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EPBC Act Submission – Proposed Residential Aged Care Facility  
Ms Teelia Peploe  
Middle Head Healthcare Pty Ltd  
PO Box 402,  
Cremorne Junction, NSW, 2090

by email: [thecovemiddlehead@gmail.com](mailto:thecovemiddlehead@gmail.com)

Dear Ms Peploe,

### **PROPOSED RESIDENTIAL AGED CARE FACILITY, MIDDLE HEAD, MOSMAN**

Thank you for the opportunity to comment on this proposal. I provide this letter as a submission on behalf of Australia ICOMOS.

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 600 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia. We have a particular interest in Australia's world heritage sites.

Australia ICOMOS notes the high standard of heritage conservation work carried out by the Sydney harbour Federation Trust and that a considerable amount of work has gone into the analysis of impacts of the proposed development. However Australia ICOMOS notes that the following issues need further careful consideration:

- The proposal for such a development is at odds with one of the main aims behind establishing the Sydney Harbour Federation Trust - to manage a publicly accessible parkland complex with compatible uses for the buildings and to prevent the headland being alienated by subdivision and residential redevelopment of the headland;
- The overall Middle Head Precinct with the adjacent National Park land with its heritage of 19th and early 20th century military is of national significance;
- The issue of the overall setting needs to be carefully considered as outlined in the Australia ICOMOS Burra Charter and its Explanatory Notes (in particular see Burra Charter Articles 1.12 and 8);
- Most of the heritage and other former defence buildings in the precinct are one storey and most have been successfully adapted without additional storeys. The development will provide an unacceptable precedent for adding additional stories as part of adaptive reuse of heritage sites at Middle Head. This development creates a two storey building over the majority of the available footprint for development with just the single storey ends of the old building retained;
- Although the impact of the second storey from the two principal elevations is negligible from the two principle short elevations, the contemporary upper levels of the two storey long side elevations will be visible from the Headland Parklands and from parts of the National Park (which has most of the 19th century fortifications including the perimeter ditch at the entrance);
- An aged care facility has to be secure and, in order to meet minimum standards, the existing buildings will require significant "modification" including substantial demolition. This would also be at odds with the past successful adaptive reuse of heritage buildings and sites which have required with minimal intervention;

- If the two storey outcome was to be approved it appears there has been insufficient land on the development site for decent plantings to screen these side views, particularly to the east.
- The carparking provisions for the new facility are inadequately landscaped to minimise impacts of parking on the significant precincts and setting. Installation of additional planting is strongly recommended to help address this issue and soften the impact of the car park. In addition it is queried whether this development is likely to lead to increased demand for additional parking that has not been adequately planned for.

Thank you again for your consideration of the views of Australia ICOMOS in this important issue.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Elizabeth Vines', written in a cursive style.

**MS ELIZABETH VINES OAM, FRAIA, MICOMOS**  
**President, Australia ICOMOS**

cc: Headland Preservation Group (HPG)