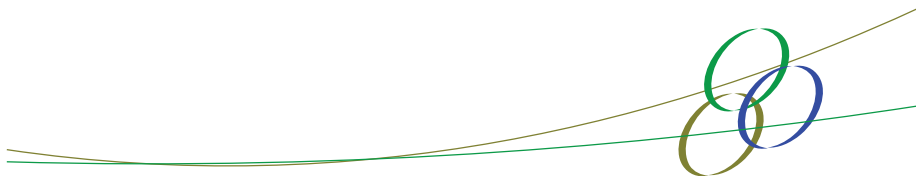


GLENFIELD WASTE SITE REZONING SUBMISSION REPORT

Prepared for Campbelltown City Council

Prepared by Environmental Property Services



Quality Assurance & Version Control Table				
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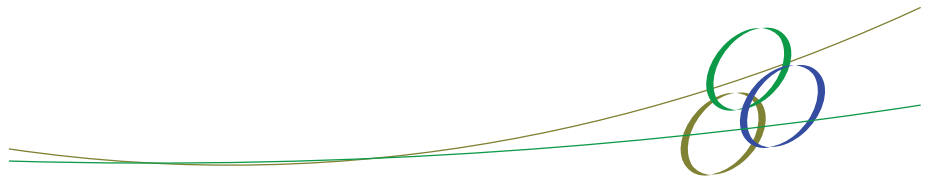
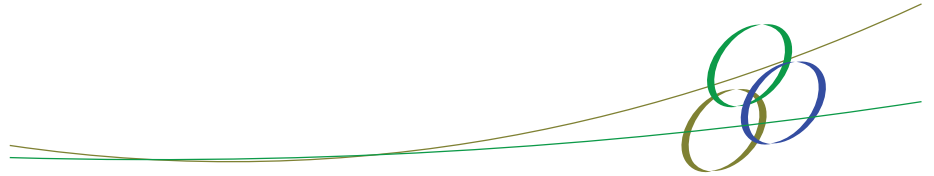


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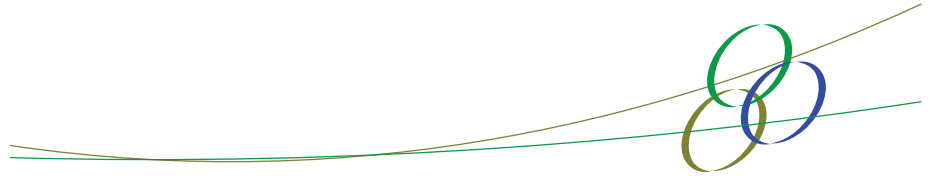
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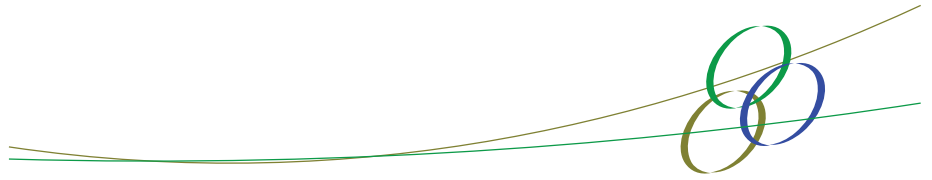
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1 EXECUTIVE SUMMARY

The majority of the southern parcel of Glenfield Waste Services land located in the Campbelltown City Council's Local Government Area is Zone 1(a) – Rural A Zone in the Campbelltown (Urban area) Local Environmental Plan 2002.

The site's rural zone reflects the historical rural land uses in the area. The local area is now an established urban area comprising residential, industrial, commercial, education, open space and major public infrastructure land uses.

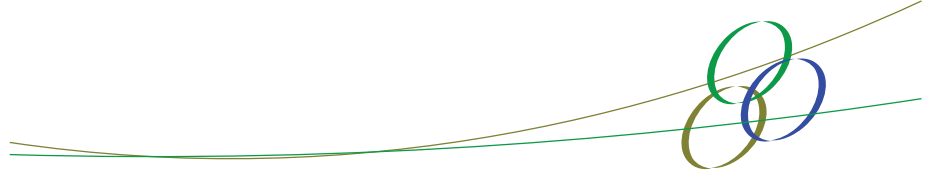
This rezoning submission considers what the site's future function and role should be for the local and regional area.

STRATEGIC POLICY

Key State and Local Government strategic work indicate:

- The site is part of the Moorebank to Prestons and Minto significant freight industry cluster and could provide employment land for the South West Subregion;
- The site is located within 1.0km of the Glenfield rail station, the gateway to the South West Growth Centre and a key transfer node between services on the East Hills, South and Cumberland Rail Lines;
- The South West Growth Centre, that will accommodate 110,000 new dwellings for 300,000 people over the next 25-30 years is proximate to the site;
- The site is on the Liverpool –Campbelltown strategic bus corridor;
- This South West subregion has the highest proportion of private vehicle trips and the lowest proportion of walking and cycling trips in the Metropolitan area;
- More than half of the South West Subregion and Campbelltown Local Government Area (LGA) resident labour force leave the area for work; and
- Future jobs in both the South West Subregion and Campbelltown LGA will fail to match the NSW Government's allocated population growth resulting in a significant increase in the current local job deficit.

The State and Local Government strategic work indicate the site could provide employment lands that would contribute to alleviating some of the future employment challenges faced by the South West sub region and Campbelltown LGA.



Rezoning the site for employment lands would:

- Unlock the site's potential to provide jobs within close proximity to a key Metropolitan transport corridor that will deliver cross regional links between regional cities and major centres;
- Contribute to increasing the South West Subregion's and Campbelltown LGA's employment self-sufficiency; and
- Support the NSW Government's objective of integrating land use and transport planning to ensure that opportunities to benefit from infrastructure investment are realised.

The State and Local Government strategic work finds the site's future function and role as providing employment lands that will contribute to the future sustainable growth of the South West Subregion and the Campbelltown LGA.

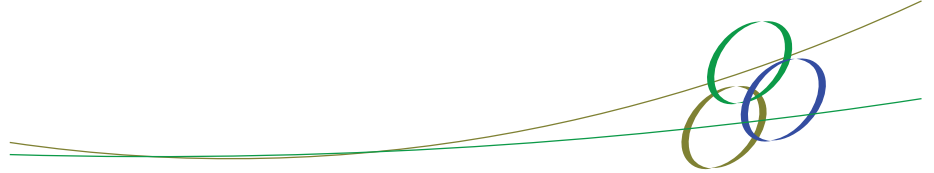
SITE INVESTIGATIONS

Even though the southern parcel of land is approximately 60 hectares the site's developable area is approximately 28 hectares. The following parts of the site will most likely not be suitable for traditional industrial development:

- The 12 hectares of land south of Cambridge Avenue being part Lot 3 in DP 736881. This land is affected by an easement for transmission lines owned by the Electricity Transmission Authority;
- Approximately 3 hectares of land adjoining the Georges River is riparian land, bush fire prone and flood effected;
- Approximately 15 hectares of landfill (may facilitate ancillary land uses); and
- Approximately 2 hectares may be required in setback and buffers including a possible set back of 25 metres from existing rail lines under clause 86(1) of SEPP Infrastructure (2007).

Studies of the site and in particular the approximate 28 hectares of developable land indicate:

- There are no Aboriginal culture issues that would prevent the site being rezoned for industrial land uses;
- While species-poor there is a discernible pattern across the vegetation that indicates the woodland vegetation is characteristic of the Shale Plains Woodland sub-category of Cumberland Plain Woodland;
- There is no critical habitat or threatened species, populations or ecological communities, or their habitats;
- With the exception of the riparian corridor and a small area adjacent to Cambridge Avenue at the south eastern corner, the site is not subject to 1 in 100 year flooding;
- From a geotechnical perspective the land can be zoned for industrial land uses; and
- The site's previous land use activities do not prevent the land from being rezoned to allow industrial land uses.



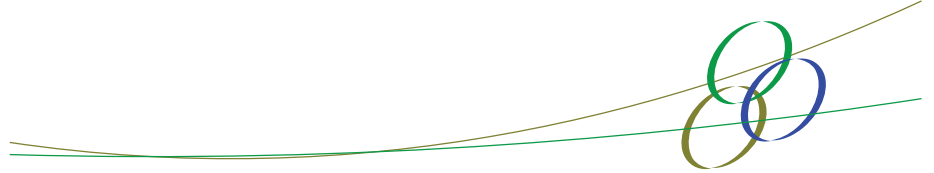
On the basis of 28 hectares of developable land at a density of 1:1 Floor Space Ratio for most of site and 0.3:1 FSR for some of site, this would yield approximately 200,000 square metres (sqm) of Floor Space Area.

Warehouse employment densities are usually estimated at 1 employee every 160 sqm Floor Space Area with some warehouse and transport employment densities as high as 1 employee to 250 sqm Floor Space Area. Therefore approximately 1,250 direct jobs could be created from 200,000 sqm of Floor Space Area.

Studies of the infrastructure servicing the site and in particular the approximate 28 hectares of developable land indicate:

- Electricity, sewer, water, telecommunications and gas can be supplied to the site;
- Significant public transport investment in rail & bus services close to the site will improve accessibility to this site and reduce car reliance in the area;
- Good access to rail and bus services at Glenfield Rail Station;
- Good connectivity and direct access to Sydney's Motorway Network and the surrounding sub-arterial road network; and
- Capacity on the local road network with the flexibility of upgrading the local road network to cater for future traffic growth if required.

Investigation of the site and related infrastructure show the site could deliver approximately 1,250 direct jobs that will contribute to the future sustainable growth of the South West Subregion and the Campbelltown LGA.



2 INTRODUCTION

On 31 March 2006, the NSW Government gazetted a standard instrument for preparing new Local Environmental Plans (LEPs), also known as the LEP template. Local plans across NSW will now use the same planning language, making it easier for communities to understand what is proposed for their local area. Councils are able to include localised planning objectives and provisions specific to their area, as well as determine zoning, additional land uses, heritage items, and development standards such as height and minimum lot sizes.

The Standard Instrument (Local Environmental Plans) Amendment Order 2011 (the amending order) was published on 25 February 2011. It amends the Standard Instrument (Local Environmental Plans) Order 2006 (SI order) including the Standard Instrument—Principal Local Environmental Plan (SILEP).

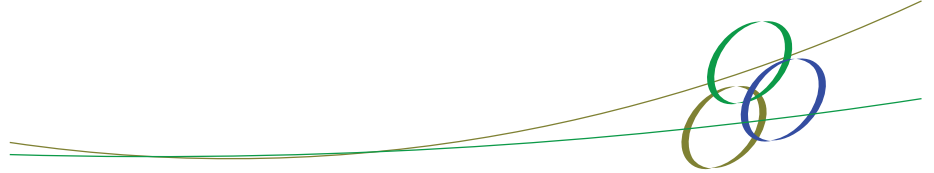
Campbelltown City Council (Council) is currently preparing a Standard Instrument Local Environmental Plan (SILEP) for the Campbelltown City Council Local Government Area.

The Council's SILEP will address strategic issues such as the location of the urban boundary, housing targets, employment growth, transport nodes and rezoning of sites plus amalgamate approximately eight main local planning instruments some of which are old Interim Development Orders.

The Glenfield Waste Site (GWS) is located at Cambridge Avenue Glenfield NSW. The GWS northern parcel of land is located in Liverpool City Council's Local Government Area. The GWS southern parcel of land is located in the Campbelltown City Council's Local Government Area.

On behalf of the owners of GWS, Environmental Property Services (EPS) has prepared this submission to rezone the southern parcel of land located in the Campbelltown City Council Local Government Area.

The purpose of this submission is to demonstrate the merits of rezoning the southern parcel of land as part of the Council's SILEP process.



3 CONTEXT

The rezoning of the southern parcel of land has been identified in previous Council studies and reports.

In 2007 Council resolved to formally invite JC & FW Kennett Pty Limited & Figela Pty Limited (owner) to lodge a rezoning application for the southern parcel of land.

After Council received and endorsed the owner's preliminary rezoning submission Council lodged an application with the Department of Planning (DOP) on 14 January 2008 for the rezoning of the southern parcel of land. The DOP advised on the 2 February 2008 it supported in principle the rezoning of the southern parcel of land.

Due to the global financial crisis and other issues the owners did not pursue the rezoning of the southern parcel of land.

The rezoning of the southern parcel of land for employment lands is consistent with the regional, sub-regional and local strategies which strategically guide the management of future population growth in the Sydney Metropolitan area, the South Western Region of Sydney and the Campbelltown LGA.

3.1 The Glenfield Waste Site & the Southern Parcel of Land

The Glenfield Waste Site

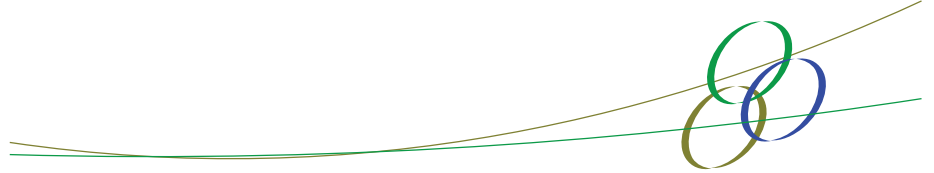
The Glenfield Waste Site is a triangular shaped parcel of land bounded by the Georges River to the east, the Southern Rail Line to the west and the Glenfield residential area to the south as illustrated in Figure 3-1.

The Glenfield Waste Site is bisected by a local government boundary (LGA) i.e. the Liverpool LGA to the north, and Campbelltown LGA to the south as illustrated in Figure 3-1.

The Southern Parcel of Land

The southern parcel of land is approximately 60 hectares and located at Cambridge Avenue Glenfield (the site). The site is illustrated in the locality sketch Figure 3-2, aerial view Figure 3-3 and site plan Figure 3-4.

A site analysis plan showing the site characteristics, infrastructure and adjoining land uses is attached in Appendix 1.



The main features in the site analysis plan are:

- The site has an elevation that ranges from approximately 20 metres Australian Height Datum (AHD) in the south-western section of the site to approximately 10 metres AHD in the north-eastern and north-western sections of the site. The majority of the site drains towards the east;
- The Georges River forms the eastern boundary of the site;
- With the exception of the riparian corridor the site is not subject to a 1 in 100 year flood;
- The riparian area is bushfire prone;
- The site has land filled areas and non-land filled areas;
- While species-poor there is a discernible pattern across the vegetation that indicates the woodland vegetation is characteristic of the Shale Plains Woodland sub-category of Cumberland Plain Woodland; and
- Significant infrastructure impacts the site i.e. Cambridge Avenue splits the site, the East Hills Rail Line is located on the northern section of the site and electricity transmission lines and infrastructure are located on the southern section of the site.

Rezoning is proposed for the entire site within the Campbelltown LGA. The proposed SILEP zones for the site are based on the current and future function and role of the site as determined by relevant strategies and the site's opportunities and constraints.

The rezoning submission has been guided by the SILEP standard zones, Department of Planning & Infrastructure (DOP&I) SILEP Circulars and Practice Notes and relevant State or Regional planning provisions (including State Environmental Planning Policy (SEPPs), *Environmental Planning & Assessment Act 1979* Section 117 Directions and Metropolitan, Regional and Local Strategies).

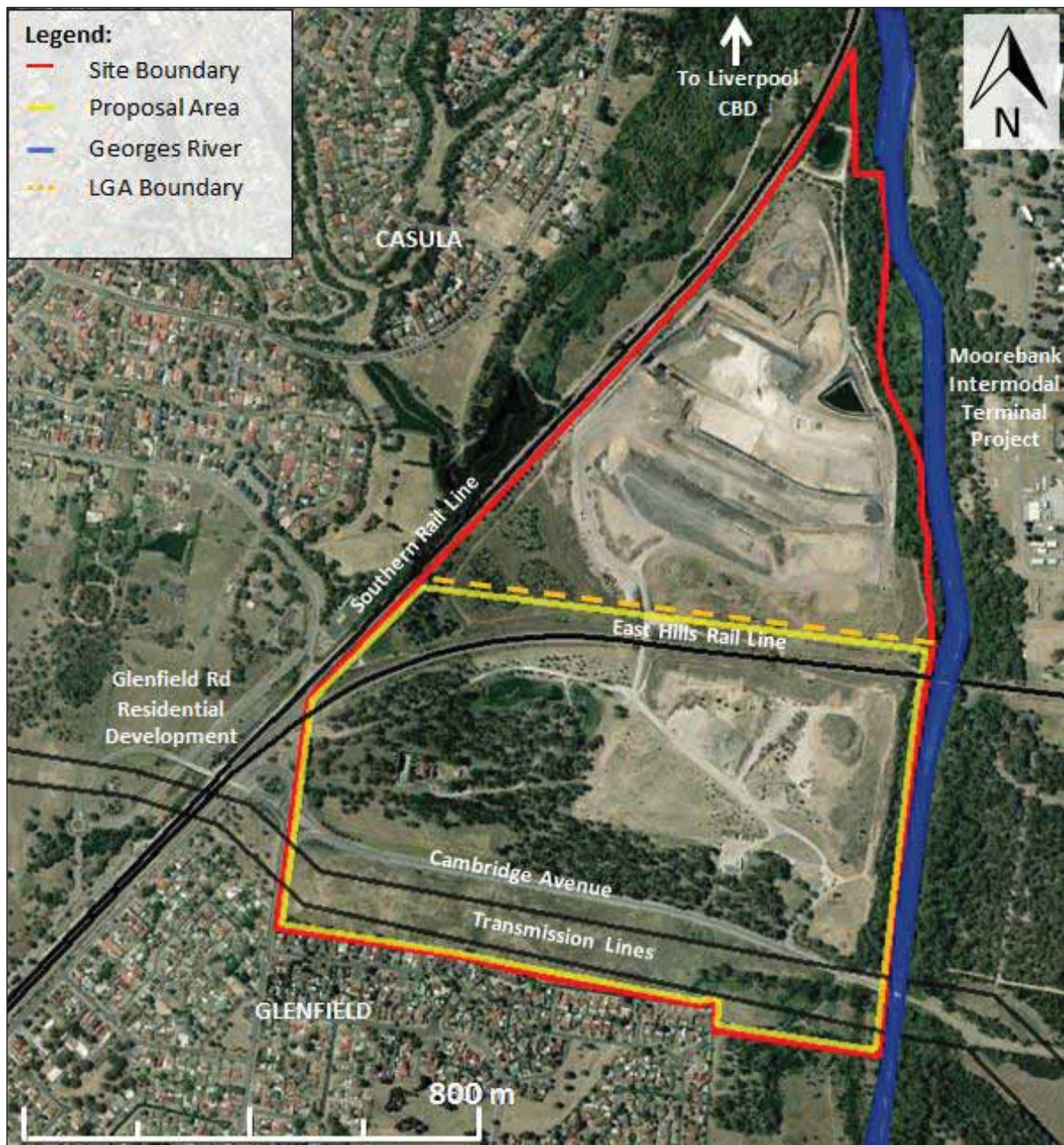
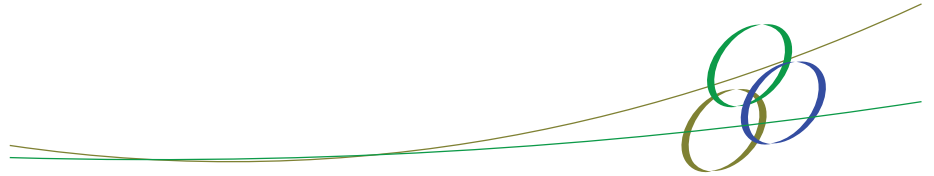


