



Submission - Middle Head Precinct
Sydney Harbour Federation Trust
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Response to the Draft Amendment to the Management Plan and to the Development Application

The Mosman Parks & Bushland Association appreciates the opportunity to respond to the Aged Care Facility Proposal at Middle Head.

The Aims & Objectives of Mosman Parks and Bushland

- To resist the destruction and alienation of Mosman's bushland, parks and pockets of public open space
- To protect the integrity and biodiversity of the native flora by promoting bush regeneration in Mosman
- To advocate good principles of town planning especially insofar as they impact on bushland, parks and public open space

The Public Interest

Fundamental to these aims is the belief that urban bushland and foreshore bushland have a public benefit. MPBA aims to preserve open space for the benefit of the public, present and future, local and broader, recognizing its increasing importance as population density increases.

A World Class National Park for All Australians at Middle Head & Georges Heights

When the Headland Preservation Group wound up in 2012 its members were assured that Mosman Parks & Bushland would attempt to keep watch over the Headland to maintain the original vision of the Headland Preservation Group.

Aged Care Proposal at Middle Head and the Trust's need to be self supporting: The Harbour Trust is expected to be economically self sustaining and the desirability of its being so is understood. The Association has been sympathetic to the Trust in its aim to be self funding now and into the future. The Trust's response to the Aged Care proposal, which, all going well, would provide the necessary funding for the remediation of the red brick Ten Terminal building and the Barracks

buildings as well as ongoing income from leasing the buildings is understandable.

PROPOSAL NOT SUPPORTED

However, the proposal is not supported for the following reasons:

Not the original vision: It is not part of the original vision for a world class park - either the vision of those who campaigned to save the lands or the objects expressed in the SHFT Act.

Open Space: It diminishes rather than conserves public open space.

Heritage: The significant expansion of the buildings changes the heritage character of the Middle Head Precinct.

Scale of the development: The proposed demolition of the three Barracks Buildings and their replacement with a single large building is of particular concern. We understand that the height will be lower than the height of the current structures, but the larger footprint and uninterrupted bulk of the replacement building diminish rather than enhance the view to the harbour.

The length of the lease: The proposed length of the lease goes beyond the expiry of the Trust's life. The SHFT Act states that this would necessitate written approval from the Minister. There is concern that at the end of the lease it could be difficult for the Trust to refuse requests for further concessions.

The site becomes vulnerable to reuse for standard residential development: At the end of the lease or before, there could be pressure to modify the use of the buildings. Pressure to convert the use from aged care to apartments is a possibility that should be anticipated. Aged care residencies may *seem* benign, but there is an inherent danger that one residential use may lead to another far less acceptable residency especially given the costs of the current development.

A new building: To all intents and purposes, the building which replaces the three barracks buildings is a NEW building. The Harbour Trust's Comprehensive Plan allows new buildings under certain circumstances, but states that the primary objective of the Trust is conservation rather than development. The Plan lists some circumstances in which the Trust

could consider the construction of new buildings. The Association considers that the driver behind the construction of this building is commercial necessity rather than the achievement of desirable outcomes as listed in the Plan.

Precedent: A precedent is being set for further similar developments. Although this is not the first new building or replacement building constructed on Harbour Trust land, considerable alarm has been expressed as to the ease with which a Precinct Plan can be altered and a larger scale development achieved.

Further comments:

Public Trust: the Trust has an admirable record of consulting the public and taking community opinion into consideration. It has garnered much goodwill for its visionary achievements in putting into practice the ideals for the lands in its care. This project appears to many, as a break with that vision and is creating public anxiety for the future. "Trusting the Trust" is in danger.

Need for financial viability of proposal to be absolutely certain: Given the public disquiet, any financial difficulty affecting the development would be a disaster. If the Trust did not receive what is expected from the financial arrangements the diminishment of former principles regarding use of the land would have been in vain.

The following comments DO NOT EXPRESS SUPPORT for an Aged Care Facility at Middle Head.

Need for public tender: If the buildings *are* to be used as a nursing home and respite day care centre, then this option should be put out to public tender to see whether other nursing home operators are interested in the site and the use the buildings. Given the lack of experience and track record in the development and operation of nursing homes by the current proponents, there are significant risks to the Trust from entering into a 25 year relationship with these operators. It would be preferable and more transparent if the proposal were put to tender and a rigorous evaluation of all options considered.

Need for strong conditions: If the trust determines to approve the proposal, strong conditions need to be imposed in both the lease and conditions of approval which clearly mandate that:

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- Public access to all but a minimal portion of the land be maintained
- Fencing of areas except for the outdoor area of the respite day care centre be avoided or minimised to just a few square metres
- Landscaping should be with local native species
- Public walkways be maintained including north of the current "barracks" buildings and around the oval as well as south of the Ten Terminal building connecting to the National Parks & Wildlife Service Park
- Car access for the public to the NPWS Park be maintained
- There should be acknowledgement and interpretation of the role of Ten Terminal in WW 2 and beyond both outside and inside the Ten Terminal building.



Kate Eccles

President

11th December, 2013