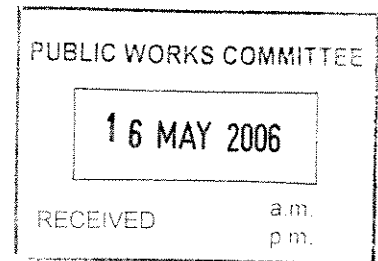


(ALSO EMAILED.)

Submission to Joint Standing Committee on Public Works.

Submission (7 pages) by:

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Proposed expansion of facilities of Australian Institute of Police Management (AIPM) and Charles Sturt University, at North Head, Manly, NSW.

Federal Health Minister and local MP Tony Abbott on Friday 12 May 2006:

"This (the listing of North Head on the National Heritage List) adds a level of protection to the whole of North Head, including contested sites like the Quarantine Station, that has never been available before and that's why I think it is so important".

"...this beautiful, magnificent, priceless, environmental and heritage treasure".

"Heritage listing is especially important and timely given the State Government's refusal to agree to the Sydney Harbour Federation Trust's plan to protect former defence lands on North Head".

Summary of submission

The proposed expansion of the AIPM facilities at the now-Heritage listed North Head is highly inappropriate in such a sensitive and heritage value area (a penguin Critical Habitat area) and a highly improper use of the land. The expansion will have significant impacts on the site and surrounding National Park land and on other matters such as the level of local traffic. Visual impact will be major.

It is driven by a commercial motive, with AIPM management stating clearly that the extra accommodation and teaching facilities are "needed" because of "increased demand" for management training for police means the AIPM capacity to run courses for non-police groups (for which it charges) will be lessened, and its commercial revenue lessened ("as demand goes up, our capacity to gain revenue from the site goes down" – Jim Hann, Executive Director, AIPM, 5 April, 2006). In addition, the site is used also by Charles Sturt University, in an arrangement with AIPM, and the extra accommodation/facility is clearly to be used for its course work – again a commercial motive for AIPM and clearly outside the intent of the agreement under which AIPM still occupies the site. If CSU was not involved, capacity would obviously be greater for police training and the alleged need for more facilities/accommodation would be even smaller. (Figures showing days for police courses and days for other courses need to take into account that non-police personnel and police personnel often do course work together).

The expansion is clearly unnecessary from a police operational point of view –

- there are now other facilities for police management training and many other alternative sites for such facilities when needed;
- there is ample accommodation already available in the area for any attendees (easily brought in by bus or walking, from the road up the hill);
- the expansion is for commercial, not police training, purposes –
- it is not necessary for any police training above what is already being carried out, as it is would be built to accommodate and service other attendees, and the improper, non-police, Charles Sturt University use of the facilities.

The AIPM claim that its long-term goal is to get commercial activity off the site is disingenuous and at odds with many aspects of its proposal and its stated reasons for the expansion.

As well, there is still much uncertainty about the exact nature of the land tenure/ownership/lease agreements. It is still NSW land, and meant to be used by the Commonwealth only for certain specific purposes.

AIPM reasons for the expansion include: it's a beautiful site and "magic spot"; it is a police tradition (generational) to be trained there; the site attracts high-profile people and future business by word-of-mouth; the Commonwealth chooses to stay there. These are all spurious or irrelevant to the discussion about appropriateness of the expansion proposal.

There are serious concerns regarding

- the magnitude and nature of the proposed expansion,
- the governmental process for addressing and deciding upon the proposal, and
- the inadequate level and system of public consultation.

In short, there seems to be little procedural scrutiny of the proposed expansion, and even less justification for it.

(See below for specific comments in regard to some specific paragraphs in AIPM "statement of evidence".)

Background on land tenure

- On 6th October 1910, the State and Commonwealth entered into an agreement whereby NSW agreed to transfer to the Commonwealth 670 acres for the purpose of quarantine.
- This transfer was made on two conditions, the main being that in the event of quarantine being removed from the subject site, the Commonwealth was to re-transfer the property to NSW except for those portions that were required by the Government.
- In 1979 the Commonwealth surrendered and relinquished all its right, title and interest in the Crown lands at North Head with the exception of the School of Artillery, Quarantine Station and the AIPM site.