Figure 3-1: Site Location

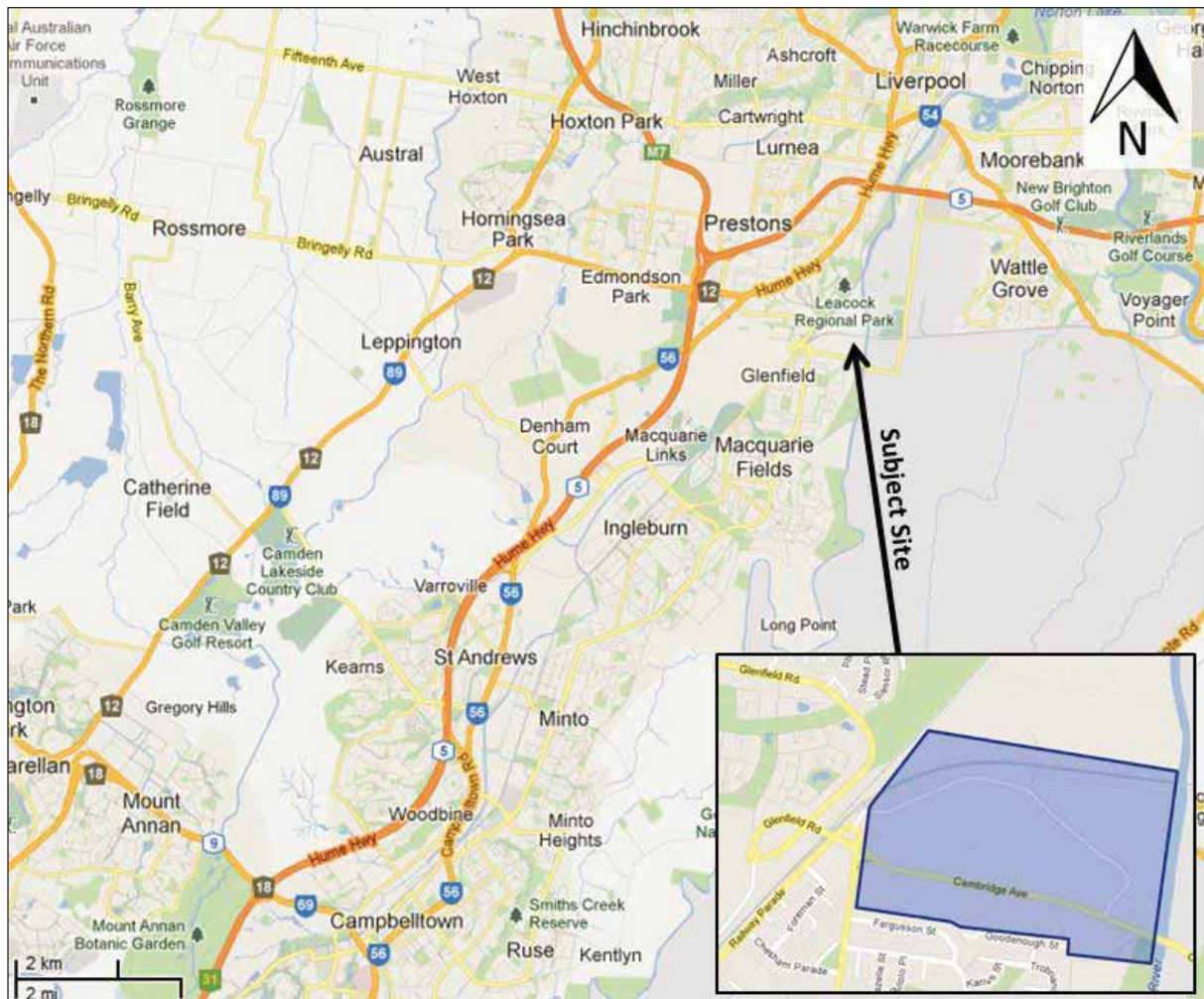
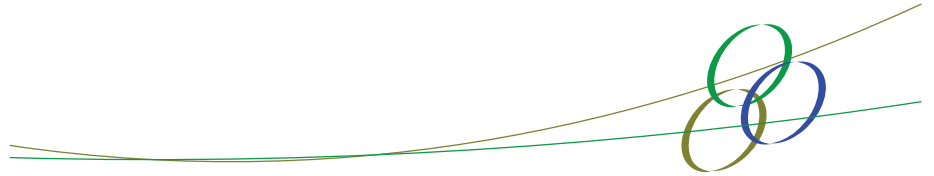


Figure 3-2: Locality Sketch

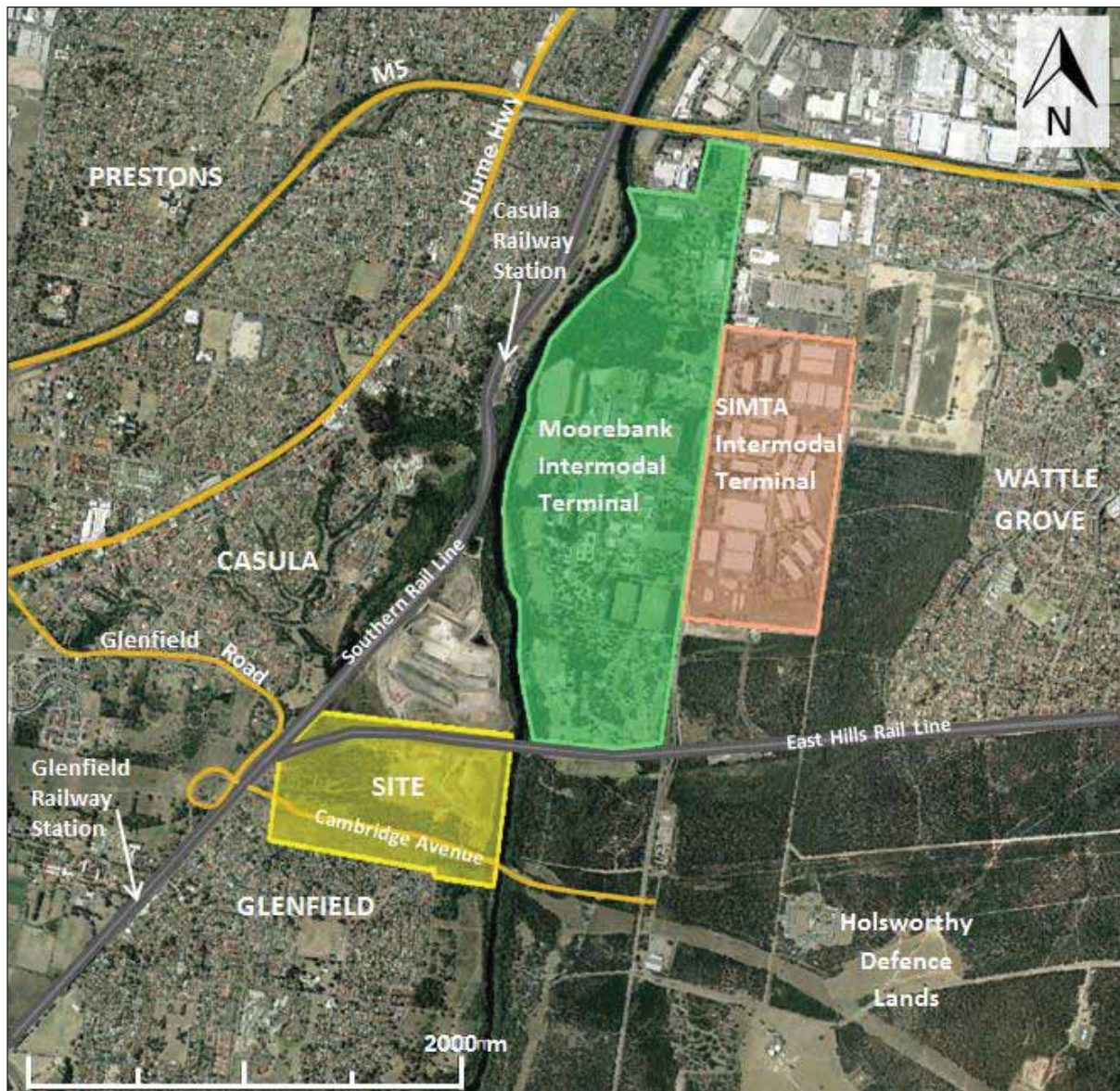
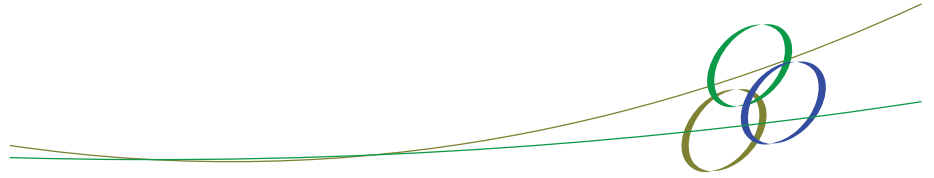


Figure 3-3: Aerial View

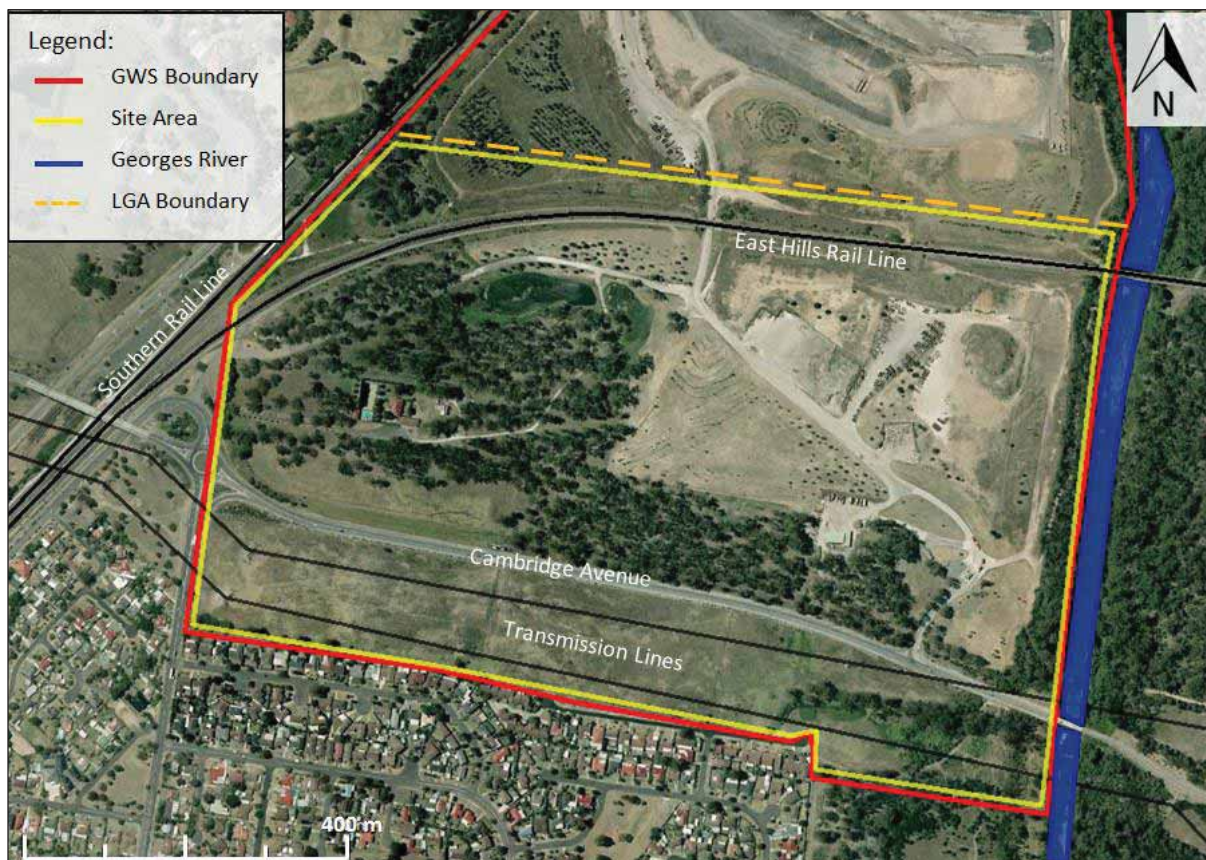
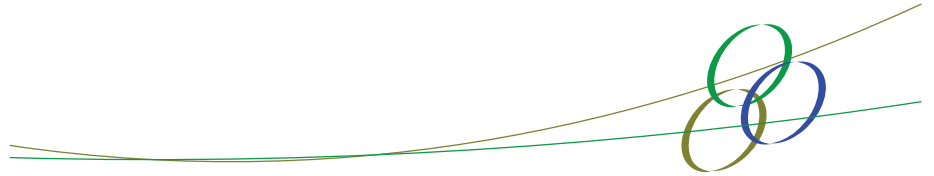


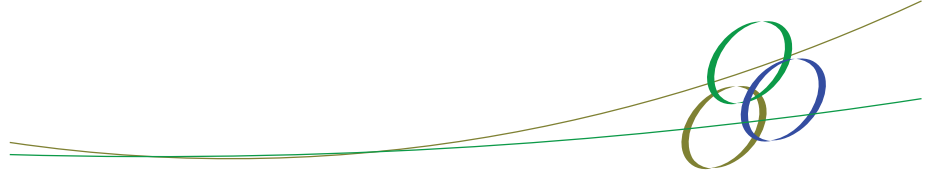
Figure 3-4: Site Plan

3.2 Current Zoning and Land Use

Current Zoning

The Campbelltown (Urban Area) Local Environmental Plan 2002 zoning plan outlines the zoning of the property as illustrated in Figure 3-5 and described as follows:

- The majority of the site is Zone 1(a) – Rural A Zone;
- A strip of land on the boundary with the Georges River is Zone 6(b) Regional Open Space Zone; and
- Part of the site adjoining Cambridge Avenue is Zone 5(b) Special Uses Arterial Roads Zone.



Waste is delivered to the landfill cell where it is then sorted for recyclables (brick, concrete, steel timber etc.) and processed by shredding prior to being compacted to minimise the cubic metre capacity and maximise the density. This in turn allows for a longer lifespan of the landfill cell, which is important as space is a limited resource and suitable landfill sites are well documented to be in short supply within the Sydney Metropolitan Area.

At the end of each day, waste that has been placed in the cells and compacted is covered with a layer of the extracted soil/clay/shale. This minimises odour and prevents litter from escaping into the surrounding environment. The excess shale and sandstone are exported from the site as a saleable resource and used in the building and construction industries.

The primary land use activity conducted on the southern parcel of land is recycling of waste which is predominantly construction and demolition waste.

The southern parcel of land is located on Cambridge Avenue Glenfield. The Glenfield waste disposal facility is accessed from Cambridge Avenue. The southern parcel of land accommodates the weigh bridge, the site office, mechanical plant workshop and the site manager's premises/offices. Operationally it serves as the depot for various plant and earth moving equipment, bin storage areas and sediment control basins for storm water management. Importantly, the southern parcel of land provides the access to the northern parcel of land.

During land fill operations vehicles transporting non – putrescible solid waste enter the waste disposal facility from Cambridge Avenue. The vehicle is weighed and the load is inspected for wastes that will not comply with the landfill's waste licence and acceptance criteria. If the waste is acceptable the load is either taken to the recycling area on the southern parcel of land or the landfill area on the northern parcel of land. After the vehicle off loads the waste the vehicle returns to the weigh bridge, is weighed then exits the waste disposal facility via Cambridge Avenue. The operation's layout is illustrated in Figure 3-6 below.

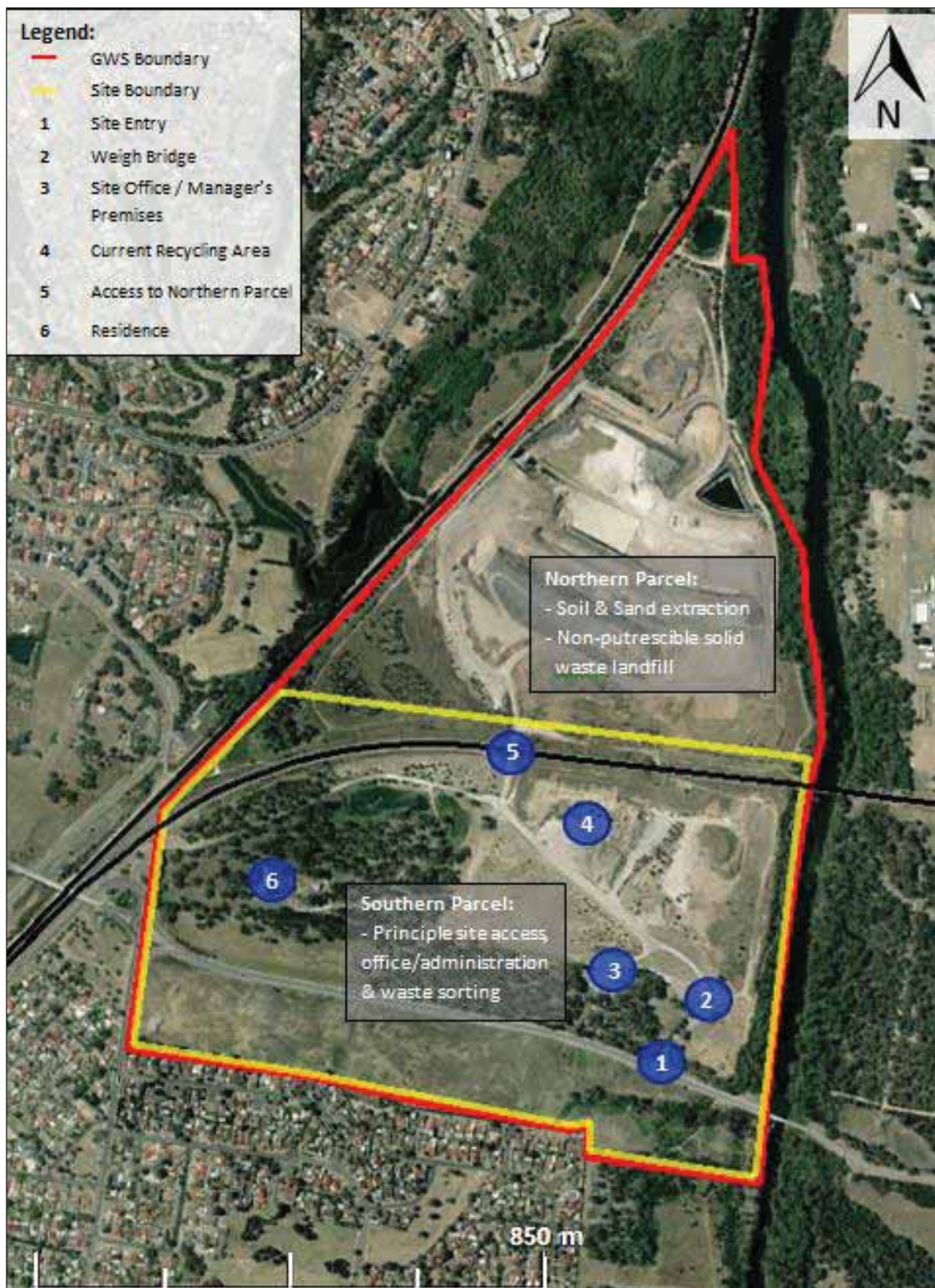
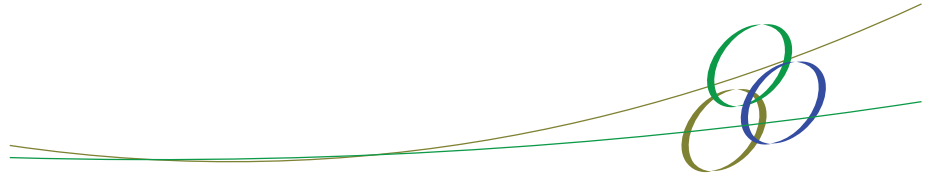
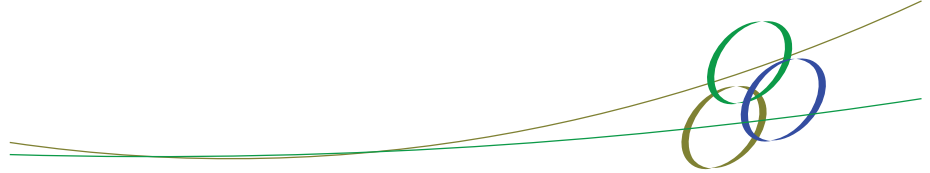


Figure 3-6: Site Operations



Short to Medium Term Land Use Activities

The Glenfield Waste Site's northern and southern parcels of land will continue in the short term, to operate as described under "Current land use activities".

