

Gap Bluff – Reuse of Buildings - Response to Public Submissions – REVISED EXHIBITION DRAFT

Number of submissions: 150

For: 1

Against: 149

Number of times raised in Submissions	Item Raised	Proponent's Response
In support		
1	We approve of the proposal as published. The area needs catering facilities of this nature.	Noted. The revised proposal will continue to provide function facilities, however on a smaller scale than originally proposed.
1	I have little issue with the conversion and upgrading the buildings for the purpose of short term accommodation. This use allows the enjoyment of the area to others. However, I do have concerns with the café and restaurant.	Noted. The café and restaurant at Constables Cottage is no longer proposed. This building will now also be adaptively reused for short-term accommodation.
1	We are thrilled to the buildings, beaches and parks for public access in terms of restaurants, particularly the Camp Cove Beaches.	Noted.
Petitions		
1	We are sad to see yet another petition in the local shops for everyone to sign, complaining of the proposed development. The local residents seem to always be interested in their own investment only and the private use of public street parking around it.	Noted.
1	2,640 people have signed the online petition on change.org for 'Save Watsons Bay from overdevelopment'. Over 920 people have left comments. The main concerns and comments included the following: <ul style="list-style-type: none"> the inappropriate nature of development in the area; the potential impact on traffic in the area; the potential impact on parking in the area; the potential impact on pedestrian safety as a result of increased traffic in the area; 	The majority of the issues raised in this petition have been addressed by the revised proposal. The revised proposal makes the following key changes: <ul style="list-style-type: none"> Deletion of the proposed second floor level of the Armoury; Changing the use of Constables Cottage from a café/restaurant to short-stay accommodation; Provision of sufficient on-site parking to accommodate all guest and staff parking requirements;

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	<ul style="list-style-type: none"> the potential impact on noise in the area as a result of the proposal; the appreciation of the beautiful, serene and unspoiled area; concern for overdevelopment; the sentimental value of the area; concern about the commercialisation of the area; the need to preserve and conserve the area; the desire to keep the site as public open space; the area already has several function centres in the area; concern about an increase in people in the area; the importance of recognising the historical significance of the area; the ecological impact on the areas as a result of the proposal; and the need for the public amenity to be protected. 	<ul style="list-style-type: none"> Incorporation of additional acoustic and noise containment measures; Enabling complimentary community use of Officers Mess or Armoury on up to 10 occasions per year; Holding an annual Community Open Day to Constables Cottage, 33 Cliff Street, Green Point Cottage and Gap Bluff Cottage; and Introduction of a daily cap on patron numbers, with a maximum of 410 guests attending functions at the Gap Bluff Precinct on any one day. <p>The proposed modifications result in significant improvements to traffic, parking and noise emissions. The revised proposal seeks to balance the public interest with a commercially viable outcome which will facilitate the conservation and adaptive reuse of the site, and prevent the existing buildings from falling further into disrepair.</p>
Public Consultation		
8	The consultation undertaken was inadequate.	<p>In addition to the consultation that was undertaken prior to preparation of the original proposal, the REF was publicly exhibited between 10 August 2015 and 10 November 2015.</p> <p>During the public exhibition phase, NPWS held stakeholder meetings on 19 August 2015 and 15 October 2015.</p> <p>Since exhibition of the Review of Environmental Factors (REF), NPWS and Gap Bluff Hospitality have met with key stakeholders and community groups. This included meetings with representatives from the Watsons Bay Association in October and December 2016. A meeting was also held with Woollahra Council in February 2017 to discuss the revised proposal.</p> <p>The revised REF will also be publicly exhibited, which will give the community the opportunity to comment on the revised scheme.</p>
7	There has been no consultation on this proposal.	Refer to response above.
2	There is a need for additional and more transparent community consultation.	Refer to response above.
2	The tender process is not acceptable and does not reflect transparent and responsible decision making.	NPWS conducted a Public EOI. The proponent submitted a proposal based on

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		their assessment of the EOI and following a communal Site Inspection where all interested parties were presented the facilities at the same time. The proponent was assessed to have provided the best outcome for NPWS based on the criteria of the EOI.
2	The Expression of Interest Tender process lacked transparency and community consultation.	Refer to response above.
1	The selection panel took the proponents reports at face value without any expert peer reviews of the business case, heritage report, traffic, parking, acoustic and impact on the parkland.	Following the submission of the initial REF, the OEH has determined that assessment of the REF and revised REF will be conducted by the Regional Operations Group (ROG), at arm's length from NPWS, to ensure their assessment is scrutinised exclusively of the Agency that will ultimately benefit from the proposed activity. The ROG has commissioned independent expert peer reviews in the areas that were considered to require further scrutiny.
1	Suggestion that the Office of Heritage and Environment establish a diverse committee with representatives of the local and Aboriginal community, as well as Woollahra Council, education, arts and tourism with a view to establishing the best uses for the building.	Noted.
Residential impacts and amenity		
41	The proposal is inappropriate for the area.	As detailed throughout this Response to Submissions and revised REF, the scope of the proposed development has been reduced to ensure that any adverse impacts associated with the proposal are mitigated, and that the proposal is appropriate in the context of the locality. Key changes to the proposal include the removal of the second storey on the Armoury and the use of Constables Cottage as short-term accommodation (a continuation of the current use).
5	Concern that weddings would seriously impact on the current amenity.	As detailed throughout the revised REF, the scale and capacity of the proposal has been reduced to ensure that there are no adverse amenity impacts as a result of the proposed function use. It is noted that whilst the Armoury and Officers Mess are currently vacant, their most recent use was as functions centres. Further, the revised capacities of the venues are aligned with the previous uses and so the environmental impacts will be consistent with past approved practices.
1	Concern over air pollution as a result of the proposal.	As detailed in the REF and accompanying Construction Management Plan, measures will be put in place to ensure that there are no adverse impacts on air

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		quality during the construction phase. During operation, it is not anticipated that any of the uses would adversely impact air quality.
1	Concern about light pollution as a result of the proposal.	As noted in the REF, lighting to Constables Cottage, 33 Cliff Street, Gap Bluff Cottage and Green Point Cottage will be consistent with a residential dwelling, and will not result in any adverse amenity impacts. The Armoury and Officers Mess are proposed to be lit at night. However, lights will face downwards, not outwards, and will be as focused as possible to ensure that light spill is kept to a minimum. External lighting at night would not result in any significant adverse impacts on surrounding residences.
1	Concern that the functions will be a major disruption to both residents and visitors.	Following the comments received during the public exhibition period, the scale of the function use has been reduced and Constables Cottage will now be used as short-term accommodation. As a result, any impacts associated with the use of the buildings will be reduced, and any impacts with respect to parking, noise and access to the park can be managed to ensure no disruptions to residents and visitors.
1	The proposal will alter the laid back, casual, family atmosphere of Camp Cove Beach.	Constables Cottage is no longer proposed to be a restaurant. In response to the issues raised, Constables Cottage will now retain its existing use as short-term holiday accommodation.
Tourism		
24	Against the over commercialisation of the area.	The proposal seeks to balance the commercial needs of the proponent, with the need to maintain the character of the area. The proposal will ensure the precinct's ongoing financial viability, and in doing so, will ensure that the buildings are conserved and prevented from falling into further disrepair.
13	Concern about the increase in people to the area.	Under the revised proposal, the scale and capacity of the development has been significantly reduced. Whilst a key objective of the proposal is to enable more members of the public to enjoy the park and these historically significant buildings, the reduced scale of the development means that any environmental impacts associated with the use of the facilities can be appropriately managed.
1	Concern that the NSW National Parks and Wildlife Service would endorse a 72 seat restaurant on Camp Cove Beach.	Constables Cottage is no longer proposed to be a restaurant. In response to the issues raised, Constables Cottage will now retain its existing use as short-term

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		holiday accommodation.
Function and event capacity		
16	<p>There are currently several local venues within the Watsons Bay area that cater for functions and weddings.</p> <ul style="list-style-type: none"> • Dunbar House; • Watsons Bay Hotel; • Tea Gardens; • Vaucluse Sailing Club; • 12 Foot Sailing Club; • Doyles Upstairs function rooms; • recently developed Hall of St Peters; • The Gunyah; • Vaucluse House; and • several venues at Neilson Park. 	Noted.
2	Do not support the development of Constables Cottage into a 72 seat restaurant.	Constables Cottage is no longer proposed to be a restaurant. In response to the issues raised, Constables Cottage will now retain its existing use as short-term holiday accommodation.
1	The buildings in the Gap Bluff Precinct should be repurposed for uses that respect the local history, environment and amenity of the area.	The proposed adaptive reuse of the precinct seeks to respect the history, environment and amenity of the area. The revised proposal seeks to reduce the environmental impacts associated with the proposed development, including the deletion of the second storey addition to the Armoury. The revised capacities of the venues are aligned with the previous uses and so the environmental impacts will be consistent with past approved practices.
2	Concern that Dockside has no experience in managing culturally or environmentally significant sites and schemes.	<p>Gap Bluff Hospitality Pty Ltd is owned by Christopher Drivas, Managing Director of Dockside Group currently managing some of Sydney's prime harbour-based function centres, including the Gap Bluff Hospitality Pavilion in Darling Harbour, Campbell's Stores in The Rocks and Orso Bayside at The Spit, Mosman.</p> <p>Dockside Group has significant experience with managing function centres and restaurants, including experience with weddings, business events, special occasions and formals. Further, facilities operated by Dockside Group are located in some of the most environmentally and visually sensitive areas of the</p>

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		harbour, such as The Rocks, Middle Harbour and Darling Harbour.
1	The restaurant and café with such a capacity will destroy the local character of the area.	Constables Cottage is no longer proposed to be a restaurant. In response to the issues raised, Constables Cottage will now retain its existing use as short-term holiday accommodation.
1	Could Dockside Group please ensure that all weddings be held from Monday through to Thursday between 7am and 2.30pm.	The proposed hours of operation are consistent with the original proposal. It is impractical to expect that weddings be limited to the suggested times.
Traffic, transport, access and road safety		
41	Concern over traffic congestion as a result of the proposal.	<p>The revised proposal has been reduced in scale in order to reduce any impacts associated with traffic and parking.</p> <p>All parking (visitor and staff) required for the function centre uses can now be accommodated on site.</p> <p>In response to comments raised in submissions, a Sensitivity Test traffic analysis was carried out to assess the impacts of the function centres operating during busy peak periods. The analysis was based on surveyed data gathered on the October 2016 (Labour Day).</p> <p>As noted above, the revised capacities of the venues are consistent with the previous uses on the site, and so the environmental impacts will be consistent with past approved practices.</p>
6	Public transport services such as ferries do not have the capacity to cope with increased volumes of people.	It is proposed to prepare a Travel Access Guide for patrons and employees (Workplace Travel Plan) in order to promote alternate modes of transport and discourage private vehicle use. It is anticipated that existing public transport services will have sufficient capacity to serve those staff and patrons who choose to use public transport.
6	Concern that the increase in people will impact on public safety.	Increased use and visitation to the park is likely to increase public safety as a result of increased passive surveillance. Notwithstanding this, the Operational Plan of Management includes a range of security measures which will be implemented during the operation of the Officers Mess and Armoury.
5	The proposal would adversely impact on emergency vehicle access.	Emergency vehicle access to and from the site will be available at all times. This process would be implemented through emergency protocols on the site, which

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		would include a requirement for site personnel to assist with emergency access, as required.
4	Concern that there are not enough public transport services (bus and ferry services) currently available to service the proposal.	Refer to response above. The construction activities will have no material impact on the existing public transport services within the vicinity of the site. As noted above the proposed capacities are consistent with the previous use of the site, and all bus services will continue to operate as currently occurs.
4	The Traffic Impact Assessment was inadequate and unrealistic.	A revised Traffic Impact Assessment has been prepared to support the revised proposal. A copy of the revised Assessment is provided at Appendix B of the REF.
4	Concern about the loss of public access to the site.	<p>Public access arrangements will either remain as they currently exist, or will be improved. Specifically, public access to the land within the Gap Bluff Precinct (i.e. around the Armoury and Officers Mess) will be maintained. Further, public access to several buildings will be significantly improved – Gap Bluff Cottage and 33 Cliff Street will be available for use as short-term accommodation for the first time. Overall, the proposal will not result in any loss of public access, and in some cases will significantly improve public access to the buildings and surrounding area.</p> <p>Further, as part of the revised proposal, Gap Buff Hospitality will:</p> <ul style="list-style-type: none"> • Enable complimentary community use of Officers Mess or Armoury on up to 10 occasions per year; and • Arrange an annual Community Open Day to Constables Cottage, 33 Cliff Street, Green Point Cottage and Gap Bluff Cottage.
3	Concern that there is one road into Watsons Bay will not be able to support the increase in people.	As detailed in the REF, additional traffic modelling has been undertaken in response to the reduced scale of the proposed development. The acceptability of the proposal should be assessed against the Standard Test traffic assessment. The Standard Test traffic assessment indicates that the proposal is acceptable as it would not result in traffic volumes on the local road network exceeding RMS Guide environmental performance thresholds. Further, it is noted that the revised proposal eliminates all traffic to Camp Cove, other than the limited traffic associated with the use of the short-stay accommodation cottages.
3	Concern that the Traffic Assessment was only based on two days in	Refer to response above. Additional testing was carried out over the October

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	April. It did not acknowledge the intensity of traffic from November to February.	long weekend in 2016 to gain an understanding of peak season traffic volumes.
2	More consideration should be given to the walk ways in the area.	The proposal does not seek to alter any walkways in or around the site.
1	There is insufficient public transport infrastructure to support the proposal.	Refer to response above. The revised Traffic Impact Assessment provides timetables for public transport services.
1	The proposal will not include access to the National Park.	The proposal does not seek to make any changes to the access arrangements into the National Park.
1	The traffic generated would adversely impact upon the local road network.	Refer to response above.
1	There was no reference was made in the Traffic Impact Assessment about timetables.	<p>Gap Bluff Hospitality is committed to promoting alternate modes of transport and it is proposed to prepare a Transport Access Guide (TAG) to be made available to all function centre attendees (via email) and employees. The TAG will include up to date transport information (timetables and routes from major centres) to encourage public transport use.</p> <p>Timetables have also been provided at Appendix A of the Draft Traffic Management Plan (refer to Appendix B of the REF).</p>
1	Residents parking permits are totally ineffective.	Noted. This is outside the scope of the proposal.
1	The entrance at Cliff Street Car Park at Camp Cove, cars frequently queue, locking up Pacific Street and causing gridlock.	The proposal will not put any additional pressure on the Cliff Street Car Park. The revised proposal seeks to use Constables Cottage as short-stay accommodation, which will accommodate on-site parking for guests.
1	The Ason Group analysis was inadequate. The days chosen were the week after Easter, a relatively quiet time in Watsons Bay. A survey done on Saturdays and Sundays in late spring/summer would show no available parking between 10am and 2pm within a 2km radius of the Bay.	As part of the revised Traffic Impact Assessment, updated surveys were undertaken on the October long weekend. Refer to response above.
1	An independent survey is needed. This survey should cover more than two days, use appropriate statistical methods and not be commissioned by a company with a direct interest in the result.	Refer to response above.

