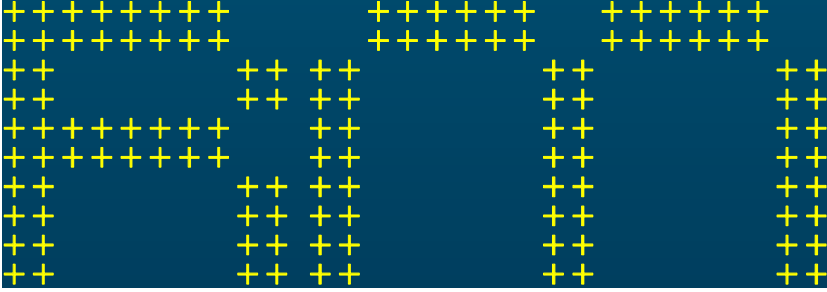
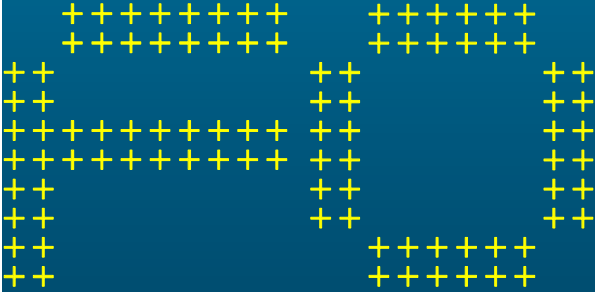
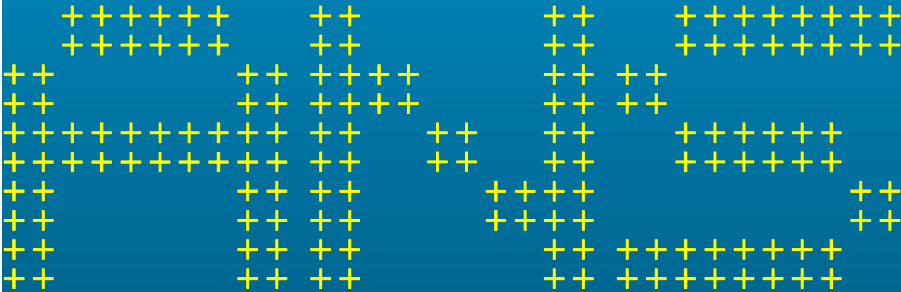
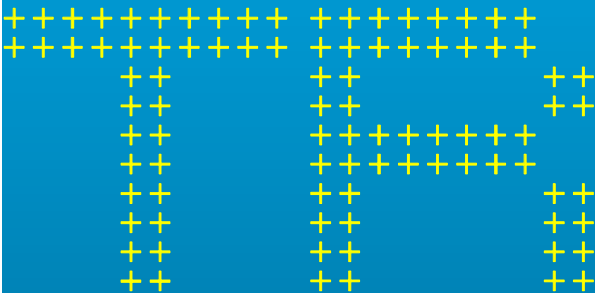


AIPM, North Head Manly

Preferred Project Report

December 2008



Preferred Project Report

Prepared for Australian Federal
Police

December 2008

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Executive Summary

This Preferred Project Report (PPR) is submitted on behalf of the proponent, the Australian Federal Police in regards to the proposed redevelopment of the Australian Institute of Police Management (AIPM) site for the ongoing and long term sustainable use of the site by the AIPM.

The PPR has been prepared in response to the outcomes of the public exhibition of the proposal and the ongoing on-going consultation with the NSW Department of Planning (DOP) and the Commonwealth Department of Environment, Water, Heritage and the Arts (DEWHA).

This PPR presents an amended design scheme (Preferred Project Scheme) which has been the product of extensive deliberation and design modification in response to the issues raised by DoP, DEWHA, other government agencies and the public submissions arising from the exhibition process. The key amendments to the plans involve:

- Deletion of the previously proposed pavilion forms north and “in front” of the heritage Axial Hospital Group building.
- Location of visitor accommodation in the south western portion of the site.
- Retention of all existing cottage buildings: Spring Cove Cottage, Garden Cottage, Kookaburra Cottage and Harbour Cottage.
- Retention of the heritage Jetty Road layout.
- No proposed development north of Jetty Road, providing new fauna foraging areas and additional setbacks from the cliff line /northern boundary.

Overall, the Preferred Project Scheme aims to address the key ecological and heritage considerations by providing suitable setbacks for fauna species and enhanced foraging areas; and the additional retention of heritage significant buildings. The Preferred Project Scheme accordingly seeks approval for:

- Demolition of the dormitory style visitor accommodation blocks, administrative office accommodation, senior common room facilities and ancillary buildings.
- New visitor accommodation within 2 building forms of two storeys, comprising a total of 45 beds and one teaching room.
- Refurbishment and a single storey western extension of the existing library and construction of a new two storey administration building east of the existing library.
- Refurbishment of the Axial Hospital Group building to accommodate teaching rooms, dining areas, the Senior Common Room, and meeting areas.
- Landscape improvement works including the reinstatement of lawn areas north of the Axial Hospital Building following the removal of the existing dormitory buildings and interpretation of the Jetty road. Development of a “natural creek” to the north of the site and opportunity for filtration of stormwater.
- Increase in residential visitor accommodation facilities from 30 beds to 54 beds and a total staff level from 35 to 40 employees (inclusive of training, administrative and maintenance staff).
- New car park area and improvement to car park layout.
- The selection of materials and colours to integrate with heritage buildings and the surrounding natural bushland setting.
- Retention of the existing stonewall along the site’s eastern boundary.
- Incorporation of resource efficiency measures in design and operation.

The Preferred Project Scheme is assessed to meet the objectives and provisions of relevant planning instruments and policies, namely the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005; Sydney Harbour Foreshores and Waterways Area Development Control Plan 2005; Manly Local Environmental Plan 1988; the NSW Coastal Policy; and the Coastal Design Guidelines for NSW.

An updated suite of technical reports have been submitted with this PPR, which provide an assessment of the Preferred Project Scheme. The assessments by specialist consultants demonstrate that potential impacts associated with traffic; heritage, flora and fauna; and other environmental considerations have been considered and are acceptable. A range of recommendations are provided and will be implemented to ensure the environmental and ecological integrity of the site and its surrounds are maintained.

The redevelopment option will provide the opportunity to comprehensively conserve all key heritage buildings and the overall site in accordance with a Historic Heritage Management Plan. The AIPM's continued occupation of the site will maintain the historical Commonwealth associations of the site and with North Head.

The development provides for the opportunity to ecologically enhance the site. Landscaping works will include new and enhanced foraging areas for fauna to the north of the site through the removal of two non heritage buildings, and the addition of endemic species of the North Head area. Site works include the improved stormwater management measures that will improve the quality of stormwater runoff into Spring Cove.

1 Introduction

This Preferred Project Report (PPR) is submitted on behalf of the proponent, the Australian Federal Police in regards to the proposed redevelopment of the Australian Institute of Police Management (AIPM) site for the ongoing and long term sustainable use of the site by the AIPM. The PPR has been prepared in response to the outcomes of the public exhibition of the proposal in December 07 to February 08 and the ongoing bilateral assessment by the NSW Department of Planning (DOP) and the Commonwealth Department of Environment, Water, Heritage and the Arts (DEWHA).

This PPR presents an amended design scheme (Preferred Project Scheme) and planning assessment relative to the key issues raised by DoP, DEWHA, government agencies and the general public. This report is supplemented by the following specialist inputs/ documents to assist DOP and DEWHA in their assessment of the Major Project, under the Part 3A Major Project Application provisions and the bilateral assessment arrangements between the State and Commonwealth governments:

- Updated architectural drawings by Brewster Hjorth Architects (BHA) (Appendix A).
- Revised landscape drawings and report by Taylor Brammer (Appendix B).
- Photomontages by Haycraft Duloy Pty Ltd (Appendix C).
- Revised Ecological Report & Marine Assessment Report by Alison Hunt & Associates Pty Ltd (Appendix D).
- Revised Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) by Gondwana Consulting Pty Ltd (Appendix E).
- Revised Heritage Impact Statement and Historic Heritage Management Plan by Noel Bell Ridley Smith & Partners (NBRS&P) (Appendix F).
- Revised Bushfire Threat Assessment report by Bushfire Protection Planning & Assessment Services (Appendix G).
- Updated Traffic and Parking report by TEF Consulting (Appendix H).
- Updated Indigenous Cultural Assessment Report by McHardle Heritage (Appendix I).
- Updated Stormwater Assessment report by CRW Engineers (Appendix J).
- Arborist Development Assessment report and Root Mapping Assessment report by Moore Trees (Appendix K).
- Archaeological Report by Casey & Lowe Pty Ltd (Appendix L).
- Revised Draft Statement of Commitments (Appendix M).
- Updated Infrastructure, Building Services and Energy Savings Report by Medland Metropolis (Appendix N).

In view of the extent of design changes undertaken, in responding to the recommendations of all levels of government and the general public, this PPR includes a revised assessment of the relevant planning provisions and policies to assist the DoP and DEWHA in their assessment of the PPR.

2 Background to the Preferred Project

Since the lodgement of the application on 30 November 2007, the proposal has been subject to assessment by the DoP and DEWHA. This process has included the public notification of the proposal from 12 December 2007 to 15 February 2008, review of submissions from a range of stakeholders; and a series of meetings with DoP and Commonwealth DEWHA officers.

Key meetings held with the NSW and Commonwealth government officers to resolve the issues and form the basis of the design development of the preferred project scheme are outlined as follows:

Date	Agency
19 February 2008	Meeting with DoP & DEWHA to discuss issues raised during the public exhibition period and to establish which legislative provision took precedence.
28 March 2008	Meeting with DEWHA to discuss the issues raised in the Commonwealth submission.
3 April 2008	Meeting with DoP to discuss the potential design concepts and request a meeting with all parties to be facilitated by DoP.
8 April 2008	Meeting with DoP, DEWHA, AFP, AFP Consultants to discuss the issues raised in all submissions in detail.
21 April 2008	Meeting with Heritage Officers from DEWHA to present potential concept designs.
30 April 2008	Meeting with DoP to discuss the issues resulting from the meeting with the Heritage Officers from DEWHA and to present potential concept designs.
28 July 2008	Presentation of AIPM Concept Design Option B to DoP and DEWHA for in principle agreement to proceed to prepare the PPR.
30 September 2008	Meeting with NSW National Parks to present revised scheme and discussion on ecological considerations.
29 October 2008	Meeting with NSW National Parks – Threatened Species Unit to present revised scheme and discussion on ecological considerations and management.

Separate to the Part 3A Project Application, an Aboriginal Land Claim (No. 16448) was lodged over the Collins Beach site on the 20 August 2008 and revised on 17 September 2008. The AFP has responded to this issue and provided evidence in relation to the Aboriginal Land Claim No. 16448. A determination by the NSW Minister for Lands is anticipated in the early part of 2009.

3 Site Description

3.1 Site Description

The AIPM site is identified under Part 8, Schedule 3 of the Major Projects SEPP as the North Head Federal Police Training site. The site is located on approximately 1.8 hectares on the foreshores of North Head, to the south of Collins Beach.

The site occupies a relatively isolated position, accessed by Collins Beach Road and surrounded by Sydney Harbour National Park. The former Quarantine Station lands and the former School of Artillery lands are located within proximity to the site.

The site is visible from vantage points to the north at Manly, across Spring Cove to reveal a group of single and two storey buildings established against a backdrop of native vegetation associated with the adjacent Sydney Harbour National Park and vegetation within the site.

The key aspects of the site:

- The site is legally identified as Lot 2766 in Deposited Plan 752038.
- The site is currently occupied by the Australian Institute of Police Management (AIPM), which has formally operated from the site since 1960. Prior to 1960 the site was used for many purposes, the main being as a Seaman's Isolation Hospital (refer to Heritage reports in Appendix F).
- The site accommodates a group of low rise single and two storey buildings, some of which are identified to be of heritage significance. Buildings generally comprise timber framed structures clad in weatherboard and asbestos cement sheet or modest brick structures with corrugated steel sheet roofs. The key built form structures of the site are categorised into the following groups:
 - The Axial Hospital Group

Includes the most substantial building on the site, comprising an elongated single built form and accommodates offices, lecture rooms, dining room and kitchen. “*Spring Cove Cottage*” is a heritage item is currently used for short term accommodation for course participants.
 - *Garden Cottage*, *Harbour Cottage* and *Kookaburra Cottage* which have been adapted to accommodate short term accommodation for course participants.
 - Other built elements

These include two dormitories north of the Axial Hospital Group; senior common room; two storey library and administration building; the *Syndicate Building* and other minor buildings.

To accommodate the existing and past land use, the site was previously cleared of vegetation and is currently moderately landscaped with open lawn areas and scattered native feature trees.

The site is relatively level with a gradual downward slope towards the north, where the land steeply slopes along the northern boundary down a small sandstone cliff abutting Spring Cove.

A portion of the foreshore provides habitat for the endangered Little Penguin population; whilst northern located grassed areas of the site provide for foraging opportunities for the Long-nosed bandicoot. However, the site is not suitable habitat for breeding of the Long-nosed bandicoot. This species would find nesting habitat within the Sydney Harbour National Park.

3.2 Locality and Surrounding Context

3.2.1 North Head and Surrounds

North Head is associated with significant cultural and natural distinction with particular historic themes of quarantine, military and recreational use. The site is contiguous with the former Quarantine Station lands and is located within close proximity to the former School of Artillery lands.

The Sydney Water Pollution Control Plant is located on the eastern shore, amidst Sydney Harbour National Park lands.

A range of health and educational uses provide for an interface between the Sydney Harbour National Park lands and established residential development to the north. These uses include the St Patrick's Estate that accommodates the International College of Tourism and Hotel Management; St Paul's College and Manly Hospital.

3.2.2 Site Interfaces and Land Use

The site is accessed by Collins Beach Road and is surrounded by Sydney Harbour National Park. Given the relative isolation of the site, the key interfaces with the subject land is limited to the Sydney Harbour National Park (SHNP) and Spring Cove. For bushfire protection purposes, an asset protection zone (APZ) is established on the SHNP along the western and southern boundaries of the AIPM site. This APZ is provided in agreement between the National Parks and Wildlife Service (NPWS) and the AIPM and it is understood that this APZ is currently required to be 10m wide and to be maintained and managed by AIPM in consultation with NPWS.

3.2.3 Transport Infrastructure

The site's isolated position is not within proximity to public transport facilities. The AIPM currently relies on private vehicles, AIPM bus shuttle services and taxi services.

3.2.4 Recreational Amenity

Positioned within Sydney Harbour National Park and adjacent to Collins Beach, the site is within immediate reach of natural bushland recreational pursuits.

3.2.5 Environmental Amenity

The site's north western orientation gives rise to a high level of solar access. The absence of adjacent built form structures and the presence of low rise built form structures within the site provides for generous landscaped areas with appropriate levels of solar access throughout the day. Positioned towards the northern point of Spring Cove, the site is protected from seasonal winds.

To accommodate the existing land use, the site was previously cleared of vegetation and is currently moderately landscaped with open lawn areas that provide useable and passive recreational uses and foraging opportunities for the Long-nosed bandicoot. Scattered native feature trees provide for shade and vegetation between buildings to integrate the site within the context of Sydney Harbour National Park.

As previously identified, a portion of the foreshore provides habitat for the endangered Little Penguin population.

3.3 Local and Site Constraints and Opportunities

Having regard to the above locality and site characteristics, the following constraints and opportunities are identified below:

-
- The immediate proximity of Sydney Harbour National Park lands and relative isolation of the site requires implementation of bushfire management plans and mitigation measures.
 - The site's natural bushland setting and views of the site from northern vantage points requires a sensitive architectural design approach to minimise potential visual, scenic impacts and the overall cultural and historic significance of North Head.
 - The presence of heritage items on the site requires sensitive and compatible redevelopment of the site and the retention of significant buildings.
 - The ecological attributes of the site requires sensitive siting of the development; and implementation of construction and operational management procedures including stormwater management to ensure no impacts to significant flora and fauna, particularly the habitat of the Little Penguin and foraging areas for the Long-nosed Bandicoot. The redevelopment of the site provides for opportunities to ecologically enhance the attributes of the site.
 - The absence of public transport infrastructure requires consideration to appropriate provision for on-site parking to meet the demands of the upgraded facility.
 - The site's extensive separation from residential properties across from Spring Cove, provides for less significant development constraints to the future development of the site such as privacy and amenity impacts.
 - The extent of solar access to the site provides opportunity to design a scheme that captures natural sunlight.

4 The Preferred Project & Proposed Amendments to the Design

4.1 The Proposal

This PPR accompanies a modified Project Application scheme (Preferred Project Scheme) for the redevelopment and upgrading of the AIPM site and associated facilities, including associated landscaping works. The proposed development has been the product of extensive deliberation and design modification in response to the issues raised by DoP, DEWHA, other government agencies and the public submissions arising from the exhibition process. The key amendments to the plans involve:

- Deletion of the previously proposed pavilion forms north and “in front” of the heritage axial hospital group building.
- Location of visitor accommodation in the south western portion of the site.
- Retention of all existing cottage buildings: Spring Cove Cottage, Garden Cottage, Kookaburra Cottage and Harbour Cottage.
- Retention of the heritage Jetty Road layout.
- No proposed development north of Jetty Road, providing new fauna foraging areas and additional setbacks from the cliff line /northern boundary.

Overall, the Preferred Project scheme aims to address the key ecological and heritage considerations by providing suitable setbacks for fauna species and enhanced foraging areas; and the additional retention of heritage significant buildings. The Preferred Project Scheme accordingly seeks approval for:

- Demolition of the dormitory style visitor accommodation blocks, administrative office accommodation, senior common room facilities and ancillary buildings.
- New visitor accommodation within 2 building forms of two storeys, comprising a total of 45 beds and one teaching room.
- Refurbishment and a single storey western extension of the existing library and construction of a new two storey administration building east of the existing library.
- Refurbishment of the Axial Hospital Group building to accommodate teaching rooms, dining areas, the Senior Common Room, and meeting areas.
- Landscape improvement works including the reinstatement of lawn areas north of the Axial Hospital Building following the removal of the existing dormitory buildings and interpretation of the Jetty road. Development of a “natural creek” to the north of the site and opportunity for filtration of stormwater.
- Increase in residential visitor accommodation facilities from 30 beds to 54 beds and a total staff level from 35 to 40 employees (inclusive of training, administrative and maintenance staff).
- New car park area at the western end of the southern boundary; widening of aisle width of the existing car park area east of the Axial Hospital Building and additional 4 parking spaces to the north of eastern car park area.
- The selection of materials and colours to integrate with heritage buildings and the surrounding natural bushland setting. Selected materials require low maintenance and durability.
- Retention of the existing stonewall along the site’s eastern boundary.
- Incorporation of resource efficiency measures in design and operation.

Details of the amended design scheme shown on the architectural plans prepared by BHA and landscape plans by Taylor Brammer, are relied upon within this Preferred Project Report (**Appendix A and B**).

