traffic and transport assessment has been undertaken by Masson Wilson Twiney and is addressed in section 6.1 of this report.

7.2.2 SEPP 19 – Bushland in Urban Areas

SEPP 19 aims to protect and preserve bushland within urban areas having regard to its value to the community as natural heritage, its aesthetic value and its importance as a recreational, educational and scientific resource. Bushland is defined as:

“Land on which there is vegetation which is either a remainder of natural vegetation of the land or, if altered, is still representative of the structure and floristics of the natural vegetation”.

In terms of development, the Policy requires that bushland zoned or reserved for public open space shall not be disturbed without development consent (except in particular circumstances). It also identifies matters which Council must take into account in determining whether to grant development consent for the disturbance of bushland.

There is an opportunity to link the Mount Annan Botanical Gardens to the bush corridor that has been identified in the Spring Farm urban release area.

7.2.3 SEPP 33 – Hazardous and Offensive Development

Introduces new standard definitions and facilities merit based assessment. The Policy also requires specific matters to be considered for proposals that are ‘potentially hazardous’ or ‘potentially offensive’.

The proposed land use table does not rule out the prospect of an activity of this nature existing with appropriate safeguards in the redeveloped precinct. The provisions of the SEPP would apply if such were the case.

7.2.3 SEPP 44 – Koala Habitat Protection

Encourages the conservation and management of areas of natural vegetation throughout the State that provide habitat for koalas. Its intent is to ensure a permanent free-living population of koalas over their present range and reverse the current trend of koala population decline. The Policy applies to the LGA of Campbelltown and requires that land be investigated to determine whether it includes ‘potential koala habitat’ and/or ‘core koala habitat’.

SEPP 44 requires councils to undertake studies to identify land that is potential and core koala habitat and provide appropriate protection to this land through zoning and Development Control Plan provisions. It also requires that where land that incorporates potential or core koala habitat is proposed to be rezoned, the Director will consider directing that a local environmental study be prepared for the land.

There is no known koala population existing in the Precinct. Any vegetation of habitat qualities would align with the riparian zones and topographically challenging relief, which are not proposed for development.

7.2.4 SEPP 45 – Permissibility of Mining

Ensures there are clear planning controls to determine the permissibility of mining. This Policy allows mining on land, with consent, where an environmental planning instrument requires the consent authority to make a value judgement as to whether such a development is permissible.

The washery approval of 1999 was issued under the pretext that mining was permissible.

7.2.5 SEPP 55 – Remediation of Land

SEPP 55 aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Clause 6 requires that a planning authority must not include land in an EPI which allows the change of use of land unless:

- a) the planning authority has considered whether the land is contaminated; and
- b) if the land is contaminated, the planning authority is satisfied that the land is suitable in its contaminated state (or will be suitable after remediation) for all the purposes for which land in the zoned area concerned is permitted to be used; and
- c) if the land requires remediation to be made suitable for any purpose permitted in that zone, the planning authority is satisfied that the land will be remediated before it is used for that purpose.

Clause 6 further requires that prior to including land in any particular zone the Council is to have regard to a preliminary investigation report. Remediation standards are detailed. Compliance with the Policy will be pursued as a matter of course in any redevelopment scenario.

It should be noted that extensive testing of the Site over recent years has not identified any level of contamination.

7.2.6 Freight Strategy

In December 2004 the NSW Government announced details of the Port Freight Plan, including establishment of the Freight Infrastructure Advisory Board (FIAB) to advise the Government on the implementation of that Plan.

The Plan identifies Western Sydney as a logical freight distribution hub with industry being joined by the strategic transport links of the M7, M4 and M5. A key objective of the Freight Plan is to increase the proportion of freight using the rail network. Generally, the Government's planning is based on three elements, an intermodal terminal network plan for metropolitan Sydney, a plan to improve both the road and rail transport networks, and supporting policy, regulatory and legislative changes necessary to enable the plan to work.

The Glenlee Precinct offers the capacity to be a vital element in the implementation of the Plan, but has not been widely mentioned in such context in the FIAB reports to date.

7.2.7 Construction Materials Strategy

In addition to the Freight Strategy, the Department is currently formulating the Sydney Construction Materials Strategy to accommodate for the future supply of construction materials to the Sydney market. A key element of the strategy will be to encourage the selection of appropriate means of transport and distribution for construction and other materials both to and within the metropolitan area. The Department of Planning has advised that Glenlee will potentially perform an important function in such Strategy.

7.3 Regional Environmental Plans and Strategies

7.3.1 The Metropolitan Strategy 2005

The Metropolitan Strategy documents a vision for Greater Sydney over the next 25 years and details a series of strategies and actions to achieve such vision. Its realization is vitally dependent upon the collaboration of State and Local Government, stakeholders and the community.