- The Quarantine Station was handed back to the state in 1984. The School of Artillery and the AIPM remains "with the Commonwealth".
- From the NSW Government investigations it appears that the title of the land is still with NSW not the Commonwealth.
- A caveat on the 1979 Agreement is that the Australian Government is required to obtain the consent of the State Government to any significant expenditure on the site.

Charles Sturt University

In September 2004 Charles Sturt University announced:

"Australian Graduate School of Policing (AGSP) based in Manly, NSW has welcomed the Federal Coalition's promise of \$11.2 million announced during the Federal election campaign. The Prime Minister John Howard has stated that, if the Coalition wins the October poll, facilities at the Australian Institute of Police Management (AIPM) at Manly, Sydney will be upgraded. The AGSP is co-located with the AIPM on the Collins Beach Road site".

Not only is the involvement of CSU and the "AGSP" spurious and unclear, it should also be noted at this point that it is stated AFP policy to consolidate its leases and property holdings.

Current situation

There has been very little public consultation in regard to proposed expansion. There has been virtually no notice given to the general and local community by AIPM in regard to the specific plans for the site, and no meetings called for the general community to hear of and discuss the proposals.

There is a body of opinion that the land should be properly handed back to the State Government for control and all decision-making, as this site and the Artillery School were proposed to be handed back to the State when they were no longer used primarily for 'defence' purposes or could be relocated (there are now several other, new police training locations) .

There is even a suggestion the land may still rest not only with the NSW Government, but with NSW NPWS.

So it would appear the two options are for the site to be either (a) handed back totally to the State or (b) subject to the full application of State planning and proper scrutiny, processes, public consultation and full evaluation of the proposal and alleged need to expand.

Discussion points/ concerns

Process.

Why hasn't the rigorous process, with Conservation Management Plans, etc, applied to the Quarantine site been applied to this site? It is in the heart of the Little Penguin colony (the immediate area is a designated critical habitat for penguins) and a special NPWS/

endangered species zone, and any such expansion and redevelopment seems highly inappropriate for such a site. The immediate area is already under pressure on several environmental fronts, including the Q. Station Development, the St.Patrick's Estate housing development; and environmental effects of boats in Spring Cove

Necessity?

It has been argued variously that (a) the expansion is needed for the facility to adequately deal with training demands and (b) the new facilities would only be used 'commercially' when they were not needed for police training. It appears that currently the site is only used for police training for about 50 per cent of the time, so the "police training" demand is simply not there for an expansion and that with the new facilities increasing demand more for the non-police/services - commercial – uses, then the amount of time the centre is used for the "vital" police training would actually drop to well below 50%. It would primarily be a revenue-raising – through conferences, courses and accommodation - venue for AIPM. This is highly inappropriate use of such land.

It cannot be argued that the AIPM facility is currently used to "capacity" – or anywhere near it - for Police or emergency services training - so there is no argument that it needs to be expanded to properly fulfill its role as a police or emergency services training centre, or indeed, that it is vital to the overall training effort. The AIPM management says the police demands on its facilities are increasing, so its capacity to make money outside those demands – from corporates, etc – is decreasing, and it needs the new accommodation and extra facilities to run extra, simultaneous courses. In other words, the expansion is for commercial purposes.

Besides, there are now some new police training facilities in several other places – including Canberra - which are custom-built and adequately fulfill any need - perceived or real – for extra facilities in regard to police training, including for anti-terror training.

Inappropriate use.

This would appear to be a blatantly commercial development, from which AIPM intends to raise more revenue externally – from non-police training sources and from completely separate arrangements in regard to conventions, management training courses, accommodation, etc – uses well outside the intended use of the site under Cwith-State arrangements.

This intended expansion and commercial use is even more incompatible and inappropriate for the site when the soon-to-be-constructed redevelopment by Mawland of the Quarantine Station takes place and begins operating, in the same sector.

Jim Hann, of the AIPM, has said: "you can't let government land lie idle when it can generate income and subsidize our courses". (Also see accommodation point below)

Inadequate public consultation

It was only after much questioning in the local "co-ordination committee" in Manly last year that it was revealed that AIPM was not intending to go the community for consultations until after a draft decision was made by Canberra, and only then for a four

week period which may include a public meeting in Manly. There has been no further word on this.