The following statistics provide a comparative summary of key development statistics between the existing development, the previously proposed scheme and the Preferred Project Scheme.

Table 1 – Development Statistics

Statistic	Existing	Previous Proposed Scheme (Eco Heritage Masterplan)	Preferred Project Scheme
Site Area	18,396sqm	18,396sqm	18,396sqm
Site Cover (Total Building Footprint)	3,379sqm	3,485sqm	3,398sqm
Total area of paths, decks and roads	2,213sqm	2,727sqm	3,275sqm
Gross Floor Space	3,764sqm	4,685sqm	4,368sqm
Building Height (Storeys)	1 and 2 storeys	New buildings 1 and 2 storeys	New buildings 2 storeys. Extension to the library will be 1 storey.
Landscape area	12,804sqm	11,204sqm (excludes landscaping below boardwalks)	11,723sqm
No. of beds (total for site)	30	60	54
Car parking spaces	37	43 plus 1 space for bus/service vehicle	34 plus 1 space for bus/service vehicle

In comparison to the previous scheme, the Preferred Project scheme entails a decrease in 6 beds in the extent of accommodation proposed and a consequent reduction to the extent of floor space and site cover previously proposed.

Relative to existing development on the site, the Preferred Project Scheme provides for an increase in floor space of 604sqm and a minor increase in building site cover by 19sqm, due to the proposed two storey configuration of the revised scheme. Overall, the development scheme represents a minor increase in floor area relative to the extent of site area, from an FSR of 0.2:1 to 0.237:1.

Refer to the following figures that illustrate the amended site layout.

Figure 2 – Previous scheme

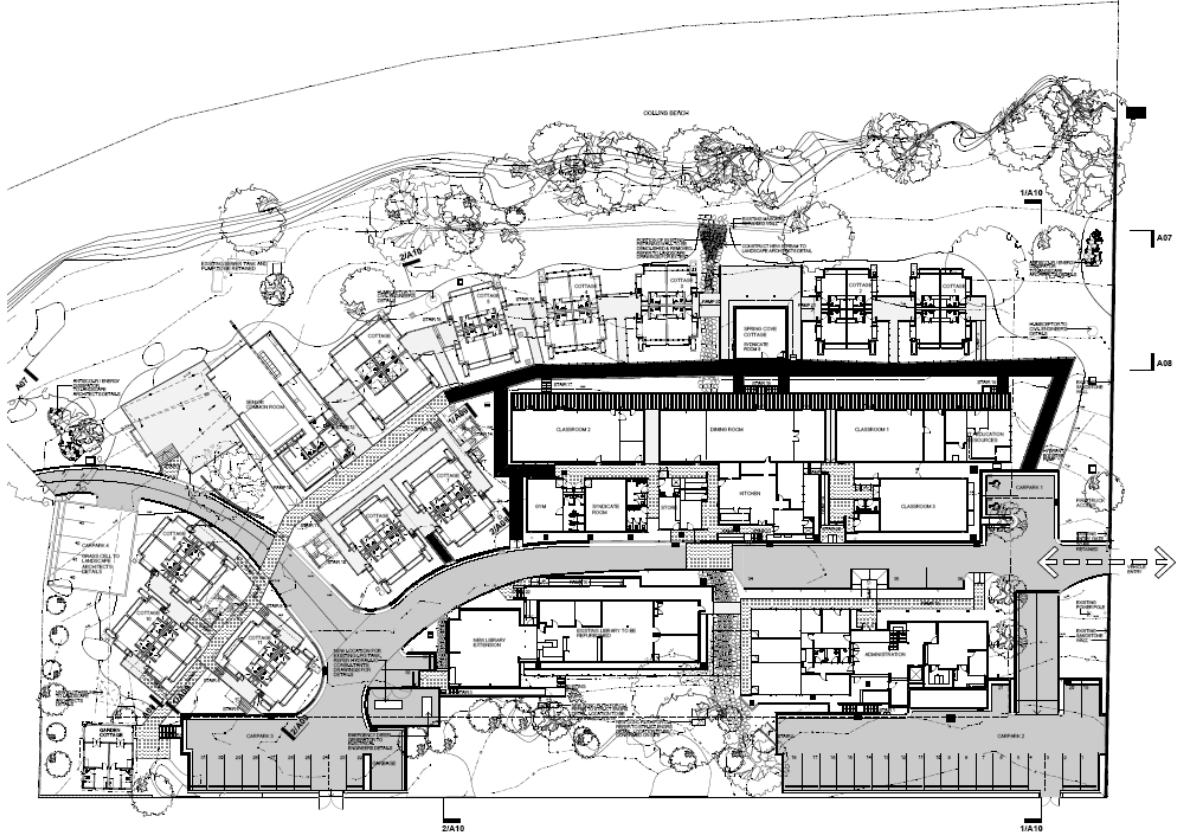


Figure 3 – PPR Scheme



5 Statutory Planning Assessment

The Preferred Project Scheme has been reassessed in relation to the following relevant planning instruments and policies.

5.1 Environment Protection and Biodiversity Conservation Act 1999

On the 2nd of August 2007, the proponent was advised by the then Commonwealth Department of Environment and Water Resources (now DEWHA), that the proposal will be considered at the Federal level in respect to the Environment Protection and Biodiversity Conservation Act 1999 concurrently with the Part 3A Major Process. This assessment will be through a one-off accredited assessment process between DOP and DEWHA. Further details relating to the EPBC Act is contained in Section 6.4.

5.2 Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

The Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (SREP 2005) provides a planning framework to achieve better environmental outcomes for Sydney Harbour and its catchments.

The site is located within the foreshore and waterways area of SREP 2005 and the relevant provisions are addressed in the table below:

Table 2 – SREP 2005

Provision	Comment
<ul style="list-style-type: none"> ▪ Planning principles relating to the Sydney Harbour Catchment. (Clause 13) 	<ul style="list-style-type: none"> ▪ Water Sensitive Urban Design principles are adopted in the proposed management of stormwater and to minimise hydrological impacts of the development on the surrounding environment and Spring Cove. ▪ During the construction phase, the impact of water movement on and off the site is to be minimised by adopting pollutant control measures as part of the stormwater management strategy. Refer to Appendix J. ▪ Scenic and cultural values of the catchment area will be enhanced by the retention of all key heritage buildings on the site and the siting of new development at the south-western and southern areas of the site. ▪ Removal of the dormitory buildings in front of the Axial Hospital Group Building, retention of significant landscape elements supplemented by new landscaping will enhance the scenic and visual values of the catchment. ▪ Ecological qualities of the site will be enhanced by providing new landscaped areas for bandicoot foraging and setback of new buildings away from the northern boundary and the Little Penguin colony.
<ul style="list-style-type: none"> ▪ Planning principles relating to the Foreshores and Waterways area (Clause 14). 	<ul style="list-style-type: none"> ▪ As identified above, the visual qualities of Sydney Harbour will be retained by ensuring the appropriate development of foreshore land that entails appropriately sited and scaled built forms to integrate with existing buildings and the natural surrounds.
<ul style="list-style-type: none"> ▪ Planning principles relating to heritage conservation (Clause 15). 	<ul style="list-style-type: none"> ▪ Heritage qualities of the site will be enhanced by the retention of all key heritage buildings, removal of existing buildings in front of the Axial Hospital Group building and appropriate siting of new structures to enhance the interpretation of the existing heritage items. ▪ The overall historical significance of the site and North Head will be preserved given that the redevelopment is an appropriate design outcome.

Provision	Comment
<ul style="list-style-type: none"> ▪ Biodiversity, ecology and environment protection (Clause 21). 	<ul style="list-style-type: none"> ▪ Existing stormwater management facilities are currently outdated and include minimal environmental improvements. ▪ The stormwater management will be designed to improve existing quality of stormwater through the site. Stormwater pollution control pits will be provided to capture sediment and gross pollutants and remove oil from stormwater runoff. ▪ Additional stormwater quality control measures include the establishment of a natural creek that will act as a natural filtration body to minimise impacts to the aquatic conditions of Spring Cove.
<ul style="list-style-type: none"> ▪ Foreshore & Waterways Scenic Quality (Clause 25). 	<ul style="list-style-type: none"> ▪ To maintain the scenic quality of the foreshores and waterways, the development has been designed with consideration to retention of all key heritage buildings and appropriate siting of new structures to enhance the interpretation of the existing heritage items. ▪ The scheme will enable unencumbered views to the heritage axial hospital group building from the harbour.
<ul style="list-style-type: none"> ▪ Maintenance, protection and enhancement of views (Clause 25). 	<ul style="list-style-type: none"> ▪ As the site is nestled within Spring Cove, the proposed buildings will not affect existing view corridors to other key features of Sydney Harbour. ▪ The scheme will enable unencumbered views to the heritage axial hospital group building from the harbour.
<ul style="list-style-type: none"> ▪ Development affecting matters of Aboriginal and non- Aboriginal heritage significance (Part 5 of the SREP). 	<ul style="list-style-type: none"> ▪ The provisions of Part 5 do not apply as the site is not identified as a heritage item in respect to Aboriginal and non – Aboriginal significance under the Heritage Map and Schedule 4 of the SREP. ▪ The site is listed as an item of local environmental significance under Manly LEP and the site is also within the North Head environs which is listed under the register of the National Estate. A revised assessment in respect to heritage impacts is submitted in Appendix F.
<ul style="list-style-type: none"> ▪ Wetlands protection areas as identified under SREP 2005. 	<ul style="list-style-type: none"> ▪ The northern boundary of the site is identified as a “wetlands protection area”. The proposed works are consistent with the objectives of the plan in relation to wetlands in that: <ul style="list-style-type: none"> – Proposed stormwater run off control measures are designed to improve the quality of stormwater runoff from the site and include the establishment of a natural creek bed to act as a filter for stormwater to Spring Cove and the identified wetland protection area. – Habitat areas for the Little Penguin colony are retained.
<ul style="list-style-type: none"> ▪ Strategic Foreshore Sites. 	<ul style="list-style-type: none"> ▪ The site is within the Manly North Head area which is a foreshore strategic site. Under the SREP, a master plan may be prepared for part or whole of the site. ▪ This provision is not relevant to the development unless the Minister requires a Master Plan. ▪ An “Eco-heritage Masterplan” was prepared in response to during the Commonwealth assessment process. The Preferred Project scheme is based on a further development of the scheme as a consequence of public and government submissions.

5.3 Sydney Harbour Foreshores and Waterways Area Development Control Plan 2005

The Sydney Harbour Foreshores and Waterways Area Development Control Plan (DCP 2005) supplements SREP 2005 by providing performance based criteria and guidelines. The relevant provisions relating to ecological, landscape and land based developments are addressed in the table below.

Table 3 – DCP 2005

Ecological Assessment		
<p>The northern boundary of the site abuts Spring Cove. The “Ecological Communities and Landscape Characters” map identifies the following Aquatic Ecological Communities adjacent to the site: Sandy Beaches; Seagrass Beds; and Mixed Rocky Intertidal and Sand.</p>		
Statement of Intent	Relevant Performance Criteria for Development Adjoining High Conservation Communities	Comment
Controlling Shading	<ul style="list-style-type: none"> ▪ Avoid shading seagrass communities; ▪ Protect food sources for grazing organisms; and ▪ Maintain algal growth in intertidal zones. 	<ul style="list-style-type: none"> ▪ Proposed building setbacks and height will not overshadow seagrass areas and intertidal zones in Spring Cove. ▪ No impacts to food sources as development is to be well setback from Spring Cove and stormwater run-off from the site to Spring Cove to be appropriately filtered on site.
Urban Run-off	<ul style="list-style-type: none"> ▪ Implementation of appropriate on-site control measures to ensure: ▪ No transfer of pollutants nor increase in nutrient levels to intertidal zone; and ▪ No permanent increase in suspended solids (turbidity). 	<ul style="list-style-type: none"> ▪ Appropriate stormwater run-off systems to be implemented including establishment of a natural creek to act as filtration measures.
Physical Damage	<ul style="list-style-type: none"> ▪ Activities and structures adjacent to communities of high conservation value avoid physical damage to communities. 	<ul style="list-style-type: none"> ▪ No impacts to adjacent aquatic ecological communities as proposed building works are well setback from Spring Cove and the stringent requirements of the CEMP.

Landscape Assessment

The site is identified as “Landscape Character Type 1”, which applies to Middle Harbour.

Statement of Character and Intent:	Performance Criteria	Comment
<p><i>Foreshores have been subject to minimal development pressure and generally the shoreline and vegetation are well conserved. The bays and inlets create a sense of enclosure with natural elements, such as vegetation and headlands, dominating the landscape. Development should ensure that the key features which contribute to this landscape are protected.</i></p>	<ul style="list-style-type: none"> ▪ Retain undeveloped state of headlands, points and the shoreline. ▪ Maintain visual dominance key natural landscape features by appropriate siting and design of development. ▪ Maintain visual continuity of elements such as cliffs, rock shelves and beaches. ▪ Minimise intrusion of water-based structures to maintain sense of enclosure to inlets. ▪ Retain the predominance of the natural shoreline. ▪ Adopt appropriate colours to match the natural environment. 	<ul style="list-style-type: none"> ▪ Development is confined to the existing developed area of North Head. ▪ Extent of proposed works represents the sensitive siting of 2 storey building forms, which will retain the existing general visual presence of built form. ▪ Building height and form are limited to below the height of the existing lightwell/turret to the library and will allow for retention of 57 trees out of 86 existing trees and opportunity to reinstate landscape areas in front of the Axial Hospital Group building. Trees to be removed include those in poor health/structural problems or exotic species or located in a poor location. Other trees to be removed include smaller trees or those required to accommodate the development. ▪ Siting of the development is not a cliff edge, rock shelf or beach. Preferred Project Scheme includes increased setbacks away from the cliff line. ▪ No water-based structures are proposed. ▪ Proposed materials and colours appropriately complement the natural bushland setting and existing heritage buildings on the site.

Design Guidelines for Land-Based Developments

The proposed development is located above mean high water mark and is categorised as “land-based” development under this DCP.

Guideline	Provision	Comment
Foreshore Access	<ul style="list-style-type: none"> ▪ Where possible provide and improve public access to and along foreshores. 	<ul style="list-style-type: none"> ▪ Proposed development is located wholly within the site and does not impact upon the existing foreshore access to Collins Beach.
Siting of Buildings and Structures	<ul style="list-style-type: none"> ▪ Siting of development to take into account: ▪ Council foreshore building lines; ▪ Setbacks from native vegetation; ▪ Address the waterway; ▪ Retain views of landmarks and key features; ▪ Siting above cliffs or steep slopes rather than flat land at the foreshore; and ▪ Minimise loss of views. 	<p>Development is sited to achieve the following:</p> <ul style="list-style-type: none"> ▪ Provision of extensive setbacks to Spring Cove by the siting of new buildings south of Jetty Road. ▪ Key native vegetation areas are retained. This includes vegetation to the north, adjacent to the cliff. ▪ All proposed buildings are setback from the harbour but designed to address Spring Cove. ▪ Removal of elongated dormitory buildings in front of the heritage significant “Axial Hospital Group” building to provide for unencumbered views to the heritage building from the waterway. ▪ Development is confined to existing developed areas above the site’s setback and cliff edge. ▪ As the site is nestled within Spring Cove, the proposed buildings will not affect existing view corridors to other key features of Sydney Harbour.
Planting	<ul style="list-style-type: none"> ▪ Provide a landscape plan and provide for: ▪ Incorporation of appropriate species found in the surrounding landscape; ▪ Include endemic native species where native vegetation is present; ▪ Retain mature vegetation where possible and development along ridgelines; and ▪ Avoid exotic species. 	<p>Landscape plan submitted and includes:</p> <ul style="list-style-type: none"> ▪ The retention of the majority of trees, landscape areas and preservation of native grasses and developing Fig trees on the cliff edge. ▪ Weed species will be managed out of the site and replaced with endemic vegetation. ▪ Implementation of vegetation species endemic to the locality.

5.4 Manly Local Environmental Plan 1988

The site is situated within the land covered by the Manly Local Environmental Plan 1988 (LEP 1988) and is zoned No.8 National Park. Although the site has been listed as a State Significant Site under Schedule 3 of the Major Projects SEPP, the following provisions of the Manly LEP 1988 are considered below.

Table 4 – LEP 1988

Provision	Comment
<p>Visual and aesthetic protection on certain land (Clause 17)</p> <ul style="list-style-type: none"> ▪ Development to have no detrimental effect on the amenity of the foreshore scenic protection area 	<ul style="list-style-type: none"> ▪ The Preferred Project Scheme represents a further development of the project taking into consideration the issues raised from the submissions and government agencies. Key outcomes enable the removal of existing buildings in front of the Axial hospital group building and providing for unencumbered views to this Axial Hospital Goup and retention of all key heritage buildings. ▪ Siting and scale of buildings is designed to reflect existing building forms and integrate appropriately with existing built and natural environs. Refer to Section 6.3.9 for further details.
<p>Impacts upon environmental heritage (Clauses 18, 19, 20, 22)</p> <ul style="list-style-type: none"> ▪ Proposed works to items of environmental heritage are to be accompanied by an assessment of the significance of the heritage item and the potential impacts upon the significance of the environmental heritage and its site and setting. ▪ Development in the vicinity if a heritage item is required to be assessed in terms of the impacts to the item of environmental heritage and its setting. ▪ Referral to National Parks and Wildlife where development is in the vicinity of an Aboriginal relic. ▪ Referral to the Heritage Council where a building of environmental heritage is proposed to be demolished. 	<ul style="list-style-type: none"> ▪ The site is listed as an item of environmental heritage under LEP 1988 and is located in the vicinity of adjacent heritage items. ▪ An assessment of the European and Aboriginal heritage significance of the site and the impacts of the proposed development are undertaken for the Preferred Project Scheme. Refer to Appendices F&I. ▪ Proposed works are confined to areas already occupied for the current use and will entail minimal excavation works. No Aboriginal archaeological sites were identified as part of the archaeological investigations. ▪ The proposed works represent an appropriate form of development for the site and to be guided by the Historic Heritage Management Plan. ▪ North Head comprises a number of heritage items listed under the Manly LEP. The proposed works are located away from such items such that no detrimental impacts will occur. ▪ It is anticipated the DoP will refer the PPR to the Department of Environment and Climate Change (DECC) and the NSW Heritage Offices well as DEWHA.
<p>Services (Clause 30)</p> <ul style="list-style-type: none"> ▪ Satisfactory provision of water and sewerage services to the site is required for any proposed development. 	<ul style="list-style-type: none"> ▪ The site is currently serviced and future development will be accommodated in accordance with Sydney Water requirements. Refer to Appendix N.

5.5 The NSW Coastal Policy

The NSW Coastal Policy aims to guide the future management and planning of the coastal zone. Whilst the site is not directly situated within the “coastal zone”, as illustrated by Figure 6 of the NSW Coastal Policy, the relevant considerations of the Policy are addressed below. These considerations relate to the range of objectives which underpin the long term goals of the Policy.

