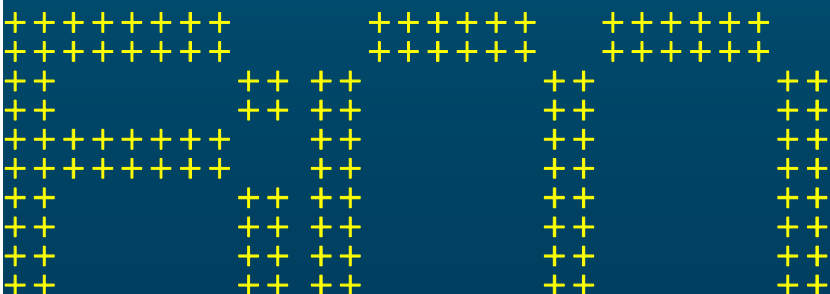
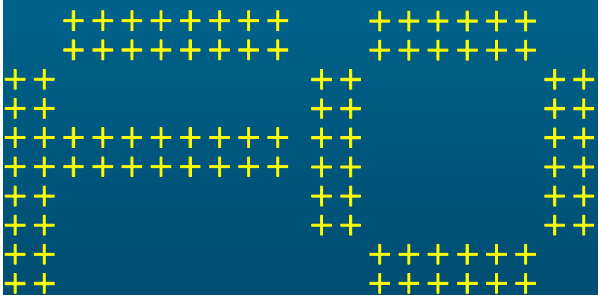
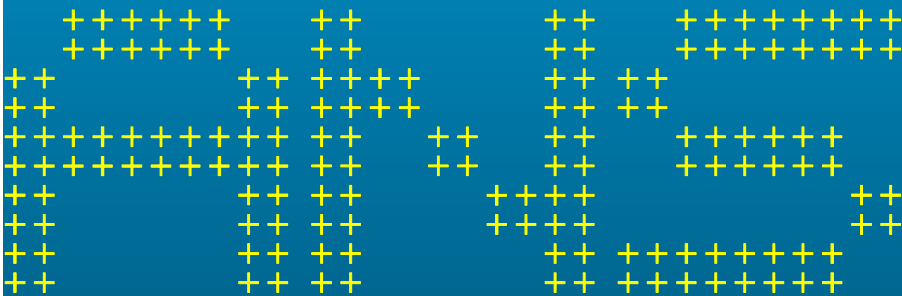
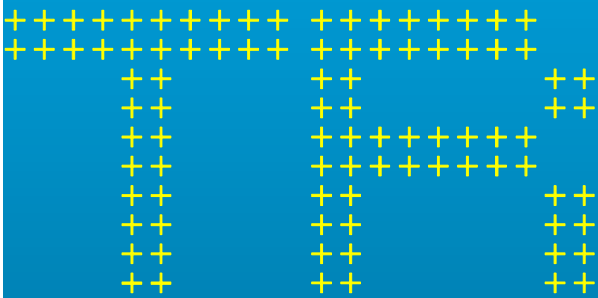


Australian Institute Police Management Site, Manly Environmental Assessment



AIPM (North Head Federal Training Site)

Environmental Assessment

Prepared for Australian Federal
Police

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Statement of Validity

Submission of Environment Assessment:

Prepared under Part 3A of the Environmental Planning and Assessment Act 1979.

Environmental Assessment prepared by:

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In respect of:	AIPM (North Head Federal Training Site) Environmental Assessment	

Certification:

We certify that we have prepared the contents of the Environmental Assessment and to the best of our knowledge the information contained in this report is neither false nor misleading.



Signature

Name: David Hoy

Date 15 October 2007



Signature

Name: Audrey Chee

Date 15 October 2007

Executive Summary

This Environmental Assessment (EA) relates to the redevelopment and upgrading of the Australian Institute of Police Management (AIPM) site, North Head, Manly for the ongoing and long term sustainable use by AIPM.

The aim of the redevelopment is to substantially improve the operational efficiency and long term sustainability of the AIPM and to expand the site's capacity to meet demands for the AIPM training facilities.

The AIPM is administered by the Australian Federal Police and is a highly important federal resource providing services for Australasian and International law enforcement agencies and public safety agencies.

The project represents a development scheme that has already undergone extensive public consultation process to Federal legislative requirements; including an inquiry process by the Parliamentary Standing Committee on Public Works.

The key planning considerations applicable to the Environmental Assessment were determined on the basis of the issues that arise during the previous consultation process together with matters raised under the Director General's Requirements. The assessment of the proposal, including the review undertaken in the accompanying technical information demonstrates that all on-site and off-site impacts have been carefully considered and addressed.

The scheme reflects the following environmental considerations:

- The site's foreshore and natural bushland setting and the overall cultural and historic significance of North Head.
- The presence of European heritage items on the site (no Indigenous Archaeological sites have been identified on the site).
- The ecological attributes of the site, including the habitat of the Little Penguin and foraging areas for the Long-nosed Bandicoot.

This report demonstrates the proposal meets 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.

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

The development provides for the opportunity to ecologically enhance the site. Site works include the improved stormwater management measures that will improve the quality of stormwater runoff into Spring Cove. Landscaping works will include the addition of endemic species of the North Head areas and the locality. In conjunction with raised built forms and boardwalks, opportunities for fauna corridors throughout the site will be established.

Summary Director General Requirements

Director General's Requirement	Provision in EA	Relevant Section of EA
Executive Summary	✓	Page ii
Detailed description of the Project: Strategic justification for the project; Alternatives considered; and Components and stages of the project.	✓	Sections 3, 4 Pages 13 - 17
Consideration of State and Commonwealth Technical and policy guidelines, NSW SEPPs, planning instruments and policies. Justifications required for any proposed variations from the above provisions.	✓	Section 5 Pages 5 - 32
Draft Statement of Commitments	✓	Appendix M
Conclusion justifying the project	✓	Section 11 Pages 54
Signed statement from the author of the Environmental Assessment	✓	Page i
Assessment of key issues identified in the DG requirements	✓	Section 7 Pages 35 - 52
Impact on Threatened Species with regard to draft Guidelines for Threatened Species Assessment, Commonwealth Environment Protection and Biodiversity Conservation Act 1999: Guide to implementation in NSW: March 2007.	✓	Section 7.1, Pages 35 - 36 and Ecological Report (Appendix D)
Heritage with regard to National heritage list and protected under the EPBC Act.	✓	Section 7.2 Pages 36 – 38 and Appendix E
Urban design and built form	✓	Section 7.3 Pages 39 – 40
Visual impact	✓	Section 7.3, Pages 39 - 40 and photomontages (Appendix G)
Traffic	✓	Section 7.4, Page 41 and Traffic Report (Appendix H)
Bushfire	✓	Section 7.5, Pages 41 - 43 and Bushfire Risk Assessment Report (Appendix I)

Utilities infrastructure		Section 7.6, Page 43 and Utilities Report (Appendix J)
Impacts on water quality and drainage		Section 7.7 Pages 43 – 44
<p>Consultation with Agencies and other authorities:</p> <ul style="list-style-type: none"> – Manly Council – Commonwealth Department of Environment and Water Resources – NSW Department of Environment and Climate Change – Heritage Office, Department of Planning – NSW Department of Natural Resources – NSW Department of Primary Industries – Metropolitan Local Aboriginal Land Council – NSW Rural Fire Service – All utility providers <p>Consultation with the Public:</p> <ul style="list-style-type: none"> – Document community consultation undertaken to date and identify issues raised. 	✓	Section 6 Pages 33 – 34

1 Introduction

This Environmental Assessment (EA) accompanies a major project application (MPA) for the redevelopment and upgrading of the Australian Institute of Police Management (AIPM) site for the ongoing and long term sustainable use of the site by AIPM.

The land is known as the AIPM site located at North Head, Manly and is identified as the “*North Head Federal Police Training site*” under Schedule 3 of the Major Projects SEPP. For the purposes of this report, the site is referenced as the AIPM site.

The aim of the redevelopment is to substantially improve the operational efficiency and long term sustainability of the AIPM and to expand the site’s capacity to meet demands for the AIPM training facilities.

This EA provides the following details to assist the Department of Planning (DoP) with an assessment of the MPA, as detailed in the Director-General’s Environmental Assessment Requirements (DGRs):

- Background to the proposal;
- A description of the proposed development and upgrading works;
- A review of the proposal with respect to the general and key assessment requirements including:
 - Relevant statutory planning provisions;
 - Identified key technical issues;
 - Statement of Commitments; and
 - Key issues raised by stakeholders.

1.1 Proponent and Project Team

The proponent of the development is the Australian Federal Police. The preparation of the EA entailed a comprehensive project team and the respective fields of expertise of each project team member.

- Project management: Thinc Projects
- Architectural design: Brewster Hjorth Architects
- Landscape Design: Taylor Brammer
- Urban planning: Urbis
- Ecological consultants: AHA Ecology
- Heritage consultants: Noel Bell, Ridley Smith & Partners; McCardle Cultural Heritage Pty Ltd
- Bushfire risks: Bushfire Protection Planning & Assessment Services
- Hydrology and (storm)water management: J.J. Marino & Associates
- Traffic & transport: TEF Consulting
- ESD and Energy Efficiency: Medland Mitropoulos
- Photomontages: Haycraft Duloy Pty Ltd

Specialist reports and documentation prepared by the project team are contained within the attached Appendices.

2 Background

The AIPM is part of Australia's National Common Police Services, which operate under the governance of the Australian Police Minister's Council and has operated from the site since 1960.

The AIPM is administered by the Australian Federal Police and is a highly important federal resource providing the following services for Australasian and International law enforcement agencies and public safety agencies:

- Senior management and executive development;
- Education; and
- Consultancy services.