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Parking		
37	Concern about the potential impact on car parking including competition for parking as a result of the proposal.	Refer to response above. As detailed in the revised REF, due to the reduced scope of the proposed activity, all parking requirements can now be accommodated on site.
5	There is limited on street parking available.	Noted. All parking (visitor and staff) required to support the revised proposal is capable of being accommodated within the site.
4	Concern that there is not enough parking on surrounding streets and hosting the car park on site will significantly impact on visitors to the park.	Refer to response above.
4	The parking numbers will need to be revised.	Refer to response above.
3	The proposal fails to provide off street car parking.	Refer to response above.
2	Concern that the streets are narrow and won't allow parking.	Refer to response above.
1	Concern that the parking studies submitted by Dockside are misleading.	Refer to response above.
1	Watsons Bay already has nine function venues with a total capacity of over 5000 quests per week. The Dockside proposal will add another 30% to this number.	Refer to response above.
1	Concern that people will park on walking track and grassy area to find parking. This will block the view and leave walkers to re-route around the back of the building so as not to intrude on the function taking place.	Overflow parking can be provided on the Gap Bluff access road to the north of the hardstand area, which heads northwards towards the access road to the naval base. The overflow parking will only be required during peak periods. In these instances, a Gap Bluff Hospitality employee will be employed to assist with pedestrian movements and ensure the one-way system for general vehicles is adhered to. However, it is anticipated that the majority of events will take place in the evening, when walkers will be less prevalent.
Statutory/strategic land use planning issues		
2	The proposal does not accord with the Sydney Harbour National Park 2012 Plan of Management or the National Parks and Wildlife Park Act 1974.	The proposal would be consistent with the objects of the Act, given the following: <ul style="list-style-type: none"> The proposal would not affect the conservation of nature, given the works are limited to renovations and refurbishments to existing buildings. Further, the footprint of the proposed works would not extend significantly beyond the existing curtilage of the buildings.

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		<ul style="list-style-type: none"> The proposal aims to respect the heritage significance of the buildings, and in the case of the Officers Mess, makes a positive contribution in terms of the reinstatement of the original flat roof. Overall, the proposal would result in the refurbishment and long-term upkeep of a number of heritage buildings. Public access arrangements will either remain as they currently exist, or will be improved. Specifically, public access to the land within the Gap Bluff Precinct (i.e. around the Armoury and Officers Mess) will be maintained. Further, public access to several buildings will be significantly improved – Gap Bluff Cottage and 33 Cliff Street will be available for use as short-term accommodation for the first time. Overall, the proposal will not result in any loss of public access, and in some cases will significantly improve public access to the buildings and surrounding area. The proposal would continue to facilitate management of the surrounding NPWS land in accordance with the <i>Sydney Harbour National Park Plan of Management 2012</i>. <p>The proposal is also consistent with the specific sections of the SHNP PoM relevant to each precinct.</p> <ul style="list-style-type: none"> The Armoury, Gap Cottage and Officers Mess form part of Precinct 03: Gap Bluff. Project 11, which sits under Precinct 03, allows for adaptive re-use of the precinct for the purpose of appropriate community and commercial uses, such as visitor and tourist accommodation, administration, or for conferences and functions. The proposed uses are consistent with these intended uses and are consistent with the management principles of the park. The PoM also identifies an area for new buildings. The proposed works to the Armoury, Gap Cottage and Officers Mess are within this area for new buildings or structures. Constables Cottage, 33 Cliff Street and Green Point Cottage form part of Precinct 02: South Head, Camp Cove and Green Point. These buildings are identified for new adaptive uses, such as accommodation.
1	Please do not allow the redevelopment of the park	The proposed development is required to prevent the buildings from falling into further disrepair, and ensure the ongoing viability of the park.
1	The notion of a wedding precinct is inconsistent with the NSW National Parks and Wildlife Services brief.	Refer to response above. The proposed uses are consistent with those identified for the precincts under the <i>Sydney Harbour National Park Plan of Management 2012</i> .

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1	The use of the buildings for short term accommodation is a good idea.	Noted. Constables Cottage is now also proposed to be used for short term accommodation.
1	The absence of Council approval is a problem.	The proposed development is going through the appropriate approval pathway. Notwithstanding that Council is not the consent authority, Council provided detailed comments on the original scheme and has been consulted during preparation of the revised proposal.
1	The proposal does not accord with the National Parks and Wildlife Park Act 1974.	Refer to response above.
1	The REF only addresses the six individual sites, the buildings and their surroundings. The broader integration between the six sites and surrounding National Park lands not the potential impacts of the proposal on the broader environment have been addressed.	The proposed design has given consideration to the siting of the buildings, and their relationship to the surrounding National Park. Many of the specialist studies, in particular the Flora and Fauna Impact Assessment has consideration potential ecological impacts outside of the six individual sites.
1	The REF falls below the standards suggested in the 'Proponents Guidelines for the Review of Environmental Factors' by the NSW Department of Environment, Climate Change and Water (2011) as the review is based on a solely preliminary investigation.	The level of investigation undertaken is appropriate for the REF submission. It is standard practice for more detailed investigations and plans to be developed prior to commencement of works.
1	The Constables Cottage is proposal is inconsistent with the Local Environmental Plan. I can't turn my house into a café so why is this allowed?	<p>The subject site is zoned as E1: National Parks and Nature Reserves. Clause 2 of Zone E1 states that the following is permitted without consent:</p> <p><i>Uses authorised under the National Parks and Wildlife Act 1974</i></p> <p>For the reasons set out under Sections 7 and 8 of the REF, the proposal is permitted without development consent and is consistent with the objectives of the E1 National Parks and Nature Reserves zone, subject to the amendments contained within the Recommendation.</p> <p>Constables Cottage is now also proposed to be used for short term accommodation.</p>
1	How is the proposal to increase the size of the Armoury Building by the addition of a second storey or the development of the Constables Cottage into a 72 seat restaurant 'adaptive reuse'.	In response to the concerns raised, Constables Cottage will now retain its existing use as short-term holiday accommodation and the second storey addition to the Armoury is no longer proposed.
1	Concern that the proposal will work against the Plan of Management for South Head. The Plan of Management 2012 for South Head, had many recommendations. The Gap Bluff Hospitality proposal focuses on one,	Refer to response above. The proposal is consistent with the <i>Sydney Harbour National Park Plan of Management 2012</i> . The matters suggested in this submission are beyond the scope of the proposal.

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	or the least important, adaptive reuse. There is no mention of the landscape trail, outdoor museum, access to the South Head Trail. Without these areas being considered holistically, the proposal is a lost opportunity for the precinct.	
1	Concern about incorrect controls for the Armoury and Officers Mess. When Woollahra Council approved functions and dining at Dunbar House, strict controls were put in place in terms of noise, transport management plans and hours of operation. The standards set are appropriate to this location, as it is in a residential/commercial precinct. Why is Gap Bluff hospitality proposal able to flout the community standard?	The proposal is not subject to the same approval pathway as the application for Dunbar House. Notwithstanding this, the proposed use has been assessed against Council requirements and the use of the function centres at Gap Bluff would be subject to the requirements and recommendations outlined in the supporting technical studies, as well as the Operational Plan of Management prepared for the site. These measures will ensure that any impacts associated with the use are managed appropriately. Further, it is noted that Woollahra Council is the appropriate regulatory authority for the site, and so any noise abatement conditions, standards and orders issued by Council must be adhered to.
	The proposal does not demonstrate exemplary adaptive reuse management of South Head, Camp Cove and Green, Point or Gap Bluff precincts because it fails to include community uses and proposed and access to the site will be restricted, not increased.	<p>Public access arrangements will either remain as they currently exist, or will be improved. Specifically, public access to the land within the Gap Bluff Precinct (i.e. around the Armoury and Officers Mess) will be maintained. Further, public access to several buildings will be significantly improved – Gap Bluff Cottage and 33 Cliff Street will be available for use as short-term accommodation for the first time. Overall, the proposal will not result in any loss of public access, and in some cases will significantly improve public access to the buildings and surrounding area.</p> <p>The revised proposal will result in significant improvements to public access by:</p> <ul style="list-style-type: none"> • Enabling complimentary community use of Officers Mess or Armoury on up to 10 occasions per year; and • Hosting an annual Community Open Day to Constables Cottage, 33 Cliff Street, Green Point Cottage and Gap Bluff Cottage.
Noise		
40	Concern about the potential noise impacts of the proposal.	In responses to the submissions raised, significant changes have been made to the proposed development to avoid any adverse acoustic impacts. Most notably, Constables Cottage will now retain its existing use as short-term holiday accommodation and the second storey addition to the Armoury is no longer

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		proposed.
2	The Acoustic Assessment was inadequate and unrealistic.	An updated Acoustic Report has been prepared by Marshall Day Acoustics to assess the impacts of the revised proposal (Appendix C). The revised Report assesses the matters raised by OEH in their response to the exhibited REF and is considered adequate.
1	The proposal exceeds the relevant noise criterion, and would fail to maintain a reasonable level of acoustic privacy to the neighbouring properties.	Noted. The assessment demonstrates that the proposed use is able to comply with the relevant noise criteria, subject to implementing the relevant mitigation measures, as outlined in more detail below.
1	Dockside should be responsible for limiting the hours of operation (to 10pm) at night across all the proposed venues, ensure the responsible service of alcohol and containment of noise arising from these venues.	The Acoustic Report assesses the proposed hours of operation (to 12:00 midnight) and confirms that noise impacts associated with the proposal can be appropriately managed, and are acceptable. As outlined in the Operational Plan of Management, the venues will be managed in accordance with RSA requirements.
1	Concern about the noise from patrons, taxis dropping and picking people up, delivery vans, wedding cars.	The Acoustic Report considers noise associated with vehicles entering and exiting the site. Vehicle and carpark activity is shown to comply with the NSW INP criteria for the worst-case scenario (all functions starting at the same time, and for all functions finishing at the same time).
1	Concern that noise ricochets between the cliffs along the bay. It's worse than normal sound over water. The proposal will make this worse.	Noted. The assessment demonstrates that the proposed use is able to comply with the relevant noise criteria, subject to implementing the relevant mitigation measures, as outlined in more detail elsewhere in this response.
1	Concern about the proposed hours of operation to midnight, seven days a week.	Noted. Refer to responses above. The hours of operation have been taken into consideration as part of the revised acoustic assessment. The assessment has found that the development is capable of complying with the relevant acoustic criteria, subject to implementation of appropriate mitigation measures.
1	There is a risk to the proponent that community objection to the opening hours will threaten their licence.	Noted. Gap Bluff Hospitality is confident that the proposed uses can be managed to avoid any impact on the community.
1	Concern about drunken and aggressive behaviour as a result of the proposal.	An Operational Management Plan will be put in place to manage the behaviour of guests.
1	Question as to whether Dockside Group has been in contact with the police regarding the proposal?	Gap Bluff Hospital has not had any direct contact with the Police regarding the proposed activity. However, it is understood that Council consulted with Rose Bay Police during the public exhibition of the REF in 2015.
		As outlined in the Operational Plan of Management, the Licensee will be required

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		to consult with the Police prior to commencement of the function centre use.
Heritage		
12	The Gap Bluff area is beautiful and of natural heritage and should be preserved for all to enjoy.	Noted. The proposal seeks to adaptively reuse the buildings so that it can continue to be enjoyed by future generations.
2	Preserve and improve Constables Cottage and open it up for more public access.	In response to the concerns raised, Constables Cottage will now retain its existing use as short-term holiday accommodation.
1	The proposal does not include any historic activation or reinterpretation of the sites for the general public.	<p>The proposal seeks to conserve six buildings of historical significance, and make them available for public use. Gap Bluff Cottage and 33 Cliff Street will be available for use as short-term accommodation for the first time. In addition, the revised proposal will result in significant improvements to public access by:</p> <ul style="list-style-type: none"> • Enabling complimentary community use of Officers Mess or Armoury on up to 10 occasions per year; and • Hosting an annual Community Open Day to Constables Cottage, 33 Cliff Street, Green Point Cottage and Gap Bluff Cottage.
1	Suggestion to explore the opportunity to create galleries or an artist in residence program.	These uses would not be financially viable. The uses must be financially viable so that they can, in turn, facilitate the conservation of the site's heritage significance and improved public access to the sites. The commercial nature of the proposed uses will facilitate the ongoing operation and maintenance of the park.
1	Concern that the scheme does not include any historic activation or interpretation of the site for the public.	Refer to response above.
1	Suggestion to lease Constables Cottage at low rent provided that the tenant undertake restoration and maintenance work. This has been done successfully with Bronte House.	Constables Cottage will now retain its existing use as short-term holiday accommodation. The uses of all six buildings must be financially viable so that they can, in turn, facilitate the conservation of the site's heritage significance and improve public access to the sites.
1	The park is for people to enjoy and not to make profit from.	The proposal seeks to strike a balance between public enjoyment of the park, and ensuring the long term financial viability of Gap Bluff. Financially viable uses are required to ensure that ongoing maintenance and conservation works can be undertaken. The proposal also seeks to enhance public access to six disused buildings, and will not limit public access into and around the park.