Fire hazard

AIPM has been claiming the site is not in a high hazard Bushfire zone, so it doesn't need a full "asset protection zone" (buffer). This claim would appear to be false. The bushfire hazards map on the Council website (Planning – DCPS section) appears to show the site squarely in the high hazard area, and therefore necessitating the asset protection zone to be factored in to any planning. The current plans for the expansion appear to show that much of the proposed fire protection zone is in fact outside the AIPM site ("on the other side of the fence"), which appears to be against the regulations and normal procedures.

Accommodation.

There is concern over the proposal to build 30 rooms for accommodation, when the present facility is not fully used for about 50% of the time anyway. This is clearly for commercial, conference-type events. There is more than adequate accommodation nearby in Manly. It is not necessary to build extra, highly visible accommodation. Moreover, there are commercial implications for Mawland and for local accommodation businesses).

Buildings

AIPM has claimed the new, three-storey building will be well set-back from the shoreline, but is now saying, for promotional purposes, it will have fantastic views across the Harbour" – indicating it will be extremely and inappropriately visible from the Harbour. There are heritage buildings – Quarantine Station buildings – on the site, but AIPM says only the "Spring Cove Hut" and one other will remain, as heritage statements.

It would seem to be totally inappropriate to be building new buildings, and knocking down others, including heritage buildings, when the question of land tenure is still being resolved.

The expansion plans and drawings show that from two sides (south west and north-west) the proposed buildings will have a major visual impact. From the south-west – Sydney Harbour – they will appear as a huge block (with two very high roof levels) as high, for the most part, as the very thin, "tower" at the top of, and well above the roof level of, the only present building anywhere near that height.

As well, the proposed new set of buildings has a much bigger footprint on the site than those presently there, affecting endangered bandicoots, visual impact, waste management, run-off, and other factors.

Car park and traffic

The expansion proposal includes the building of a major – perhaps nearly fifty spaces - car park at the rear (the location of several prominent, major rock formations). With the number of staff, regular bus runs, and many "visiting fellows" not there every day, there

seems little need for the construction of such a major car park and resultant damage and adverse visual effect.

The expansion will increase traffic to and from the facility (along NPWS road part of the way). Even if AIPM claims are correct that most attendees won't have their own cars (so why the need for new car park), they have to get to and from there somehow.

Some comments on some specific paragraphs in AIPM "statement of Evidence".

Page 1. Paragraph 1.

This omits the fact that the site is used, for commercial purposes, to provide course work for other agencies and other entities (including commercial entities) with nothing to do with police work. E.g. Rail; Corp, CSU course attendees, etc.

Page 2, Paragraph 9:

It is clear that the AGSP involvement (a commercial involvement for AIPM benefit) is inappropriate for the site and is itself putting pressure on facilities and capacity of the site. Why is it there, especially as students are enrolled in "distant education programs"?

Page 2. Paragraph 12.

"The residential accommodation is substandard..." – relative to what?

And the expansion is not needed to correct any "operational inefficiencies in the layout and functionality".

Page 3, Paragraph 18:

This says existing facilities are inadequate to satisfy increasing demand. This is not true. Their (AIPM) statements show clearly that the site is not running anywhere near at full capacity, and that POLICE MANAGEMENT TRAINING – the proper use of the site – can expand markedly before there is any pressure on capacity. As stated before, the expansion is clearly to enable AIPM and Charles Sturt University to sell more courses and gain more commercial revenue from the site.

Also, if there was such pressure on capacity, what are the non-police courses and the Charles Sturt University students doing there? As well, there are other institutions/sites available for police management training.

Page 3, Paragraph 19.

Spurious comment. "Strong police connection"? Not as strong as the heritage connection – buildings, etc – and the natural connection. And the cost of a move to, say, Chowder bay facilities (existing) on the Harbour would be nowhere near as costly as this expansion.

Page 11. Paragraph 45.

How can it be possibly be that “building forms and materials have been proposed that draw upon the historic development of the site, are able to adapt to changing needs over time and are environmentally sound”? This simply does not make sense, and is an attempt to discuss the fact that the proposed expansion will have a significant visual and physical impact and in no way be compatible with the natural heritage and built heritage values of the site.