Federal legislative requirements has already seen the proposed redevelopment of the AIPM site undergo an extensive public consultation process, including an inquiry process by the Parliamentary Standing Committee on Public Works (the Committee) in March 2006 under the Commonwealth's Public Works Committee Act 1969.

The inquiry process involved public participation through:

- Advertisement of the Inquiry in the Sydney Morning Herald on 22 April 2006;
- Submissions sought from relevant government agencies, and potentially affected / interested private organisations and individuals; and
- An inspection by the Committee and a public hearing on the 2 June 2006.

Arising from the inquiry process, the Committee recommended that the redevelopment of the AIPM site proceed. However, recommendations also included the requirement for AFP to undertake further consultation with Manly Council, other key stakeholders and the local community to resolve community concerns with the redevelopment of the site.

The outcomes associated with the required consultations have resulted in a final redevelopment scheme that is the subject of this Major Project application.

Concurrently with the Part 3A Major Process, the proposal will be considered at the Federal level by the Department of Environment and Water Resources in respect to the Environment Protection and Biodiversity Conservation Act 1999 through a one-off accredited assessment process.

3 Description of the Site and Locality

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.

Figure 1 – 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, which has operated from the site since 1960. Prior to 1960 the site was used as a Seaman's Isolation Hospital.

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 and trophy room.
 - "*Spring Cove Cottage*", a heritage item currently used for short term living accommodation.
- Garden Cottage and the staff accommodation:
 - Comprise of three former staff cottages located to the west of the Axial Hospital Group and are known as the "*Garden Cottage*"; "*Kookaburra Cottage*"; and "*Harbour Cottage*". These buildings have been adapted to accommodate short term living accommodation.
- 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 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 minor 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 does not accommodate breeding habitat areas for the Long-nosed bandicoot.

[illegible]



Picture 1 – The grassed areas of the northern areas of the site, looking south east towards the two storey library (central building in photo)



Picture 2 – The setback and grassed areas of the northern portion of the land, looking west with the adjacent dormitory and heritage item in Spring Cove Cottage, that is being retained



Picture 3 – Single cottage and built form structure, including “Harbour Cottage” in the background of the photo, to be demolished



Picture 4 – Western view of the main Axial Hospital Group Building to be retained



Picture 5 – Eastern view of main Axial Hospital Group building and dormitory adjacent to the eastern boundary of the site

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 North Head 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.

Figure 3 – Surrounding Land Uses



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 and Spring Cove.



Picture 6 – Spring Cove to the North



Picture 7 – Sydney Harbour National Park lands to the south



Picture 8 – South-eastern corner of the site and interface to Sydney Harbour National Park



Picture 9 – Entry / exit point of the site on the eastern boundary

For bushfire protection purposes, NPWS (Department of Environment and Climate Change) currently manages an asset protection zone (APZ) adjacent to the AIPM site. It is understood that this APZ is currently required to be 10m wide adjacent to site's western and southern boundaries under existing bushfire management regime of the National Park.

3.2.3 Transport Infrastructure

The site's isolated position is not within proximity to public transport facilities. The AIPM use 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 and sites.
- The ecological attributes of the site requires sensitive siting of the development; and implementation of construction and operational management procedures 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 Proposed Development

4.1 Overview

The subject MPA seeks approval 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 by way of considerable government and community consultation under Commonwealth legislation.

The development scheme represents an opportunity to upgrade the AIPM facilities with close respect and integration with the site's unique surroundings and location. Importantly, the proposal has been designed with objectives of enhanced environmental conservation benefits.

A fundamental consideration in formation of the scheme is the incorporation of 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.

4.2 The Proposal

AIPM is a provider of law enforcement leadership courses and the AIPM/AFP is committed to operating as provider of law enforcement leadership courses. The AIPM have previously, on the basis of spare capacity and in accordance with Commonwealth policy and guidelines, allowed a number of select conferences to also utilise the site.

While the AFP/AIPM may, from time to time, and in accordance with Commonwealth policy, continue to utilise the site to provide leadership courses to other Commonwealth and State Government Safety and Regulatory agencies, the recent increase in law enforcement numbers and skills requirements has allowed the AIPM to move to utilising the AIPM almost 100% for law enforcement leadership courses. In this regard, it is noted that it is not the intention of the AFP or the Commonwealth to create or support a private sector commercial enterprise on this site.

The AFP proposes to redevelop the AIPM site for the ongoing and long term sustainable use of the site by AIPM. The aim of the redevelopment is to:

- Substantially improve the operational efficiency and long term sustainability of the AIPM;
- To expand the capacity of the AIPM facilities to meet the operational demands;
- To modernise security; and
- To achieve compliance with the relevant codes and standards.

The need for the redevelopment is as follows:

- Existing teaching, recreation, dining and administrative spaces are inadequate to satisfy increasing demand for AIPM programs;
- Residential accommodation is substandard;
- Operational inefficiencies in the layout and functionality of the existing facilities;
- Many of the facilities are in poor and deteriorating condition, and do not meet relevant current codes and standards;
- Operating and maintenance costs are increasing as the facilities age; and
- The identified built heritage elements of the site need to be preserved and protected.

The redevelopment will consist of:

- Replacement of visitor accommodation blocks, administrative and academic office accommodation and senior common room facilities with new facilities in separate pavilion type structures;
- Refurbishment and a western extension of the existing library; and refurbishment of teaching, dining areas and specific heritage buildings, notably Spring Cove Cottage, Garden Cottage and the main building within the Axial Hospital Group;
- Removal of existing barrack style accommodation buildings, an office building in the south eastern portion of the site and miscellaneous stores buildings, including two accommodation buildings and Kookaburra Cottage that front Spring Cove; and Harbour Cottage;
- Landscape works including consolidation of car parking and improvement to overall environmental amenity to the occupants of the facility and native fauna;
- Increase in residential visitor accommodation facilities from 30 beds to 60 beds and a total staff level from 35 to 45 employees (inclusive of training, administrative and maintenance staff); and
- Formal car park areas in least sensitive locations of the site: in the south eastern and south western corners of the site; and a small car park area to the western boundary of the site.

The following statistics provide a comparative summary of key development statistics between the existing development and the proposed scheme.

Statistic	Existing	Proposed Scheme
Site Area	18,396sqm	18,396sqm
Site Cover (Total Building Footprint)	3,379sqm	3,485sqm
Total area of paths, decks and roads	2,213sqm	2,727sqm
Total area of boardwalks and decks (pervious area)	0sqm	980sqm
Gross Floor Space	3,764sqm	4,685sqm
Building Height (Storeys)	1 and 2 storeys	1 and 2 storeys
Landscape area	12,804sqm	11,204sqm (excludes landscaping below boardwalks)
No. of beds	30	60
Car parking spaces	37	43 plus 1 space for bus/service vehicle

Whilst the proposed scheme entails an increase in the extent of accommodation, the development scheme principally involves a rationalisation and improved efficiency of floor space demonstrated by an overall insignificant nett increase to existing built form site cover of some 104sqm or 0.5% of the total site area.

Key development features of the proposed scheme entails:

- A scale and design of buildings that reflect small scale pavilion forms of single to two storey heights to minimise visual impact and improvement to heritage interpretation of the original buildings.
- Appropriate setbacks from the escarpment to the north to maintain foraging and habitat areas for endangered fauna.

- Locating parking areas to the south of the site to minimise visual impacts when viewed from the north.
- Accommodation buildings are raised off the ground and linked by a series of boardwalks to allow movement of bandicoots through the northern section of the site.
- Landscaping to include a series of “green fingers” for fauna movement and enhanced landscaping between buildings. Development of a “natural creek” to the north of the site and opportunity for filtration of stormwater.
- The selection of materials and colours to integrate with heritage items 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 proposed development are shown on the plans prepared by Brewster Hjorth Architects and are relied upon within this MPA submission (**Appendix A**).

4.3 Landscape Works

Landscape works are designed by Taylor Brammer (**Appendix B**) which aims to enhance the landscape setting of the site. Landscaping and environmental management strategies have been developed that respond to the demands of bushfire management and sensitive co-existence with native flora and fauna. It is proposed over time weeds and exotic plants are removed in a controlled manner and replaced with endemic species. The landscape scheme includes “islands” of low planting to be incorporated within grasslands as between the main building group and the harbour cliff edge that will create an environment that is appropriate refuge for the Long nosed Bandicoot and will present an enhanced setting for the site. Landscape principles that informed the landscape design scheme are presented below:

- Preservation of existing landscape features such as the retention of significant trees and enhancement of key areas of the site in respect to flora and fauna preservation; and landscape areas of high value.
- Enhancement of landscape value such as retention of existing watercourse areas and creation of new “natural creek” for natural infiltration measures.
- Establishing “green fingers” of landscape area between buildings and planting of species endemic to the locality.
- Environmental performance by adopting best practice initiatives by contributing to the collection and re-use of stormwater; and adopting recycled water for irrigation.

4.4 Strategic Justification for the Project & Alternatives Considered

A demonstrated need and growing demand for AIPM programs in conjunction with inadequate and deteriorating infrastructure, the AFP was required to consider the following limited development options for the AIPM site:

- To do nothing;
- To relocate AIPM to another site; or
- Redevelop the existing site

The above options were explored and presented at the Federal Parliamentary Standing Committee on Public Works with the following outcomes associated with each option:

Do Nothing Option

The option of continued occupation and use of the site in its current condition is not viable as the facilities are inadequate to satisfy the increasing demand for AIPM programs.