As part of the owner's broader strategy to promote sustainable practices while improving the viability of the operation, GWS proposes to increase the southern parcel's recycling operations.

Subject to planning approval the expanded recycling operation will recycle a number of waste streams with the bulk of the waste being construction and demolition (C&D) waste. The C&D waste will consist of timber, green waste, concrete, brick and asphalt. Recycling will also include virgin excavated natural material (VENM) and excavated natural material (ENM).

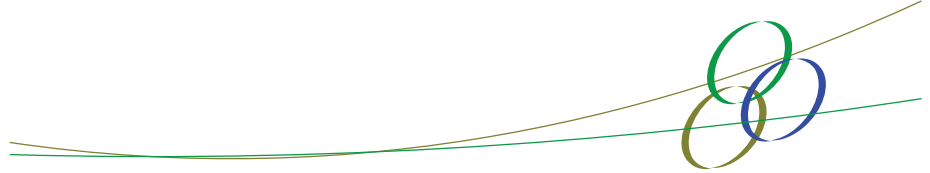
The owner has entered into an agreement with Boral Resources (NSW) Pty Limited to operate the expanded recycling facility. Boral has significant experience in establishing and running similar facilities in both NSW and the ACT and applying best practice recycling facility environmental and management procedures.

Under direction from OEH the preliminary waste recycling facility footprint, as illustrated in Appendix 3 will be located on virgin land i.e. not landfilled.

The location of the waste recycling facility is based on OEH's advice that setting up and licencing a waste recycling facility on virgin land is preferred from an OEH licencing perspective. There is 15 hectares of landfill on the southern parcel of land as illustrated in Appendix 4.

The alternative is to establish and run the waste recycling facility on a completed landfill area. In this scenario the owner would be required to prepare a closure plan, pursuant to s76 of the Protection of the Environment Operations Act 1997 (PEO) and relevant EPL conditions for that part of the landfill where the waste recycling facility would operate.

Subject to the closure plan being approved by the Environmental Protection Authority (EPA) the landfill area with the recycling facility would be excised from the EPL licence. The land on which the waste recycling facility is located would then be the subject of a separate licence. Due to OEH licencing complexities this option would take some time to achieve and would delay the establishment of the C&D waste recycling facility.



Medium to Long Term Land Use Activities

To facilitate industrial development on the site amendments to the existing operation will be planned and implemented. A closure plan for the southern parcel of land will be undertaken in accordance with the Protection of the Environment Operations Act 1997 (PEO) and the relevant EPL conditions.

The closure plan describes the steps necessary to close the landfill in accordance with the statutory closure requirements and details the post-closure care activities that include monitoring and maintaining the waste containment systems and monitoring groundwater to ensure that waste is not escaping and polluting the surrounding environment. It should be noted that the owners have not operated an active landfill cell within the Campbelltown LGA for in excess of 20 years. Monthly groundwater and gas data monitoring over this period have shown results to be within the “normal” background levels.

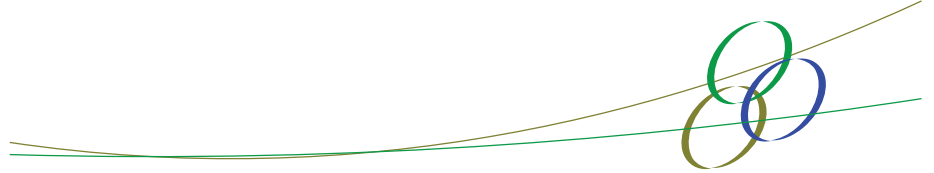
Subject to planning approval the southern parcel of land would then be developed for industrial uses with a focus on warehousing and logistics.

While the southern parcel of land is approximately 60 hectares there is only approximately 28 hectares of land potentially available for industrial development. The following parts of the site will most likely not be suitable for traditional industrial development:

- The 12 hectares of land south of Cambridge Avenue being part Lot 3 in DP 736881. This land is affected by an easement for transmission lines owned by the Electricity Transmission Authority;
- Approximately 3 hectares of land adjoining the Georges River is riparian land, bush fire prone and flood effected;
- Approximately 15 hectares of landfill as shown in Appendix 4 (may facilitate ancillary land uses); and
- Approximately 2 hectares may be required in setback and buffers including a possible set back of 25 metres from existing rail lines under clause 86(1) of SEPP Infrastructure (2007).

On the basis of approximately 28 hectares of developable land at a density of 1:1 Floor Space Ratio (FSR) for most of site and 0.3:1 FSR for some of site this would yield approximately 200,000 sqm Floor Space Area (FSA).

Warehouse employment densities are usually estimated at 1 employee every 160 sqm FSA with some warehouse and transport employment densities as high as 1 employee to 250 sqm FSA. Therefore approximately 1,250 direct jobs could be created from 200,000 sqm of FSA.



The location of any industrial development will be made at the development application stage in response to the site's opportunities and constraints to ensure that the industrial development's scale, mass and character serves to enhance the character of the local area and provide a sense of place in accordance with industrial design best practice. A preliminary subdivision/site plan is shown in Appendix 5. Examples of the types of warehouse buildings that could be constructed on the site are shown in Appendix 6.

In due course it is intended that a staged closure plan be implemented and the recycling facility moved from the southern parcel of land to the northern parcel of land and located within the Liverpool LGA. While the current environmental protection licence and the Liverpool planning consent will accommodate this long term plan, a number of operational constraints prevent the move to the northern parcel of land in the short term.

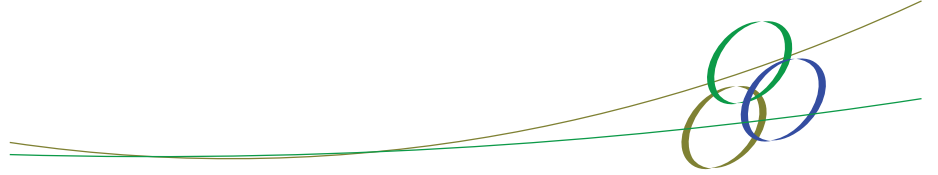
The Sydney Intermodal Terminal Alliance's (SIMTA) intermodal project is identified in Figure 3-3. The project will influence the future land uses on the northern parcel of land and possibly enhance the operations on the southern parcel of land.

The SIMTA site covers approximately 83 hectares. The proposal is for an intermodal terminal that will operate 24 hours a day, seven days a week with a capacity to process 500,000 containers per year by 2021 and one million containers per year by 2031.

Goods will arrive to the SIMTA site in containers from Port Botany by rail, along the Southern Sydney Freight Line (SFFL). Some containers will be unpacked onsite, and either stored in warehouses or distributed on smaller trucks. Some containers will be transferred directly from train to truck and distributed in the local catchment area.

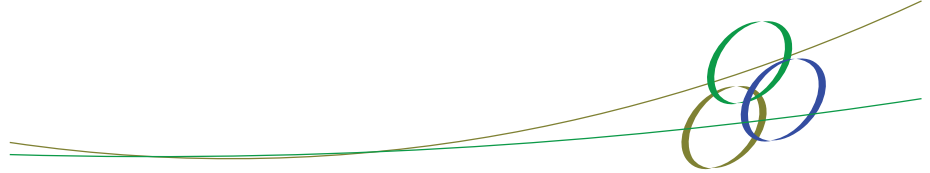
Fundamental to SIMTA's operation is connection to the SFFL. The connection to the SFFL will include a rail link through the GWS northern parcel of land as shown in Appendix 7.

The rail link through the GWS northern parcel of land will provide more scope for integrating the southern parcel of land into the State significant Moorebank to Prestons and Minto freight industry cluster/corridor.



4 REZONING SUBMISSION OBJECTIVES OR INTENDED OUTCOMES

The objective of the rezoning submission is to enable the development of Industrial uses, except for a corridor of public open space along the Georges River frontage and some land adjoining Cambridge Avenue identified for future road Infrastructure.



5 REZONING SUBMISSION EXPLANATION OF PROVISIONS

The submission seeks to rezone the site as part of the Campbelltown City Council's SILEP for the Campbelltown LGA.

Rezoning Land Currently Zone 1(a) – Rural A Zone in the Campbelltown (Urban area) Local Environmental Plan 2002.

The submission recommends the area of site Zone 1(a) – Rural A Zone be zoned IN1 General Industrial under the Campbelltown City Council's SILEP as illustrated in Appendix 8.

The Department of Planning & Infrastructure (DOP&I), as part of the producing the Exempt and Complying Development Codes SEPP 2008, issued a guide for determining SILEP equivalent zones for the Campbelltown (Urban area) Local Environmental Plan 2002 zones.

Based on information provided by Campbelltown City Council, including the objectives and permissible land uses to the DOP&I the SILEP equivalent zone for the Campbelltown (Urban area) Local Environmental Plan 2002 Zone 1(a) – Rural A Zone is Zone RU2-Rural Landscape.

The SILEP land use table for the Zone RU2 Rural Landscape is:

Zone RU2 Rural Landscape

Direction - The following must be included as either "Permitted without consent" or "Permitted with consent" for this zone:

Environmental protection works

Farm buildings

Roads

1 Objectives of zone

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.*
- To maintain the rural landscape character of the land.*
- To provide for a range of compatible land uses, including extensive agriculture.*

2 Permitted without consent

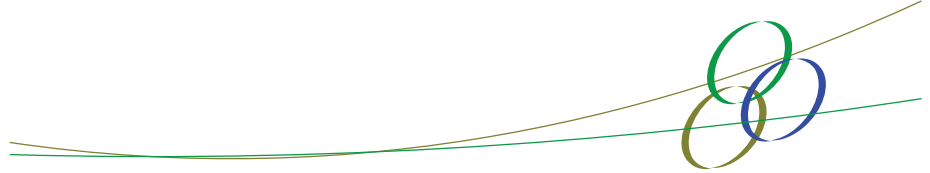
Extensive agriculture; Home occupations

3 Permitted with consent

Dwelling houses

4 Prohibited

(blank)



The objectives of the zone are primary production focused and the land use table mandates Dwelling houses as permissible with consent in the RU2 Rural Landscape zone.

The DOP&I's LEP Practice Note 11-002 (Preparing LEPs using the Standard Instrument: standard zones) specifies the purpose of the Zone RU2 Rural Landscape as:

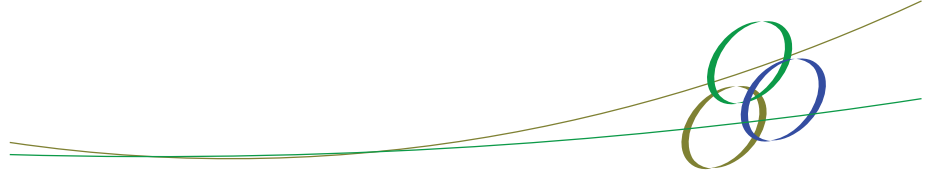
"To be used for rural land used for commercial primary production that is compatible with ecological or scenic landscape qualities that have been conserved (often due to topography). It may apply to land that is suitable for grazing and other forms of extensive agriculture, or intensive plant agriculture (such as viticulture), but where the permitted uses are usually more limited and differ from RU1 land due to landscape constraints. This zone is not to be used where the main purpose of the zone is to protect significant environmental attributes or to provide for rural residential accommodation".

Based on the SILEP Zone RU2 Rural Landscape, objectives, land use table and the DOP&I's guidance on the purpose of the Zone RU2-Rural Landscape the RU2 zone is not the appropriate zone for the area of site currently Zone 1(a) – Rural A Zone under the Campbelltown (Urban area) Local Environmental Plan 2002 for the following reasons:

- The site is located in an urban area and not a primary production or agriculture area. There are residential areas located to the west and south of the site and two regionally significant industrial and transport infrastructure developments will be located to the north east of the site;
- The site is unsuitable for commercial primary production because part of the land is landfill. The area of virgin land available for primary production is not large enough for a commercially viable primary production business;
- A rural use of the site does not reflect the highest and best use of the site;
- The RU2 Rural Landscape land use table mandates dwelling houses as permitted with consent. The East Hills Rail Line running through the site, the Northern and Southern Flyovers, the proposed SIMTA rail infrastructure on the northern parcel of land and the land fill areas make the site potentially unsuitable for any residential development; and
- The current land use activities, the short to medium term land use activities and the medium to long term land use activities described are not appropriate land use activities in a RU2 Rural Landscape zone.

The site's current and planned future land use activities/developments include "recycling facilities" and "warehouse and logistics".

The SILEP Direction 5 specifies the types of development that may be included in a SILEP zone land use table while the SILEP dictionary defines each development term.



The recycling facilities SILEP development type and definition is:

resource recovery facility means a building or place used for the recovery of resources from waste, including works or activities such as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.

Note. Resource recovery facilities are a type of waste or resource management facility—see the definition of that term in this Dictionary.

The warehouse/logistics SILEP development type and definition is:

Warehouse or distribution centre means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made.

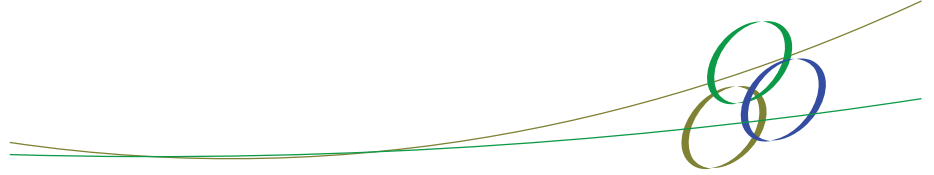
The DOP&I's LEP Practice Note 11-003 (Preparing LEPs using the Standard Instrument: definitions) explains the relationship between land use terms, sets out the land use group term, the land use subsets and the land use terms that are outside a land use group term but have a land use relationship with the group term.

Practice Note 11-003 classifies resource recovery facility as part of the waste or resource management facility group term which falls under the broad development heading of Infrastructure – water and waste.

Practice Note 11-003 identifies warehouse or distribution centre as being outside the industry group term, the rural industry group term, the storage premises group term and the heavy industrial storage establishment group term. However a warehouse or distribution centre does have a land use relationship with each of the group terms.

The next step is to ascertain the most appropriate SILEP zone for a resource recovery facility and a warehouse or distribution centre.

After considering the DOP&I's guidelines, the SILEP land use tables including the mandated permissible uses and prohibited uses and the SEPP (Infrastructure) 2007 the SILEP IN1 General Industrial zone or the IN2 Light Industrial zone would be the most appropriate zones for a resource recovery facility and a warehouse or distribution centre.



The SILEP land use table for the Zone IN1 General Industrial is:

Zone IN1 General Industrial

Direction - The following must be included as either "Permitted without consent" or "Permitted with consent" for this zone:

Roads

1 Objectives of zone

- *To provide a wide range of industrial and warehouse land uses.*
- *To encourage employment opportunities.*
- *To minimise any adverse effect of industry on other land uses.*
- *To support and protect industrial land for industrial uses.*

*2 Permitted without consent
(blank)*

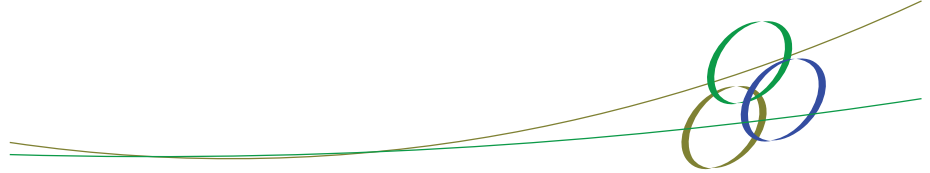
3 Permitted with consent

Depots; Freight transport facilities; General industries; Industrial training facilities; Light industries; Neighbourhood shops; Warehouse or distribution centres

*4 Prohibited
(blank)*

The DOP&I's LEP Practice Note 11-002 specifies the purpose of the IN1 General Industrial as:

"To accommodate a wide range of industrial and warehouse uses and includes general industry, high technology industries, industrial training facilities and depots. This zone would be suitable where council wishes to have a range of industrial land uses and other compatible land uses generally catered for in an industrial zone. In 2011 a new objective was added to highlight that the purpose of industrial zones is to support and protect industrial land for industrial uses".



The SILEP land use table for the Zone IN2 Light Industrial is:

Zone IN2 Light Industrial

Direction - The following must be included as either "Permitted without consent" or "Permitted with consent" for this zone:

Roads

1 Objectives of zone

- To provide a wide range of light industrial, warehouse and related land uses.*
- To encourage employment opportunities and to support the viability of centres.*
- To minimise any adverse effect of industry on other land uses.*
- To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.*
- To support and protect industrial land for industrial uses.*

*2 Permitted without consent
(Blank)*

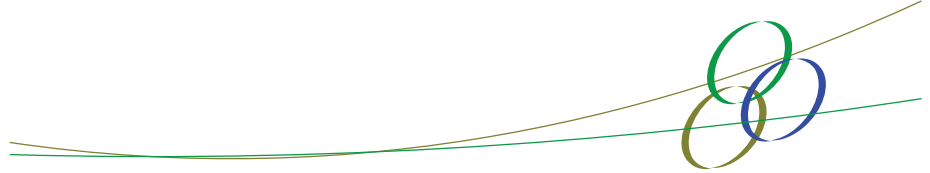
3 Permitted with consent

Depots; Industrial training facilities; Light industries; Neighbourhood shops; Warehouse or distribution centres

*4 Prohibited
(Blank)*

The DOP&I's LEP Practice Note 11-002 specifies the purpose of the IN2 Light Industrial as:

Providing a range of 'light industry', 'warehouse, or distribution centres' and 'depots'. Vehicle trade and other service industries may also be considered appropriate. The types of uses may need to be light in nature, meaning they will not cause nuisance or adversely affect the surrounding amenity for example by way of noise or emissions. It is important that bulky goods retailing occurs in business zone and not in an industrial zone. Such an outcome would ease pressure on employment lands. In 2011 a new objective was added to highlight that the purpose of industrial zones is to support and protect industrial land for industrial uses".



Based on the SILEP IN1 General Industrial land use table and the DOP&I's guidance on the purpose of the IN1 General Industrial zone the IN1 zone is the most appropriate zone for that area of the site currently Zone 1(a) – Rural A Zone under the Campbelltown (Urban area) Local Environmental Plan 2002 for the following reasons:

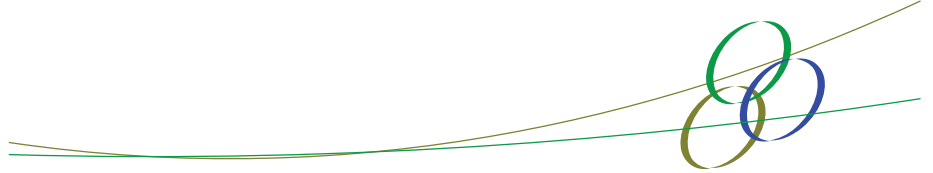
- The 2010 Metropolitan Plan for Sydney 2036 identifies the site as part of the Moorebank to Prestons and Minto significant freight industry cluster. The IN1 zone could provide more scope to integrate the site into the Moorebank to Prestons and Minto freight industry cluster;
- The 2007 draft South West Subregional Strategy 2031 identifies the Glenfield Waste facility as possibly providing employment land for light manufacturing, local industry and urban services. Local industry includes both IN1 and IN2 land use activities. To ensure all possible industrial land uses are permissible on the site with consent the IN1 zone should be applied;
- Two major intermodal developments to the north east of the site in Moorebank will be developed in the near future i.e. the SIMTA Intermodal Terminal and Moorebank Intermodal Terminal;
- The SIMTA rail infrastructure on the northern parcel of land that will link into the Southern Sydney Freight Line could encourage land use activities on the southern parcel of land that are more suitable in an IN1 zone; and
- The current land use activities, the short to medium term land use activities and the medium to long term land use activities are suitable land use activities in an IN1 General Industrial zone.

Rezoning Land Currently Zone 6(b) Regional Open Space in the Campbelltown (Urban area) Local Environmental Plan 2002.

The submission recommends the majority of the land adjoining the Georges River currently Zone 6(b) Regional Open Space under the Campbelltown (Urban area) Local Environmental Plan 2002 be Zone RE1 Public Recreation in the Campbelltown City Council's SILEP as illustrated in Appendix 8.

