

**EXPERT ADVICE REVIEW PAPER:
REMOVAL OF MIDDLE HEAD TIMBER BARRACKS, 10
TERMINAL PRECINCT**

Prepared for Sydney Harbour Federation Trust

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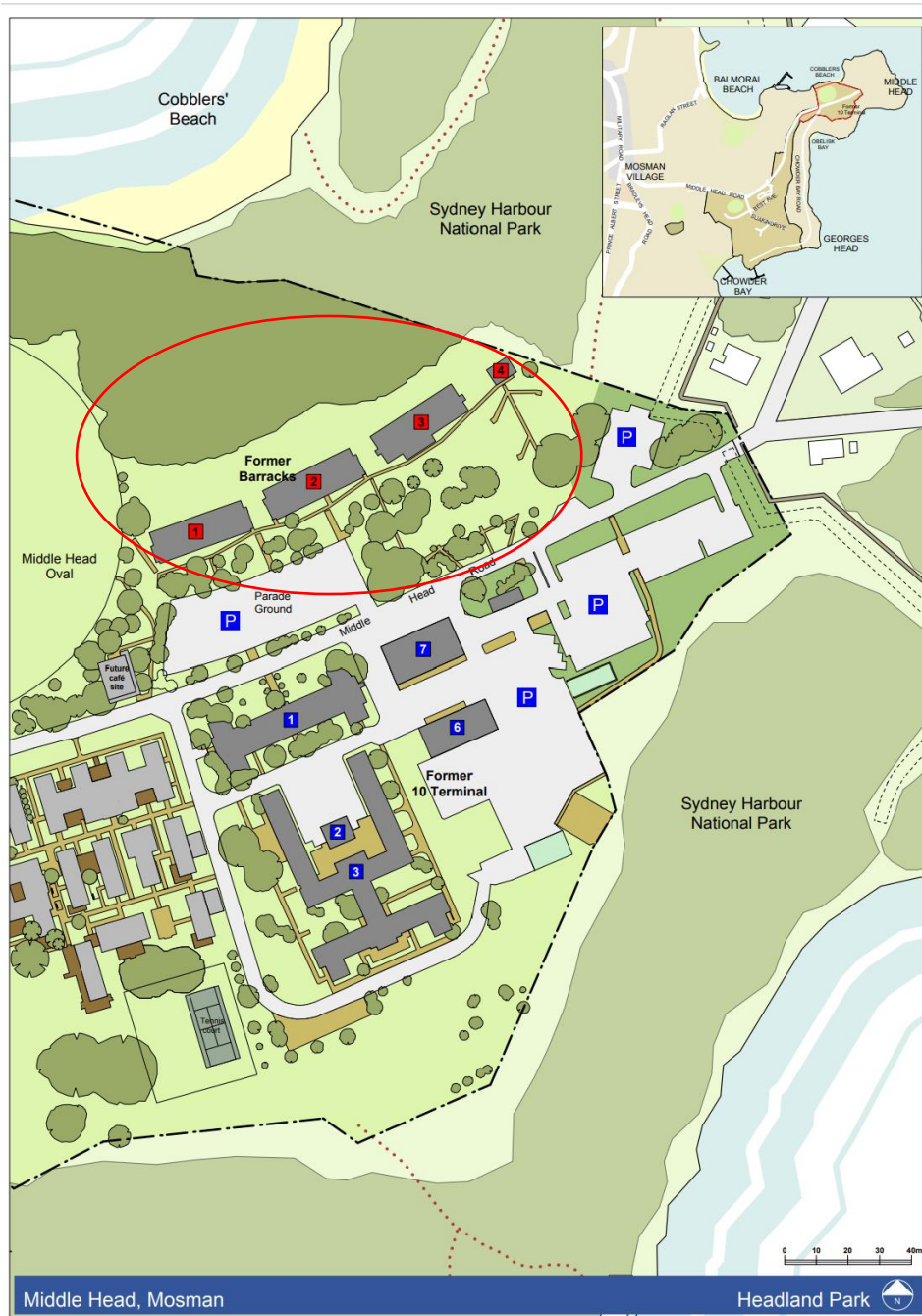


August 2023

1. Background

This review report responds to the proposal by the Sydney Harbour Federation Trust (the Trust) to remove the three 2-storey timber barracks buildings (identified as B1, B2 and B3) and the laundry/wash house (B4) on the northern side of Middle Head Road. For the purpose of this report the four buildings (B1, B2, B3 and B4) will be referred to collectively as 'the buildings'. The subject buildings are circled in red in the plan below.

The Trust is the owner and management authority for the subject lands.



SOURCE: SYDNEY HARBOUR FEDERATION TRUST

The timber barracks buildings and laundry ('the buildings') were constructed in the early 1950s and have attracted community interest and engagement for some years.

The Harbour Trust's Comprehensive Plan was made in 2003 and remains current. The 2003 Plan's identified outcome for the buildings is that Buildings B1, B2 and B3 are 'retention to be reviewed', while Building B4 was 'to be removed'. The Plan allows for the buildings to be adapted or removed – one concept involves the removal of the central barrack (B2) while adapting the flanking buildings (B1 and B3) for visitor facilities.

