



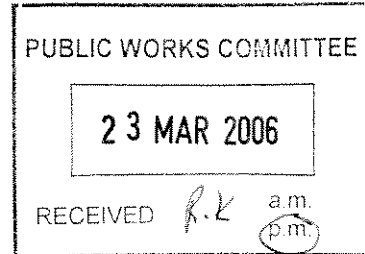
Mayor Helen Westwood Bankstown City Council

SUBMISSION 3.....



23 March 2006

The Secretary
Public Works Committee
Parliament House
CANBERRA ACT 2600



Dear Sir/ Madam

Re: Submission to the Public Works Inquiry for the Villawood Immigration Detention Centre Redevelopment, Villawood, Sydney, on behalf of Bankstown City Council.

Thank you for the opportunity to provide submission to the Public Works Inquiry for the Villawood Immigration Detention Centre (VIDC) Redevelopment proposal. The VIDC is located on 18.5ha of Commonwealth land at Villawood, within the northwest region of Bankstown Local Government Area. The proposed redevelopment is subject to Commonwealth legislation, the guiding legislation being the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

Council has met with representatives of Department Of Finance & Administration (DOFA), the Department Of Environment & Heritage (DEH), and Department Of Immigration & Multicultural & Indigenous Affairs (DIMIA) and their Project Managers Carson Group, on two occasions and discussed items affected under the EPBC Act including but limited to; site conditions and constraints, biodiversity and environmental impacts, heritage, social impacts, surrounding residential and industry zonings, urban design and access for the subject site. Council has also reviewed the 'Statement Of Evidence' prepared by DOFA and briefly reviewed the DEH draft 'Environment Assessment' in preparation for this submission.

Council is in support of the social initiatives and changes brought forward by the Palmer Report (2005), to be realised at the Villawood site, including family accommodation, individual unit accommodation replacing dormitory-style accommodation, improved mental health services, and improved visitation/ interviewing/ interface areas and greater recreation provision.

Council also recognises that development of this magnitude will have a direct impact on the amenity and visual impact of the surrounding area both during construction and when operational.

Primary items of concern to Council and for consideration in preparation of further design are summarised as follows:

ENVIRONMENTAL IMPACTS

Biodiversity & Ecology

- Cumberland Plain Woodland (CPW)/ Cooks River Castlereagh Ironbark Forest (CRCIF) in south corner must be retained and protected. Conservation value is assessed in considering biodiversity value of surrounding areas, that is, as a sum of parts. The proposal indicates a 50% loss of remnant bushland on site (0.2ha), which will decrease the cumulative biodiversity value of adjacent remnant bushland and habitat with surrounding scattered urban trees.

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Note: A recent referral for adjacent access road (2005/2299) included conservation assessment based upon existing remnant bushland in this area.

- The proposal describes the 0.4ha remnant CPW/ CRCIF as having a moderate to low anticipated recovery rate. Further, that conservation significance lies primarily in the presence of mature trees across the site, indicating that design layout will observe this conservation significance and avoid clearing of mature trees wherever possible. The proposal however indicates removal of mature trees across the site and significant hard-stand proposed for the core remnant bushland area. Council's position is that retention of all remnant bushland is necessary. This is supported by Council's Biodiversity Strategy 2002 that describes this area as a 'supplementary corridor' within 200m of a core biodiversity corridor.
- The proposal indicates loss of all hollow bearing trees, currently providing habitat across the site. Council considers that the site could be better designed to enable retention of a significant portion of these trees, by incorporation of site-specific design, re-arrangement of building footprints, and consolidation of development into two-storey rather than single-storey accommodation. Council rejects arguments brought forward by representatives of DOFA that the site requires to be leveled by significant cut and fill to such an extent to enable level grade walking paths throughout the site.
- The inclusion of habitat boxes as alternatives to hollow bearing trees, whilst recommended as part of the EA, does not appear within the proposal submitted as part of the Statement Of Evidence.
- Native seed must be collected from any indigenous native tree on site determined for removal and propagated for use on-site or in surrounding local area.

Stormwater Management/ Topography

- The proposal indicates extensive areas of cut and fill across the site, which will impact upon drainage flows, potential to retain trees and visual character of the gently undulating site. Numerous design measures can be undertaken to work with existing topography without impacting on the capacity or building requirements of the site. Council requests that these measures be explored more closely.
- The development of the site should not have any adverse impact on flood levels and/or flows downstream of the site. A flood study will be necessary to establish no adverse impact.
- Significant Council drainage systems exist on the site and any development should be clear of the drainage pipe systems.
- Overland flow paths in excess of the capacity of pipe system should be retained and floor levels determined accordingly.
- Development of the site must maintain compliance with requirements contained in Bankstown Drainage Standards Policy.
- The section of open drain upstream of Birmingham Ave is recommended to be piped.

HERITAGE

- The VIDC is included on the Commonwealth Heritage List as a 'listed place', this citation based upon all of the buildings on site. Council emphasises the importance of heritage values being placed on a sense of attachment to a place and the strong emotive ties that bind former residents of the immigration processing centre and hostel as equally significant. As such the preservation of heritage on site extends to keeping the recognition of past processes and events alive through re-telling of stories and experiences rather than static reminders in the form of inaccessible, unused buildings. Council would therefore recommend a greater commitment to active, adaptive re-use of heritage buildings through retention on site and interpretation through access to buildings.
- Heritage buildings are noted for conservation in the north-west corner of the site, viewed from Miowera Road but with public access prohibited. Council requests that an accessible interpretive display be provided within view of the heritage buildings to enable a greater understanding of the site.
- An on-going maintenance plan must be formulated and enabled to preserve the buildings indefinitely.

