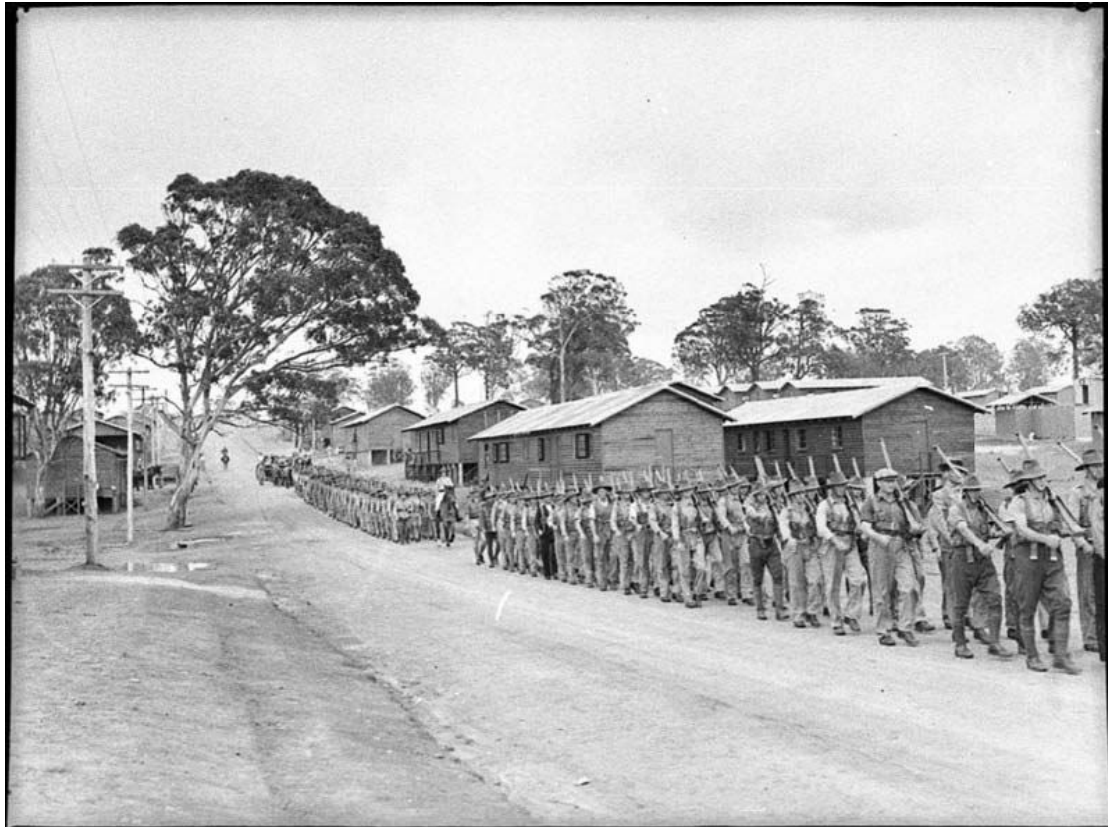


**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

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prepared for

**LANDCOM**

by

**TANNER ARCHITECTS**

52 Albion Street  
Surry Hills NSW 2010-08-26

Job No. 100511

AUGUST 2010

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

1 INTRODUCTION ..... 3  
1.1 THE SITE ..... 3  
1.2 THE CONCEPT PLAN AND STAGE 1 PROJECT APPLICATION ..... 4  
1.3 Project Application..... 5  
1.4 STRUCTURE OF THE STATEMENT OF HERITAGE IMPACT ..... 8  
1.5 DEFINITIONS ..... 9  
1.6 AUTHOR ..... 9  
1.7 IDENTIFIED HERITAGE ITEMS ..... 10  
2 historical overview ..... 11  
2.1 INTRODUCTION ..... 11  
2.2 EARLY EUROPEAN HISTORY ..... 11  
2.3 THE INGLEBURN DEFENCE SITE ..... 11  
3 assessments of significance..... 13  
3.1 AUSTRALIAN HERITAGE COUNCIL ..... 13  
3.2 CAMPBELLTOWN CITY COUNCIL..... 14  
4 STAtutory considerations ..... 15  
4.1 NSW HERITAGE ACT 1977 ..... 15  
4.2 DIRECTOR GENERAL'S REQUIREMENTS – PART 3A CONCEPT PLAN ..... 15  
4.3 CAMPBELLTOWN (URBAN AREA) LOCAL ENVIRONMENTAL Plan 2002 ..... 15  
4.4 CAMPBELLTOWN (SUSTAINABLE CITY) DEVELOPMENT CONTROL PLAN 2009 ..... 16  
4.5 CAMPBELLTOWN CITY COUNCIL DEVELOPMENT CONTROL PLAN NO.83 ..... 16  
5 PROPOSED WORK ..... 17  
5.1 DOCUMENTATION..... 17  
5.2 ARCHITECT'S DESCRIPTION ..... 17  
6 ASSESSMENT OF HERITAGE IMPACT ..... 19  
6.1 nsw heritage office model questions ..... 19  
6.2 CAMPBELLTOWN (URBAN AREA) LOCAL ENVIRONMENTAL PLAN 2002 ..... 22  
6.3 DEVELOPMENT CONTROL PLANS ..... 24  
7 DIRECTOR GENERAL'S REQUIREMENTS AND HERITAGE BRANCH REQUIREMENTS..... 27  
7.1 DIRECTOR GENERAL'S REQUIREMENTS ..... 27  
7.2 HERITAGE BRANCH REQUIREMENTS ..... 27  
8 CONCLUSION ..... 34

Document Status Register

Issue	Date	Purpose	Written	Approved
Draft	August 2010	Draft Issue to project team review	RL	
A	27 August 2010	Final Issue	RL	

## **EXECUTIVE SUMMARY**

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The Ingleburn Army Camp was one of Australia's major army camps from 1939-1970s. It has considerable historic significance because it was the first purpose-built infantry training camp for World War II and played a central role in the mobilisation of Australia's citizens and their military training throughout the war. It also played an important role in the training of personnel for the Korean and Vietnam Wars. The Army Camp was a major centre in Australia for training under the National Service Scheme (1951-1972), is also associated with the anti-conscription movement of the late 1960s and early 1970s and played a major role in the training of Army Reserves from 1973 through to the 1990s. The Ingleburn Army Camp has social significance because it is a tangible symbol of the service given by generations of soldiers who trained there and as a place where respect for and remembrance of that service became a highly valued tradition. It has value to those who lived, and worked there and has a long association with a State-wide "Army community". It also serves to symbolise the role of the Army within the area to the local community.

The significance of the site and buildings and other features remaining on the Army Camp site, along with its social significance, has been recognised by heritage listings at a Federal level (Register of the National Estate) and heritage listings by Liverpool City Council and Campbelltown City Council. Individual listed items include prefabricated cottages in the Ingleburn Village, the Ingleburn Military Heritage Precinct, the former Mess hall and the Mont St Quentin Oval, including entry gates.

This statement of Heritage Impact, prepared by Tanner Architects, responds to the Director General's Requirements for the subject site in accordance with Section 75F of the Environmental Planning and Assessment Act 1979 and in relation to Heritage, as follows : Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with *Assessing Heritage Significance* (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.

The report includes the following components:

- A summary site history;
- Summary of heritage significance of the site and individual built components;
- Statutory considerations;
- Evaluation of the proposed Stage 1 Project Application against Heritage Council guidelines and planning instruments of Campbelltown City Council.
- Evaluation of the proposed Stage 1 Project Application against the Director General's Requirements and the review of previous reports as required by the NSW Heritage Branch.

The report concludes that the proposed Stage 1 Project Application for Edmondson Park demonstrates compliance with the Heritage Act 1977, and the Director General's Requirements for the application including the heritage impact assessment guidelines published by the NSW Heritage Office and the heritage provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002.

The Stage 1 Project Application is a subdivision layout that has no impact on the neighbouring heritage item, the Mont St Quentin Oval.

## **1 INTRODUCTION**

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The report has been prepared by Tanner Architects to accompany a Project Application under Part 3A of the Environmental Planning & Assessment Act, 1979 (EP&A Act) for Stage 1 of Edmondson Park South.

Landcom is proposing to deliver a new diverse and sustainable urban community at Edmondson Park South. Once complete, Edmondson Park will accommodate a mix of land uses, a diversity of housing (approximately 3,200 dwellings), a new town centre incorporating 35,000 – 45,000m<sup>2</sup> retail, business and commercial floor space with employment opportunities for 1,000 people, multi-purpose community and education facilities, a new 150 hectare Regional Park, a number of other local parks and environmental conservation areas.

The new urban community at Edmondson Park South will meet the State Government's objectives to increase housing supply, provide community benefits and create jobs.

The Edmondson Park South project is the subject of a Part 3A Concept Plan and proposal to list Edmondson Park South as a State significant site under SEPP Major Development 2005. The purpose of the Concept Plan is to secure statutory approval for the overall planning framework for the site and to further resolve a number of remaining site-wide infrastructure delivery and land use planning issues. The Stage 1 Project Application (submitted concurrently with the Concept Plan) relates to early works, infrastructure and subdivision for the initial phases of the development and will enable site works to begin in 2010.

### **1.1 THE SITE**

The Stage 1 Project Application site comprises an area of approximately 40 hectares and forms part of the larger Edmondson Park Release Area within the South West Growth Centre. It is located within the southernmost portion of the larger development site to the north of the M5 Motorway and to the east of Zouch Road and is approximately 40 km to the south west of Sydney CBD. The site is wholly located within the Campbelltown LGA (refer to Location Plan at Figure 1).

The majority of the Stage 1 Project Application site is currently owned by the Commonwealth (Department of Defence) and was formerly used as an army camp and training facility (the Ingleburn Army Camp) up until the 1990s when it was identified as surplus to Defence requirements. Since this time it has been progressively vacated. The project is intended to be carried out once ownership or control of the former Ingleburn Army Camp land has passed to the State. Several roads within the site are owned by Campbelltown City Council.