Table 5 – NSW Coastal Policy

Objectives	Comment
<ul style="list-style-type: none"> ▪ Conservation, protection and recovery of native threatened and endangered flora and fauna. 	<ul style="list-style-type: none"> ▪ Ecological qualities of the site will be enhanced by providing new landscaped areas for bandicoot foraging in key location. ▪ Removal of existing buildings currently located in proximity to the Little Penguin colony. Setback of new buildings away from the northern boundary and Little Penguin colony. ▪ Preferred Project Scheme is a response to the issues raised by government and general public relating to proximity of buildings to penguins and loss of bandicoot foraging area. ▪ A revised Construction Environmental Management Plan and a revised Operational Environmental Management Plan have been prepared to identify measures during the construction period and on going operation of the AIPM use for the protection of endangered fauna.
<ul style="list-style-type: none"> ▪ Water quality protection and improvement. 	<ul style="list-style-type: none"> ▪ Proposed stormwater run off control measures are designed to improve the quality of stormwater runoff from the site and include the establishment of a natural creek bed and macrophytic planter beds to act as a filter for stormwater to Spring Cove and the identified wetland protection area.
<ul style="list-style-type: none"> ▪ Minimisation of impacts to environmentally sensitive areas and cultural heritage. 	<ul style="list-style-type: none"> ▪ Preferred Project Scheme is a response to the issues raised by government and general public relating to proximity of buildings to fauna and heritage considerations of the site. ▪ Preferred Project scheme entails retaining key heritage significant buildings and appropriate siting of buildings to ensure no impacts to the heritage significance of the site. ▪ The proposed works are to be guided by a Historic Heritage Management Plan.
<ul style="list-style-type: none"> ▪ Protection of areas of high natural or built aesthetic quality. 	<ul style="list-style-type: none"> ▪ Preferred Project Scheme is a response to the issues raised by government and general public relating to the natural and built environment. ▪ Siting of proposed buildings and removal of existing buildings enables unencumbered views of Axial Hospital building from the harbour and provide a new appreciation of the site's history.
<ul style="list-style-type: none"> ▪ Design and siting of development to complement surrounding environments and promote good aesthetic qualities. 	<ul style="list-style-type: none"> ▪ Building height and siting is designed to reflect existing building forms and integrate appropriately with existing built and natural environs. Refer to Section 6.3.9 for further details. ▪ External finishes are selected to complement the heritage buildings on site and the natural surrounds.
<ul style="list-style-type: none"> ▪ Management and conservation of cultural heritage places and items. 	<ul style="list-style-type: none"> ▪ Preferred Project scheme entails retaining key heritage significant buildings. ▪ The refurbishment and redevelopment will be undertaken in accordance with a Historic Heritage Management Plan.
<ul style="list-style-type: none"> ▪ Implementation of “best practice” approaches to achieving sustainable development and resource management. 	<ul style="list-style-type: none"> ▪ The project incorporates Ecological Sustainable Design principles given the environmentally sensitive nature of the site and overall promotion of policies to conserve the environment and minimise use of non-renewable resources. Refer to Appendix N.

5.6 Coastal Design Guidelines for NSW

The Coastal Design Guidelines for NSW provides for urban design practices and principles to achieve the sensitive development of unique natural and urban settings of coastal places in NSW.

The Guidelines provide “*desired future character*” guidelines for each type of coastal settlement types, with the most relevant character guidelines relating to “*isolated coastal dwellings*”. Although the site is not a “dwelling”, the site and its remote context fit within the desired future character for isolated coastal dwellings. The proposed development in reference to the character guidelines are addressed in the table below:

Table 6 – Coastal Design Guidelines for NSW

Desired Future Character	Comment
<ul style="list-style-type: none"> ▪ Relationship to the environment ▪ Locate and construct buildings that protect Aboriginal and European places, relics and items; and vegetation. ▪ Management of conflict between native vegetation protection and bushfire management. ▪ Potential impacts on water quality are reduced by locating buildings away from waterways; and manage impacts on fragile ecosystems. ▪ Provide appropriate setbacks from waterways. ▪ Waste water systems are designed to avoid pollution to waterways. ▪ Design roads to minimise cut and fill, soil erosion and tree preservation. 	<ul style="list-style-type: none"> ▪ New buildings are proposed to areas of the site already disturbed and sited in a manner that does not impact upon the heritage values of the site and North Head. ▪ Bushfire management of the site is currently provided by APZs on the adjacent National Park land and will continue to be maintained by AIPM as agreed between NPWS and the AIPM. ▪ Impacts to Spring Cove are managed by the siting of development well beyond the site’s foreshore and within existing developed areas. Proposed stormwater run off control measures are designed to improve the quality of stormwater runoff from the site and include the establishment of a natural creek bed and macrophytic planter beds to act as a filter for stormwater to Spring Cove. ▪ Waste water systems will connect with existing reticulated services. ▪ The topography of the site will be largely retained as construction works will require minimal cut and fill. Internal roads will be confined to existing cleared areas of the site and will not require extensive cut or fill. The new carpark to the south will require an extent of fill in part by up to 1.7m.
<p>Visual Sensitivity.</p> <ul style="list-style-type: none"> ▪ Minimise visual impacts particularly from the foreshore. Built forms of a group of smaller buildings are preferred to one large building. ▪ Avoid buildings on headlands or prominent view lines. Locate buildings on edges of valleys or side slopes in the landscape. 	<ul style="list-style-type: none"> ▪ The proposed built forms represent an appropriate addition to North Head – new accommodation is to be contained within two separate building forms. ▪ The removal of existing buildings in front of the Axial Hospital Group building will enable unencumbered views of the heritage building from the harbour. ▪ The development scheme will adopt 2 storey forms in accordance with the submitted HHMP. Buildings are sited further south to the site to minimise the visual impact from the harbour. Refer to photomontages in Appendix C.
<p>Edges to the water and natural areas</p> <ul style="list-style-type: none"> ▪ Generally pedestrian only access to the coastal edge, via defined and identifiable pathways. 	<ul style="list-style-type: none"> ▪ No changes to existing access to Spring Cove.

Desired Future Character	Comment
<p>Access</p> <ul style="list-style-type: none"> ▪ Isolated coastal dwellings generally have private access road. ▪ Series of connected pedestrian pathways connecting buildings, including raised pathways, within the development that limit access to more sensitive natural areas. 	<ul style="list-style-type: none"> ▪ Access to the site remains as existing from Collins Beach Road. ▪ Retention of existing pedestrian pathways and introduction of new access routes into new buildings. Retention and embellishment of the Jetty Road layout to allow heritage interpretation of the site.
<p>Buildings</p> <ul style="list-style-type: none"> ▪ Isolated buildings strongly respond to their natural setting. Relates and responds to the environmental, climatic and siting conditions. Buildings may be raised off the ground to avoid disturbance to vegetation, rock outcrops and soil. ▪ Buildings sited to retain the coastline's natural character. ▪ Bulk, scale and footprint is minimised. ▪ Design, materials and colours respond to the natural setting. ▪ Buildings and infrastructure are located, designed, constructed and managed to achieve environmental sustainability and ecological sensitivity for water and land resources. 	<ul style="list-style-type: none"> ▪ New buildings are proposed to the south and southwest areas of the site away from the sensitive northern boundary. ▪ Siting of proposed buildings and removal of existing buildings enables unencumbered views of Axial Hospital Group building from harbour and new appreciation of the original site use/layout. ▪ Relative to existing development on the site, the Preferred Project Scheme provides for an increase in floor space of 604sqm and a minor increase in building footprint by 19sqm, due to the proposed two storey configuration of the revised scheme. ▪ Buildings are designed to optimise the climatic characteristics of the site. ▪ External finishes are selected to complement the heritage buildings on site and the natural surrounds. ▪ ESD principles adopted in building design and infrastructure.
<p>Heights</p> <ul style="list-style-type: none"> ▪ Limit buildings to up to 2 storeys. 	<ul style="list-style-type: none"> ▪ New development is limited to two storeys.

Design principles of the Policy aim to achieve the identified future character for coastal settlements. The application of these principles relative to the proposal is assessed in the table below:

Design Principles	Comment
<ul style="list-style-type: none"> ▪ Defining the settlement footprint; ▪ To control coastal sprawl, the guidelines recommend the following principles in which coastal settlement can accommodate development: ▪ No or limited development; ▪ Maintaining a compact settlement footprint; ▪ Expanding the boundary of a settlement; or ▪ Creating a new settlement. 	<ul style="list-style-type: none"> ▪ The proposal maintains the settlement footprint of North Head and Manly through responding to the first principle, by confining development to and within an existing developed site.
<ul style="list-style-type: none"> ▪ Connecting open spaces; ▪ Connect new and existing open spaces to maintain environmental protection areas, the scenic values of the visual catchment and remnant vegetation. ▪ Establish continuous ecological corridors. ▪ Provide appropriate setbacks for protection from hazards such as bushfire. ▪ Preserve settings for places of cultural heritage within the open-space network. 	<ul style="list-style-type: none"> ▪ No impact to the existing connectivity of surrounding National Park areas as development is confined to the existing developed site. ▪ Improved ecological corridors through the site by the removal of existing accommodation buildings adjacent to current bandicoot foraging areas and reinstatement as landscaped areas for further foraging opportunities.

Design Principles	Comment
	<ul style="list-style-type: none"> ▪ Bushfire protection will be provided through maintaining existing APZs and a combination of bushfire management risk measures such as adopting minimum construction standards and setback of buildings from site boundaries. ▪ Key outcomes of the Preferred Project Scheme is the removal of non heritage buildings to the north of the Axial Hospital Group building that will provide unencumbered views of the heritage building from the harbour. Further key heritage outcomes include the retention of all heritage cottages and the alignment of Jetty Road.
<ul style="list-style-type: none"> ▪ Protecting the natural edges ▪ Maintain foreshore areas and setbacks in public ownership. ▪ Protect existing and remnant native vegetation by generous setbacks and defined points of access. ▪ Manage land use impacts to maintain ecological integrity of vegetation on foreshores; coastal habitats; visual amenity and improvement of water quality. 	<ul style="list-style-type: none"> ▪ No impact to the foreshore area and associated vegetation as development is limited to the upper areas of the site that are currently cleared and utilised for AIPM operations. ▪ Operational environmental management procedures are to be implemented as part of the upgrading of AIPM facilities in respect to maintaining ecological integrity of the Little Penguin habitat and foraging areas of the Long-nosed Bandicoot. Measures to control pest plant and animals occurring on the site further aim to improve the ecological integrity of the site. Water quality improvement measures entail stormwater run off systems that aim to improve quality of stormwater run off. ▪ The visual and scenic amenity of the coastal foreshore is enhanced through limiting proposed buildings to the south of Jetty Road and reinstatement of an unencumbered view to Axial Hospital building from the harbour.
<ul style="list-style-type: none"> ▪ Appropriate buildings in a coastal context. ▪ Locate and design buildings to respond within local context. ▪ Provide buildings appropriate in terms of location, uses, scale, height and site configuration. ▪ Rationalise car related uses on site e.g. driveways, widths and lengths. ▪ Ensure developments and neighbouring properties have access to daylight, natural ventilation, privacy (visual and acoustic), private open space, pleasant microclimate. ▪ Prominent coastal sites should: ▪ Recognise the significance of the site to the local or regional area. ▪ Redevelopment should be no bigger in scale FSR, height, footprint than existing development. ▪ Ensure development does not degrade adjoining public open space by reinforcing public and active uses; provide setbacks sufficiently; reinforce public uses along and within public land. ▪ Mitigate overshadowing of public open spaces; ▪ Ensure buildings have well articulated and scaled elevations. 	<ul style="list-style-type: none"> ▪ Preferred Project Scheme entails the siting of new buildings and retention of key heritage buildings to respond to the heritage significance of the site and North Head by adopting appropriate building setbacks, footprints and height relative to the local and regional historic, visual and environmental context. ▪ The development scheme will adopt a building height of 2 storeys to limit building footprint and maximise landscape area. ▪ Vehicular access areas and car parking are proposed predominantly to the rear areas of site to minimise visibility of paved surfaces from coastal vantage points. Minor extension of parking area within the eastern setback of the Axial Hospital Group building to rationalise parking layout to improve aisle width. ▪ No amenity impacts to residential properties due to the isolated nature of the site. ▪ Development is limited to an existing developed lot and represents an increase in floor space by 604sqm and a minor increase in building footprint by 19m2. Overall the development scheme represents a minor increase in floor area relative to the extent of site area, from an FSR of 0.2:1 to 0.237:1.

Design Principles	Comment
	<ul style="list-style-type: none"> ▪ No impacts to adjoining public open space by adopting appropriate setbacks and confining development to existing cleared areas of the site that are currently utilised by AIPM. ▪ Appropriate built form scale and design relative to existing historic buildings on site.

The revised proposal is consistent with the above statutory provisions, design principles and policies. The key considerations to note are:

- Relative to existing development on the site, the Preferred Project Scheme provides for an increase in floor space of 604sqm and a minor increase in building footprint by 19sqm, due to the proposed two storey configuration of the revised scheme demonstrating the proportion of building footprint area is to be generally unchanged.
- Ecological considerations represent a beneficial outcome through the removal of buildings north of the Axial Hospital Group which will provide for additional foraging area for the Long nosed Bandicoot in the north and removal of development in the general proximity of the Little Penguin colony. New buildings are proposed to the south of jetty road alignment which provides a further setback from the Little Penguin colony.
- The stormwater management system for the site has been designed such that it improves upon the existing system through the provision of stormwater pollution control measures and the establishment of a natural creek bed that will provide for natural filtration mechanisms and improved quality of stormwater run-off that will benefit terrestrial and aquatic habitat.
- The development entails appropriate building heights, setbacks, site cover and external materials and finishes that are appropriate to the coastal context of the site and do not detrimentally impact upon the foreshore and adjoining open spaces.
- Existing significant landscape, cultural and scenic elements of the site will be maintained through the retention of all heritage significant buildings and appropriate siting of new built forms.
- The proposal enhances the heritage qualities of the site through the retention and preservation of all significant heritage buildings to be guided by a Historic Heritage Management Plan.
- Whilst the North Head locality comprises a number of heritage items listed under the Manly LEP, the proposed works are located away from other such items such that there will be no impact. Proposed works are confined to within areas already occupied for the current use and will entail minimal excavation works. Aboriginal archaeological investigations indicate that a rock shelter has been recorded to exist along the cliff face of the site.
- The scenic quality of Sydney Harbour will be maintained by built form additions of a suitable scale and form to minimise visual impact.
- The proposed development is confined to the existing developed areas and will not impact upon the existing foreshore access to Collins Beach.
- The site is currently serviced and future development will be accommodated in accordance with Sydney Water requirements.
- Ecological Sustainable Design principles are to be incorporated into the proposal's design in order to assist in conserving the environment and meeting general policy requirements.



6 Response and Actions to Key Issues

6.1 Overview

This section of the PPR outlines the key issues arising from both the initial assessment of the Project Application by DoP, DEWHA, other public authority agencies and a review of each of the submissions arising from the public notification process.

The key matters raised by the DoP and DEWHA during the preliminary assessment of the Project Application were articulated through general discussions as outlined in Section 2 and through correspondence. A comprehensive response to each of these matters is contained within this section.

The issues raised by other public authorities, non – government agencies, local interest groups and surrounding residents during the notification of the Part 3A application and during previous Commonwealth exhibition processes are also addressed within this section and the Response Table in Section 6.5.

It is noted that the AFP has found the feedback to be constructive and has made significant amendments to the design scheme and revision to the Statement of Commitments to address the issues raised.

6.2 Key Issues

The initial assessment of the application by the DoP and DEHWA identified the following key issues required to be addressed:

- Impacts to the Little Penguin and the Long Nosed Bandicoot;
- Impacts to the site's heritage values;
- Mitigation of *Phytophthora cinnamomi*;
- The submitted Construction and Operational Environmental Management Plans should be reviewed;
- Further assessment relative to Commonwealth guidelines;
- The Draft Heritage Conservation Management Plan should be reviewed relative to Commonwealth provisions;
- Preparation of a Vegetation Management Plan;
- Asset Protection Zone arrangements; and
- Built form/ visual impacts.

6.3 Response to Key Issues

6.3.1 Impacts to the Little Penguin

The potential impacts to the Little Penguins were a key issue identified by DEWHA and all interested parties. DEWHA recommended that the proponent refer to advice submitted by the NSW Department of Environment and Climate Change (DECC) in respect to incorporating additional measures outlined in the DECC advice relating to footprint, monitoring, construction times and noise and light barriers.

In particular, DECC noted that the location and orientation of the Senior Common Room and cottages would generate noise and light levels, whilst the separation of the kitchen and Common Room would increase noise from staff movements between the buildings.

As such, DECC advised that the proposal should not encroach any further north towards the Little Penguin nesting areas than the location of existing structures and recommended that the development be redesigned to reduce the footprint on the northern edge of the site.

Other considerations raised included providing more specific detail in regard to mitigation and monitoring measures relative to the Little Penguin in the submitted Contamination Environmental Management Plan (CEMP) and the Operational Environmental Management Plan (OEMP). In particular, DECC advised:

- A longer monitoring period of Little Penguin is required: weekly for the first three months of construction if the construction takes place during the breeding period.
- Alternatively, if construction takes place outside the breeding season, weekly monitoring at commencement of breeding season and continue for three months.
- No construction on the vicinity of the known nesting areas, on the northern section of the site, during the breeding period of July to February. However, DECC advised that some construction may be possible in this period if breeding is not occurring, depending on the results of the monitoring and in consultation with DECC.
- Greater details needed in relation to the noise and light barrier which is proposed to be constructed between the cottages and the foreshore. DECC requires that it be a permanent fixture and designed to facilitate fauna movement.

In response to the above issues, the layout of the previous scheme has been redesigned to limit new built forms south of Jetty Road only, which results in the following outcomes:

- No encroachment further north towards the Little Penguin nesting areas than the location of existing structures and the reduction of building footprint on the northern edge of the site through the removal of existing accommodation buildings in this area.
- Considerable setbacks from the cliff line and thus from the penguin colony, achieving a distance of approximately 27m at the minimum point between the proposed west classroom building and the top of the cliff line, in comparison to the previous siting of buildings that were located north of Jetty Road.
- No new structures to the north of the Axial Hospital Group building and therefore no operational activities between this building and the cliff line except for the adaptive reuse of Spring Cove cottage and Kookaburra cottage.
- The Senior Common Room facilities are proposed within the Axial Hospital Group building, in which this building is currently setback from the cliff edge by some 35m to 37m. This distance is a significantly greater setback to the cliff line in comparison the previously proposed location of the Senior Common room.
- The kitchen and proposed dining areas are located immediately adjacent to each other and contained within the Axial Hospital Group Building and therefore staff movements between these facilities will be internal. In addition, the kitchen is also to be located in close proximity to the Senior Common Room.
- In response to DECC and DEWHA concerns relating to monitoring periods, construction and noise and light barriers, these considerations have been incorporated in the CEMP and OEMP and is discussed in Section 6.3.4. It is noted that the existing dormitory buildings in front of the Axial Hospital Group Building will be retained during the construction period to function as a noise and light barrier and will be demolished outside the breeding, and moulting periods.
- A further assessment of the Preferred Project scheme has been undertaken by AHA Consulting and findings identify that:
 - The proposal is not likely to affect the lifecycle of the Little Penguin population as:

- Breeding habitat would not be removed as part of the proposal and construction will not occur in the area known to support breeding habitat.
- The revised scheme provides additional setback from the northern breeding areas.
- Measure to prevent stormwater runoff and sedimentation are to be implemented.
- Proposed staged construction programme to take into consideration penguin breeding and moulting periods.
- Management measures provided in the CEMP and OEMP for construction and ongoing operations.

