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Manly  
NSW 2095  
17<sup>th</sup> May 2006

Parliamentary Standing Committee on Public Works  
Parliament House  
Canberra  
ACT

**Re: Submission in relation to Australian Institute of Police Management,  
North Head, Manly, NSW**

**North Head Heritage listing includes the Australian Institute of Police Management 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 itself is Heritage Listed.

The AIPM states that it occupies a small 1.7 ha parcel of harbour side land at the end of Collins Beach Road Manly NSW. This understates the significance of the site which is adjacent to the former Quarantine Station and part of North Head.

The 200 square metre Function Centre with a 25 square metre open deck, cleverly disguised as the “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 Exchange Agreement 1979.**

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.

### **Identification of the Need**

The AIPM is administered by the Australian Federal Police (AFP). The AIPM advertises its facilities as a conference centre and is one of a number of conference venues advertised on a Manly tourism website. The AIPM proposal states that “This facility is designed to provide an appropriate environment for the delivery of educational and business activities.” – No mention of Policing Courses

In 2006 the AIPM can no longer claim to be a “Police College”. The Charles Sturt University Arts Faculty (which refers to the “Manly Campus” on its website) is collocated with the AIPM delivering postgraduate distance education programmes. These are only two of many providers of specialist “policing, leadership and management courses” in Australia. Others include but are not limited to the Macquarie University Centre for Policing, Intelligence & Counter Terrorism, University of Western Sydney Bachelor of Policing, University of Tasmania Grad Dip in Police Studies, The AFP Police College in Barton Canberra. There are also many private accredited providers of leadership training courses.

The AIPM delivers generic professional development training course for the Victorian based AFAC which is sponsored by private companies, Dulux and Bunnings. The success of these courses is not contingent on them being delivered at the current AIPM site.

It is interesting to note in the AFP 2004/2005 annual report it was reported that as part of AFP new manager development strategy. Leadership and Management Development (LMD) delivered team leader and SES induction courses in Sydney, Melbourne & Canberra by a contracted provider not named but not AIPM.

Recently staff from the AIPM delivered courses off-site in the Solomon Islands obviating the need to accommodate large numbers of students at the North Head site.

Prior to the establishment of the Australian Command and Staff College in 2001 middle management officer Command and Staff training was conducted at separate single Service staff colleges. The Army Command and Staff course was conducted at Fort Queenscliff in Victoria, the RAAF Staff Course at RAAF Fairbairn in the ACT and the RAN Staff Course at HMAS PENGUIN in Sydney NSW. The collocation of the three previous Single Service Colleges provided a comprehensive military education within a collaborative joint environment. AFP personnel can attend this college for senior management training.

Similarly Military personnel attend the AIPM as “visiting fellows” in its splendid isolation for 12 to 18 months.

There are numerous other AFP training institutions already located in and close to Canberra.

The AIPM seems intent on not following the trend set by these Commonwealth agencies to move to Canberra where resources can be shared and integrated.

### **Police College, Residential Conference Centre, University Campus or Resort?**

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.”

It should be noted that the ACSC referred to above at which 180 students attend does not offer on-site accommodation for its students.

The AIPM 2004/05 annual report recorded between 24 and 31 enrolments for each of its residential courses. Course attendees not able to be accommodated on-site have been successfully accommodated in appropriate venues in Manly.

### **Harbourside Function Centre Room over 200 sq metres including 35 metre open deck area.**

The AIPM proposal describes “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.” The AIPM function centre will not be regulated by any State or Local Government Licensing laws. There is no mention of the local residents, existing and future on “Eastern Hill” which is directly opposite and west of the site. These residents will have no recourse if noise levels exceed acceptable levels or the functions occur at unacceptable times.

### **Endangered Penguin Colony**

The AIPM proposal states that “a primary design principle involves the removal of existing residential blocks, which are in poor state of repair and have been assessed as having minimal heritage value. The consequence of their removal is increased separation between the AIPM facilities and the Little Penguin breeding nests, and an enlarged grazing area for the long nosed bandicoots. The new residential accommodation would be located at the rear of the site, in the South west corner. “

This fails to acknowledge that the new “senior common room” is to be built between the foreshore and the accommodation blocks and will in fact be built on previously undeveloped land, currently bandicoot foraging area, with the 35sqm open deck & entertaining area less than 25 meters from the largest concentration (perhaps six or seven pairs) of Little Penguin nests in the endangered colony. The number of breeding penguins in the Manly Colony is less than 50 pairs. The Little Penguins are particularly sensitive to light and noise disturbances during their nesting season from June to March.

### **50% increase in paved surfaces for roads & carparking**

The AIPM proposal includes new roadways & a carpark approximately 1400m<sup>2</sup> in area. This reduces the bandicoot foraging areas. It is also an unacceptable urban hard-paved scar in the landscape up against the pristine bush of the Spring Cove precinct.

### **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 and the notion that ecologically sustainable building should be adaptive reuse and not demolition and building of new buildings.

### **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. The AIPM proposal does not acknowledge that, aside from the 26 months of construction, lights, noise and increased activity on the shores of this Aquatic Reserve can only have a deleterious affect on the area.

### **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 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.

### **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. The % figures comparing week day and weekend traffic into the site presented in the proposal are meaningless.

### **Infrastructure**

There is no mention in this proposal as to how the redevelopment will accommodate the increased need for mains power or the requirement for fast broadband wireless internet. The location of Mobile phone and wireless internet towers is a contentious issue in Manly.

### **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.

### **Connection to the current site**

The AIPM proposal suggests that the relocation of the facilities fails to recognize the “strong police connection to the current site since 1960”. Military personnel, in particular Army & Navy likewise had and still have strong connections stretching further back than 1960 with various harbour foreshore sites already handed back to NSW under the Land Exchange agreement 1979. Heritage Listing of North Head suggests that many more than the 6000 police who have visited the AIPM have a strong connection with the location.

### **General Impacts**

The proposal states that the “primary impacts of the proposed redevelopment on the local community include the improvement of the presentation as perceived from the residential areas on the north side”. This is the view of AIPM and not those living in the vicinity directly affected by the redevelopment of this site. In addition to suggest that this redevelopment will make a positive contribution to the management of the habitat for native flora and fauna, specifically the Little Penguin and Long nosed bandicoot is wrong, even if they survive the 26 months construction stage.

### **Community consultation**

The proposal claims to have consulted a number of authorities and organisations, including the Little Manly Precinct Community forum. Having attended the “briefing” conducted by the AIPM at the Little Manly Precinct Forum I do not consider that this was “community consultation”. Indeed the plans were displayed and explained to the 20 or so regular attendees at this forum. There was no discussion sought. The proposal was presented as a fait accomplis accompanied by a statement along the lines that this was a Commonwealth funded redevelopment on Commonwealth property and that the AIPM was being a being good corporate citizen in showing the community the plans as the AIPM was not subject to local or State Government planning requirements and approvals.

Thank you for this opportunity to make a submission regarding this redevelopment on this sensitive site on Heritage listed North head.

Yours Faithfully

Cathy Griffin