This was reflected in the Harbour Trust's more detailed Management Plan for Middle Head, made in 2007. This Plan was updated in 2014, and again in 2017 with this version serving as the current Management Plan. The 2017 Plan identifies B2 and B3 for removal, while B1 may be either removed, adapted or replaced for a sports pavilion. Under the 2017 Plan, B4 may be removed or adapted for amenities or a kiosk.

More recently, the proposal to remove the buildings was included in the Trust's draft Master Plan (March 2023) for Middle Head / Gubbuh Gubbuh that was exhibited between 14 March and 9 May 2023. The findings of the consultation process were published in a Consultation Outcomes Report. A number of community submissions questioned and opposed the Trust's intention to demolish the buildings, among other actions. Equally there was support expressed for the proposal to remove the buildings. Subsequent to this feedback, and the consultation report, the draft Master Plan has been revised with amendments to a number of proposed actions. However, the proposal to remove the buildings remains as a key action in the Revised Draft Master Plan (August 2023).

The Trust has undertaken further research to ensure due diligence in any final decision on the demolition of the buildings. Any proposal to proceed with demolition may be subject to a separate statutory referral under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The additional research commissioned is:

- Heritage Impact Assessment by Lucas Stapleton Johnson and partners, June 2023
- Structural Condition Report by Richmond and Ross Consulting Engineers and Project Engineers, 22 May 2023
- Blackash Bushfire Consultants – Middle Head – Bushfire Considerations Barrack B1, 19 June 2023
- Compliance and Building Code Audit (NCC 2022) by Trevor R Howse, June 2023
- Ecological Constraints Assessment by Narla Environmental, July 2023.

The purpose of this review is to bring together the relevant documentation – including the more recent research – and to provide an independent opinion of the proposal to proceed with the removal of the buildings.

The review has more broadly addressed:

- Statutory Documentation
- Relevant heritage studies and reports into the precinct and barracks buildings and laundry
- Archaeological Reports in relation to the zone and immediate surrounds to the subject buildings
- The revised (2023) and two earlier versions of the Heritage Impact Assessment.

- The Revised Draft Masterplan (August 2023).

A full list of documents reviewed is provided in Appendix 1.

It is noted that these reports and plans include comprehensive and accessible descriptions of place, histories, graphics, heritage values and statutory matters, among other discussion. This material is not repeated here. As such, this review should be read in the context of the listed documentation.

Exclusions

It is not the purpose of this document to review the processes undertaken to date in the compilation of reports and of the Draft Master Plan/s, nor to respond to specific concerns expressed in the consultation. Community submissions have not been reviewed comprehensively. No new research has been undertaken as part of this review.

2. The Place

Middle Head / Gubbuh Gubbuh is a nationally significant land parcel overlooking the entrance to Sydney Harbour. The lands have been home to First Nations people for millennia. It is a first place of early colonial contact with First Nations people. In the early days after colonisation, the emerging colony of New South Wales and the infant city of Sydney utilised the natural vantage of Middle Head / Gubbuh Gubbuh for Australia's earliest defensive fortification, and continued to do so into the 20th century (noting there are still some elements in use for military purposes today).

In both the First World War and Second World War, Middle Head / Gubbuh Gubbuh played a key part in the defence of Sydney and Australia more broadly, hosting various military functions. The Australian Army maintained position on Middle Head / Gubbuh Gubbuh until the 1990s and the Royal Australian Navy maintains position at HMAS Penguin to date.

In heritage terms, Middle Head is considered to evidence significant Ecological, First Nation, Colonial and Military heritage values.

3. Proposals to remove the buildings

Noticable within the documentation is that there is at least a 20-year discussion on the potential removal of one or all of the buildings. While the length of time does not presuppose that the proposal is valid, rather it supports that the action has a history of consideration, discussion, consultation and potential for feedback and review. It is not ill-considered as a potential action, and has been proposed within a transparent, statutory and planned context. The main references are contained in the Table below.

Removal of Buildings – Strategic Plans	
2003 Comprehensive Plan (Current)	<ul style="list-style-type: none"> • Plan p. 121 identifies B1-B3 as 'Remove or adapt barracks'. B4 is identified as 'Building to be removed'. • The Plan includes a concept for the removal of the central barrack building to open panoramic views over Middle Head, whilst

	allowing the remaining structures to be adapted for park visitor facilities.
2007 Middle Head Management Plan	<ul style="list-style-type: none"> • Buildings B1 – B4 identified as ‘Building retention to be reviewed’ • ‘Possible adaptive reuse, or demolition of one or more buildings’ • Possible uses include ‘visitor accommodation, education, offices, studios and similar’ • The 2003 concept is referenced, as well as a variation: removing B3 to ‘open up the parkland towards the fortification and defensive ditch of Middle Head’. • B4: ‘may be removed or used for amenities or as a kiosk’
2014 Middle Head Management Plan (Amendment 1)	<ul style="list-style-type: none"> • Buildings B1 – B3 identified as ‘Remove buildings and replace with landscape and paths’. • B4 ‘may be removed or used for amenities or as a kiosk’.
2017 Middle Head Management Plan (Amendment 2) (Current)	<ul style="list-style-type: none"> • B2 and B3 identified for removal. • B1 may be either removed, adapted or replaced for a sports pavilion. • B4 may be removed or adapted for amenities or a kiosk. • The barracks will be demolished, with the possible exception of Building B1, and replaced with landscaped parkland including lookouts and paths. Removal of these buildings will open up the parkland towards the fortification of Middle Head, as well as views to Middle Harbour. The barracks building closest to the Oval (Building B1) could potentially be adapted or rebuilt for the purpose of a relocated sports pavilion.
10 Terminal Parklands and Renewal project - Project Direction 2020	<ul style="list-style-type: none"> • ‘Timber barracks: demolish and relandscape as public parkland’. • Included photomontage: ‘Barracks removed to create new parkland with views over Middle Harbour’.
Draft Masterplan (March 2023) Exhibited	<ul style="list-style-type: none"> • Support for initial design response actions, including removal of timber buildings, relocation of the oval’s facilities, reconfiguration of the oval and creation of welcoming entry conditions. • selectively remove some of the less significant landscape elements within the former bases to reveal views of the surrounding waterways and headlands, and to improve the clarity of the setting of each of the elements that make up the site and its history: the fortifications, the timber buildings, ASOPA and former golf clubhouse.