6.3.2 Impacts to the Long Nosed Bandicoot

The potential impact to the Long Nosed Bandicoot was another key ecological issue identified by DEWHA and all interested parties. DEWHA considered that proposed measures to protect the Long-nosed Bandicoot were inadequate and recommended that the proponent refer to advice submitted by the DECC in respect to offsetting, monitoring, traffic and site excavations as follows:

- DECC does not support the statement that the two large car parking areas in the south-east and south-west of the site have been located in the least sensitive locations on the site.
- There is no evidence to indicate bandicoots will forage under the raised buildings; the proposed 'green fingers' and grass growing through 'turf cell'. Mitigation measures are not considered to provide foraging habitat that is equivalent to the habitat currently on the site.
- Provide measures in the CEMP and OEMP to reduce impacts of increased traffic, including reducing speed levels along the access road.
- Provide further detail in terms of site excavation and the mitigation measures in regards to the presence of pits and holes.
- No offset measures are proposed for the loss of foraging habitat area. Reduction to foraging habitat should be offset by an increase in foraging habitat elsewhere on North Head. Alternatively, DECC recommended a reduction to the footprint so no structures are closer to the northern boundary than the location of the existing structures; or an exclusion area of at least 15 – 20m be provided.

Other considerations included providing more specific detail in regard to proposed performance measures identified in the submitted Construction Environmental Management Plan (CEMP) such as:

- Required monthly monitoring periods for three months prior to construction and continue monthly for three months after commencement of construction. Also monitor digging activity.
- Training required for contractors representative in handling and removing bandicoots from trenches. A performance measure should be included in the CEMP if bandicoots are frequently found in pits and trenches, then other measures need to be introduced.

As discussed in Section 4, the site layout of the Preferred Project Scheme is redesigned to address potential impacts relative to fauna. The limitation of new built forms south of Jetty Road achieves the following outcomes relative to the Long-nosed Bandicoot which is not a species listed under the Commonwealth, but NSW Legislation:

- No new structures to the north of the Axial Hospital Building and therefore no operational activities between this building and the cliff line except for the adaptive reuse of Spring Cove cottage and Kookaburra cottage.
- The removal of existing accommodation buildings in this area enables an increased foraging area for the bandicoot of some 470m² to the north of the Axial Hospital Building, adjacent to the existing northern foraging area.

- The kitchen and proposed dining area are located immediately adjacent to each other and contained within the Axial Hospital Group Building and therefore staff movements between these facilities will be internal.
- Incorporation of measures in the CEMP and OEMP to reduce impacts of increased traffic, including reducing speed levels along the access road and further detail in terms of site excavation and the mitigation measures in respect to pits and holes.
- A further assessment of the Preferred Project scheme has been undertaken by AHA Consulting and findings identify that:
 - The Long-nosed bandicoot focuses their feeding activity on the northern lawn in front of the current accommodation building. This foraging area is considered an important resource and the proposal would expand this area by removing the current accommodation buildings.
 - Management of vehicle movements during construction and operations.
 - Implementation of management measures to minimise disturbance during post construction as contained within the CEMP and OEMP.

6.3.3 Mitigation of *Phytophthora cinnamomi*

The potential for introduction of *Phytophthora cinnamomi* (PC) on the site through future construction and continued use of the site has been raised by several government agencies.

DEWHA has indicated that the *Phytophthora* Dieback Management Plan is to be based on “*National Best Practice Guidelines documented in Management of Phytophthora cinnamomi for the Biodiversity Conservation in Australia Part 2 – National Best Practice Guidelines*”.

In contrast, DECC advised that the proposed mitigation measures contained with the previously submitted CEMP and OEMP were considered to be adequate. Notwithstanding, the revised CEMP and OEMP have been modified by providing for the preparation and implementation of a PC Dieback Management Plan based on the document “*Management of Phytophthora cinnamomi for the Biodiversity Conservation in Australia Part 2 – National Best Practice Guidelines*” as requested by DEWHA. Refer to the revised CEMP and OEMP for further detail in Appendix E.

6.3.4 The submitted draft Construction and Operational Environmental Management Plans

As identified above, DEWHA and DECC advised that the submitted draft Construction and Operational Environmental Management Plans requires further refinement, including further performance indicators and management details required in the CEMP and OEMP.

Gondwana Consulting has amended the CEMP and OEMP in consultation with AHA Consulting to provide the additional details and is submitted under Appendix E. Key amendments entail:

- Provision of monitoring period of the Little Penguin entailing weekly monitoring of start of demolition/construction works and will take place weekly for first three months of activity. After this time monitoring frequencies will revert to fortnightly, including during the breeding and moulting season, or as consistent with DECC/NPWS established monitoring program.
- Demolition of the existing northern accommodation buildings will be demolished following substantial completion of construction works and will only occur outside Little Penguin breeding season (July to February) and the moulting period (from approximately February to the end of April). Subject to DECC/NPWS approval, removal of these buildings may occur within these periods if breeding is not occurring.
- The existing northern accommodation buildings will function as noise and light barrier during construction phase.

- Preconstruction monitoring periods of the Long-nosed bandicoot will occur for three months and will continue for first three months of demolition and construction.
- Appropriate personnel will be trained on the handling of the Long-nosed bandicoot as approved by DECC/NPSW.

6.3.5 Impacts to the site's heritage values

Considerable comments from government agencies and the community have been received in respect to the potential impacts to the heritage value of the site and North Head. In particular, DEWHA identified that:

- Additional elements of the site should be protected and conserved to ensure overall heritage values of the site are not lost, such as retaining the isolation hospital link to the former Quarantine Station.
- Retain Kookaburra, Garden and Harbour Cottage and no overbuilding / obscuring alignments of Jetty and Quarantine Station Roads to allow for interpretation of the former facility as a representation of a past practice.

The NSW Heritage Office provided comment in respect to:

- Details on whether other structures of European archaeological interest remain, such as wells or dumps.
- Impacts relating to removal of buildings of high significance such as Staff Cottage (Harbour Cottage) and building over jetty road. Require site interpretation of jetty road if jetty road to be built over.
- The proposed new buildings to the west and south-west of the hospital would have some adverse heritage impact by removing or relocating early buildings and replacing them with larger buildings.

Meetings with DEWHA were undertaken to present draft alternatives to resolve the heritage issues as discussed in Section 2. Positive responses were received in respect to the revised option which specifically provides for:

- Retention of Kookaburra, Garden and Harbour Cottage, as well as Spring Cove Cottage. The Heritage Conservation Management.
- No overbuilding / obscuring alignments of jetty road. The Historic Heritage Management Plan includes recommendations for the retention of the former jetty road and its recovery as open space as far as possible together with provision of heritage interpretive material. This is proposed as part of the Preferred Project Scheme.
- Archaeological Investigations by Casey Lowe Pty Ltd relating to the former quarantine station road were undertaken and it was identified that the actual alignment of this road, which dates from after the 1920s is not early and original (refer to Appendix L). However, the Historic Heritage Management Plan includes recommendations for the retention and recovery as open space. The recommendation also notes that the road may be partly developed providing that a physical link between the two institutions is retained. It was further recommended that heritage interpretive material be provided on site. This is proposed as part of the Preferred Project Scheme.

NBRS&P has undertaken an assessment of the heritage impacts upon the site and surrounding heritage items, as contained with the Statement of Heritage Impact (SHI) in Appendix F. The impact of the proposal is assessed against Historic Heritage Management Plan also submitted with the PPR and includes a visual impact assessment. The SHI has been informed by the NSW Heritage Office's guidelines and the 'Significant Impact Guidelines' of the Commonwealth DEWHA. In summary, the key findings of the SHI indicate that overall, the proposal respects and enhances the heritage significance of the place by the following measures:

- The preferred project scheme entails removal of structures that have lesser significance and retention and adaptation of structures of higher significance.

- New structures are designed with common forms and materials which are introduced in a manner that retains both the core heritage fabric and the setting of the whole complex as an isolated, harbourside, bushland setting.
- The setting of the core Axial Hospital Group is largely restored by the removal of more recent structures to the north of them and the recovery of open space between the group and the water.
- The proposed development generally satisfies the recommendations of the Historic Heritage Management Plan for the site and therefore has an acceptable impact on the heritage values.
- The adaptation of the Axial Hospital Group continues earlier adaptive responses to the original wards. The retention and adaptation of the linked ward pavilions as is a minor and acceptable impact on the heritage value of the place. The adaptation is recommended to be augmented with interpretation explaining the nature of the adaptation and the significance of the place.
- The cottages are to be retained and preserved in their existing state and this approach will have no adverse impact on their heritage values.

6.3.6 Heritage Conservation and Management

The draft Historic Heritage Management Plan (HHMP) submitted with the Environmental Assessment Report was prepared to address both Commonwealth and the NSW Government guidelines in view of the bilateral assessment process. The content and format of the draft HHMP has been raised by both NSW and Commonwealth agencies, with some conflicting views.

DEWHA Heritage officers advised that the draft HHMP focuses on individual elements and items rather than the overall significance of the place. It was also recommended that the draft HHMP be revised to meet the provisions of the EPBCA. The specific issues raised by DEWHA are summarised in the Response Table in Section 6.5.

The NSW Heritage Office identified that the HHMP and Heritage Impact Statement have not been prepared in strict accordance with the NSW Heritage Office guidelines. However, the NSW Heritage Office accepted the recommendations of the HHMP by NBR&P subject to the inclusion of additional considerations, summarised in the Response Table in Section 6.5.

In view of the bilateral assessment and range of comments from government agencies, DoP officers have suggested that the revised HHMP be prepared with emphasis towards the Commonwealth expectations in terms of content but to ensure that cross referencing to the NSW provisions be included. A Historic Heritage Management Plan (HHMP) a revised version of the HHMP has been prepared by NBR&P and is submitted under Appendix F. The comments arising from both Government agencies have been considered in the revised version and have been generally included within the revised report to the effect that the document is more conservative than the previous document. This is reflected through the following key recommendations:

- Retention of the former staff cottages including Harbour Cottage, Kookaburra Cottage and Garden Cottage in addition to the Axial Hospital building.
- The restriction of new buildings from the north of the Axial Hospital Group.
- Retention of the boundary wall, jetty road and the alignment or interpretation of the Quarantine Station Road.
- Obligations for the AFP arising from the EPBCA in respect to preparation of a heritage strategy, inclusion on an AFP heritage register, and consideration for inclusion in the Commonwealth Heritage list.

6.3.7 Preparation of a Vegetation Management Plan

The NSW Maritime recommended the preparation of a Vegetation Management Plan (VMP). To determine the extent and content of the VMP, the National Parks and Wildlife Service (NPWS) was consulted in respect to ecological considerations of the site.

It was advised that a VMP is not required due to the ecological sensitivity of the Little Penguin colony in which the NPWS stated to “do nothing”, that is, no clearing of vegetation in the Little Penguin Habitat. A bushfire management will be prepared and this will include the vegetation management of the site.

6.3.8 Asset Protection Zones and the Sydney Harbour National Park

Comments with respect to proposed Asset Protection Zones (APZs) and bushfire management were widely received. In particular, DECC raised that:

- The recommended APZ is not able to be accommodated in the area around Garden Cottage and along parts of the eastern boundary.
- Along parts of the eastern boundary with SHNP, the APZ must be within 3m.
- Any further encroachment with an APZ into SHNP along the southern boundary must not occur.
- A Strategic Fire Protection Zone is not necessary.
- A Bushfire and Vegetation Maintenance Plan should be developed in consultation with local fire authorities and DECC.

Consultation has taken place with DECC and the NSW RFS Development Control Unit in respect to the bushfire management. An effective package of fire protection and bushfire mitigation measures for the subject development site is proposed, as discussed in the Bushfire report at Appendix G.

This report has considered all of the elements of bushfire attack and the compensation measure listed are only of value and capable of providing the required protection from bushfire attack if they are considered as a complete package. This includes the retention of the existing APZ arrangements on SHNP adjacent to the site; provision of a suitable water supply; vehicular access and egress; emergency and bushfire maintenance planning/management; and construction standards.

Provided the proposed development is constructed in accordance with the recommendations as described through the report it is considered that the proposed new, redeveloped and retained buildings can reasonably satisfy the objectives and performance requirements of the Building Code of Australia, AS3959 and the aim and specific objectives of NSW Planning for Bushfire Protection 2006.

It is also noted that the final and completed construction of the subject development would afford a greater level of bushfire safety protection, for both buildings and occupants, than as currently exists within the subject development site. The subject development will provide an improved outcome for bushfire safety by the application of the principle ‘*measures in combination*’.

6.3.9 Built form / visual impacts

The Preferred Project Scheme represents an appropriate outcome in terms of visual impact and scenic amenity, as illustrated by the attached Photomontages in Appendix C. Key matters to note in the consideration of the visual impacts are as follows:

- The removal of two dormitory non heritage buildings in front of the heritage Axial Hospital Group building enables new appreciation of this heritage building from the harbour and public domain area including from Collins Beach. This also enables a new appreciation of Spring Cove and Kookaburra cottages without the presence of buildings on either side.
- Harbour cottage is retained and therefore remains as part of the group of buildings visible from the harbour.
- The enlarged expanse of lawn area in the foreground of the site and location of all new buildings behind Jetty road a new visual appreciation of heritage buildings in the site’s foreground.

- The proposed 2 storey forms are similar in height to the two storey forms of existing development on the site. The Administration building is proposed to be a maximum RL 25.21 which is below the height of the topmost point of the library building, RL 26.10 and similar to the height of the library roof ridgeline of RL 24.62. The proposed accommodation building heights range from RL 22.70 to RL 23.90 which are both lower than the height of the library building. These proposed heights ensure that the height of the library building will be viewed as the highest building on the site.
- Proposed roof material and external wall finishes / colours will blend in with the surrounds so as not to compete with existing buildings and their roof forms and be complementary to the SHNP background. Proposed colours/finishes are also complementary to the heritage buildings on the site and aim to achieve the “interpretation” of the new built forms relative to heritage buildings on the site. Appendix A provides the proposed (or similar) colour and finish details.
- Vegetated ridgelines of SHNP will be retained with no building forms to extend above existing line of building heights.
- The proposed accommodation buildings are sited behind one another and therefore when viewed from the north, the extent of these buildings are minimised.
- The 2 storey height achieves the floor space required whilst minimising building footprint. Relative to existing development on the site, the Preferred Project Scheme provides for an increase in floor space of 604sqm and a minor increase in building site cover by 19sqm, due to the proposed two storey configuration of the revised scheme. Overall, the development scheme represents a minor increase in floor area relative to the extent of site area, from an FSR of 0.2:1 to 0.237:1.

The visual impact assessment by NBR&P also highlights that:

- The site is adjacent to heritage items on all sides and include North Head as a whole (including the Quarantine Station and the AIPM site itself); Manly District Hospital to the northeast; St Paul's College and the Cardinal's Palace across Spring Cove; and the Former Gasworks Site across Spring Cove at Little Manly Point.
- The visual relationships between the site and the above heritage items derive from the views to the AIPM site being read as a group of buildings of generally similar form and materials set above a narrow foreground of woodland above the shore line with a larger rising background of bushland to either side and to the rear of the group.
- The Preferred Project Scheme generally retains the quality of the existing views to the site and retains the foreground and background of bushland setting. The additional buildings will be visible but the resultant visual impact is the retention of the site as a compact and isolated development of one and two storey scale. The earlier visual setting of the northern foreground of the Axial Hospital Group is restored by the removal of two existing dormitory blocks.

In particular, key views to the site are from Collins Beach; the land across Spring Cove; and more distant views from the Harbour west of Manly Point. The photomontages demonstrate the resultant impacts as contained in Appendix C.

6.3.10 Further assessment relative to Commonwealth guidelines

To further assist DEWHA officers with their consideration of the proposed development under the Bilateral assessment arrangements, DEWHA has requested further information required under the Commonwealth legislation and guidelines, particularly in respect to “*Significant Impact Guidelines 1.1 and 1.2*”.

Section 6.4 provides the specific responses and information as sought.

6.4 Commonwealth Guidelines

DEWHA identified specific information required relating to the Commonwealth legislation and guidelines. The table below provides the additional information sought and is also contained within the specialist consultant reports.