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1	The proposal would adversely impact upon the heritage significance of the Officers Mess, The Armoury, Constables Cottage, Gap Bluff Cottage and Green Point Cottage which are designated as Heritage Items within the Woollahra Local Environmental Plan 2014.	A revised Heritage Impact Statement (HIS) has been prepared. The HIS confirms that the proposed development will not have any adverse impacts on the heritage significance of the precincts. In some instances, for example the reconstruction of the parapet on the Officers Mess, the works will have a positive heritage outcome for the site.
Environment		
5	The proposal does not preserve the use and character of the National Parks area.	Refer to response above and below.
3	Concern that Dockside has no experience in managing culturally and environmentally significant sites.	<p>Gap Bluff Hospitality Pty Ltd is owned by Christopher Drivas, Managing Director of Dockside Group currently managing some of Sydney's prime harbour-based function centres, including the Gap Bluff Hospitality Pavilion in Darling Harbour, Campbell's Stores in The Rocks and Orso Bayside at The Spit, Mosman.</p> <p>Dockside Group has significant experience with managing function centres and restaurants, including experience with weddings, business events, special occasions and formals. Further, facilities operated by Dockside Group are located in some of the most environmentally and visually sensitive areas of the harbour, such as The Rocks, Middle Harbour and Darling Harbour.</p>
2	The proposal fails to protect the intrinsic value of the National Park for the local residents and the broader public.	<p>As detailed above, the proposed activity is consistent with the objects of the National Parks and Wildlife Act and the intrinsic value of the National Park. In summary:</p> <ul style="list-style-type: none"> • The proposal would not affect the conservation of nature; • The proposal aims to respect the heritage significance of the buildings. • Overall, the proposal would result in the refurbishment and long-term upkeep of a number of heritage buildings. • Public access arrangements will either remain as they currently exist, or will be improved. Specifically, public access to the land within the Gap Bluff Precinct (i.e. around the Armoury and Officers Mess) will be maintained. • The proposal would continue to facilitate management of the surrounding NPWS land in accordance with the <i>Sydney Harbour National Park Plan of Management 2012</i>.
1	The Gap Bluff Flora and Fauna Assessment prepared by Ecological Consultants Pty Ltd (June 2015) is inadequate.	The Flora and Fauna Impact Assessment has been updated to address

Number of times raised in Submissions	Item Raised	Proponent's Response
		comments raised by OEH. A copy of the revised Assessment is provided at Appendix N of the REF.
1	Concern over the impact on endangered species of birds, frogs, plants and reptiles.	The revised Flora and Fauna Impact Assessment confirms that the proposal will not have any adverse impacts on any endangered flora or fauna species.
1	Concern about the removal of native flora species.	Refer to response above.
1	Concern about the retention of non-native and non-local native species of flora.	Where possible within the scope of the proposed activity, non-native and weed species will be removed and replaced by native species.
1	Concern about the clearing of weed species without replacement by local, native species of flora.	As outlined on the Landscape Plans at Appendix A , where possible, weed management will be undertaken and weed species will be removed.
1	Concern about proposed increase in traffic movements in the park. This increase in traffic could lead to increased road kills. Species likely to be impacted include mammals, birds, reptiles and amphibians.	The Flora and Fauna Impact Assessment acknowledges that increased car movements, especially at night, could result in increased road-kill. To mitigate this, slow speed limits (10km/hr) will be imposed within the site. This speed limit will replace the existing 25km/hr limit.
1	Concern about the proposed excavation of 8.5m ² of bush rock. The suggestion that the excavated rock could be distributed throughout rehabilitated areas as Gap Bluff as lizard habitat is not based on any assessment of the impact.	The proposal no longer requires any excavation of the rockface.
1	Concern about the increased light over increased periods of time within the park. There is no evidence in the REF of the impacts of noise on resident / visiting faunal species at Gap Bluff.	The revised Flora and Fauna Impact Assessment considers the impact of lighting on fauna species. Lights should be directed to lit facing down to the ground rather in bats flight paths (typically horizontal across the landscape). This will benefit other nocturnal species in the area. Preferably installation of LED lights or low pressure lights with longer wave lengths is recommended to minimise potential impacts on the local microbat population.
1	Concern about the increased noise over increased periods of time within the park. There is no evidence of in the REF of the impact on light on resident/visiting faunal species at Gap Bluff.	The revised Flora and Fauna Impact Assessment considers the impact of noise on fauna species. Noise impacts have been shown from previous studies to alter the use of habitat by microbats. Bats will respond to noise as far as 40 metres away and avoid locations with noise levels above 88 decibels. Mitigation measures to reduce the impacts of noise and lighting may be required. Work between daylight hours and limit the amount of noise pollution by regular intervals on half an hour breaks from noise.
1	The significance of the remnant bushland at Gap Bluff should not be assessed on the presence/absence of threatened plant species but also	A series of 7-Part Tests have been carried out as part of the revised Flora and Fauna Impact Assessment. The revised Assessment has found that the proposal

Number of times raised in Submissions	Item Raised	Proponent's Response
	on the habitat the vegetation provides for threatened species.	will not have any impact on any threatened flora and fauna species, or their habitats.
1	The list of species provided for the study area is incomplete.	Updated lists are provided as part of the revised Flora and Fauna Impact Assessment. The species lists are based on on-site quadrat surveys, and are considered comprehensive.
1	The Flora and Fauna Impact Assessment fails to provide an assessment of the proposed vegetation modification on current densities of Noisy Miners (<i>Manorina melanocephala</i>) and possible ameliorative measures in relation to the proposed development.	The revised Flora and Fauna Impact Assessment considers the impact of the proposal on threatened species. Noisy Miners are not a threatened species. The <i>Threatened Species Conservation Act 1995</i> seeks to protect other birds from being impacted by Noisy Miners.
Cumulative impacts and socio economic issues		
1	Concern that the developer will not be able to generate a significant return on the proposal which will in turn lead to economic failure.	<p>Dockside Group is a successful operator, and it is anticipated that the proposed uses will be financial viable. As an experienced and successful operator, Dockside Group:</p> <ul style="list-style-type: none"> • Holds the necessary insurances, including public liability insurance; • Manages and coordinates ticketing arrangements with event organisers, as necessary, depending on the type and nature of the event; • Has the necessary financial backing to ensure the ongoing viability of the operation; • Has arrangements in place if events and functions are cancelled or postponed; and • Has dedicated marketing staff to manage marketing and media enquiries.
Sewage and waste collection		
6	Concern about the increase in rubbish as a result of the proposal.	<p>The short-stay accommodation cottages will generate waste volumes consistent with a typical residential use.</p> <p>Waste associated with the Armoury and Officers Mess will be managed on site, in accordance with the Operational Waste Management Plan.</p>
1	Concern that the sewage system is very old and unable to cope with extra sewage.	This will be assessed as part of the renovation works, however as the proposed capacities are consistent with the previous use of the site, there will be no increase in sewage or increased pressure on the sewage system.
1	It is not clear from the Waste Management Plan about how waste will be collected from each venue and taken to a central waste point.	Under the revised proposal, both the Armoury and Officers Mess are provided with their own waste management areas. The four cottages will generate waste

Number of times raised in Submissions	Item Raised	Proponent's Response
		quantities consistent with a typical residential use, and will utilise Council waste bins.
Alternative proposals		
1	If the proposal doesn't go through then NSW National Parks and Wildlife Service should seek an external operator to manage and rent the Constables Cottage for visitors as before or on a longer term lease.	In response to the concerns raised, Constables Cottage will now retain its existing use as short-term holiday accommodation.
1	Through careful planning and sympathetic design, the public will be able to enjoy the use of the buildings without turning Watsons Bay into another Darling Harbour.	Noted. The proposal seeks to achieve a sympathetic outcome for the site.
1	Constables Cottage could become a Bed and Breakfast.	In response to the concerns raised, Constables Cottage will now retain its existing use as short-term holiday accommodation.
1	Green Points Cottage could be used for holiday rentals or a short term lease.	Green Point Cottage will be used as short-term holiday accommodation.

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The Watsons Bay Association Inc	
Amenity for Park Visitors	
The proposal does not support the 2010 PoM objective of enhancing the visitor's cultural experience.	Refer to responses above. The proposed activity is considered to be consistent with the <i>Sydney Harbour National Park Plan of Management 2012</i>
The proposal is not exemplary, and does not provide any 'opportunities for accepted customary visitor enjoyment' as called for in the PoM.	Refer to responses above. The proposed activity is considered to be consistent with the <i>Sydney Harbour National Park Plan of Management 2012</i> . The proposal will facilitate public access to, and enjoyment of, currently disused buildings. The proposal will not impact or preclude public access into and around the park. The proposal will not change the way that the park is used and enjoyed by visitors.
Planning Issues	
The cumulative impact of the proposal fails to consider the aims and objectives of the NPWA Act or PoM	In response to the issues raised during the public exhibition period in 2015, the scale of the development has been reduced to lessen the cumulative impact of the proposal, and to ensure consistency with the objectives of the NPWA Act.
The Watsons Bay environment is already stressed beyond reasonable capacity	In response to the issues raised during the public exhibition period in 2015, the scale of the activity has been reduced to lessen the impact of the proposal and to ensure no adverse impacts on the Watsons Bay precinct with respect to noise, traffic and parking which cannot be appropriately managed.
The adaptive reuse proposal does not exhibit any special natural resource management, community or cultural features that support its approval	<p>The adaptive reuse will enable the conservation of six historically significant buildings which would otherwise remain unused, and fall further into a state of disrepair. Whilst community or cultural uses would not be economically viable, Gap Bluff Hospitality proposes to improve public access and community use by:</p> <ul style="list-style-type: none"> • Enabling complimentary community use of Officers Mess or Armoury on up to 10 occasions per year; and • Hosting an annual Community Open Day to Constables Cottage, 33 Cliff Street, Green Point Cottage and Gap Bluff Cottage.
Should the Minister remain unconvinced by the submissions made by WBA and others, a public hearing should be conducted	Noted.
Legislation and consistency with Plans of Management	
Examination of the legislation and Plans of Management fails to demonstrate any alignment between the broad vision and objectives for the management of public	The proposal is consistent with the specific sections of the SHNP PoM relevant to each precinct.

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parklands and the proposal	<ul style="list-style-type: none"> • The Armoury, Gap Cottage and Officers Mess form part of Precinct 03: Gap Bluff. Project 11, which sits under Precinct 03, allows for adaptive re-use of the precinct for the purpose of appropriate community and commercial uses, such as visitor and tourist accommodation, administration, or for conferences and functions. The proposed uses are consistent with these intended uses and are consistent with the management principles of the park. The PoM also identifies an area for new buildings. The proposed works to the Armoury, Gap Cottage and Officers Mess are within this area for new buildings or structures. • Constables Cottage, 33 Cliff Street and Green Point Cottage form part of Precinct 02: South Head, Camp Cove and Green Point. These buildings are identified for new adaptive uses, such as accommodation. <p>Further, one of NPWS's key projects for the Sydney Harbour National Park is to realise the potential for exemplary adaptive re-use management of the Gap Bluff Precinct. Through investigation of appropriate community and commercial uses, NPWS seeks to provide increased opportunities for visitor appreciation and access to the site.</p> <p>A key aim for the Camp Cove and Green Point Precinct is to convert buildings, sites and collections and, wherever possible, make these elements accessible to the public. The Plan of Management also seeks to maintain traditional passive recreation opportunities while enriching the precinct with new tourism opportunities. These new initiatives will allow a greater diversity of visitors to experience the magnificence of the Harbour headland and the tranquillity of Camp Cove.</p> <p>The proposed activity responds to the aims of the Plan of Management, as summarised below.</p> <ul style="list-style-type: none"> • The buildings in question are currently vacant. The proposed activity will make these buildings accessible to the public, thereby increasing public access to, and appreciation of, the park. The implementation of a program which enables complimentary community use of Officers Mess or Armoury on up to 10 occasions per year, and an annual community open day for Constables Cottage, 33 Cliff Street, Green Point Cottage and Gap Bluff Cottage, will further enhance public access to the park. • The buildings are suitable for visitor and tourist uses, such as function/reception centres and short-term visitor accommodation. • There is an opportunity to revitalise both precincts through the exemplary adaptive reuse of the buildings to allow increased opportunities for visitor appreciation and access to the site.

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	<ul style="list-style-type: none"> • The proposal will allow for the upgrade and maintenance of the public domain within the precincts by the proponent, whilst maintaining public access through both precincts. • The precincts have a high level of amenity, and have historically been popular venues for weddings and special events. • The renovation and restoration of the buildings for commercial purposes will enable the heritage significance of these buildings to be conserved and appreciated.
<p>Narrow interpretation of the NPWA allows the use of parklands for 'functions,' and indeed this activity was previously permitted on the site. However the invasive scale and nature of the GBH proposal fails to satisfy the principles espoused in the PoM.</p>	<p>The Plan of Management for the site explicitly nominates commercial uses 'such as...functions', as well as short stay accommodation as appropriate uses within the Gap Bluff precinct and South Head, Camp Cove and Green Point precinct, respectively.</p> <p>Notwithstanding this, in response to the concerns raised by the community during the public exhibition of the proposal in 2015, the scope of the development has been significantly reduced. In this regard, Constables Cottage will now be used for short-term accommodation and the scale of the Armoury has been reduced so that it is now consistent with the scale of the current building.</p> <p>As a result, there is no significant increase in the intensity of the previous function centre use on the site.</p>
<p>Operating a 420-patron function complex for 7 days, from 0600-midnight, in the heart of South Head must impact adversely on the park's values and accepted customary visitor enjoyment</p>	<p>The revised proposal seeks to reduce the hours of operation to between 8:30am and 12:00 midnight, 7 days a week (last drinks served at 11:30pm and service staff to depart by 12:30am). It also proposes to impose a daily cap on patron numbers, with a maximum of 410 guests attending functions at the Gap Bluff Precinct on any one day.</p> <p>The reduction in capacity, and change of use for Constables Cottage, will ensure that any adverse impacts associated with the use are minimised, and will enable visitors to continue to enjoy the park's values.</p>
<p>There is a dramatic conflict of use when mixing visitors wishing to experience the peace and beauty of a national park with wedding, bucks' and hens' parties, gala dinners, or school formals, corporate events and product launches celebrated</p>	<p>Function centres are identified as an appropriate use in the Gap Bluff precinct. Notwithstanding this, the measures outlined in the Operational Plan of Management will ensure that functions are managed in an appropriate manner, and that the function use does not impact on the public's enjoyment of the National Park.</p>
<p>Spatial and temporal separation, as stipulated in the PoM, at Gap Bluff is impossible unless the function centres were to be walled off as separate compounds within the national park, and this is clearly an untenable proposition.</p>	<p>In the interest of maintaining public access into and around the park, and the parkland setting of the site, no physical separation is proposed between the park and function centre uses.</p> <p>Access to this precinct will be maintained at all times for walking or other</p>

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	recreational activities. Access to the specific buildings within the precinct will be only during operating hours and will be limited to staff or function guests.
The Masterplan	
The EOI does not present any Masterplan for the development of the site. It does not indicate or define the extent of land within the parkland to be controlled and maintained by the proposed lease agreement with GBH. This is critical to assess the accessibility of parkland for visitors while it is used as a function venue.	A Master Plan was not a requirement of the EOI. However, it is assumed a plan will accompany the Lease that will clearly define areas of responsibility. The agreement from a maintenance perspective determines that all areas within the tree line will be Gap Bluff Hospitality's responsibility to maintain. Despite this demarcation, this does not relate to or restrict public access to the National Park areas, The only areas that will be restricted from access at any given time will be the buildings themselves, as is currently the case.
The proposed Gap Bluff activities will alienate at least half of the area of public reserve at Gap Bluff (i.e. the three Army remnant buildings and associated carpark and service vehicle requirements)	The public will continue to be able to access the entire Gap Bluff precinct, even when functions are taking place.
Access to the parkland is heavily compromised by the GBH proposal, which is entirely inconsistent with the peaceful enjoyment that park visitors should rightfully expect.	Refer to response above. The proposal will not limit access to any part of the Gap Bluff precinct. Rather, the proposal will make the three disused buildings within the precinct publicly accessible, and will ensure that these buildings of historical significance are conserved and maintained. Access around the through the park will not be restricted.
The Role of Woollahra Council (WMC)	
<p>The GBH proposal would result in a host of issues that would require additional Council resources. These include:</p> <ul style="list-style-type: none"> • traffic management on local roads • additional road safety measures (footpaths, kerbside upgrades, signage) • parking control issues • street lighting to assure late night patrons of security • trash and littering • noise complaints. 	Noted. Council will be the appropriate regulatory authority for the proposed activity. Notwithstanding this, it is anticipated that these matters can be appropriately managed to mitigate any impacts.
The Interests of the Commonwealth	
Schedule 8 of the Commonwealth's Environmental Protection and Biodiversity Conservation (EPBC) Act, 1999, consistent with the Guidelines for Protected Area Management Categories of the IUCN12, under which the Sydney Harbour National Park falls, the Commonwealth Government has enshrined the following principles for the management of public reserves:	<p>As documented throughout the revised REF, it is considered that the proposed activity is consistent with the Schedule 8 of the EPBC Act.</p> <p>The original and revised proposal has been subject to consultation with key stakeholders. Further, the revised proposal will be publicly exhibited to enable comment on the revised scheme.</p>

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<ul style="list-style-type: none"> • community participation • effective adaptive management • precautionary principle • minimum impact • ecologically sustainable use • transparency in decision-making, and • joint management. <p>The process by which the Gap Bluff proposal has moved to the current advanced stage of evaluation fails to meet these criteria.</p>	<p>The revised proposal comprises refurbishments to existing buildings and seeks to minimise any environmental impact associated with the originally proposed activity, with the reduction in the scope of works lessening any adverse amenity or environmental impacts.</p> <p>The proposal will result in an improved sustainability outcome for the existing buildings. The precautionary principle states that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.</p> <p>The revised proposal is supported by environmental studies and technical reports which conclude that there are no environmental constraints that preclude the development of the site in accordance with the proposal, subject to appropriate management in future planning, design, construction and operational stages.</p> <p>Finally, the joint management of the park by NPWS and Gap Bluff Hospitality will:</p> <ul style="list-style-type: none"> • Provide public benefits through greater access and enjoyment of the grounds and heritage buildings; • Enable the conservation of heritage significant buildings that would otherwise continue to fall into disrepair; • Facilitate upgrades to the public domain and landscape surrounding each building, and coordinated waste management and cleaning of each building and surrounding landscapes; and • Ensure the viability of Gap Bluff, enabling the uses to prosper and become an increased asset to the National Parks and Wildlife Service and NSW Government.