The facilities have been deteriorating and continual use of such facilities will result in further deterioration, continual operational inefficiencies, high maintenance and recurrent costs. There is also the need to address occupational health and safety issues.

Relocation Option

The option would involve ceasing use of the site for police training and therefore the recognition of the historical and cultural significance of the police use with the site would cease. Senior police within jurisdictions regard the site highly in terms of history, standing and stature, and enjoy “ownership” of it as a common facility.

The complexities in finding an alternative location that meets the security criteria requirements also contributes to this least achievable option.

Redevelopment Option

This was concluded to be the most appropriate option which will facilitate the economic use of existing structures and associated refurbishment and upgrading of significant buildings and maintenance of a heritage site. The redevelopment option will provide the opportunity to comprehensively conserve key heritage buildings and the overall site in accordance with a Conservation Management Plan. The AIPM’s continued occupation of the site will continue the historical government associations of the site and with North Head.

The subject design scheme represents an outcome of extensive design revision over several years, through the Commonwealth process. The scheme initially involved the visitor’s accommodation within a series of three elongated blocks in the southwestern corner of the site and the associated removal of the “Garden Cottage”. This scheme included the retention of “Kookaburra Cottage”, located towards the northern boundary of the site.

As a result of the Federal public consultation processes and an inquiry process by the Parliamentary Standing Committee on Public Works (the Committee) in March 2006, the design scheme was revised to respond to the matters arising from these Federal processes. This revised design scheme was the entitled the “*Eco-heritage Master Plan*” as illustrated below, and was subsequently accepted by the Committee as a scheme that “*now reflects a more eco-heritage orientation*” (Refer to **Appendix C**).



Extract from the Eco-heritage Master Plan

The submitted architectural plans with this EA are the final architectural drawings that have been based upon the “*Eco-heritage Master Plan*”. This design scheme of separate pavilion built forms provides for the following improvements in comparison to the original scheme of 3 elongated built forms that were originally proposed before the Commonwealth:

- Reduction in the scale and bulk of the proposed buildings.
- Minimises the visual impact of the proposed buildings with respect to the existing heritage buildings.
- The form of the proposed buildings relate to the form and respond to the nature of the original heritage buildings, the Seaman’s Isolation hospital with the five ward blocks connected by a long verandah.
- It is an environmentally and ecologically sensitive design through the provision of lightweight structures raised off the ground and linked by boardwalks. Minimal disturbance to the existing landscape and enhanced fauna movement through the site will be achieved.
- The effects of minimisation of excavation will benefit local fauna.
- Existing ground water movement can be maintained through the site to the cliff edge and associated vegetation.
- Relocation of the Senior Common Room and external deck benefits the habitat of the Little Penguin by the reorientation of direct noise and light sources.
- Car parking has been located adjacent to the southern boundary in the bushfire asset protection zone where tree planting would be limited. This will also allow the retention of the bandicoot foraging area on the eastern side of the existing buildings adjacent to the sandstone wall.
- The smaller buildings are more suited for localised rainwater collection and solar hot water heating.
- Revised building form allows for prefabricated components made off site and lightweight construction such that transportation of building materials during the construction phase is reduced.
- Significant rock outcrops to the rear and west of the library are retained.
- The buildings are placed such that vegetation can be developed between structures, providing the advantages of micro climate and habitat improvement.

4.5 Stages of the Project

All demolition and construction works will be undertaken over a single period, which is expected to take 16 months to complete. Construction will take into account the requirements of the ecological recommendations in respect to preserving fauna amenity.

5 Statutory Planning Assessment

5.1 Environment Protection and Biodiversity Conservation Act 1999

On the 2nd of August 2007, the proponent was advised by the Department of Environment and Water Resources (DEWR) that the proposal will be considered at the Federal level by the DEWR 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 the DOP and DEWR.

5.2 State Environmental Planning Policy (SEPP) – Major Projects, 2005

The Major Projects SEPP aims to identify certain development to be assessed and approved under the Part 3A provisions of the EP&A Act, 1979.

The proposal is identified as development specified on certain land in Schedule 3 of the SEPP, being the North Head Police Training site and represents a capital investment value of over \$5 million. Schedule 3 identifies that development for a police training facility and any ancillary development may be carried out with development consent.

The Director General has provided clarification that the proposed development constitutes a Part 3A Major Project and is therefore subject to the assessment process under Part 3A of the EP&A Act.

5.3 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:

Provision	Comment
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 the following goals: <ul style="list-style-type: none"> – No erosion and sediment runoff from the site; – No discharge of sediment to Spring Cove; – No discharge of contaminated stormwater; and – No detrimental modification to existing drainage patterns. ▪ Scenic and cultural values of the catchment area will be enhanced by the removal of non heritage structures and siting of new structures in manner that represents a built form compatible with existing heritage buildings on the site and to North Head overall. ▪ 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 fauna corridor areas through the site for foraging.

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.
Planning principles relating to heritage conservation (Clause 15)	<ul style="list-style-type: none"> Heritage qualities of the site will be enhanced by the appropriate and sensitive 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.
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 with macrophytic plant beds that will act as a natural filtration body to minimise impacts to the aquatic conditions of Spring Cove.
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: <ul style="list-style-type: none"> Architectural form and scale reflects the small scale cottage forms of the original buildings on the site; Development is sited and designed to minimise filling and excavation to natural ground level to respect the slope of the land to minimise land disturbance; Development is designed as discreet elements to ensure the visual impact is minimised when viewed in the context of the surrounding national park lands from the foreshore areas.
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. Views to the heritage buildings on the site will be maintained when viewed from the harbour. The development involves the removal of the two dormitory buildings that are elongated in footprint. The separation between proposed buildings may allow for new discreet views to the heritage Axial Hospital Group building from the harbour.
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 register of the National Estate. Accordingly an assessment in respect to heritage impacts are addressed in the EA.
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"> Removal of weed species to cliff edge towards wetland areas will assist in restoration of wetlands area;

	<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. – Habitat areas for the Little Fairy Penguin are retained.
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 respect during the Commonwealth assessment process. The submitted architectural plans have been developed based upon this Master Plan.

The proposal is consistent with the planning principles and relevant provisions of the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005. The main points are summarised below:

- Existing significant landscape, cultural and scenic elements of the site will be maintained through the appropriate siting of individually scaled buildings.
- The proposal enhances the heritage qualities of the site through the retention and preservation of significant heritage buildings and the sensitive siting of new buildings.
- 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 pits 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 scenic quality of Sydney Harbour will be maintained by built form additions of a suitable scale and form to minimise visual impact.

5.4 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.

Ecological Assessment		
<ul style="list-style-type: none"> ▪ 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: <ul style="list-style-type: none"> - Sandy Beaches; - Seagrass Beds; and - Mixed Rocky Intertidal and Sand. 		
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 to prevent reducing productivity and destruction of seagrass communities; ▪ Protect food sources for grazing organisms; and ▪ Maintain algal growth in intertidal zones by retaining light penetration. 	<ul style="list-style-type: none"> ▪ Proposed building setbacks and height will not overshadow seagrass areas and intertidal zones in Spring Cove. Refer to submitted shadow diagrams. ▪ No impacts to food sources for grazing organisms as development is well setback from Spring Cove. 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: <ul style="list-style-type: none"> - 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 with macrophytic planter beds 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 the Spring Cove.

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 a minor increase in the building footprint area (0.5% of the site area), which will retain the existing general visual presence of built form. Building height and form are limited to single and two storey pavilion structures that allow for retention of significant trees and landscape between buildings to generally retain the existing landscape setting. Siting of the development is located on an existing level area which does form part of a cliff edge, rock shelf or beach. No water-based structures are proposed. Proposed materials and colours to appropriately complement 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: <ul style="list-style-type: none"> 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. Minimise loss of views. 	<ul style="list-style-type: none"> Development is sited to achieve the following: <ul style="list-style-type: none"> Setbacks to the site's cliff edge range from 10 to 20m, providing appropriate setbacks to Spring Cove Key native vegetation areas are retained. This includes the existing vegetation in the northeastern corner of the site that has been identified as a landscape area of high value; and the preservation of native grasses and developing Fig trees on the cliff edge. All proposed buildings are designed to address Spring Cove. Removal of elongated buildings in front of the heritage significant “Axial Hospital Group” building and replacement with low rise pavilion structures which will assist in enhancing views to the heritage building from the waterway. Development is confined to existing developed areas above the site's cliff edge. No impacts to loss of views from surrounding vantage points due to the low rise nature of the development.
Planting	<ul style="list-style-type: none"> Provide a landscape plan and provide for: <ul style="list-style-type: none"> Incorporation of appropriate species found in the surrounding landscape. 	<ul style="list-style-type: none"> Landscape plan submitted and includes: <ul style="list-style-type: none"> the retention of significant trees, landscape areas and preservation of native grasses and developing Fig trees on the cliff edge. Net increase to number of trees.

	<ul style="list-style-type: none">- Include endemic native species where native vegetation is present.- Retain mature vegetation where possible and development along ridgelines.- Avoid exotic species.	<ul style="list-style-type: none">- Weed species will be managed out of the site and replaced with endemic vegetation.- Implementation of vegetation species endemic to the locality.
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The proposal complies with the relevant performance criteria for development adjoining high conservation communities as set out in the Sydney Harbour Foreshores and Waterways Area Development Control Plan 2005. The key points are summarised below:

- Urban run-off will be improved and managed through the establishment of a natural creek.
- Appropriate building setbacks and the site's orientation will eliminate any threat of the buildings overshadowing seagrass areas or impacting upon adjacent aquatic ecological communities.
- Building height, form and materials complement the surrounding natural bushland setting and the siting of the buildings allow for the retention of significant trees and landscaping on the site.
- The proposed development is confined to the existing developed areas and will not impact upon the existing foreshore access to Collins Beach.
- The proposal will not detrimentally impact upon any of the existing views around the site due to the low rise scale of the proposed buildings.