Page 14. Paragraph 58.

This believe it or not, actually says there is a noise impact on the AIPM site from the manly Hospital and ferry and boating movements! What is the point? And evidence?

Page 17. Paragraphs 71 and 73

The proposed fire plan, including the SFPZ would appear to be odds with regulations and requirements. It would appear from the proposal drawings that a significant part of the SFPZ is in fact on National Park land, clearly against the intent of the regulation, the interests of the National Park, and, indeed, perhaps the NSW NPWS regulations. Also, it is unclear as to whether the proposed SFPZ is in fact wide enough to comply with regulations. This would not be surprising, as the AIPM has constantly argued it did not have to provide a significant SFPZ.

Page 19, Paragraph 79.

What evidence is there that construction would generate further job opportunities from these sources?

Page 19, Paragraph 85.

More local employment opportunities would be created if any extra accommodation, when needed by the AIPM, was in the form of existing local accommodation services and buildings.

Page 21. Paragraph 93:

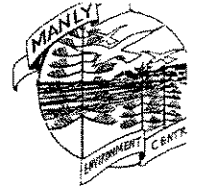
How has the proposed redevelopment been designed to **prevent** impacts on penguin and bandicoot populations? This is a preposterous claim – it simply cannot prevent such impact.

Page 21, Paragraph 95.

This is clearly at odds with the drawings and plans – how can the extra buildings and other facilities increase the open foraging areas for bandicoots? The nearby St. Patrick’s estate redevelopment has already removed much of the bandicoot habitat, and the AIPM expansion would put further pressure on the population.

Page 22 , Paragraph 101.

This makes it plain that the reason the Commonwealth was given use of the land was “executive training for Commonwealth police officers”. Its present use and clientele goes far beyond that, and is no reason for expansion of the facilities.



View www.aph.gov.au/house/committee/pwc/police/index.htm
**Commonwealth Funded \$16 Million redevelopment of Australian Institute of
Police Management
on Heritage Listed North Head.**

North Head Heritage listing includes the AIPM site

Tony Abbot MHR stated in his press release "Heritage Listing is especially important and timely given the State Government's refusal to agree to the Sydney Harbour Federation Trust's plan to protect former Defence lands on North Head." The AIPM submission states that there are no World Heritage properties listed within 10 km of the site without stating that North Head is Heritage Listed.

Historical Significance

The foreshore of the site is the subject of the historic (1790) painting depicting the first encounter between local Aboriginals and members of the first fleet. The first marine species in Australia were painted in 1937 by one of the first doctors at Quarantine Station, Dr James Stuart. The paintings are held in the Archives of The State Library.

\$16million of Federal Funding for redevelopment for AIPM

The AIPM states that it occupies a small 1.7 ha sensitive parcel of harbour side land at the end of Collins Beach Road Manly NSW. This understates the significance of the site. The 200 sqm plus 35 sqm outdoor decked area "Senior Common Room" proposed will be located between the foreshore and one of the 3 storey residential accommodation blocks on the currently undeveloped North West edge of the harbour foreshore. The development consists of 2 and 3 storey buildings highly visible from the many vantage points on the harbour.

Land Tenure needs to be Clarified

The Land Exchange Agreement of 1979 acknowledged that the Commonwealth was permitted to continue to use the AIPM site as a "Police College" until it became surplus to Commonwealth Requirements. Manly Council is seeking clarification of ongoing Commonwealth occupation of NSW Crown Land.

What is the Australian Institute of Police Management?

The AIPM is administered by the Australian Federal Police (AFP). The AIPM advertises its facilities as a conference centre and is one of four conference venues advertised on the Manly tourism website. "This facility is designed to provide an appropriate environment for the delivery of educational and business activities."

Police College, Residential Conference Centre, University Campus.

The proposal includes "55 rooms, each with a queen sized bed and ensuite together with five flexible modular spaces including kitchenette and separate bedroom to cater for multiple occupancy needs."

