

Our ref: D01688785

18 April 2013

**Submission No. 04**

(Landing helicopter dockships)

Date: 18/04/13

Clerk Assistant (Committees)  
House of Representatives  
PO Box 6021  
Parliament House  
CANBERRA ACT 2600

Dear Sir/Madam

**Re: Randwick Council's Submission to the Parliamentary Standing Committee on Public Works**

Thank you for providing Randwick Council with an opportunity to comment on "Landing Helicopter Dock Ship Sustainment Facilities". The comments provided below relates to the training facilities at Randwick Barracks.

In the past 15 years Randwick Council has had considerable dealings and involvement with the Department of Defence in the planning and redevelopment of this site. The Council has made a number of submissions to the Parliamentary Standing Committee on Public Works about the future planning and the use of the site.

**Background**

In 1999 a major part of the Barrack site was declared as surplus to the Department of Defence's needs and was subject of the rezoning process under the NSW planning legislation. The surplus site was zoned for residential, also providing a community centre and a number of open space areas. In fact, a portion of the site to the north-eastern corner was sold to private developers and was subsequently developed for new dwelling houses. The Department also in the anticipation of the future development of the surplus site made good the provisions for a community facility (2006) and a major park (2011) within the surplus site. The surplus site was to accommodate 660-700 dwellings. The Department's sale of part of the former site has led to the construction of just over 100 dwellings.

In 2007, the Defence announced the provision of accommodation for 528 Defence staff in Randwick Barracks which was subject of the consideration by the PWC. Neither the Council nor the community has been advised of the faith of this project.

**Current Position**

In 2011 as a part of Council's review of its Local Environmental Plan (LEP) the Department of Defence requested for a section of the previously surplus residentially zoned land to be rezoned to special uses Defence (SP1) under NSW planning controls. Council's new comprehensive LEP (LEP 2012) which came to effect in February 2013 rezoned the land to SP1-Defence (see attached map Appendix 1).

During the Public exhibition in early 2012, of the LEP the Department of Defence further requested that the remainder of the surplus site to be rezoned to SP1-Defence. The

Council was not able to agree with the Department as this would have necessitated the re-exhibition of the LEP. Further, it would have impacted the access to both the community facility and the parklands. The Council officers requested that the Department's representatives liaise with Council with regard to the long term future use and the zoning for the site. The Council has not been provided with any further information.

At best the Department's Defence approach to this site has been ad-hoc, piece meal, and has lacked strategic vision. This has created a climate of uncertainty for the surrounding residents. The change from earlier plans has also impacted the surrounding residents' access to the community and recreational facilities. The earlier master plan for the site proposed a number of access points for the surrounding community to access the community facilities. This has not been undertaken and access to the community and recreational facilities remain limited.

Lastly, the Department of Defence had advised the community that the surplus site would be fully remediated as a part of the redevelopment process. Neither the Council nor the residents have any current information with regards to the remediation.

The Council is highly concerned about the lack of strategic vision for this significant site. It is considered imperative that the Department prepare a comprehensive strategic plan for the site in consultation with Council.

### **AWD Training Centre at Randwick Barracks**

The Department of Defence's submission notes that the AWD Training Centre at Randwick Barracks will provide a new two storey purpose built facility for; computer, specialised simulator and emulators and equipment based training. The new facility will comprise of approximately 5800m<sup>2</sup> specialised buildings together with other ancillary facilities. A new car park with 187 spaces is also provided.

The Defence's submission notes an increase of 110 personnel per working day.

### **Key Issues**

- *Suitability location of facilities with Randwick Barracks*

Given the scale of the Defence site, the proposal should preferably be based on a strategic approach for the site as a whole. This would clarify the relationship of the proposed facility to the other facilities within the north-western part of the site. There is also a need to clarify whether the Defence site still intends to provide the residential facilities for 528 personnel as proposed in 2007.

In this regard, the siting and relationship of these facilities and how they would interface with the surrounding residential development in terms of access and traffic should be clarified.

It is noted in the Department of Defence's submission that a Barracks preliminary zone plan has been prepared, however, it has not been provided with the submission nor Council has had any discussion with the Defence about it. It is requested that the Department provide Council with a copy of the preliminary zone plan.

- *Residential Context*

The Defence southern boundary adjoins the backyards of residences located along Holmes Street. It is noted the Defence proposes the new facilities to be set back from the residence to the south.

There are no scaled drawings showing the set backs provided nor are there any scaled drawings that stipulate the building heights.

Measures should be put in place to not overshadow the backyards of the residents to the south. The measures should also include:

- a landscape buffer area of at least 9 metres to the south of the proposed building;
  - addressing the relationship to the adjoining residences in terms of height, bulk, scale and building design;
  - appropriate colour and material to minimise glare and impact to the surrounding neighbourhood.
- *Demolition & Site Remediation*

A Site Contamination Investigation should be undertaken by an independent appropriately qualified environmental consultant, to provide a report on land and ground water contamination and migration in relation to past and current activities and uses that may have occurred on the site.

The report is to be prepared in accordance with relevant Guidelines made or approved by the NSW Environment Protection Authority (EPA), including the Guidelines for Consultants Reporting on Contaminated Sites and the National Environment Protection (Assessment of Site Contamination) Measure (NEPM) 1999. Also, as detailed in the Planning Guidelines to SEPP 55 – Remediation of Land, the report is to assess the nature, extent and degree of contamination upon the land.