Alternative Use

<p>The community appreciates that state agencies are subject to budgetary pressures for the upkeep of public parklands and fully understands the need for private partnerships to facilitate solutions that sustain the maintenance of these areas.</p>	<p>Noted. The proposal seeks to provide an economically feasible development that will enable the ongoing maintenance and conservation of the buildings and park.</p>
<p>Solutions have most successfully been found when NPWS, other agencies and private interests have worked closely with local communities to achieve a carefully planned and consultative outcome.</p>	<p>Noted. In response to the concerns raised by the community, the scale of the proposal has been reduced to lessen any environmental or amenity impacts associated with the development.</p> <p>Since the public exhibition of the REF in 2015, Gap Bluff Hospitality has engaged with members of the community to discuss the revised development.</p>
<p>In addition to deep concerns with concept and purpose, the community also has considerable anxiety relating to the management and monitoring of compliance issues</p>	<p>Council will be the appropriate regulatory authority for the proposed development.</p>

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at the Gap Bluff site.	
<p>WBA considers that use of the assets should involve the creation of a facility that blends creative innovation with commercial realities to produce a result that embodies Sydney's status as a 'world city' and imbues pride in its presentation. Hosting wedding receptions hardly meets these criteria.</p>	<p>The proposed uses are considered to be the most suitable for the buildings, and are consistent with the uses identified for the precincts under the Plan of Management. Although a cultural or civic use may be suitable, these uses would be unlikely to be commercially viable and would require significant funding commitments or donations. The proposed uses as function centres and short-term visitor accommodation will be commercially viable, and the types of environmental impacts associated with these uses are able to be managed through the implementation of appropriate mitigation measures.</p>
The Realities of the GBH Proposal	
<p>WBA investigations, however, indicate that the projected Gap Bluff Hospitality operations would increase the functions capacity of the Watsons Bay precinct by approximately 30%</p>	<p>Noted. The revised proposal (which seeks to remove the first floor addition to the Armoury and change the use of Constables Cottage to short-term accommodation) will significantly reduce the capacity of the development.</p>
<p>The proposed three new venues at Gap Bluff offer functions capacity for 420 guests at cocktail functions and 395 at combined banquet/cocktail events</p>	<p>The revised proposal comprises two function venues. Together, the venues will have a maximum capacity of 270 (with both function centres operating at full capacity).</p>
<p>The proposed (0600-12 midnight) operating hours would result in the simultaneous egress of large numbers of departing party guests, with inbound guests doubling traffic movements at peak times.</p>	<p>The revised proposed operating hours are 8:30am and 12:00 midnight, 7 days a week (last drinks served at 11:30pm and service staff to depart by 12:30am). A range of mitigation measures will be implemented to ensure that traffic impacts are managed during peak times.</p>
<p>In addition, there would be high volumes of guest movement late at night in the centre of a residential district that after 10pm, is not well serviced by either taxis or public transport</p>	<p>The expected modal split (and proportion of patrons who are expected to use taxis) is based on surveys of Dockside's Orso Bayside function centre.</p> <p>The revised proposal to have all vehicles enter via Lighthouse Road and exit via Military Road will mean that exiting vehicles will no longer pass residences on Cliff Street, The Duty Manager will place calls to Taxi/Uber companies as required.</p>
<p>Specifically, with regard to wedding receptions, there are a number of features of these events that impinge on the amenity of a national park setting. They are:</p> <ul style="list-style-type: none"> • pre-reception bridal party 'events' including photography and champagne tables • open bar - higher than normal alcohol consumption • high noise levels as a result of music, multiple speeches, applause etc. • an additional vehicle complement – bridal car fleets, photographers, flowers etc. • guests staying in complimentary accommodation on-site to be provided by GBH and enabling them to party on. 	<p>The Operational Plan of Management outlines the measures which will be implemented to ensure that all events, including weddings, do not adversely impacts the amenity of the park setting. The Acoustic Report and Traffic Report have both considered impacts associated with weddings and other function uses, and propose a range of measures to ensure that no adverse amenity impacts arise.</p> <p>Users of short-stay accommodation, including bridal parties and guests, will be required to comply with very strict Terms and Conditions determining capacity, noise regulation and visitor numbers. The Terms and Conditions will be closely administered including considerable Bonds ensuring compliance.</p>

Item Raised	Proponent's Response
Constables Cottage	
<p>WBA and all residents of the immediate area see no need for a licenced restaurant, and consider that any licensed restaurant activity should appropriately take place within the commercial precinct of Watsons Bay, not on Camp Cove beach within the national park and in proximity (50 metres) of beachside residences.</p>	<p>Constables Cottage is no longer proposed to be a licensed restaurant. In response to the issues raised, Constables Cottage is now retaining its existing use as short-term holiday accommodation.</p>
<p>The proponent has indicated that the restaurant would be provided as “a much-needed facility for local residents,” even while noting the past failure of restaurants in the precinct. Three restaurants have closed in Watsons Bay in the past five years. Dunbar House, which operates under lease from Woollahra Council, is primarily a function centre and concedes there is no business in evening dining.</p>	<p>Constables Cottage is no longer proposed to be a restaurant. In response to the issues raised, Constables Cottage will now retain its existing use as short-term holiday accommodation.</p>
<p>The key findings from the parking occupancy survey indicate that under existing conditions the majority of the parking provisions within the study area are at or over capacity during the weekend peak periods, which is likely to coincide with the peak use of the proposed development sites. Therefore, existing parking provisions are insufficient for supporting the parking requirements of the proposed development</p>	<p>Parking and traffic considerations have been addressed elsewhere. Constables Cottage will now retain its existing use as short-term holiday accommodation, with the on-site parking provision catering for demand.</p>
Traffic Issues	
<p>There are no statistics available on historical road traffic flows in the area. Strong anecdotal evidence indicates, however, that there has been a sustained increase in car and tourist bus traffic over the past three years</p>	<p>The parking and traffic analysis is based on empirical evidence and traffic surveys.</p>
<p>The intense parking congestion in Watsons Bay/Camp Cove is well-known to local beachgoers, but not to the many ‘speculative’ visitors who gamble on securing a parking space, wanting to enjoy the sheltered beach and unique village atmosphere of Watsons Bay.</p>	<p>As outlined above, all parking associated with the revised proposal can be accommodated within the site.</p>
<p>At the present time on Gap Bluff there is limited parking for guests and staff of the Officers Mess, Armoury and Gap Bluff Cottage:</p> <ul style="list-style-type: none"> • the areas in proximity to the buildings provide a total of 70 parking spaces, • comprising 60 spaces for guests and 10 spaces reserved for staff. 	<p>The Gap Bluff precinct now provides 102 parking spaces consisting of 60 parking spaces for guests, 2 accessible spaces to be provided and designed for disabled users, 10 parking spaces for staff and 30 overflow parking spaces. This parking capacity would accommodate 100% of parking demands generated by the site. Accordingly, the Gap Bluff precinct provides sufficient parking to accommodate 100% of the anticipated parking demand generated by both function centres, without placing any demand on on-street parking within the wider Watsons Bay area</p>
<p>No particular allowance has been made for bridal cars or support or service vehicles.</p>	<p>Based on empirical evidence from Dockside's Orso Bayside venue, the ‘alternative mode’ of travel (which accounts for 30% of visitors) also includes bridal vehicles.</p>

Item Raised	Proponent's Response
Issues for the Disabled	
<p>The supporting documentation for the GBH project makes no reference to the impact of the development on disabled visitors to the Gap Bluff precinct of the national park</p>	<p>A Statement of Compliance - BCA Access Provisions accompanied the exhibition material (refer to Appendix F). The Statement confirms that the proposed development is capable of achieving compliance with the access provisions of the BCA and Access to Premises Standards. The work to the Officers Mess includes installation of a new lift, and the Armoury will include a new platform lift to provide equitable access to the reception area. The proposed activity does not seek to make any changes to existing access arrangements into or around the park.</p>
<p>A development of the scale of the GBH project must ensure the access and rights of disabled visitors are enhanced, not degraded.</p>	<p>Refer to response above. The work to the Officers Mess includes installation of a new lift, and the Armoury will include a new platform lift to provide equitable access to the reception area.</p> <p>Further, 2 accessible spaces to be provided and designed for disabled users</p>
<p>The Operational Plan of Management (Transport Management Plan – p9) emphasises that GBH will: “Restrict vehicle access to function Patrons only and not allow the general public parking.” This edict effectively means that most disabled visitors to the park will be denied entry, noting that few but the most powerful motorised wheelchairs could ascend the entry road.</p>	<p>Historically the access road to the Gap Bluff Centre has remained locked at all times. Gap Bluff Hospitality will maintain this position so as to avoid access for 'casual parkers'. This maintains the status quo and in no way changes what has been established NPWS practice.</p>
<p>The three ‘Bridal Suite Cottages’ are deemed by Accessible Building Solutions to be: “Class 1b buildings and there are no access requirements as there are less than 4 dwellings on each site.” This suggests that the properties would not be available to any disabled bridal couples, as well as disabled bridal party members and the general public, should short-term accommodation for the public be offered by GBH.</p>	<p>Noted. The level of accessibility provided is consistent with the relevant legislation and accessibility standards. The level of accessibility is also a response to the extent of work able to be carried out to each building in the context of their heritage significance.</p>
<p>The GBH proposal is in contravention of the Office of Environment and Heritage's Plan of Management, especially its goals and aspirations for the greater inclusion of people with disabilities into the park's facilities and activities.</p>	<p>Gap Bluff Hospitality will introduce disabled access into the Armoury and the upper level of the Officers Mess which has never been available to date. In addition DDA compliant toilets will also be introduced.</p>
Public Transport Facts	
<p>Supporting documentation makes frequent reference to Watsons Bay being well serviced by all modes of public transport. There is an inherent presumption of a highly elastic supply of public transport.</p>	<p>Noted. Public transport services are outlined in the Traffic Impact Assessment Report and accompanying Draft Traffic Management Plan.</p>
<p>Public buses provide adequate evening services, although limited later at night, but ferry and taxi services are problematic</p>	<p>Refer to response above. The Duty Manager will place calls to Taxi/Uber companies as required.</p>
<p>Most function guests (the majority for weddings) do not take buses. Guests are</p>	<p>The expected mode split is based on surveys of Dockside's Orso Bayside function</p>

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usually dressed in semi-formal or formal ware. Taking public transport to Watsons Bay, walking uphill to the function centre - or a lengthy late night bus trip to an interchange at Bondi Junction or Edgecliff, or via the CBD - is simply not a likely transport option. Most guests will want to use private cars.	centre.
Road Safety	
WBA has engaged a safety assessment of key access corridors (vehicular and pedestrian) for the proposed development. The results of this assessment are disturbing. They reveal three risks rated as 'Intolerable' and 13 rated as 'High.'	The stair between Cliff Street and Lighthouse Road is a pre-existing issue for southbound traffic noting that the proposed development does not increase the intensity of traffic at this point. That is to say, traffic will approach from the external road network to the south and all entering traffic will be northbound traffic on Cliff Street. Irrespective, the safety assessment that was prepared by SMEC Consultants raises a valid pre-existing issue for the precinct in general. This poor sight distance issue could be addressed with the removal of an on street parking space providing improved inter-visibility between car drivers and pedestrians.
The convergence of traffic activity at the entrance to the Gap Bluff site could not be worse. The increased visitor load that would accompany the GBH project would involve all of these high risk sites, with accident risk likely to be greatly exacerbated with high-spirited (and not infrequently inebriated) guests exiting the site.	It is proposed to further improve the internal private access roads by implementing shared zone speed traffic management. The intensification and use of the Military Road access point to the site has been reduced through the implementation of the one-way system (entering via Lighthouse Road and exiting via Military Road access). In order to manage any increase in pedestrians at this location, a Gap Bluff employee (as part of the traffic management solution) can be located at the access point to assist with pedestrian movements and ensure the one-way system for general vehicles is adhered to.
Emergency Services	
WBA is unaware whether these concerns have been addressed by the relevant authorities. Our enquiries suggest that they have not. A consideration of broader risk factors is certainly not apparent in the GBH proposal, although it does deal in some depth with concerns related to inebriation.	Emergency vehicle access to and from the site will be available at all times. This process would be implemented through emergency protocols on the site, which would include a requirement for site personnel to assist with emergency access, as required. The traffic management plan does not propose obstruction of traffic flow on Lighthouse Road. Any emergency access necessary to the function centre area would seek direct access via the Military Road access driveway. Noting that as part of the TMP, the internal road is proposed to accommodate one-way exit movements only, there should be no impediment to access the site on the basis that the internal road can accommodate two-way flow.
The expansion in activity proposed would, moreover, have a major impact on traffic and the ability of emergency services to respond to incidents in the Watsons Bay precinct in a timely manner.	Refer to response to traffic issues above.