Harbour Front "Senior Common Room" over 200 sqm plus 25 sqm outdoor deck area

"This new facility includes a large lounge space, self serve bar & food servery, a TV lounge, storage and toilet facilities." The AIPM proposal claims "The open deck entertaining areas will be limited to daytime and early evening use. The AIPM does not operate late night entertainment that may generate noise affecting residents on the North side of Spring Cove."

60% increase in floor area

The plans show demolition of redundant buildings and replaces them with buildings more than twice the floor space, locating them on the previously undeveloped North West area of the site. This is not compatible with the scale of the historic buildings on site.

Endangered Penguin Colony

35 sq metres of open deck and entertaining area is 25 metres from the highest concentration of the threatened little penguin colony. The number of breeding penguins in the Manly Colony is less than 50 pairs.

Aquatic Reserve Department of Heritage & Environment listed Category VI

This redevelopment will occur on the shores of Sydney Harbour's only Aquatic Reserve of National significance. Spring Cove contains habitat for threatened marine species and some of the largest remaining sensitive seagrass beds in Sydney Harbour.

Significant reduction in habitat of the endangered longnosed bandicoot.

Bandicoots and penguins are sensitive to light, noise and disturbance, 26 months of construction as well as the increased activities of up to 110 visitors accommodated on the site will affect these endangered animals.

Asset Protection Zone compromise

A significant portion of the Asset Protection Zone, which will require clearing of bushland, appears to be on National Parks land and not the AIPM site contrary to Bushfire Protection Standards 2001 guidelines. Clearing of bushland will be required on the AIPM site as well.

Endangered red crown toadlet habitat ignored

The design ignores the fact that a watercourse runs through the site with potential to restore the geo and biodiversity of the "mostly modified and built-out site" Reconstituting the creek that is currently piped through the site could provide habitat for the endangered red crown toadlet.

50% increase in paved surfaces for roads & carparking

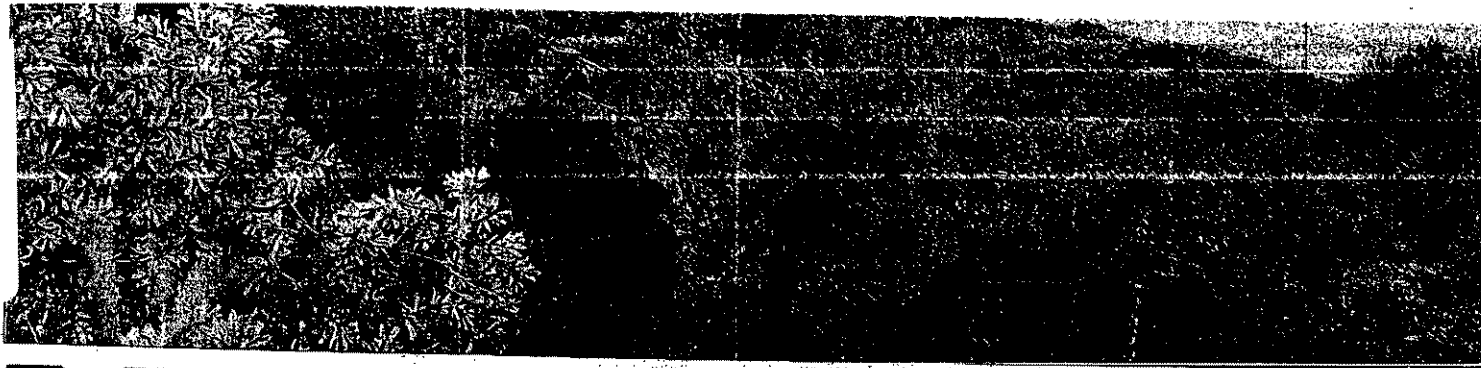
The AIPM proposal includes new roadways & a carpark approximately 1400m² in area. This reduces the bandicoot foraging areas. This is an unacceptable urban hard-paved scar in the landscape up against the pristine bush of the Spring Cove precinct.

Cumulative Effects of increased traffic

Darley Road, the only access road to North Head is already carrying traffic significantly over its capacity. The AIPM will not only attract traffic from the course attendees and staff but there will also be increase in logistic traffic required to service the new development.