5.5 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 recently 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.

Provision	Comment
Visual and aesthetic protection on certain land (Clause 17) <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"> ▪ Visual impacts to the foreshore scenic protection area of North Head were fundamental considerations in design of the subject scheme. ▪ Extensive consultation processes have been instrumental in achieving a design scheme that is based upon small scale built forms integrated with the retained built forms and the bushland setting.
Impacts upon environmental heritage (Clauses 18, 19, 20, 22) <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 MLEP 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 as part of the EA. ▪ Proposed works are confined to within 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 a Conservation 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.

	<ul style="list-style-type: none"> Under Part 3A provisions, this Major Project Application will be referred to the Department of Environment and Climate Change and the Heritage Council.
Services (Clause 30) <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.

As noted above, the site is zoned No.8 National Park under the LEP 1988, however the site is listed as a State Significant Site under Schedule 3 of the Major Projects SEPP which provides the statutory mechanism to permit the proposal subject to the approval of the NSW Minister for Planning. Notwithstanding, the proposal has been assessed against the relevant provisions of Manly LEP where it is concluded that:

- The development will provide for an appropriate visual and aesthetic built form that preserves the scenic amenity of the North Head foreshore area.
- The proposed development represents an appropriate form of development in respect to the heritage value of the site. The proposed works will include the preservation of heritage items, to be guided by a Conservation 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 no Aboriginal archaeological sites were identified on the site,
- The site is currently serviced and future development will be accommodated in accordance with Sydney Water requirements.

5.6 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.

Objectives	Comment
Conservation, protection and recovery of native threatened and endangered flora and fauna.	<ul style="list-style-type: none"> Retention and enhancement of fauna habitat such as the Little Fairy Penguin and the foraging areas for the Long-nosed bandicoot were one of the fundamental considerations in the siting of the subject scheme. Extensive consultation processes with government agencies and detailed ecological impact studies have been instrumental in achieving a scheme that maintains the integrity of the fauna habitat and significant flora areas. A Construction environmental management plan and an Operational 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.

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.
Minimisation of impacts to environmentally sensitive areas and cultural heritage.	<ul style="list-style-type: none"> Extensive consultation processes have been instrumental in achieving a design scheme that is based upon small scale built forms integrated with the retained built forms and the bushland setting such that there are no visual impacts. Sensitive siting of buildings ensure no impacts to the heritage significance of the site. The proposed works represent an appropriate form of development for the site and to be guided by a Conservation Management Plan. Preservation of fauna habitat such as the Little Fairy Penguin and the foraging areas for the Long-nosed bandicoot ensures that impacts are minimised.
Protection of areas of high natural or built aesthetic quality.	<ul style="list-style-type: none"> Extensive consultation processes have been instrumental in achieving a design scheme that is based upon small scale built forms integrated with the retained built forms and the bushland setting such that the visual amenity of Spring Cove is protected.
Design and siting of development to complement surrounding environments and promote good aesthetic qualities.	<ul style="list-style-type: none"> The design scheme is based upon small scale built forms integrated with the retained built forms and the bushland setting. External finishes are selected to complement the heritage buildings on site and the natural surrounds.
Management and conservation of cultural heritage places and items.	<ul style="list-style-type: none"> The refurbishment and redevelopment will be undertaken in accordance with a heritage conservation management strategy.
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.

The proposal is consistent with the objectives of the NSW Coastal Policy. The main points are summarised below:

- The proposed development has been planned with careful consideration of the significant fauna habitats around the site and will result in preserving these habitats.
- The proposed development represents an appropriate form of development in respect to the heritage value of the site. The proposed works will include the preservation of heritage items, to be guided by a Conservation Management Plan. Proposed works are confined to within areas already occupied for the current use and will entail minimal excavation works. Aboriginal archaeological investigations identify that no sites were found on the site.
- The visual amenity of Spring Cove will be maintained through the proposal's small scale building scheme which have been designed to integrate with the built forms and natural surrounds.
- Ecological Sustainable Design principles are to be incorporated into the proposal's design in order to assist in conserving the environment.

5.7 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:

Desired Future Character	Comment
Relationship to the environment <ul style="list-style-type: none"> 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 will be sited in a manner that does not impact upon the heritage values of the site and North Head. Bushfire management of the site currently occurs by the provision of asset protection zones (APZs) both within the site and adjacent National Parks land. These existing APZs will be maintained; whilst it is understood that DECC will be providing additional bushfire management works on National Parks land. Ecological assessment confirms that no detrimental impacts will occur. 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 natural 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.
Visual Sensitivity. <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. The removal of elongated existing buildings and replacement with small scale, individual built forms represents an improved contextual relationship between new buildings and the heritage considerations of the site and North Head, particularly viewed from public domain areas. The development scheme will adopt building heights similar to existing buildings on site, maintaining existing views to the vegetation of the National Park setting.

Edges to the water and natural areas <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 are proposed.
Access <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 from the existing road. Collins Beach Road. Pavilion forms generally raised off the ground and linked by a series of boardwalks to protect landscape and provide for fauna movement.
Buildings <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"> The design scheme is based upon small scale built forms integrated with the retained built forms and the bushland setting. Pavilion forms generally raised off the ground and linked by a series of boardwalks to protect landscape and provide for fauna movement. 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.
Heights <ul style="list-style-type: none"> Limit buildings to up to 2 storeys. 	<ul style="list-style-type: none"> New development is limited to predominantly single storey with some two storey forms to the south-eastern corner of the site, away from the site's foreshore frontage.

The proposal is consistent with the desired future character guidelines as set out in the Coastal Design Guidelines for NSW. The key considerations to note are:

- Appropriate building setbacks from Spring Cove's foreshore and the proposal of new buildings to be sited in areas that have already been disturbed to preserve appropriate relationship between the proposed development and the environment.
- The proposal consists of a number of small individual buildings as opposed to larger, more evasive forms, resulting in a development that minimises its visual impact, particularly from the foreshore.
- Pavilion forms are generally raised off the ground and the primary linkages between the buildings are a series of above ground boardwalks allowing the movement of fauna throughout the site and minimising site disturbance.

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
<p>Defining the settlement footprint</p> <p>To control coastal sprawl, the guidelines recommend the following principles in which coastal settlement can accommodate development:</p> <ul style="list-style-type: none"> 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 within an existing developed site.
<p>Connecting open spaces</p> <ul style="list-style-type: none"> 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 established of green corridors between buildings for fauna movement. Setbacks from boundaries will assist in providing protection from potential bushfire threat from National Park areas. The removal of existing buildings and replacement with small scale, individual built forms represents an improved contextual relationship and setting between new buildings and the heritage considerations of the site and North Head.
<p>Protecting the natural edges</p> <ul style="list-style-type: none"> 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 critical 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 removal of existing buildings and replacement with small scale, individual built forms provide an appropriate scale and design will preserve the scenic amenity of the coastal foreshore areas.

<p>Appropriate buildings in a coastal context.</p> <ul style="list-style-type: none"> 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 eg driveways, widths and lengths Ensure developments and neighbouring properties have access to daylight, natural ventilation, privacy (visual and acoustic), private open space, pleasant microclimate <p>Prominent coastal sites should:</p> <ul style="list-style-type: none"> 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"> New buildings are sited and designed to respond to the heritage significance of the site and North Head by adopting appropriate building setbacks, footprints and heights relative to the local and regional historic, visual and environmental context. The removal of existing buildings and replacement with small scale, individual built forms represents an improved contextual relationship between new buildings and the heritage considerations of the site and North Head. The development scheme will adopt building heights similar to existing buildings on site. Vehicular access areas and car parking are proposed to the rear areas of site to minimise visibility of paved surfaces from coastal vantage points. No amenity impacts to residential properties due to the isolated nature of the site. Development is limited to an existing developed lot with an insignificant increase in building footprint of 0.5% of the site area. No impacts to adjoining public open space by adopting appropriate setbacks and confining development to within existing cleared areas of the site that are currently utilised by AIPM. Individual pavilion style dwellings represent appropriate built form scale and design relative to existing historic buildings on site.
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The proposal is consistent with the design principles set out in the Coastal Design Guidelines for NSW. The key considerations to note are:

- The proposed site coverage represents an insignificant increase that equates to 0.5% above the existing building site cover demonstrating the proportion of unbuilt upon area is to be generally unchanged.
- Ecological corridors will be improved through the design of the separate pavilion style buildings, partially raised off the ground that will enhance fauna movement on the site.
- 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.

6 Consultation

6.1 Agencies and Other Authorities

Consultation with the following government agencies was undertaken in the development of the subject design scheme during the Commonwealth process and /or the preparation of the EA as follows:

- Manly Council
- Commonwealth Department of Environment and Water Resources
- NSW Department of Environment and Climate Change
- Heritage Office, Department of Planning
- Sydney Harbour Federation Trust
- NSW Department of Primary Industries
- Metropolitan Local Aboriginal Land Council (currently being undertaken)
- NSW Rural Fire Service
- All utility providers

The following Table summarises details of the associated outcomes in respect to the Eco-heritage Master Plan and / or the final design.

