



TM (F2004/06778)
(Contact Officer: Teresa Mok - 9399.0542)

2nd May 2007

Mr John Fuhrman
Inquiry Secretary
Parliamentary Standing Committee on Public Works
Parliament House of Australia
Canberra ACT 2600

Dear Sir,

Randwick Council's Submission to Standing Committee on Public Works on Inquiry into Provision of Facilities for Project Single LEAP – Phase 2

Thank you for providing Randwick City Council with the opportunity to comment on the Defence Department's proposal to undertake Project Single LEAP - Phase 2. The comments provided here relate specifically to the Randwick Barracks site, where a total of 650 units are proposed to be constructed as part of the Project.

I wish to bring to the Committee's attention that Randwick Council has considerable dealings with the Department of Defence on the redevelopment of its property holdings declared as surplus to its current needs. These properties are the Bundock Street redevelopment site and the Endeavour House redevelopment site (see attached maps).

The Bundock Street redevelopment site was declared surplus to the Defence Department's needs and has been the subject of rezoning processes pursuant to the NSW Environment Planning and Assessment Act. Later, a section of the northern part of the site was sold to a private developer, on which was developed new dwelling houses. The Defence Department is currently undertaking soil remediation works to decontaminate the eastern and southern portion of the Bundock Street redevelopment site.

Similarly, Endeavour House which currently provides accommodation for 528 defence staff has been classified as surplus and was subsequently sold to a private development company. Indeed, negotiation is currently underway between the developers and Council staff over the redevelopment of the site for private housing. It is understood from discussions with Defence Department staff that part of the 650 units proposed to be constructed in Randwick Barracks under Phase 2 will replace units lost from Endeavour House.

As such, the Council is concerned by the ad hoc approach in the planning and development of Defence Department's property holdings. The Local Government Area of Randwick is densely populated, with an estimated 3,227 persons per square kilometre. For comparison purposes, the estimated density for the Sydney metropolitan Area is 329 persons per square kilometre. The proposal will result in an increase of some 506 units of accommodation in the Barracks. When construction works on the adjoining Bundock Street development site is fully completed, it will

generate between 600 to 700 dwellings. Endeavour House is expected to yield more than 100 new dwellings. Therefore, any large scale redevelopment projects, particularly of the magnitude proposed for Randwick Barracks typically raises community concerns over the cumulative impact to the local neighbourhood. This is more so when one compares the scale of the Single LEAP proposal in Randwick Barracks with proposals for other barracks elsewhere.

For example, Lavarack Barracks in Townsville has a site area of 150 hectares and a proposal to provide 540 units. Robertson Barracks in Palmerston, Darwin has a site area of 1,200 hectares and a proposal to provide 686 units. Randwick Barracks has an approximate site area of 17 hectares, and a proposal to build 650 new units, of which 148 of existing units will be demolished, resulting in an estimated net increase of 506 units.

Please note that the site area of Randwick Barracks is 17 hectares and not 45 hectares as stated in the Defence Department's Statement of Evidence to the Joint Standing Committee. The Randwick Barracks site area was reduced after the rest of the site was declared surplus to the needs of the Department of Defence.

Although the proposed accommodation will be contained within Defence Department land, Randwick Barracks is already an established facility situated on a relatively small site in a highly urban setting. Therefore the Barracks may not have sufficient land area around it to form an adequate buffer to mitigate against potential development impacts.

Pertinent issues such as the cumulative traffic impact generated by the future housing from the neighbouring Bundock Street redevelopment site and nearby Endeavour House site will need to be taken into account before making any final decisions about Randwick Barracks and Project Single LEAP – Phase 2.

The Defence Department's *Statement of Evidence to the Joint Standing Committee on Public Works (page 13, Zoning and Approvals)*, has stated that "No civilian authority design or construction approvals are required..." Although commonwealth legislation has primacy over state planning and development laws, the reality is that Randwick Barracks is surrounded by residential development on all sides. The Barracks is also regarded by local residents as an integral part of the local community. Thus any significant physical changes proposed within the Barracks, which in this case involves the construction of an additional 506 units or rooms for Defence staff, will have an impact on the surrounding residents that cannot be glibly discounted¹.

Issues considered by Council to be important and requiring more detailed investigation prior to proceeding with Project Single LEAP Project – Phase 2 proposed for Randwick Barracks are presented below.

Land Contamination

As part of the approval process for the surplus Defence Department site at Bundock Street, major remediation was required in accordance with the provisions of the NSW Environmental Planning and Assessment Act and the NSW Contaminated Land Management Act. Soil testing undertaken on the adjoining Bundock Street site, previously a part of Randwick Barracks prior to its disposal, confirmed the presence of chemicals of concern. These chemicals associated with the tested site were:

¹ Defence Department's Statement of Evidence to the Joint Standing Committee on Public Works on Project LEAP Phase 2, 15 March 2007, page 18 stated in point 75, under **Impact on Local Communities**, "As all work is proposed to be contained on Defence bases no adverse impact on local communities is anticipated."