Table 7 – Commonwealth Guidelines

Matter	Response
<p><u>3. A description of the relevant impacts of the controlled action</u></p> <p>An assessment of all relevant impacts that the controlled action has, will have or is likely to have on:</p> <ul style="list-style-type: none"> ▪ Threatened ecological communities and threatened species potentially present and listed under section 18 and 18A of the EPBC Act; ▪ Migratory species listed under the EPBC Act; ▪ RAMSAR Wetlands; ▪ Places listed on the National Heritage List and protected under the EPBC Act; and ▪ World Heritage areas. 	<p>Table 3 of the Marine Ecological report provides the marine species listed under the EPBC Act which is relevant to the proposal and includes migratory species. Table 2 provides marine species of conservation significance recorded in the locality listed under the EPBC Act and includes migratory species. There are no threatened ecological communities.</p> <p>Table 2 of the Ecological Assessment report provides the Threatened flora and fauna species recorded within the locality or with the potential to occur. There are no endangered ecological communities.</p> <p>The closest RAMSAR wetland is in Towra Point, Botany which is located at distance from the site that this wetland would not be affected.</p> <p>The Heritage reports identify the site is listed on the National Heritage list as part of a larger listing of the greater part of North Head. It is noted that while the land is included in this listing, the listing partly excludes the former Seaman’s Isolation Hospital from one of the assessed values.</p> <p>The site is not a declared World Heritage area.</p> <p>An assessment of the impacts upon the above marine, ecological and heritage values of the site is contained within the:</p> <ul style="list-style-type: none"> ▪ Marine Ecology Assessment and the Ecological Assessment reports by Alison Hunt and Associates Pty Ltd; and ▪ Statement of Heritage Impact and Historic Heritage Management Plan by NBR&P.
<p>Information must include:</p> <p>(c) a statement whether any relevant impacts are likely to be unknown, unpredictable or irreversible</p>	<p>Failure to implement the CEMP, OEMP or Erosion and Sedimentation Control Plan could result in irreversible impacts to the Little Penguin and the Long nosed bandicoot and therefore is recommended that these mitigation measures be implemented stringently.</p> <p>In terms of the marine environment, failure to implement the CEMP, OEMP or Erosion and Sedimentation Control Plan could result in predictable detrimental impacts to the marine environment but impacts are considered to be reversible. Notwithstanding, it is recommended that these mitigation measures be stringently implemented.</p>

Matter	Response
	<p>Unpredictable and irreversible impacts relating to the proposed opening in the western wall (an internal wall) of the eastern most pavilion ward of the Axial hospital building could occur on the basis of not knowing the extent and condition of the original fabric before invasive investigation. The opening in the wall may or may not be reversed without loss of original fabric. However, the opening could be built up at a later stage in matching materials.</p>
<p>(d) analysis of the significance of the relevant impacts</p>	<p>The considerations to Significant Impact Guidelines 1.1 and 1.2 have been addressed in the Ecological and Heritage reports.</p> <p>An assessment of the impacts upon the above marine, ecological and heritage values of the site is contained within the:</p> <ul style="list-style-type: none"> ▪ Marine Ecology Assessment and the Ecological Assessment reports by Alison Hunt and Associates Pty Ltd; and ▪ Statement of Heritage Impact and Historic Heritage Management Plan by NBR&P.
<p>(e) any technical data and other information used or needed to make a detailed assessment of the relevant impacts.</p>	<p>Review of the proposed stormwater management strategy and erosion and sediment control plan.</p> <p>Review of the CEMP and OEMP.</p> <p>Review of the Australian Federal Police – Australian Institute of Police Management North Head – Heritage Assessment dated March 2006 by Peter Freeman Conservation Architects & Planners Consultant Team.</p>
<p>4. Proposed safeguards and mitigation measures (a) A description, and an assessment of the expected or effective of, the mitigation measures</p>	<p>An assessment of the impacts upon the above marine, ecological and heritage values of the site is contained within the:</p> <ul style="list-style-type: none"> ▪ Marine Ecology Assessment and the Ecological Assessment reports by Alison Hunt and Associates Pty Ltd; and ▪ Statement of Heritage Impact and Historic Heritage Management Plan by NBR&P.
<p>(c) the cost of mitigation measures</p>	<p>Estimated costs entail:</p> <ul style="list-style-type: none"> ▪ CEMP \$200,000 over the life of the construction phase. ▪ OEMP \$15,000 per annum. ▪ Stormwater pollution control measures \$70,000. ▪ Erosion and Sediment Control \$20,000. ▪ Heritage interpretation \$20,000. ▪ Tree Protection \$10,000. ▪ Soft landscaping \$200,000.

Matter	Response
<p>(f) a consolidated list of the mitigation measures proposed to be undertaken to prevent, minimise or compensate for the relevant impacts of the action, including mitigation measures proposed to be taken by State governments, local governments or the proponent.</p>	<ul style="list-style-type: none"> ▪ Stormwater management of the site will be improved through the inclusion of stormwater treatment devices and development of a 'natural creek' to the north of the site and opportunity for filtration of stormwater. Refer to Stormwater report in Appendix J. ▪ Preparation of a HHMP that will form a practical working document to guide future works to AIPM site. This includes consideration of constraints and opportunities and policies to assist in guiding future building works or development. Recommendation for implementing the proposed policies to ensure the significance of the site is retained in any future development or changes to the place are provided. Refer to Historic Heritage Management Plan in Appendix F. ▪ The CEMP and the OEMP provide a range of performance objectives, goals, mitigation measures, performance measures, monitoring/auditing/reporting measures, corrective actions and responsibility for all environmental aspects of the site. These include the Little Penguin Colony, the Long nosed bandicoot, Phytophthora Cinnamomi, heritage buildings and site, and water quality, stormwater and erosion as well as a range of other considerations. <p>Refer to Appendix E for further detail.</p>
<p><u>6. Environmental record of the person proposing to take the action</u></p>	<p>The AFP has not had any litigation matter brought against it.</p>
<p><u>8. Identification of affected parties, including a statement mentioning any communities that may be affected and describing their views.</u></p>	<p>A summary of the government and public submissions in response to the initial Commonwealth process and the NSW Part 3A exhibition process is provided in Section 6 of this PPR.</p>
<p><u>Misc comment on draft documentation.</u></p> <p>Reference to the Ecological report and that omission of Commonwealth guidelines.</p>	<p>These considerations are included in the revised Ecological report in Appendix D.</p>

6.5 Summary of Submissions

This section also provides a summary and the proponent response of the submissions received from government, residents and non-government organisations arising from the exhibition process under the Part 3A provisions and the comments received associated with the Commonwealth PWC assessment process that had occurred prior to the commencement of the NSW Part 3A application, and as requested by DEWHA officers. These earlier comments reflect a superseded scheme but the key issues raised at the time are provided and responded to with consideration to the Preferred Project Scheme.

Government agency comments in response to the Part 3A referral process and the Commonwealth assessment process is included within the table, however the responses refer to the previous section of this PPR.

Table 8 – Summary of Submission to Project Application

Agency/Submitter	Issues	Proponent Response
<p>Department of Environment, Water, Heritage and the Arts (DEWHA)</p>	<p>Little Penguins</p> <ul style="list-style-type: none"> ▪ Incorporate additional measures outlined in DECC advice relating to footprint, monitoring, construction times and noise and light barriers. ▪ More specific detail is required in regard to mitigation measures in the CEMP and OEMP. ▪ Has a Penguin expert been consulted concerning the adequacy of the proposed performance measures contained in the CEMP? ▪ Monitoring regimes proposed in the CEMP for penguin numbers need to be more clearly defined. ▪ In general, terms used are too vague and precise definitions are needed in the CEMP. 	<p>These matters are addressed in Section 6.3.1 and by the revised CEMP and OEMP (prepared in consultation with AHA Ecology) submitted with the PPR.</p>
	<p>Long Nosed Bandicoot</p> <ul style="list-style-type: none"> ▪ Proposed measures to protect the bandicoot inadequate. Adopt the DECC advice relating to offsetting, monitoring, traffic and site excavations. ▪ Has a Bandicoot expert been consulted concerning the adequacy of the proposed performance measures contained in the CEMP? ▪ Proposed measures in the CEMP are too vague making them impossible to audit. ▪ A higher level of clarity and specification needs to be provided in the CEMP in terms of the actions to be carried out. 	<p>These matters are addressed in Section 6.3.2 and by the revised CEMP and OEMP (prepared in consultation with AHA Ecology) submitted with the PPR.</p>
	<p>Heritage Values</p> <ul style="list-style-type: none"> ▪ Additional elements of the site should be protected and conserved to ensure overall heritage values of the site are not lost eg retaining isolation hospital link to the former Quarantine Station. ▪ Retain Kookaburra, Garden and Harbour Cottage and no overbuilding / obscuring alignments of Jetty and Quarantine Station Roads to allow for interpretation of the former facility as a representation of a past practice. 	<p>These matters are addressed in Section 6.3.5 and by the revised HHMP and HIS submitted with the PPR.</p>

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<p>Sydney Harbour National Park (SHNP)</p> <ul style="list-style-type: none"> ▪ Encroachment with an APZ into SHNP along the southern boundary should not occur. ▪ Along the Eastern boundary with SHNP, the APZ must be no greater than 3m. This is the existing footprint of the previous disturbance for the creation of and maintenance of the sandstone wall. ▪ A Bushfire and Vegetation Maintenance Plan should be developed in consultation with local fire authorities and DECC. 	<ul style="list-style-type: none"> ▪ These matters are addressed in Section 6.3.8 and by the revised bushfire impact assessment report submitted with the PPR.
	<p>Phytophthora cinnamomi</p> <ul style="list-style-type: none"> ▪ The Phytophthora Dieback Management Plan is to be based on National Best Practice Guidelines documented in Management of Phytophthora cinnamomi for the Biodiversity Conservation in Australia Part 2 – National Best Practice Guidelines. 	<ul style="list-style-type: none"> ▪ These matters are addressed in Section 6.3.3 and by the revised CEMP and OEMP submitted with the PPR.
	<ul style="list-style-type: none"> ▪ Construction and Operational Environmental Management Plans. ▪ Incorporate DECC changes to management plans. 	<ul style="list-style-type: none"> ▪ These matters are addressed in Section 6.3.4 and by the revised CEMP and OEMP submitted with the PPR.
	<p>Noise and Vibration</p> <ul style="list-style-type: none"> ▪ As above, terms used are too vague. Actions need to be more clearly specified in the CEMP. 	<ul style="list-style-type: none"> ▪ These matters are addressed in the revised CEMP and OEMP submitted with the PPR.
	<p>Inadequacies of the EAA</p> <ul style="list-style-type: none"> ▪ Information required in terms of a statement whether any relevant impacts are likely to be unknown, unpredictable or irreversible. ▪ Assessment should be undertaken using the Commonwealth guidelines Significant Impact Guidelines 1.1 and 1.2. ▪ Further details required regarding Phytophthora cinnamoni (Pc) and assessment relative to Significant Impact Guidelines 1.2. Specific mitigation measures to address Pc required in the CEMP and the Operations Environment Management Plan (OEMP). ▪ Further performance indicators and management details required in the CEMP and OEMP. ▪ Information required regarding an environmental record of the person proposing taking the action. 	<ul style="list-style-type: none"> ▪ Additional information relating to the Commonwealth assessment requirements are provided in Section 6.4. ▪ The revised CEMP and OEMP submitted with the PPR provide further detail to mitigation and management measures in respect to Phytophthora cinnamoni. ▪ The visual impacts of the preferred project are discussed in Section 6.3.9.

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Visual impacts of built forms and car parking when viewed from harbour vantage points. <p>Additional review of the Draft Conservation Management Plan</p> <ul style="list-style-type: none"> ▪ Some of the policies in the draft CMP differ in subtle terms to the findings of the other reference documents and can therefore create uncertainty or lead to management misunderstandings. ▪ The document focuses on individual elements and items rather than the overall significance of the place. ▪ No specific reason is provided as to why the Garden Cottage should be retained. ▪ The Boundary Wall (along with Jetty Road and Quarantine Station Road) is found by the Heritage Assessment to be of high significance but the CMP makes no mention of the Boundary Wall. ▪ A conservation policy should be included in the CMP recommending that the AIPM nominate the place to the Commonwealth Heritage List. 	<ul style="list-style-type: none"> ▪ These matters are addressed in Section 6.3.4 and by the revised Draft HHMP and HIS submitted with the PPR. ▪ The site is part of North Head which has Commonwealth Government listing via on the National Heritage List.
	<p>Issues of Historic Heritage Management Plan (HHMP) compliance with the EPBC Act</p> <ul style="list-style-type: none"> ▪ The objectives of the management plan require expanding ensure that its aim is to protect, conserve and transmit the heritage values revealed by the EPBCA. ▪ At the completion of each assessment, a conclusion should state whether the threshold for satisfying the criterion was reached and at what level. ▪ More comprehensive description of the condition and integrity of the heritage values of the place required. ▪ Section 1 to should refer to The Australian National Heritage Charter and Ask First. ▪ More detailed description of the works proposed is required to demonstrate how the works do not have a significant adverse impact on the National Heritage Values. Processes for managing Natural and Indigenous values are required. ▪ Further information required in regard to the extent of public access to the site. 	<ul style="list-style-type: none"> ▪ A revised Draft HHMP is submitted with the PPR to include the DEWHA comments.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Further information required in relation to how AIPM will consult with stakeholders and Department of the Environment and Water Resources (Heritage Division). ▪ Policies should be included on how EPBC Act s.324S and s.341S will be satisfied. ▪ Does not comply with iv) the policies and protocols to ensure that indigenous people participate in the management process. ▪ A policy or policies are needed to address the protocols for the management of sensitive information. ▪ Section 3.7 should make reference to section 3.5 and an obligation to seek expert heritage advice on works proposals at the design stage. ▪ The AIPM is required to establish a heritage register when it prepares its heritage study. ▪ The contents of the Eco-Heritage Masterplan Redevelopment are not stated and its unclear what these are and how they implement the CMP. More specific policies need to be included in the CMP. ▪ Need to include a conservation policy to satisfy EPBC Act s.516A. 	
<p>NSW Department of Environment and Climate Change (DECC)</p>	<p>Little Penguin</p> <ul style="list-style-type: none"> ▪ Proposed orientation of the Common Room and cottages are still unlikely to eliminate the increased noise and light levels. Separation of the kitchen and Common Room will increase noise from staff movements between the buildings. ▪ The proposal should not encroach any further north towards the Little Penguin nesting areas than existing structures and it is required that the development is redesigned to reduce the footprint on the northern edge of the site. If the footprint cannot be reduced then detailed justification will need to be provided. ▪ A longer monitoring period is needed to consider whether trends are occurring: weekly for the first three months of construction if the construction takes place during the breeding period. Alternatively, if construction takes place outside the breeding season, weekly monitoring at commencement of breeding season and continue for three months. 	<ul style="list-style-type: none"> ▪ The Preferred Project Scheme centres upon the re-siting of the proposed buildings such that new buildings will be situated further away from the penguin nesting areas than the current buildings. ▪ Monitoring and construction matters raised by DECC are addressed in the revised CEMP and OEMP submitted with the PPR. ▪ The existing two dormitory buildings north of the Axial Hospital Group Building will function as the noise and light barrier during construction.

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ No construction on the vicinity of the known nesting areas, on the northern section of the site, during the breeding period of July to February. However, some construction may be possible in this period if breeding is not occurring, depending on the results of the monitoring and in consultation with DECC. ▪ Greater details needed in relation to the noise and light barrier which is proposed to be constructed between the cottages and the foreshore. DECC requires that it be a permanent fixture and build to facilitate fauna movement. 	
	<p>Long Nosed Bandicoots</p> <ul style="list-style-type: none"> ▪ DECC does not support the statement that the two large car parking areas in the south-east and south-west of the site have been located in the least sensitive locations on the site. ▪ Proposed foraging areas under raised buildings, proposed 'green fingers' and 'turf cells' are inadequate. ▪ The AHA report states that measures are included in the CEMP and OEMP to reduce impacts of increased traffic and speed limits. No measures not included in the CEMP or the OEMP. ▪ The solutions offered to address the presence of pits and holes during site excavation are inadequate. Training required for AIPM representative in handling and removing bandicoots from trenches. A performance measure should be included in the CEMP if bandicoots are frequently found in pits and trenches, then other measures need to be introduced. ▪ No offset measures have been proposed for the loss of the area of foraging habitat. Reduction in foraging habitat to be offset by an increase in foraging habitat elsewhere on North Head. ▪ Required monthly monitoring periods for three months prior to construction and continue monthly for three months after commencement of construction. Also monitor digging activity. 	<ul style="list-style-type: none"> ▪ A new car park area for 12 cars is proposed at the western end of the southern boundary. This car park area will not be readily visible from the harbour as it will be located behind the accommodation building. The existing car park east of the Axial Hospital building is to be improved by widening the aisle width. Four additional spaces are proposed to the north with a "reinforced turf cell" surface. The widened aisle and additional/new parking areas will occupy existing lawn areas but additional landscaped area will be provided at the northern area of the site through the removal of the existing dormitory buildings. ▪ Foraging areas under raised buildings are deleted. ▪ The revised OEMP submitted with the PPR provide details in respect to traffic management. ▪ The revised CEMP submitted with the PPR provide details in respect to the management of pits and holes during excavation and identifies training of personnel for handling of bandicoots. ▪ Enlarged and enhanced foraging areas are proposed to the northern foraging area. ▪ Monitoring periods have been revised in the CEMP and OEMP.
	<p>Sydney Harbour National Park (SHNP)</p> <ul style="list-style-type: none"> ▪ The recommended APZ cannot be accommodated in the area around Garden Cottage and along parts of the eastern boundary. ▪ Along parts of the eastern boundary with SHNP, the APZ must be within 3m. 	<ul style="list-style-type: none"> ▪ These matters are addressed in the revised bushfire impact assessment report submitted with the PPR. ▪ Preparation of a Bushfire and Vegetation Maintenance Plan is to be developed in consultation with local fire authorities and DECC.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Any further encroachment with an APZ into SHNP along the southern boundary must not occur. ▪ A Strategic Fire Protection Zone is not necessary. ▪ A Bushfire and Vegetation Maintenance Plan should be developed in consultation with local fire authorities and DECC. <p>Other ecological impacts</p> <ul style="list-style-type: none"> ▪ Introduction of Phytophthora cinnamomi, weed invasion, erosion and sedimentation. ▪ Mitigation measures are considered to be adequate. <p>Additional measures required</p> <ul style="list-style-type: none"> ▪ Installation of interpretive signs would be beneficial. ▪ Plants used in landscaping should be propagated from plants of local origin. 	<ul style="list-style-type: none"> ▪ A revised CEMP and OEMP is submitted with the PPR as sought by DEWHA to provide further management and mitigation details relating to Phytophthora cinnamomi. ▪ Appropriate sediment and erosion control practices will be implemented during construction phase as stated in the Draft SoC. <ul style="list-style-type: none"> ▪ An interpretation strategy is proposed as part of the Heritage Management Plan. ▪ Selected plant species will be endemic to the locality as indicated in the proposed landscape scheme submitted with the PPR.
NSW Maritime	<p>Matters to be addressed</p> <ul style="list-style-type: none"> ▪ Where appropriate, further development of foreshore vegetation be considered to entail additional larger shrub species with an outlook to net improvement of the ecological values and habitat quality abutting North Harbour. ▪ A Vegetation Management Plan (VMP) should be prepared. ▪ Access for the proposed works is not to be carried out via the waterway/foreshore. ▪ Implementation of appropriate sediment control systems. 	<ul style="list-style-type: none"> ▪ A revised landscape scheme is submitted with the PPR that includes pockets of low planting to be incorporated between the main building group and the harbour cliff edge for refuge areas for the Long nosed Bandicoot. ▪ Access for proposed works will be restricted to the existing vehicle access point. ▪ Vegetation management will be included as part of the OEMP. ▪ Appropriate sediment control systems will be implemented.
Department of Planning – Heritage Office	<p>Issues</p> <ul style="list-style-type: none"> ▪ Conservation Management Plan and Heritage Impact Statement have not been prepared in strict accordance with the NSW Heritage Office guidelines. ▪ Details on whether other structures of European archaeological interest remain, such as wells or dumps. ▪ Heritage impacts relating to removal of buildings of high significance associated with the former Seaman’s Isolation Hospital including the demolition of B17- Staff Cottage (Harbour Cottage) and building over Jetty Road. Require site interpretation of Jetty Road if Jetty Road to be built over. 	<ul style="list-style-type: none"> ▪ A revised HHMP and SHI are submitted with the PPR with consideration to both the NSW and Commonwealth Guidelines. ▪ A previous European archaeological study of the site conducted by Tony Lowe for the initial Freeman Assessment report indicates to have no archaeological potential as there is no evidence of earlier built structures in the area. The report highlights jetty road and Quarantine Station road, which have been identified in the Heritage Management Plan by NBR&P. ▪ Key features of the preferred project scheme entail the retention of all key heritage buildings, as well as the alignment of Jetty Road.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
<p>NSW Rural Fire Service</p>	<ul style="list-style-type: none"> ▪ The proposed new buildings to the west and south-west of the hospital would have some adverse heritage impact by removing or relocating early buildings and replacing them with larger buildings. 	<ul style="list-style-type: none"> ▪ The revised SHI provides an assessment of the impacts to the remaining heritage significant buildings.
	<p>Recommendations The recommendations in the Conservation Management Plan can be endorsed with the following qualifications:</p> <ul style="list-style-type: none"> ▪ Recommendation 13- internal adaptations of buildings remaining from the Seaman’s Isolation Hospital period should be guided to retain heritage significance. ▪ Recommendations 23-25- a plan showing the graded significance of the landscape elements and a plan showing landscape elements to be removed or affected by the works would allow for thorough assessment of landscape values. ▪ Recommendation 26- a plan showing the location and heritage value of particular views would allow assessment. ▪ Recommendation 28- the former staff cottages are connected to the early phases of the hospital and should be retained with relocation as a last resort. ▪ Recommendation 33-34- the development potential of areas C and D requires further justification, incorporating view analysis. ▪ A full fieldwork survey of the site required. Further plans showing the location and significance of the natural and cultural vegetation should be provided including walls, paths and roads. ▪ A plan showing the heritage significance of all the existing buildings and structures on the site should be submitted. 	<p>The HHMPan has been prepared with consideration to these comments and reflects a more conservative outcome than the previous document.</p>
<p>Manly Council (inclusive of attached Appendices by other parties)</p>	<p>North Head Sanctuary</p> <ul style="list-style-type: none"> ▪ The proposed North Head Sanctuary has not been addressed in the EA. ▪ Integrated management of the site jointly with all other stakeholder/ owner/ managers has not been committed. 	<ul style="list-style-type: none"> ▪ The environmental impact of the proposal has been assessed in the EA. ▪ The ecological management of the site such as monitoring of Little Penguins and Long Nosed Bandicoots will be carried out in consultation with the NPWS.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Negative impacts on the natural and built heritage. ▪ Impacts to the setting of the heritage buildings. ▪ The Heritage Council requested that the original cottages on the site be retained or relocated however the proposal only retains 2 of the original cottages. No comment or policy has been provided on options for retaining the cottages. ▪ Adverse impacts in terms of the proposed removal of early fabric on the remaining significant buildings. ▪ No real work is being done to restore or conserve the structures to an earlier form to enhance their significance. ▪ Removal trees not discussed. Impacts to linkage with SHNP. ▪ Previous adaptations of the original buildings should be reduced and the buildings should be conserved for their heritage significance. 	<ul style="list-style-type: none"> ▪ The heritage management of the site will be implemented through continued consultation with relevant stakeholders for the implementation of the HHMP. ▪ Preferred Project Scheme provides for retention of all original cottages as per Commonwealth and NSW Heritage Officers comments. ▪ Revised heritage impact assessment submitted with the PPR identifies that proposed adoptive reuse to heritage buildings is suitable. ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained. ▪ The majority of trees will be retained. Trees required to be removed include a proportion that is in poor condition, structurally unsound and younger. Refer to the Arborist Development Assessment Report by Moore Trees in Appendix K.
	<p>Land Tenure</p> <ul style="list-style-type: none"> ▪ The use of the site by AIPM is not consistent with the 1910 agreement which allowed the Federal Government permissive occupancy for the purposes of Defence and Quarantine. 	<ul style="list-style-type: none"> ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments.
	<p>Endangered species</p> <ul style="list-style-type: none"> ▪ Impacts to suitable habitat for bandicoots. The precise loss of Long-nosed Bandicoot foraging habitat area is not identified and no assessment is made of the quality of habitat provided by the proposed development. ▪ Concerns over the exempt development provisions under Part 8 of the Major Project SEPP under which AIPM can undertake a number of activities/ works that could significantly impact on threatened species. ▪ The plan for the APZ maintenance burns should incorporate mitigation measures to protect the Red-Crowned Toadlet. 	<ul style="list-style-type: none"> ▪ The preferred project scheme entails relocating the proposed buildings from the grassed areas at the north of the axial hospital group to an area west of the site that currently comprises the existing Senior Common Room and general landscape area. The entails an enlarged foraging area to the north for Long-nosed bandicoots. ▪ The Major Projects SEPP provides for exempt development that may be carried out on land providing that such development is of minimal environmental impact. To undertake such works, it is on the onus of AIPM / AFP that works which fall within the range of exempt development must provide no or minimal environmental impact. These works will be undertaken in accordance with the management measures of the CEMP and OEMP.