	<ul style="list-style-type: none"> • New public open space lookout over Middle Harbour: Removal of the existing timber buildings and alteration to the existing adjacent car park enables this action • Activate the southern portion of Building 3 and courtyard: Removal of the existing timber buildings and alteration to the existing adjacent car park enables this action. • Ecological conservation and regeneration of lands: The existing timber buildings (proposed for removal) occupy a parcel of land that is considered highly sensitive in terms of natural values of place. • Master planning proposes that the timber buildings are removed.
Revised Draft Masterplan (August 2023) Proposed for exhibition	<ul style="list-style-type: none"> • Proposed removal of existing structures to create natural public domain with curated First Nations walk and outlook to the Harbour. • The below are considered to be consistent with the 2017 Management Plan, which is a statutory plan - <ul style="list-style-type: none"> ○ allow some buildings to be modified or removed ○ selectively remove some of the less significant landscape elements within the former bases to reveal views of the surrounding waterways and headlands, and to improve the clarity of the setting of each of the elements that make up the site and its history: the fortifications, the timber buildings, ASOPA and former golf clubhouse. • The existing timber buildings (proposed for removal) occupy a parcel of land that is considered highly sensitive in terms of natural values of place. • Master planning proposes that the timber buildings are removed. This key action is considered in terms of the core values of place.

4. Statutory heritage listings

The primary statutory control on the heritage values of Middle Head arises from the status of the land as Commonwealth owned, and the formal assessment of values for various Commonwealth Heritage Listings.

All 'actions' on Trust land (as Commonwealth property), whether undertaken by the Harbour Trust, on behalf of the Harbour Trust or another party, are controlled by the *Environment Protection and*

Biodiversity Conservation (EPBC) Act 1999 as amended. This extends to actions on adjoining land that may have a significant impact on the environment.

It is important to note that the EPBC Act provides a broad definition of ‘the environment’ to include: (a) ecosystems and their constituent parts, including people and communities; and (b) natural and physical resources; and (c) the qualities and characteristics of locations, places and areas; and (d) heritage values of places; and (e) the social, economic and cultural aspects of the matters mentioned in (a), (b) or (c) above. The consequence is that any decisions made in managing the land are required to take into account a wide range of matters.

In particular for this discussion, the EPBC Act requires the Trust to have regard for the Commonwealth Heritage values of a place before it takes an action and to minimise the impact that the action might have on those values.

The Middle Head precinct is not only a Commonwealth-government owned place, it is also included on the Commonwealth Heritage List. The Commonwealth Heritage List is established under the EPBC Act and comprises natural, Indigenous and historic heritage places – noting these categories can be shared within one place. To be included on the Commonwealth Heritage List a formal nomination is required, with an assessment undertaken by the Australian Heritage Council. The Council makes a recommendation whether or not to list to the Minister with responsibility for the Environment. The threshold for the Commonwealth Heritage List is that of ‘significant heritage value’, while the National Heritage List requires that a place meets ‘outstanding heritage value’. For the purposes of this review it is noted that the statutorily assessed heritage values for the Middle Head precinct are not at the higher threshold of National Heritage Listing.

The former Defence lands at Headland Park, Mosman (which includes the Middle Head precinct), are listed under the EPBC Act as Commonwealth Heritage Place No 105541. The buildings are contained within the boundaries of this listed area. B1, 2 and 3 are identified in the listing statement under Physical Description of Place (as part of 10 Terminal Regiment), however the buildings are not included under any of the heritage criterion as being attributes contributing to that particular value. Nor are they noted in the Summary Statement of Significance.

The precinct also contains items with individual Commonwealth Heritage listings:

- “Ten Terminal Regiment Headquarters and AusAid Training Centre” as Historic Place No. 105587 on the Commonwealth Heritage List and Historic Place No. 103342 and on the Register of the National Estate. The buildings are contained within the boundaries of this listed area.

The 'Other Ranks buildings (Barracks 1, 2 and 3)' are included as attributes under Criterion A, and 'several double storey brick and weatherboard residential buildings on the north side in addition to more recent accommodation' are identified under physical description (noting a possible error in the attribution of 1959 as their construction date). The laundry building (B4) is not mentioned.

- "Military Road Framework" containing section of Cobblers Beach Road, section of Middle Head Road to the Sydney Harbour National Park boundary, and section of Chowder Bay Road to Middle Head Road as Historic Place No.105572 on the Commonwealth Heritage List and Historic Place No.103266 on the Register of the National Estate. The buildings are not contributory to this listing.