Item Raised	Proponent's Response
Risk and Sustainability Issues	
<p>There are significant risks attached to operating a high volume/late night function centre in a national park adjacent to a residential area. These include:</p> <ul style="list-style-type: none"> • A high level of complaints about noise, traffic and access. Previous residents' experience with functions at Gap Bluff and the evidence in the draft PoM attests to this. Under NPWS management, rangers were on site to respond to noise complaints. As there is no central point for complaints, grievances will be directed to Rose Bay Police. Their capacity to respond to such a high level of complaints is limited. • Frustration with noise and the complaint process can be expected to lead to legal action and court orders to cease or inhibit operations. OEH has experience with a similar halt in its business at Vaucluse House where the licence was suspended by the Office of Liquor Gaming and Racing (OLGR) due to noise complaints. • Loss of profits, as a result of attenuated operational conditions, may result in claims for compensation from the operator as a result of OEH being unable to deliver the stable operating conditions that are specified in the lease. 	<p>Concerns relating to traffic and noise have been addressed elsewhere in this response. With the implementation of appropriate mitigation measures and operational management procedures, it is anticipated that the proposed activity can operate without any adverse impacts on surrounding areas.</p>
Heritage Matters	
<p>The Constables Cottage property is of particular significance in view of its historical significance as a Water Police base. The massive (threefold increase in footprint) changes proposed to convert this cottage to a 72-seat licensed restaurant would essentially destroy its heritage character.</p>	<p>Noted. Constables Cottage is now proposed to be retained as short-term accommodation. The revised proposal will result in fewer alterations to the fabric of the building, with the proposed works limited to upgrades of spaces which have little heritage significance.</p>
<p>The change of use, alterations and additions to all five buildings will diminish the ability to understand the linked histories between the subject places and the highly significant associated sites located within and around each of them.</p>	<p>The proposed renovations to the buildings under the revised proposal are considered minor, and the uses are consistent with those identified for the site under the Plan of Management for the park, and represent a planned, deliberate decision for the park's future. The proposal will prevent these historically significant buildings from falling into further disrepair, and will enable the history of these buildings to be enjoyed by future generations.</p>
<p>The absence of a carefully-considered interpretation plan and the introduction of commercial use into an area continuously owned and managed by governments since the early 1800s, pose a real threat to the range of heritage values present at each of the five subject sites and their ability to be interpreted in the future.</p>	<p>The introduction of commercial uses into these buildings is critical to the viability and ongoing maintenance of these important heritage buildings. The proposed works have been designed in close consultation with heritage specialists from NBR Architecture, and are considered an appropriate outcome for the site. The ongoing use of the buildings will be carefully managed to ensure that the heritage values of the site are maintained.</p>

Item Raised	Proponent's Response
The proposal does not provide for any of the conservation works at Gap Bluff Cottage, Constables Cottage and Green Point Cottage, as recommended in the SHNP CMP 2010	The proposed activity has been designed to be consistent with the conservation policies outlined for each of the buildings under the Plan of Management. Where variations are proposed, NBRS Architecture has determined that the proposed works are acceptable from a heritage perspective.
The proposal does not include any landscape design plan for the 'First Landing Place at Camp Cove' outlined in the PoM. The level of intrusive works proposed to Constable's Cottage will limit the extent to which this project for the interpretation of Camp Cove could ever be successfully implemented.	Noted. This is outside of the scope of works. The revised scope of works for Constables Cottage now includes only minor internal refurbishments and landscaping works.
The overall approach taken by the proponents is one where the historic and physical context of each of the six sites has been disregarded in order to introduce a new and incompatible use; that is a coordinated commercial enterprise for the provision of wedding receptions and like functions across all six sites.	The proposed uses are consistent with the Plan of Management for the park, and represent a planned, deliberate decision for the park's future. Notwithstanding this, in response to concerns raised by the community during the public exhibiton period, the scale of the development has been reduced, and Constables Cottage has been reverted to short-term accommodation, rather than a restaurant / café. The revised development has been designed in close consultation with the heritage architect, NBRS Architects. Finally, given the minor nature of the works proposed, the physical context and setting of each building will not be substantially altered.
The approach for this proposal is to treat each building individually, regardless of the well-documented and highly significant linked histories that exist between the subject sites, their settings and associated sites within the locality, including HMAS Watson.	Noted. The revised activity proposes minor renovations of the existing heritage significant buildings, in keeping with the uses identified for each building under the Plan of Management for the park. The links between the buildings are acknowledged, and the proposal has been designed in close consultation with the heritage architect, NBRS Architects, to achieve an appropriate outcome for each building and the park as a whole.
The Cottages – Or Bridal Suites?	
The cottages at Gap Bluff, 33 Cliff Street and Green Point have been designated by GBH as 'short stay accommodation.' These properties have been let to the general public for many years by NPWS for recreational purposes.	Noted. These buildings, as well as Constables Cottage, will be available for short-term accommodation.
The cottage will also operate as the Bridal Suite prior to the reception. While this use may appear demure and innocuous, the realities of contemporary Sydney weddings suggest the potential for rolling parties, inconsistent with the operation of national parks. This would take place in the absence of park rangers, who in the past provided a degree of supervision and noise control	All users of short-term accommodation, including bridal parties and guests, will be required to adhere to strict Terms and Conditions, with significant bonds ensuring compliance.
This type of activity in Gap Bluff Cottage is inconsistent with the peaceful use of a national park.	Gap Bluff Cottage will be used for short-term accommodation. The proposed use is considered to be consistent with the park setting. All users, including bridal parties and guests, will be required to adhere to strict Terms and Conditions, with significant

Item Raised	Proponent's Response
<p>The ability of the community to cope with a massive increase in this type of activity would be tested to the extreme with the level of wedding activity forecast from a GBH function complex.</p>	<p>bonds ensuring compliance.</p> <p>The reduced scope of the proposed activity will reduce the potential for adverse amenity impacts with respect to noise, traffic and parking. The REF outlines a range of Mitigation Measures which will be implemented to ensure that any impacts are appropriately managed.</p>
Aboriginal Heritage	
<p>The importance of Camp Cove and Gap Bluff to the traditional owners, the Cadigal people (Gadigal), is not acknowledged anywhere in the GBH proposal.</p>	<p>Since exhibition of the REF in 2015, consultation has been carried out with the La Perouse Local Aboriginal Land Council. The La Perouse LALC has indicated that they did not have any concerns regarding the proposed activity.</p>
<p>The NPWS Plan of Management (PoM) principles and outcomes specific to Aboriginal Heritage are not mentioned and are certainly not addressed by the proposal and its accompanying Aboriginal Heritage Due Diligence Assessment.</p>	<p>Refer to response above. The La Perouse LALC has indicated that they did not have any concerns regarding the proposed activity.</p>
Acoustic Issues	
<p>The planned intensification of use proposed at Gap Bluff can be reasonably predicted to produce a very high volume of noise complaints. The doubling in size of the Armoury building by itself would represent a huge increase in noise pollution potential.</p>	<p>The second floor addition to the Armoury is no longer proposed, and so the impact associated with this building will be significantly reduced.</p> <p>In addition to the recommendations of the cumulative noise assessment (outlined below) the following operational controls will be put in place to ensure compliance with the acoustic criteria:</p> <ul style="list-style-type: none"> • Management controls to ensure windows are closed when hosting functions with music. • Service vehicle, bottle and garbage collection to be limited to the Day period. Where it is required for the collection of bottles or rubbish during the Night period (e.g. after a function), collection must occur with all doors and windows closed. Disposal to outdoor bins must only occur in the Day period. • Gap Bluff Hospitality staff to be trained to limit unruly and loud behaviour within the premises and in transit to transport at the cessation of events, notwithstanding training as required under Responsible Service of Alcohol Legislation. • The awning windows to the Armoury Building to be closed at all times after 10 pm. The awning windows will also need to be closed during the daytime and evening hours during functions with music (see compliant scenarios above). • All sound locks must be design and operated such that there at least one door set closed at any time during patron entry and exit.

Item Raised	Proponent's Response
<p>The location of Gap Bluff Centre, within the arc of sandstone cliffs of the Gap, ensures the strong transmission of noise to residential areas, carried by Sydney's prevailing summer north easterly winds.</p>	<p>Noted. The assessment demonstrates that the proposed use is able to comply with the relevant noise criteria, subject to implementing the relevant mitigation measures, as outlined above and below.</p>
<p>It appears that PKA has not considered the cumulative impact of the Gap Bluff venues operating concurrently, thus vastly underestimating noise generation. If this is the case, the conclusions drawn in the PKA report must be totally discarded.</p>	<p>Marshall Day Acoustics has undertaken a cumulative assessment of the proposed activity (refer to Appendix C).</p> <p>Modelled scenarios in the revised Acoustic Report reflect combined noise output from concurrent functions in the Armoury and the Officers Mess.</p> <p>Noise breakout from the Armoury and Officers Mess function centres was considered for a range of operational scenarios. Compliance is demonstrated for the following operations allowing for the acoustic upgrades and scenarios in Section 6.0 of the Acoustic Report:</p> <ul style="list-style-type: none"> • Functions with music in all rooms during Day, Evening and Night (up to midnight), all windows closed. • Outdoor ceremonies during the Day period. • Indoor functions in the Armoury building with limited music, windows open, outdoor ceremony, function in Officers Mess with windows closed, Day period only. • Indoor functions in the Armoury building with limited music, windows open, functions in Officers Mess with windows closed, Day and Evening periods only. <p>The following operations are not compliant.</p> <ul style="list-style-type: none"> • Outdoor ceremonies during the Evening and Night periods. • Operation of the Armoury building with windows open during functions with full music level such as that during a wedding. More limited levels of music (e.g. background music) would permit the Armoury windows to be opened during the Day and Evening periods.
<p>The noise mitigation strategies proposed by PKA for the planned licensed restaurant at Constables Cottage are both complex and partially specified. They involve the deployment of acoustic screens, an 'operable roof' and various timed window settings. The planned restaurant is in a highly sensitive area of the national park, less than 50 metres from beachside residences. WBA asserts that there is no comparable licensed establishment in a national park that is so close to a residential area.</p>	<p>Constables Cottage is no longer proposed to be used as a restaurant / café. Constables Cottage is now proposed to be used as short-term accommodation.</p>
<p>The prior use of the Gap Bluff site for functions has been quoted as a precedent for ongoing use. Rarely acknowledged is the high level of noise complaints which were captured in the draft PoM. To at least double the capacity for functions by expanded</p>	<p>Noted. The proposed activity has been significantly reduced in scale compared to the scheme that was exhibited in 2015. The revised Acoustic Report demonstrates that the proposal will not result in any adverse acoustic impacts.</p>

Item Raised	Proponent's Response
<p>floor space, longer operating hours and increased function frequency would certainly result in a massive increase in noise complaints.</p>	
Flora and Fauna	
<p>WBA contends that the ecological data submitted by the proponent does not provide the Minister, as the decision maker, with an adequate level of confidence in the case for this development.</p>	<p>In response to the issues raised by the public and OEH, an amended Flora and Fauna Impact Assessment has been prepared. The updated assessment provides sufficient detail to enable a thorough assessment of the proposed development.</p>
<p>Granting the lease without a publicly-exhibited Environmental Impact Statement (EIS), which includes a Species Impact Statement (SIS) as noted under section 112 (1B) of the EP&A Act may expose the Minister to legal challenge.</p>	<p>The amended Flora and Fauna Impact Assessment has conducted a series of 7-Part Tests which have determined that no EIS or SIS are required.</p>
<p>If the NPWS is intent on proceeding without a species impact statement it must, at the very least, establish that the proposed activity is not likely to significantly affect threatened species, populations or ecological communities, or their habitats. It can only do this by addressing the seven-part test and the Threatened species assessment guidelines (2007). Once this test is properly applied, the need for an SIS will be evident.</p>	<p>As noted above, 7-Part Tests have now been carried out for the proposal. The 7-Part Tests have determined that no EIS or SIS are required.</p>
<p>The proponent's report curiously concentrates only on perimeter areas adjacent to the six buildings and does not address the broader ecological impacts of a major commercial development in the national park. These factors include increased noise and light, enhanced pedestrian and road traffic movements (road kill) and off-road parking.</p>	<p>The Flora and Fauna Impact Assessment notes that noise from construction will have a temporary impact on roosting microbats, birds and mammal species. In summary:</p> <ul style="list-style-type: none"> • Lighting and noise impacts have been shown from previous studies to alter the use of habitat by microbats. Bats will respond to noise as far as 40 metres away and avoid locations with noise levels above 88 decibels. Mitigation measures to reduce the impacts of noise and lighting may be required. Work between daylight hours and limit the amount of noise pollution by regular intervals on half an hour breaks from noise. • Lights should be directed to lit facing down to the ground rather in bats flight paths (typically horizontal across the landscape). This will benefit other nocturnal species in the area. Preferably installation of LED lights or low pressure lights with longer wave lengths is recommended to minimise potential impacts on the local microbat population. • The Flora and Fauna Impact Assessment acknowledges the potential for increased car movements to result in increased road-kill, especially at night. Slow speed limits (10km/hr) will be imposed within the site. This speed limit will replace the existing 25km/hr limit.

Item Raised	Proponent's Response
<p>There are three listed threatening processes (removal of bush rock, Noisy Miner bird impacts and the introduction of non-endemic plant species) to be undertaken as part of the project. They are listed in Schedule 3 of the Threatened Species Conservation Act 1995.</p>	<p>The revised proposal does not involve any excavation of the rockface behind the Armoury.</p> <p>A Key Threatening Process (KTP) applicable to this area is 'Aggressive exclusion of birds from woodland and forest habitat by abundant Noisy Miners <i>Manorina melanocephala</i> listed as a KTP on Schedule 3 of the <i>Threatened Species Conservation Act 1995</i>. Noisy Miners prefer cleared landscapes and habitat edges. Other (more significant) native bird species are actively excluded from areas of otherwise suitable habitat, which limits feeding, breeding and dispersal opportunities and therefore ultimately population size and persistence. Planting of dense understory vegetation can help deter Noisy Miners into other areas.</p> <p>Introduction of non-endemic plant species could potentially outcompete with locally native species impacting on the ecological health of a plant community as well as increase habitat for invasive species, loss or disruption of ecological function, changes to soil biota and change soil chemistry (i.e. Lantana). KTP which fall into this category include:</p> <ul style="list-style-type: none"> • Loss and degradation of native plant and animal habitat by invasion of escaped garden plants, including aquatic plants; • Invasion, establishment and spread of Lantana (<i>Lantana camara</i> L. sens. Lat); • Invasion of native plant communities by exotic perennial grasses; • Invasion and establishment of exotic vines and scramblers; • Invasion of native plant communities by Bitou bush (<i>Chrysanthemoides monilifera</i> subsp. <i>rotundata</i>) & Boneseed (<i>Chrysanthemoides monilifera</i> subsp. <i>monilifera</i>); • Invasion of native plant communities by African Olive (<i>Olea europaea</i> subsp. <i>cuspidate</i>); • Invasion and establishment of Scotch Broom (<i>Cytisus scoparius</i>). <p>The proposal will not does not involve any of these Key Threatening Processes.</p>

Visual Impact Review

<p>The proposal does not assess the invasive visual impact of intensive parking at the Gap Bluff site.</p>	<p>The overflow parking will only be utilised during peak periods of operation - the access road could provide overflow parking for approximately 30 additional cars. However, this area is visually shielded from the main function areas and will not result in any significant or permanent visual impacts. Similarly, whilst the provision of parking on existing hardstand areas in front of the Armoury would result in some impact on outlook from the site, any impact would be temporary, and would not impact the use</p>
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Item Raised	Proponent's Response
<p>WBA believe there to be measurable visual impacts of the Gap Bluff Hospitality proposal at the subject site and from Watsons Bay at both day and night time. We do not consider that the GBH proposal satisfactorily assesses or addresses these potential impacts.</p>	<p>of the park.</p> <p>Whilst the Armoury was originally proposed as a two storey building, the scale of the building has been reduced to respond to submissions raised during the public exhibition period. Under the revised proposal, the Armoury, Gap Bluff Cottage, 33 Cliff Street, Constables Cottage and Green Point Cottage will all remain as single storey buildings. The Officers Mess will remain a two storey building, as currently exists - this is not proposed to be changed due to the heritage significance of the building.</p> <p>The photomontages that have been prepared for the proposal demonstrate that the visual impacts associated with the revised proposal are minimal. The renovated Armoury building sits within the maximum height of existing building. The deletion of the second storey means that visual impacts during the day are generally consistent with existing views of the building. Further, recessive colours and natural materials have been selected to ensure that the building sits comfortably in the existing landscaped setting. The existing vegetation will continue to be the dominant feature when the site is viewed from the Harbour. The proposed activity will not have a measurable visual impact when viewed from the harbour or surrounding park.</p>
<p>The effect would be further exacerbated by the introduction of large vehicles – buses and trucks – as required for the operation of the functions complex.</p>	<p>Servicing will take place in discreet areas adjacent to the Armoury and Officers Mess. It is not anticipated that service vehicle movements would have any sustained or significant visual impacts. Similarly, buses would only be on site temporarily to drop off / pick-up passengers. They would not be on the site for prolonged periods of time, and will not result in any significant visual impact.</p>