The site is largely vacant. Remnants of military facilities associated with the site's former Defence use are scattered through-out the site.

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

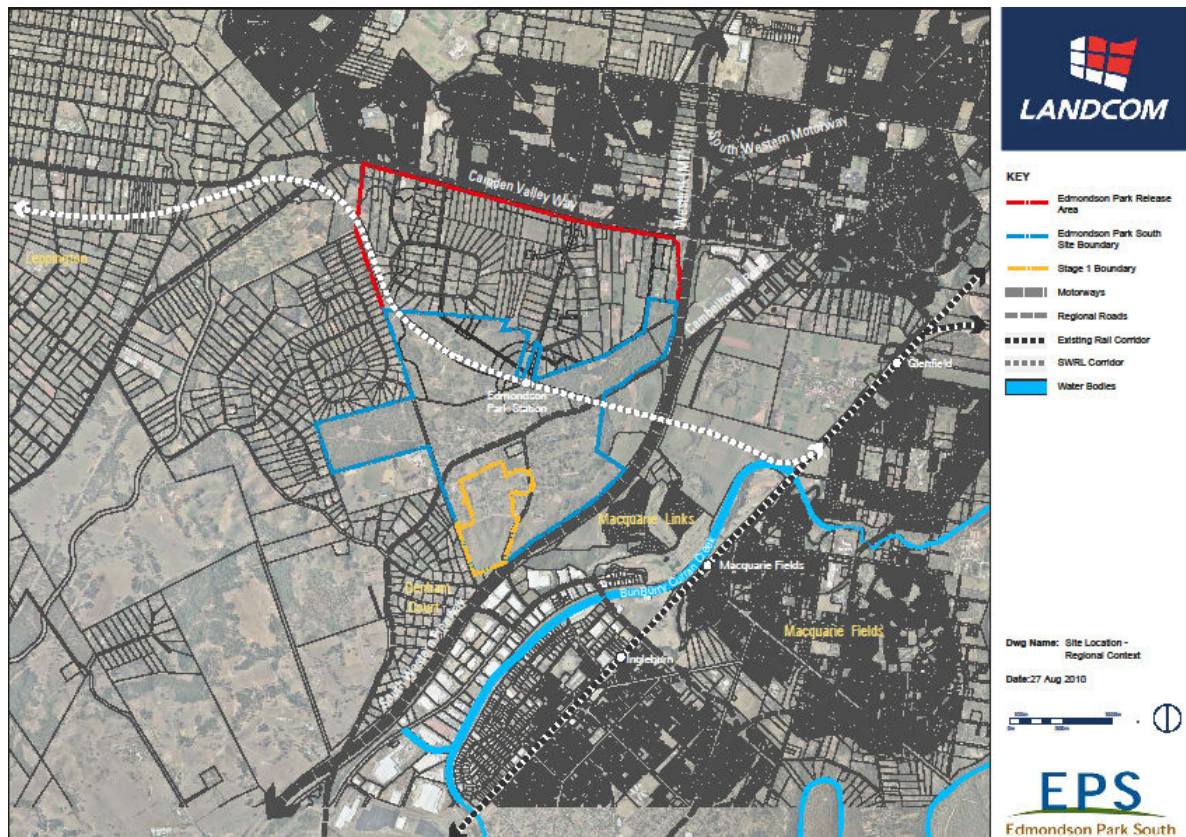


Figure 1: Context of Stage 1 Project Application

## 1.2 THE CONCEPT PLAN AND STAGE 1 PROJECT APPLICATION

### The Concept Plan

The Concept Plan establishes the overall planning framework for the site, including:

- land use type and distribution;
- a mix of housing types and densities (approximately 3,200 dwellings);
- concept location of and approximately 35,000 – 45,000 m<sup>2</sup> of retail / business / commercial floor space within the new Edmondson Park Town Centre;
- identification and location of open space and drainage corridors, environmental conservation lands (to form the new Regional Park), and local active and passive recreation facilities, including levels of embellishment;
- expanded Ingleburn North Primary School and new combined Primary/High School to the north of the site;
- road network layout;
- pedestrian and cycleway network layout;
- pedestrian bridge over the south western railway;
- Campbelltown Road corridor including the establishment of key intersection locations and configuration;
- utilities (including power, telecommunications and gas), infrastructure strategy, potable water strategy, sewer concept plan and water cycle management plan;
- location and dimensions of Bushfire Asset Protection Zones;

- appropriate interpretation of European and Aboriginal heritage located on the site;
- erection of signage and billboards;
- remediation works;
- decommissioning of the existing Sewerage Treatment Plant (STP); and
- demolition.

The Concept Plan also sets out an approval framework that will enable the carrying out of the works necessary to remediate the site in accordance with a Remediation Strategy without the need for undertaking further environmental assessment.

A variety of housing types is proposed to be delivered. This will provide for a range of housing price points and will include moderate income housing and housing for seniors.

It is proposed to develop the Edmondson Park site progressively in stages over a 15-20 year period. The Concept Plan will address the staging and delivery of the overall development having regard to the progressive delivery of necessary infrastructure, services and facilities; and market demand.

The Concept Plan is accompanied by a proposal with respect to the future developer contributions framework for the provision of local facilities and services within the Liverpool and Campbelltown LGAs as well as State Infrastructure.

### **1.3 PROJECT APPLICATION**

The residential subdivision Project Application comprises:

- the creation of 206 residential lots, 8 super lots for future subdivision 15 Environmental Living lots and 3 lots for dedication to Campbelltown City Council as Public Reserve in 5 stages\*;
- the dedication of roads to Campbelltown City Council;
- On-site works comprising:
  - tree removal;
  - earthworks including excavation, cut and fill;
  - design and construction of physical infrastructure, including roads, stormwater drainage and utility reticulation, traffic management works, establishment of open space areas;
  - retaining walls as determined during detailed design;
  - design and construction of staged stormwater water quantity and quality infrastructure to achieve objectives required by the Water Cycle Management (WCM) strategy for the greater site;
  - demolition of all existing structures;
  - erosion and sediment control to areas of roadworks and bulk earthworks including provision of temporary sedimentation ponds and diversion drains;
  - Design and construction of an ornamental pond;
  - Landscaping of road reservations;
  - erection of signage and billboards; and
  - Embellishment of open space.
- Off-site works comprising:
  - construction of the sewer lead in from the Sydney Water carrier main at Ash Road;
  - upgrade of overhead mains and construction of electrical lead-in feeders from the existing zone substation at Prestons;

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**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

- connection to utility services, potable and recycled water, electricity, gas and telecommunications in Campbelltown and MacDonald Roads;
- Connection to existing stormwater drainage;
- tree removal;
- earthworks including excavation, cut and fill;
- design and construction of physical infrastructure, including roads, stormwater drainage and utility reticulation, traffic management works, including the connection to the existing MacDonald Road;
- design and construction of staged stormwater water quantity and quality infrastructure to achieve objectives required by the Water Cycle Management (WCM) strategy for the greater site;
- erection of an acoustic wall;
- erection of signage and billboards;
- extension or relocation of existing services including potable and recycled water, gas, telecommunication, power;
- demolition of all existing structures; and;
- Proposed new intersection to existing Macdonald Road.

It is intended to seek staged Construction Certificates as necessary to facilitate the efficient delivery of each phase of, the development works.

The first stage residential Project Application will include the proposed construction of a gravity sewer line through the future Regional Park.

\* A number of residue lots will be created in undertaking the Project Application, the number of lots identified in the above description relate to the ultimate number of lots that will be created in the Project Application.

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

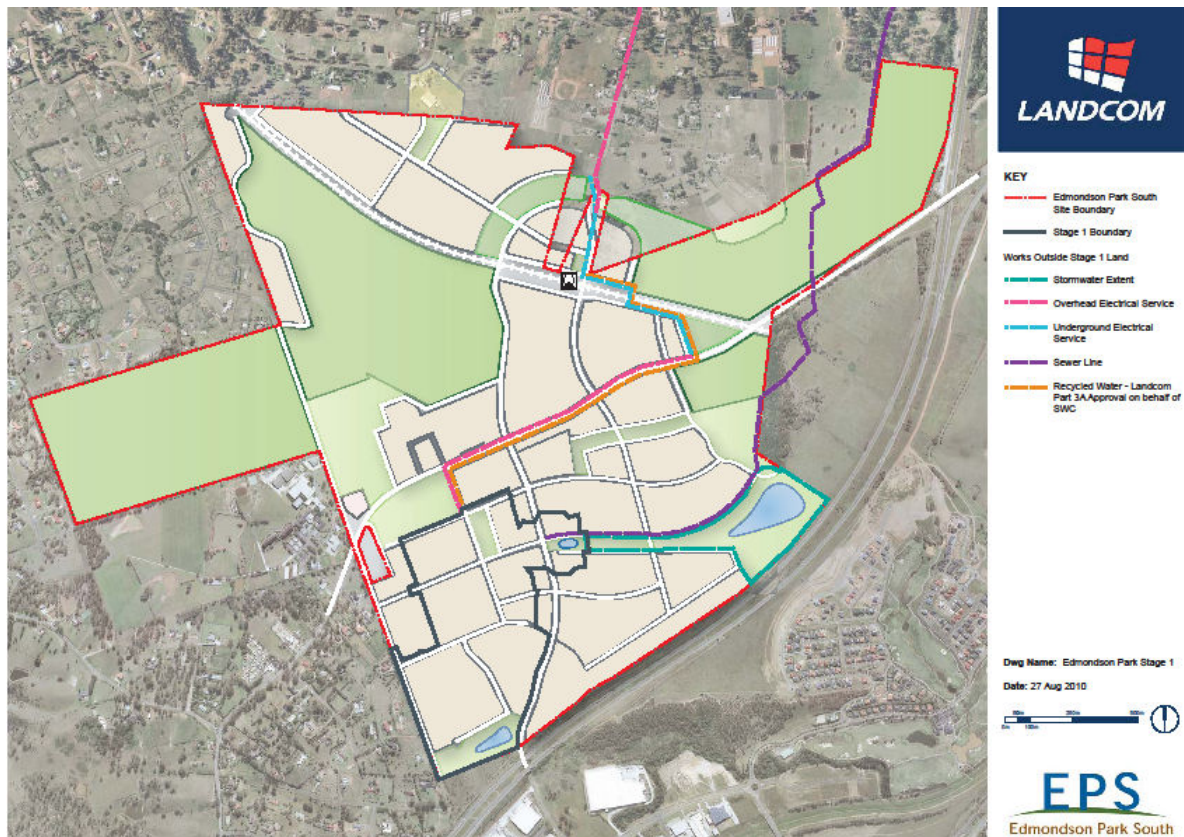


Figure 2: Location of Stage 1 Project Application

### Planning Background

The Edmondson Park Release Area, including the site, has been the subject of broad strategic planning investigation and environmental assessment over a number of years by Liverpool and Campbelltown City Councils, the Department of Planning, the Department of Defence (the current landowner of the Ingleburn Army Base) and Landcom (owner of certain lands).