The area recommended for rezoning to an RE1 zone and the area currently Zone 6(b) Regional Open Space is identified in Appendix 8. The area recommended for the RE1 zone is smaller than the area currently Zone 6(b) Regional Open Space.

The area of land excluded from the current Zone 6(b) Regional Open Space area is an area of land fill and adjacent land.



The reasons for excluding this land from the RE1 zone are:

- The land is filled;
- The land is subject to the EPL conditions and the provisions of the Protection of the Environment Operations Act 1997 (PEO);
- Boreholes and a sub-surface gas monitoring bore location required by the EPL to monitor water and gas are located in this area;
- The owner is responsible for managing the landfill in accordance with the EPL conditions;
- The owner's future closure plan will include this area of land;
- The owner will have ongoing responsibilities for this area of land as part of the closure plan;
- The owner is required under the EPL to control any activity on the landfill area; and
- The owner does not expect the Campbelltown City Council to acquire filled land.

The DOP&I SILEP equivalent zone for the Campbelltown (Urban area) Local Environmental Plan 2002 Zone 6(b) Regional Open Space is Zone RE1 Public Recreation.

The SILEP land use table for the Zone RE1 Public Recreation is:

Zone RE1 Public Recreation

Direction The following must be included as either "Permitted without consent" or "Permitted with consent" for this zone:

Environmental facilities

Environmental protection works

Roads

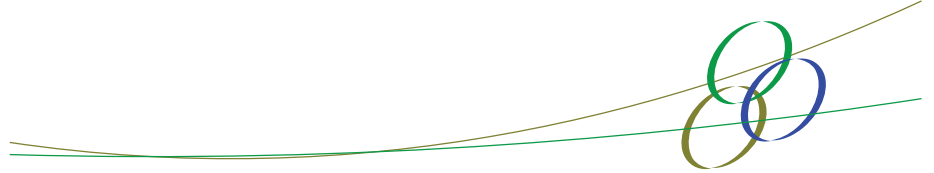
1 Objectives of zone

- *To enable land to be used for public open space or recreational purposes.*
- *To provide a range of recreational settings and activities and compatible land uses.*
- *To protect and enhance the natural environment for recreational purposes.*

*2 Permitted without consent
(blank)*

*3 Permitted with consent
Kiosks; Recreation areas*

*4 Prohibited
Any development not specified in item 2 or 3*



In the DOP&I's LEP Practice Note 11-002 the purpose of the RE1-Public Recreation zone is:

"Generally intended for a wide range of public recreational areas and activities including local and regional parks and open space. The uses may include 'recreation facilities, community facilities such as lifesaving clubs, environmental facilities environmental protection works and other uses compatible with the primary use of the land.

Where land is to be reserved for public recreation purposes (e.g. local or regional open space), the land is to be outlined and annotated on the Land Reservation Acquisition Map, and the relevant acquisition authority identified in the table in clause 5.1".

Based on the RE1 SILEP land use table and the DOP&I's guidance on the purpose of the Public Recreation zone the RE1 zone is the most appropriate zone for the majority of the land adjoining the Georges River currently Zone 6(b) Regional Open Space.

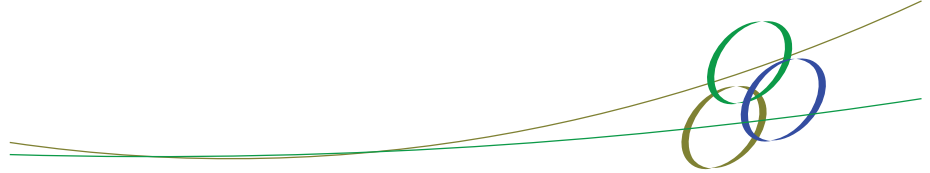
The land fill area should be zoned IN1 General Industrial and taken into account at the development application stage.

It should be noted that while the SILEP equivalent zone RE1 Public Recreation seems to be the most appropriate zone for the majority of the land Council must resolve to identify this land on the Land Reservation Acquisition Map, and nominate the relevant acquisition authority in the table in clause 5.1.

The SILEP requirement to identify the Zone RE1 Public Recreation land on the Land Reservation Acquisition Map leads to the following recommendations:

- The filled land be Zone IN1 General Industrial and retained by the owners to manage in accordance with the EPL conditions and the provisions of the Protection of the Environment Operations Act 1997 (PEO); and
- A commercial arrangement to effect the Campbelltown City Council's acquisition of the land to be zoned RE1 Public Recreation on terms satisfactory to both parties.

If Council does not resolve to identify this land on the Land Reservation Acquisition Map, and nominate the relevant acquisition authority Council may need to consider another SILEP zone for this area of land.



Rezoning Land Currently Zone 5(b) Special Uses Arterial Roads in the Campbelltown (Urban area) Local Environmental Plan 2002

The rezoning submission recommends the land Zone 5(b) Special Uses Arterial Roads under the Campbelltown (Urban area) Local Environmental Plan 2002 be Zone SP2 – Infrastructure under the Campbelltown City Council's SILEP as illustrated in Appendix 8.

DOP&I SILEP equivalent zone for the Campbelltown (Urban area) Local Environmental Plan 2002 Zone 5(b) Special Uses Arterial Roads is Zone SP2 – Infrastructure.

The DOP&I's LEP Practice Note 11-002 specifies the purpose of the SP2 – Infrastructure zone as:

"Infrastructure land is highly unlikely to be used for different purposes in the future should be zoned SP2, for example cemeteries and major sewage treatment plants.

It may be also appropriate for major state infrastructure or strategic sites such as major hospitals large campus universities/TAFEs, major dams, power stations, landfill or waste disposal sites, correctional centres, and airports. Areas of Commonwealth land used for Defence purposes should be zoned SP2 (Defence). A small minority of schools across NSW may also be considered a strategic site.

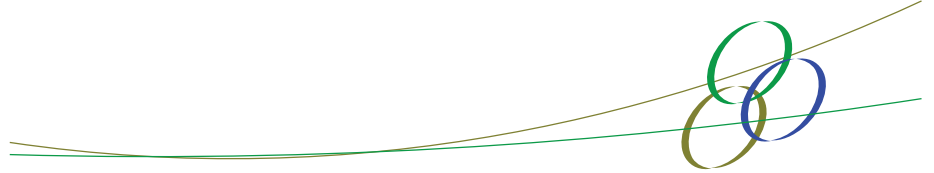
The use of clause 5.3 Development near zone boundaries is suggested when adopting SP1 or SP2 zones. This would enable development permitted on the adjoining land to be permitted if deemed compatible.

Where the land is reserved for public infrastructure purposes (e.g. railway), the land is to be outlined and annotated on the Land Reservation Acquisition Map, and the relevant acquisition authority identified in the table in clause 5.1.

The Standard Instrument definition for primary use must be applied to the Map annotation. See LEP PN 10-001 Zoning for Infrastructure in LEPs for more information."

Based on the SILEP land use table for zone SP2 and the DOP&I's guidance on the purpose of the SP2 – Infrastructure zone the SP2 zone is the most appropriate zone for the land currently Zone 5(b) Special Uses Arterial Roads.

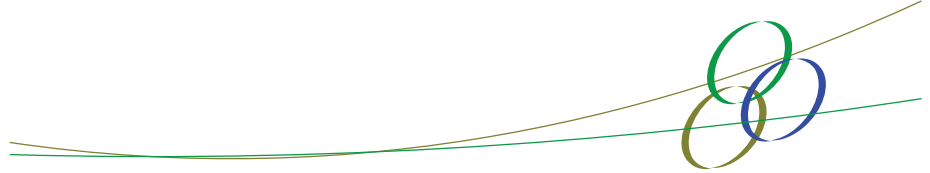
It should be noted that while the SILEP equivalent Zone SP2 – Infrastructure seems to be the most appropriate zone for the land Council must resolve to also identify this land on the Land Reservation Acquisition Map, and nominate the relevant acquisition authority in the table in clause 5.1.



If Council does not resolve to identify this land on the Land Reservation Acquisition Map, and nominate the relevant acquisition authority then Council may need to consider another SILEP zone for this piece of land.

We recognise the land currently Zone 5(b) Special Uses Arterial Roads was identified by the former Roads & Traffic Authority (RTA) as part of the north – south Georges River Parkway road corridor.

Our understanding is the Georges River Parkway road corridor is no longer being considered by the new Roads and Maritime Services (RMS) NSW State Government agency. Rather than obligate RMS to acquire this piece of land for an obsolete road plan the owners would support the adjoining IN1 General Industrial zone being applied to this land.



6 REZONING SUBMISSION JUSTIFICATION

6.1 Need for a Rezoning Submission Report

1.1.1 Is the zoning submission report a result of any strategic study or report?

Draft Campbelltown Employment Lands Review 2010 Council Report

Campbelltown City Council's Planning and Environment Committee Officer's report on the Draft Campbelltown Employment Lands Review was adopted by the Planning and Environment Committee on the 24 May 2011 and the report's recommendations adopted at Council's meeting on the 31 May 2011 by resolution minute 104. A copy of the Campbelltown City Council's Planning and Environment Committee Officer's report is attached as Appendix 9.

The review identified the Glenfield Waste Disposal site as future employment lands and recommend the land be zoned an industrial zone. The recommendations of the Draft Campbelltown Employment Lands Review are discussed in subsection 6.2.

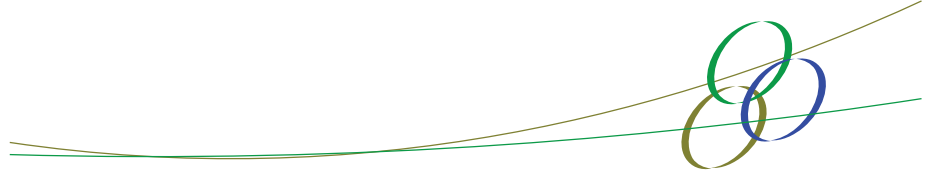
2007 Rezoning Application

A rezoning request, prepared by Architectus, was lodged with Campbelltown Council in November 2007. The request included preliminary studies by consultant experts addressing traffic, services and infrastructure and soil contamination/geotechnical issues. The lodgement was preceded by a number of discussions with Campbelltown City Council including a formal presentation in June 2007.

The minutes of the Campbelltown City Council Planning and Environment Committee of 4 December 2007 noted:

"the proposed rezoning for area 1 'Rural A zone to 4(a) General Industry is supported subject to the findings of a detailed Local Environmental Study. It is indicated the proposed rezoning would allow this part of the subject site (the southern portion) to be used for a number of industrial uses such as industries, warehouses and distribution centres and the like".

In accordance with the Committee's 4 December 2007 resolution the Campbelltown City Council sent a letter to the NSW Department of Planning (now Department of Planning and Infrastructure) dated the 14 January 2008, pursuant to section 54(4) of the EP&A Act 1979 advising, of the Council's decision to prepare a draft local environmental plan to rezone the Glenfield Waste Disposal site at Cambridge Avenue, Glenfield to permit industrial uses.



Subsequently on the 2 February 2008 the NSW Department of Planning sent a letter to the General Manager of the Campbelltown City Council supporting in principle the preparation of the draft LEP subject to a number of issues being addressed.

Due to the Global Financial Crisis and other issues at the time the owners could not complete the rezoning application of the southern parcel of land.

The opportunity to now complete the rezoning application in accordance with the old plan making provisions ceased on the 1 January 2011 under the provisions of the Environmental Planning & Assessment (EP&A) Amendment Act 2008 and EP&A Amendment (Plan Making) Regulation 2009 that commenced on the 1 July 2009.

1.1.2 Is the rezoning of land as part of the CCC SILEP the best means of achieving the objectives or intended outcomes, or is there a better way?

The Campbelltown SILEP will give the legal effect to the recommendations of Campbelltown's City Council's strategic work. Both State and Local Government strategic work indicate the majority of the site should be zoned for employment lands.

The SILEP provides a standard format for the preparation of principal LEPs by councils in New South Wales. It provides a 'toolbox' for councils developing new LEPs in that it provides standard zones and provisions.

The Campbelltown SILEP will apply to the whole of the Campbelltown City Council's Local Government Area including the southern parcel of land.

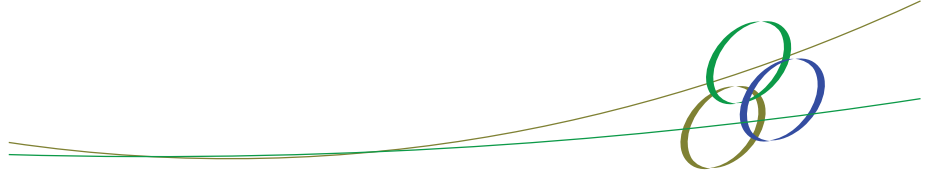
The Campbelltown City Council's SILEP is the best means of achieving the rezoning submissions objectives and intended outcomes.

1.1.3 Is there a net community benefit?

The following questions represent the Net Community Benefit Test:

- 1. Will the rezoning of the site be compatible with the agreed State and Regional strategic direction for development in the area (e.g. Land release, strategic corridors, development within 800 metres of a transit node)?*

The 2010 Metropolitan plan for Sydney 2036 identifies the freight logistics industry as a key contributor to Australia's GDP. Land and infrastructure are vital elements to this industry. Across Sydney many clusters of freight industry activity have developed in close proximity to key freight transport corridors.



The site is part of the Moorebank to Prestons and Minto significant freight industry cluster, as illustrated in Appendix 10, which is considered to be one of the State's most significant freight transport corridors.

Demand for freight transport is projected to grow rapidly over the coming decades as a result of economic and population growth. Nationally freight delivery is expected to triple between 2006 and 2050 with more containers moving through Port Botany, on motorways and dedicated rail freight lines, with increased deliveries to businesses and shops throughout Sydney.

Sydney's rail freight network is seen as a vitally important element of Sydney's freight transport infrastructure with work already underway on the Southern Sydney Freight Line, which will deliver improvements for movement of freight and connect the Main Southern Railway.

The 2007 draft South West Subregional Strategy 2031 identifies the site as possibly providing employment land for light manufacturing, local industry and urban services.

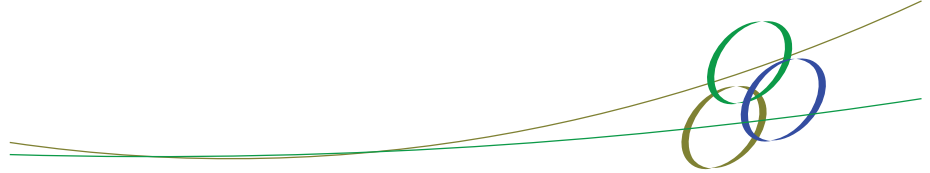
At a State and Regional level the future function and role for the site is to provide employment lands. The most appropriate SILEP zone for the majority of the site is IN1 General Industrial.

2. Is the site located in a global/regional city, strategic centres or corridor nominated within the Metropolitan Strategy or other regional/subregional strategy?

A 2010 Metropolitan plan for Sydney 2036 transport objective is to ensure population growth occurs in a manner that encourages public transport use, particularly for commute trips, to keep Sydney compact and moving. Based on the Metropolitan plan's hierarchy of centres, as well as employment/housing targets/trends and travel patterns, 46 existing and emerging multimodal transport corridors have been identified, factoring in expected growth patterns including major economic corridors, major employment areas, urban renewal of areas and dedicated growth centres e.g. South West Growth Centre.

The 46 corridors have been assessed as critical over the longer term to ensure the metropolitan area has efficient travel options and will guide the location of capacity enhancements to ensure a compact and accessible city. The site is located within one of the 46 corridors i.e. on the Liverpool to Campbelltown-Macarthur multimodal transport corridor, as illustrated in Appendix 11.

As discussed in question 1 the site is part of the Moorebank to Prestons and Minto freight transport corridor, as illustrated in Appendix 10.



The 2010 Metropolitan plan for Sydney 2036 and 2007 draft South West Subregional Strategy 2031 identify residence rail transport as vital for the sustainable development of the metropolitan area and in particular the South West Subregion. The site is located within 1.0km of the Glenfield rail station, as illustrated in Appendix 12, which is being upgraded to deliver the South West Rail link to the South West Growth Centre providing direct and frequent rail services to Liverpool, the Sydney CBD and the Global Economic Corridors. The connection of the existing rail network at Glenfield will reinforce the role of the station as an important transport interchange in the South West Subregion facilitating transfers between services on the East Hills Line, the Main South Line and the Cumberland Line.

The 2007 draft South West Subregional Strategy 2031 finds that 79% of trips by South West residents are made by private vehicle, 8.1% by public transport and 12.3% by walking or cycling. The subregion has the lowest proportion of walking and cycling trips and the highest proportion of private vehicle trips. In addition less than 45% of all workers in the South West Subregion live and work within the subregion.

A key strategic direction to increase the subregion's self-containment and use of public transport is the provision of strategic bus corridors that will provide fast, frequent, direct, and convenient bus services between Sydney's strategic centres. For the South West Subregion four strategic bus corridors have been identified. The site is located on one of these corridors i.e. the Liverpool –Campbelltown strategic bus corridor (Corridor 31), as illustrated in Appendix 13.

The site's location within a significant Metropolitan multimodal transport corridor, and 1.0km of the Glenfield rail station will provide an opportunity for not only people in the South West Subregion but other subregions to access the site by public transport.

3. Is the rezoning of the site likely to create a precedent or create or change the expectations of the landowner or other landholders?

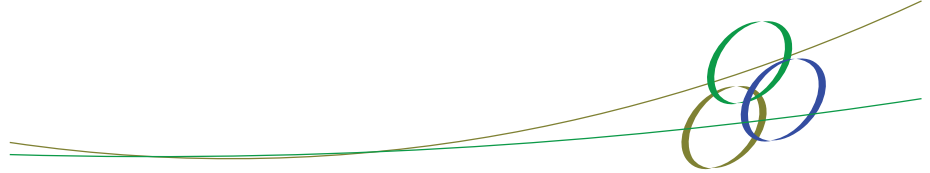
The site is a unique isolated parcel of land surrounded by established urban land uses or known future land uses. The land is strategically identified for future employment lands. Therefore the rezoning of the site will not create or change the surrounding landowners land use expectations for their land.

4. Have the cumulative effects of other spot rezoning proposals in the locality been considered?

There are no known spot rezoning proposals in the area.

5. What is the outcome of these considerations?

There are no known spot rezoning proposals in the area.



6. *Will the rezoning facilitate a permanent employment generating activity or result in a loss of employment lands?*

The rezoning will increase the amount of employment lands available in the Campbelltown LGA and the South West Subregion. The rezoning could generate 1,250 permanent direct jobs. There would also be an employment multiplier for the LGA and subregion.

7. *Will the rezoning impact upon the supply of residential land and therefore housing supply and affordability?*

The site is not suitable for residential land uses because of previous land use activities and adjoining land uses including the East Hill Rail Line. The rezoning of the land for employment lands will support the supply of affordable residential land by providing employment close to the South West Growth Centre, which will accommodate 110,000 new dwellings for 300,000 people over the next 25-30 years.

8. *Is the existing public infrastructure (roads, rails, utilities) capable of servicing the proposed site?*

SMEC's services report May 2012 states the existing electricity, sewer and water infrastructure will need to be upgraded to service a warehouse and logistics development. The report is included as Appendix 14 and report's conclusions are summarised in subsection 1.1.11.

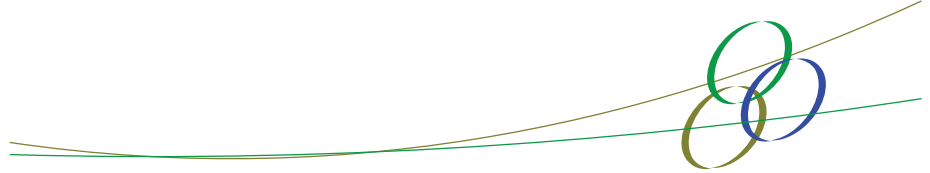
AECOM's traffic and transport report May 2012 shows the existing traffic network can accommodate an increase in traffic and from a transport perspective the site is considered to be appropriate for IN1 General Industrial land uses. The report is included as Appendix 15 and the report's findings are provided in subsection 6.3 under section 1.1.9

9. *Is there good pedestrian and cycling access?*

There is limited pedestrian cycling access. The Campbelltown City Council's Bike plan 2012 and the NSW Bike Plan May 2010 proposed bike links deliver access to the site from both Liverpool's CBD and Campbelltown's CBD.