- Total Petroleum Hydrocarbons (TPH);
- Benzene, Toluene, Ethyl benzene, Xylene;
- Polyaromatic Hydrocarbons (PAHs);
- Organochlorine/Organophosphorous Pesticides (OCPs/OPPs);
- Polychlorinated Biphenyls (PCBs);
- Heavy Metals (As, Cd, Cr, Cu, Ni, Pb, Zn, Hg); and
- Asbestos.

The Commonwealth Government has responsibility for the remediation of the adjoining Bundock Street development site and granted Randwick Council an indemnity against all legal liability arising from the effects of site contamination which the Council may incur for a 40 year period.

In light of the above, soil contamination within the Randwick Barracks site will need to be addressed as a matter of priority. Site testing for land contamination should be undertaken by the Defence Department and any subsequent remediation works being completed prior to committing Randwick Barracks as part of the PPP Project Single LEAP - Phase 2. Should site testing confirm the presence of contaminants and the need for remediation, such works will need to be carried out in accordance with both Commonwealth and State Government requirements. Measures will need to be put in place by the Defence Department to ensure that Council and the surrounding communities are fully notified well in advance of remediation works commencing on the subject site.

Increased Traffic Volume

As an estimated 506 units of accommodation are proposed to be added to the site, the volume of traffic generated is expected to increase. Avoca Street is an arterial road linking traffic between the northern and southern suburbs of the LGA, before connecting with Anzac Parade at Kingsford, the City's major north-south route.

It currently carries high traffic volumes and provides vehicular access for local residents, as well as traffic generated by adjoining land uses including two primary and two high schools, University of NSW campus and the Randwick Hospital Complex (Prince of Wales Public and Private Hospitals, the Children's Hospital and Royal Hospital for Women). Therefore Randwick Council would contend that the proposal to increase the Barrack's accommodation capacity by 506 units will have an adverse impact on the surrounding neighbourhood.

A detailed traffic and parking study should therefore be commissioned and the cumulative impact arising from the proposed development assessed, prior to proceeding with the PPP and design development phase of the Project. As stated earlier, this traffic study should take into account the cumulative traffic impact on Avoca Road and surrounding local road network of the 600 – 700 additional dwellings generated from the adjoining Bundock Street redevelopment site.

Conclusions

- For reasons already highlighted in this submission, Council submits that the Joint Standing Committee on Public Works should require the Department of Defence to examine more closely the cumulative impacts a 650 units development proposal will have on the surrounding communities. This is critical given that the adjoining surplus defence site is also projected to have a yield of between 600 to 700 dwellings.
- Unlike the other Barracks proposed for development, Randwick Barracks is located in a densely populated urban area and now occupies a site area of only 17 hectares². It has the smallest site area out of the 17 bases identified for Project Single LEAP – Phase 2, yet Randwick Barracks is earmarked for the highest number of units, after Robertson Barracks (686 units on 1,200 Ha, in the Northern Territory).
- The planning issues and associated conflicts arising from this proposal will be different to that associated with a larger base in remote or less populated areas. Therefore, the Standing Committee is urged to consider the cumulative impact of the Randwick Barracks development proposal on the surrounding community.
- Consultation between the Defence Department and Randwick Council is crucial and would need to commence as early as possible to discuss issues such as suitable scale for the development proposal. This discussion, along with the commissioning of impact assessment studies such as traffic, parking and soil contamination, will need to take place before a public private partnership arrangement is entered into for Randwick Barracks. This is essential in order to minimise any adverse cumulative impact the development may have on local communities, given the substantial Defence Department's redevelopment activities that is presently underway.

I am attaching, for the Committee's information:

- (a) An aerial photograph showing Randwick Barracks in its urban context
- (b) A marked up Plan of Randwick Barracks and the location of its adjoining land, Bundock Street site, declared as surplus by Defence Department and earmarked for between 600 and 700 dwellings.

Please do not hesitate to contact Sima Truuvert on (02) 9399 0891 or Teresa Mok on (02) 9399 0542 or by email at teresa.mok@randwick.nsw.gov.au if you have any queries.

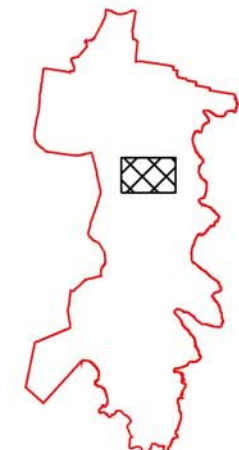
Yours faithfully

Ray Brownlee
General Manager


² As shown on the attached plan, area now identified as Randwick Barracks was excised from the bulk of the Defence Department's property and declared as surplus. It has been rezoned for residential development, with a projected yield of 600 – 700 dwellings. Soil remediation by Defence Department is underway, in preparation for future disposal to private development companies.