Not all structures or sites within the boundaries of each listing are necessarily of any or equal significance.

It is noted that the buildings are not heritage listed in themselves. They are included in broader listings in the place descriptions and as contributing in one instance to one criterion.

- **While the buildings are mentioned in the Description of Place for the 'former Defence lands at Headland Park, Mosman' listing, they are not specifically identified as attributes contributing to the official Commonwealth Heritage Values. The buildings are not identified in the Summary Statement of Significance.**
- **The buildings are mentioned in the Description of Place for the 'Ten Terminal Regiment Headquarters and AusAid Training Centre' listing. They are also identified among other attributes of 'particular significance' as contributing to the official Commonwealth Heritage Values under a single value, Criterion A-Processes. The buildings are not identified in the Summary Statement of Significance.**

In summary, the Commonwealth Heritage Listings do not identify the buildings as being of considerable significance in the context of the broader values of the historical and military significance of Middle Head.

5. Historic Heritage Values

Heritage values change over time. Among other considerations, this responds to the outcomes of research, new information and new understandings and perceptions of place and of attachments.

The first identified formal assessment of the heritage values of the Middle Head precinct is a Heritage Assessment carried out by Godden Mackay Logan for the Department of Defence, dated December 1998. All of 10 Terminal, including the timber buildings, are shown as having 'some' significance (as opposed to high or exceptional).

The consultants preparing the 2007 Conservation Management Plan (CMP) have reconsidered the Godden Mackay Logan 1998 assessment with the provision of new information and a broader understanding of the historical development of the place. They identify that the existing listings emphasise the significance of the military use of the site for the defence of Sydney Harbour, as well as the significance of the natural setting. They also touch on the scientific importance of the site and its role in post-contact history. Particular note is made that: 'The range of military sites and structures are important for their ability to yield information regarding the wider historical context'. They propose that a lack of detailed historical research and analysis of the physical evidence has lessened the veracity of the history and description contained within the listings and that this has meant that some areas of significance have been omitted. For the purposes of this discussion, a lack of information on timber barracks buildings is noted as a gap.

The heritage contribution of each building is elaborated in their individual Inventory Sheets, for each of Building 1, 2, 3 and 4. The assessment of heritage significance is the same for all buildings, with a Statement of Heritage Significance as follows:

The former post-World War 2 army two storey timber barrack buildings and the associated laundry building at Middle Head form an exceptionally rare collection of such barracks at a National level. No other single examples or groups have been located on National or State register lists. Building B1/2/3 of 10 Terminal is of significance as a part of the post-war phase of construction of 10 Terminal (the School of Military Intelligence) and as physical evidence of the series of permanent training facilities erected after World War 2 in Australia. Building B1/2/3 is of significance as part of a group of rare two storey timber barracks buildings. The complex of two storey timber barracks buildings is a rare survivor when compared to the military barracks buildings listed on the various national and state registers. Aesthetically the building is typical of the simple buildings built for the military and in the civilian sphere after the war.

However, the 2007 CMP Statement of Heritage Significance for the Middle Head precinct does not mention the buildings specifically as a contributory attribute, nor does the Statement of Heritage Significance provided for the School of Military Engineering (10 Terminal Regiment Precinct).

Timber buildings comparative – Heritage Impact Assessment (revised 2023)

As noted above, one of the issues raised in the 2007 CMP is the status of the timber barracks buildings as rare remaining examples of this type of structure. Two additional pieces of research have been accessed more recently through further research for the Heritage Impact Assessment for the buildings. These contribute to this discussion on rarity and are outlined in the revised Heritage Impact Assessment (2023, updated from the earlier 2022 version):

- 'Department of Defence Timber Buildings 1939 to 1945', prepared by the Department of Architecture, University of Tasmania, 1995.
- 'An Investigation of Sources Relevant to Two Storey Military Barracks of the 1950s', prepared by Terry Kass, June 2023

The 1995 study is referenced in the 2023 Heritage Impact Assessment (HIA), with comprehensive detail (noting that the 1995 document was not accessed for this review). Based on the study, the HIA concludes that Buildings B1, B2 and B3 are later examples of the type of timber buildings constructed throughout Australia during the latter half of WWII and into the Post War and Korean War periods. Seemingly based on the simple form of the 'P' hut, the two-storey timber barrack building displayed similar detailing. As with the 'P' hut, these building types appear also to have been designed to be semi-permanent structures that were quick and easy to erect and adaptable to climatic conditions as well as specific needs of the base. Further, the HIA (page 39) notes:

Although thousands of timber buildings were erected during and after WWII by the defence forces, few remain. As the numbers of personnel diminished following the war, so did the requirement to retain and maintain this range of semi-permanent structures. As such, although Buildings B1, B2 and B3 at Middle Head appear to be rare survivors of the post WWII/Korean War period of the defence forces, the absence of other surviving examples is not unexpected given that these types of buildings were never designed or intended for permanence. It should also be noted that Buildings B1, B2 and B3 are not aesthetically notable, being based on standardised designs for trussed roof timber buildings constructed in large numbers during and post WWII. Neither do the buildings represent any particular technical or architectural achievement, again, as they are based on standardised designs. They do however represent a time of pragmatic development of the Anti-Aircraft and Fortress Engineering School in the post WWII era, although this is not considered to be of historical significance.