The whole of the Edmondson Park Release Area has been released for urban development by the Minister for Planning. Part of the site; the Ingleburn Army Camp, is currently the subject of a 'delayed' rezoning for urban purposes under Liverpool Local Environmental Plan 2008 and Campbelltown (Urban Area) Local Environmental Plan 2002.

In June 2010 the Minister for Planning considered a Preliminary Assessment Report for the Edmondson Park South Project that provided justification for the planning, assessment and delivery of the project to occur under Part 3A of the EP&A Act, having regard to the demonstrated contribution that the project will have to achieving State and regional planning objectives.

Subsequently, on the 5 July 2010, pursuant to Clause 6 of SEPP Major Development, the Minister for Planning formed the opinion that the Edmondson Park South Project constitutes a Major Project to be assessed and determined under Part 3A of the EP&A Act, and also authorised the submission of a Concept Plan for the site. In doing so, the Minister also formed the opinion that a State significant site (SSS) study be undertaken to determine whether to list the site as a State Significant site in Schedule 3 of SEPP Major Development.

The Part 3A process under the EP&A Act allows for the Edmondson Park South Project to be planned, assessed and delivered in an holistic manner, with a uniform set of planning provisions and determination by a single consent authority.

This report has been prepared to fulfil the Environmental Assessment Requirements issued by the Director General for the preparation of a separate Environmental Assessment to accompany the first stage residential Project Application.

Specifically, this report addresses the following requirements:

*Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with Assessing Heritage Significance (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.*

The NSW Heritage Branch recommended inclusion of several requirements for cultural heritage, which include assessing the consistency of the proposal with recommendations including in several reports. The reports that consider European heritage are:

- Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001;
- Heritage Concepts Pty Ltd, South West Rail Link Environmental Assessment – Technical Paper 7; Preliminary Assessment of Historical Archaeological and Cultural Heritage Values, 2006 ;
- HLA Envirosciences, Non-Indigenous Heritage Assessment : Edmondson Pak, NSW 2003;
- AMBS, South West Rail Link – Glenfield to Leppington Rail Line : Historic Heritage Impact Assessment, 2010

#### **1.4 STRUCTURE OF THE STATEMENT OF HERITAGE IMPACT**

The statement follows the general structure set out in the *NSW Heritage Manual*, prepared by the NSW Heritage Office and the Department of Planning.

## 1.5 DEFINITIONS

The terms and definitions used in this report are as set out in the Australian ICOMOS Burra Charter for the Conservation of Places of Cultural Significance (1999) as follows:

**“Place** means site, area, land landscape, building or other work, group of buildings or other works, and may include components, contents, spaces and views.

**Cultural significance** means aesthetic, historic, scientific or social value for past, present or future generations.

**Fabric** means all the physical material of the place, including components, fixtures, contents, and objects.

**Conservation** means all the processes of looking after a place so as to retain its cultural significance.

**Maintenance** means the continuous protective care of the fabric and setting of a place, and its to be distinguished from repair. Repair involves restoration or reconstruction.

**Preservation** means maintaining the fabric of a place in its existing state and retarding deterioration.

**Restoration** means returning the exiting fabric of a place to a known earlier state by removing accretions or by reassembling existing components without the introduction of a new material.

**Reconstruction** means returning a place to a known earlier state and is distinguished from restoration by the introduction of materials (new or old) into the fabric.

**Adaptation** means modifying a place to suit the existing use or a proposed use.

**Use** means the functions of a place, as well as the activities and practices that may occur at the place.

**Compatible use** means a use which respects the cultural significance of the place. Such a use involves no, or minimal impact on cultural significance.

**Setting** means the area around a place, which may include the visual catchment.

**Related place** means a place that contributes to the cultural significance of another place.

**Related object** means an object that contributes to the cultural significance of a place but is not at the place.

**Associations** mean the special connections that exist between people and a place.

**Meanings** denote what a place signifies, indicates, evokes or expresses.

**Interpretation** means all the ways of presenting the cultural significance of a place.”

## 1.6 AUTHOR

This Statement of Heritage Impact has been prepared by Roy Lumby, heritage specialist of Tanner Architects and Megan Jones, Director of Tanner Architects.

**1.7 IDENTIFIED HERITAGE ITEMS**

Identified heritage items on the site are identified in the following table which is based on local government listings. Numbers refer to Figure 3:

:

Item	Description	Heritage Status
Mess Hall, Ingleburn Army Camp, Campbelltown Road, Edmondson Park (1)		Campbelltown Local Environmental Plan 2002 : National significance
Mont St Quentin Oval, including entry gates, Campbelltown Road, Edmondson Park (2)	The Mont St Quentin Oval, entry gates and flag pole are of historical significance. The oval served as the original parade ground for World War II troops.	Campbelltown Local Environmental Plan 2002; National significance.

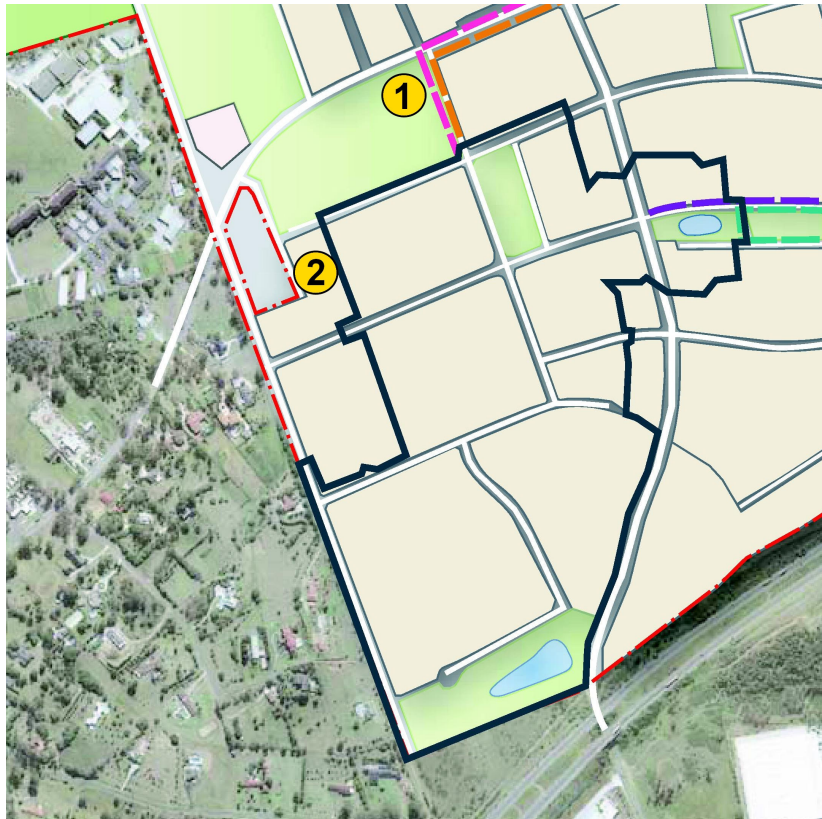


Figure 3: Location of heritage items near the Stage 1 Project Plan:

1. Mont St Quentin Oval and entry gates
2. Mess Hall

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## **2 HISTORICAL OVERVIEW**

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### **2.1 INTRODUCTION**

This section of the report draws on information contained in previous documents :

- Godden Mackay Logan, Ingleburn Defence Site – Heritage Analysis (June 2001) ;
- Heritage inventories for identified heritage items.

There were two major phases of construction on the site :

- 1939-1946 : provision of training facilities for World War II
- 1951 – 1959 : expansion of facilities for the Korean War and reintroduction of National Service training.

### **2.2 EARLY EUROPEAN HISTORY**

The former Ingleburn Defence site is located in an area that was originally known as Camden. Permanent settlement commenced during the early years of the nineteenth century. Explorer and naturalist George Caley passed through the district during 1807 ; in 1816 the first of four land grants that are incorporated into the Defence site was made to James Meehan, which was named Macquarie Fields. The other grants were Charles Parker’s “Parker’s Farm” (1817), Henry Kitchen’s “Claremont” (1819) and William Lily’s “Swaffham”. At this time transport links to Sydney were being constructed in the district after Governor Macquarie founded Liverpool in 1810 and Campbelltown in 1820.

During the 1880’s initial suburban development commenced in the locality around Ingleburn, but by 1906 it remained sparsely settled. During the early twentieth century the district around Campbelltown (which included Ingleburn) the principal industry was dairying, although it seems unlikely that the defence site was used for this purpose.

### **2.3 THE INGLEBURN DEFENCE SITE**

After the declaration of war on 3 September 1939 specifications were prepared for what was termed the “Ingleburn Military Camp”, which was to be first purpose-built army camp for training Australian infantry in World War II. The Army appears to have started occupying the site by October 1939 as its development as an embarkation camp commenced early that month. The Army did not acquire the land, some 277 hectares in extent, until 1940. Two hundred and fifty three buildings were initially erected to accommodate the newly formed 2<sup>nd</sup> AIF but not long after eighty more were constructed. The basic building unit was a prefabricated structure manufactured by Sydney Williams & Co, which had been manufacturing prefabricated buildings since the 1890s. Although primarily an infantry camp, Ingleburn served other Corps, including engineers, transport, signals and anti-aircraft units. It was also an assembly point for a number of Army brigades.