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Implement temporary fencing during the demolition and construction periods to exclude bandicoots and penguins construction areas. ▪ No mitigation measures for management of the potential increase in road kill of bandicoot. Recommend traffic calming devices. 	<ul style="list-style-type: none"> ▪ The APZ will be maintained on the site in the manner specified by NPWS/DECC. An existing APZ of up to 10m has been previously agreed between the AIPM and the NPWS and is currently maintained adjacent to the southern and western boundaries. No increase in APZ is required beyond the agreed 10m zone. ▪ Potential habitat for the Red-Crowned Toadlet would remain directly adjacent to existing drainage lines that run through the National Park. ▪ Temporary fencing during the demolition and construction periods will be implemented to protect the Little Penguins from construction areas. The existing dormitory buildings in front of the Axial Hospital Group building will function as a noise and light barrier during construction. ▪ Measures to reduce speed limit for construction traffic is provided in the CEMP.
	<p>Aboriginal Heritage</p> <ul style="list-style-type: none"> ▪ Access for indigenous people should be provided for: ▪ Potential direct and indirect impacts on Aboriginal sites in the vicinity of the site and rocky shoreline. ▪ Impacts on Cultural heritage of North Head. 	<ul style="list-style-type: none"> ▪ The Draft HHMP includes a recommendation that access to be available for indigenous people to maintain cultural traditions. Given the security focussed nature of the AIPM facility, such access is recommended to be provided on an occasional basis. ▪ No Archaeological sites and no Potential Archaeological Deposit sites were identified in the survey area which encompassed the cliff face boundary to the fenced southern boundary. The proposed use will be confined to within the secure boundaries of the site, accessed only from Collins Beach Road. There will be no changes to existing arrangements and therefore Aboriginal sites in the vicinity of the site and rocky shoreline will not be affected. ▪ Refer to Indigenous Archaeological Assessment report in Appendix I for further details.
	<p>Built form/ visual impacts</p> <ul style="list-style-type: none"> ▪ Impacts of proposed building in the south east corner – set building further back. ▪ The visibility of the new buildings will be increased by the use of reflective materials. Final colours for the significant external fabric should be provided with the application. ▪ Impact on the visual qualities on SHNP. 	<ul style="list-style-type: none"> ▪ Preferred Project Scheme entails deletion of the previously proposed pavilion forms north and “in front” of the heritage axial hospital building and proposing visitor accommodation at the western portion of the site. ▪ Selection of external materials has been provided in the EA and can include further consideration to limiting reflectivity and appropriate colours to complement the natural setting. Refer to photomontage.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Impacts of the proposed senior common room in the south west corner of the site - not protect, maintain and enhance visual quality of Sydney Harbour. ▪ Light and noise impacts of the deck of the senior common room and Spring Cove Cottage to Little Penguin nesting areas. ▪ The increased density and scale will create a loss of open undeveloped appearance. ▪ The walkways linking the 13 buildings are unnecessary and limit the amount of space available for tree planting. ▪ Proposed cottages will occupy open space and therefore increase the dominance of the built form along the shoreline. No trees proposed in front of the proposed Cottages. 	<ul style="list-style-type: none"> ▪ Visual impact is further discussed in Section 6.3.9. ▪ Proposed light and noise considerations from the deck of the senior common room are addressed by locating this in the existing Axial Hospital Building. ▪ Noise and light from the Spring Cove Cottage will be limited to visitor accommodation as currently. ▪ Proposed walkways between pavilion forms deleted as part of the amended siting of buildings.
	<p>Traffic and transport</p> <ul style="list-style-type: none"> ▪ The principal access road, Darley Road, is already at capacity and lack of public transport would result in the proposed development depending on private vehicular access. ▪ Traffic implications of non-core business activities have not been assessed. ▪ There is a lack of assessment of the truck and tradespersons traffic generated during the construction phase. Measures to minimise noise, safety and congestion impacts of this traffic should be identified. 	<ul style="list-style-type: none"> ▪ A revised traffic assessment by TEF Consulting is submitted with the PPR and identifies that the estimated traffic generation from the new development will be a minor addition to the existing traffic volumes and will not affect the operations and capacity of the surrounding traffic network. In addition, the use of AIPM shuttle bus services will be encouraged in the transportation operations of the site. ▪ The site will not be utilised for private functions. ▪ The Construction Environmental Management Plan identifies that a Traffic Management Plan will be prepared in consultation with relevant stakeholders. This Traffic Management Plan will be prepared to ensure a safe working environment; minimise impacts to the local traffic; and ensure no impacts on heritage buildings or environmentally sensitive areas.
	<p>Director- General's Requirements</p> <ul style="list-style-type: none"> ▪ The submission does not adequately address the DG's requirements. ▪ The strategic justification for the project. ▪ Alternatives to the use of the site are poorly addressed by the EA. ▪ The proposal is non compliant with certain provisions of most of all of the applicable planning documents. 	<ul style="list-style-type: none"> ▪ The AIPM facility is an important national resource for all Australasian policing services that has been in existence on the site for 50 years. The site offers a secure location close to the Sydney CBD and provides a unique opportunity and environment for training purposes for senior police from across Australia by professional experts worldwide. The site significantly contributes to the international reputation of the AIPM and its inherent innovation and excellence in policing in Australia that is reflected in the calibre of the instructors and participants worldwide.

Agency/Submitter	Issues	Proponent Response
	<p>Justification for the proposal</p> <ul style="list-style-type: none"> ▪ Alternatives have not been properly explored. ▪ Unsuitability of the site. ▪ No justification for the cost and environmental impact associated with providing a gas pipeline to serve the site as opposed to a gas storage tank. 	<ul style="list-style-type: none"> ▪ Redevelopment of the site will ensure that AIPM facilities continue to build on its reputation and capacity to provide a world class police training facility and thereby contribute to a higher standard of national security. ▪ It is understood that the DGR's do not require an investigation as to the alternative uses of the site, but consideration to alternative sites for the proposed development which is discussed in the EA. ▪ The preferred project scheme is assessed to meet the objectives and provisions of relevant planning instruments and policies as discussed in Section 5. <ul style="list-style-type: none"> ▪ The AIPM has considered alternative sites such as the AFP Majura site in Canberra during the PWC process in 2006, and more recently the Artillery School, and for its permanent location. ▪ The Majura site was deemed unsuitable due to the loss of the central national and international transport hub, the loss of important history and heritage relationship with North Head, the capital and ongoing operational costs were significantly more than the present site, and the Majura site is an AFP owned site therefore is not a neutral site and was unlikely to be supported by the jurisdictions. ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust's (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project. ▪ The assessment of the proposal, including the review undertaken by technical consultants demonstrate that the potential impacts of the project can be sustainably managed and that the site is demonstrably suitable to accommodate the proposed development scheme. ▪ The proposal entails the retention of onsite gas storage facilities to service the use.

Agency/Submitter	Issues	Proponent Response
	<p>Inadequacies of the documents</p> <ul style="list-style-type: none"> ▪ Whether the site will be made available for private and public functions. No information provided about the future commercial uses of the site. ▪ APZ provisions. ▪ Error on map on page 10 of the SEE. ▪ The historic themes listed in the Locality and Surrounding Context section do not cover the full range of historic themes relevant to the site. ▪ Executive summary does not describe the proposed development. ▪ Difficult to scale full size plans. ▪ The location of the 22,000L firewater tank is not provided. ▪ The proposal identifies the removal of ‘some small areas of lawn’ and ‘some planted native vegetation’ but these impacts are not defined. ▪ The principles of the Fisheries Management Act 1994 have not been addressed. ▪ A copy of the ‘Freeman Heritage Assessment’ should be attached to the current CMP for completeness and reference. ▪ The heritage management report does not adequately discuss the ‘owner’s requirements’. ▪ An Interpretation Plan should be prepared for the site. ▪ The building footprint varies in size throughout the EA. ▪ From the aerial of the site, it appears that there is a large tree to the north of the existing Senior Common Room which has not been surveyed. As a result, the location of Cottage No. 8 should be re-assessed. 	<ul style="list-style-type: none"> ▪ Functions such as weddings are not related to the AIPM use. ▪ Proposed APZ is assessed to be adequate. ▪ Error on mapping is noted. Mapping intent is to provide a general identification of surrounding land uses within North Head. ▪ Historic themes of the site are covered in detail in the accompanying heritage reports. ▪ The PPR provides a revised description of the proposal and is illustrated by the accompanying submitted architectural plans and landscape plans. ▪ The water storage tank is to be located under the road in orientation space between northern and southern accommodation blocks. ▪ Specific reference to the Fisheries Management Act is not required by the Director General’s Environmental Assessment Requirements . However, the revised Marine Assessment prepared by AHA Ecology has undertaken an assessment of the marine environment and identifies mitigation measures and recommendations which have been incorporated within the Draft SoCs. ▪ A revised HHMP is submitted with the PPR to respond to the matters raised by DEWHA and NSW Heritage Office. ▪ An interpretation strategy is proposed to inform the heritage significant aspects of the site. ▪ The majority of trees will be retained. 29 trees out of 86 trees will be removed with a proportion that are in poor condition, structurally unsound and younger. Refer to the Arborist Development Assessment Report by Moore Trees in Appendix K.
	<p>Limited consultation</p> <ul style="list-style-type: none"> ▪ The lack of proper consultation under both Federal and NSW environmental planning and assessment legislation. ▪ No explanation is provided as to why consultation with the Commonwealth Department of Environment and Water Resources remains outstanding. 	<ul style="list-style-type: none"> ▪ Public consultation was undertaken in accordance with the statutory requirements and included additional meetings and site inspections. ▪ Consultation has occurred with DEWHA during the redesign of the preferred project scheme.

Agency/Submitter	Issues	Proponent Response
<p>Roads and Traffic Authority</p>	<ul style="list-style-type: none"> ▪ Compliance with Australian Standards for the car parking layout, loading bays, sight distance requirements, aisle widths, ramp grades, turning paths, driveway widths, parking and loading bays. ▪ Off-street parking to be provided to Council's satisfaction. RTA concurs with use of alternative travel arrangements eg mini buses. ▪ Vehicles must be able to enter and exit the site in a forward direction. ▪ Demolition and construction vehicles to be accommodated on site. ▪ Consider bicycle parking on site. ▪ Any associated works, regulatory signposting and lane marking to be at no cost to RTA. 	<ul style="list-style-type: none"> ▪ TEF Consulting identifies that parking and loading design complies with Australian Standards. ▪ The extent of off-street parking is based upon surveys relative to the existing use of the site, which will be satisfactorily provided in conjunction with encouraging alternative travel arrangements. ▪ Vehicles will enter and exit the site in a forward direction, whilst demolition and construction vehicles will be accommodated on site. ▪ Bicycle parking may be considered as part of further design considerations. ▪ Cost considerations relating to associated works, regulatory signposting and lane marking are noted.
<p>North Head Sanctuary Foundation Inc</p>	<p>Impacts on national heritage values:</p> <ul style="list-style-type: none"> ▪ The links between the Seamen's Isolation Hospital site and the Quarantine Station (in both physical and contextual terms) are not adequately being taken into consideration in the proposal. ▪ The density of the buildings on the AIPM site should be reduced rather than expanded due to the adverse impact on the interpretation of the Collins Beach area. ▪ No new buildings which would be visible from Collins Beach, the foreshore areas of Spring Cove, or from other areas of the Harbour, should be constructed. ▪ The site's most culturally significant fabric should be retained, being the early buildings B17, B19 and B22 as well as parts of the early roads. <p>Indigenous significance of the site:</p> <ul style="list-style-type: none"> ▪ Full account needs to be taken of the spiritual and cultural significance of the area as a whole. e.g. including significance of Collins Beach as a meeting point. <p>Impacts on the environment:</p> <ul style="list-style-type: none"> ▪ Bandicoot and penguin populations will be vulnerable to increased pressures of human activity. 	<ul style="list-style-type: none"> ▪ Interpretation of Quarantine Station road is proposed. ▪ Minor increase in FSR on the site. ▪ Setback of new buildings further from the harbour. ▪ All key heritage buildings to be retained in revised scheme. <p>▪ The Indigenous significance of site is discussed in McHardle Heritage Report is Appendix I. Development is limited to existing developed areas of site. No contribution or feedback received by Indigenous community in terms of the consultation process.</p> <ul style="list-style-type: none"> ▪ Revised CEMP and OEMP prepared as part of a Preferred Project Report. ▪ Considerations to amendment of siting of buildings to protect fauna have been undertaken.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ The breeding success of the Little Penguins known to nest and roost during their moult, along the foreshore cliff line immediately below the proposed development, will be impacted upon by the affects of the development on the biophysical environment of both the site and the adjoining coastal slope. ▪ The change in use from solely senior police and other personnel in intensive training courses, to use by other commercial users of conference facilities, will adversely impact upon the population of long nosed bandicoots known to forage in the immediate area of the proposed development. ▪ Changes to watercourses and freshwater flows across the site, with potential associated increases in runoff and saltation of Spring Cove, will have significant adverse impacts on seagrass beds in that area. <p>Other:</p> <ul style="list-style-type: none"> ▪ Integrated management is needed for North Head. ▪ The AIPM should consider relocating, possibly to the former School of Artillery. 	<ul style="list-style-type: none"> ▪ There is no proposal to use the site for activities not associated with the AIPM use. ▪ The Ecological report identifies that marine environments are unlikely to be affected. Potential adverse impacts will be mitigated through appropriate stormwater management measures as recommended by C.R Welsby Engineers Pty Ltd and as per the CEMP and OEMP by Gondwana Consulting Pty Ltd. <hr/> <ul style="list-style-type: none"> ▪ The heritage management of the site will be implemented through continued consultation with relevant stakeholder for the implementation of the Conservation Management Plan. ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust's (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project.
<p>Individual Submission No.1 dated 23.1.2008</p>	<ul style="list-style-type: none"> ▪ Under utilisation of the current site. ▪ Staff currently living in army buildings. ▪ Penguin colony. ▪ Creating more housing on site increases local traffic. 	<ul style="list-style-type: none"> ▪ The proposed scheme entails the addition of accommodation facilities and principally involves a rationalisation and improved efficiency of floor space for the operations of the teaching and administrative spaces. ▪ The accommodation is used for temporary visitors taking part of the courses. ▪ Proposed buildings located away from northern boundary and further from cliff line away from penguin colony. ▪ Traffic impacts assessed to be minimal.