More detailed planning will constitute the key to implementing the Strategy and will occur principally through regional and sub-regional strategies. Sub-regional planning initiatives involving the State Government and Council's of South Western Sydney are currently 'ramping up'.

Central to the Metropolitan Strategy and sub-regional Strategies is the subject of target area of 'Economy and Employment'.

The Metropolitan Strategy seeks to Strategically locate employment, ensure good management of existing land resources, ensure there is sufficient supply of suitable commercial sites and employment lands and efficiently utilising existing infrastructure.

The Glenlee Precinct is identified on the Metropolitan Strategy Map (which accompanies the Strategy) as potential Employment Land. It is also understood that the sub-regional planning work currently occurring in respect of the South Western Sydney and recent industrial lands investigations by MACROC are reinforcing the previous Hill PDA identification of Glenlee as an appropriate industrial lands precinct.

7.3.2 Sydney Regional Environmental Plan No 9 – Extractive Industries

The REP requires that on certain land extractive industry is permissible with consent. However, it requires that certain matters be considered in determining whether to grant consent particularly relating to the potential effects on flood behaviour, water quality etc, a rehabilitation plan, noise and vibration levels and proposed measures to address erosion and sediment control. Further the REP requires consultation with the Department of Mineral Resources in certain circumstances.

The plan ensures that decisions on future urban expansion take into account the ability to realize the full potential of important deposits.

7.3.3 Sydney Regional Environmental Plan No 2 - Hawkesbury Nepean River

SPER 20 Amendment No 2 aims 'to protect the environment of the Hawkesbury Nepean River system by ensuring that the impacts of future land uses are considered in a regional context'. The Plan contains a series of policies and subsequent strategies to achieve this aim. Policies relate to the following matters:

- Total catchment management,
- Environmentally sensitive areas,
- Water quality,
- Water quantity,
- Cultural heritage,
- Flora and fauna,
- Riverine scenic quality,
- Agriculture/aquaculture and fishing,
- Rural residential development,
- Urban development,
- Recreation and tourism, and
- Metropolitan strategy.

The REP is supported by an Action Plan, which includes actions necessary to improve existing conditions. There are a series of provisions which the proposed redevelopment would need to comply with. Appropriate strategies will be devised in this regard.

7.3.4 Future Coal Mining and Gas Extraction

Any redevelopment of the site will need to consider potential coal resources in the immediate area. Exploration, gas drainage and mine subsidence could be issues. In this respect the Department of Planning's recently completed Southern Coalfields Strategic Land Use Study should be considered. AGL has developed a number of gas extraction wells within the site and surrounding area, and these are connected by pipelines to a processing plant. It is understood that AGL has plans for further wells in the region and that dialogue should happen with AGL to ensure integrated planning occurs.

7.4 Local Planning Controls

7.4.1 Local Government Boundary

The Glenlee Precinct is bisected by the Camden/Campbelltown Local Government boundary. As such, it is subject to the provisions of local planning controls administered by both Councils. The principal planning controls are embodied in Camden Local Environmental Plan No 48 (as amended) and Campbelltown Interim Development Order No 15 (as amended) respectively. The majority of the Precinct is within Campbelltown LGA.

7.4.2 Camden Local Environmental Plan No 48

The zoning of the land fosters rural and support development and maintaining rural landscape quality. The subject plan zones the land Rural 1 (a) with a 40ha minimum area requirement in respect of subdivision. The aims and objectives of the rural zone are not consistent with current on-site activities or proposed activities. Further, the accompanying land use table precludes industrial activities.

Indeed industries (other than extractive industries, home business and rural industries) are prohibited; as are bulk stores, commercial premises, shops and warehouses.

Current operations enjoy “existing use rights”. However, such planning tool (particularly in its recently revised form) has pronounced limitations in seeking to facilitate the comprehensive redevelopment of the Glenlee Precinct as proposed.

7.4.3 Campbelltown Interim Development Order No 15

This environmental planning instrument, despite numerous amendments, has not been the subject of a comprehensive review since the enactment of the Environmental Planning and Assessment Act. It is an instrument covering the bulk of Campbelltown’s rural areas.

The subject land is zoned Non Urban with a 40ha minimum area of subdivision under the provisions of Campbelltown Interim Development Order No.15.

In a similar fashion to the Camden Planning Instrument, IDO 15 is not geared to facilitate industrial development. Indeed industry (apart from rural industries, extractive industries) is expressly precluded. Bulk stores, commercial premises, shops, transport terminals and warehouses; amongst other land uses are also prohibited under the prevailing zoning.