From 1945 to 1951, the years spanning the end of World War II and Australian participation in the Korean War, sections of land were leased to farmers. However, the onset of Australian involvement in the Korean War during 1950 caused changes to the use and the size of the camp. Another 46.5 hectares were acquired to the west of Zouch Road in 1951, followed by another 92.7 hectares tow years later, which land was subsequently sold. During the Korean War battalions destined for duty were stationed at the camp.

National Service, which had been in operation during World War II, was reintroduced in 1951 and y 1954 Ingleburn had become a major centre for the country’s National Service Program. The facilities within the camp had also expanded so that by 1959 a number of playing fields and larger buildings such as mess halls and training complex had been constructed while a large part of the married quarters (Ingleburn Village) had been built. The village consisted of imported pre-fabricated dwellings, Riley-Newsum cottages from Britain and Amals Sagverks Aktiebolag cottages from Sweden.

A kindergarten was established by wives of servicemen in 1952. Once again Sidney Williams prefabricated huts featured prominently albeit in a modified and more flexible form.

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**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

The main purpose of the Defence site between 1951 and 1972 was the training of National Service Recruits. It became a focus of public attention after compulsory military training was introduced by the Commonwealth in 1964 and conscripts were sent abroad to fight. After the abolition of National Service in 1972 the Defence site became headquarters of the Second Training Group of the Army Reserves.

In 1988 the administration of the Married Quarters, which included Ingleburn Village, was transferred to the Defence Housing Authority. Two years later almost 93 hectares to the north of the Bardia Barracks were sold to Landcom NSW. From the middle of the 1990's activity began to wind down and as buildings became vacant they were demolished. Further attrition resulted from vandalism and arson. In 2001 a core set of remaining buildings in the Bardia Barracks and a section of the site identified as Area G were proposed for a permanent memorial. This resulted in the listing of the Ingleburn Military Heritage Precinct by Campbelltown City Council.

Apart from this the Ingleburn Defence site has great social significance. It is a symbol of the service given by the generations of soldiers who trained here and as a place where respect for and remembrance of that service has is maintained. To the local community it is a landmark that symbolizes the important historical and contemporary role played by the Army within the area and as a place where links were forged between civilians and Army.

### **3 ASSESSMENTS OF SIGNIFICANCE**

The various heritage listings relating to the site contain assessments of heritage significance. The overall site and several components of it that are in the vicinity of the Stage 1 Project Application are listed as heritage items by the Commonwealth Government and Campbelltown City Council.

#### **3.1 AUSTRALIAN HERITAGE COUNCIL**

The Ingleburn Defence Site is listed in the Register of the National Estate, where it is identified as the Ingleburn Army Camp. It was registered on 28 October 2003.

The prefabricated cottages that were erected during the 1950s for married quarters are listed separately. The listing is also dated 28 October 2003.

#### **The Commonwealth Department of the Environment and Heritage Australian heritage Database:**

The Statement of Significance that is part of the inventory sheet in the Department's Australian Heritage Database for the Ingleburn Army Camp includes built items, flora and fauna. The following extract from the entry for the Army Camp is for built items only:

The Ingleburn Army Camp, one of Australia's major army camps from 1939-1970s, is of considerable historic significance as the first purpose-built infantry training camp for World War II. It played a central role in the mobilisation of Australia's citizens and in their military training throughout the war and was the assembly point for the first military contingent assembled for overseas service in the war.

Ingleburn Army Camp is also significance for its role in the training of personnel for the Korean and Vietnam Wars. The Army Camp was a major centre in Australia for training under the National Service Scheme (1951-1972) and it is also associated with the anti-conscription movement. The Army Camp also played a major role in the training of Army Reserves from 1973 through to the 1990s ...

Ingleburn Army Camp is of social significance as a symbol of the service given by generations of soldiers who trained there and as a place where respect for and remembrance of that service has become a continuing and highly valued tradition. It has social value to those who lived, and worked at the army camp. Ingleburn Army Camp has a long association with a State-wide "Army community", and is a place where this sense of community is expressed, celebrated and passed on. It also serves to symbolise to the community the role of the Army within the area ...

The Sydney Williams Type Barracks (1939-1946) have a strong historic association with the war effort mounted by Australia for World War II. The huts are able to demonstrate aspects of military life at the camp. The placement of the huts in rows enhances the visual impact of the group. The barracks form a major part of the memories of the site for those who have been accommodated in them ...

The Kitchen/Dining Hall Complex, c.1955, is historically significant for its association with the expansion of the camp as a training school after the Korean War and following the introduction of National service. It illustrates the scale of the former Training School operations and the dining needs of large numbers of troops at a permanent camp site. It represents the military practice of developing standardised building responses to needs associated with the support of a large number of army personnel. It is visually prominent due to its location, size and clerestory roof line. It contains moveable items such as crockery, furniture and kitchen appliances which illustrate its role.

The Lecture Hall building (former Recreation centre), 1953, is of historical significance for its role as a recreation centre erected specifically for National Service trainees of non-commissioned rank and as an education facility in its use as part of the Second Training Group Headquarters facility. Its provision reflects the self-containment characteristic of military organisations of the period. It is of social significance to National Servicemen as a former recreation facility and social centre and as a meeting place for army personnel. It is an example of architecture developed for military support

structures after World War II. This building uses an unusual combination of arch-frame and standard hut construction techniques and is important for demonstrating efficient structural and acoustic design qualities for multi-purposes use ...

The Bardia Barracks entrance precinct, comprising entrance gates, Guard House and Cell Block, Chaplain's Office and Post Office, is significant as a landmark for the local community symbolising the important role played by the Army in this area. The area symbolises the entry to army life, an event which was formative in the lives of many thousands of people who served at Ingleburn. The entry gates are associated with the establishment of military barracks on the site from 1939 and with Bardia Barracks in particular. The brick sentry boxes are symbolic of the military presence at the site ...

The Guard House and Cell Block are historically significant as part of Badia Barracks, with the Introduction of conscription and in particular, their use during the Vietnam War. It is a representative example of a guard house and cell block. The cells demonstrate aspects of defence force discipline ...

The Mont St Quentin Oval, entry gates and flagpole are of historical significance. The oval served as the original parade ground for WWII troops, and the location from which troops were formally farewelled and welcomed on return from service overseas ...

The Memorials located within the Ingleburn Military Heritage Precinct are historically significant, being associated with former military personnel and the regiments who have occupied the Army Camp. The memorials commissioned by particular regiments or organisations celebrate or commemorate the contribution made by a particular regiment or the military collectively to the war effort. The memorials have become the focus of commemoration and gatherings ...

The Australian heritage Database inventory listing for the Prefabricated Cottages of the Ingleburn Village nominates eight cottages as being significant. The following Statement of significance is included in the listing:

The group of three Riley-Newsum prefabricated cottages on the southern side of Bass Road illustrate the principal characteristics of the type in their original setting. As a group these cottages are important in illustrating the visual character of a village streetscape using the CA4 handed plans and varying setbacks, enhanced by a repetition of regular forms and design motifs including prominent gables, common fabric and uniform design creating a strong visual pattern on slopping terrain.

The five Amals Sagverks Aktiebolag (ASA) cottages in Flinders and Blaxland Road illustrate the principal characteristics and sitting of their type including three different siting options, together with the simple rectangular form, pitched gabled roof and external brick chimney. The single storey Riley Newsum and Amals Sagverks Aktiebolag cottages are set in a park like landscape with mature plantings of native trees which highlight the simple geometry and vernacular materials of the cottages, which contribute to the suburban character.

### **3.2 CAMPBELLTOWN CITY COUNCIL**

The Mess Hall, Ingleburn Army Camp and Mont St Quentin Oval, including entry gates are both included in Schedule 1 of Campbelltown (Urban Area) Local Environmental Plan 2002. The heritage study that includes these items has not been formally adopted by Campbelltown Council.

It should be noted that the department of defence is intending to demolish the Mess Hall. This Heritage Impact Statement, therefore, only addresses the potential impacts of the proposed Stage 1 Project Plan on the Mont St Quentin Oval and entry gates.

## **4 STATUTORY CONSIDERATIONS**

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### **4.1 NSW HERITAGE ACT 1977**

The NSW Heritage Act sets out the guidelines for the management of Heritage within NSW. The objects of this ACT are as follows:

- (a) *to promote an understanding of the State's heritage,*
- (b) *to encourage the conservation of the state's heritage,*
- (c) *to provide for the identification and registration of items of State heritage significance.*
- (d) *to provide for the interim protection of items of State heritage significance,*
- (e) *to encourage the adaptive reuse of items of State heritage significance,*
- (f) *to constitute the Heritage Council of New South Wales and confer on it functions relating to the State's heritage, and*
- (g) *to assist owners with the conservation of items of State heritage significance.*

Inclusion on the State Heritage Register provides legal protection as a heritage item under the NSW Heritage Act. Neither the former Ingleburn Army Camp site nor any individual items within it are listed in the NSW State Heritage Register.

### **4.2 DIRECTOR GENERAL'S REQUIREMENTS – PART 3A CONCEPT PLAN**

In accordance with Section 75F of the Environmental Planning and Assessment Act 1979, the Director General's Requirements for the subject site are outlined below.

Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with Assessing Heritage Significance (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.

### **4.3 CAMPBELLTOWN (URBAN AREA) LOCAL ENVIRONMENTAL PLAN 2002**

The Mess Hall at Ingleburn Army Camp and Mont St Quentin Oval, including entry gates, are included in Schedule 1 of Campbelltown (Urban Area) Local Environmental Plan 2002.

Division 2 of C(UA)LEP provides objectives and provisions relating to heritage conservation.