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- Guaranteed periodic access to the buildings is requested for purposes such as 'Heritage Week' initiatives.
- Heritage assessments based on physical buildings on site do not appear to reference other heritage sites nearby, such as the Potts Hill Reservoir and other Government project initiatives that formed part of the labour exchange agreements of early post-war migration. Links to local support networks such as churches, social groups and schools should also be further recognised.
- Consideration should be given to school-based programs providing 'enactment experience' or a living heritage focus, utilising the heritage buildings.
- Heritage values must also include physical aspects of the site, such as location, topography and vegetation.

SOCIAL IMPACT & COMMUNITY RELATIONSHIPS

- The report indicates that the recreational facilities are being upgraded and this is supported in light of feedback Council has received. These improvements should enable the outreaching of appropriate and approved programs to the detention centre to be more easily accommodated, both Council-based initiatives and other social support groups.
- Council notes the redevelopment proposal goes to some lengths to address the reduction of an institutionalised feel to the site with the removal of razor wire and construction of better standards of accommodation. The proposal does however still present as a secure compound with poor interface to buildings or access points to surrounding residential streets. Proposed 3.6m high fencing, separation between multiple perimeter fences, lack of screen planting to fence proximity and flood lighting compound this issue. The proposal clearly indicates an inward-focused regime diametrically opposed to the history of the site where focus was optimistic and to the future.
- Council notes that 8 x 3-bedroom duplex townhouses are proposed for family-style accommodation in the area facing Miowra Road, and question this requirement when the desire is to have children out of detention centres.

Note: In June 2005 the Federal Government announced that all families in detention were to be moved into residence determination arrangements within the community. Subsequently all children were moved out of Villawood. The Statement of Evidence confirms that *'in accordance with Govt. policy families with children would only be accommodated within Villawood in exceptional circumstances and as a last resort. This period of detention will be as short as possible'*.

URBAN DESIGN

- The proposal indicates predominantly single storey accommodation units, which could increase to double storey as per surrounding 2(a) Residential Zone to assist in reduction of land area for building footprint. The proposed setbacks are sufficient to enable more intensive development in the core site area, thus enabling better use of existing land area and possible further retention of significant site trees.
- The redevelopment must ensure adequate off-street parking is provided to accommodate all employees and provide for visitors. The proposals indicates significant areas of carparking however the layout of this carparking could be re-arranged to better suit site conditions and retain existing mature remnant trees and bushland.
- Pedestrian links to public transport must be ensured for employees and visitors.
- Legible entryway must be provided to the site for ease of visitation, taxi pick-up, deliveries, and service vehicles. This may include appropriate directional and wayfinding signage from Woodville Road.
- Proposed lighting within the site must be designed so as not to create undue light spillage to adjacent residential areas, or interfere with native fauna either on-site or in adjacent sites.

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Landscaping

- Sufficient landscaping screening must be provided at all interfaces to existing land uses. Where appropriate full range of planting including ground cover, shrub screen and canopy tree planting must be included, with a predominance of indigenous natives sourced from local provenance.
- Where sightlines must be maintained for security purposes, landscaping shall be of ground covers, shrubs to a maximum height of 600mm from ground level, and single clear-trunk canopy trees.
- At detailed design phase, and prior to works commencing on site, the preparation of landscape strategy for the entire site must be entered into in consultation with Council's Landscape Architect and Bushland Officer.

Interface & security to recently rezoned Residential 2(a) land

- The recreation area indicated to the southeast corner is adjacent to the proposed light industrial area in the recently rezoned redevelopment area. It should be noted that passive surveillance would be minimal in this zone after hours or during weekends.
- Perimeter fencing is to be visually unobtrusive and styled to suit the environment and reduce the institutional aspect.

AMENITY FOR DIMIA PERSONNEL

- Council notes an increase in DIMIA staff numbers on-site up to approx. 300 staff. Accordingly the proposed administration amenity must comply with the OH&S Act 1991 with regard to health safety and welfare at work and occupational environment. Indicative layout of staff office facility appears to be intensive and Council questions the buildings capacity to meet best practice principles for environmental design and sustainable development.
- Council is concerned that the proposal does not provide sufficient facilities for the anticipated large number of staff, in terms of a canteen or shop for convenient lunch supply. This will necessitate increased daytime car travel to Villawood and Chester Hill town centres.
- The redevelopment proposal does not indicate adequate recreation and lunching facilities for staff, such as dedicated private courtyard spaces with natural light and shade provisions.

Access to public transport facilities

- Pedestrian access to Leightonfield Station must be provided for promotion of public transport travel to site for both employment and visitation.
- The redevelopment proposal should at minimum include a standard 1200mm wide concrete paved footway for distance from site entry to railway station.

CONSTRUCTION ACTIVITY

- Construction hours are requested to be consistent with Council hours for construction activity to ensure consistency within local government area.
- Council notes that wastes will be generated during demolition and construction, and appropriate mitigation measures, including recycling and re-use of materials where appropriate, must be in place under a comprehensive construction management plan.

Yours sincerely



Clr Helen Westwood AM
MAYOR OF BANKSTOWN