Agency/Submitter	Issues	Proponent Response
<p>Individual Submission No.2 dated 23.1.2008</p>	<ul style="list-style-type: none"> ▪ Current buildings are adequate and of cultural significance. ▪ Tax payers money. 	<ul style="list-style-type: none"> ▪ Operational efficiencies in the layout and functionality of existing facilities exist. Many of the facilities are in poor and deteriorating condition. Key heritage elements of the site will be preserved and protected. ▪ This is not a relevant planning consideration.
<p>Individual Submission No.3 dated 30.1.2008</p>	<ul style="list-style-type: none"> ▪ AIPM site is within National Heritage site. Seaman's Isolation Hospital on site. Indigenous significance of the site. ▪ Penguin and Long nosed bandicoot populations. ▪ Seagrass beds at risk from changes to watercourses across site. ▪ Lack of integrated management of North Head. ▪ No consideration of alternative solutions, i.e. use of the former School of Artillery site. 	<ul style="list-style-type: none"> ▪ The project will be undertaken under the guidance of HHMP to preserve the heritage integrity of the site. ▪ Proposed buildings located away from northern boundary and further from cliff line away from penguin colony. ▪ Provision of foraging areas for bandicoots by removing accommodation buildings towards northern building and reinstatement of landscaping. ▪ Marine Assessment prepared by AHA Ecology has undertaken an assessment of the marine environment and identifies mitigation measures and recommendations to mitigate impacts to marine environment. ▪ The heritage management of the site will be implemented through continued consultation with the relevant stakeholders for the implementation of the HHMP. ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust's (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project.
<p>Individual Submission No.4 dated 1.2.2008</p>	<ul style="list-style-type: none"> ▪ Excavation will affect penguins. ▪ More appropriate alternative site at army barracks on North Head. ▪ Bush fire risk. 	<ul style="list-style-type: none"> ▪ Management of construction and programming will be undertaken in consideration to penguin breeding periods as per the Construction Environmental Management Plan. ▪ The AIPM has considered alternative sites such as the AFP Majura site in Canberra during the PWC process in 2006, and more recently the Artillery School, and for its permanent location.

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Agency/Submitter	Issues	Proponent Response
		<ul style="list-style-type: none"> ▪ The Majura site was deemed unsuitable due to the loss of the central national and international transport hub, the loss of important history and heritage relationship with North Head, the capital and ongoing operational costs were significantly more than the present site, and the Majura site is an AFP owned site therefore is not a neutral site and was unlikely to be supported by the jurisdictions. ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust's (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project. ▪ Bushfire assessment identifies that the site is able to accommodate the proposal subject to implementation of recommendations.
<p>Individual Submission No.5 dated 8.2.2008</p>	<ul style="list-style-type: none"> ▪ Noise from construction period and events. ▪ Light. 	<ul style="list-style-type: none"> ▪ Impacts relating to construction noise and lighting will be mitigated through appropriate measures provided in the Construction Environmental Management Plan.
<p>Individual Submission No6 dated 8.2.2008</p>	<ul style="list-style-type: none"> ▪ Bushfire risk. ▪ Removal of trees and habitat destruction. ▪ Stormwater Management Plan doesn't cater for Aquatic Reserve. ▪ Photomontages are deceptive. ▪ Buildings of heritage significance will be lost. ▪ Loss of indigenous site. ▪ Three day entertainment licence will attract too many people for long periods of time. ▪ No bus services proposed just 48 car parking spaces. ▪ Waste taxpayers money. ▪ Land Exchange Agreement 1979 being abused. ▪ Rural Uni promoting site as Manly Campus. 	<ul style="list-style-type: none"> ▪ Bushfire assessment identifies that the site is able to accommodate the proposal subject to implementation of recommendations. ▪ The majority of trees will be retained. Trees to be removed with include a proportion that is in poor condition, structurally unsound and younger. Refer to the Arborist Development Assessment Report by Moore Trees in Appendix K. ▪ Existing stormwater system features no pollutant control measures. Stormwater management strategy includes pollutant control measures to improve quality of stormwater entering the harbour. ▪ Revised photomontages representative of the Preferred Project Scheme submitted and have been prepared at key vantage points. ▪ Preferred Project Scheme entails retention of all key heritage elements of the site. Development will be guided by the HHMP. ▪ No Potential Archaeological Deposit sites were identified.

Agency/Submitter	Issues	Proponent Response
		<ul style="list-style-type: none"> ▪ No entertainment licences are sought for the site. ▪ Shuttle bus services will be encouraged to transport visitors to and from the site. ▪ The project will ultimately contribute to maintaining national security. ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments. ▪ The site will continue to function as a teaching facility for the AIPM. <p>Charles Sturt University has established the Australian Graduate School of Policing Management (now the AGSP) within the Australian Institute of Police Management which allows both parties to collaborate in supporting teaching, research and professional development for senior police and related organisations.</p>
<p>Individual Submission No.7 dated 11.2.2008</p>	<ul style="list-style-type: none"> ▪ Waste of taxpayers money. ▪ Need for facility in this location. Anti-terrorism. 	<ul style="list-style-type: none"> ▪ This is not a relevant planning consideration.
<p>Individual Submissions No.8 and No.9 dated 12.2.2008</p>	<p>Waste of taxpayers money. Inadequate consideration of alternative sites, i.e. School of Artillery. Not just police using facility and no controls in place to monitor activity/functions. Heritage significance not explored. Senior Common Room proposed location conflicts with penguins nesting area. Bandicoot habitat is affected throughout the site. Established tree removal for car parking. Bushfire risk.</p>	<ul style="list-style-type: none"> ▪ This is not a relevant planning consideration. ▪ The AIPM has considered alternative sites such as the AFP Majura site in Canberra during the PWC process in 2006, and more recently the Artillery School, and for its permanent location. ▪ The Majura site was deemed unsuitable due to the loss of the central national and international transport hub, the loss of important history and heritage relationship with North Head, the capital and ongoing operational costs were significantly more than the present site, and the Majura site is an AFP owned site therefore is not a neutral site and was unlikely to be supported by the jurisdictions.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
		<ul style="list-style-type: none"> ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust's (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project. ▪ The site will not be utilised for private functions. ▪ Extensive heritage assessment has been undertaken. Development will be guided by an approved Conservation Management Plan. ▪ Proposed buildings located away from northern boundary and further from cliff line away from penguin colony. ▪ Provision of foraging areas for bandicoots by removing accommodation buildings towards northern building and reinstatement of landscaping. ▪ Car park areas will require removal of 2 trees ▪ Bushfire assessment identifies that the site is able to accommodate the proposal subject to implementation of recommendations.
<p>Individual Submissions No.10 dated 13.2.2008</p>	<ul style="list-style-type: none"> ▪ Overdevelopment of site, footprint, paved areas and car parking spaces. ▪ Increased traffic on Darley Road. ▪ Encroachment of new buildings affecting penguin habitat. 	<ul style="list-style-type: none"> ▪ Refer to Section 4.1 and 6.3.9. ▪ Traffic impacts are assessed to be minimal. ▪ Proposed buildings located away from northern boundary and further from cliff line away from penguin colony.
<p>Individual Submissions No.11 dated 14.2.2008</p>	<ul style="list-style-type: none"> ▪ Redeveloping the site will spoil the appearance of the whole area. Photo montage show bright materials, therefore creating a negative impact visually, especially at the Little Manly Point end of the site. ▪ Penguins will be affected by the construction noise and light. ▪ Lighting and noise from the Senior Common Room at night will be intrusive. ▪ Expansion of the AIPM facility is not justified. ▪ Non compliance with Manly LEP 1988 5.5, NSW Coastal Policy 5.6 and Coastal Design Guidelines for NSW 5.7. 	<ul style="list-style-type: none"> ▪ Development is designed to minimise visual impacts to North Head by adopting appropriate building heights, external finishes and siting. ▪ Proposed buildings located away from northern boundary and further from cliff line away and the penguin colony. ▪ Management of construction and timeframes will be undertaken relative to penguin breeding periods as per the Construction Environmental Management Plan. ▪ Senior Common room to be located within the existing Axial Hospital Group building. Operational Environmental Management Plan provides mitigating measures for the operations of the site to minimise disturbance to fauna and residents.

Agency/Submitter	Issues	Proponent Response
		<ul style="list-style-type: none"> ▪ The AFP has comprehensively explored alternative sites for the long term operations of the AIPM. The Preferred Project scheme was based upon detailed review of the issues raised by concerned residents and government agencies. The revised scheme is assessed to meet the objectives and provisions of relevant planning instruments and policies.
<p>Individual Submission No.12 dated 18.2.2008</p>	<ul style="list-style-type: none"> ▪ Increase in number of people and buildings on the site. ▪ Penguins will be disturbed by Senior Common Room closer to their nests. Proposed residential shouldn't encroach any closer to bandicoots areas. Proposed buildings shouldn't affect fauna in general by expanding. ▪ Kookaburra Cottage is proposed to be related to Senior Common Room activities, therefore losing its significance as staff housing. ▪ Residential accommodation should be consolidated into one building, in order to minimise footprint. ▪ The use of prescribed burning for fire management is of concern, the preferences is for an enhanced hydrant provision on site. 	<ul style="list-style-type: none"> ▪ Foraging areas for bandicoots at northern portion of site will be increased by removal of dormitory buildings and reinstatement of landscaping. ▪ Kookaburra Cottage is to continue to be used for accommodation purposes. ▪ New residential accommodation has been consolidated into two separate buildings to minimise building footprint. ▪ APZ management will be undertaken as per current arrangements. Additional bushfire management measures are proposed by the bushfire consultants in consultation with the NSW Rural Fire Service.
<p>Individual Submissions No13 dated 15.2.2008</p>	<ul style="list-style-type: none"> ▪ Inaccurate pictorial representations of the proposed redevelopment. Overdevelopment. ▪ Lack of consultation. ▪ Inappropriate use of the facilities, i.e. non police. ▪ Proposal is in conflict with Planning for Bushfire Protection Guide, there should be a Bushfire Safety Engineering Brief. ▪ Extent of the loss of vegetation is unclear. ▪ Strategic Fire Protection Zone. ▪ Impact of foreshore noise barrier and 35m firewall on penguins and bandicoots. Construction timetable impacting on penguin breeding season. Risk to flora and fauna through importation of soil. ▪ Marine environment impacts and no details on how impacts will be mitigated. ▪ Loss of all heritage buildings except two. ▪ School of Artillery alternative is not being considered. The combination of providing 49 parking spaces and allowing buses to come in and out of site area of concern. 	<ul style="list-style-type: none"> ▪ Photomontages of the Preferred Project Scheme as viewed from key vantage points have been prepared by a professional photomontage consultant. ▪ Public consultation was undertaken in accordance with the statutory requirements, including at the Commonwealth level as part of the Commonwealth process. ▪ The site will not be utilised for private functions. ▪ Bushfire assessment includes performance criteria / acceptable solution compliance assessment. Recommendations proposed by bushfire consultant based on assessment. ▪ The majority of trees will be retained. Trees to be removed include a proportion that is in poor condition, structurally unsound and younger. Refer to the Arborist Development Assessment Report by Moore Trees in Appendix K. ▪ Bushfire management includes existing APZ established on the SHNP land as agreed with DECC.

Agency/Submitter	Issues	Proponent Response
		<ul style="list-style-type: none"> ▪ Existing stormwater system features no pollutant control measures. Stormwater management strategy includes pollutant control measures to improve quality of stormwater entering the harbour. ▪ Construction Environmental Management Plan includes water quality mitigation measures. ▪ Preferred Project Scheme entails retention of key heritage buildings of the site. ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust's (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project.
<p>Individual Submissions No14 dated 19.2.2008</p>	<ul style="list-style-type: none"> ▪ Loss of critical habitat for penguins and bandicoots, disturbance of outdoor deck. ▪ Loss of mature trees. ▪ Cultural significance. ▪ Pollution from buildings and car park affecting the Aquatic Reserve in Spring Cove. ▪ Three day special event in unacceptable. 	<ul style="list-style-type: none"> ▪ Proposed buildings located away from northern boundary and further from cliff line away from penguin colony. ▪ Provision of foraging areas for bandicoots by removing accommodation buildings towards northern building and reinstatement of landscaping. ▪ The majority of trees will be retained. Trees to be removed include a proportion that is in poor condition, structurally unsound and younger. Refer to the Arborist Development Assessment Report by Moore Trees in Appendix K. ▪ Preferred Project Scheme entails retention of key heritage buildings of the site and future development to be carried out in accordance with a Heritage Conservation Management Plan to preserve cultural heritage. ▪ Existing stormwater system features no pollutant control measures. Stormwater management strategy includes pollutant control measures to improve quality of stormwater entering the harbour. ▪ The Project Application does not propose any special events.
<p>Individual Submissions no15 dated 20.2.2008</p>	<ul style="list-style-type: none"> ▪ Scale of redevelopment. ▪ Penguins. ▪ Bushfire risk. 	<ul style="list-style-type: none"> ▪ Refer to Section 4.1 of 6.3.9. ▪ Proposed buildings located away from northern boundary and further from cliff line away from penguin colony.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Loss of habitat. Tree felling. ▪ Site justification. 	<ul style="list-style-type: none"> ▪ Provision of foraging areas for bandicoots by removing accommodation buildings towards northern building and reinstatement of landscaping. ▪ The proposal will be carried out in accordance with the recommendation of the revised Bushfire Threat Assessment Report. ▪ The majority of trees will be retained. Trees to be removed include a proportion that is in poor condition, structurally unsound and younger. Refer to the Arborist Development Assessment Report by Moore Trees in Appendix K. ▪ The AIPM facility is an important national resource for all Australasian policing services. The site offers a secure location close to the Sydney CBD and provides a unique opportunity and environment for training purposes for senior police from across Australia by professional experts worldwide. The site significantly contributes to the international reputation of the AIPM and its inherent innovation and excellence in policing in Australia that is reflected in the calibre of the instructors and participants worldwide. ▪ Redevelopment of the site will ensure that AIPM facilities continue to build on its reputation and capacity to provide a world class police training facility.

PWC Submissions Summary

Agency/Submitter	Issues	Proponent Response
Individual submission	<ul style="list-style-type: none"> ▪ Supports the need for improved facilities for police management training but does not support overdevelopment of the site. ▪ Exceeds existing building footprint. ▪ Impacts on Little Penguin, Long Nosed Bandicoot and Red Crown Toadlet. ▪ One of the proposed buildings overlooks one of the main nesting habitats of Little Penguin Colony. ▪ Redevelopment is inconsistent with Government plans and management for an ecological sanctuary at North Head – issues with traffic, noise and habitat disturbance. ▪ AFP reasons for not relocating to another site are not supported. 	<ul style="list-style-type: none"> ▪ Refer to Section 4.1 of 6.3.9. ▪ Changes to the siting of the development is centred upon addressing impacts to fauna. The ecological management of the site will be implemented through a CEMP and OEMP. ▪ Development scheme is redesigned to locate all new buildings south of Jetty Road, away from the Little Penguin Colony, therefore issues relating to overlooking, noise, traffic and habitat disturbance has been addressed. Traffic impacts are assessed to be minimal. ▪ The AIPM has considered alternative sites such as the AFP Majura site in Canberra during the PWC process in 2006, and more recently the Artillery School, and for its permanent location. ▪ The Majura site was deemed unsuitable due to the loss of the central national and international transport hub, the loss of important history and heritage relationship with North Head, the capital and ongoing operational costs were significantly more than the present site, and the Majura site is an AFP owned site therefore is not a neutral site and was unlikely to be supported by the jurisdictions. ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust’s (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project.
Sydney Harbour and Foreshores Committee	<ul style="list-style-type: none"> ▪ Excessive intensification of the site – increase of people by up to 75% and building in excess of some 150%. ▪ Impact to the heritage character of the site by providing 2 – 3 storey buildings and disruption to relationship with Quarantine Station. ▪ Impact on wildlife in particular the bandicoots due to reduction of foraging areas and increased vehicle and personal activity. 	<ul style="list-style-type: none"> ▪ Impacts to enhanced usage of the site will be managed through the OEMP. ▪ Refer to Section 4.1 of 6.3.9. ▪ Maximum height is 2 storeys in accordance with the submitted HHMP. The scheme will entail the removal of two structures in front of the Axial Hospital Group building which will enable unencumbered views of this heritage building from the harbour. ▪ The HHMP includes a recommendation that the presence of the former Quarantine Road and its significance should be supplemented with interpretive material.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
Individual submission	<ul style="list-style-type: none"> ▪ Impacts to a sensitive and heritage value area, the site and the National Park. ▪ Improper use of the land and necessity of the expanded facilities including increased accommodation. ▪ Traffic, excessive car parking, visual impact, building height and loss of heritage buildings. ▪ Redevelopment is based on commercial motives including for non police organisations such as Charles Sturt University. Expansion is unnecessary from an operational point of view. ▪ Uncertainty on the nature of the land tenure / ownership / lease arrangements. Land should be handed back to the NSW State Government. ▪ Concerns with magnitude and nature of the proposed expansion; governmental processes for determining the proposal; and the inadequacy of public consultation. ▪ Concerns with the lack of assessment process. ▪ Unsatisfactory fire protection measures, with fire protection zones appearing to be outside the AIPM site. 	<ul style="list-style-type: none"> ▪ Development scheme is redesigned to locate all new buildings south of Jetty Road, away from the Little Penguin Colony. Traffic impacts are assessed to be minimal. ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained. ▪ Development proposal relates to a use that has been operating on the site for a number of years. ▪ Traffic impacts are assessed to be minimal and car parking provision is designed to accommodate anticipated demands whilst encouraging the use of alternative forms of transport such as the AIPM shuttle bus. The removal of existing buildings in front of the Axial Hospital Group building will enable unencumbered views of the heritage building from the harbour. The maximum building height for the site is two storeys and plans have been amended to retain all heritage buildings. ▪ Charles Sturt University has established the Australian Graduate School of Policing Management (now the AGSP) within the Australian Institute of Police Management which allows both parties to collaborate in supporting teaching, research and professional development for senior police and related organisations. ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments. ▪ Public consultation and governmental processes were undertaken in accordance with the statutory requirements and included additional meetings and site inspections. ▪ The proposal will be carried out in accordance with the recommendations of the revised Bushfire Threat Assessment Report.
Individual submission	<ul style="list-style-type: none"> ▪ The heritage significance of the site being located on North Head, which is heritage listed. ▪ Visual impact from the harbour. 	<ul style="list-style-type: none"> ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained.