Division 2 Conservation of heritage items – 43 Objectives of the heritage provisions

The objectives of this part of the C(UA)LEP are stated as follows:

- (a) *to conserve the environmental heritage of the City of Campbelltown, and*
- (b) *to conserve the heritage significance of existing significant fabric, relics, settings and views associated with the heritage significance of heritage items and heritage conservation area, and*
- (c) *to ensure that archaeological sites and places of Aboriginal heritage significance are conserved, and*
- (d) *to allow for the protection of places which have the potential to have heritage significance but are not identified as heritage item, and*
- (e) *to ensure that the heritage conservation areas throughout the City of Campbelltown retain their heritage significance.*

**4.4 CAMPBELLTOWN (SUSTAINABLE CITY) DEVELOPMENT CONTROL PLAN 2009**

Section 2.11 of the DCP contains provisions for heritage conservation. Clause 2.11.2 relates specifically to non-indigenous heritage. Its Design Requirements are as follows:

- (a) *Any development application made in respect to development on land that is:*
- i) occupied by heritage item ; or
  - ii) adjoining land occupied by a heritage item ; or
  - iii) located within a heritage conservation area,
- shall have regard to the Articles of 'The Burra Charter' (published by Australia ICOMOC) and the provisions of any relevant Study or Conservation Management Plan.
- (b) *Any development on land occupied by an item of heritage, land in the vicinity of a heritage item or land located within a heritage conservation area shall be designed by a suitably qualified person.*
- (c) *A 'heritage impact statement' shall be submitted with a development application relating to land that is occupied by or directly adjoining a heritage item.*

**4.5 CAMPBELLTOWN CITY COUNCIL DEVELOPMENT CONTROL PLAN NO.83**

Campbelltown City Council Development Control Plan No. 83 is also known as the Heritage Policy. It has the following objectives:

- To assist in the conservation of Campbelltown's heritage items ;
- To encourage an awareness and understanding of local heritage conservation ;
- To provide incentives for the conservation of a heritage item ;
- To provide guidelines for the development, change and use of a heritage item ;
- To indicate when a development application is required ;
- To indicate when supporting information is required to accompany a development application.

## **5 PROPOSED WORK**

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### **5.1 DOCUMENTATION**

The scope of the proposed Stage 1 Project Plan has been documented by J Wyndham Prince and focuses on the subdivision and road design of a portion of the larger project site, to the south of Campbelltown Road. It includes :

- Layout and design of roads ;
- Subdivision of allotments arising from the road layout ; and
- Provision of an area of open space.

### **5.2 ARCHITECT'S DESCRIPTION**

The following description has been provided by Cox Richardson.

Precinct Concept and Distinguishing Characteristics :

The first stage of development will create an identity for Edmondson Park by developing a range of housing as well as open space. The Stage 1 area is located in the south wester portion of the Concept Plan area. It is located to the south of the Mont St Quentin Oval on the western side of the precinct to the south of Campbelltown Road. A local park will also be developed as part of this stage.

The key factors in deciding the location included:

- Good access from the existing MacDonald Road alignment ;
- A location that does not depend on either Campbelltown Road or MacDonald Road. This allows more detailed design work to be carried out on these important linkages ;
- The ability to allow the existing school to continue operation.

Urban Design Description:

The Stage 1 Project Application will include the following:

- A connector road running west from the existing MacDonald Road alignment. This street will include generous green verges as it will become an important link between the linear open space to the east and the park and conservation area to the west.
- The development of approximately 221 dwellings. A range of dwelling types to suit a range of income and demographic groups will be provided. This will include semi-detached and detached dwellings ;
- A local park

Transit-oriented, accessible and connected development :

- The street and path networks link the residential areas to the local park and oval. The street pattern is consistent with the overall Concept Plan ;
- The majority of dwellings will be within 400 metres of the proposed bus route ;
- Streets are designed to be pedestrian friendly, with footpaths on both sides of all streets, shading street trees and green verges. Generally streets are configured to terminate on open spaces to the north ;
- Higher density housing is located close to open space ;
- A hierarchy of roads and paths provide clear and convenient access links throughout the precinct and particularly to the bus route and open spaces;
- Public streets with good surveillance create a safer walkable community.

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**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

Landscape open space and community places:

- The new local park and existing ovals will create a community heart for the Stage 1 development. It will include a playground, cycle paths and safe lighting;
- The oval will include local district sporting facilities and associated amenities;
- Streets and open spaces are designed for formal and informal social engagement;
- A safe and secure environment is provided with high levels of passive surveillance of the public domain.

Heritage interpretation :

- There are no heritage items in the first stage. However, the Stage 1 development is adjacent to the Mont St Quentin Oval, which is listed as a heritage item and it is part of the former Ingleburn Defence site, which is also heritage listed.

Environmental Sustainability

- Temporary water quality basins will be constructed for Stage 1. This will be located so that existing vegetation can be kept.

**6 ASSESSMENT OF HERITAGE IMPACT**

**6.1 NSW HERITAGE OFFICE MODEL QUESTIONS**

The assessment of heritage impacts has been undertaken in reference to the model questions given in the NSW Heritage Office's publication *Statements of Heritage Impacts*. The relevance of the model questions to the proposed Part 3A Concept Plan is assessed in the following table:

Demolition of a building or structure	✓
Minor partial demolition	×
Major partial demolition	×
Change of use	×
Minor additions	×
Major additions	×
New development adjacent to a heritage to a heritage item	✓
Subdivision	✓
Repainting	×
Re-roofing/re-cladding	×
New Services	×
Fire upgrading	×
New landscape works and features	×
Tree removal or replacement	×
New signage	×

The Stage 1 Project Application consists of approximately 270 residential lots and 17 rural residential lots, with a building that will have a possible temporary use as a sales and information centre. Associated works include construction of the sewer lead in from the Sydney Water carrier main at Ash Road, demolition of structures, some tree removal, earthworks, and drainage, establishment of open space areas and subdivision for future residential lots, super lots and land for dedication.

This assessment of impact is not based on detailed building design through articulated building form, materials and finishes, but rather a subdivision layout.

**Demolition of a Building or Structure**

Q. Have all options for retention and adaptive reuse been explored?

A. *The Stage 1 Project Application consists of a street layout and subdivision plan. Any buildings or structures that may be demolished are not listed as heritage items.*

Q. Can all of the significant elements of the heritage item be kept and any new development be located elsewhere on the site?

A. *The Stage 1 Project application will not have an impact on the listed heritage items in its vicinity.*

Q. Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?

A. *This question is not applicable to the Stage 1 Project Application. Any demolition only relates to buildings that are not heritage items.*

Q. Has the advice of a heritage consultant been sought? Have the consultant's recommendations been implemented? If not, why not?

A. *Heritage issues have been discussed with Tanner Architects, heritage consultants. Cox Richardson developed the Concept Plan, of which the Stage 1 Project Application is a part, recognising places of heritage significance and the important sense of identity and interpretation that they will provide.*

### **New Development Adjacent to a Heritage Item**

Q. How is the impact of the new development on the heritage significance of the item or area to be minimised?

A. *The proposed Part 3A Concept Plan, which includes the State 1 Project Application, outlines indicative land uses and site work. It includes demolition of non-heritage dwellings, roads and construction of a small temporary sales office, which is located well away from the Mont St Quentin Oval. The Concept Plan also includes recommendations for a mix of dwelling types, ranging from single detached dwellings to attached dwellings and high density residential development. The potential impacts of future development in the Stage 1 Project on the neighbouring heritage item (the Mont St Quentin Oval), are restricted to attached dwellings and detached dwellings, thus providing control over height and bulk in the vicinity of the items.*

Q. Why is the new development required to be adjacent to a heritage item?

A. *The whole of the Edmondson Park Precinct has been released for urban development by the Minister for Planning. The former Ingleburn Army Camp forms part of the site and is the subject of a "delayed" rezoning by Liverpool City Council and Campbelltown City Council. The Concept Plan has been prepared to secure statutory approval for the overall planning framework for the site and to resolve several outstanding issues, and includes that section of the site that is the subject of the Stage 1 Project Application. The heritage items identified in the Campbelltown (Urban Area) Local Environmental Plan 2002 are an integral component of the Edmondson Park Precinct.*

Q. How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?

A. *It is anticipated that future Campbelltown City Council development controls will support the envelope of development documented in the Park 3A Concept Plan. The scale and form of permissible development in the envelope in the vicinity of the Mont St Quentin Oval will ensure that an appropriate curtilage is established to protect the heritage items and their setting within the development. The development controls described in the Part 3A Concept Plan will inform development in the Stage 1 Project Application.*

Q. How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?

A. *The principal public views of the heritage item – the Mont St Quentin Oval and gates – are currently available from Campbelltown Road. This heritage item is intended to act as a focal point for the Plan, providing a valuable interpretation device and community asset. Implementation of the Part 3A Concept Plan will have in the future a positive impact on views to these items, allowing them to be viewed from a variety of vantage points. It should be noted that both are integrated into the linked network of open space areas and corridors extending across the site, thus maintaining a sense of their relationship with the original open setting and the Defence site provided.*

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

Q. Is the development sited on any known, or potentially significance, archaeological deposits? If so, have alternative sites been considered? Why were they rejected?

A. *The proposed application is for a residential subdivision, which considers only indicative building controls. The former Ingleburn Army Camp as a whole is considered to have a very low potential for substantial sub-surface European Archaeological features (Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001, p.121). An Indigenous Archaeology report has been prepared for the Concept Plan application and should be referred to separately. At the time where the detailed applications are lodged for individual developments and buildings, the appropriate measures will be taken to ensure that any archaeological significance is adequately protected in line with the relevant Council local environmental plans and development control plans.*

Q. Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?