Aerial Photography of Randwick Barracks Attachment (A)



Legend

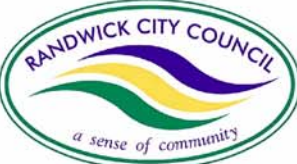
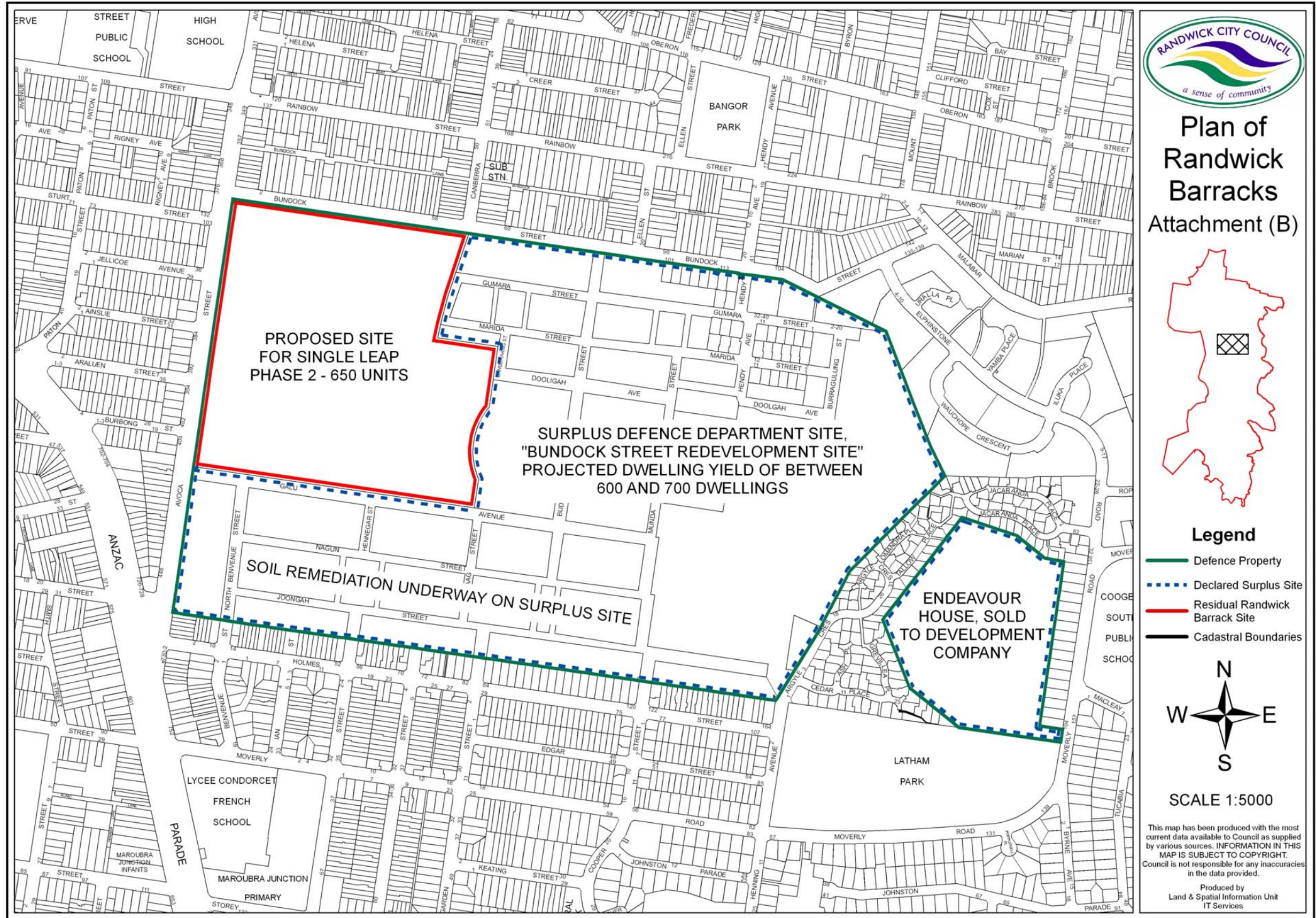
- Randwick Barracks
 - Cadastral Boundaries
 - LGA Boundary
- 

SCALE 1:8000
Aerial photography supplied by

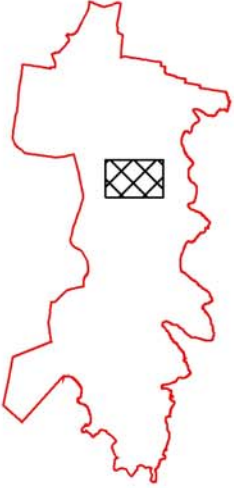


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**Plan of
Randwick
Barracks
Attachment (B)**



Legend

- Defence Property
- - - Declared Surplus Site
- Residual Randwick Barrack Site
- Cadastral Boundaries



SCALE 1:5000

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