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ A quasi function centre is proposed and potential noise impacts. ▪ Land Exchange Agreement 1979 – Clarification of ongoing Commonwealth occupation of the NSW Crown Land. ▪ Identification of the need for the development. ▪ Impacts on Little Penguin and Long Nosed Bandicoot from siting of buildings, potential noise and lighting, construction activities, loss of foraging area and increased hard paved surfaces. ▪ Excessive floor space and incompatibility with historic buildings. Project should be adaptive re-use of buildings, not demolition and building of new buildings. ▪ Impacts to the adjacent aquatic reserve. ▪ Fire protection measures require clearing of bushland both outside and within the AIPM site. ▪ No plans to restore a natural creek for habitat of the Red Crown Toadlet. ▪ Traffic impacts. ▪ No details of infrastructure provision relating to mains power and internet. Concerns of mobile phone tower provision. ▪ Potential increase in waste management and sewer main capacity. ▪ Past occupants of the site has a more significant connection with the site other than police use. ▪ Lack of community consultation. 	<ul style="list-style-type: none"> ▪ The removal of existing buildings in front of the Axial Hospital Group building will enable unencumbered views of the heritage building from the harbour. The maximum building height for the site is two storeys. ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road. ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments. ▪ CEMP and OEMP identify measures during the construction period and on going operation of the facility for the protection of endangered fauna. ▪ Refer to Section 4.1 of 6.3.9. ▪ Proposed stormwater control measures entail pollutant control measures to protect marine environment and the establishment of a natural creek that will act as a natural filtration body to minimise impacts to the aquatic conditions of Spring Cove and provide further habitat for the Red Crown Toadlet. ▪ The proposal will be carried out in accordance with the recommendations of the revised Bushfire Threat Assessment Report. ▪ Traffic impacts are assessed to be minimal. ▪ Development proposal relates to a use that has been operating on the site for a number of years. ▪ Public consultation was undertaken in accordance with the statutory requirements and included additional meetings and site inspections.
Individual submission	<ul style="list-style-type: none"> ▪ Impacts on Little Penguin and Long Nosed Bandicoot. 	<ul style="list-style-type: none"> ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road to address impacts to fauna.
Individual submission	<ul style="list-style-type: none"> ▪ Amenity and visual impacts to Spring Cove by extension of activities and buildings. 	<ul style="list-style-type: none"> ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road, further from the harbour. The removal of existing buildings in front of the Axial Hospital Group building will enable unencumbered views of the heritage building from the harbour.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
<p>North Head Sanctuary Foundation Inc</p>	<ul style="list-style-type: none"> ▪ Excessive scale and development. Development should be limited to retention and retro fitting existing building. ▪ Purposes for redevelopment unclear, concerns with commercial letting and inadequate justification to extent of accommodation proposed. ▪ Land Exchange Agreement 1979 details unknown. ▪ Increased activity to North Head, National Heritage listed place and impacts to national heritage values. ▪ North Head requires integrated management across the whole of North Head in accordance with provisions of EPBC Regulations. ▪ Cumulative heritage impacts of other proposals in North Head. ▪ Potential amenity issues to residents of the Eastern Hill area of Manly. ▪ Sustainability initiatives should extend beyond rainwater harvesting and compliance with government policies. ▪ Bushfire protection measures should not entail further clearing of vegetation on National Park land. ▪ Construction works be briefed on flora, fauna and heritage fabric of the site with heritage experts to be present on site. ▪ Traffic impacts to the locality. ▪ Impacts on Little Penguin and Long Nosed Bandicoot from siting of buildings and potential noise and lighting, loss of foraging area and increased hard paved surfaces. ▪ Ensure any changes to water flows do not impact on Red Crown Toadlet. ▪ Demonstrate due diligence in protecting the Indigenous values of the area. 	<ul style="list-style-type: none"> ▪ Refer to Section 4.1 and 6.3.9. ▪ Development entails retention of all key heritage buildings and adaptive reuse. ▪ Redevelopment of the site to cater for enhanced demands for training and management courses for AIPM purposes. ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments. ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained. ▪ The heritage management of the site will be implemented through continued consultation with the relevant stakeholders in accordance with the recommendations of the HHMP. ▪ The site is situated away from immediate residential properties and operations of the use will be required to be in accordance with the OEMP. ▪ ESD principles adopted in building design and infrastructure. ▪ The proposal will be carried out in accordance with the recommendations of the revised Bushfire Threat Assessment Report. ▪ CEMP identifies procedures for construction relating to the fauna and heritage matters. ▪ Traffic impacts are assessed to be minimal. ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road to address fauna impacts. ▪ The development of a natural creek is proposed that will provide for the Red Crown Toadlet habitat. ▪ The Draft HHMP includes a recommendation that access to be available for indigenous people to maintain cultural traditions and revised Indigenous Archaeological Assessment undertaken. Indigenous stakeholders invited to comment on proposal.

Agency/Submitter	Issues	Proponent Response
Individual submission	<ul style="list-style-type: none"> ▪ North Head requires integrated management across the whole of North Head. Whether the proposal is compatible with the North Head Sanctuary, and impacts to national heritage significance of North Head. ▪ Intensification of the site, increased bulk and scale, visual impacts. ▪ Environmental impacts and management issues relating to noise, traffic, waste, sewerage, fauna and flora. ▪ Land Exchange Agreement 1979 and concerns with potential commercial operations of the land. ▪ Ineffective community consultation. ▪ Accountability queries for ecological sustainable design and best-practice management principles. 	<ul style="list-style-type: none"> ▪ The heritage management of the site will be implemented through continued consultation with the relevant stakeholders for the implementation of the HHMP. The development is confined to within an existing developed site and is designed in a manner that is appropriate in respect to fauna, heritage significance and other environmental considerations. ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained. ▪ Refer to Section 4.1 and 6.3.9. ▪ The proposal will be carried out in accordance with the recommendations of the revised Bushfire Threat Assessment Report. ▪ CEMP and OEMP will manage environmental impacts. ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments. ▪ Public consultation was undertaken in accordance with the statutory requirements, including at the Commonwealth level as part of the Commonwealth process. ▪ ESD principles adopted in building design and infrastructure.
Individual submission	<ul style="list-style-type: none"> ▪ Impacts to Little Penguin and Long-nosed Bandicoot. ▪ The area has links to Sydney's early history. ▪ The natural bushland environment should be maintained. 	<ul style="list-style-type: none"> ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road to address fauna impacts. ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained. Heritage interpretation recommended in respect to Jetty Road and Quarantine Road. ▪ Majority of trees to be retained on site and additional landscaping proposed.
Individual submission	<ul style="list-style-type: none"> ▪ The proposal is excessive, insensitive and inappropriate for the site. ▪ Question over the legality of the proposal in terms of the 1979 Land Exchange Agreement and the use functions as a residential Conference Centre. 	<ul style="list-style-type: none"> ▪ Refer to Section 4.1 and 6.3.9. ▪ Building heights are limited to 2 storey in accordance with the submitted HHMP and existing maximum heights on site.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Other possible sites for AFP should be explored. ▪ The 2 and 3 storey buildings proposed are not compatible with the scale of the historic buildings on site. ▪ The Senior Common Room is excessive and impacts on the Little Penguin colony. ▪ Concerns over 50% increase in paved surfaces, roads and carpark. 	<ul style="list-style-type: none"> ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments. ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road to address fauna impacts. ▪ Vehicular access areas and car parking are proposed predominantly to the rear areas of site to minimise visibility of paved surfaces from coastal vantage points. Minor extension of parking area within the eastern setback of the Axial Hospital Group building to rationalise parking layout to improve aisle width.
Manly Council	<ul style="list-style-type: none"> ▪ The proposal to add 60% floorspace in the form of 2 and 3 storey buildings will have a negative impact on the heritage values of the space. ▪ The land tenure should be clarified by reference to the 1979 letter referred to in the AIPM Referral and also the 1984 agreement. ▪ The use as a public function and conference centre exceeds the use as a 'Police College'. 55 bedrooms, is approaching that of a commercial conference centre. ▪ Does not acknowledge the significance of the first contact between Europeans and Aboriginal people on Collins Beach. ▪ Incompatible with the scale of the historic buildings on the site. ▪ Marine impacts. ▪ There is no habitat enhancement proposed for the Long-nosed Bandicoot population. Decrease in total area of foraging habitat. ▪ For the proposal to be sustainable it should restore the watercourse with the required buffer zone. ▪ Referral does not adequately describe the large caves which are part of the cliffline and are used by penguins for nesting. ▪ The car parking and hard surfaces will be increased by 50% and visible from harbour vantage points. ▪ Inadequate APZs. 	<ul style="list-style-type: none"> ▪ Refer to Section 4.1 and 6.3.9. ▪ Building heights are limited to 2 storey in accordance with the submitted HHMP and existing maximum heights on site. ▪ The site has been lawfully occupied by the Commonwealth since 1910 and more recently by the Australian Institute of Police Management (AIPM) since 1959, under permissive occupancy with the consent of New South Wales (NSW). The AIPM's occupancy of the site has been governed by a number of Deeds, agreements and understandings between the governments. ▪ Redevelopment of the site is for AIPM operations. ▪ The development is not sited on Collins Beach and layout of new buildings are proposed to be setback further from the harbour and includes removal of two non heritage buildings in front of the Axial hospital group building. ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained. ▪ Additional stormwater quality control measures pollutant control devices and the establishment of a natural creek that will act as a natural filtration body to minimise impacts to the aquatic conditions of Spring Cove. ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road, away from sensitive fauna areas.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
	<ul style="list-style-type: none"> ▪ Collins Beach Road does not accommodate emergency access. ▪ Inadequate consultation process. 	<ul style="list-style-type: none"> ▪ The development of a natural creek is proposed that will provide for the Red Crown Toadlet habitat. ▪ Vehicular access areas and car parking are proposed predominantly to the rear areas of site to minimise visibility of paved surfaces from coastal vantage points. Minor extension of parking area within the eastern setback of the Axial Hospital Group building to rationalise parking layout to improve aisle width. ▪ Bushfire measures will be carried out in accordance with the recommendations of the revised Bushfire Threat Assessment Report. ▪ Collins Beach Road already functions for emergency access. ▪ Public consultation was undertaken in accordance with the statutory requirements, including at the Commonwealth level as part of the Commonwealth process.
Individual submission	<ul style="list-style-type: none"> ▪ 60% increase in floorspace and overdevelopment. ▪ Impacts of the Senior Common Room upon Little Penguins. ▪ Impacts to marine environment. ▪ Impacts to bandicoots and penguins. ▪ Impacts of providing APZ onto Little penguin and bandicoot. ▪ Traffic impacts. ▪ Waste management and sewage impacts. ▪ Alternative venues for police education should be explored. 	<ul style="list-style-type: none"> ▪ Refer to Section 4.1 and 6.3.9. ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road, away from sensitive fauna areas. ▪ Additional stormwater quality control measures include pollutant control measure and the establishment of a natural creek that will act as a natural filtration body to minimise impacts to the aquatic conditions of Spring Cove. ▪ CEMP and OEMP to identify construction and operational management requirements to address impacts on fauna and other environmental issues. ▪ Bushfire management of the site is currently provided by APZs on the adjacent National Park land and will continue to be maintained as agreed between NPWS and the AIPM. ▪ A revised traffic assessment by TEF Consulting is submitted with the PPR and identifies that the estimated traffic generation from the new development will be a minor addition to the existing traffic volumes and will not affect the operations and capacity of the surrounding traffic network. In addition, the use of AIPM shuttle bus services will be encouraged in the transportation operations of the site. ▪ The AIPM has considered alternative sites such as the AFP Majura site in Canberra during the PWC process in 2006, and more recently the Artillery School, and for its permanent location.

RESPONSE AND ACTIONS TO KEY ISSUES

Agency/Submitter	Issues	Proponent Response
		<ul style="list-style-type: none"> ▪ The Majura site was deemed unsuitable due to the loss of the central national and international transport hub, the loss of important history and heritage relationship with North Head, the capital and ongoing operational costs were significantly more than the present site, and the Majura site is an AFP owned site therefore is not a neutral site and was unlikely to be supported by the jurisdictions. ▪ The Artillery School is unsuitable to house the AIPM permanently due to the sheer mass of the site and fractured relationship between buildings, lack of security of the site, the future aspirations of the site under the Sydney Harbour Federation Trust's (SHFT) stewardship including multi-tenancy and public access, ongoing costs associated with operational maintenance and rent, and the time and cost impacts of delivering such a project.
Individual submission	<ul style="list-style-type: none"> ▪ Impacts to Little Penguin and Bandicoots and flora. ▪ Visual characteristics of the area will be altered and destroyed. ▪ Noise impacts. 	<ul style="list-style-type: none"> ▪ Development scheme has been redesigned to locate all new buildings south of Jetty Road, away from sensitive fauna areas. ▪ Majority of trees to be retained and additional landscaping proposed. ▪ Site is to be used for AIPM operations and not as entertainment venue. ▪ CEMP and OEMP to identify construction and operational management requirements to address impacts on fauna and other environmental issues. ▪ The removal of existing buildings in front of the Axial Hospital Group building will enable unencumbered views of the heritage building from the harbour.
Individual submission	<ul style="list-style-type: none"> ▪ The new buildings proposed go against the intent and purpose of Heritage Listing. The redevelopment is at a variance with the proposed North Head Sanctuary and will detract from the site's heritage values. ▪ Heritage, access and environmental impacts. 	<ul style="list-style-type: none"> ▪ HHMP will guide the adaptation, restoration and conservation of heritage items to ensure the integrity of heritage significance is retained. ▪ Environmental issues have been a key focus in both design and operations of the site, this includes the implementation of a CEMP and an OEMP. ▪ The redesign of the facility to locate buildings south of Jetty Road to be set further back from the harbour and environmentally sensitive areas is to address issues relating heritage and ecological considerations.

Agency/Submitter	Issues	Proponent Response
Individual submission	<ul style="list-style-type: none"> ▪ Significance of Collins Flat (Spring Cove) in terms of spearing of Captain Philip. ▪ Existing buildings on site should remain intact. ▪ Impacts to penguin colony from waste, increased paved floor area and carparks and increased traffic. ▪ Inadequate sewage capacity for the whole North Head area. ▪ The need for a residential conference centre on the site when less sensitive areas are available. 	<ul style="list-style-type: none"> ▪ The development is not sited on Collins Beach and layout of new buildings is proposed to be setback further from the harbour. ▪ All key heritage buildings are to be retained. ▪ Waste management will be managed in accordance with an OEMP. ▪ Stormwater management will include pollutant control measures to mitigate impacts to the marine environment. ▪ A revised traffic assessment by TEF Consulting is submitted with the PPR and identifies that the estimated traffic generation from the new development will be a minor addition to the existing traffic volumes and will not affect the operations and capacity of the surrounding traffic network. ▪ Sewerage infrastructure will be provided in accordance with Sydney Water requirements. ▪ Redevelopment of the site is for the purposes of AIPM operations.

7 Revised Statements of Commitments

A revised Draft Statement of Commitments is included at **Appendix M** which includes further revisions to reflect the recommendations of the accompanying technical reports. These commitments are expected to be delivered as part of the development of the site and standards that will have to be met to achieve approval.

The draft Statement of Commitments identifies the following:

- General terms that the project will adhere to.
- Measures to mitigate any environmental impacts.
- Measures to monitor the environmental performance of the project.
- Achieving minimal impact on the environment and a positive environmentally sustainable outcome.



8 Conclusion

The Preferred Project Scheme for the AIPM site represents a design scheme that appropriately responds to all relevant government and public submissions received during the assessment process. This is primarily achieved through the following amendments to the Project Application:

- Deletion of the previously proposed pavilion forms north and “in front” of the heritage Axial Hospital Group building.
- Retention of all existing cottage buildings: Spring Cove Cottage, Garden Cottage, Kookaburra Cottage and Harbour Cottage.
- Retention of Jetty Road layout.
- Deletion of the existing dormitory buildings north of the Axial Hospital Group building.
- No proposed development north of Jetty Road, providing new fauna foraging areas and additional setbacks from the cliff line /northern boundary.
- Location of proposed visitor accommodation in the south western portion of the site.

Overall, the Preferred Project Scheme aims to address the key ecological and heritage considerations by providing suitable setbacks from fauna species and enhanced foraging areas; and the additional retention of heritage significant buildings. In summary, the modified project application will:

- Provide enhanced foraging areas to the north of the site for the Long-nose bandicoot.
- Provide appropriate setbacks from the northern boundary and the cliff line to achieve further separation distances from the Little Penguin colony.
- Retain the heritage integrity of the site by removing non heritage buildings in front of the heritage Axial hospital group building and allowing for new appreciation of this heritage building and the foreground when viewed from the harbour. The retention of all heritage former staff cottages and the Spring Cove cottage further contributes to retaining the heritage integrity of site in accordance with the recommendations by all levels of government and the general public.
- Provide for no new development to the north of the Axial Hospital Group building and retention of the Jetty Road layout, which will be appropriately landscaped and embellished for heritage interpretation and improved fauna foraging habitat.
- Meet the objectives of the relevant planning instruments and policies, particularly in respect to the coastal design, amenity, heritage and ecological considerations.
- Achieve a high standard of ESD with particular focus on conservation of fauna; and heritage conservation.
- Maintain the ecological values of the site and the surrounding National parks land. The overall biodiversity values and long-term viability of overall biodiversity values on the site and adjacent to the site would not be compromised or placed at risk. The implementation of the revised CEMP will ensure the protection of the adjoining Sydney Harbour National Park and endangered fauna. The operational aspects of the redevelopment of the AIPM site would not be substantially different to current levels and could be managed successfully in accordance with the revised OEMP.

An updated suite of technical reports have been submitted with this PPR, which provide an assessment of the Preferred Project Scheme. The assessments by specialist consultants demonstrate that potential impacts associated with traffic; heritage, flora and fauna; and other environmental considerations have been considered and are acceptable. A range of recommendations are provided and will be implemented to ensure the environmental and ecological integrity of the site and its surrounds are maintained.

Appendix A Updated architectural drawings by Brewster Hjorth Architects (BHA)

Appendix B Revised landscape drawings and report by Taylor Brammer

Appendix C Photomontages by Haycraft Duloy Pty Ltd

Appendix D Revised Ecological Report
& Marine Assessment
Report by Alison Hunt &
Associates Pty Ltd

Appendix E Revised Construction
Environmental Management
Plan (CEMP) and
Operational Environmental
Management Plan (OEMP)
by Gondwana Consulting
Pty Ltd

Appendix F Revised Heritage Impact
Statement and Historic
Heritage Management Plan
by Noel Bell Ridley Smith &
Partners (NBRS&P)

Appendix G Revised Bushfire Threat Assessment report by Bushfire Protection Planning & Assessment Services

Appendix H Updated Traffic and Parking report by TEF Consulting

Appendix I Updated Indigenous Cultural Assessment Report by McHardle Heritage

Appendix J Updated Stormwater Assessment report by CRW Engineers

Appendix K Arborist Development
Assessment report and
Root Mapping Assessment
report by Moore Trees

Appendix L Archaeological Report by Casey & Lowe Pty Ltd

Appendix M Revised Draft Statement of Commitments

Appendix N Updated Infrastructure, Building Services and Energy Savings Report by Medland Metropolis