Potential increase in production of waste

Waste Management, including removal of domestic and other industrial waste associated with running a residential conference centre, as well as sewerage on this sensitive site is of great concern. At the time of the Quarantine Station development proposal Sydney Water stated that there was insufficient sewer mains capacity to deal with increased flows.



A police spokesman said the driver had gone to the rear of his vehicle to load an excavator when the truck began rolling down the street.

The police, fire brigade and the RTA attended the scene before the truck was removed by crane.

Police will inspect the vehicle for mechanical failure.

Picture: MARTIN LANGE

North Head plea

LISA MUXWORTHY
political reporter

THERE is increasing pressure for the state and federal governments to collaborate on the future of North Head now the area has been placed on the National Heritage list.

Yesterday environmentalists, action groups and a local MP all called on both levels of government to work together and protect the area.

This came after federal Health Minister and Warringah MP Tony Abbott announced that North

Head was the 29th site to gain the status of heritage listing.

This means the former artillery school, the artillery museum, the police college, the Quarantine Station and the North Head sections of Sydney Harbour National Park are all protected.

No development can take place on heritage-listed land without approval from the federal Environment Minister, currently Ian Campbell. Mr Abbott said for Manly residents there was nothing more important than the protection of "this beautiful, magnifi-

cent, priceless, environmental and heritage treasure". "This adds a level of protection to the whole of North Head, including contested sites like the Quarantine Station, that have never been available before and that's why I think it's so important," he said.

■ To Page 2

MPs CLASH OVER BROGDEN COMMENTS - Page 7



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NEWS

New North Head plea

■ From Page 1

Manly MP David Barr joined Mr Abbott at North Head yesterday morning for the heritage announcement.

Mr Barr has pressed the State Government to back away from the proposed 45-year lease of the Quarantine Station.

But hotel developer Mawland and the State Government have confirmed neither are in a position to opt out of the deal.

Mawland is negotiating with other financial backers after losing its financial partner, Babcock and Brown, recently. The developer was unavailable for comment yesterday.

Mr Barr said the Federal Government was "doing the right thing for North Head, unlike what the State Government has been doing with the Quarantine Station".

"What we need is for this site to be under the care and control of a state body and not a private hotel operator, as is the case for the Quarantine Station," he said.

North Head Sanctuary Foundation president Judy Lambert was delighted with the heritage protection.



Tony Abbott

"When you look around, it (North Head) is one entity and we need it to be managed as one entity," she said.

"That hasn't been happening. There has been the usual

Commonwealth-state argy-bargy and we're hopeful the increased power to the federal Environment Minister can help to negotiate a way through that."

The announcement was well received, with support from Defenders of Sydney Harbour Foreshores and the National Parks Association of NSW.

Phil Jenkin from Defenders said "the time had come for the State Government to drop its proposal to commercially lease the Quarantine Station to the private sector... and sit down with the Commonwealth and other stakeholders and agree on a plan of management for the whole of North Head"



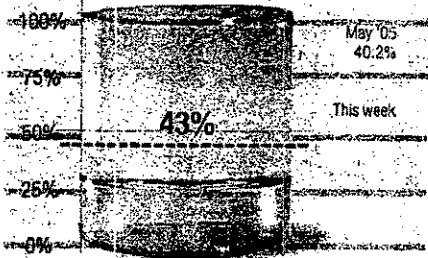
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Water Stage-four restrictions reviewed 30%

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Tomorrow

Fine day.
Chance late
shower.
Top: 22C



Monday

Early shower
then fine.
Top: 21C

Sunrise/set:
6.38/5.04
Moonrise/set:
4.44pm/6.23am
Low tide:
0.39m-2.17am
0.45m-1.49pm
High tide:
1.35m-8.06am
1.76m-8.20pm
Water temp:
20.2C

as Forest, Davidson, Belrose, Frenchs Forest, Forestville, Killarney Heights, North Balgowlah, Fairlight, Manly, Harbord, Queenscliff, Collaroy, Collaroy Inner, North Curl Curl, Brookvale, Allambie Heights, North Manly, Beacon-hill, Mona Vale, Bayview, Church Point, Newport, Avalon, Bilgola, Clareville, Whale Newspaper Group, a division of Nationwide News Pty Ltd. ABN 98 008 438 828 Quarrie St, Parramatta, NSW 2150

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