Table 1 – Consultation Summary

Agency	Comments
Manly Council	<ul style="list-style-type: none"> ▪ The development represented in the Eco-heritage Masterplan was a definite improvement to the original scheme. ▪ Requested a copy of the 1979 Land Exchange Agreement.
Commonwealth Department of Environment and Water Resources	<ul style="list-style-type: none"> ▪ The development is classified as a “controlled action” under the Environmental Protection Biodiversity Conservation Act and assessment will be undertaken as a “one off bilateral assessment”. ▪ Assessment will be reviewed in consideration to both Commonwealth and State technical requirements.
NSW DEC Parks & Wildlife Division	<ul style="list-style-type: none"> ▪ The Eco-heritage Masterplan was superior in a number of ways and represented a good outcome from the consultative process and were generally supportive of the plan.
Heritage Office, Department of Planning	<ul style="list-style-type: none"> ▪ Discussions with the NSW Heritage office indicate that the proposal will be further reviewed, particularly in respect to certain recommendations of the Conservation Management Plan.
Sydney Harbour Federation Trust	<ul style="list-style-type: none"> ▪ The proponent’s Heritage Consultant, NBRS&P has approached the Sydney Harbour Federation Trust for consultation but at this stage no discussions have taken place. ▪ The Federal process already included consultation with a representative from the Sydney Harbour Federation Trust.
NSW Department of Primary Industries	<ul style="list-style-type: none"> ▪ The Federal process already included consultation with a representative from the Sydney Harbour Federation Trust.
Metropolitan Local Aboriginal Land Council	<ul style="list-style-type: none"> ▪ Ongoing consultation. MLALC provided input into methods of survey for Indigenous archaeological sites but did not attend the survey.

NSW Rural Fire Service	<ul style="list-style-type: none"> ▪ Extensive consultation was undertaken over the development of the Eco-heritage Master Plan to provide for bushfire mitigation measures. The bushfire report by the proponent's bushfire consultant concludes the providing all recommended mitigation measures are implemented; the site will meet the requirements of relevant bushfire provisions.
All utility providers	<ul style="list-style-type: none"> ▪ Utility providers have been previously consulted and will continue to be consulted during the implementation of utilities.

6.2 Public Consultation

The initial Commonwealth process involved an extensive public consultation process, including an inquiry process by the Parliamentary Standing Committee on Public Works.

The inquiry process involved public participation through:

- Advertisement of the Inquiry in the Sydney Morning Herald on 22 April 2006;
- Submissions sought from relevant government agencies, and potentially affected / interested private organisations and individuals; and
- An inspection by the Committee and a public hearing on the 2 June 2006.

The inquiry process lead to further consultation with Manly Council, other key stakeholders and the local community to resolve community concerns during October – December 2006. The outcomes associated with the required consultations were referred to the Parliamentary Standing Committee on Public Works (the Committee) where the Eco-heritage masterplan was accepted by the Committee as a “more appropriate outcome for the site.”

Documentation relating to the Parliamentary Standing Committee on Public Works is attached under **Appendix C**.

Aboriginal community consultation was also undertaken in accordance with the Department of Environment and Climate Change Interim Guidelines for Consultation by McCardle Cultural Heritage Pty Ltd as part of the Indigenous archaeological investigations for the site.

7 Key Planning Considerations

The key planning considerations in respect to the proposed development are based upon the matters raised under the DGR. The following sections of this EA respond to each DGRs in conjunction with specialist reports. For further assessment and detail refer to the relevant individual specialist report Appended to the EA.

7.1 Impact on Threatened Species

Flora and fauna investigations have been carried out by AHA Ecology. AHA Ecology has prepared an addendum to the original Ecological Assessment Report which related to the scheme considered by the Commonwealth. The submitted addendum by AHA Ecology particularly reviews the final design scheme submitted with this EA and addresses the considerations raised under the DGRs.

The original Ecological Assessment Report was prepared by GHD and should be read in conjunction with the addendum. Both Ecological reports are attached under **Appendix D**.

The assessment was undertaken with respect to the draft “*Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities, Commonwealth Environment Protection and Biodiversity Conservation Act 1999: Guide to implementation in NSW: March 2007*”. In addition, regard to any draft or final recovery plans relating to threatened species are also addressed. The addendum further provides recommendations for offset measures to avoid or mitigate impacts of the project on threatened species and their habitat.

The report provides an assessment of the potential ecological impacts of development within the AIPM site. In addition, the report provides an assessment of the potential ecological impacts relating to the implementation of a 20m wide Strategic Fire Protection Zone (SFPZ) over the adjacent National Parks land. A SFPZ is an area that is subject to irregular prescribed burning as part NPWS bushfire management and it is understood that prescribed burning occurs once every 5 years by NPWS DECC.

The proponent’s bushfire consultant, Bushfire Protection Planning & Assessment Services does not require a SFPZ to be provided as part of this proposal in view of their recommended package of fire mitigation measures. However, the establishment of a SFPZ would obviously be favourable and it is understood that it is NPWS who will determine whether such a SFPZ will be provided. However, as advised by the proponent’s bushfire consultant, such a requirement is not necessary in achieving satisfactory bushfire mitigation measures for this development. Notwithstanding, AHA Ecology has undertaken an assessment of the potential ecological impacts in the event a SFPZ is provided over National Parks lands.

The majority of the AIPM site has been previously cleared however the site’s location at North Head, adjacent to the Sydney Harbour National Park and the presence of two endangered populations on the AIPM facility makes stringent ecological management of the site a priority. Relevant to key threshold considerations and studies undertaken, it is assessed the proposal will not detrimentally impact upon the ecological values of the site and the surrounding National parks land as detailed below:

- 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. As the AIPM is a cleared area, redevelopment of this area would not result in further fragmentation of the National Park or fragment any current vegetated corridors. If an SFPZ is to be established on the fringes of the National Park and edges of the AIPM site, modification of this vegetation through prescribed burning would not further isolate connecting habitat. The establishment of a SFPZ will not adversely affect the ecological values of the National Park and in some instances will actually enhance habitat value by providing additional foraging opportunities for threatened fauna species; whilst providing more suitable areas for certain threatened flora species and encouraging the propagation of certain threatened flora which occurs after the event of a fire.
- Strict implementation of the Construction Environmental Management Plan (CEMP) would protect the Long-nosed Bandicoot and the Little Penguin during construction.

- The overall outcome for the Long-nosed Bandicoot on site would be maintained, or marginally improved, by the inclusion of landscaped refuge areas and the construction of raised accommodation blocks walkways.
- The overall outcome for the Little Penguin on site would be maintained through the inclusion of design features which protect the nest sites, for example the rotation of Common Room away from the Little Penguin nests sites.
- Stringent and diligent adherence to the implementation of the CEMP would protect the Critical Habitat from adverse impacts.

The report further advises that the strict implementation of the CEMP is also critical in the protection of the adjoining Sydney Harbour National Park as the majority of the potential risks to biodiversity are associated with the construction phase. The management measures outlined in that document would prevent major impacts on either of these endangered populations. It is also assessed that the operational aspects of the redevelopment of the AIPM site would not be substantially different to current levels and could be managed successfully to avoid long term impacts on the Little Penguin and Long-nosed Bandicoot populations on site.

7.2 Heritage

European heritage and conservation considerations of the site and the proposal have been assessed and undertaken Noel Bell, Ridley Smith & Partners (NBRS&P). NBRS&P has provided reports that provide a heritage assessment of the site; a heritage impact statement; and a conservation plan, attached under **Appendix E** that address the DGRs.

Indigenous Archaeological Assessment has been undertaken by McCardle Cultural Heritage Pty Ltd and is attached under **Appendix F**.

7.2.1 Heritage Significance of the Site

The heritage significance of the AIPM site is associated with North Head as a whole for military, quarantine, defence, ecological and indigenous heritage values. The AIPM site is widely recognised with significant cultural, heritage and historical significance. The existing buildings have an historical relationship with the North Head built environment and the adjacent old Quarantine Station.

The heritage status of the AIPM precinct entails:

- Local Government Listing: The AIPM site is listed under Manly Local Environmental Plan 1988 (LEP), under Schedule 4 as a local heritage item.
- State Government Listing: The site is not listed under the NSW Heritage Act and is not on the State Heritage Register nor have any conservation orders placed upon it.
- Commonwealth Government Listing: As part of a larger listing of the greater part of North Head, the site is a listed place on the National Heritage List. While the land is included in this listing, the listing partly excludes the former Seamen's Isolation Hospital from one of the assessed values.

Accordingly a heritage assessment of the AIPM has been carried out by NBRS&P by utilising both National and Commonwealth Heritage Criteria, where it is concluded that the site has outstanding heritage value in respect to:

- Importance in the course, or pattern, of Australia's cultural history.
- The presence of uncommon, rare or endangered aspects of Australia's natural or cultural history.
- Importance in demonstrating principal characteristics of class of Australia's cultural places or cultural history.
- Association with particular persons and group of persons of importance to Australia's cultural history.

- Importance as part of Indigenous tradition.

However the assessment also identifies that the site does not sufficiently warrant outstanding heritage value classification in respect to:

- Contribution to an understanding of Australia's natural or cultural history.
- Exhibiting particular aesthetic characteristics valued by a community or cultural group.
- Importance in demonstrating a high degree of creative or technical achievement of a particular period.
- Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

Overall, the site represents important cultural and natural richness and diversity and features outstanding ecological elements, whilst expressing historical themes of quarantine, military and recreational use.

An assessment of the significance of individual components of the site that contribute to the overall significance of the AIPM site and its setting identifies the following:

- There are no items of exceptional significance.
- The Axial Hospital Group including ward blocks and dispensary but not the kitchen and dining room represent high significance.
- Of moderate significance are the former staff cottages, the kitchen and dining room of the Axial Hospital and the administration building.
- Little significance in the dormitories north of the Axial Hospital Group, senior common room, the library, the syndicate building. Intrusive elements are the infill adaptation of the former ward blocks.

