

**Headland Preservation Group Inc.**  
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**Suggestions for Submissions under EPBC and SHFT Acts combined on proposed residential aged care facility - Middle Head, Mosman**

***we recommend by Friday August 1 by 5pm***

**Significant Adverse Impacts**

**General Guidelines for letter writing**

- These are the main issues of significance we have identified under the Acts
- However, you may think of additional significant issues
- The assessments of the proposal will deal with the worthiness/merit of the proposal
- Process issues are less relevant
- Use your own words unemotionally and objectively
- Please identify any errors and omissions in proposal documents which can be found at <http://www.harbourtrust.gov.au/node/1063>
- for more details please see [www.hpg.org.au](http://www.hpg.org.au) as at 5pm Friday July 18

**Preamble**

The Sydney Harbour Federation Trust (SHFT) was set up in 2001 to turn surplus military land into “...a lasting legacy for the people of Australia by helping to create one of the finest foreshore parks in the world and provide places that will greatly enrich the cultural life of the city and the nation.” **(SHFT Comprehensive Plan, 2003, Summary page 5)**

The Middle Head Precinct would be a “place where the area’s rich natural and cultural heritage, including its early aboriginal and military occupation will be protected and interpreted” and “to conserve and interpret the whole area as a historic precinct”; and “to provide opportunities and site interpretation for visitors to understand and appreciate the totality of the Site’s heritage.” **(SHFT Middle Head Management Plan 2007, page 5)**

**Arguments Against the Proposal (generally in priority order)**

**1. Loss of public access to land and buildings/parkland**

- The site is in the middle of a dedicated Federation parkland and heritage area which was **set aside in perpetuity for all Australians**, not just a few for their private residence.
- This was at the urging of Tony Abbott by the Howard Government as a 100 year commemoration of Federation.
- The Sydney Harbour Federation Trust Act 2001 states “The Parliament intends to conserve and preserve land....for the benefit of present and future generations of Australians”.
- The proposal is UNJUST on social and intergenerational equity considerations. It is basically a de-facto sale of public land for private residential development.
- This land and buildings should be preserved for all Australians and our children.
- The proposal would set a dangerous precedent to privatise other Australian public parkland.

- The Trust was established to prevent “ad-hoc” development (John Howard, 1998)
- The public is now free to walk between all the individual buildings of 10 Terminal complex.
- This proposal only has 1 token path through it.
- Alternatively, using the buildings for a **cultural interpretation centre is a far more worthy public purpose** in the last unrestored heritage buildings in Headland Park.

## 2. Loss of social aspects

- The proposal would have no social value except to a very few residents at the expense of all Australians present and future to whom this land was dedicated in perpetuity.
- By contrast, the reuse of these buildings for a cultural interpretation centre will create an opportunity for lasting and enduring real social values.
  - It would unite and integrate all who have had a significant interest in the park - military, indigenous, National Parks, marine studies, ASOPA, education, tourism
  - It would be a reconciliation centre with real and enduring social values.

## 3. Loss of heritage - military and indigenous

- 10 Terminal is the last built evidence of 200 years of military presence on Middle Head.
- The proposal would involve the irreversible demolition of a very significant part of the military 10 Terminal **heritage buildings**.
- The 10 Terminal buildings are on the Commonwealth Heritage List.
- The Trust’s Conservation Management Plan Vol. 1 page 181 states “10 Terminal was probably the only permanent school of military engineering erected during WW2 and as such is extremely rare”.
- The words “original” and “exceptional” appear many times in this Conservation Plan, Volume 2 Inventory Sheets 5 and 7, which relate to 10 Terminal.
- These buildings were very important in - WW2, then also for intelligence, Cold War, Korean War, Vietnam War and as a headquarters transport unit RAASC/RACT.
- Aboriginal people have inhabited this headland for 40,000 years.
- Possible loss of indigenous heritage - no proper indigenous survey has been carried out but the site was probably part of King Bungaree’s Farm, as the first indigenous land grant - map from Florence’s Trigonometric Survey of Port Jackson 1828.
- A cultural interpretation centre would be a place in which the public could appreciate Australia’s history, environment and heritage.

## 4. Risk of bushfire

- 10 Terminal is in an isolated bushfire-prone area (Bushfire-prone land map Mosman Council)
- Based on precedents, the proposal would be unlikely to be approved under NSW law
- The site is at the end of a single access, narrow, dead-end road with bush on both sides and would pose difficulty for traffic in both directions in a smoke-filled environment.
- Elderly residents are more affected by smoke.
- Resident evacuation would be extremely difficult as many would likely be immobile, some with dementia.

## 5. Alteration of Natural Landscape

- The proposal would have significant impacts on the NATURAL landscape.
- The proposed buildings would have a substantially larger footprint on the ground.

- Proposed landscaping would be all artificial and existing natural parkland would be replaced by manicured gardens.
- The proposal requires a 150 metre-long earth berm (wall) rising to 3.1 metres high along the adjoining NSW Sydney Harbour National Park.
- Unlike the existing buildings, the proposed buildings would have a substantial visible profile against the skyline from the Harbour both day and night above the tree-line.
- The proposal calls for a new parking lot on eastern side over present green space.

## **6. Traffic and Parking**

- The proposal would increase the demand for car-parking thereby reducing the available public spaces.
- Public transport is limited
- More daily traffic will be generated to service this complex.
- The proposal calls for a new parking lot on eastern side over present green space.
- Middle Head Road at the 10 Terminal site is a narrow, 5.4 metres wide is virtually single lane road used mostly by pedestrians, bushwalkers, and cyclists.
- The proposal will preclude implementation of the present Middle Head Management Plan to increase green space.

## **7. Loss of Aesthetics**

- The 10 Terminal buildings are single storey with natural light in every room.
- The proposed development is a 2-storey structure totally out of keeping with the scale and bulk of the other, single-storey buildings on the headland.
- The location of 10 Terminal immediately above the 1801 Governor King Fort. They aesthetically bookend the first and last built military heritage of 200 years on this headland.

## **8. Negative Economic Impact**

- The economic benefits of the proposal are unquantified.
- There is no publicly available feasibility study by which to assess the proposal.
- Jobs and purported economic benefits would still be created if the proposal were relocated.
- There is unlimited potential in the Headland Park and Middle Head in particular for experiential tourism, adventures, tours and education.
- Middle Head is a unique “indoor-outdoor” classroom opportunity for all Australians.
- Much of the history of Middle Head is compulsory in the new National History Curriculum which has been rolled out.
- 10 Terminal has the potential to be the focal point in this tourism/education vision.
- **Approval of this proposal would preclude these opportunity ever being explored.**

## **9. In-transparent Process**

- Public consultation has been extremely limited.
- Opposition to the proposal is widespread.
- It includes among others The National Trust NSW, Mosman Council, Mosman Parks and Bushland, Better Planning Network (affiliated with more than 420 community groups across NSW).