7.4.4 Principal Controls in Summary

The current use of the Sada land would be largely (although by no means exclusively) defined as an industry under both IDO 15 and LEP 48. Both planning instruments prohibit development for the purposes of industry.

Most of the current development activities are however, deemed to operate pursuant to the “existing use rights” provisions of the prevailing legislation as amended recently. The current uses of the site are all deemed to be lawfully operating with development consent.

7.4.5 Other Local Planning Controls – Camden

7.4.5.1 Camden Consolidated Development Control Plan 2006

The subject plan represents a recent consolidation of all of Council’s planning controls and policy positions/directions, which are not embraced in the principal planning instruments (i.e. LEP’s).

It includes generic development controls for standard forms of development including; inter alia, car parking; cut and fill operations; child care centres; outdoor advertising; residential development and industrial development.

7.4.5.2 Campbelltown Development Control Plans

Industrial Development Policy

The objectives of this Policy are:

1. To encourage an acceptable standard of design in the layout and physical environment of the industrial areas and buildings to be developed.
2. To provide guidelines to encourage a high landscaped quality in industrial areas.
3. To provide the development of industrial zoned land having regard to its location adjacent to urban development, and
4. To encourage development providing industrial employment opportunities.

Development Control Plan 52 – Off-Street Car Parking

This plan aims:

1. To ensure the provision of off-street car parking facilities to satisfy the parking requirements generated by development; and
2. To provide guidelines for the design and layout of car parking areas.

The above documents will be taken into consideration during the redevelopment of the Precinct.

7.4.5.3 Overview of Other Controls

The aims and objectives of the subject plans and controls have underpinned the development of the Concept Plan and will be further observed in the preparation of more detailed specific development applications.

Section H – Approval Process

8.1 General

The redevelopment proposal has generated the investigation of numerous avenues of potentially obtaining development consent. These investigations have proven inconclusive and are still being pursued. A summary of the process options explored is provided below.

It should be noted, however, that notwithstanding the investigation of these alternative approval options the proponents have authorised the submission of this rezoning proposal.

8.2 Amendment of Existing Consent

There are few consents in respect of the existing operation, with many, including the principal washery activity, having been established prior to the current planning controls, which prohibit industrial development in both Camden and Campbelltown Local Government Areas.

Consent for a new washery facility was however, issued by Campbelltown City Council in 1995; whilst an amending draft Local Environmental Plan to permit the rationalisation of the Camden Soil Mix activities is currently awaiting gazettal.

Opportunities exist to pursue amendments to existing approvals. However, these avenues are not currently being promoted.

8.3 A Staged Redevelopment Scenario

Redevelopment of the Glenlee Precinct is promoted as a staged operation given the scale of the proposed activities (time and capital), the market dependent nature of same (in terms of developing the final landform i.e. influences by sale of processed reject material, the securing of rail based receival markets in Greater Metropolitan Sydney and demand for local employment lands) and the multi-stakeholder involvement particularly in an infrastructure sense.

Given the variable timeframes of different components of the redevelopment process it is critical that both immediate and short to medium term planning occur concurrently. To this end it is proposed to:

- Pursue the rezoning of the subject Site/Precinct to an appropriate industrial zoning with both Councils.
- Pursue the approval of a kaolin and sand recovery processing facility and multipurpose unloading facility and ancillary rationalisation of buildings and infrastructure under prevailing planning regulations.

Section I – Rezoning Process

9.1 Rezoning Process

As the option of modifying the existing consent is further pursued and pursuant to the most recent meetings with both Camden and Campbelltown Councils and the Department of Planning, this rezoning proposal has been compiled.

9.2 Spot Rezonings

9.2.1 General

Council can resolve to rezone the land or be directed to do so by the Minister for Planning. The rezoning can occur in the absence of finalisation of the preparation of a principal LEP by both Councils (pursuant to the Standard Instrument Local Environmental Plan Order 2006).