10. *Is public transport currently available or is there infrastructure capacity to support future public transport?*

The site is located on the Liverpool to Campbelltown-Macarthur multimodal transport corridor, as illustrated in Appendix 11. The corridor has been identified as one of Sydney's key transport corridors.



The site is located within 1.0km of the Glenfield rail station, as illustrated in Appendix 12, the gateway to the South West growth centre and a key transfer node between services on the East Hills, South and Cumberland Lines and on the Liverpool–Campbelltown strategic bus corridor (Corridor 31) as illustrated in Appendix 13.

11. Will the proposal result in changes to the car distances travelled by customers, employees and suppliers? If so, what are the likely impacts in terms of greenhouse gas emissions, operating costs and road safety?

On an average weekday, 79% of trips by South West residents are made by private vehicle, 8.1% by public transport and 12.3% by walking or cycling. The South West Subregion has the lowest proportion of walking and cycling trips and the highest proportion of private vehicle trips. Associated with the private vehicle trips is less than 45% of all workers in the South West Subregion live and work within the subregion.

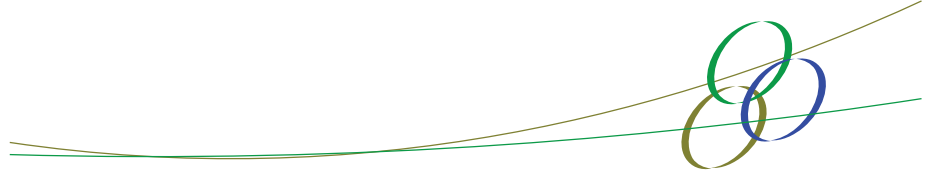
Approximately 33% of the Campbelltown LGA's resident labour force is employed within the LGA, and 66% of this labour force commutes to other areas for work.

The potential 1,250 permanent direct jobs would be within the Liverpool to Campbelltown-Macarthur multimodal transport corridor and within 1.0km of the Glenfield rail station, the gateway to the South West growth centre. The jobs would contribute to the increasing the South West Subregion's and Campbelltown LGA's employment self-sufficiency.

The site's location on the Liverpool to Campbelltown-Macarthur multimodal transport corridor and within 1.0km of the Glenfield rail station provides the opportunity for a large portion of the site's future workforce to use public transport to access the site and consequently decrease private vehicle carbon emissions and potential private vehicle accidents.

12. Are there significant Government investments in infrastructure or services in the area whose patronage will be affected by the rezoning? If so, what is the expected impact?

The rezoning of the site for industrial land uses adjacent to the current upgrading of the Liverpool to Campbelltown-Macarthur transport corridor and the Glenfield station will support the NSW Government's objective of integrating land use and transport planning to ensure that opportunities to benefit from infrastructure investment are realised.



13. Will the rezoning impact on the land that the government has identified a need to protect (e.g. Land with high biodiversity values) or have other environmental impacts? Is the land constrained by environmental factors such as flooding?

The site is subject to a number of potential environmental constraints. The site's constraints are confined to the Georges River riparian area and the area of the site with Shale Plain Woodland. The rezoning submission includes a flora and fauna assessment and preliminary flood survey work and has considered the Campbelltown City Council's environmental constraints mapping.

The site's potential environmental constraints include:

- Flood prone land;
- Flora and fauna; and
- Bushfire prone lands.

The environmental constraints are identified in the Site Analysis Plan in Appendix 1.

Flood Prone Land

Hard and Forester surveyors preliminary flood survey map May 2012, as illustrated in Appendix 16 confirms the area of the site impacted by a 1 in 100 year flood. The survey map shows the majority of the site is above the 1 in 100 year flood level. Any development of the site will take into consideration the 1 in 100 year flood level. The flood study information used to prepare the preliminary flood survey works will be discussed in subsection 1.1.9.

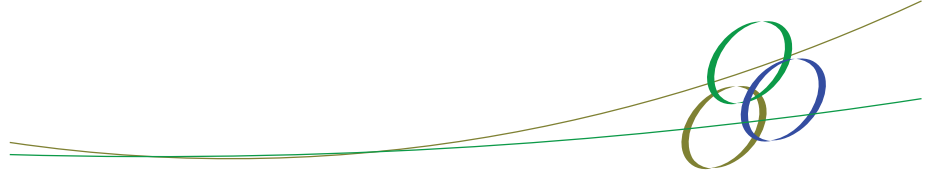
Flora and Fauna

Environmental Property Services (EPS) ecological report May 2013 reveals that the site supports Shale Plain Woodland of low to moderate condition. The relatively small size and isolation of the woodland contribute to the woodland being unlikely to support threatened fauna. The EPS flora and fauna report is included as Appendix 17 and the report's findings and conclusions will be discussed in subsection 1.1.8.

Bushfire Prone Lands

Attached is an extract from Campbelltown LGA Bush Fire Prone Land Map included as Appendix 18. The map identifies the site's Georges River riparian land as having category 1 vegetation. The majority of the developable area is not bush fire prone.

Any future development will need to comply with relevant Planning for Bushfire Protection Guidelines.



14. Will the rezoning be compatible/complimentary with the surrounding land uses? What is the impact on amenity in the location and wider community?

The site is currently used as a landfill and resource recovery facility.

The current surrounding urban land uses include Infrastructure, residential and open space.

The future urban surrounding land uses will include the current surrounding land uses plus additions to the existing infrastructure e.g. Northern rail flyover, Southern rail flyover, a rail link into the South Sydney Freight Line on Glenfield Waste Service's northern parcel of land and the development of major industrial land uses in Moorebank i.e. the SIMTA Intermodal Terminal and Moorebank Intermodal Terminal.

The rezoning will provide an opportunity to improve the current compatibility of land uses and to incorporate the site's employment land uses into the mix of infrastructure, residential, industrial and open space development. The impact on the local amenity of any industrial development on the site will be managed through setbacks, buffers, landscaping and building design.

The impact of any industrial development on the site on the wider community amenity would include increasing the South West Subregion's and Campbelltown LGA's employment self-sufficiency and consequently decreasing private vehicle carbon emissions.

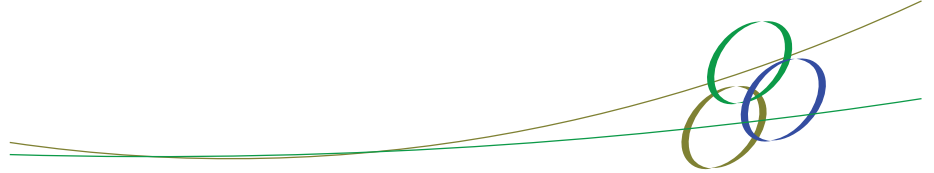
15. Will the public domain improve?

The main public land and publicly accessible space near to the site is Leacock's Regional Park.

Leacock Regional Park provides a large open space in the Liverpool LGA. From the ridge line there are views over the Holsworthy bushland and Sydney's skyline. Activities in the park are largely limited to walking trails along the banks of the Georges River. The Casula Powerhouse Arts Centre, accessed via Casula Railway Station is also proximate to the site.

Intervening features between Leacock Regional Park and the site include the Glenfield Waste Facility's northern parcel land, topography, vegetation and two large rail corridors.

The distance and intervening features between Leacock regional park and any development on the site will ensure that the Leacock regional park's existing views, sunlight, access (including disable access) or convenience will not be adversely impacted. In addition the development of the site will not unfavourably impact the existing safety of Leacock Regional Park.



The Cambridge Avenue streetscape will be subject to landscape planning as the site develops. The architectural treatment of the urban domain, particularly the opportunity to improve the streetscape, will be closely considered within future development planning.

16. Will the proposal increase choice and competition by increasing the number of retail and commercial premises operating in the area?

The potential 1,250 permanent jobs for the Glenfield area will facilitate increased demand for services which would facilitate the opportunity for increasing retail and commercial development in the Glenfield shopping precinct.

17. If a stand-alone rezoning and not a centre, does the proposal have the potential to develop into a centre in the future?

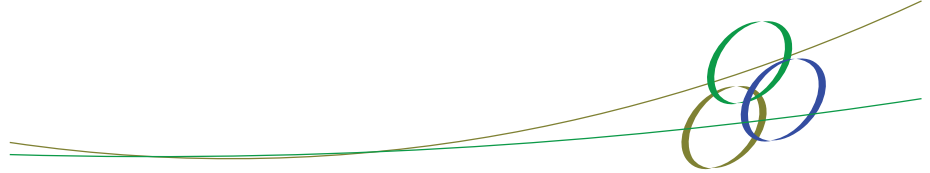
The proposal is not a centre and will not develop into a centre. The potential job opportunities will support the sustainable growth of the regional city of Liverpool, the Campbelltown/Macarthur and Leppington major centres together with the Glenfield Station neighbourhood centre.

18. What are the public interest reasons for rezoning? What are the implications of not proceeding at that time?

The site has been strategically identified to provide employment lands within a major Metropolitan multimodal transport corridor that will contribute to increasing the South West Subregion's and Campbelltown LGA's employment self-sufficiency.

The site is located in an area undergoing significant National, State and Regional strategic change and development including the upgrading of the Glenfield rail station and the development of two substantial intermodal developments in Moorebank. To make certain the site can be integrated into the impending operational Moorebank to Prestons and Minto significant freight industry cluster the site should be zoned for employment lands as part of the Campbelltown City Council's SILEP.

The implications of not rezoning the site now for employment lands is the site will not be considered by Federal or State Government and/or private enterprise as part of the freight industry development in the area because the site will not permit the land uses required to support the freight and logistics industries.



19. Summary

The answers to the questions clearly demonstrate the rezoning of the site for employment lands will facilitate a positive community benefit for the South West Subregion and the Campbelltown City Council Local Government Area.

6.2 Relationship to Strategic Planning Framework

1.1.4 Is the proposed rezoning of land for employment consistent with the objectives and actions contained within the applicable regional or sub-regional strategy?

NSW 2021 State Plan

The NSW 2021 State Plan is the NSW Government's 10 year plan to guide the government's policy and budget. The plan covers five strategies and 32 goals including:

- A. Rebuild the economy strategy and 6 goals;
- B. Return quality services strategy and 11 goals;
- C. Renovate infrastructure strategy and 3 goals;
- D. Strengthen our local environment and community's strategy and 6 goals; and
- E. Restore accountability to government strategy and 3 goals.

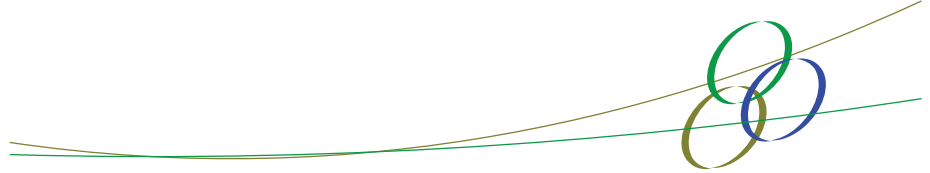
The proposed rezoning of the site is consistent with the following applicable NSW 2021 strategies:

A. Rebuild the Economy

The strategy identifies developing opportunities in the Sydney, Western Sydney, the Hunter and the Illawarra and regional NSW as crucial to rebuilding the NSW economy. The site is located in Campbelltown City Council LGA in Western Sydney. The site will assist to provide the required employment lands for the South West Subregion's future jobs targets and thus contribute to increasing the State's economic growth.

C. Renovate Infrastructure

One of the strategy's goals is to build liveable centres that will make it easier for people to travel between work and home, allowing people to spend more time with family and doing the things they choose. The plan is to encourage job growth in centres close to where people live and to provide access to public transport.



The South West Subregion has a relatively low ratio of approximately 0.7 jobs per working resident which indicates most of its residence work outside the subregion. Approximately 66% of the Campbelltown's LGA's resident labour force commutes to other areas for work.

The rezoning of the site for employment lands could potentially provide 1,250 direct permanent jobs and many more indirect jobs for the South West subregion which would contribute to increasing the subregion's and Campbelltown's LGA's employment self-containment levels.

Access to the site can be provided by public transport i.e. the site is located within 1.0 km of the Glenfield rail station, which is being upgraded as part of the South West Rail Link and located on the Liverpool to Campbelltown strategic bus corridor (number 33).

The rezoning of the site for employment lands would contribute to increasing employment within transport catchments that can be accessed by public transport.

D. Strengthen Local Environment and communities

One of the strategies goals includes improving the environmental health of rivers and protecting the riverine landscapes.

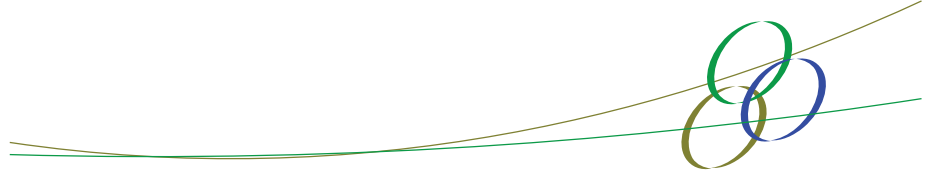
A strip of the site's land on the Georges River is currently Zone 6(b) Regional Open Space under the (Urban area) Local Environmental Plan 2002.

The proposed SILEP RE1 Public Recreation zone for the majority of this strip of land will provide protection for the riparian land. In addition the Campbelltown SILEP will adopt the SILEP Natural Resource Management (NRM) model Riparian land and waterways provision that will provide protection for all land situated within 40 metres of the top of the bank of the Georges River.

Metropolitan Plan for Sydney 2036

The 2010 Metropolitan Plan for Sydney 2036 provides the strategic framework for managing development in the Sydney Metropolitan Region. The plan covers eight strategic directions including:

- A. Strengthen a City of Cities;
- B. Growing and Renewing Centres;
- C. Transport for a Connected City;
- D. Housing Sydney's Population;
- E. Growing Sydney's Economy;
- F. Balancing Land Uses on the City Fringe;
- G. Tackling Climate Change and Protecting Sydney's Natural Environment; and
- H. Achieving Equity, Accessibility and Social Inclusion.



The strategies relevant to the site are C, E, F and G.

C. Transport for a Connected City

The site is located on the Liverpool to Campbelltown-Macarthur multimodal transport corridor. The corridor has been identified as one of Sydney's key transport corridors.

The site is located within 1.0km of the Glenfield rail station, the gateway to the South West growth centre and a key transfer node between services on the East Hills, South and Cumberland Rail Lines and on the Liverpool–Campbelltown strategic bus corridor (Corridor 31).

The rezoning of the majority of the site for employment lands:

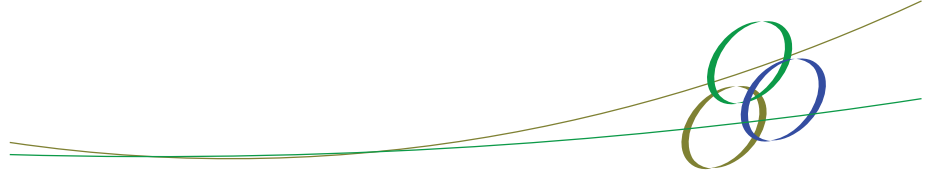
- Would unlock the sites potential to provided jobs within close proximity to a Metropolitan key transport corridor that will deliver cross regional links between regional cities and major centres; and
- Contribute to decreasing the number of people who travel to other areas for work and increase the number of people who may travel to the area for work.

E. Growing Sydney Economy

The strategy indicates Sydney will require 760,000 additional jobs to support the anticipated population growth by 2036.

The strategy aims for half of these jobs to be in Western Sydney, to match expected population growth and to increase the employment self-sufficiency of the South West Subregion. The DOP&I estimate Sydney may need 8,500 hectares of employment lands. The overarching principles for guiding Sydney's economic growth are:

- To provide jobs closer to home by setting new employment targets for each subregion; and
- Ensuring employment lands continue to meet Sydney's freight and industry needs by establishing and Employment Lands Task force.



In May 2012 a discussion paper of the 2010 Metropolitan Strategy was initiated as part of the first step in development of a new Metropolitan Strategy for Sydney. The key issues arising from the discussion paper were:

- The population estimates for 2031 are now far higher than anticipated in the 2005 Metropolitan Strategy;
- The South West Subregion is expected to experience the highest level of population growth of all Sydney's subregions;
- By 2036 Western Sydney, comprising the South West, North West and West Central Subregion will account for almost half (49%, 3 million people) of Sydney population;
- Reinforcement of the Government's priority to increase the number of jobs closer to home and increasing the percentage of the population living within 30 minutes of public transport or a city or major centre in Metropolitan Sydney; and
- The Government's focus on planning for freight and logistics from and to Port Botany and Sydney Airport.

The site is identified in the Existing and Planned Freight Clusters, Intermodal Terminals and Freight Corridor map Figure E3, illustrated in Appendix 10 as part of the Moorebank to Prestons and Minto significant freight industry cluster. In addition the site's western boundary adjoins the South Sydney Freight Line a key rail freight route for the movement of freight to and from Port Botany.

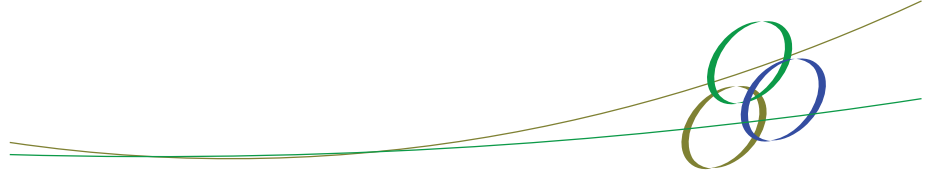
The SIMTA Moorebank Intermodal access corridor to the Southern Sydney Freight Line is proposed to be through the Glenfield Waste Service's northern parcel of land. The site could have the ability to access any future rail link located on the northern parcel of land.

While the site is not identified in the Employment Lands map Figure E2, as illustrated in Appendix 19 as part of the existing or proposed employment lands, the site neighbours the proposed employment lands identified for the Moorebank Intermodal Terminal Project and the SIMTA Moorebank Intermodal project. Both projects are part of the Moorebank to Prestons and Minto significant freight industry cluster.

The rezoning of the majority of the site to the SILEP IN1 Industrial zone will allow the site to be integrated into the freight cluster and contribute to the full development of the Moorebank to Prestons and Minto significant freight industry cluster.

F. Balancing Land Uses on the City Fringe

Sydney's urban footprint in 2010 indicative map Figure F1 seems to identify the site as being rural and resource lands. The strategy's objective is to identify and protect major agricultural and resource lands. Sydney's urban footprint in 2010 indicative map Figure F1 has been included as Appendix 20.



The site does not contribute to any agricultural industries in the western area of Sydney and therefore is not classified as major agricultural land.

The site and the South West Sub Region are located within AGL's Upstream Investments Pty Limited Petroleum Exploration License (PEL) 2.

The site is not located in an identified mineral resource area and is not identified in any planning instrument as having any regionally significant extractive resources. Therefore the site should not be classified as major resource land.

The site is located within the Liverpool–Campbelltown–Macarthur and Liverpool–Leppington key transport corridors. Rezoning the site for employment lands will assist in providing employment opportunities within the current Liverpool–Campbelltown–Macarthur urban footprint and containing Sydney's overall footprint.

G. Tackling Climate Change and Protecting Sydney's Natural Environment

The site's location on the Liverpool to Campbelltown–Macarthur multimodal transport corridor and within 1.0km of the Glenfield rail station provides the opportunity for a large portion of the site's future workforce to use public transport to access the site and consequently decrease private vehicle carbon emissions, a major contributor to climate change.

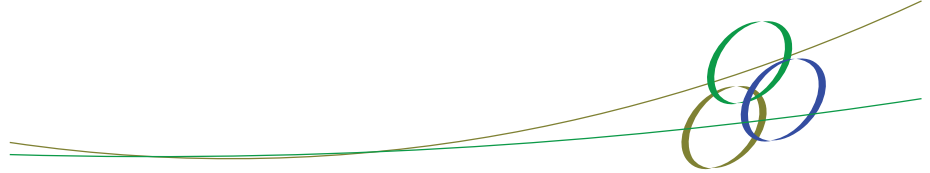
This strategy seeks to implement the NSW Biodiversity Strategy to protect identified priority conservation areas. At a regional scale, priority conservation lands have been identified for Western Sydney in the Cumberland Plain Recovery Plan.