A. *The Stage 1 proposal is considered to be sympathetic to the Mont St Quentin Oval and its setting, providing a curtilage and controls over the type of development that will be permitted in its vicinity.*

Q. Will the additions visually dominate the heritage item? How has this been minimised?

A. *The Stage 1 Project Plan will have no immediate impact on the heritage item. The impact of future development will be minimised by application of the controls recommended by the Concept Plan and by future Campbelltown City Council planning instruments.*

Q. Will the public, and users of the item, still be able to view and appreciate its significance?

A. *The retention of the Mont St Quentin Oval and gates as discrete and unencumbered items within the site will ensure that the public can experience and appreciate the heritage items. The relationship of the item with the Ingleburn Military Heritage Precinct will be maintained, which will ensure that the public can understand the essence of their original relationships. The Oval and the Precinct have been carefully integrated into the open space planning of the overall site development and are a crucial component of this.*

**Subdivision**

Q. How is the proposed curtilage allowed around the heritage item appropriate?

A. *The curtilage around the Mont St Quentin Oval, which is defined by the layout of existing and proposed roads, will provide a defined boundary and a necessary amount of open space surrounding the item. The open space provided by the roads will be supplemented the type of residential development permitted by the Concept Plan and by Campbelltown City Councils' future building controls for Edmondson Park.*

Q. Could future development that results from this subdivision compromise the significance of the heritage item? How has this been minimised?

A. *No. The Concept Plan clearly identifies the type of development that will be permitted in the vicinity of the heritage item in the future.*

Q. Could future development that results from this subdivision affect views to, and form, the heritage item? How are negative impacts to be minimised?

A. *The retention of the Mont St Quentin Oval and gates as discrete and unencumbered elements within the site will ensure that the public can experience and appreciate the heritage item. It will be a key component of an interpretation strategy for the site. The relationship between the Oval and the Ingleburn Military Heritage Precinct will be maintained, which will ensure that the public can understand the essence of their original relationships. The Concept Plan clearly identifies the type of development that will be permitted in the vicinity of the heritage items in the future.*

**6.2 CAMPBELLTOWN (URBAN AREA) LOCAL ENVIRONMENTAL PLAN 2002**

The Minister for Planning is not bound by the provisions of Local Environmental Plans in relation to a major project in accordance with section 75R(3) of the Environmental Planning and Assessment Act 1979. The Minister may however take into account the provisions of an environmental planning instrument that would otherwise apply. Despite this, the Director General's general requirements require the proposal to address the planning provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002. The proposal has, therefore, been assessed against the relevant heritage requirements of the Campbelltown (Urban Area) Local Environmental Plan 2002:

<b>CAMPBELLTOWN (URBAN AREA) LEP 2002 REQUIREMENTS</b>	<b>COMPLIANCE COMMENTS</b>
<p><b>44. Protection of heritage items and heritage conservation areas</b></p> <p><b>44(1) When is consent required?</b></p> <p>The following development may be carried out only with development consent:</p> <ul style="list-style-type: none"> <li>(a) demolishing or moving a heritage item or a building, work, relic, tree or place within a heritage conservation area.</li> <li>(b) a heritage item or a building, work, relic, tree or place within a heritage conservation area by making structural or non-structural changes to its exterior, such as to its detail, fabric, finish or appearance,</li> <li>(c) altering a heritage item by making structural changes to its interior,</li> <li>(d) disturbing or excavating a place of Aboriginal heritage significance or an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed.</li> <li>(e) moving the whole or a part of a heritage item,</li> <li>(f) erecting a building on, or subdividing, land on which a heritage item is located or which is within a heritage conservation area.</li> </ul>	<p><i>This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Stage 1 Project Plan Application</i></p>
<p><b>44(4) What must be included in assessing a development application?</b></p> <p>Before granting a consent required by this clause, the consent authority must assess the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</p>	<p><i>This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Stage 1 Project Plan Application.</i></p>
<p><b>44(5) What extra documentation is needed?</b></p> <p>The assessment must include consideration of a heritage impact statement that addresses at least the following issues (but is not to be limited to assessment of these issues, if the heritage significance concerned involves other issues). The consent authority may also decline to grant consent until it has considered a conservation</p>	<p><i>This Heritage Impact Statement provides and evaluation of the impacts of the proposal on the significance of the heritage item concerned.</i></p>

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

<b>CAMPBELLTOWN (URBAN AREA) LEP 2002 REQUIREMENTS</b>	<b>COMPLIANCE COMMENTS</b>
<p>management plan, if it considers the development proposed should be assessed with regard to such a plan.</p> <p>The minimum number of issues that must be addressed by the heritage impact statement are:</p> <p>(a) for development that would affect a heritage item:</p> <ul style="list-style-type: none"> <li>(i) the heritage significance of the item as part of the environmental heritage of the City of Campbelltown, and</li> <li>(ii) the impact that the proposed development will have on the heritage significance of the item and its setting, including any landscape or horticultural features, and</li> <li>(iii) the measures proposed to conserve the heritage significance of the item and its setting, and</li> <li>(iv) whether any archaeological site or potential archaeological site would be adversely affected by the proposed development, and</li> <li>(v) the extent to which the carrying out of the proposed development would affect the form of any historic subdivision.</li> </ul>	<p><i>(i) The Proposal will ensure the conservation of the Mont St Quentin Oval and gates.</i></p> <p><i>(ii) The proposal will allow the Mont St Quentin Oval to be conserved and enhanced by means of integrating the item into the overall development of Edmondson Park and celebrating its heritage significance.</i></p> <p><i>(iii) The #A Concept Plan provides a curtilage for the Mont St Quentin Oval and a recommendation for the type of development in its vicinity</i></p> <p><i>(iv) It is understood that the I of the former Ingleburn Army Camp has low archaeological potential. The proposal consists of a subdivision plan, which will not require any site disturbance.</i></p> <p><i>(v) The Ingleburn Defence site, including the subject site, was not part of a historic subdivision.</i></p>
<p>48 Development affecting known or potential archaeological sites of relics of non-Aboriginal heritage significance</p> <p>(1) Before granting consent for development that will be carried out on an archaeological site or a potential archaeological site of a relic that has non-Aboriginal heritage significance (whether or not it is, or has the potential to be, also the site of a relic of Aboriginal heritage significance), the consent authority must:</p> <ul style="list-style-type: none"> <li>(a) consider a heritage impact statement explaining how the proposed development will affect the conservation of the site and any relic known or reasonably likely to be located at the site, and</li> <li>(b) be satisfied that any necessary excavation permit required by the Heritage Act 1977 has been granted.</li> </ul> <p>(2) This clause does not apply if the proposed development:</p> <ul style="list-style-type: none"> <li>(a) does not involve disturbance of below-ground</li> </ul>	<p><i>Impacts relating to Aboriginal heritage are the subject of a separate specialist consultant's report.</i></p> <p><i>It is understood that the site of the former Ingleburn Army Camp has low non-Aboriginal archaeological potential. The proposal consists of a subdivision plan, which will not require any site disturbance.</i></p> <p><i>The detail of future development and its likely impacts are not required to be resolved at this concept stage.</i></p>

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

<b>CAMPBELLTOWN (URBAN AREA) LEP 2002 REQUIREMENTS</b>	<b>COMPLIANCE COMMENTS</b>
<p>deposits and the consent authority is of the opinion that the heritage significance of any above-ground relics would not be adversely affected by the proposed development, or</p> <p>(b) is integrated development.</p>	
<p>49 Development in the vicinity of a heritage item</p> <p>(1) Before granting consent to development in the vicinity of a heritage item, the consent authority must assess the impact of the proposed development on the heritage significance of the heritage item and of any heritage conservation area within which it is situated.</p> <p>(2) This clause extends to development:</p> <p>(a) that may have an impact on the setting of a heritage item, for example, by affecting a significant view to or from the item or by overshadowing, or</p> <p>(b) that may undermine or otherwise cause physical damage to a heritage item, or</p> <p>(c) that will otherwise have any adverse impact on the heritage significance of a heritage item or of any heritage conservation area within which it is situated.</p> <p>(3) The consent authority may refuse to grant any such consent unless it has considered a heritage impact statement that will help it assess the impact of the proposed development on the heritage significance, visual curtilage and setting of the heritage item.</p> <p>(4) The heritage impact statement should include details of the size, shape and scale of, setbacks for, and the materials to be used in, any proposed buildings or works and details of any modification that would reduce the impact of the proposed development on the heritage significance of the heritage item.</p>	<p><i>Refer to the response to the NSW Heritage Office Model Questions in Section 6.1 above. This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed State 1 Project Plan Application.</i></p> <p><i>The Park 3A Concept Plan provides indicative controls only for the subject site.</i></p>

**6.3 DEVELOPMENT CONTROL PLANS**

The Minister for Planning is not bound by the provisions of the Local Environmental Plans in relation to a major project in accordance with section 75R(3) of the Environmental Planning and Assessment Act 1979. The Minister may however take into account the provisions of an environmental planning instrument that would otherwise apply. Despite this, the Director General's general requirements require the proposal to address relevant statutory provisions, which include the provisions of the Campbelltown (Sustainable City) Development Control Plan 2009 and Campbelltown City Council Development Control Plan No. 83.

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

**CAMPBELLTOWN (SUSTAINABLE CITY) DEVELOPMENT CONTROL PLAN 2009**

Clause 2.11 of the DCP contains provisions for heritage conservation.

CAMPBELLTOWN (SUSTAINABLE CITY) DCP 2009	COMPLIANCE COMMENTS
<p><b>2.11.2 Non-Indigenous Heritage</b></p> <p>Design Requirements</p> <p>(a) Any development application made in respect to development on land that is:</p> <ul style="list-style-type: none"> <li>(i) occupied by a heritage item; or</li> <li>(ii) adjoining land occupied by a heritage item, or</li> <li>(iii) located within a heritage conservation area</li> </ul> <p>shall have regard to the Articles of 'The Burra Charter' (published by Australia ICOMOS) and the provisions of any relevant Study or Conservation Management Plan.</p> <p>(b) Any development on land occupied by an item of heritage, land in the vicinity of a heritage item or land located within a heritage conservation area shall be designed by a suitably qualified person.</p> <p>(c) A 'heritage impact statement' shall be submitted with a development application relating to land that is occupied by or directly adjoining a heritage item.</p>	<p><i>(a) The Stage 1 Project Plan is in the vicinity of the Mont St Quentin Oval and gates. The overall Part 3A Concept Plan, of which the Stage 1 Project Plan is a part, integrates the Mont St Quentin Oval into the overall development.</i></p> <p><i>(b) The Part 3A Concept Plan was designed by the firm of Cox Richardson Architects, which has wide experience in Urban Planning that includes heritage listed sites.</i></p> <p><i>(c) This Heritage Impact Statement is provided to assist the Consent Authority in its consideration of the proposed Stage 1 Project Plan Application.</i></p>

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

Part 3 of the DCP contains heritage guidelines.