9.2.2 Spot Rezoning Criteria

The Department of Planning's advice in April 2005 relating to 'spot rezonings' is acknowledged and strict application of this policy would mean that the subject land would remain underutilised for the period required to review Council principal LEP (between 3 and 5 years). In this regard we note the Department of Planning's Circular PS 06-015 issued to all Councils on 15 June 2006 which outlines the Department's current position in respect of 'spot rezoning' requests. In particular it outlines a series of criteria to be complied with. With respect to these criteria we provide the following in **Table 2**:

Table 3 – LEP (Spot Rezoning) Evaluation Criteria

Question	Response
Will the LEP be compatible with agreed State & Regional strategic direction for development in the area?	<p>A Draft LEP applying to the subject land rezoning it to Zone No 4 (a) would not be inconsistent with State or Regional Strategies. The land is located within 800m of a future transit node and industrial use of the land (and associated employment). Further, it potentially provides public transport access to several urban release areas and would be consistent with the principle of maximising public transport usage.</p> <p>The land has been used for industrial purposes for the past 50 years and the land has been identified in a number of State planning documents, including the Metropolitan Strategy 2005 and preliminary sub-regional strategy work as a potential employment node.</p>

<p>Will the LEP implement studies and strategic work consistent with state and regional policies and Ministerial (section 117) Directions?</p>	<p>See Annexure 2. Consistent with State Regional Policies & s117 Directions. A draft LEP as proposed would not be inconsistent with Section 117 Directions. Further, it would be consistent with Metropolitan and sub-regional planning.</p>
<p>Is the LEP located in a global/regional City, strategic centre or corridor nominated within the Metropolitan Strategy or other regional/subregional strategy?</p>	<p>The subject land has been identified in the Metropolitan Strategy as a potential employment node. Further, the land is known to be a major consideration as sub-regional planning strategies are prepared and has been regularly identified by MACROC as a potential employment node. The rezoning of the land for industrial purposes is consistent with these Strategic directions.</p>
<p>Will the LEP facilitate a permanent employment generating activity or result in a loss of employment lands?</p>	<p>The draft LEP will increase the amount of land for employment generating industries, which to some extent are precluded from the current zoning of the land. Rezoning of the land potentially enables a further 50ha of undeveloped land for employment purposes.</p> <p>It is also noted that the South-west Sydney Employment Lands Strategy prepared by Hill PDA Consulting in November 2003 highlighted the shortage of employment lands in the Campbelltown and Camden LGA areas. This report specifically noted that the Glenlee site was ideally suited for future employment land purposes. The development of the land would represent a significant increase in the supply of employment lands for the region.</p>
<p>Will the LEP be compatible /complementary with surrounding land uses?</p>	<p>Current land uses surrounding the Site are principally of an industrial or passive nature. The Jacks Gully Waste Disposal Facility is industrial in nature and the land uses to the east are also similarly industrial in nature. There may be potential impacts with the Mount Annan Botanical Gardens. These need to be managed in the design and fostering of new release area will be critical bio-links.</p>

	<p>The Site is also sufficiently removed from most future urban release areas to minimise potential impacts and will principally utilise arterial designed roads and the existing heavy rail network.</p> <p>Design of the interface with the proposed Menangle Park release area will be critical.</p>
Is the LEP likely to create a precedent or create or change the expectations of the landowner or other landowners?	The draft LEP would not create a precedent given that the land has been largely used for industrial purposes for the past 50 years and that it has been acknowledged in planning documents for many decades including the Metropolitan Strategy as an employment node. Further, few other sites have access to the higher order infrastructure servicing the Precinct.
Will the LEP deal with a deferred matter in an existing LEP?	The draft LEP would potentially integrate with the outstanding Camden Soil Mix DLEP.
Have the cumulative effects of other spot rezoning proposals in the locality been considered? What was the outcome of these considerations?	The proposal is not considered to create a precedent and as such is unlikely to have any cumulative impacts. No other sites have access to the same higher order transport infrastructure, are identified locally in the Metropolitan Strategy and have the current bulk materials/transshipment demands. As such the 'spot rezoning' is unlikely to have a cumulative impact.

9.2.3 Section 117 Directions

Further, an assessment pursuant to prevailing Section 117 Directions, issued by the Minister are contained in **Annexure 2** of this report. In brief, the proposal is not inconsistent with any Directions to the extent it would jeopardise progress of a relevant DLEP.

9.3 Timing of Local Environmental Plan (LEP) Amendment

There are doubts in respect of the extent to which both Councils are likely to review their principal instruments as they are compiled and potentially introduce new planning provisions, including the rezoning of land. Further, the preparation of a consolidating instrument is likely to be a particularly protracted process.

The need to commence on-site rationalisation activities and potentially be a stakeholder as capital investment decisions and final bulk materials and freight strategies are finalised and implemented does not facilitate a protracted plan preparation process.

In such context, and in the absence of the Minister rezoning the land pursuant to the Part 3A process, it is recommended that a 'spot rezoning' take place and that this report/application be the catalyst for same.

9.4 Application of the Standard Instrument (Local Environmental Plan) Order 2006

The Standard Instrument was gazetted on 31 March 2006. The Order prescribes a standard form and content of a principal Local Environmental Plan (LEP). The provisions contained in the standard instrument will only have legal force when adopted as part of Council's principal LEP. This is likely to occur incrementally and take Councils some time.