The mapping at a regional scale includes the site. The LGA level mapping identifies the majority of the Shale Plain Woodland as including native vegetation understorey and therefore being of a higher quality example of the community.

The EPS ecological report (May 2013) reveals that the Shale Plain Woodland on the site is in low condition that supports some habitat attributes for fauna of low conservation significance. The woodland is an isolated patch of vegetation that is unlikely to be an integral component of biodiversity within the Campbelltown LGA. The EPS ecological report has been included as Appendix 17 and the report's findings will be discussed in subsection 1.1.8.

The rezoning of the majority of the site for employment lands and subsequent development will not adversely impact any significant Shale Plain Woodland.

The proposed SILEP RE1 Public Recreation zone combined with the Campbelltown SILEP NRM model Riparian land and waterways provision will provide protection for the site's riparian land.



Draft South West Subregional Strategy

The 2007 draft South West Subregional Strategy 2031 translates the objectives of the NSW Government's Metropolitan Strategy 2036 and State Plan to the local level. The draft South West Subregional Strategy 2031 will guide land use planning until 2031 in the Camden, Campbelltown, Liverpool and Wollondilly local government areas. The draft South West Subregional Strategy 2031 acts as a broad framework for the long term development of the area, guiding government investment and linking local and state planning issues. The plan covers seven strategic directions including:

- A. Economy and Employment;
- B. Centres and Corridors;
- C. Housing;
- D. Transport;
- E. Environment, Heritage and Resources;
- F. Parks Public Places and Culture; and
- G. Implementation and Governance.

The strategies relevant to the site are A, B, D and E.

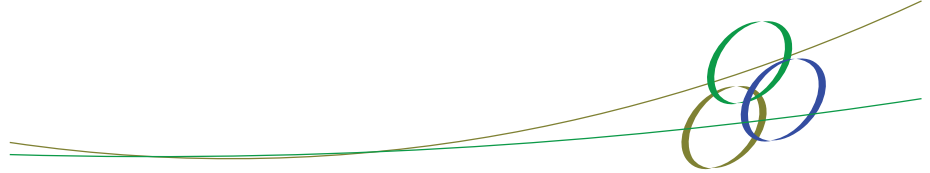
A. Economy and Employment

The strategy states that South West council's must prepare Principal LEPs with sufficient zoned employment lands to meet their employment capacity targets.

The South West Subregion to 2031 employment capacity targets, in Table 4 of the strategy identifies the Campbelltown's employment capacity target rate at 26,000 or 31% and Liverpool's employment capacity target rate at 35,000 or 39% of the South West Subregion to 2031 employment target.

The strategy finds Campbelltown has approximately 741 hectares of employment lands. The strategy does not identify the hectares required to meeting Campbelltown's 2031 employment capacity target.

Based on current take up rates in the Campbelltown LGA Campbelltown's 2011 Employment Lands Review Report recommends establishing a target of 1,000 hectares of general industrial (SILEP IN1 General Industrial or IN2 Light Industrial), to meet their 2031-2036 employment targets. Therefore a further 259 hectares of employment lands is required to meet Campbelltown's employment targets.



The strategy indicates the available Campbelltown LGA employment lands are under threat. A substantial area of land west of the Blaxland Road, Campbelltown was rezoned to permit residential development in 1994. In addition the inclusion of bulky goods as permissible uses in Campbelltown 4(b) and 4(c) zones has led to the withdrawal of high quality and well located industrial land from the stock of employment Lands. Between 1987 and 2006 66.6 hectares of Campbelltown's LGA employment land had been lost.

The strategy identifies the Glenfield Waste Centre, Cambridge Avenue as possibly providing employment Land for light manufacturing, local industry and urban services. The Campbelltown's 2011 Employment Lands Review Report supports this strategic outcome and recommends the site as a potential future employment industrial area that could provide some of the additional land required for forecasted employment lands.

The SIMTA land is identified in the strategy as a South West strategic employment area. The SIMTA Intermodal development will access the South Sydney Freight Line through the Glenfield Waste Site's northern parcel of land. The site could have the ability to access any future rail link located on the northern parcel of land.

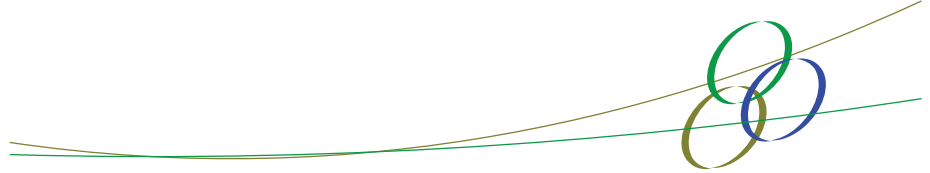
One of the strategic recommendations is that NSW Government and Campbelltown City Council determine appropriate zonings to encourage high employment generating developments to locate in industrial zones within walking distance of train stations, and freight oriented activities utilising improved rail infrastructure along the Main South Line.

The site is located within walking distance of the Glenfield rail station and the Liverpool –Campbelltown strategic bus corridor (Corridor 31) and could have the ability to access any future rail link located on the northern parcel of land. Therefore the proposed rezoning of the majority of the site to the SILEP IN1 Industrial zone will allow the site to support the Main South Line freight oriented activities and network of intermodal freight terminals.

D. Transport

On an average weekday, 79% of trips by South West residents are made by private vehicle, 8.1% by public transport and 12.3% by walking or cycling. This subregion has the lowest proportion of walking and cycling trips and the highest proportion of private vehicle trips. Associated with the private vehicle trips is less than 45% of all workers in the South West Subregion live and work within the subregion.

The site's inclusion in the Moorebank to Prestons and Minto significant freight industry cluster and its location within the Liverpool to Campbelltown-Macarthur multimodal transport corridor makes the site suitable for employment lands.



The rezoning of the site for employment lands would assist in potentially decreasing the private vehicle trips undertaken by South West Subregion residence for their employment and potentially increase the number of people in the South West Subregion who would use public transport to travel to their work location.

E. Environment, Heritage and Resources

Riparian lands:

The proposed SILEP RE1 Public Recreation zone combined with the Campbelltown SILEP NRM model Riparian Land and Waterways provision will provide protection for the site's riparian land.

Sydney's unique plants and biodiversity:

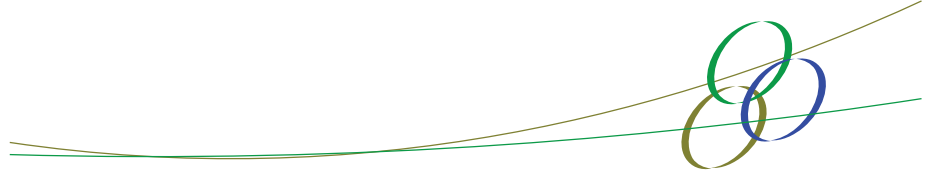
The vegetation of the Campbelltown LGA was described by Benson and Howell (1990) as a mix of rugged Hawkesbury Sandstone country and rolling hills of woodlands of Grey Box *Eucalyptus moluccana*, Forest Red Gum *Eucalyptus tereticornis*, and Narrow-leaved Ironbark *Eucalyptus crebra*, on the clay soils of the Wianamatta Shale.

The vegetation communities of the Cumberland Plain were mapped by NPWS (2002) at a scale of 1:25000 using aerial photograph interpretation and limited ground survey. Two vegetation communities were mapped on the Glenfield Waste Service's site, in particular, Shale Plains Woodland and Riparian Forest. The dominant overstorey species were *Eucalyptus moluccana*, *E. botryoides* and *E. botryoides/saligna* hybrid. The understorey vegetation was predominantly comprised of exotic grass and weeds.

The EPS ecological report (May 2013) indicates the Shale Plain Woodland on the site is in low condition that supports some habitat attributes for fauna of low conservation significance. The woodland is an isolated patch of vegetation that is unlikely to be an integral component of biodiversity within the Campbelltown LGA and not of a higher quality and therefore if removed would be a small loss to the LGA's ecological community. The EPS report has been included as Appendix 17 and the report's findings will be discussed in subsection 1.1.8.

The Campbelltown City Council, as a responsible authority for implementing, the Cumberland Plain Recovery Plan, has not identified the site as part of its adopted Cumberland Plain Recovery Plan (Appendix 21).

The rezoning of the majority of the site for employment lands and subsequent development will not adversely impact any significant plants and biodiversity.



AHMS has prepared an Aboriginal cultural heritage assessment report for the rezoning which is included as Appendix 22. The report concludes there are no Aboriginal heritage issues that indicate that the rezoning of the site from rural to industrial should not proceed. The report's recommendations are discussed in subsection 1.1.9.

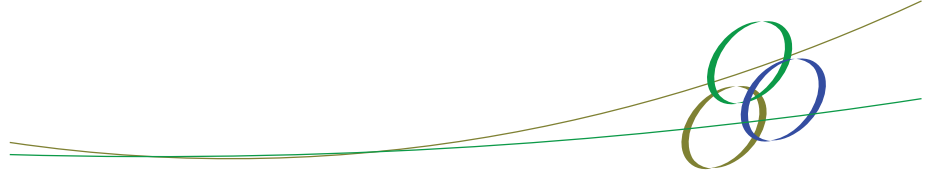
MACROC Employment Prospects for South West Sydney 2008

MACROC is the association of the three local government authorities in the Macarthur region - Camden Council, Campbelltown City Council and Wollondilly Shire Council.

The MACROC commissioned report "Employment Prospects for South West Sydney" takes a regional view of employment and business growth in the context of the State Government's Metropolitan Strategy, the South West Growth Centre and the Draft South West Sydney Sub-Regional Strategy, as well as taking into account the visions and aspirations of the Local Government Areas of the South West i.e. Camden, Campbelltown, Liverpool and Wollondilly.

The report challenges some of the Draft South West Subregional strategy's outcomes and provides alternative conclusions on a number of issues including:

- On a Sydney subregional basis the forecast distribution of jobs suggests a rising concentration of employment in the North West, Lower North and Sydney City in comparison to resident population, benefiting from the growth and affluence;
- By contrast, the South West will host 23% of population growth but only 13% of growth in local employment. If realised, the ratio of local employment will fall from 0.304 jobs per capita to 0.286 and will become a major impediment for the vitality of the Subregion that is already burdened by longer work travel times. Over the same period the Greater Metropolitan Area (GMA) ratio will strengthen from 0.474 to 0.485 taking the South West to the lowest ratio in the GMA despite it having significant natural advantages for employment growth;
- Although the South West has a high job containment level of 71% (local jobs being taken by local residents), the current excess workforce in the Subregion means that 56% of the resident workforce has to leave the south to find work;
- The forecasts employment growth in the GMA was 30%, yet only 16% (73,000 jobs on the NSW Government's Transport Data Centre (TDC) estimates or 89,000 from the DOP&I) of that growth found its way into the forecast employment for the South West despite the Subregion experiencing a forecast population of 23.9%. If jobs were to follow population growth there would be an increase of 132,000 jobs in the South West;
- The authors noted that a combination of factors would not result in an increase of 132,000. Based on a set of assumptions the authors forecast an increase of 106,838 for the South West to 2031 instead of the South West Subregional strategy forecast of 89,000. This is an increase of 17,838; and



- Reviewing the various sectors the report concluded industrial floor space requirements will increase from 2,672,630sqm in 2001 to 3,988,550sqm in 2031.

The key point from the MACROC report is the local employment growth will be insufficient to cater for the expected population growth and more needs to be done to prevent this possible outcome.

The site's inclusion in the Moorebank to Prestons and Minto significant freight industry cluster and its location within the Liverpool to Campbelltown-Macarthur multimodal transport corridor makes the site suitable for rezoning for employment lands. The addition of the industrial zoned site to the Campbelltown's employment lands will assist to provide some of the employment land and jobs required to cater for the projected local and area population growth.

1.1.5 Is the proposed rezoning of land consistent with local Councils Community Strategic Plan, or other local strategic plan?

Campbelltown 2025 Looking Forward

The 2004 Campbelltown 2025 Strategy (strategy) is a statement of broad town planning intent for the longer term future of the City of Campbelltown.

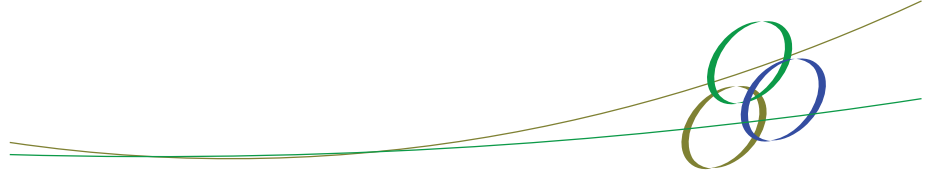
The strategy is the basis for a more detailed and comprehensive town planning strategy for Campbelltown. Importantly, the comprehensive town planning strategy will build on the desired outcomes included in strategy, giving specific attention to the focus areas.

The strategy establishes a set of strategic directions. The relevant strategic directions for the site include protecting and enhancing the city's key environmental assets and creating education, employment and entrepreneurial opportunities.

Protecting and Enhancing the City's Key Environmental Assets

The site is located on the Georges River. The owners of the land support the protection of riparian land. The Georges River riparian land will be protected by the provisions in the Campbelltown SILEP including the SILEP NRM Riparian Land and Waterways clause that will apply to the Georges River water system including land within 40 metres of the top of the bank of the Georges River.

In addition the majority of the land adjoining the Georges River currently Zone 6(b) Regional Open Space under the Campbelltown (Urban Area) Local Environmental Plan 2002 will be Zone RE1 Public Recreation which will limit the range of land use activities.



The Campbelltown City Council, as a responsible authority for implementing, the Cumberland Plain Recovery Plan, has not identified the site as part of its adopted Cumberland Plain Recovery Plan.

The rezoning of the majority of the site for employment lands and subsequent development will not adversely impact the Georges River riparian land or any significant environmental areas.

Creating Education, Employment and Entrepreneurial Opportunities

The rezoning of the majority of the site to zone IN1 General Industrial under the Campbelltown City Council's SILEP will assist in alleviating the critical shortage in available zoned employment lands and assist in increasing Campbelltown's LGA employment self-sufficiency.

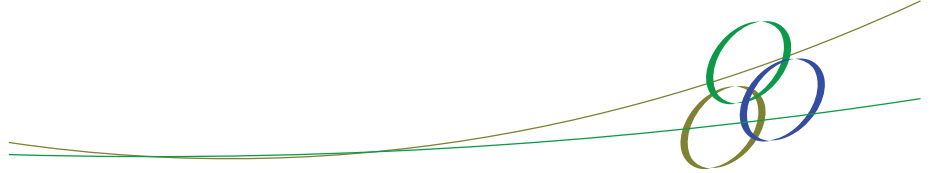
Draft Campbelltown Employment Lands Review Report 2011

In June 2010 Council appointed the specialist consulting firms Strategic Economics and Cox Richardson to undertake a review of employment lands within the Campbelltown LGA to help inform the preparation of the Council's new principal SILEP.

While the draft report is not publicly available a detailed Planning and Environment Committee paper on the report was prepared and submitted to Council's meeting on the 31 May 2011. The draft report is included as Appendix 9.

The key strategic findings of the employment lands report were:

- Campbelltown LGA currently has 741 hectares of zoned employment lands (located in the Ingleburn, Minto, Campbelltown and Leumeah industrial areas);
- The majority of the employment lands in Campbelltown LGA are occupied. At the time of the report there was approximately 30 hectares of vacant land, located mainly around the Minto industrial area;
- Approximately 33% of the Campbelltown LGA's resident labour force is employed within the LGA, and 66% of this labour force commutes to other areas for work;
- There will be a significant increase in the local job deficit from 60,000 to almost 150,000 by 2036;
- Campbelltown LGA has recently experienced solid employment growth in industries linked to employment lands and specifically in manufacturing and transport & storage;
- Given the current take up rates and location advantages such as the proximity to major transport corridors, it is estimated the Campbelltown LGA will require approximately 10 hectares of additional land for employment purposes per annum up to 2036 (which equates to approximately 250 hectares of new land zoned for industrial purposes); and
- The development of a major intermodal facility along the south west corridor, such as that being proposed at Moorebank, will further increase demand for freight related development.



The key recommendations of the employment lands report were:

- Previous studies have identified two potential major sites – the Glenlee Coal Washery site and the Glenfield Waste Disposal site. Both sites have advantages but face infrastructure challenges. In addition both sites have regional significance and the NSW Government and adjoining councils should be involved in the planning and development of these sites; and
- Council should consider commencing negotiations with Liverpool City Council regarding the rezoning of the Glenfield Disposal site for employment purposes.

The Draft Campbelltown Employment Lands Review Report 2011 strategic findings and recommendations clearly indicate the majority of the site should be zoned for employment lands and based on the information in section 5 the SILEP IN1 General Industrial zone is the most appropriate zone.

1.1.6 Is the rezoning submission consistent with applicable State Environmental Planning Policies?

The following State Environmental Planning Policies (SEPP) are applicable.

SEPP No 19 – Bushland in Urban Areas

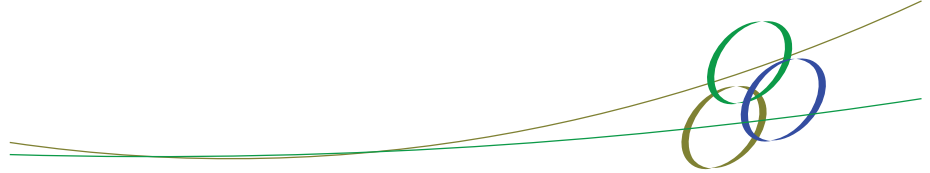
SEPP 19 requires that consent from council is obtained prior to any bushland be disturbed on land zoned or reserved for public open space purposes. It also provides additional matters for consideration and that a draft LEP must have regard to the SEPP and give priority to retaining native bushland.

The majority of the land adjoining the Georges River currently zoned 6(b) Regional Open Space under the Campbelltown (Urban Area) Local Environmental Plan 2002 will be zoned the SILEP RE1 Public Recreation zone which will limit the range of land use activities to public recreation activities.

The SILEP RE1 Public Recreation zone will continue the existing protection provided under SEPP 19.

SEPP No 44 – Koala Habitat Protection

The SEPP encourages the conservation and management of natural vegetation areas that provide habitat for koalas to ensure permanent free-living populations will be maintained over their present range.



The EPS ecological report reveals that less than 5% of the trees that occur within the site are koala feed trees listed in schedule 2 SEPP No 44. In particular, the site is dominated by *Eucalyptus moluccana* Grey Box with few individuals of *Eucalyptus tereticornis* Forest Red Gum, a Koala feed tree present. This indicates that the site does not support potential koala habitat. The report has been included as Appendix 17.

SEPP No 55 - Remediation of Land

The site comprises land filled areas and virgin land or unfilled land.

The SEPP makes remediation of contaminated land permissible, defines when consent is required, requires all remediation to comply with standards, ensures land is investigated if contamination is suspected, and requires councils to be notified of all remediation proposals.

Clause 6 of the SEPP requires that contamination and remediation should be considered in a rezoning proposal.

Under Clause 7 of the SEPP before Council includes land, used for activities identified in table 1 in the contaminated land planning guidelines, in a particular zone Council must have regard to a preliminary investigation of the land carried out in accordance with the contaminated land planning guidelines. Table 1 includes land fill sites.

The geotechnical and contamination rezoning report prepared by Consulting Earth Scientists (CES) concludes the site is suitable for rezoning for industrial purposes. The geotechnical and contamination report has been included as Appendix 23.