7.2.2 Heritage Impact Assessment

An assessment of the heritage impacts of the proposal has been undertaken by Noel Bell & Ridley Smith & Partners which address the following considerations in accordance to the DGRS:

- Built and cultural heritage;
- Landscaping;
- Views to and from the site;
- Built fabric and existing internal spaces; and
- European archaeology.

The assessment has been carried out in accordance with the NSW Heritage Office's guide to preparing Statements of Heritage Impact and concludes that the proposal will respect or enhance the heritage significance of the item or conservation area for the following reasons:

- The items of highest significance including the Axial Ward Group and the Garden Cottage are retained and adaptively reused;
- Removes elements of low significance and allows for continued use of the place; and
- The redevelopment includes new buildings of similar scale, form and materials which retain the character of the complex in its isolated, harbour-side, bushland setting.

Minor aspects of the development were assessed to not fully meet the recommendations of the Conservation Management Plan. However, mitigating measures have been included to minimise upon such impacts.

The matters include painting of potentially unpainted areas of the axial hospital group and the garden cottage; and the partial building over the early roadways (the former jetty road and the former quarantine station road).

7.2.3 Visual Assessment and Impact on Heritage Items in the Vicinity

The Statement of Heritage Impact includes an assessment of the visual impact of the proposal and potential impacts to adjacent heritage items. Adjacent heritage items entail North Head as a whole; Manly District Hospital to the northwest; St Paul's College and the Cardinal's Palace across from Spring Cove; and Former Gasworks Site across Spring Cove at Little Manly Point.

The site and its associated structures are visible from some parts of these heritage items, in which the visual relationships are derived from 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 behind the group. The visual relationships are confined to the valley on either side of Spring Cove with more distant views from the open water to the west. It is assessed that the redevelopment will not intrude into the visual setting of adjacent heritage items as the development will generally retain the quality of the existing views to the site and retain the untouched foreground and background of bushland setting. Whilst the additional buildings will be visible from outside the site, the compact and isolated character of the site will be retained such that there will be no impact to the visual setting of adjacent heritage items.

With respect to impacts upon key views to the site, an assessment of the views from Collins Beach; from land across Spring Cove; and from more distant views from the Harbour west of Many Point was carried out. It is concluded that the development scheme represents an appropriate addition to the a sensitive site because:

- The complex will remain largely hidden by foreground vegetation as currently the case when viewed from Collins Beach.
- The view from across Spring Cove will experience the most notable change as the land is at a similar height, such that the new buildings will be more visible. However, the quality of the view as a compact group of similar forms using common materials in an isolated bushland setting above the water will be retained.
- From more distant views, such as from Manly Ferry, the proposed development will not be readily perceived. This is due to the distance from the site and the visibility of the North Head Plateau behind the site which further diminishes the perceived scale of the development.

7.2.4 Conservation Management

A Conservation Management Plan for the site has been prepared by Noel Bell Ridley Smith & Partners to guide the short to long term management of the non-Indigenous heritage values of the site and is attached under Appendix E. The major recommendations of the CMP include:

- The establishment of processes to manage the heritage values of the site.
- The retention, continued adaptation and eventual restoration of the Axial Hospital Group and one of the former staff cottages (Garden Cottage) and elements of the setting.
- Provision for the removal of more recent structures and the option to develop new structures of compatible scale and character on the AIPM site.
- Protection of significant fauna habitats and buffers.
- Support for the 2006 Eco-Heritage Master Plan as the principal means of implementation of the recommendations in the short to medium terms.
- Supporting heritage interpretation to illustrate obscure elements of the site's heritage significance.

The proposed redevelopment scheme should be accepted as the key to implementing the recommendations of the conservation management plan within the next two years. Those other recommendations within the CMP can be implemented over the medium to long term.

7.2.5 Indigenous Archaeological Assessment

Indigenous archaeological assessment was undertaken by McCardle Heritage Pty Ltd and included Aboriginal Community Consultation in accordance with the Department of Environment and Climate Change Interim Guidelines for Consultation. The report by McCardle Heritage Pty Ltd is attached under **Appendix F**.

The results of the archaeological assessment identified that no archaeological sites and no “Potential Archaeological Deposit” sites are identified within the study area due to the disturbances and lack of evidence of past occupation. The level of disturbance to the site is such that it is considered that there is no potential for sub-surface deposits.

Specific management strategies as outlined in the Aboriginal Cultural Heritage Standards and Guidelines Kit (NPWS 1987) for the management of identified sites and potential archaeological deposits within study areas were considered. As no archaeological sites and “Potential Archaeological Deposit” sites were identified, there are no requirements to undertake the management strategies. However, it is recommended that the persons responsible for the management of any works on site will ensure that all staff, contractors and others involved in construction and maintenance related activities are made aware of the statutory legislation protecting indigenous sites and places of significance.

7.3 Urban Design, Built Form & Visual Impact

As required by the DGRS, several photomontages have been prepared to demonstrate the appearance of the scheme from select public vantage points: Collins Beach; Manly Ferry; and the northern side of Spring Cove, towards the southern end of Stuart Street. The photomontages are attached under **Appendix G**.

Assessment under the Coastal Design Guidelines for NSW and the NSW Coastal Design Policy 1997 has been undertaken under Section 5 of the EA and a review of the photomontages identifies that the proposed development scheme satisfactorily achieves the objectives of managing the coastal zone and foreshore areas.

- The development entails appropriate building heights, setbacks, site cover and external materials and finishes that are appropriate to the coastal context of the site, the foreshore and the adjoining bushland setting.
- The proposal consists of a number of small individual buildings with well articulated and scaled elevations to appear as “pavilion” like structures that integrate appropriately with the heritage character of the site.
- Single storey dwellings are sited to the north of the heritage significant Axial Hospital Group building. The proposed height, reflective of the retained Spring Cove Cottage building enhances the visual appreciation of the Axial Hospital Group from the harbour and to the north. Similarly, the separation achieved between buildings and the pitched roof forms may enhance vistas into the site towards a significant heritage item.
- The proposed two storey buildings are sited to the west and south-west the Axial Hospital Group. By adopting similar architectural character to the proposed single storey forms and complementary roof forms, materials and colours, the development will fit comfortably within the overall historic and coastal setting of the site.
- Whilst providing for a buffer area to endangered fauna, proposed setbacks from the northern escarpment ensures that the development retains its recessed position from the foreshore and Collins beach, preserving the scenic amenity of the coastal and adjoining open space.

- It is intended that a limited and durable palette of materials be adopted for proposed built forms. These materials will draw upon those already used by the heritage buildings, although there will be less reliance upon painted timber surfaces that require extensive and short cycle maintenance regimes. (Refer to **Appendix A**). External finishes are predominantly neutral in tone to blend with the natural surrounds; whilst highlight colours will accent limited key elements to assist with distinguishing the contemporary design without detracting from the heritage values of the site.
- The proposed site coverage of 3,486sqm excluding car parking over a site area of 18,396sqm equates to 19% of building footprint. This proposed footprint is an increase of 107sqm in addition to the existing footprint and represents an insignificant increase equating to 0.5%. This demonstrates that the proportion of unbuilt upon area is largely unchanged and provides opportunity to enhance the extent of on site landscape area.
- Landscape works are designed by Taylor Brammer with objectives of minimising the visual impact of the proposed development by preserving existing landscape features and enhancing the natural setting by implementing new landscape elements that comprise species endemic to North Head and the locality including proposed Black Sheoak and Coast Banksia.

7.4 Traffic

Potential traffic and parking impacts have been assessed by specialist traffic engineers TEF Consulting and is attached under **Appendix H**. Based upon traffic and parking survey and analysis, the proposal is supportable on traffic and parking considerations. The assessment identifies that:

- Anticipated volumes of traffic associated with the AIPM use will not detrimentally impact the operation of the existing traffic network. It is assessed that traffic associated with the proposal will not alter existing Levels of Service to key intersections.
- Anticipated parking demands are envisaged to be in the order of 44 to 55 car spaces which will marginally exceed that proposed of 43 spaces (excluding the bus/service delivery space) during periods the AIPM facility is at the maximum capacity. Whilst this will not be a daily occurrence, it is recommended that management of visitors to the site involve utilising additional mini bus services or encouraged taxi service usage. Overall, the increased parking demand can be managed to achieve a satisfactory outcome.
- Car park design and layout is assessed to meet the provisions of the relevant Australian Standards.

7.5 Bushfire

Bushfire risk assessment and mitigation issues have addressed by Bushfire Protection Planning & Assessment Services and documented within the report attached under **Appendix I**. The investigations have been based on considerations to:

- NSW Planning for Bushfire Protection (PBP) 2006.
- BCA and AS 3959 – 1999.
- Extensive pre-development discussions with various stakeholders including National Parks and Wildlife Service, the NSW Fire Brigades, the Bushfire Management Committee for North Head and the Development Control Unit for the NSW Rural Fire Services.

An assessment of the surrounding conditions identifies that the site is bushfire prone land due to the presence of bushland to the south, east and to a lesser degree from the west. Extensive consultation has taken place with:

- National Parks and Wildlife Service to provide effective asset protection zones adjacent to the subject development site boundaries.

- NSW Rural Fire Service Development Control Unit to provide an effective package of fire protection and bushfire mitigation measures for the subject development site. It is noted that consultation with these stakeholders were initiated when the proposal was before the Commonwealth process, which provided for an acceptable resolution to all parties and will be implemented in the current scheme.

