



Submission - Proposed Residential Aged Care Facility
Sydney Harbour Federation Trust

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**Submission - Proposed Residential Aged Care Facility
Assessment under Sydney Harbour Federation Trust Act 2001**

The Association appreciates the opportunity to comment.

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

At the heart of these aims and objectives is the belief that urban and foreshore bushland and open space have a public benefit to present and future generations.

The application to develop a Residential Aged Care Facility on Middle Head, Mosman does not meet these aims and objectives.

The proposal for the "adaptive reuse" of listed heritage buildings situated on public land as a residential aged care facility is in the private interest of the applicants and the clients of the facility rather than that of the wider public - all Australians. The fact that the location is a pleasant place for Aged Care is not a reason for using the land and buildings for that purpose.

While acknowledging that the revised proposal attempts to reduce the impact on a publicly owned precinct by restricting the development to one side of Middle Head Road, the Association continues to oppose the application. Further adjustments by the applicant to the design of the buildings cannot overcome the objections which are based on matters of principle relating to the EPBC Act and to the Trust's intention and objectives.

The public interest

The land on which this development is proposed is of national significance as a result of its position on Sydney Harbour and its aboriginal and military history.

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The financial benefit to the Sydney Harbour Federation Trust of having the Ten Terminal buildings "adapted" and renovated by a third party and from the future rental arrangements does not compensate the public for the loss of access and the loss of heritage values.

Alienation of public land and public buildings

Public access to the buildings and their curtilage will be lost. Also lost will be an understanding of the relationship with the nearby ASOPA buildings which have been sympathetically restored by the Harbour Trust for adaptive reuse.

Heritage

- **The buildings:** The buildings constructed in 1941 to house the Anti-Aircraft and Fortress Engineering School (School of Military Engineering) are on the Commonwealth Heritage list and form what is considered a rare complex. The proposed development is of a scale that overwhelms and alters the original austerity of design and the utilitarian nature of the structure. It is too substantial to be considered adaptive reuse.
- **The precinct:** The Middle Head precinct is listed as an historic place on the Commonwealth Heritage list. Its significance lies in its relationship to the whole former defence area of Middle Head, Georges Heights and Chowder Bay, and its continuing role and uses in the defence history of Australia during and after WWII. Historical interpretation and education are more valuable and more lively when the place continues to exist in the form it had during its history.
- **Aboriginal heritage:** While sites and objects have not been located here, there are opportunities for interpretation and reconciliation afforded by the encounters at Cobblers Beach and the history of Bungaree's farm, thought to have been at Georges Heights.

Natural qualities and visual amenity

- **At the precinct:** Although not everyone considers the red brick buildings and depot buildings particularly beautifully, these are of a height, scale and simplicity that are more in keeping with the nearby ASOPA buildings and more appropriate in a national, harbourside park than the development under consideration.
- **From the harbour:** The development will be more visible from the harbour than the existing buildings.

- **Parking needs:** The parking requirements for an aged care facility will be considerable. Paved parking areas are not desirable in a park.

EPBC Act 1999

The proposed development is in parkland of national significance created for the benefit of all Australians in perpetuity. It is inconsistent with the provisions of the EPBC Act

- According to the SHFT Management Plan for Middle Head, the precinct meets several criteria of the EPBC Regulations as listed under "Commonwealth Heritage Values"
- Public access to the heritage listed 10 Terminal building and its curtilage will be lost
- Heritage of both precinct and buildings will be severely diminished.
- Interpretative and educational opportunities will be lost
- The scale, bulk and character of the proposed buildings diminish the visual amenity of the precinct
- From Sydney Harbour the proposed building is more visible than the current cluster of buildings.
- Paving for extra parking will affect the natural landscape and views

SHFT Act

The development fails to meet the intention of the Act of Parliament which created the Trust to conserve and preserve the land for the benefit of present and future generations.

Objects of the Trust which are not met:

- Maximizing public access
- Protecting conserving and interpreting the environmental and heritage values of Trust land
- Ensuring that management of Trust land contributes to enhancing the amenity of the Sydney Harbour Region

The SHFT Comprehensive Plan

Objectives of the Comprehensive Plan which will not be met if the development goes ahead

- Adaptive reuse should be compatible with the objective of maximizing public access, have minimal adverse impacts on the environment and local amenity and
- In assessing adaptive reuse of places or buildings, the suitability of potential uses will be considered prior to the consideration of cost and revenue implications (**However, the Association considers the proposed development is too substantial to be considered adaptive reuse**)
- Noted in the Outcomes for the Headland Park under "Education and Interpretation" is the desire for cultural and educational activities to

explain the heritage values of the area, and the investigation of the possibility of an Aboriginal Cultural Centre.

SHFT Management Plan for the Middle Head Precinct

Aims of the Precinct Plan which are not met if the development goes ahead

- Conserving and interpreting the Commonwealth Heritage values. The precinct meets several criteria of the EPBC Regulations as listed under "Commonwealth Heritage Values"
- Maximising public access
- Enhancing views to and from the precinct
- Facilitating the adaptive reuse of the precinct's buildings for appropriate uses (The proposed use is not appropriate and the development goes beyond adaptive reuse).

Among the outcomes the Plan for Middle Head envisages:

- Adaptively reuse the buildings of 10 Terminal in a manner that retains and conveys their heritage values and contributes positively to the experience of visitors to the Headland Park. Suggested uses are visitor accommodation, dining, functions, offices, studios, education or similar.

Alternatives

There are potential alternatives to the development application for an aged care facility which are more appropriate to the vision of the SHFT Act and to the objectives of the Plans. Some alternatives are suggested in the Trust's Comprehensive Plan and its Precinct Management Plan. A cultural or educational and interpretative centre at 10 Terminal could fulfill a need for visitor experience both national and international. Aboriginal and military history are both part of the heritage of the Middle Head precinct.

Conclusion

The land on which the Aged Care facility is proposed is of national significance and has been set aside by an Act of Parliament as "a lasting legacy for the people of Australia".

The proposed development is inconsistent with the provisions of the EPBC Act 1999. It does not meet the aims and objectives of the Trust and it does not meet the expectations of the community.



Kate Eccles

President

3rd August, 2014