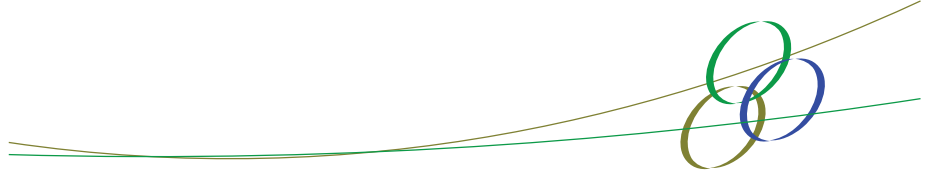
Based on the CES report the site is suitable to be rezoned to permit industrial land uses under the SEPP.

SEPP (Infrastructure) - 2007

The SEPP provides a consistent planning regime for infrastructure and the provision of services across NSW.

As discussed in section 3 the establishment and operation of a waste recycling facility is proposed in the short to medium term.

Division 23 "Waste or resource management facilities" of the State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) details the permissible uses for certain land.



The SILEP IN1 General Industrial zone is a prescribed zone in ISEPP Division 23 “Waste or resource management facilities” and therefore is a suitable zone for the protection of the site’s current and future “Waste or resource management facilities” land use activities.

Not only does the ISEPP provide a planning regime for the provision of infrastructure and services it also provides for the protection of ISEPP infrastructure.

State Significant Rail infrastructure in the form of the East Hills Rail Line and the South West Rail Link’s “*Glenfield Southern junction flyover*” are located within the boundaries of the site. The ISEPP Division 15 – Railways - specifies development controls for noise and vibration, setbacks from rail infrastructure, excavation and states that any guidelines issued by the Director General of the DOP&I must be taken into account for development under clauses 85-87.

The development controls and guidelines are designed to mitigate the health impacts of rail activity on sensitive development such as housing, educational establishments, hospitals, seniors housing and places of worship. If the site is zoned IN1 General Industrial zone all of the sensitive developments will be prohibited in the zone and therefore any potential land use conflict or adverse health impacts avoided.

The IN1 General Industrial zone is a prescribed zone under ISEPP Division 15 - Railways. The zoning of the site IN1 General Industrial zone will not only protect the State Significant Rail infrastructure located on the site, by removing the possibility of any sensitive development being located adjacent to the rail infrastructure, but will also allow any development on the site as prescribed under Division 15.

SEPP (Mining, Petroleum Production and Extractive Industries) 2007

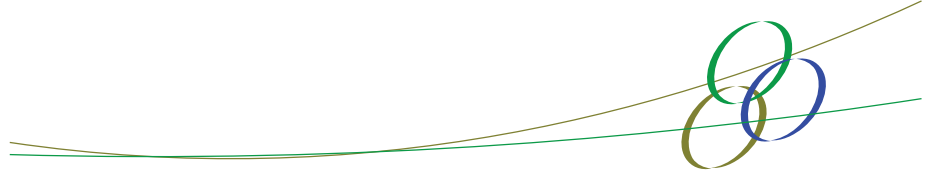
The site is not located in an identified mineral resource area and is not identified in any planning instrument as having any regionally significant extractive resources.

The site and the South West Sub Region are located within AGL’s Upstream Investments Pty Limited Petroleum Exploration License (PEL) 2.

The rezoning of the site from a rural zone to an industrial zone maintains the existing provisions of the SEPP and therefore is consistent with the provisions of the SEPP.

SEPP 2008 Rural Lands

The Rural Lands SEPP was introduced to provide a strategic approach to rural land use planning across NSW Councils and to manage land-use conflicts.



The majority of the site is currently Zone 1(a) – Rural A Zone under the Campbelltown (Urban area) Local Environmental Plan 2002. The main objective of the zone is to identify land that constraints make unsuitable for urban use so that it can be put to long-term agricultural use. The site is unsuitable for long-term agricultural use for the following reasons:

- The site is not located in a primary production area or part of an agricultural land use area;
- The site is located in an urban area. There are residential land uses located to the west and south of the site with two large industrial developments proposed to the north east of the site; and
- The landfilled section of the site is not suitable for any agricultural land use and the virgin land available for agricultural production is not a large enough area to sustain a commercially viable primary production business.

Based on the current and future role and function of the site and the surrounding current and future land uses the site is not suitable for any future rural land uses and therefore the provisions of the SEPP are not applicable to the site.

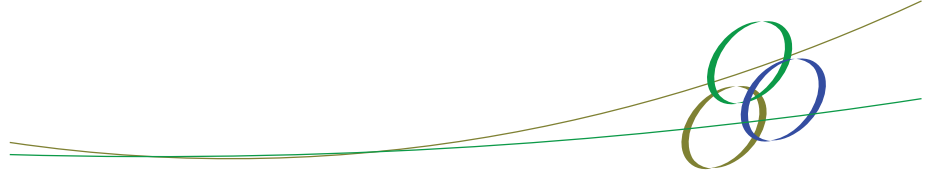
SEPP 2006 Sydney Region Growth Centres

The SEPP provides for the coordinated release of land for residential, employment and other urban development in the North West and South West Growth Centres of the Sydney Region (in conjunction with Environmental Planning and Assessment Regulation relating to precinct planning).

The planned South West Rail Link will connect the South West Growth Centre to the existing rail network at Glenfield, providing direct and frequent rail services to Liverpool, the Sydney CBD and the Global Economic Corridor.

The connection to the existing rail network at Glenfield will reinforce the role of this station as an important transport interchange in the South West Subregion, facilitating transfers between services on the East Hills Line, the Main Line and the Cumberland Line.

The site's proximity to the South West Growth Centre, location in the Liverpool to Campbelltown-Macarthur multimodal transport corridor and within 1.0 km from the Glenfield Rail Station will contribute to the sustainable development of the South West Growth Centre by providing jobs in the South West area thereby increasing the South West Subregion's employment self-sufficiency.



Sydney Regional Environmental Plan No 9—Extractive Industry (No 2—1995)

The deemed SEPP aims to facilitate the development of extractive resources that are in close proximity to the Sydney Metropolitan Area by identifying land which contains extractive materials of regional significance and ensuring that land is not developed for purposes that are incompatible with the extraction of that material.

The site is not identified in the SEPP as having regional significance extractive materials.

Greater Metropolitan Regional Environmental Plan No 2—Georges River Catchment

The aims of the Georges River deemed SEPP are to manage the natural resources of the Georges River Catchment and specifically to protect the water quality of the Georges River and its tributaries and the environmental quality of the whole catchment.

Part 2 sets out the general and specific planning principles that council needs to consider when preparing a local environmental plan. The Campbelltown SILEP will take into account and apply the relevant planning principles by:

- Zoning the majority of the site's Georges River riparian land the SILEP RE1 Public Recreation zone;
- Including in the Campbelltown SILEP relevant SILEP NRM local provisions including provisions relating to Biodiversity (Terrestrial), Groundwater vulnerability, Riparian Land and Waterways, Stormwater Management and Flooding; and
- Including SILEP NRM mapping that will link to the NRM local provisions. The NRM maps will identify the land in the Campbelltown LGA that is subject to the NRM local provisions.

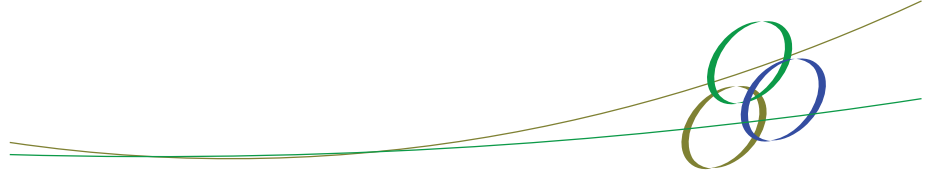
The application of the RE1 Public Recreation zone to the site's Georges River riparian land and the inclusion of relevant SILEP NRM local provisions will provide the required protection for the Georges River water quality.

1.1.7 Is the rezoning consistent with applicable Ministerial Directions (s.117 directions)?

The following s117 Directions are applicable.

1.1 Business and Industrial Zones

The direction applies because the submission proposes rezoning part of the site to the SILEP Zone IN1 General Industrial zone.



The proposed rezoning is consistent with the Direction for the following reasons:

- The site will provide employment opportunities close to Glenfield rail station, an important transport interchange in the South West Subregion, facilitating transfers between services on the East Hills Line, the Main Southern Line, the Cumberland Line and Leppington Line;
- Liverpool is identified in the South West Subregion as the South West's Regional City. Approximately 56% of the South West residents commute to other areas for work. The site will provide employment opportunities which will support the viability of Liverpool as the nominated Regional City by decreasing the number of people required to leave the South West area for work;
- The site will provide a significant part of the 250 hectares of new industrial land required by Campbelltown City Council for 2031- 2036;
- The 2010 Metropolitan Plan for Sydney 2036 Strategy E "Growing Sydney Economy" identifies the site as part of the the Moorebank to Prestons and Minto significant freight industry cluster. Consequently the rezoning of the site to an industrial zone is consistent with the Metropolitan strategy, approved by the Director General of the Department of Planning & Infrastructure (DOP&I); and
- The 2007 draft South West Subregional Strategy 2031 Strategy A "Economy and Employment" identifies the Glenfield Waste Centre, Cambridge Avenue as possibly providing employment land for light manufacturing, local industry and urban services. Therefore the rezoning of the site to an industrial zone is consistent with the draft South West Subregional strategy, approved by the Director General of the DOP&I.

The rezoning of the majority of the site to employment lands is consistent with this direction.

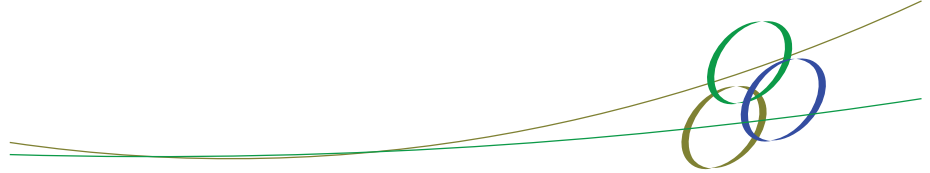
1.2 Rural Zones

The direction applies because the submission proposes to rezone part of the site currently Zone 1(a) – Rural A Zone under the Campbelltown (Urban Area) Local Environmental Plan 2002 to SILEP IN1 General Industrial.

The proposed rezoning is inconsistent with the Direction because it rezones land from a rural zone to an industrial zone.

The inconsistency with the Direction is justified by the following DOP&I Director-General approved strategies:

- The 2010 Metropolitan Plan for Sydney 2036 identifies the site as part of the the Moorebank to Prestons and Minto significant freight industry cluster; and
- The 2007 draft South West Subregional Strategy 2031 identifies the Glenfield Waste Site as possibly providing employment land for light manufacturing, local industry and urban services.



The rezoning's inconsistency with this direction is justified by the Metropolitan Plan for Sydney 2036 strategy and the draft South West Subregional Strategy 2031 strategy.

We request the Director General's delegate approve the inconsistency.

1.3 Mining, Petroleum Production and Extractive Industries

This direction applies when a rezoning would have the effect of:

- Prohibiting the mining of coal or other minerals, production of petroleum, or winning or obtaining of extractive materials; or
- Restricting the potential development of resources of coal, other minerals, petroleum or extractive materials which are of State or Regional significance by permitting a land use that is likely to be incompatible with such development.

The rezoning of part of the site to the IN1 General Industrial zone will preserve the current permissibility of mining, petroleum production and extractive industries under SEPP (Mining, Petroleum Production and Extractive Industries) 2007.

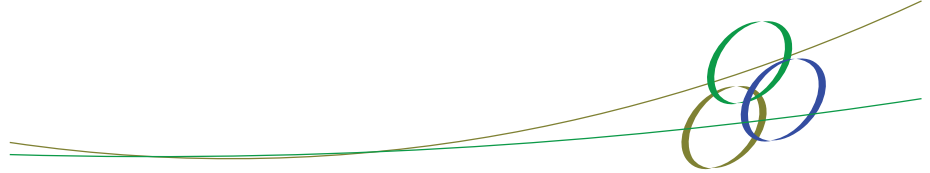
The site and the South West Sub Region are located within AGL's Upstream Investments Pty Limited Petroleum Exploration License (PEL) 2.

The land is not located in an identified mineral resource area.

The rezoning is consistent with this direction.

1.5 Rural Lands

The direction applies because the submission proposes to rezone part of the site, currently Zone 1(a) – Rural A Zone under the Campbelltown (Urban Area) Local Environmental Plan 2002, to IN1 General Industrial zone.



The rezoning is consistent with the Rural Planning Principles listed in SEPP (Rural Lands) 2008 and therefore consistent with this Direction because:

- The 28 hectares available for primary production use is not a commercially viable area for a primary production business and therefore the site has no agricultural production value to protect;
- The site is located in an urban area and not in a primary production or agriculture area i.e. there are residential areas located to the west and south of the site and two large industrial developments will be located to the north east of the site;
- The 2010 Metropolitan Plan for Sydney 2036 identifies the site as part of the the Moorebank to Prestons and Minto significant freight industry cluster;
- The 2007 draft South West Subregional Strategy 2031 identifies the Glenfield Waste Site as possibly providing employment land for light manufacturing, local industry and urban services; and
- The rezoning of part of the site for employment lands will contribute to meeting the future employment land requirements for the South West region and for the Campbelltown LGA.

The rezoning is consistent with this direction.

2.1 Environmental Protection Zones

The direction applies because the rezoning applies to a strip of riparian land on the Georges River that requires environmental protection.

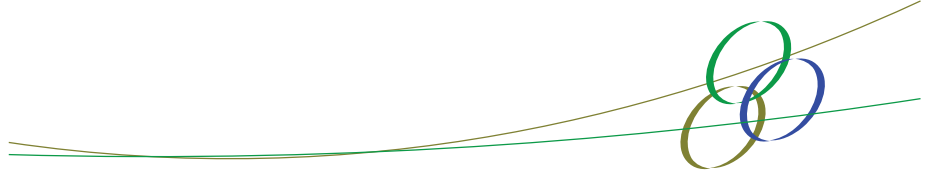
The rezoning of the strip of riparian land is consistent with the direction because:

- The rezoning will not reduce the current environmental protection for this land i.e. the majority of land currently Zone 6(b) Regional Open Space will be zoned the SILEP equivalent RE1 Public Recreation zone; and
- The Campbelltown SILEP will insert relevant SILEP NRM local provisions that will protect this land.

The rezoning is consistent with this direction.

3.4 Integrating Land Use and Transport

The direction applies because the submission proposes to rezone part of the site to the SILEP Zone IN1 General Industrial.



The proposed rezoning is consistent with principles of *Improving Transport Choice – Guidelines for planning and development* (DUAP 2001), and *The Right Place for Business and Services – Planning Policy* (DUAP 2001) and therefore with the Direction for the following reasons:

- The site is approximately 1.0km from the Glenfield rail station. The station will be the transport interchange in the South West Subregion, facilitating transfers between services on the East Hills Line, the Main South Line and the Cumberland Line;
- The site will adjoin the Liverpool – Campbelltown bus corridor (Corridor 31) identified in the South West Subregion Strategy as a strategic bus corridor;
- The 2010 Metropolitan Plan for Sydney 2036 identifies the site as part of the Moorebank to Prestons and Minto significant freight industry cluster;
- The land will border the Moorebank Intermodal Terminal Project and the Moorebank Sydney Intermodal Terminal Alliance's (SIMTA) intermodal terminal facility which are part of the Moorebank to Prestons and Minto significant freight industry cluster;
- The 2007 draft South West Subregional Strategy 2031 identifies the Glenfield Waste Site, Cambridge Avenue as possibly providing employment land for light manufacturing, local industry and urban services; and
- The rezoning of part of the site for employment lands will contribute to meeting the future employment land requirements for the South West region and for the Campbelltown LGA.

The rezoning is consistent with this direction.

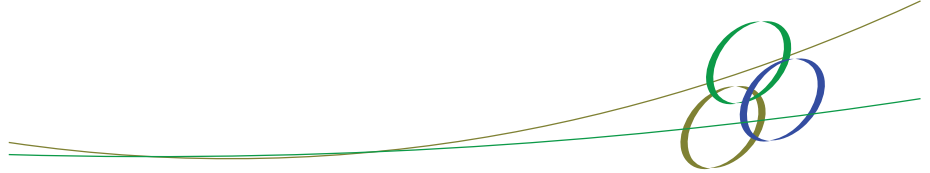
4.3 Flood Prone Land

The direction applies because the submission proposes to rezone part of the site from a rural zone to and industrial zone that is flood prone land. The rezoning is inconsistent with the Direction because it is proposing to rezone land from a rural zone to an industrial zone.

Flood prone land is land susceptible to flooding by the probable maximum flood (PMF) event. The PMF is the largest flood that could conceivably occur at a particular location usually estimated from probable maximum precipitation coupled with the worst flood producing catchment conditions.

Generally it is not physically or economically possible to provide complete protection against a PMF event. The Flood Plan Level for industrial development is usually the equivalent of the 1 in 100 year Average Recurrence Interval flood level plus freeboard.

Campbelltown City Council current flood studies do not include the site. The most detailed flood study that includes the site is the Upper Georges River Flood study prepared by the Department of Land & Water Conservation in conjunction with the Liverpool City Council in December 2000 The Upper Georges River Flood Study has be included as Appendix 24.



Hard and Forester surveyors have reproduced the study's flood levels for the site onto a topographic map of the site to show the area impacted in a 1 in 100 year flood as illustrated in Appendix 16.

The preliminary survey map shows that with the exception of the riparian corridor and a small area adjacent to Cambridge Avenue at the south eastern corner of the site, the site is not subject to a 1 in 100 year flood. Any development of the site will take into consideration the 1 in 100 year flood.

The proposed rezoning's inconsistency with the Direction can be justified as minor significance for the following reasons:

- The flood levels for the site have been determined by a comprehensive flood study;
- The majority of the site is not susceptible to a 1 in 100 year flood event; and
- The 1 in 100 year flood event will not prevent development of the site.

We request the Director General's delegate approve the inconsistency as minor significance.

4.4 Planning for Bushfire Protection

The direction applies because the submission proposes to rezone land that is in proximity to land mapped as bushfire prone land.

The bush fire prone map identifies the site's riparian land as having category 1 vegetation and 12 hectares of land south of Cambridge Avenue being part Lot 3 in DP 736881 affected by an easement for transmission lines owned by the Electricity Transmission Authority as having Category 2 vegetation; as illustrated in Appendix 18. There is little or no development proposed for this area of land.

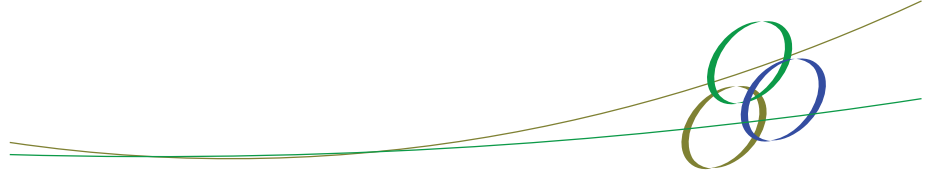
Any development of the site will comply with the current bushfire protection measures specified by the *Planning for Bushfire Protection Guidelines 2006*.

Campbelltown City Council will consult with state government agencies including the NSW Rural Fire Service authority as part of its SILEP exhibition

Subject to Campbelltown City Council consulting with the NSW Rural Fire Service authority as part of the SILEP exhibition the rezoning is consistent with this direction.

6.2 Reserving Land for Public Purposes

The direction applies because the submission proposes to create a zone for the purpose of reserving land for a public purpose.



The rezoning relates to a strip of land on the eastern boundary with the Georges River currently Zone 6(b) Regional Open Space under the Campbelltown (Urban Area) Local Environmental Plan 2002. The submission proposes the application of the SILEP RE1 Public Recreation equivalent zone to the majority of the land.

In accordance with the Direction the submission requests the Campbelltown City Council to approve the rezoning and seek approval from the DOP&I's Director General or delegate.

The rezoning is consistent with this direction subject to Campbelltown City Council and the DOP&I's Director General approving the rezoning.