The 2023 study – 'An Investigation of Sources Relevant to Two Storey Military Barracks of the 1950s' is not as informative. This primarily suggests that the desktop nature of the research was limiting, but a good starting point. Consequent research by the HIA consulting team, in combination with the Kass report, revealed nine potential groups of two-storey military barracks constructed in the 1950s

(although others may survive; p. 21). The majority appear to have been of brick construction. Of the comparable buildings identified, the three subject buildings at Middle Head and one building at Chowder Bay are the only weatherboard clad two-storey barrack buildings constructed in the 1950s that still survive today (p. 25).

Based on this additional research, the HIA (2023) records that the heritage values of the subject buildings relate, for the most part, to the contribution that the buildings make to the historical development of post-WWII military activities within Australia. That assessment further notes that this contribution is very low. This assessment is justified as follows (HIA 2022, p. 35):

Given that the subject buildings were only used as residential barracks and associated domestic functions and were not associated with specific or specialised military functions or operations, in our view, the contribution that the subject buildings make to the history of the military in Australia is very low ... it can be said that Buildings B1, B2, B3 and B4 are no more significant or contributory than any other defence housing buildings.

Precinct context

The HIA (page 51) further places this assessment in the context of the Middle Head Precinct:

Although Buildings B1, B2, B3 and B4 have been graded as being of Moderate significance in the Middle Head CMP 2007 and are identified as being one of a group of rare former defence buildings within the Commonwealth Heritage listing for the place, it is clear on closer examination that the subject buildings are of Little significance in the context of the historical development of the Middle Head precinct. The contribution that the subject buildings make to the history and configuration of the precinct as a whole is considered to be minor.

Condition

Although the structural reports below report further on the condition of the buildings, the heritage *values* of a place are also influenced by condition, integrity and authenticity. The HIA (2023, page 27) addresses this as follows:

In the case of the three two storey timber barrack buildings, the low level of integrity and poor condition of each building has degraded their significance. The replacement of roofing and internal ceilings, walls, cornices, skirtings and internal doors, the replacement of all windows and external doors and the removal of chimneys, means that these three buildings can no longer be considered to be authentic or intact. Given the lack of authenticity and integrity, and considering that Buildings B1, B2 and B3 are no longer in their original use (or indeed even have a compatible use), it is considered that Buildings B1, B2 and B3 are of little significance.

6. First Nations Heritage

While considerable reference to First Nations heritage, history and values are referenced throughout the reports reviewed, this review was based on minimal supporting documentation. The contact history is well described, with additional references mainly being a 2004 archaeological report (supplemented in 2006 to include the subject area) and the consultation undertaken by Yerrabingin for the 2023 draft Master Plan through a series of cultural framework workshops. Bungaree's Farm is an important part of the story of place, however it is beyond the remit of this review paper to address or study this history.

The 2004 archaeological survey found no archaeological sites or objects, and given the disturbed nature of the area noted it is very unlikely that Aboriginal cultural material would have survived the past development of the site. However the later 2006 survey identified a site closer to the buildings with high scientific (research) significance. The updated report concluded that no additional archaeological survey of the property was necessary or warranted. However, due to the possible existence of sub-surface remains, should any future earth disturbance occurs – such as demolition and removal of structures – monitoring and detailed recording should be conducted by a qualified archaeologist. Such monitoring will also ensure the protection of any non-Aboriginal archaeological material that may be present.

The draft Master Plan acknowledges that the relationship of Country has significant values for the site and that the protection of First Nations cultural heritage values is critical. First Nations oral histories from the region recall the creation of the Harbour, referring to a tide that never went out. The combination of intangible and tangible heritage engages with uses such as camping or ceremonial activities, and the sandstone outcrops that provided shelter, and evident of midden deposits. It is resource Country, rich in a variety of fish and shellfish. The presence of rock engravings adds to the Saltwater story of the place. In addition, critical feedback in terms of rehabilitation, care, healing and long-term protection of the site's ecology and natural environmental values extends to emphasis on the First Nations culturally held view of sentience and kinship with the natural environment.

7. Ecological Analysis

'The Ecological Constraints Assessment 10 Terminal Precinct and the area of the timber barracks buildings (July 2023)' notes that the site comprises of 'significant' vegetation which should be considered when preparing a draft master plan that proposes harmonious uses with these elements. The site encompasses a number of ecological elements of varying degrees of significance. These

range from connecting green infrastructure – such as wildlife corridors – and areas of the site that are deemed to be threatened and hold high conservation values.

A series of ecological constraints are identified in association with the precinct, including:

- Potential presence of Threatened Ecological Communities (TECs)
- Threatened species records (excluding species likely to have been recorded as a sporadic fly in or over the subject site, e.g. White-bellied Sea Eagle);
- Biodiversity Values Mapping (the precinct is mapped as a Moderate Constraints Area, see below).

More specifically, the area of the buildings is identified in the ecological reports as a ‘Moderate constraints area’. This acknowledges potential for future development, however development considerations may be required in terms of:

- Proximity to littoral rainforest area
- Unoccupied buildings that may provide roosting habitat for threatened microbat species previously recorded within proximity to the site
- Patches of vegetation consisting of mature remnant/planted native canopy.