Item Raised	Proponent's Response
Woollahra Council	
Technical Services	
<p>Should stormwater drain off the site onto Council's Public Domain then a Stormwater Management Plan for the development is required. The Stormwater Management Plan must be in accordance with Woollahra DCP Chapter E2 – Stormwater Flood Risk Management</p>	<p>The only building subject to more substantial works is the Armoury. The footprint proposed represents a very minor increase compared to the existing building. The proposal does not seek to alter the external envelope or drainage system of any other building. The existing site stormwater infrastructures and discharge system are to be retained.</p>
<p>Council's Drainage Engineer has made the following comment with regards to Constables Cottage which may be impacted by Coastal events:</p>	<p>The existing floor level of the Constables Cottage (the lowest building subject of the proposed activity) is at 5.39mAHD. This is well above the flood planning level of</p>

Item Raised	Proponent's Response
<p>The coastal impact Flood Planning Level (FPL) for structures is 3.89m AHD</p> <p>To protect the buildings, flood compatible materials are to be used for all new construction below the Flood Planning Level (FPL).</p>	<p>3.89m AHD advised by Council. Therefore, no specific requirements for flood compactable materials to be used.</p>

Car Parking

<p>Council's Traffic Engineering Section raises concerns with regards to the traffic surveys undertaken as part of the traffic assessment as these counts were undertaken during the winter season (typically not the peak season). Council's Traffic Section also queries the relevance of the information as all new developments should be able to accommodate all parking requirements on-site or identify how the development will occur without parking on-site without impacting the local road network.</p>	<p>Updated surveys were undertaken in October 2016, including over the Labour Day public holiday, to capture data representative of peak conditions.</p> <p>The results indicate that in terms of weekday operations, traffic conditions were generally similar across both survey periods. However, the recorded traffic volumes for the peak conditions of the October 2016 Labour Day long weekend were significantly higher than the volumes recorded for the standard April 2015 conditions. This peak October 2016 survey data has been adopted for the Sensitivity Test traffic assessment</p>																																															
<p>The methodology utilised to assess the parking requirements of the proposed development is based on the Woollahra Development Control Plan (WDCP) and parking surveys of similar developments (where parking rates are not included in the WDCP). This methodology is acceptable to Council's Traffic and Transport Section.</p>	<p>Noted.</p>																																															
<p>Woollahra DCP 2015 Chapter E1 Parking and Access does not include a parking rate for function centres or restaurants. The parking rate associated with "food and drink premises" is considered the closest land use which would have similar types of parking requirements as function centres.</p>	<p>Noted. Car usage and occupancy rates have also been derived from surveys of the Orso Bayside function centre.</p>																																															
<p>Based on the WDCP the proposed Armoury Function Centre, Officer's Mess Function Centre and Constable's Cottage Restaurant would require the following parking requirements – see table below:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Proposed Development</th> <th>Dining GFA (m²)</th> <th>DCP Parking Rate</th> <th>Parking Requirement (spaces)</th> </tr> </thead> <tbody> <tr> <td>Armoury Function Centre</td> <td>447</td> <td rowspan="3">7 per 100m²</td> <td>32</td> </tr> <tr> <td>Officer's Mess Function Centre</td> <td>253</td> <td>18</td> </tr> <tr> <td>Constable's Cottage Restaurant</td> <td>196</td> <td>14</td> </tr> <tr> <td>TOTAL</td> <td>896</td> <td></td> <td>64</td> </tr> </tbody> </table>	Proposed Development	Dining GFA (m ²)	DCP Parking Rate	Parking Requirement (spaces)	Armoury Function Centre	447	7 per 100m ²	32	Officer's Mess Function Centre	253	18	Constable's Cottage Restaurant	196	14	TOTAL	896		64	<p>The table below presents the parking requirements based on Council's DCP and – for the function centre uses – based on the use-specific car occupancy rate of 3 guests per car and forecast 70% - 30% modal split (based on surveys of Orso Restaurant). Based on the revised scope of work, between 56 - 61 parking spaces are required.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">Facility</th> <th colspan="3">DCP PARKING REQUIREMENT</th> <th colspan="4">USE SPECIFIC PARKING REQUIREMENT</th> </tr> <tr> <th>Dining Floor Area (m²)</th> <th>Parking Rate</th> <th>Parking Requirement (spaces)</th> <th>Capacity (Guests)</th> <th>70% Guests arriving by Car</th> <th>Car Occupancy</th> <th>Parking Requirement (spaces)</th> </tr> </thead> <tbody> <tr> <td>Armoury Function Centre</td> <td>477.9</td> <td rowspan="2">7 spaces per 100 m²</td> <td>32</td> <td>140</td> <td>98</td> <td rowspan="2">3 guests per car</td> <td>33</td> </tr> <tr> <td>Officer's Mess Function Centre</td> <td>410</td> <td>29</td> <td>95</td> <td>67</td> <td>23</td> </tr> </tbody> </table>	Facility	DCP PARKING REQUIREMENT			USE SPECIFIC PARKING REQUIREMENT				Dining Floor Area (m ²)	Parking Rate	Parking Requirement (spaces)	Capacity (Guests)	70% Guests arriving by Car	Car Occupancy	Parking Requirement (spaces)	Armoury Function Centre	477.9	7 spaces per 100 m ²	32	140	98	3 guests per car	33	Officer's Mess Function Centre	410	29	95	67	23
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<p>The provision of off-street parking for both function centres comprises 73</p>	<p>The Gap Bluff precinct now provides 102 parking spaces consisting of 60 parking spaces</p>																																															

Item Raised	Proponent's Response
<p>permanent spaces (60 spaces for guests, 3 accessible spaces and 10 spaces for staff) and 30 informal spaces, a total of 103 spaces. The off-street parking provision of the proposed function centres meets the minimum DCP requirement.</p>	<p>for guests, 2 accessible spaces to be provided and designed for disabled users, 10 parking spaces for staff and 30 overflow parking spaces. This parking capacity would accommodate 100% of parking demands generated by the site. Accordingly, the Gap Bluff precinct provides sufficient parking to accommodate 100% of the anticipated parking demands generated by both function centres, without placing any demand on on-street parking within the wider Watsons Bay area</p>
<p>Council's Traffic Section raises concern with the staff parking allocation with the function centres and the traffic report does not give proper assessment in this regard. Overall, 38 staff will work in the function centres and café. It is considered that due to the late finishing time, a high proportion of staff is likely to travel by car and therefore may require more parking in addition to the proposed 10 staff parking spaces</p>	<p>10 formally line-marked parking spaces are proposed to the southeast of the Officer's Mess building (to be reserved for staff).</p>
<p>It is recommended that more informal parking spaces be made available to staff to reduce the likelihood of staff parking on the street. It would appropriate to approximate 75% of staff would require parking. Therefore the 10 parking spaces allocated to staff should be increased to 29 spaces.</p>	<p>1 space per 2 employees is the adopted rate. Nevertheless, the development can satisfy the 75% demand noting that there is extensive overflow parking available if necessary. Notwithstanding this, and as outlined in the draft TMP, it is proposed to prepare a Travel Access Guide for patrons and employees (Workplace Travel Plan) in order to promote alternate modes of transport and discourage private vehicle use.</p>
<p>The Constable's Cottage Restaurant does not propose any off-street parking. Based on DCP, the proposed Constable's Cottage Restaurant/Café has a shortfall of 14 parking spaces</p>	<p>Noted. Under the revised scheme, Constables Cottage will be used for short-term accommodation, and so no additional parking is required.</p>
<p>Only minor refurbishment works are proposed at 33 Cliff Street, Gap Bluff Cottage and Green Point Cottage and, as such, no additional parking provision is required</p>	<p>Noted. Under the revised scheme, Constables Cottage also only involves minor refurbishment works and will not generate any requirement for additional parking.</p>
<p>The Traffic Impact Assessment Report by Ason Group provided further analysis on the parking requirement for the proposed function centres based on surveys of a similar function centre. The surveys conducted at Orso Bayside Reception concluded that for similar sites, the guests arriving in cars account for approximately 70% and on average each car contains 3 guests.</p>	<p>Surveys were undertaken of the Orso Bayside function centre which identified a vehicle occupancy of 3 persons per vehicle. The adoption of this rate is considered reasonable for the subject function centre. Even in the absence of any surveys, application of 3.0 persons per vehicle rate would be applied. An additional survey is not considered necessary for this subject assessment.</p>

Item Raised	Proponent's Response																			
<p>It is noted that events can coincide and therefore the parking required by the development was established based on the worst case scenario when the maximum guests reach 280 at the Armoury Function Centre and 130 at the Officer's Mess Function Centre.</p> <table border="1" data-bbox="143 395 965 611"> <thead> <tr> <th></th> <th>Maximum Capacity</th> <th>70% Guests arriving by Car</th> <th>Car Occupancy</th> <th>Parking Requirement</th> </tr> </thead> <tbody> <tr> <td>Armoury Function</td> <td>280</td> <td>196</td> <td rowspan="2">3 passengers per car</td> <td>66</td> </tr> <tr> <td>Officer's Mess Function Centre</td> <td>130</td> <td>91</td> <td>31</td> </tr> <tr> <td>Total</td> <td>410</td> <td>287</td> <td></td> <td>97</td> </tr> </tbody> </table>		Maximum Capacity	70% Guests arriving by Car	Car Occupancy	Parking Requirement	Armoury Function	280	196	3 passengers per car	66	Officer's Mess Function Centre	130	91	31	Total	410	287		97	<p>Refer to response above.</p>
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Officer's Mess Function Centre	130	91		31																
Total	410	287		97																
<p>The proposed function centres for the worst case scenario will generate parking demand of 97 parking spaces. The proposed provision of 103 parking spaces on-site (63 spaces for guests, 10 spaces for staff and 30 informal spaces) does not meet the required parking demand. It is recommended that the on-site parking area be increased to 126 parking spaces (97 parking spaces for guests and 29 parking spaces for staff).</p>	<p>Council's Assessment was based on the operation of all 3 function centres with a maximum capacity of 410 people. With a 70% private vehicle usage and vehicle occupancy of 3 people per car, this results in a 97-space demand.</p> <p>Based on the revised scheme, this is no longer applicable, with a maximum / worst-case demand of 63 spaces (2 function centres) for visitors, which can readily be accommodated on site.</p> <p>Council also highlighted that 38 staff members would be present on site (equating to roughly a 1 employee per 10 visitors ratio). The known operational requirements for the development have been provided by the applicant with a maximum total of 19 staff proposed. 10 spaces are provided for use by staff on site resulting in a 50% provision of parking for staff.</p>																			
<p>Due to the high on-street parking demand, all service/delivery pick up/drop off shall be accommodated onsite. This is particularly relevant for the proposed Constable's Cottage Café where off-street parking has not been provided.</p>	<p>Noted. Constables Cottage will now be used for short-term accommodation. Servicing for the Armoury and Officers Mess will be accommodated on site, adjacent to each building.</p>																			
<p>In conclusion, the parking provision associated with the proposed Armoury Function Centre and Officer's Mess Function Centre should be increased to 126 parking spaces (97 parking spaces for guests and 29 parking spaces for staff). Alternatively, the proposed Armoury Function Centre and Officer's Mess Function Centre should be reduced in scale to accommodate its parking requirements on-site.</p>	<p>Refer to response above. The Armoury has been reduced in scale, and all parking can now be accommodated on-site.</p>																			
<p>The parking provision for the proposed short term accommodation at 3 Cliff</p>	<p>N/A - Constables Cottage restaurant is no longer proposed.</p>																			

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<p>Street, Gap Bluff Cottage and Green Point Cottage is considered satisfactory. It is acknowledged that the proposed Constable's Cottage Restaurant/Café has a shortfall of 14 parking spaces. Given the limited on-street parking availability, Council's Traffic Section recommends that the scale of development associated with the Cottage Restaurant/Café be reduced or altered (to a local café, kiosk or similar) to minimise the development's parking requirements</p>	
Traffic Generation	
<p>The Traffic Report assesses the traffic generation potential of the proposed development through the RMS Guide to Traffic Generating Developments 2002 and traffic surveys of similar developments (where traffic generation rates are not included in the RMS Guide). This methodology is acceptable to Council's Traffic and Transport Section.</p>	<p>The RMS Guide does not provide trip rate advice for function centres. Accordingly, the following trip generation analysis has been derived on a first principles basis using anticipated guest numbers expected under standard-busy operations of 235 guests.</p> <p>With reference to the modal split analysis above, it is anticipated that 70% would arrive via private cars and 30% would arrive via a combination of taxis (or private drop-offs / pick-ups) and 'mass transit', that is public transport (ferries or buses in this instance) or private mass transit (i.e. privately arranged shuttle buses or coaches).</p> <p>Notwithstanding this, it is assumed that all 71 guests that use alternative transport arrive by taxis or private drop-offs / pick-ups. This assumption provides a worst-case assessment of the traffic impacts</p>
<p>Only minor refurbishment works were proposed at 33 Cliff Street, Gap Bluff Cottage and Green Point Cottage and as such the traffic generation impact is considered minimal and can be accommodated on the local road network.</p>	<p>Noted. Under the revised scheme, Constables Cottage also only involves minor refurbishment works and will not generate any traffic.</p>
<p>In conclusion, the proposed development will generate significant traffic on the local road network, mostly associated with the proposed function centres. It should be noted however that the site is currently approved for use as a function centre which has the potential to generate a comparable amount of traffic on the road network.</p>	<p>Application of the car occupancy rate of 3 guests per car indicates that under standard-busy operations with 2 function centres in use at the same time, the Gap Bluff precinct would 'attract' the following number of cars.</p> <ul style="list-style-type: none"> • 165 guests in private cars @ 3 guests per car = 55 cars • 71 guests dropped-off / picked-up @ 3 guests per car = 24 cars <p>In terms of traffic movements, it is noted that the private cars equate to 1 pre-function vehicle movement (arrival trip) and 1 post-function vehicle movement (departure trip). However, the drop-off / pick-up movements generate 2 pre-function vehicle movements (an arrival and departure trip) and 2 post-function vehicle movements. On this basis, the following pre-function and post-function traffic generation analysis can be determined:</p> <ul style="list-style-type: none"> • 103 pre-function trips (79 arrival, 24 departure) • 103 post-function trips (24 arrival, 79 departure)