It is also noted that the NSW Legislative Requirements for Design and Building in Bushfire Prone Areas are not a mandatory requirement for this development. However the proponent has voluntarily accepted that the subject development site will satisfy these requirements.

As a consequence, there has been an emphasis in this report on conforming to the requirements and principals as outlined in the PBP document as far as reasonably practicable.

The report has considered all of the elements of bushfire attack and the compensation measures listed are required to be considered as a complete package to provide the required protection from bushfire attack.

It is assessed that provided the development is constructed in accordance with the recommendations outlined in the report, the proposed new and redeveloped buildings can satisfy the objectives and performance requirements of the Building Code of Australia, Australian Standard 3959 and the aim and specific objectives of NSW Planning for Bushfire Protection 2006. Correspondence from NSW Rural Fire Service is provided within **Appendix I** indicating that the proposal and associated mitigation measures recommended by Bushfire Protection Planning & Assessment Services are satisfactory.

The recommendations entail:

- Asset protection zones
 - The entire site, or at least within 20m of new or existing buildings should be managed as an Inner Protection Area.
 - Existing and proposed APZ areas to be maintained over National Park land directly adjacent to the site. This involves 10m adjacent to the western and southern boundaries; and 3m adjacent to the eastern boundary. These areas should be managed as an Inner Protection Area. It is noted that an APZ currently exists on the National Parks land immediately adjacent to the site's western, southern and part eastern boundary. It is understood that the APZ is currently required to be 10m wide adjacent to site's western and southern boundaries under existing bushfire management regime of the National Park.
 - Building setbacks for proposed buildings should be a minimum of 12m from the southern boundary and 10m from the east and west boundaries.
- Water supplies
 - Installation of a 22,000 litre capacity water tank dedicated for fire protection purposes if existing mains pressure and flows cannot be consistently maintained during a bushfire event. Recommendations include specifications to ensure compatibility with NSW Fire Brigades fittings and construction materials.
 - Provision of additional hydrant connection points where any section or elevation of new or existing buildings are located greater than 90m from a hydrant connection point.
- Vehicular access and egress
 - New or redeveloped vehicular access roads to be constructed and maintained to the minimum design criteria as outlined in PBP; and to facilitate access for Category 1 fire fighting vehicles.
 - Design to allow for adequate vehicle turning and manoeuvring.
- Emergency & bushfire management planning / management
 - A Bushfire & Vegetation Maintenance Plan be developed in consultation with local fire authorities.

- The existing Emergency Procedures Handbook be periodically reviewed in consultation with local fire authorities.
- Construction Standards
 - All proposed buildings and alterations and additions to existing buildings shall be constructed in accordance with AS3959, 1999 levels 1 – 3.
 - Specific construction recommendations are made for sections / elevations of the development identified as “flame zone”. This includes utilising fire rated glazing or toughened glass with metal shutters; installation of metal screens to cover glazing; and no external exposed timber.
 - Utilise gutter guards or do not implement gutters and downpipes to prevent build up of debris.
 - As far as practicable, upgrade existing buildings that are proposed to remain unchanged, to improve ember protection.
 - Install a 2m high radiant heat barrier between the Garden Cottage and unmanaged bushfire vegetation within Sydney Harbour National Park (i.e to the W- SE of Garden Cottage).

Bushfire Protection Planning & Assessment Services further advise that final and completed construction of the site would be afforded a greater level of bushfire safety protection, for both buildings and occupants, than as otherwise exists. Overall, the subject development provides an improved outcome for bushfire safety by the application of the principle “measures in combination”.

7.6 Utilities Infrastructure

An infrastructure report has been prepared by Medland Metropolis (**Appendix J**) that identifies the required upgrading works to meet the needs of the development in respect to:

- Power
- Gas
- Potable water
- Sewage

Power is currently provided to the site via a pole mounted substation. It has been determined that the existing substation will be able to accommodate the proposed development and there will be no need for any upgrade works.

The site is currently serviced by a stand alone gas tank which will be relocated to outside the bushfire exclusion zone.

At present the site is serviced by a Sydney Water town water supply augmented. The proposed development will result in an increased demand for water on the site, which will be by rainwater harvesting. An on site water storage tank for fire fighting will be provided in accordance with the recommendations of the bushfire consultant.

The site is currently connected to the Sydney Water sewage system and has sufficient capacity and will not require upgrading.

7.7 Impacts on Water Quality and Drainage

Civil / Stormwater management is designed by J.J Marino & Associates which will include systems to manage the quality of stormwater run-off to maintain and improve the water quality of the adjacent harbour. On behalf of J.J Marino & Associates, CRW Consulting Engineers has prepared a Site Stormwater Assessment Report, attached as **Appendix K** to this EA.

The proposed stormwater management scheme will entail “best practice” stormwater treatment measures such as:

- methods of intercepting contaminants prior to discharge,
- maintenance schedule for the stormwater system and its components,
- a soil erosion and sediment control strategy during construction,
- a construction activity strategy to minimise impact on the stormwater water system and its discharge.

Particular Water Sensitive Urban Design measures include the creation of a new “natural creek” through the site. A drainage line currently passes through the centre of the site from the National Park towards the site’s cliff edge at the north. This drainage line is currently partly contained on the site within a boxed culvert.

As part of the proposal, this drainage line will be re-established and embellished as “natural creek” to the north of the site, which will provide natural infiltration measures by filtering water through beds of macrophytic planting.

The stormwater management measures are developed in conjunction with AHA Ecology to ensure the proposal will effectively mitigate potential impacts to preserve the ecological values of the site and adjacent habitats. The inclusion of treatment devices for the removal of contaminate that may otherwise be present within the stormwater discharge of the site will improve the water quality entering the environmentally sensitive areas.

The existing stormwater discharge locations have been maintained to avoid impacting on the existing conditions. The introduction of stormwater retention to the site has allowed for greater areas of surface water to be directed into the infrastructure. Post developed stormwater discharging the site will effectively equal pre-developed volumes such that on-site detention is not required. The non requirement to construct such onsite facilities is considered to be an environmental benefit due to the potential construction impacts to the environment that surround the escarpment on the north boundary.

An addendum report by AHA Ecology is submitted with the EA and is included with **Appendix D**. The report concludes that management of on site construction and operational issues through stringent ecological management of the site should be given the highest priority. The assessment identifies that it is unlikely that marine environments distant from Spring Cove have the potential to be impacted by the proposal as any potential impacts would be relatively localised due to the nature of the proposal.

Stringent implementation of the measures outlined in the Construction Environmental Management Plan; the Operation Environmental Management Plan and the Erosion and Sediment Control Plan would ensure that adjacent marine environments are not impacted through sedimentation and pollution events. The design of antiscour / energy dissipation devices to minimise opportunities for erosion, reuse stormwater onsite and the installation of gross pollutant traps will result in no net increase in existing volumes of water being released whilst increasing water quality.

7.8 Ecologically Sustainable Development

Project commitments to Ecologically Sustainable Development principles in design, construction and ongoing operational phases will entail:

- Whole of life costing – consideration will be given to the sum of all costs for plant, equipment and materials including acquisition, installation, operation, maintenance, refurbishment and disposal costs;
- Minimum energy performance - the fit-out works to meet Federal policy;
- Use of energy efficient appliances and equipment where possible;

- Kitchen to be designed to allow the segregation of waste into recyclable, organic and waste to landfill;
- Materials waste minimisation in design and construction;
- Emissions minimisation from furniture, equipment, materials and finishes including paints, sealants and adhesives;
- Old growth forest and rainforest timber will not be utilised;
- Recycled timber to be used or where not feasible, use plantation timber from an area under a Regional Forestry Agreement;
- Maximisation of the use of finishes, furniture, fixtures and equipment with renewable materials; and
- Water consumption and conservation measures including :
 - Dual flush cisterns for all toilets;
 - Flow restriction devices to all fixtures;
 - Water efficient fittings and appliance; and
 - Consideration is to be given to the requirements and recommendations of the Australian Government Water Efficiency Labelling Scheme.
 - To contribute to best practice initiatives by contributing to the collection and re-use of stormwater; and by adopting recycled water for irrigation.

Medland Metropolis have been engaged to design the mechanical, electrical, hydraulic and lift services of the development scheme which entail the following particular ESD measures:

- Mechanical Services
 - Implementation of new air conditioning system that is a combination of VRV (variable refrigerant volume) and inverter driven split air conditioning systems. Both systems provide significant reductions in energy consumption over conventional air conditioning, as they are able to reduce energy demand in response to reduced cooling requirements.
 - Natural ventilation of visitor accommodation buildings.
 - Linking exhaust systems to room lighting controls so that they are switched off when rooms are unoccupied.
- Electrical Services
 - Internal and external lighting is designed in accordance with Section J.6 of the BCA.
 - External lighting is controlled by a combination of photoelectric cell and time clock to ensure that lighting is only operated when it is required.
 - Implementation of electronic ballasts to specified light fittings to minimise energy consumption; and lighting that automatically switches off when visitor accommodation is unoccupied.
 - Suspension of reticulated cabling from boardwalks to reduce requirements for trenching.
- Hydraulic Services
 - Implementation of rainwater harvesting facilities for reuse to water closets and irrigation.
 - Installation of a new below ground grease arrestor below the existing kitchen to mitigate risk spillage.
 - Implementation of gas boosted hot water systems.

- Provision of a bulk water tank for the fire hydrant system, separate from the existing water supply.
- Suspension of reticulated gas and water pipes from boardwalks to reduce requirements for trenching.
- Lift Services
 - Installation of a new generation electric lift to the Administration Building that consumes significant less power than a standard hydraulic lift and does rely upon hydraulic oils.
 - Installation of lifts to double storey visitor accommodation that will be restricted to staff only and to assist in cleaning and movement of luggage.