The report also identified opportunities that could improve biodiversity across the precinct. The one most applicable to the buildings is that areas of greenspace can be created within the precinct utilising locally indigenous flora species to provide increased foraging resources for native species.

However, one of the greatest threats to ecological values is identified in the building compliance and bushfire requirement audit, discussed below, arising from the potential requirement to remove a large extent of significant vegetation should the barracks buildings (or any one of them) be rehabilitated for future use. Removal of significant vegetation appears necessary to meet bushfire hazard mitigation requirements. This presents potential significant threat to ecological values.

8. Non-heritage Assessments

Structural Conditions Report 2023

The assessment was limited to the visible structural aspects of the three timber barracks buildings. The report identifies that there is a mixture of construction from different timelines, with signs of replacement of various structural features. It is reported that ‘there were extensive structural defects note around the perimeter of the buildings’ and to original features (page 12).

The conclusion and recommendations based on the inspection noted (page 13):

- The failed nature of the roof drainage system and weathering of the external timber weatherboard cladding have the implication that there will be long-term water exposure to certain regions of the buildings. Long-term water exposure leads to structurally compromised structure, which was observed at some locations during inspection. It is recommended that in all regions where there is suggestion of long-term water exposure, that the structure in these areas is thoroughly investigated for any signs of structural defect and remediated effectively.
- The long-term degradation evident in some of the timber studwalls indicate that these are nearing the end of their serviceable life.
- Settled footings must be remediated to prevent adverse structural damage.
- There is exposed corroded reinforcement within concrete slabs.

No further advice is provided as to the impacts of this assessment on the future of the buildings.

Earlier and additional comments about the state of the buildings have included the inventory sheets for Buildings B1–B4 in the 2007 CMP, which note that the buildings have undergone significant modifications, and some loss of original details to each, notably of the barracks. There is some evidence of water and termite damage and generally the buildings are in fair to poor condition, but of moderate integrity.

The 2023 HIA reports the condition of the buildings based on inspection by the consultants (page 13).

- The condition of the exteriors of the three buildings is assessed as poor. The exterior paintwork is in poor condition and in some places the weatherboard planks are damaged or have been removed or patched. New openings in the face brick bases have been introduced to provide access into the underfloor areas and Building B3 has lost its external fire stairs at both its east and west elevations and some of the weatherboard is missing on its northern elevation. Across all three buildings, windows have broken glazing and have been boarded over.
- The condition of the interiors of the barracks buildings is fair to poor. Water damage is evident in each (due to assumed roof leaks), and termite damage is evident in Buildings B1 and B2. Paint is peeling to the walls of all amenities due to damp issues. Throughout each, previous Hazmat and pest inspections have resulted in large holes being made in walls, ceilings and floors which remain unrepaired.

The prior HIA version (2022, page 14) further acknowledges asbestos issues, reported in a 2014 Hazardous Building Materials Demolition Survey by Hibbs & Associates. The report noted that the first-floor ceiling spaces of Buildings B1, B2 and B3 were found to contain asbestos cement debris,

which appeared to be the remnants of the previously removed corrugated asbestos cement roofing. Other asbestos debris was located throughout the subfloor spaces of each barrack as well.

Audit Report – Fire Safety, Accessibility, and Health & Amenity Provisions

Through visual inspection this report (page 5) has identified the extent to which the subject buildings would require upgrade to meet the current fire safety, accessibility and health & amenity provisions of the National Construction Code 2022 Volume 1 (“NCC 2022”), based on a variety of potential uses.

Considerable deficiencies are identified, with the extent of works that would need to be performed to achieve prescriptive compliance for each deficiency. It is noted that, in many instances, the remedial works are significant, and would result in the near demolition of the buildings to then rebuild as prescriptively compliant.

Middle Head – Bushfire Considerations

The site of the barracks is on Bushfire Prone Land. This report examines the implications of the adaptive reuse of Barracks B1 within the context of Planning for Bushfire Protection and the Australian Standards for Construction of Buildings in Bushfire Prone Areas 2018 (AS3959). While Building 1 was addressed, the implications can be considered relevant to all three barracks structures (and to some extent reuse of the laundry building). All the buildings were constructed before the implementation of modern bushfire planning and building requirements and the report concludes (page 31):

- B1 has a significant vulnerability to bushfire impact.
- B1 construction lacks the necessary elements and design features to withstand the intense heat, ember attack, and radiant heat exposure commonly associated with bushfires.
- The poor state of the building exposes the building to all forms of bushfire attack (radiant heat, ember and direct flame contact).
- The absence of adequate fire-resistant materials, such as non-combustible cladding, tempered glass, and ember guards, further amplifies B1 vulnerability.
- the lack of appropriate building setbacks, fire breaks that provide sufficient protection, and vegetation management exacerbates the potential for rapid fire spread and the ignition of these structures.

It is stated that there would be significant threats to the lives and safety of occupants and loss of items within the building. While vegetation management may be undertaken to the north of B1 to reduce the threat to an acceptable level, the vegetation management extent is significant and should be weighed against the potential adaptive reuse of the building and the cost of upgrades to meet modern construction requirements. In addition, the report recommends that the adaptive

reuse cannot proceed without the full validation and formal agreement between the Trust and the proximate land manager, National Parks and Wildlife Service, as the extent of vegetation removal is substantial and falls within the jurisdiction of the National Park (page 4).