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	<p>In this regard, it is noted that all arrival trips will be via the Lighthouse Road access. The departure traffic will exit via the Military Road access. Recognising that pre-function arrival traffic is generally more intense – as the majority of guests tend to arrive just prior to a set time – compared with post-function departure traffic – which tends to depart over a wider time period – it is preferred that the pre-function traffic is managed to enter via the northern secondary access road to avoid potential congestion on the main access road at Military Road.</p> <p>In response to comments raised in submissions, a Sensitivity Test traffic analysis assesses the implication of the function centres operating on busy peak periods. Based on the traffic generation analysis above against the adopted peak existing baseline traffic of the October 2016 (Labour Day) survey data, the following table summarises the environmental capacity implications of the potential traffic generation during the critical weekend midday period.</p> <p>Table 6: Residential Amenity, Sensitivity Test Traffic Assessment</p> <table border="1"> <thead> <tr> <th data-bbox="1055 724 1563 774">Subject Road Section</th> <th data-bbox="1563 724 1935 774">Two-Way Cliff Street</th> </tr> </thead> <tbody> <tr> <td data-bbox="1055 774 1563 823"><i>Classification</i></td> <td data-bbox="1563 774 1935 823"><i>Residential Collector Street</i></td> </tr> <tr> <td data-bbox="1055 823 1563 873"><i>Environmental Threshold</i></td> <td data-bbox="1563 823 1935 873">500 movements</td> </tr> <tr> <td data-bbox="1055 873 1563 922">Background traffic</td> <td data-bbox="1563 873 1935 922">547 movements</td> </tr> <tr> <td data-bbox="1055 922 1563 971">Function Centres' traffic</td> <td data-bbox="1563 922 1935 971">(+) 79 movements</td> </tr> <tr> <td data-bbox="1055 971 1563 1021">Forecast (future) traffic</td> <td data-bbox="1563 971 1935 1021">626 movements</td> </tr> <tr> <td data-bbox="1055 1021 1563 1070"><i>Reserve</i></td> <td data-bbox="1563 1021 1935 1070">(-) 126 movements</td> </tr> </tbody> </table> <p>The analysis shows that the two-way collector street section of Cliff Street currently exceeds the goal and maximum environmental thresholds during peak weekend conditions and would be subject to 85 additional movements due to the proposed function centres. However, due to the relatively infrequent nature of these peak periods (generally limited to public holiday weekends and peak summer time weekends), the acceptability of the proposal should be assessed against the Standard Test traffic assessment, which indicates that the proposal is acceptable as it would not result in traffic volumes on the local road network exceeding RMS Guide environmental performance thresholds.</p>	Subject Road Section	Two-Way Cliff Street	<i>Classification</i>	<i>Residential Collector Street</i>	<i>Environmental Threshold</i>	500 movements	Background traffic	547 movements	Function Centres' traffic	(+) 79 movements	Forecast (future) traffic	626 movements	<i>Reserve</i>	(-) 126 movements
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Forecast (future) traffic	626 movements														
<i>Reserve</i>	(-) 126 movements														
<p>Traffic mitigation measures must be proposed and implemented by the applicant to minimise the impacts on the local road network.</p>	<p>A draft Traffic Management Plan (TMP) has been prepared. The Draft TMP outlines the key operational management principles that will be further developed in response to</p>														

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Woollahra Municipal Council's requested condition of consent for a detailed TMP.	
Traffic and Parking Mitigation Measures	
<p>Coach and bus operations have been proposed to service the proposed functions centres. It is recommended that such service be provided (per event) in line with other parking controls e.g. parking space booking system, online bus time table information and website information on minimal on-street parking availability to further discourage car dependence. The pick-up/ drop-off of any coach and bus service should occur on-site.</p>	<p>Access to the Gap Bluff precinct will continue as currently occurs. In this regard, coaches enter via the southern primary access with Military Road, unload passengers in front of the Armoury building and turn within the hardstand area adjacent to the Armoury building to exit via the main access.</p> <p>It is anticipated that the future operator of the function centres would provide a service whereby they would arrange with a coach/bus operator to service a function or event. The service could be provided at the request of a client, or the operators may offer it proactively in response to an anticipated peak use of the Gap Bluff precinct.</p>
<p>Shuttle bus services have been proposed between the Constable's Cottage and the Watsons Bay carparks, ferry terminal and the Military Road bus terminus. The shuttle bus service is strongly supported as it promotes public transport use. Pick up and drop off zones have not been discussed in the Report. The pick-up and drop-off of any shuttle bus service should occur on-site.</p>	<p>Whilst the shuttle bus is no longer required for Constables Cottage, a shuttle bus service is still being considered as a further option to increase accessibility between the function centre, Watsons Bay ferry terminal, Military Road bus terminal and identified locations located approximately 2km from the centre along Military Road during peak periods.</p> <p>An indicative shuttle bus route and shuttle bus stop locations are provided in the draft TMP.</p>
<p>Details have not been provided in terms of the entry/exit controls to Gap Bluff at the access road off Military Road, near the bus turning area. It is understood that some form of control is likely to be implemented to ensure vehicular access to be provided for guest and staff only. A queuing area shall be provided near the control point to ensure that traffic waiting to enter the site does not interrupt through traffic along Military Road. Traffic control should be implemented during peak operations to improve traffic access.</p>	<p>As noted above, Military Road will now only be used for exit movements. However, a Gap Bluff employee (as part of the traffic management solution) can be located at the access point to assist with pedestrian movements and ensure the one-way system for general vehicles is adhered to.</p>
<p>During peak hours, northbound traffic along Military Road can be delayed by right-turn vehicles waiting to enter the entrance. Additional traffic treatments on Military Road to assist vehicles turning into the site are required</p>	<p>The premise of this recommendation related to the previous scheme where the primary entry to the site was proposed via the Military Road access driveway. Under the revised scheme, all vehicles (except for the rare occasions when coach/buses are used) will only exit at this location, with vehicles entering via Lighthouse Road.</p>
<p>Considering the traffic volumes accessing the function centres, it is recommended that informal passing bays be provided on-site to accommodate two-lane two-way opposing traffic along the access road.</p>	<p>Due to the proposed changes to access arrangements, the Gap Bluff access road will now operate as a one-way road, with vehicles entering at Lighthouse Road and existing at Military Road. Nevertheless, the internal road system will operate similar to a shared zone with low speed signage and speed humps to enforce reduced vehicle speed.</p>
<p>To minimise the impact on the on-street parking and local road network during peak operating periods of the function centres (in particular Christmas period), a</p>	<p>Noted, a draft Traffic Management Plan has been prepared. The Draft TMP outlines the key operational management principles that will be further developed in response to</p>

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<p>detailed Transport Management Plan is requested to be submitted to Council's Engineering Services for approval. The plan is a control document which is to be implemented in the ongoing use of the function centres.</p>	<p>Woollahra Municipal Council's requested condition of consent for a detailed TMP.</p>
<p>There is insufficient information provided in the CMP for an assessment to be carried out. The CMP shall be prepared following Council's CMP checklist as specified below and resubmitted to Council's Traffic Section as a separate application, including:</p> <ul style="list-style-type: none"> • Detail the scope of the works to be completed including details of the various stages • Identify local traffic routes to be used by construction vehicles • Identify ways to manage construction works to address impacts on local traffic routes. • Detail the size (including dimensions), numbers and frequency of arrival of the construction vehicles that will service the site for each stage of works • Make provision for all materials, plant, etc. to be stored within the development site at all times during construction. 	<p>Noted. A more detailed CMP has been prepared to accompany the revised REF.</p>
Tree Management	
<p>The alterations and additions are to be made to the existing buildings and the direct impact on trees will be minimal.</p>	<p>Noted.</p>
<p>All of the trees impacted by this proposal are located on land owned and managed by Nation Parks and Wildlife. There are no Council-managed or privately owned trees that will be impacted by this proposal</p>	<p>Noted.</p>
Heritage	
<p>Adaptive Re-use</p> <p>The proposed uses are generally considered to be compatible with the heritage significance of the Gunnery School Group, Constables Cottage Group and Green Point Battery (Green Point Cottage). To ensure that the proposed development provides opportunity for improved appreciation of the significant use of the heritage items a Heritage Interpretation Strategy should be prepared and heritage interpretation measures incorporated into the design.</p>	<p>Noted. Gap Bluff Hospitality will prepare a Heritage Interpretation Strategy for the site, as outlined in the Mitigation Measures at Section 8 of the REF.</p>
<p>Officer's Mess</p> <ul style="list-style-type: none"> • Any roof replacement/alteration works should be based on clear documentary 	<p>Noted. Photographic evidence provided as part of the revised Statement of Heritage Impact demonstrates that the Officer Mess originally had a flat roof.</p>

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<p>and physical evidence not speculation, in accordance with Article 20.1 of the Burra Charter. In the absence of clear documentary evidence of an earlier state, the existing roof should be retained.</p> <ul style="list-style-type: none"> The detailed design should ensure that refurbishment works do not involve removal or damage to highly significant decorative features, fittings or fixtures. Detailed design should ensure that new services duct work to the kitchen is discretely located and does not read as intrusive element in views to the building. 	
<p>Gap Bluff Cottage</p> <ul style="list-style-type: none"> The proposed internal alterations to the cottage do not involve demolition or alteration to decorative features of note. The original building design will be interpreted by retention of two side rooms. New works to the western elevation, including any modifications to the verandah and its balustrade should be based on documentary evidence of an earlier state. Any new fence should be a low level timber fence, consistent with the architectural character of the cottage and based on physical or documentary evidence of the original fence if possible 	Noted.
<p>Armoury</p> <ul style="list-style-type: none"> The Armoury Building is a highly modified structure of little aesthetic significance. Major alterations to the form and character of the building would not obstruct significant views to or from the significant buildings in the vicinity or adversely affect the heritage significance of the Gunnery School Group. It is considered appropriate for the building form and character to be contemporary, given the isolated nature of the subject site. The historical significance of the buildings former use as an armoury should be interpreted in accordance with Articles 24.1 and 25 of the Burra Charter. The detailed design of the buildings should utilise materials and colours that will recede into the landscape setting. 	Under the revised proposal, the scale of the Armoury building has been reduced, and the originally proposed second floor addition is no longer proposed. The modified building will continue to be within the maximum height of the existing building, ensuring that there are no adverse impacts with respect to views, the heritage significance of the precinct, or the building's existing landscape setting. Finally, the revised proposal uses recessive colours and natural materials to ensure that the building sits comfortably in the existing landscaped setting.
<p>Constables Cottage</p> <ul style="list-style-type: none"> The Constables Cottage is graded as a highly significant element in the CMP. The existing outbuildings and rear lean-to structure contribute to that significance 	Noted. One of the key changes to the proposal is the use of Constables Cottage as short-term accommodation (a continuation of the current use) rather than a café / restaurant. As a result, the extent of works is more minor than previously proposed. The revised proposal retains the outbuildings and rear lean-to structure.
<p>33 Cliff Street</p>	Noted.

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<ul style="list-style-type: none"> The existing house at 33 Cliff Street is of no aesthetic or historical significance. The materiality of the garage and patio structure should be consistent with palette of materials found in Heritage Conservation Area, in accordance with WDCP 2015 C3.5.5 C42, C43 Detailed design of the driveway cross-over should ensure that the significant sandstone road surface is not disturbed or despoiled 	
<p>Green Point Cottage</p> <ul style="list-style-type: none"> The width of the proposed opening between the lounge and enclosed verandah should be reduced to facilitate retention of as much of the wall and window opening adjacent to kitchen as possible, to ensure that the works are in accordance with Policy 9.3.5 of the CMP, which requires that new work reflect the original design concept and spatial arrangement. The fenestration pattern of the South Elevation should be vertically proportioned, with any new doors similar in width to the proposed bi-fold doors on the West Elevation, to comply with WDCP C3.5.5 C45. Consider replacing the existing fence with a painted timber paling fence, consistent with the architectural character of the cottage 	<p>The proposed works to Green Point Cottage include the removal of walls to kitchen, lounge, bathroom and enclosed verandah to create an open plan lounge / kitchen / dining area. The conservation policy for Green Point Cottage states: "...limited alterations are acceptable to improve amenity... any change should be based on the historic plan and the original layout should be interpreted in the fabric." The proposed works will have some negative heritage impact by altering the internal layout. To mitigate the negative heritage impact of the proposed works, it is proposed to retain nibs of walls and bulkheads to the ceilings. This approach will benefit the interpretation of the walls proposed for removal between the original cottage and the enclosed verandah.</p>
<p>Historical Archaeology and Aboriginal Heritage</p> <p>Where feasible and appropriate any archaeological relics uncovered by the works should be retained on site and displayed for public appreciation.</p>	<p>Noted.</p>
<p>Acoustic Assessment</p>	
<p>A minimum of seven days unattended noise monitoring should be conducted at the monitoring locations, unaffected by weather and extraneous noise in order to encapsulate the Daytime, Evening and Night time ambient noise levels.</p>	<p>Noted.</p>
<p>Constable Cottage</p> <p>Constable's Cottage is to be used as a café and a dining area following its refurbishment. The main sources of noise within the internal or external spaces of the Constables Cottage will be human voices and amplified music (such as DJs or recorded music).</p>	<p>Constables Cottage will now be used for short-term accommodation and so acoustic impacts will be comparable to those assessed for 33 Cliff Street, Gap Bluff Cottage and Green Point Cottage.</p>
<p>The Armoury</p> <p>Health Services section agrees with the noise control measures detailed in the acoustic report (dependent on verification of ambient noise levels). The alterations</p>	<p>In addition to the recommendations of the cumulative assessment (outlined below) the following operational controls will need to be enacted to ensure compliance with the acoustic criteria:</p> <ul style="list-style-type: none"> Management controls to ensure windows are closed when hosting functions with

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<p>to the building will allow the opportunity to upgrade the envelope of the building with the following to be incorporated during the design detail stages:</p> <p>In addition to the above noise mitigation measures, Health Services section comments that the following noise mitigation measures should also be taken into consideration with the redevelopment of the Armoury building:</p> <ul style="list-style-type: none"> • Consideration being given for all service delivery vehicles to the Armoury building being restricted to the hours of 8am to 5pm daily to minimise the potential for adverse noise impacting upon nearby residential receivers. • Consideration being given for all trade waste collection to occur during daytime hours only; for this reason sufficient trade waste storage receptacles shall be provided on the site to accommodate collection for daytime hours. • Consideration being given for a glass bottle crusher to be installed in the trade waste storage area or in an appropriate place within the building to reduce and recycle all glass bottles to negate the need for waste contractors to sort glass bottles on site during collection. Any proposed glass crushing systems, all individual parts such as casings, funnels and chutes are to be lined with noise-absorbent matting or alternatively the crushing system being situated in a single location and construction of a noise-absorbent wall around the system. • The Gap Bluff Hospitality P/L Operational Plan of Management – Exhibition Draft June 2015 being adopted by the licensee to minimise disturbance to the neighbourhood. A copy of the Operational Plan of Management is to be maintained at the licensed premises. • No music, entertainment, loudspeakers, amplified equipment, relay or other audio equipment must be played, installed or used in the proposed outdoor terraces. • All mechanical plant is to be designed and selected on the basis that if the equipment could operate at any time of the day and night, the cumulative noise emission component, when measured at the nearest boundary of any residential property must not be audible. 	<p>music.</p> <ul style="list-style-type: none"> • Service vehicle, bottle and garbage collection to be limited to the Day period. Where it is required for the collection of bottles or rubbish during the Night period (e.g. after a function), collection must occur with all doors and windows closed. Disposal to outdoor bins must only occur in the Day period. • Gap Bluff Hospitality staff to be trained to limit unruly and loud behaviour within the premises and in transit to transport at the cessation of events, notwithstanding training as required under Responsible Service of Alcohol Legislation. • The awning windows to the Armoury Building to be closed at all times after 10 pm. The awning windows will also need to be closed during the daytime and evening hours during functions with music (see compliant scenarios above). • All sound locks must be design and operated such that there at least one door set closed at any time during patron entry and exit.
<p>Officers Mess</p> <p>Health Services section agrees with the noise control measures detailed in the acoustic report (dependent on verification of ambient noise levels). The alterations to the building will allow the opportunity to refurbish the internal spaces and replacement of the existing roof / ceiling structure, with the following items to be incorporated during the detailed design stages.</p>	<p>Refer to response above.</p>