The standard instrument provides a 'template' using standard:

- Zones (including standard zone objectives and mandated permitted and prohibited uses);
- Definitions;
- Clauses; and
- Format.

Council's can:

- Prepare additional local provisions that address local planning issues and which reflect the outcomes of local and regional strategies;
- Add local objectives to the core zone objectives;
- Add additional permitted or prohibited land uses for each zone in the land use table;
- Decide whether or not to include optional provisions in their LEP;
- Specify what will be permitted as exempt and complying development;
- Insert local criteria or standards into certain mandatory clauses;
- Prepare maps that specify the lot sizes, building heights and floor space ratios appropriate for their local area;
- Define terms within a local provision in certain circumstances; suggest new definitions to the Department of Planning that could be suitable for inclusion in the standard dictionary for all Councils to use.

Councils cannot:

- Add new zones or create sub-zones;
- Prohibit uses that are mandated as permissible in a zone;
- Permit uses that are mandated as prohibited in a zone;
- Add local provisions that are inconsistent with the mandatory provisions;
- Change the standard dictionary by altering or adding to the standard definitions;
- Change the format; and

- Change the wording of the provisions.

9.5 Suggested Amendment – A Relevant Zoning

A relevant amendment designed to address the redevelopment vision for Glenlee in a local statutory planning context is detailed below:

Zone IN3 Heavy Industrial (as amended for local circumstances)

1 Objectives of zone

- To provide suitable areas for those industries that need to be separated from other land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of heavy industry on other land.
- To provide a wide range of industrial and warehouse landuses.
- To facilitate mixed use development opportunities, which optimise synergies and do not prejudice local and sub-regional planning strategies.
- To facilitate provision of adequate support infrastructure.

2 Permitted without consent

Nil

3 Permitted with consent

All uses not detailed in 1 or 4.

4 Prohibited

Agriculture; canal estate development; caravan park; cellar door premises; cemetery; educational establishment; dual occupancy; funeral chapel; funeral home; function centre; group home; home based child care; hospital; hotel accommodation; intensive livestock agriculture; medical centre; permanent group home; place of public worship; pond based aquaculture; registered club; residential care facility; residential flat building; restricted dairy; roadside stall; rural workers dwelling; school; seniors housing; serviced apartment; tourist and visitor accommodation; transitional group home; veterinary hospital.

9.6 Nature and Extent of Background Environmental Investigations

Significant and varied environmental investigations have underpinned this rezoning proposal. Their nature and extent is such that the subject rezoning can be confidently and impartially promoted. A decision to prepare an amending draft LEP is however, likely to trigger a requirement for the preparation of a Local Environmental Study. It is considered that any such Study could be clearly founded upon the material contained in this report and the background investigations need only be pursued as an enhancement of same.

Section J – Conclusion

The Glenlee Site has largely been used for industrial purposes for a period of many decades. These activities have focussed principally upon coal washery, reject emplacement and transport activities. A soil mix operation and several general truck depots have been introduced of more recent times. All uses are supported by administration activities.

The Site is serviced by significant infrastructure including a heavy rail siding, which connects (in both northerly and southerly directions) with the Main Southern Railway. Further, it is connected to an existing and proposed enhanced arterial road network and is proximate to and capable of connection with the Hume Highway and Menangle Road.

A time has been reached whereby current activities on-site need to be rationalised as the emphasis of activities shifts. Further, the demand for bulk material handling and transshipment solutions and intermodal demands for Greater Metropolitan Sydney require immediate investment decisions and the securing of longer term strategic opportunities. The Glenlee Precinct is eminently placed to satisfy some of these requirements.

The Precinct has long been identified as a future employment/industrial precinct and is most recently reinforced as potentially fulfilling such role in the context of the Metropolitan Strategy (2005). The current Sub-regional Planning Initiatives are likely to reinforce the Precinct as a priority employment lands opportunity.

The immediate capital investment decisions of the bulk materials transshipment and intermodal industries and the inherent potential of the Glenlee Site require timely planning actions. Indeed appropriate actions to rezone the Site should be made immediately.

Preliminary environmental investigations have identified potential environmental impacts associated with redevelopment to be within a manageable order of magnitude. Further, elements of a framework for environmental management have been advanced.

To advance the staged redevelopment of the Glenlee Precinct, Council is requested to prepare a relevant draft Local Environmental Plan for industrial and related purposes, in conjunction with its 'neighbouring Council' pursuant to the Environmental Planning and Assessment Act 1979 (as amended) and having regard to the 'spot rezoning' guidelines.