7.9 Energy Savings Action Plan

The proposed redevelopment has been designed to achieve a four star ABGR rating for new buildings. The provisions of BASIX do not apply to the subject development scheme due to the nature of the existing land use.

A Building Services Report and a separate Energy Saving Report by Medland Metropolis are submitted under **Appendix L** which reviews the NSW Department of Energy, Utilities and Sustainability Guidelines for Energy Saving Action Plan.. The Guidelines are intended to be used for existing buildings with energy records covering a 12 month period, and do not provide design criteria that can be adopted at this stage of the project. In this regard Medland Metropolis has sought to encapsulate the requirements of the Guidelines to facilitate the preparation of a Energy Saving Action Plan once the facility has been rebuilt and has been operational for a period of 12 months. To be able to further analyse the energy usage of the site for energy wastage to be identified and then enacted upon as part of an Energy Saving Action Plan, it is recommended that additional metering be provided to the following buildings, and that these meters be linked together to allow for this information to be collated automatically at a central location with the facilities to provide regular reports:

- Library lighting and power;
- Library air conditioning;
- Kitchen;
- Accommodation buildings;
- Teaching buildings lighting and power;
- Teaching building air conditioning.

8 Draft Statement of Commitments

The Draft Statement of Commitments attached under **Appendix M** details the various mitigation and management measures that the proponent commits to undertake during construction phase and the ongoing operations of the AIPM facility.

The mitigation and management strategies are largely contained within the Construction Environmental Management Plan (CEMP) and the Operational Environmental Management Plan (OEMP) both prepared by Gondwana Consulting and are attached under **Appendix N**. Other commitments are reflected within the Heritage Conservation Management Plan and the Energy Savings Action Plan, which have been detailed in the preceding sections.

The CEMP provides for programs and procedures for environmental management during the construction, which identifies specific commitments, actions and conditions to ensure that the environmental management requirements are managed effectively. The CEMP program specifically relates to the following environmental issues relevant to the site:

- Environmental management procedures;
- Air emissions;
- Flora and fauna;
- Hazardous materials;
- Heritage buildings and sites;
- Noise and vibration;
- Traffic and parking control;
- Waste management; and
- Water quality, stormwater and erosion.

The OEMP has been prepared to establish management programs and procedures to mitigate the potential operational impacts of the upgraded AIPM facility upon the site's flora and fauna habitat; and associated heritage buildings and sites. The OEMP program specifically relates to the following environmental items and considerations:

- Little Penguin;
- Long-nosed Bandicoot;
- Phytophthora (Pc);
- Vegetation, pests and weeds;
- Heritage buildings and sites.

9 Suitability of the Site

The likely impacts of the proposal have been examined in depth in Section 8 above, which demonstrate that the potential impacts of the project can be sustainably managed, resulting in environmental, social and economic benefits. The site is demonstrably suitable to accommodate the proposed development scheme, which already accommodates the AIPM use. The proposed development aims to upgrade the AIPM facilities and in doing will initiate conservation management practices to preserve the historic integrity of the site.

9.1 Environmental Impacts

The range of potential environmental impacts have been addressed as required under the DGRS. Specialist reports have examined the potential impacts and where required, have recommended mitigation measures or strategies to further ensure impacts are suitably managed. Such measures will be included within the Draft Statement of Commitments. In summary, the potential environmental impacts are mitigated due to the following design and construction considerations:

- The proposal will not detrimentally impact upon 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. As the AIPM is a cleared area, redevelopment of this area would not result in further fragmentation of the National Park or fragment any current vegetated corridors.
- The implementation of the 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 to avoid long term impacts on the Little Penguin and Long-nosed Bandicoot populations on site.
- The overall outcome for the Long-nosed Bandicoot on site would be maintained, or marginally improved, by the inclusion of landscaped refuge areas and the construction of raised buildings and boardwalks.
- The overall outcome for the Little Penguin on site would be maintained through the inclusion of design features which protect the nest sites, for example the rotation of Common Room away from the Little Penguin nests sites.
- A Heritage Conservation Management Plan for the site will guide the short to long term management of the non-Indigenous heritage values of the site. The proposed redevelopment scheme should be accepted as the key to implementing the recommendations of the conservation management plan within the next two years.
- The proposed development scheme satisfactorily provides an appropriate addition to the site in terms of visual impact. The development adopts appropriate building heights, setbacks, site cover and external materials and finishes that are appropriate to the coastal context of the site, the foreshore and the adjoining bushland setting. Proposed building forms adopt complementary roof forms, materials and colours to fit comfortably within the overall historic and coastal setting of the site.
- Landscape works are designed by Taylor Brammer with objectives of minimising the visual impact of the proposed development by preserving existing landscape features and enhancing the natural setting by implementing new landscape elements that comprise species endemic to North Head and the locality.
- Potential traffic generation will not impact upon the surrounding road system. Anticipated parking demands will be accommodated on site through the inclusion of utilising alternative transport means during periods of maximum capacity of the AIPM. Overall, the increased parking demand and can be managed to achieve a satisfactory outcome.

- Existing stormwater infrastructure is outdated and offers minimal environmental performances. The civil / stormwater management design will include “best practice” stormwater treatment measures to manage and improve the quality of stormwater run-off to maintain the water quality of the adjacent harbour. This includes particular Water Sensitive Urban Design measures including the creation of a new “natural creek” through the site which will provide natural infiltration measures by filtering water through beds of macrophytic planting.
- Commitments to Ecologically Sustainable Development are embodied within principles in design, construction and ongoing operational phases to ensure the long term broader objectives of sustainability are implemented.

9.2 Social Impacts

The AIPM is part of Australia’s National Common Police Services, which operate under the governance of the Australian Police Minister’s Council and has operated from the site since 1960. The AIPM is a highly important federal resource providing the following services for Australasian and International law enforcement agencies and public safety agencies:

- Senior management and executive development;
- Education; and
- Consultancy services.

The proposal aims to facilitate for improved and enhanced facilities to accommodate increased level of participation at the senior management and executive development level to ultimately improve the operations of National security. This is viewed as an imperative social benefit, not solely at a local level but up to National level, which is reflected by endorsement of the project by the Commonwealths Public Committee Works process.

From a cultural perspective, the proposal is deemed to enhance the awareness of the cultural history of the site. The site has been assessed having regard to its heritage significance in respect to the importance in the course, or pattern, of Australia’s cultural history and importance in demonstrating principal characteristics of class of Australia’s cultural places or cultural history. The proposed development scheme is designed to enhance the presence of the significant heritage items on the site. This has been achieved in a manner that enhances the visual appreciation of the main heritage item Axial Hospital Group from the public domain such as from the harbour and other areas to the north.

Based on the operations of the site and extent of persons associated with the use, there will be no undue additional demand upon social and community facilities.

9.3 Economic Impacts

Capital Investment value of the development is estimated at a minimum of \$16 million and will result in the creation of an additional 10 staff positions which includes educational/training; hospitality and maintenance staff.

In terms of construction, an average of some 30 people will be directly employed in construction activities. In addition, it is anticipated that construction will generate further employment opportunities off site in terms of design, supply, manufacture and distribution of components and materials.

10 The Public Interest

The proposed upgrading and extension of the AIPM facilities are aimed at improving and rationalising the operations of the AIPM. However, as part of the proposed works, it is required to conserve the significant heritage items on the site as part of a heritage conservation management strategy. The heritage assessment of the AIPM site carried out by NBRIS concludes that the site has outstanding heritage value in respect to:

- Importance in the course, or pattern, of Australia's cultural history.
- The presence of uncommon, rare or endangered aspects of Australia's natural or cultural history.
- Importance in demonstrating principal characteristics of class of Australia's cultural places or cultural history.
- Association with particular persons and group of persons of importance to Australia's cultural history.
- Importance as part of Indigenous tradition.

Due to the highly important heritage value placed on the site, the proposed works and conservation management measures associated with project is clearly within the public interest.

Ecological initiatives that contribute to the preserving the endangered fauna and improving water quality of Spring Cove represent resolving community concerns raised during initial public consultation processes. These the initiatives include establishment of a management framework of the OEMP provides performance objectives; mitigation measures; and monitoring/auditing/ reporting; and corrective actions relative to each environmental consideration.

11 Conclusion

The subject design scheme represents an outcome of extensive design revision over several years, through the Commonwealth process. The proposal has been considered under the relevant provisions and key issues identified within the Director General's Requirements for this Major Project Application.

It is concluded that the development should be approved having regard to the following:

- The proposed design scheme has been extensively developed in consultation with the government stakeholders and the local community through the Federal legislative process.
- The proposed development scheme will achieve an example of the continuation and integration of government facilities within the natural and historical landscape of North Head.
- The urban design merits of the proposal meets the objectives of the relevant planning instruments and policies, particularly in respect to the coastal design and amenity.
- The building is capable of achieving a high standard of ESD with particular focus on conservation of fauna; and heritage conservation.
- Relevant technical reports have been submitted with this EA demonstrating that potential impacts associated with traffic; flora and fauna; and other environmental considerations have been considered and are acceptable.
- The proposal will not detrimentally impact upon 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 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 to avoid long term impacts on the Little Penguin and Long-nosed Bandicoot populations on site.
- The overall outcome for the Long-nosed Bandicoot on site would be maintained, or marginally improved, by the inclusion of landscaped refuge areas and the construction of raised accommodation blocks walkways.
- The overall outcome for the Little Penguin on site would be maintained through the inclusion of design features which protect the nest sites, for example the rotation of Common Room away from the Little Penguin nests sites.