7.1 Implementation of the Metropolitan Plan for Sydney 2036

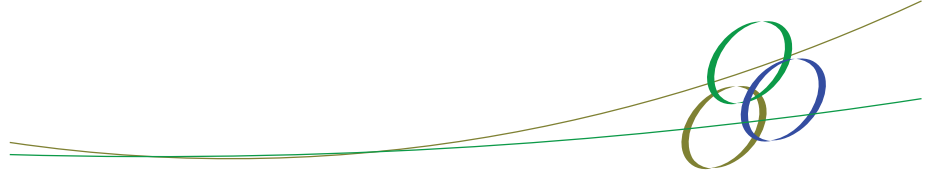
The rezoning of part of the site currently Zone 1(a) – Rural A Zone under the Campbelltown (Urban Area) Local Environmental Plan 2002 to the SILEP Zone IN1 General Industrial is consistent with the NSW Government's Plan for Sydney 2036 for the following reasons:

- The 2010 Metropolitan Plan for Sydney 2036 identifies the site as part of the the Moorebank to Prestons and Minto significant freight industry cluster;
- The land will border the Moorebank Intermodal Terminal (IMT) Project and the Moorebank Sydney Intermodal Terminal Alliance's (SIMTA) intermodal terminal facility which are identified as part of the Moorebank to Prestons and Minto significant freight industry cluster;
- The rezoning of the majority of the site to an industrial zone will permit land uses such as warehousing and logistics which could contribute to the full development of the Moorebank to Prestons and Minto significant freight industry cluster; and
- The 2007 draft South West Subregional Strategy 2031 identifies the Glenfield Waste Centre, Cambridge Road as possibly providing employment land for light manufacturing, local industry and urban services.

The rezoning of the majority of the land currently Zone 6(b) Regional Open Space under the Campbelltown (Urban Area) Local Environmental Plan 2002 to the SILEP Zone RE1 Public Recreation is consistent with the NSW Government's Plan for Sydney 2036 for the following reason;

- The RE1 Public Recreation zone will protect the Georges River riparian land by limiting the land use activities to low impact recreational activities and development.

The rezoning is consistent with this direction.



6.3 Environmental, Social and Economic Impact

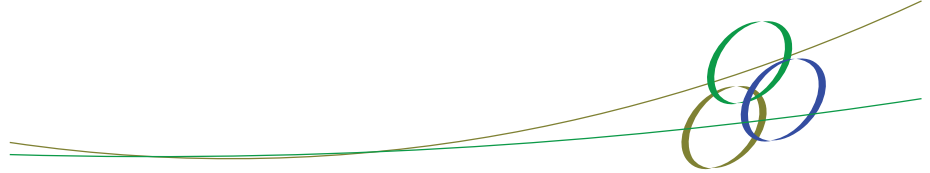
1.1.8 Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the rezoning?

Campbelltown City Council 149 (2) & (5) certificates dated the 20 April 2012 for Lot 91 in DP 1155962 and for Lot 3 in DP 736881, Part 2 (f) in both certificates state “*The land subject to this certificate does not include or comprise critical habitat*”. The 149 (2) & (5) certificates are included as Appendix 25.

As previously discussed the southern parcel of land has Shale Plain Woodland, a sub-unit of the Cumberland Plain Woodland that is listed as endangered under the *Threatened Species Conservation Act 1995*. Shale Plain Woodland is also listed as endangered under the *Environment Protection and Biodiversity Conservation Act 1999*.

The majority of the remnant Shale Plain Woodland that occurs on the site will need to be removed to enable development of the site. The findings of the EPS ecological report (May 2013) attached as Appendix 17 and other ecological studies undertaken on the site and adjacent area indicate the Shale Plain Woodland could be removed for the following reasons:

- The remnant Shale Plain Woodland is a relatively small isolated woodland patch that is a minor component of the ecology of the Campbelltown LGA;
- The woodland is subject to substantial isolation and fragmentation and its removal will not contribute to the further fragmentation of large or important patches of Cumberland Woodland;
- The woodland is essentially a monoculture of *Eucalyptus moluccana* of one age class and one stratum which was potentially likely to provide minimal habitat for threatened bird and bat species;
- No threatened frog, threatened waterbird, or threatened fish species were considered likely to have habitat within the subject site or occur on the subject site;
- The subject site supported a man-made dam which supported common waterbird species only;
- The woodland had been regularly mown, slashed and managed such that there was a paucity of leaf litter and fallen timber and as such, did not support understorey habitat for threatened species;
- While the future development will remove the remnant Shale Plain Woodland and adversely modify the soil profile in the area, any development will not significantly modify abiotic factors such that the soil profile groundwater levels of surface water drainage patterns necessary to the survival of remaining Cumberland Plain Woodland in the area will be significantly impacted;



- The proposed development does not involve actions that would significantly change the existing disturbance regime such as intensity or frequency of fires, the intensity or frequency floods, or routine clearing of vegetation; and
- Campbelltown City Council adopted the Cumberland Plain Recovery Plan at its meeting on the 31 May 2011 by resolution minute number 104. Council, as the responsible authority for the implementation of the recovery actions under the Cumberland Plain Recovery Plan identified four priority conservation areas at Macquarie Fields (93.2 ha), Kentlyn (93.4 ha), Mt Annan (40 ha) and Gilead (233.4 ha). The Council did not identify the site's remnant Shale Plain Woodland as a priority conservation area as identifies in Appendix 21.

The proposed rezoning of land will not adversely impact any critical habitat or threatened species, populations or ecological communities, or their habitats.

1.1.9 Are there any other likely environmental effects as a result of the rezoning submission and how are they proposed to be managed?

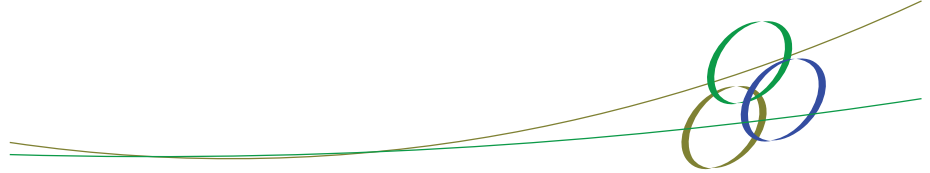
This assessment addresses the suitability of the site from a strategic level. The environmental matters that require consideration and how they are proposed to be managed are outlined below.

Visual Amenity

Any development will most likely be confined to the area of the site between Cambridge Avenue and the East Hills Rail Line.

The main viewing locations of any development on the site are identified in Appendix 26. The key visual amenity issues for each viewing location are:

- View locations 01 to 04 are from the Fergusson and Goodenough Street in Glenfield. The viewing distances to the sites boundary are between 150m to 180m (approx.) with intervening features including power lines and structures, traffic on Cambridge Avenue and a three metre bund and trees on the site's boundary;
- View locations 05 to 06 are from the residential area between Canterbury road and Railway Parade in Glenfield. The viewing distances to the site's boundary are between 170m to 180m (approx.) with intervening features including power lines and structures, traffic on Canterbury road, Cambridge Avenue and the Glenfield road and traffic on the Cambridge Avenue, Railway Parade roundabout;
- View locations 07 to 08 are from the Glenfield Road residential development as defined in the Campbelltown City Council Glenfield Road Area DCP 2002. The viewing distances to the site's boundary are between 160m to 190m (approx.) with intervening features including Glenfield Road traffic, a rail corridor and the Northern Flyover which will carry the new East Hills track over the existing South line;



- View locations 09 to 10 are from Slessor Road residential area Casula. The viewing distances to the site's boundary are between 320m to 350m (approx.) with intervening features including vegetation including trees, Throsby Park, a rail corridor and the Northern Flyover; and
- View locations 11 to 12 are from Leacocks Lane residential area Casula. The viewing distances to the sites boundary are between 590m to 700m (approx.) with intervening features including the northern portion of the site, topography, vegetation including trees, Leacock Regional Park, a rail corridor and the Southern and Northern Flyover.

The large viewing distances and intervening features to the site's boundary, appropriate building design and siting together with onsite measures to reduce visual impact of any development will ensure any potential adverse visual impact on the surrounding areas are minimised.

Acoustic Amenity

The residential distances from the site's boundary and the various intervening features will influence any noise from the site as illustrated in Appendix 26. In addition there is ambient noise from a range of sources including the East Hills Rail Line and the Main South Rail Line which may increase as a result of the Southern Sydney Freight Line and the South West Rail Link.

Future development applications for development on the site will assess acoustic impacts of the potential impacts of the construction and operation of any development.

Air Quality

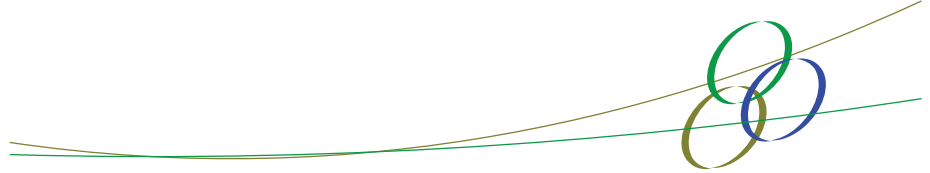
A development application for development on the site will include an air quality study that will assess the potential impacts of the development on the surrounding area. The study will address the requirements of the Office of Environment and Heritage.

Stormwater Management

The site has a large pervious surface area that allows the majority of the rain to infiltrate into the ground.

Any future development will increase the impervious surfaces areas e.g. roads, buildings, compacted soil that will increase the site's runoff.

A stormwater management system for any development on the site will be prepared having regard to the flood affectation on the site's boundary with the Georges River. Flood and Stormwater management will include assessment of hydrological impacts of the development, flood management and mitigation measures, water quality management, accident spill management measures and water cycle management.



Flood Prone Land

Campbelltown City Council current flood studies do not include the site. The most detailed flood study, that includes the site, is the Upper Georges River Flood study prepared by the Department of Land & Water Conservation in conjunction with the Liverpool City Council in December 2000. The Georges River Flood Study has been included as Appendix 24. The study was the first stage of the floodplain management process for the Upper Georges River and provided the basis for the future management of flood liable land within the study area with regard to flooding.

The study's modelling consisted of 40 cross sections that described the topography of the river. These sections are spaced at intervals of approximately 150 to 200m. The locations of cross sections are shown in the study's Figure 5. They have been numbered P1 to P42, and have also been assigned a chainage, with the upper cross section (P1) having an arbitrary chainage of 100.00km and the most downstream section (P42) having a chainage of 106.530 km.

The site has seven cross sections numbered P6, P6.4, P6.6, P7, P8, P9 & P10. The locations of the cross sections on the site are shown in the study's figure 5. The flood level estimates have been computed for the probable maximum flood or extreme flood, 1 in 100 year flood, 1 in 50 year flood and 1 in 20 year flood.

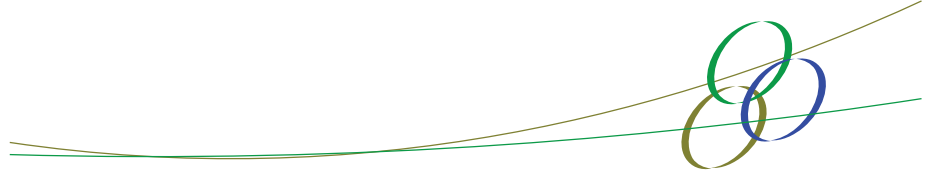
Hard and Forester surveyors have reproduced the study's flood levels onto a topographic map of the site to show the area of the site that is impacted a 1 in 100 year flood, as illustrated in Appendix 16. The survey map shows the majority of the site is not subject to the 1 in 100 year flood. Future development of the site will need to consider the 1 in 100 year flood event.

The other possible water source that could impact the site is Glenfield Creek. Glenfield Creek is within the Georges River catchment and the Liverpool District sub-catchment.

Glenfield Creek is approximately 1.3km long and starts near the new Glenfield residential area on Glenfield Road then meanders north east alongside the western edge of the city bound railway line, through Leacock Regional Park in Casula, underneath the railway line and then flows into the Georges River near Casula Railway Station.

The site's western boundary originally had minor tributaries that ran into Glenfield Creek. Sand extraction, landfilling and the construction of the East Hills Rail Line has removed the minor tributaries.

Substantial deviation works are being undertaken as part of the South Sydney Freight Line flyover. The creek realignment will follow the Glenfield Road and then relocate around the Glenfield Substation along Leacock Regional Park. The creek will then go under the proposed flyover and follow the existing creek near the existing park wetland.



Any current and future Glenfield Creek flooding will only affect the adjoining areas west of the city bound railway line e.g. Glenfield Road fronting the new Glenfield residential area and Leacock Regional Park . Any Glenfield creek flooding will not adversely impact the site.

Geotechnical Matters - Geology and Soils

The CES report, included as Appendix 24 provides a summary of the subsurface conditions underlying the site.

The site is underlain by Triassic age Ashfield Shale, (part of the Wianamatta Group) as well as Quaternary alluvium, comprising medium grained sand, clay and silt, associated with the Georges River system and tributaries.

The soils underlying the site (where they have not been removed by excavation) belong to the Blacktown soil landscape group. These soils are found on undulating rises on Wianamatta Shales. Soils are shallow to moderately deep on crests, upper slopes and well drained areas and deep on lower slopes and areas of poor drainage. The limitations of this soil landscape group are moderate reactivity, low soil fertility and poor drainage.

From a geotechnical perspective the report concludes the site can be rezoned and used for industrial purposes.

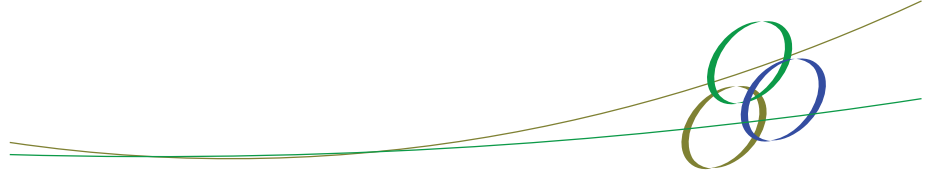
Cultural Heritage

A search of the State Heritage Register and the Campbelltown (Urban Area) Local Environmental Plan 2002 heritage schedule confirm there is no significant European cultural heritage located on the site.

AHMS has prepared an Aboriginal heritage preliminary assessment report for the rezoning of the site, included as Appendix 22.

The assessment was undertaken in accordance with relevant guidelines and codes of practice and included input from Neil Sampson a representative from the Tharawal LALC and Glenda Chalker a representative from the Cubbitch Barta Aboriginal Corporation. The assessment found:

- Most of the site was heavily disturbed and/or previously developed and the potential for preservation of archaeological materials was low;
- Two areas were identified as having received limited impact i.e. an undisturbed piece of bushland in the western quadrant of the site and a minor tributary in the eastern quadrant of the transmission line;
- There are four Aboriginal objects/sites identified within the undisturbed areas; and



- While the undisturbed areas require further assessment and/or management as part of development planning it is considered that there is no heritage reason why the proposed rezoning should not proceed.

Traffic and Connectivity

AECOM's traffic and transport report May 2012, included as Appendix 15 concludes:

- There is a heavy reliance on cars in the North Campbelltown area, especially trips made to this area as a destination;
- Significant public transport investment in rail & bus services close to the site will improve accessibility to this site and reduce car reliance in the area;
- Good access to rail and bus services at Glenfield Station;
- Good connectivity and direct access to Sydney's Motorway Network and the surrounding sub-arterial road network;
- Capacity on the local road network with the flexibility of upgrading the local road network to cater for some future traffic growth;
- Access to regional cycleway infrastructure that provides a sustainable alternative mode of travel; and
- Low provision of walking facilities in the area.

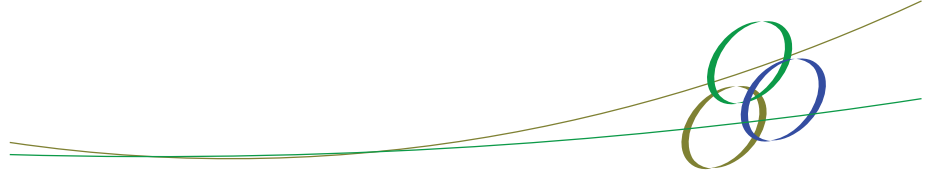
1.1.10 How has the rezoning submission adequately addressed any social and economic effects?

Both State and Local Governments have strategically identified the site to provide employment lands for regional and local areas.

The site is located within 1.0km of the Glenfield rail station, the gateway to the South West Growth Centre and a key transfer node between services on the East Hills, Main South and Cumberland Lines, and on the Liverpool –Campbelltown strategic bus corridor (Corridor 31).

Some of the key implications of the regional and local population profiles include:

- The local and regional population is growing. There is significant forecast growth associated with the adjacent South West Growth Centre (110,000 new dwellings for 300,000 people over the next 25-30 years;
- The State Government has set new jobs target for the South West subregion including specific targets for Liverpool and Campbelltown LGAs;

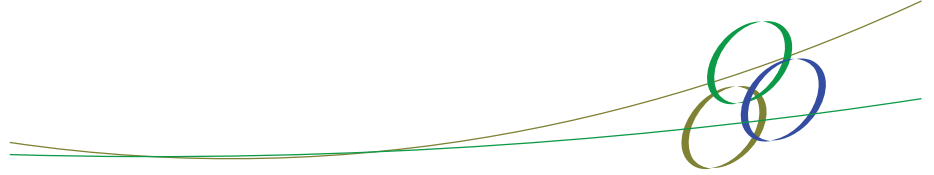


- Campbelltown's 2011 Employment Lands Review Report identified a 250 hectare shortfall of employment lands within the Campbelltown LGA to meet Campbelltown's 2031-2036 employment land requirements;
- In the context of other Metropolitan regions the South West Subregion and the local region have the lowest employment self-sufficiency and lowest provision of jobs available per person in the labour force;
- There is high dependency on private motor vehicles for transport; and
- Higher levels of local and regional unemployment with some areas up to twice the national average.

There are significant local and regional employment opportunities that will be associated with the construction and operation of warehousing and logistics facilities on the site. This has the potential to provide a significant social and economic benefit locally and regionally including:

- Increasing the supply of employment lands;
- Increasing the number of jobs closer to home that are easily accessible to large population centres;
- Reduced travel distance and commuting time for local and regional potential employees;
- Decreasing private car emissions and thus improving the air quality in Western Sydney;
- New jobs created from construction, operation, logistics and transport;
- The type of employment will include a range of skilled and unskilled labour needs;
- Potential opportunities for youth or long term unemployed people in the region; and
- Potential opportunities to support and improve employment outcomes for Aboriginal people.

The rezoning of the site for employment lands will have a positive social and economic impact on both the regional and local communities.



6.4 State and Commonwealth Interests

1.1.11 Is there adequate public infrastructure for the proposed rezoning and related land uses?

The SMEC services report, included as Appendix 14 confirms the provision of the following services;

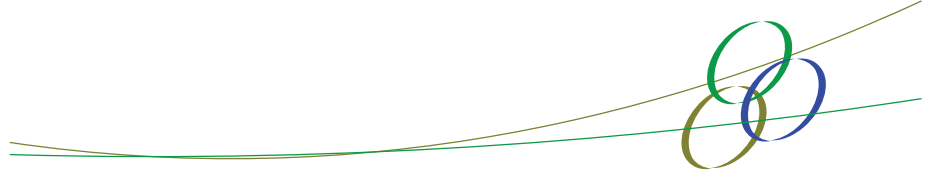
- Electricity – connection to either the Preston substation or the substation currently being constructed at Casula.
- Sewer – connect to one or all of existing pump stations at Trobriand Crescent SP0378 and/or Railway Parade and Canterbury Road SP0379 and/or connect to Belmont Road Glenfield existing gravity sewer.
- Water – connect to one or both 300mm diameter water main in Canterbury Road and or the 375mm diameter main within Glenfield Road.
- Telecommunications – A number of providers have services within close proximity to the site.
- Gas – connection to a Jemena high pressure natural gas main is located within Canterbury Road.

The site is located within 1.0km of the Glenfield rail station and on the Liverpool –Campbelltown strategic bus corridor (Corridor 31).

The proposed employment lands will support the local and regional Government target populations and the significant forecast growth for the adjacent South West Growth Centre.

1.1.12 What are the views of the State and Commonwealth public authorities to the rezoning?

State and Commonwealth public authorities will make submissions on the proposed rezoning during the exhibition of the Campbelltown City Council's SILEP.



7 COMMUNITY CONSULTATION

The community will make submissions on the proposed rezoning during the exhibition of the Campbelltown City Council's SILEP.