CAMPBELLTOWN CITY COUNCIL DEVELOPMENT CONTROL PLAN No. 83: HERITAGE POLICY	COMPLIANCE COMMENTS
<p><b>Assessment</b></p> <p>A development application must be prepared in accordance with the conservation guidelines <i>The Burra Charter</i> and <i>The Conservation Plan</i>.</p>	<p><i>This Statement of Heritage Impact has been written in conformity with the general structure set out in the NSW Heritage Manual, prepared by the NSW Heritage Office and the Department of Planning</i></p>
<p><b>Design Principles and Elements</b></p> <p>The design of any proposed development should not lessen the significance of a heritage item. New development should be compatible and complementary.</p> <p>Design principles to be considered include:</p> <ul style="list-style-type: none"> <li>• the use of recessive/neutral elements so as the significance of a heritage item is retained and enhanced.</li> <li>• the recognition of architectural and landscape elements (style and design)</li> <li>• the interpretation of architectural and landscape elements, where appropriate, in a modern way.</li> <li>• the views to and from the site.</li> <li>• the streetscape.</li> <li>• the creation of a sense of place.</li> </ul> <p>Design should not:</p> <ul style="list-style-type: none"> <li>• detract from or compete with the significance of a heritage item.</li> <li>• compete for visual attention.</li> <li>• obscure the significance of a heritage item.</li> <li>• generally mimic/copy architectural style/design.</li> <li>• overdevelop the site.</li> </ul>	<p><i>The Stage 1 Project Plan describes an indicative road layout and future uses across the site, along with the construction of a small temporary sales office.</i></p> <p><i>The design principles are not applicable because the sales office is located well away from the Mont St Quentin Oval and gates. The building is contemporary in design, with a restrained and well resolved aesthetic expression</i></p>
<p><b>Subdivision and Residential Development</b></p> <p>Often heritage items are located on large blocks of land or are part of new urban areas. Where subdivision or residential development is proposed, a suitable curtilage must be identified for the heritage item in a Conservation Plan before any residential area is nominated for development. In assessing a suitable curtilage, the significance of a heritage item must not be compromised.</p>	<p><i>A Conservation Plan has not been prepared. However, the Concept Plan provides an appropriate curtilage for the Mont St Quentin Oval, which has been adopted in the Stage 1 Project Application. The Oval will contribute to interpretation of the heritage significance of the site and will continue to be used in an appropriate manner.</i></p>

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## **7 DIRECTOR GENERAL'S REQUIREMENTS AND HERITAGE BRANCH REQUIREMENTS**

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### **7.1 DIRECTOR GENERAL'S REQUIREMENTS**

The Director General's Requirements are:

*Identify and assess the impacts of the proposal on the heritage significance of the area in accordance with Assessing Heritage Significance (NSW Heritage Office 2001), including on the Ingleburn Army Camp, prefabricated cottages, and Mont St Quentin Oval and entry gates. Identify opportunities for adaptive re-use of heritage items.*

It should be noted that the document Assessing Heritage Significance (NSW Heritage Office 2001) provides guidelines for the evaluation and assessment of the potential heritage significance of items. In the case of the former Ingleburn Defence Site the heritage significance of the place and individual components within its boundaries have already been assessed. Assessments include the Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001 and the Register of the National Estate and local government listings for the place.

This Statement of Heritage Impacts has followed the guidelines set out in the NSW Heritage Office's publication Statements of Heritage Impacts, which provides model questions to assist in determining what impacts a development may have on a heritage item or place.

This Statement of Heritage Impact has addressed the Director General's requirements for heritage as follows:

- This Statement of Heritage Impact provides a detailed evaluation of any impacts that the development may have on the significance of the site.
- The findings of this assessment conclude that the proposed Stage 1 Project Plan for Edmondson Park demonstrates compliance with the Heritage Act 1977, the heritage impact assessment guidelines published by the NSW Heritage Office and the heritage provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002. There is also compliance with the relevant Development Control Plans.

The Stage 1 Project Plan provides opportunities for the adaptive reuse of heritage items:

- The Mont St Quentin Oval has been integrated into the design of the site and is an important component of public open space. Its use as a park and oval is appropriate, while the visual connections between the Oval and the Ingleburn Military Heritage precinct are to be maintained.

### **7.2 HERITAGE BRANCH REQUIREMENTS**

The NSW Heritage Branch recommended inclusion of several requirements for cultural heritage, which include assessing the consistency of the proposal with recommendations included in several reports. The reports that consider European heritage are:

- Godden Mackay Logan, Ingleburn Defence Site Heritage Analysis, June 2001;
- Heritage Concepts Pty Ltd, South West Rail Link Environmental Assessment – Technical Paper 7: Preliminary Assessment of Historical Archaeological and Cultural Heritage Values, 2006;
- HLA Envirosiences, Non-Indigenous Heritage Assessment: Edmondson Park, NSW 2003;
- AMBS, South West Rail Link – Glenfield to Leppington Rail Line: Historic Heritage Impact Assessment, 2010.

The NSW Heritage Branch has also asked for:

- A detailed heritage Interpretation Strategy and specific site works proposed throughout the precinct to implement interpretation of the Ingleburn Army Camp, to be prepared and submitted for comment by the Heritage branch before commencement of construction;

- An assessment of the suitability of the Ingleburn Army Camp (or part of it) for nomination and listing on the NSW State Heritage register to be provided to the Heritage Branch prior to commencement of construction.

### **Godden Mackay Logan: Ingleburn Defence Site Heritage Analysis June 2001**

This report was commissioned by the Department of Defence Major Property Disposal Unit to assist in future planning.

The NSW Heritage Branch requires assessment of the consistency the proposal with the significance assessment and conservation policies contained in this document, along with investigation of any opportunities for adapt reuse of the Ingleburn Army Camp (or part of it) including its functions, layout and setting and interpretation of its former defence uses in relevant parts of the precinct.

Section 7.45 of the Ingleburn Defence Site Heritage Analysis consists of a Summary Statement of Significance for the Defence Site:

*The Ingleburn Defence Site, which was, from 1939 to the 1970s, one of Australia's major army camps, is a place of considerable historic significance. The site played a central role in the mobilisation of Australia's citizens and their military training throughout World War II and was the first purpose-built infantry training camp for World War II. It was the assembly point for the first military contingent assembled for overseas service in World War II and is associated with training for the Korean and Vietnam Wars and the anti-conscription movement.*

*Ingleburn Defence site is of social significance as it is a symbol of the service given by the generations of soldiers who trained here and as a place where respect for and remembrance of that service has become a continuity and highly valued tradition.*

*Or several generations of NSW men, and a smaller number of women, Ingleburn Defence Site is of social significance as a place that was formative in their lives, shaping their values and outlook. It is a place with long associations with a State-wide 'Army community', and is a place where this sense of "Army community" is expressed, celebrated and passed on.*

*Ingleburn Defence site is of social significance for the local community as a landmark that symbolises the important historical and contemporary role played by the Army within the area and as a community meeting place, where links were forged between civilians and Army.*

*The remaining buildings on the Ingleburn Defence Site are representative examples of standardised barracks and support structures, which were erected in rapid response to the training demands of World War II.*

*Remnant bushland within the Ingleburn Defence Site includes rare surviving Cumberland Grey Box Woodland, a plant community of high scientific significance.*

The Heritage Analysis Report recommended the establishment of the Ingleburn Military Heritage Precinct, which "is intended to act as a National Memorial, to provide a focus for memorial and commemorative days, to cater for private visits and community use, to provide a point of focus of the site and to help to establish a site development theme."

The Heritage Analysis report evaluated the heritage significance of the elements (including buildings) that then existed across the Defence Site. Many of these have since been demolished.

### **Section 9.3: Significance Management Guidelines**

This part of the report recommended that items of exceptional significance should be retained and conserved by appropriate zoning and management. The items that may be affected by the Stage 1 Project Plan are the Mont St Quentin Oval and entry gates and the Mont St Quentin Mess and Dining Hall Complex, which are not in the Stage 1 Project Plan area but are in close proximity to it. The Mont St Quentin Oval and gates have been given a significance ranking of high. The report recommends that items of high significance should be retained and conserved in their current location. If retention is not feasible they should be archivally recorded prior to any disturbance. The Mont St Quentin Mess Hall and Dining Complex has been ranked as having some significance. The report recommends that items with this ranking should be considered for retention according to their particular circumstance or archivally recorded prior to removal.

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

The Department of Defence is intending to demolish this item. The proposed demolition does not form part of the Stage 1 Project Application.

Cottages in the area of site defined by the Stage 1 Project Plan have been identified as having low significance. A number have been demolished since the report was completed.