Recommendation 6 (page 30) acknowledges the proposal to remove the timber barracks buildings, which will reduce fire progression and provide for areas of asset protection zone. 'Given the state of the buildings and the extent of vegetation management required to provide protection, this approach is supported'.

Revised Draft Master Plan, August 2023

The overview provided in the Revised draft Master Plan (page 51), states that the buildings are beyond 'end of life' and present significant capital cost constraint in code compliance if adaptive reuse was to be considered. This includes general access provisions, fire systems and egress, access compliance to second storey, BCA Section J environmental considerations and other BCA compliance issues. In addition:

- The buildings are sheeted with asbestos and have elements of hazardous material in linings and applied coatings (e.g. lead paint) presenting significant capital cost in remediation to achieve code and standards compliance
- Bushfire presents a further constraint on use, where the buildings occupy land that is within the design to satisfy (DTS) flame zone. Considerable change to adjacent vegetation would be required if adaptive reuse (beyond non-habitable storage) was to be considered.

9. Discussion

The reports reviewed demonstrate informed and rigorous research and provide recommendations and conclusions that are made on a considered and professional basis. The decision-making has been well informed and additional rigour has been provided to address some obvious gaps in the background material.

It is the opinion of the reviewer that the assessment as to the contributory heritage value of the buildings as low is supported. It is further supported that when viewed across each of ecological, Indigenous and military values that there is minimal impact on the heritage values as a whole should the structures be removed.

The heritage values considered in the HIA relate primarily to the contribution of the buildings to the highly significant defence history of the site. However, there are other heritage impact considerations to consider, that are not addressed in the HIA. The opportunity exists with any Impact Assessment to evaluate broader trends and cumulative impacts. It is also noted that impacts can be positive.

The HIA has addressed one outcome option, that of removing the three barracks buildings. There are two alternative options.

1. The first is 'Do Nothing'. It is not surprising that little discussion has addressed this as an option as it is clearly not viable to leave the structures in their current state. However, for completeness it is important that the 'status quo' option be tabled, particularly that there are ranging negative impacts on heritage values (both natural and cultural), visitor amenity and safety, aesthetics, environment, financial resources and so on. It would also be contrary to various statutory obligations of the Trust.

Doing nothing is not a supported option.

2. The second is to rehabilitate or 'reconstruct' the buildings. There are a number of impacts that mitigate against this option, a principal one being the amount of funding and resources that would be required to restore the structures to a state where use would be feasible. The constraints include the input required to meet standards including structural engineering, environmental, fire safety and equitable access. The heritage values of the structures do not support this level of investment as a requirement for conservation alone, and there are viable alternatives for the use of the space. One of the constant challenges in heritage protection in Australia is the paucity of financial and human resources available. Faced with these limitations, the opportunity to invest available resources into conservation of other more significant heritage elements of the precinct would be a responsible heritage management approach.

The second constraint to reconstruction is the potential negative impact on ecological values arising from the significant extent of vegetation management required to meet fire safety regulations. The consultants preparing the fire report have urged that this impact – together with the cost of upgrades to meet modern construction requirements – should be weighed against the potential adaptive reuse of the buildings.

It is the opinion of this reviewer that natural heritage impacts and costs of rehabilitating the buildings support a recommendation to remove the structures.

Positive Impacts

It is not the intent to propose consequent positive impacts as support for the removal of the structures but rather to acknowledge that outcomes of that decision can be potentially enhanced through flow on benefits. These include:

Defence Heritage

- The recording work that will be required as part of the demolition process will create a more informed archive of the structures and provide information that is otherwise unavailable.
- The archaeological monitoring of the demolition will allow access to uncovered artefacts illustrating the use of the buildings and day to day items. The material that 'slips through the floorboards' can often provide a unique window on building activities and daily life.
- The interpretation proposal should provide opportunities to further research how the buildings have contributed both historically and socially. The latter – including oral histories

and stories from previous residents – can introduce a significant insight on use, daily life and activities that relate to residential associations.

First Nations heritage:

- As the land was disturbed through construction activities the potential for finds is limited, any sub-surface cultural material will be identified and protected through archaeological monitoring of the demolition and subsequent rehabilitation of the lands.
- The direct link and lookout to the harbour that will be provided can support and enhance First Nations values of place, and enable connection and interaction with the surrounding waters. This connection is critical and engages with the intent to rehabilitate and care for Country in a holistic and enduring manner.

Viewlines and Aesthetics

- Middlehead has significant views and vistas, and the removal of the buildings will re-establish a key view-line and vantage point, as well as reopening a space for different uses.

Community Heritage

This review has not engaged with the complete range of valuable and informative community feedback documents. However, it is obvious that there is both objection to and support for the proposal to remove the buildings. The former presents a range of information to endorse the importance of the structures, and the advantages of retaining them. In addition, there are a number of initiatives that can be well pursued, even in the absence of the buildings. This contribution to the decision-making process cannot be underestimated or disregarded.

It is the opinion of this reviewer that community feedback and the reinforcement of social heritage values create opportunities for knowledge collation, additional research and interpretation of the buildings. However, in considering the full range of heritage values and other circumstances the removal of the structures is supported.

Assessment under the EPBC Act

The EPBC Act stipulates that an action will require approval from the Minister if the action has, will have, or is likely to have, a significant impact on a matter of national environmental significance. Commonwealth Heritage listing (unlike National Heritage or World Heritage listing) is *not* considered a matter of national environmental significance.