Should the Site Investigation Report identify that the land is contaminated and the land requires remedial works to meet the relevant criteria in the National Environment Protection (Assessment of Site Contamination) Measure (NEPM) 1999, the following matters should be implemented:-

- A Remediation Action Plan (RAP) Site should be prepared by a suitably qualified and experienced environmental consultant in accordance with the relevant Guidelines made or approved by NSW Environment Protection Authority (EPA), including the Guidelines for Consultants Reporting on Contaminated Sites.
- The subject land should be remediated to ensure that the site is suitable for the proposed development and satisfies the relevant criteria in the NEPM 1999.
- Remediation works should be carried out in accordance with the requirements of the *Contaminated Land Management Act 1997*, environmental planning instruments applying to the site, guidelines made by the NSW Environment Protection Authority (EPA) and NSW Planning & Infrastructure and the *Protection of the Environment Operations Act 1997*.
- A Site Remediation Management Plan should be prepared prior to the commencement of remediation works by a suitably qualified environmental consultant and be implemented throughout remediation works.

The demolition, removal, storage, handling and disposal of products and materials containing asbestos must be carried out in accordance with the relevant requirements of the Work Health & Safety Act 2011, WorkCover NSW and the NSW Environment Protection Authority (EPA).

An *Asbestos Management Plan* should be developed by a suitably qualified environmental consultant or Occupational Hygienist and be implemented throughout the works. The *Asbestos Management Plan* should incorporate measures to ensure the safety of site

personnel and nearby residents, including notification of works, complaints management, signage and air-monitoring and provision of clearance certificates, as applicable.

The proposed use of the premises and the operation of all plant and equipment should not give rise to an 'offensive noise' as defined in the *Protection of the Environment Operations Act 1997* and Regulations.

In this regard, the operation of the premises and plant and equipment should not give rise to a sound pressure level at any affected premises that exceeds the background ( $L_{A90, 15 \text{ min}}$ ) noise level, measured in the absence of the noise source/s under consideration by more than 5dB(A). The source noise level should be assessed as an  $L_{Aeq, 15 \text{ min}}$  and adjusted in accordance with the NSW Environmental Protection Authority's Industrial Noise Policy 2000 and Environmental Noise Control Manual (sleep disturbance).

A report, prepared by a suitably qualified and experienced consultant in acoustics, should be obtained prior to occupation of the development, which demonstrates and certifies that noise and vibration from the development satisfies the relevant provisions of the *Protection of the Environment Operations Act 1997*, NSW EPA/DECC Noise Control Manual & Industrial Noise Policy, Council's conditions of consent (including any relevant approved acoustic report and recommendations), to the satisfaction of Council. The assessment and report must include all relevant fixed and operational noise sources.

A *Construction Noise & Vibration Management Plan*, should be prepared in accordance with the Office of Environment & Heritage - Environment Protection Authority (formerly DECC) for Construction Noise and Assessing Vibration, by a suitably qualified person, is to be developed and implemented prior to commencing site work and throughout the course of construction.

A Construction Site Management Plan should be developed and implemented throughout construction and site works. The construction site management plan should include the following measures, as applicable:

- location and construction of protective site fencing / hoardings;
- location of site storage areas/sheds/equipment;
- location of building materials for construction;
- provisions for public safety;
- dust control measures;
- details of proposed sediment and erosion control measures;
- site access location and construction
- details of methods of disposal of demolition materials;
- protective measures for tree preservation;
- location and size of waste containers/bulk bins;
- provisions for temporary stormwater drainage;
- construction noise and vibration management;
- construction traffic management details;

Building, demolition and associated site works should only be carried out in accordance with the following requirements:

Activity	Permitted working hours
All building, demolition and site work, including site deliveries (except as detailed below)	<ul style="list-style-type: none"> <li>• Monday to Friday - 7.00am to 5.00pm</li> <li>• Saturday - 8.00am to 5.00pm</li> <li>• Sunday &amp; public holidays - No work permitted</li> </ul>
Excavating of rock, use of jack-	<ul style="list-style-type: none"> <li>• Monday to Friday - 8.00am to</li> </ul>

hammers, pile-drivers or the like	5.00pm <ul style="list-style-type: none"> <li>• Saturday - No work permitted</li> <li>• Sunday &amp; public holidays - No work permitted</li> </ul>
Internal work only within a commercial or industrial development, located in a commercial or industrial zone, which is not audible within any residential dwelling or commercial or industrial premises	<ul style="list-style-type: none"> <li>• Monday to Saturday - No time limits (subject to column 1)</li> <li>• Sunday &amp; public holidays - No work permitted</li> </ul>

- Access

In recent discussion with the Department of Defence Council was made aware that there had been cases that people have tried to access the site by breaking the locks and fence around the site.

As a part of the proposed development of the site for residential use, a community centre and parklands were built in the centre of the site. Under the initial master plan for the site multiple access points were proposed. Although these community facilities are operational, the access points from Holmes Street were never constructed.

To overcome the problem with vandalism, it is recommended that the Department of Defence consider the creation of interim access points and pathways to enable the community to access the facilities. In the longer term as a part of a comprehensive strategic plan for the site it is recommended that the Department formalise permanent access and paths to the community centre and the parklands.

### Conclusion

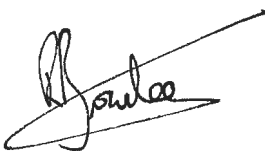
It is noted that the proposed training centre in Randwick Barracks is ancillary to the use of the site, however, this proposal needs to be considered in the broader context of the longer term plans for the use of the site.

The Department of Defence should consider a strategic approach for planning and development of the site including the cumulative impact of its plans on physical and social infrastructure of the area.

I hope the above assist the Public Works Committee in the consideration of this matter.

Should you require further clarification please do not hesitate to contact Sima Truvert, Director City Planning, on 9399 0891 during business hours Monday to Friday.

Yours faithfully



Ray Brownlee  
**General Manager**