Section 9.4 contains guidelines for individual items. Compliance with the relevant guidelines is summarised below:

Management Guideline	Response
<p>9.4.1 Site structure, Layout and Names</p> <p>The site structure and layout of the Ingleburn Defence site can best be retained through retention and incorporation of existing roads and major landscape elements into future site use proposals. ... The primary objective should be that the place should still be identifiable and “familiar” for those to whom it is important.</p>	<p>Whilst the design of the Concept Plan precludes retention of some existing roads, important features such as the Ingleburn Military Heritage Precinct and the Mont St Quentin Oval are integrated into the proposal. These significant features embody commemoration of the site’s important historical associations and provide identity.</p>
<p>9.4.9 Bambi Kindergarten</p> <p>The memorial at the Bambi Kindergarten should be conserved in its present location, or relocated in association with the other memorials.</p> <p>Future decisions about the Bambi Kindergarten as an activity and community facility will be subject to the commercial viability of the activity. However, retention of the name ‘Bambi Kindergarten’ in association with this activity in the Ingleburn area would be desirable.</p>	<p>The Korean War memorial, which is near the Kindergarten, is to be relocated to the Ingleburn Military Heritage Precinct.</p> <p>The retention of the name ‘Bambi Kindergarten’ should form part of the interpretation strategy for the site and its use should be encouraged for a pre school facility within the site.</p>
<p>9.4.10 Former Parade Ground and Playing Fields</p> <p>The Mont St Quentin Oval, including its entry gates and flagpole position, should be retained. The visual character of the oval should be interpreted (ideally by return of memorial plaques to their original position). The name ‘Mont St Quentin’ should be retained.</p>	<p>The Mont St Quentin Oval is to be retained and conserved. It forms an important component of the open space design in the Concept Plan for Edmondson Park, which retains the visual link between it and the Ingleburn Military Heritage Precinct.</p> <p>It is recommended that the name is retained as part of the interpretation strategy for the place.</p>
<p>9.4.12 Representative Buildings</p> <p>... Specifically, it is suggested that at least two examples of Sydney Williams Barracks and one Kitchen/Dining Hall complex be retained.</p>	<p>The Kitchen/Dining Hall is to be demolished by the Department of Defence. The proposed demolition does not form part of this application.</p>
<p>9.4.13 On-Site Interpretation</p> <p>The history and significance of the Ingleburn Army Camp should be interpreted at the Ingleburn defence site, once it is vacated by the Department of Defence. Interpretation should recognise the historic significance of the place and could be in a simple form (such as a plaque) or a more complex medium such as an exhibition or museum.</p>	<p>The Mont St Quentin Oval and entry gates are intended to form an important component of the interpretation strategy for the overall site.</p>

**Heritage Concepts Pty Ltd, South West Rail Link Environmental Assessment – Technical Paper 7: Preliminary Assessment of Historical Archaeological and Cultural Heritage Values, 2006**

This report was commissioned to undertake a historic archaeological and cultural heritage assessment of the impacts associated with the proposed South West Rail Link. The NSW Heritage Branch requires assessment of the consistency the proposal with the recommendations contained in this document.

Section 6.0 of the report is a Preliminary Statement of Heritage Impacts. Identified impacts on built elements of what was termed the Ingleburn Military Area north and south of Campbelltown Road include:

- Potential impact resulting in the loss of military landscaping and planning relating to the domestic/residential life of army dependants;
- The possible loss of examples of building types associated with military married quarters;
- Visually the South West Rail Link would have a major indirect impact on the aesthetic qualities of the area.

The 3A Concept Plan has the same potential heritage impacts.

Section 7.0 of the report contains Assessment and Mitigation recommendations. The Assessment recommendations are not applicable to the Part 3A Concept Plan that is the subject of this report. However, certain mitigation recommendations may be applicable.

Management & Mitigation Recommendation	Response
Proposed work with the potential to impact upon the former Ingleburn Military Camp should refer to the relevant policies and procedures outlined in the Ingleburn Defence Site Heritage Analysis (Godden Mackay Logan 2001)	Refer to the previous section of this report
A referral will be submitted if required for the Commonwealth listed former Ingleburn Military Camp.	This recommendation is not considered appropriate.

**HLA Envirosciences, Non-Indigenous Heritage Assessment: Edmondson Park, NSW, 2003**

HLA-Envirosciences Pty. Ltd was commissioned by Liverpool City Council on behalf of Campbelltown City Council and other landowners to undertake a study on Non-Indigenous Heritage. The NSW Heritage Branch requires assessment of the consistency the proposal with the recommendations contained in this document.

The assessment of heritage significance for the study area in the report drew on the evaluation of the Godden Mackay Logan (GML) 2001 Heritage Analysis. Section 5 of the report contains management guidelines and a Conservation strategy for the Ingleburn Army Camp is outlines in Section 5.3. The relevant sections of Section 5 are considered below.

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

Conservation Strategy Clause	Response
<p><b>5.3.1 Objectives</b></p> <p>At the Ingleburn Army Camp, the GML report identified an area containing National Estate values relating to non-natural heritage, which encompassed part of the Bardia Barracks, Mont St Quentin Oval and a representative Mess Hall/Dining Hall (shown on GML 2001 Figure 9.1). This was later defined as the Ingleburn Military Heritage Precinct and added to the Interim list of the Register of National Estate. Similarly the Ingleburn Village was added to the Interim list of the Register of National Estate.</p> <p>However, it is important to understand that the whole Ingleburn Army Camp was assessed as having high heritage significance but that much of the heritage outside the listed areas is expressed through associations with historical events and social significance rather than through the extant physical fabric.</p> <p>Taking this into account there are three broad conservation objectives that can be developed:</p> <ul style="list-style-type: none"> <li>• Conservation of key items of the physical fabric within the Ingleburn Military Heritage Precinct.</li> <li>• Conservation of the physical fabric of examples of the prefabricated cottages at Ingleburn Village.</li> <li>• Development of unique design vocabulary that refers in some way to the history and memories of the broader site, the Ingleburn Army Camp and maintains the sense of the area being different.</li> </ul>	<p>The Godden Mackay Logan report considered that the Mont St Quentin Oval and entry gates were an important element associated with the Ingleburn Military Heritage Precinct (refer to Section 10 of the Ingleburn Defence Site Heritage Analysis, June 2001). The Stage 1 Project Plan does not impact on or obscure the relationship between the Precinct and the Oval.</p> <p>The other two objectives are not applicable to this application.</p>

**STATEMENT OF HERITAGE IMPACT**  
**EDMONDSON PARK SOUTH PART 3A-PROJECT PLAN APPLICATION**

Conservation Strategy Clause	Response
5.3.2 Development Provisions	
<p>5.3.2.1 Ingleburn Military Heritage Precinct</p> <p>The objective is to conserve and interpret key items of the significant fabric within the Ingleburn Military Heritage Precinct to ensure its long-term survival for current and future generations.</p> <p>The key to achieving this aim is to encourage active use of the precinct that acts to generate ongoing maintenance of the buildings and structures on their sites but does not impact on the significance of the precinct.</p> <p>The Mont St Quentin Oval could be used as a sports venue. It is likely that some facilities may be needed to support the use of the oval such as change rooms, fences and the like. The design of these should reflect the previous and existing buildings at Ingleburn in terms of their scale, proportion, shape, materials and colour although obviously in a modern form. There would be no objection if a building from an area outside the two heritage areas is moved to the Mont St Quentin Oval to act as a facility such as change rooms, as there is ample precedent from other military sites where this occurred and the buildings were after all designed to be relatively portable.</p>	<p>The Mont St Quentin Oval is an important component of the Concept Plan and has been identified as a strategic park. It has been integrated into the planning of open space throughout the site. The Stage 1 Project Plan does not vary this intention. Any buildings associated with recreational use at the Oval would be the subject of a future, separate application.</p>
<p><b>5.3.2.3 Remaining areas of the Ingleburn Army Camp</b></p> <p>The objective is the development of unique design vocabulary that refers in some way to the history and memories of the broader site and maintains the sense of the area being different significance.</p> <p>The GML report notes that the site structure and general layout of the site and names of streets and precincts is an important part of the significance of the Ingleburn site (GML 2001.99, 103). The development objective would be to retain the link between the use of the site as the Ingleburn Army Camp and proposed new uses by making sure that:</p> <ul style="list-style-type: none"> <li>• Street patterns are maintained as much as possible (although new streets could be added).</li> <li>• Names of streets and localities are to be maintained and new names have a reference to the past use of the site.</li> </ul>	<p>It will not be possible to maintain existing street layouts. However, devices such as street names and place names that make specific reference to the history and uses of the site will provide interpretation that is integral to the site.</p>

**AMBS, South West Rail Link – Glenfield to Leppington Rail Line: Historic Heritage Impact Assessment, 2010**

The study area addressed by this report, which was prepared by Australian Museum Business Services, included the Ingleburn Defence site. Impacts on Campbelltown Road and Ingleburn Village are identified inspection 5.3.2 of the report. A significant impact on the form and layout of Ingleburn Village as a whole and an adverse impact on the historic, aesthetic and rarity values of the Riley Newsum and Amals Sagverks Aktieborg prefabricated cottages as integral elements of the village is identified, arising from the Rail Link footprint on the Defence site.

Section 6 of the report contains mitigation recommendations, several of which may be applicable to the Stage 1 Project Plan.

<b>Recommendation</b>	<b>Consistency with recommendation</b>
<p><i>Recommendation 5</i></p> <p><i>Consideration should be given to a meaningful interpretation of the local history and land use patterns, significant people and places and the development of transportation networks and introduction of utilities ...</i></p>	<p>A heritage interpretation strategy will be prepared for the entire site (not only the Stage 1 Project Plan) prior to the commencement of construction. It is anticipated that the Mont St Quentin Oval and entry gates will be integrated into the interpretation strategy.</p>
<p><i>Recommendation 9</i></p> <p><i>Should relics be exposed during the Project construction process, work will halt at that location. The nominated excavation director should be called in to assess and determine the appropriate management strategy for the relics. Care should be taken in the establishment and post work rehabilitation of stockpile areas to avoid disturbing potential relics.</i></p>	<p>Archaeological supervision should be established at the time that work on the sites commences. There is some construction work associated with the Stage 1 Project Application, including the demolition of non-heritage listed cottage, roads and the erection of a small temporary sales office building..</p>

**8 CONCLUSION**

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This report concludes that the proposed Part 3A Project Plan Application for Edmondson Park demonstrates compliance with the Heritage Act 1977, and the Director General's Requirements including the heritage impact assessment guidelines published by the NSW Heritage Office, the heritage provisions of the Campbelltown (Urban Area) Local Environmental Plan 2002 and the requirements of the NSW Heritage Branch.

The Part 3A Project Plan Application will not have an impact on the Mont St Quentin Oval and entry gates, which are key elements of the Concept Plan. The Oval is adjacent to the Project Plan area but does not form part of it.