However, as a Commonwealth entity the Trust must follow the guidance of ‘Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies: Significant impact guidelines 1.2. 2013’. It is expected that an action will be ‘Referred’ if it is taken by any person on Commonwealth land that is *likely* to have a significant impact on the environment.

It is the opinion of this reviewer that the proposed action to remove the buildings is *not* likely to have a significant impact on the heritage values of the place (defined as part of the environment), however a referral should be discussed with the Department of Climate Change, Energy the Environment and Water as it will allow a further level of independent assessment prior to any action being taken.

10. RECOMMENDATION

The Australia ICOMOS Charter Places of Cultural Significance (The Burra Charter, 2013) is considered the guiding document for cultural heritage management in Australia. Two principles inherent in the Charter are:

- The cultural significance of a place is embodied in its fabric, its setting and its contents; in the associated documents; in its use, and in people's memory and association with the place.
- The cultural significance of a place and other issues affecting its future, are best understood by a methodical process of collecting and analysing information before making decisions.

Article 5 provides an approach to places with multiple values:

- Conservation of a place should identify and take into consideration all aspects of cultural and natural significance without unwarranted emphasis on any one value at the expense of others.

The research and documentation provided for review has been consistent with the two Burra Charter principles above, and the recommendation under consideration to demolish the buildings has been considered in the context of Article 5.

This review finds that the evidence provided supports the proposal to remove the buildings as follow:

1. The heritage values of the buildings are minimal in terms of their contribution to the values that are identified in the Commonwealth Heritage Listings that include the Middle Head precinct.
2. In the absence of the physical structures, the heritage values of the buildings can be recognised through appropriate data collation and interpretation.
3. The condition, authenticity and intactness of the buildings are markedly compromised, and a rehabilitation of the structures will not restore the heritage values that will be impacted in the removal of the buildings.
4. The resources required to rehabilitate the buildings are extensive, and could be responsibly applied otherwise in the conservation of more significant heritage elements in the Middle Head precinct.
5. The impact on significant natural values to otherwise rehabilitate the buildings for use is extensive.
6. There will be additional benefits to both First Nations and historical heritage values.

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APPENDIX 1

DOCUMENTATION REVIEWED

- Australian Museum Business Services, Archaeological Survey of Sydney Harbour Federation Trust Land at Middle Head, Georges Heights and Chowder Bay, Mosman, NSW, June 2004 (amended 2006)
- Blackash Bushfire Consultants, Middle Head – Bushfire Considerations Barrack B1, 19 June 2023
- Cox Architecture, Middle Head / Gubbah Gubbah Draft Master Plan, March 2023
- Cox Architecture, Middle Head / Gubbah Gubbah (Revised) Draft Master Plan, August 2023
- Howse, Trevor R., Compliance and Building Code Audit (NCC 2022), June 2023
- Kass, Terry, An Investigation of Sources Relevant to Two Storey Military Barracks of the 1950s, June 2023
- Lucas, Stapleton, Johnson and Partners, Former 10 Terminal Regiment Barracks Building and Laundry: Heritage Impact Assessment, November 2022; February 2022; Supplementary Report, July 2023
- Narla Environmental, Ecological Constraints Assessment, July 2023.
- Richmond and Ross Consulting Engineers and Project Engineers, Structural Condition Report, 22 May 2023
- Robertson and Hindmarsh, Conservation Management Plan: Middle Head Sites, 2007
- Sydney Harbour Federation Trust, Comprehensive Plan, 2003
- Sydney Harbour Federation Trust, Management Plan – Mosman No.7, Middle Head 7 June 2007
- Sydney Harbour Federation Trust, Management Plan – Mosman No.7, Middle Head 7 June 2007
And subsequently amended on 16 September 2014
- Sydney Harbour Federation Trust, Management Plan Middle Head, 2017
- Sydney Harbour Federation Trust, 10 Terminal Parklands and Renewal project - Project Direction 2020
- Sydney Harbour Federation Trust, Middle Head / Gubbah Draft Master Plan – Consultation Outcomes Report

APPENDIX 2

AUTHOR

Dr Jane Harrington is a cultural heritage practitioner based in Tasmania. For 15 years she was the Director of Conservation and Infrastructure with the Port Arthur Historic Site Management Authority. She has worked in a range of government, academic and consulting roles across Victoria, NSW, Queensland, and Tasmania. She has considerable experience in the preparation and assessment of documentation for heritage listing, heritage management planning, preparing heritage impact assessments, and major project management. She has previously been a member of the Australian Heritage Council, President of Australia ICOMOS, and a member of the Australian World Heritage Advisory Committee. She is an Associate Professor at the University of Tasmania, and Adjunct Professor at Deakin University, sitting on Academic Advisory Boards for masters-level programmes at both universities. Jane has provided and continues to provide expert advice on international heritage sites and issues to ICOMOS in its role as an Advisory Body to the UNESCO World Heritage Committee, and is a member of the ICOMOS International Scientific Committees for Intangible Cultural Heritage and for Interpretation. She is a member of the Kingston and Arthurs Vale Historic Site Advisory Committee and has recently been appointed as a historic heritage expert to the Tasmanian National Parks and Wildlife Advisory Council.