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<p>In addition to the above noise mitigation measures, Health Services section comments that the following noise mitigation measures should also be taken into consideration with the redevelopment of the Officers Mess building:</p> <ul style="list-style-type: none"> • Consideration being given for all service delivery vehicles to the Officers Mess building being restricted to the hours of 8am to 5pm daily to minimise the potential for adverse noise impacting upon nearby residential receivers. • Consideration being given for all trade waste collection to occur during daytime hours only; for this reason sufficient trade waste storage receptacles shall be provided on the site to accommodate collection for daytime hours. • Consideration being given for a glass bottle crusher to be installed in the trade waste storage area or in an appropriate place within the building to reduce and recycle all glass bottles to negate the need for waste contractors to sort glass bottles on site during collection. Any proposed glass crushing systems, all individual parts such as casings, funnels and chutes are to be lined with noise-absorbent matting or alternatively the crushing system being situated in a single location and construction of a noise-absorbent wall around the system. • The Gap Bluff Hospitality P/L Operational Plan of Management – Exhibition Draft June 2015 being adopted by the licensee to minimise disturbance to the neighbourhood. A copy of the Operational Plan of Management is to be maintained at the licensed premises. • No music, entertainment, loudspeakers, amplified equipment, relay or other audio equipment must be played, installed or used in the proposed outdoor area. • All mechanical plant is to be designed and selected on the basis that if the equipment could operate at any time of the day and night, the cumulative noise emission component, when measured at the nearest boundary of any residential property must not be audible. 	
<p>33 Cliff Street Health Services section proposes a number of noise control measures in the management of the premises in order to mitigate and control noise from internal and external spaces:</p> <ul style="list-style-type: none"> • Preparation of House Management Plan & House Rules detailing occupants and visitors responsibilities of orderly conduct with no disturbances to neighbours, including policies regarding alcohol, excessive noise, parties and other anti-social behaviour. 	<p>Noted. The applicant is willing to prepare a House Management Plan & House Rules for 33 Cliff Street.</p>

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<ul style="list-style-type: none"> The new outdoor deck area or any other part of outdoor areas shall not be used between the hours of 10pm to 8am daily. Strictly no alcohol is permitted to be consumed on the premises. No visitors shall be permitted on the premises between the hours of 10pm and 8am daily. No music, loudspeakers or amplified audio equipment is permitted in any outdoor area of the premises. 	
<p>Traffic and Parking</p> <p>Health Services section comments that the following noise mitigation measures should also be considered with regards to traffic and parking noise:</p> <ul style="list-style-type: none"> The development of a Carpark Plan of Management to control and mitigate noise from vehicle parking, departures and traffic flows on public roads. Consideration of carpark surface to preclude tyre squeal. Consideration of an effective noise barrier by way of screen walls or planting of established dense foliage to mitigate sound propagation from the carpark to residential receivers. Consideration of varying speed limits for vehicles for daytime and nighttime use. Reducing capacity of carpark and regulating times of use. 	<p>Noted. The applicant is willing to prepare a Traffic Management Plan (TMP) to control and mitigate noise from vehicle parking, departures and traffic flows on public roads. A draft TM psi provided at Appendix B of the REF.</p>
<p>Cumulative Noise Assessment</p> <p>The predicted cumulative noise impacts from both function centres will adversely impact upon residential receivers unless noise controls and use restrictions are in place. Health Services comments that consideration should be given to:</p> <ul style="list-style-type: none"> Only one function centre to operate at any one time; perhaps a day function followed by an evening function with acoustic controls in place as previously commented upon for the Armoury building and the Officers Mess building. Discouraging the occupation of outdoor areas and prohibiting the consumption of alcohol in outdoor areas where patron noise may affect the amenity of nearby uses. Restricting the operating hours of the proposed function centres to daytime use only with the use of outdoor areas; or alternatively restricting the operating hours for the proposed function centres to night time use only with no use of the outdoor areas. Reduce patron capacity of function centres where noise criterion could possibly be achieved. The provision of additional noise mitigation strategies and provision of plan of management for dual use of function centres. 	<p>In response to the submissions received during public exhibition, the scale of the development has been reduced. The Armoury is now only a single storey building, and so the capacity of the building is significantly reduced.</p> <p>Modelled scenarios in the revised Acoustic Report reflect combined noise output from concurrent functions in the Armoury and the Officers Mess.</p> <p>Noise breakout from the Armoury and Officers Mess function centres was considered for a range of operational scenarios. Compliance is demonstrated for the following operations allowing for the acoustic upgrades and scenarios in Section 6.0 of the Acoustic Report:</p> <ul style="list-style-type: none"> Functions with music in all rooms during Day, Evening and Night (up to midnight), all windows closed. Outdoor ceremonies during the Day period. Indoor functions in the Armoury building with limited music, windows open, outdoor ceremony, function in Officers Mess with windows closed, Day period only. Indoor functions in the Armoury building with limited music, windows open, functions in Officers Mess with windows closed, Day and Evening periods only.

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	<p>The following operations are not compliant.</p> <ul style="list-style-type: none"> • Outdoor ceremonies during the Evening and Night periods. • Operation of the Armoury building with windows open during functions with full music level such as that during a wedding. More limited levels of music (e.g. background music) would permit the Armoury windows to be opened during the Day and Evening periods.
Food Fumes	
The design, construction and installation of any proposed kitchen exhaust systems shall comply with the requirements of Appendix E, Kitchen Exhaust Hoods of AS 1668.2-1991.	Noted. This requirement can be accommodated into the detailed design of the development.
The ductwork serving any proposed commercial kitchen exhausts shall be arranged vertically with a discharge velocity of not less than 5 m/s and be situated at least 1 m above the ridge of a pitched roof of a building	Noted. This requirement can be accommodated into the detailed design of the development.
Consideration should be given to the preparation of a Smoke and Odour Impact Assessment Report detailing filtering systems to be incorporated into the design of any proposed kitchen exhaust systems.	It is considered that compliance with AS 1668.2-1991 would adequately address this requirement. Further, the proposed development has been reduced in scale, and Constables Cottage is no longer proposed as a café. As a result, all cooking activities will now be limited to the Officers Mess and Armoury, reducing any potential odour impacts on neighbouring residents.
Regular maintenance of any odour control units and filtering systems.	Noted.
Light Pollution	
<p>Consideration should be given to:</p> <ul style="list-style-type: none"> • Installing sensor switches on outside lights. • Locate lights as far as possible from neighbours and away from sensitive areas. • Avoid placing lights near a reflective surface. • Wherever possible, direct light downwards to illuminate the target area; if there is no alternative to up-lighting, fit shields and baffles to help keep spill light to a minimum. • Sign-lighting should preferably be aimed down on signs-not upwards. 	<p>Whilst the Armoury and Officers Mess will be illuminated at night, lights will face downwards, not outwards, and will be as focused as possible to ensure that light spill is kept to a minimum. External lighting at night would not result in any significant adverse impacts on surrounding residences.</p> <p>Additional details around lighting will be provided within the Construction Assessment Procedure should the REF receive approval to proceed to that stage.</p>
Open Space and Recreational Planning	
The proposal for Gap Bluff, in addition to recent NPWS onsite improvements, will encourage more visitors to the area.	Noted. The proposal is intended to improve public access in and around the precincts.
The Foreshores Plan of Management is applicable to Gap Park and Camp Cove	Noted. Public access arrangements will either remain as they currently exist, or will be

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<p>Beach. The proposal by National Parks and Wildlife Services is in line with the management objectives in the Plan of Management including 'Expand public access to foreshore lands, by promoting and increasing access to existing areas'.</p>	<p>improved. Specifically, public access to the land within the Gap Bluff Precinct (i.e. around the Armoury and Officers Mess) will be maintained. Further, public access to several buildings will be significantly improved – Gap Bluff Cottage and 33 Cliff Street will be available for use as short-term accommodation for the first time. Overall, the proposal will not result in any loss of public access, and in some cases will significantly improve public access to the buildings and surrounding area.</p> <p>The revised proposal will result in significant improvements to public access by:</p> <ul style="list-style-type: none"> • Enabling complimentary community use of Officers Mess or Armoury on up to 10 occasions per year; and • Hosting an annual Community Open Day to Constables Cottage, 33 Cliff Street, Green Point Cottage and Gap Bluff Cottage.
<p>Council's Open Space and Recreation Planning team are supportive of the proposal as it will increase activation of Council's Parks in Watsons Bay, including Robertson Park, Gap Park and Camp Cove Beach. The proposal is thought to be complimentary to Council's Parks.</p>	<p>Noted.</p>
<p>Council would request improved signage to identify the land as NPWS owned.</p>	<p>Noted.</p>
<p>Council would be open to working with NPWS on a wayfinding strategy for the Watsons Bay Precinct to assist visitors with navigating the area.</p>	<p>Noted.</p>
<p>Council is appreciative of NPWS commitment to suicide prevention and continuing to provide a location to house the CCTV equipment. The cables for the system and the cabinet are currently in the location below highlighted in red. To move this cabinet it is anticipated that the cables will need to be extended. Council would like to avoid moving the cabinet and would request further discussion around its final location. Further to this, Council will need the CCTV contractors on site to assist with the movement of the equipment.</p>	<p>Noted. The retention of anti-suicide equipment has been a key consideration in the design of the Officers Mess. Gap Bluff Hospitality would be willing to engage in further discussions with Council during detailed design.</p>
<p>The addition of a café in this location will provide a complimentary service to beach goers and visitors in the area. It is expected that this will increase the patrons in the Camp Cove area, it is requested that NPWS improve the access from the beach to the NPWS toilet adjacent the proposed café/restaurant. The wooden stairs in this location are adequate with the current patronage however work will need to be undertaken to cater for the proposed increase in visitors.</p>	<p>In response to concerns raised by the community, Constables Cottage is no longer proposed to be a restaurant. Constables Cottage will now retain its existing use as short-term holiday accommodation. As a result, the existing access and toilet facilities are considered adequate.</p>

Compliance

Item Raised	Proponent's Response
An application for an On-Premise licence with catering service authorisation to support the proposed activities to be conducted at the Officers Mess and The Armoury is to be lodged with the Independent Liquor & Gaming Authority.	Noted. The retention of anti-suicide equipment has been a key consideration in the design of the Officers Mess. Gap Bluff Hospitality would be willing to engage in further discussions with Council during detailed design.
The comprehensive Plan of Management is satisfactory in terms of noise control, procedures regarding the responsible service of alcohol and minimising disturbances to the amenity of the neighbourhood.	Noted.
There have been no disturbance complaints to Council over the past 5 years in relation to the operation of the function venues. However, as Council is not the regulating Authority for Crown Land, complaints may have been directed to National Parks and Wildlife Service or the Licensing Police.	Noted.

Item Raised	Proponent's Response
Park Management Committee, National Parks Association NSW	
Question as to how the current proposal fits in within the context of the overarching landscape plan referred to in the Plan of Management so as to reflect the cultural, natural and historic values of the location, provide interpretation and public access compatible with their conservation and the context for any adaptive reuse of buildings and infrastructure.	The landscape plan referred to in the Plan of Management relates to the preparation of a plan for the 'First Landing Place at Camp Cove' and the entrance to the park at Constables Cottage. This is outside of the scope of works. The revised scope of works for Constables Cottage now includes only minor internal refurbishments and landscaping works.
The need for a well-considered strategic business plan to ensure that these adaptive reuses proposals are viable.	Dockside Group is a successful operator, and it is anticipated that the proposed uses will be financial viable.
Concern with the conservation and appreciation of nature conservation values.	With the exception of the Armoury building, which proposes a very minor extension beyond the building's existing footprint, the activity is within the footprint of the existing buildings. The proposal will not have any adverse impacts on identified threatened flora and fauna species within the site and will not have any adverse impacts on nature conservation.
The importance of public access being retained and that public land, assets and integrity of the national park not be alienated or compromised for private purposes.	Refer to responses above. The proposed activity is considered to be consistent with the <i>Sydney Harbour National Park Plan of Management 2012</i> . The proposal will facilitate public access to, and enjoyment of, currently disused buildings and will provide a financially viable use which will facilitate the ongoing conservation of the park. The proposal will not impact or preclude public access into and around the park. The proposal will not change the way that the park is used and enjoyed by visitors.
Concern about the impact on local amenity.	Refer to responses above. The revised proposal has been carefully designed to reduce

Item Raised	Proponent's Response
	potential impacts on local amenity. The use of Constables Cottage for short-term accommodation, and the reduction in scale of the Armoury building, will minimise any impacts on the surrounding area.
Concern about the impact on traffic.	Refer to responses above.
Concern on the impact on historic values.	Refer to responses above.
Concern about the impact on noise.	Refer to responses above.
Concern about the impact on light pollution.	<p>Refer to response above. Whilst the Armoury and Officers Mess will be illuminated at night, lights will face downwards, not outwards, and will be as focused as possible to ensure that light spill is kept to a minimum. External lighting at night would not result in any significant adverse impacts on surrounding residences.</p> <p>Lighting for the short-term accommodation cottages will be consistent with lighting for a private residence. No light spill or adverse impacts are anticipated.</p>

Item Raised	Proponent's Response
Sydney Harbour Association	
Concern that the nature, scale, scope and intensity of activity envisaged by the proposal is unsuitable for the nominated park location.	Refer to responses above. The scale and intensity of the activity has been reduced to ensure that there are no adverse impacts on the park and surrounding area.
Concern that the proposal is inappropriate with the uses of the land for National Park.	As outlined above, the proposed uses generally represent a continuation of existing uses, and are consistent with uses identified for the two precincts under the <i>Sydney Harbour National Park Plan of Management 2012</i> .
Concern that the minor works are for operational purposes connected with the proposal, rather than for the protection and restoration of heritage values.	The proposal has been designed in consultation with the heritage architect NBRS Architecture. Whilst some works are proposed to improve the functionality or amenity of the buildings, or to develop facilities that are in keeping with modern expectations, overall, the proposal will result in a positive conservation outcome for the site, and will not result in any significant adverse impacts to the site's heritage significance. Notably, the proposal no longer considers significant works to Constables Cottage.
Concern about the impact of increased traffic on fauna. This may increase the amount of roadkill on these roads.	Refer to response above. The Flora and Fauna Impact Assessment acknowledges that increased car movements, especially at night, could result in increased road-kill. Slow

Item Raised	Proponent's Response
	speed limits (10km/hr) will be imposed within the site. This speed limit will replace the existing 25km/hr limit.

DISCLAIMER

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