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Proposed Visitor Facility at Garigal National Park

Director's Examination
April 1993

Department of Planning

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FOREWORD

This report constitutes a director's examination pursuant to section 113(5) of the Environmental Planning and Assessment Act, 1979. The report examines a proposal by Monsgain Pty Ltd to construct and operate a multi-purpose visitor facility in the Garigal National Park.

The director's examination has been undertaken at the request of the National Parks and Wildlife Service, to provide an independent assessment of the issues raised in response to the exhibition of the environmental impact statement for the proposed facility.

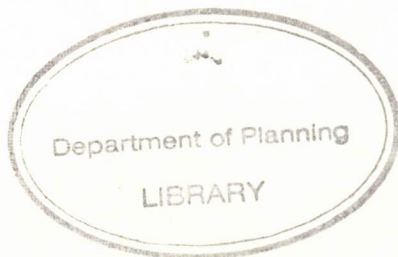
The report contains an analysis of all major issues affecting the development proposal, together with recommendations for their resolution. It will be considered by the determining authorities when deciding whether or not to approve the proposal.

Gabrielle Kibble.

G. Kibble

27/4/93.

Director of Planning



Doc 22568

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1. BACKGROUND

In August 1991, a lease was granted to Monsgain Pty Ltd to establish a visitor facility in the Davidson State Recreation Area (now Garigal National Park) on a site near the Roseville Bridge. The site is located in Warringah Shire local government area.

The visitor facility was to include a tea room/cafe, kiosk, boat storage and hire facility, interpretation centre, bike hire, public toilets and caretaker's residence. A pontoon for launching hire boats was also proposed. A clause in the lease also permitted the centre to be used for private functions.

A consent to construct the facility was issued by the President of the Davidson State Recreation Area Trust in December 1991 and work commenced in June 1992. The building has been substantially completed.

In August 1992, as a result of action taken by Ku-ring-gai and Willoughby Councils, the Land and Environment Court declared the lease and building consent to be void. It was held that the use of the centre for private functions was not permitted by the National Parks and Wildlife Act, 1974. The Court also considered that adequate consideration of the proposal's environmental impacts had not been undertaken.

The court granted an injunction restraining further work and ordered that the building be demolished. The demolition order was subsequently suspended for 12 months to allow preparation and consideration of an Environmental Impact Statement (EIS) under part 5 of the Environmental Planning and Assessment Act, 1979 (EP&A Act).

Following the court's decision, an EIS was prepared by John Brockhoff of Travers Morgan Pty. Ltd. The EIS was exhibited by the National Parks and Wildlife Service in accordance with the procedures of part 5 of the EP&A Act from 18 December 1992 to 29 January 1993. It is understood that at some locations the exhibition commenced on 21 December 1992.

Warringah Shire Council was notified of the preparation of the EIS in accordance with the requirements of State Environmental Planning Policy No.4 - Development Without Consent (SEPP 4) relating to prescribed development.

Over one hundred submissions were received in response to the EIS. Objections were principally related to visual impact, noise, access, parking, the appropriateness of the proposed development in a national park and the procedures followed for the exhibition of the EIS.

This director's examination is being undertaken pursuant to section 113(5) of the Environmental Planning and Assessment Act. Its purpose is to assist the decision-making process by providing an independent assessment of the proposed development and to clarify issues raised by objectors in their submissions.

2. THE PROPOSAL

The proposed visitor facility as described in the EIS would incorporate the following features:

cafe/tea room (including kitchen) : 245m²
kiosk : 18m²
visitor information centre : 17m²
boat/bike hire and storage area : 155m²
caretaker's residence : 115m²
public toilets : 44m²

The facility would also cater for "group functions ... incidental to the dominant use of the development as a visitor facility".

It is proposed that such functions would be associated with the legitimate use and enjoyment of the park and would be considered on a case by case basis by the park district manager.

The visitor facility is proposed to operate from 6 am to 10 pm, seven days per week. Public toilets would be open 24 hours per day. The facility would be connected to all utilities and services, including water and sewer.

A pontoon for launching hired boats (15 row boats, 10 canoes and 10 runabouts with 6 hp motors) would also be located on the adjoining waterway and would be accessed by a ramp.

3. STATUTORY CONSIDERATIONS

It is necessary to consider what approvals are required for the proposed visitor facility and pontoon. It is also appropriate to consider who are the relevant determining authorities for the proposed facility. Accordingly, it is necessary to examine:

- (i) Warringah LEP 1985;
- (ii) State Environmental Planning Policy No. 4 (SEPP 4);
- (iii) the Sydney and Middle Harbours Regional Environmental Plan (SREP No. 23);
- (iv) the National Parks and Wildlife Act, 1974; and
- (v) part 5 of the Environmental Planning and Assessment Act, 1979 (EP&A Act).

The Warringah Local Environmental Plan (1985) (LEP) zones the subject site 6(d) (National Park and State Recreation Area). Development permissible under the National Parks and Wildlife Act, 1974 is permissible on the site without the consent of Warringah Shire Council. All other development is prohibited by the LEP.

By virtue of clause 11A of State Environmental Planning Policy No. 4 (SEPP 4) development carried out on land reserved or dedicated under the National Parks and Wildlife Act 1974 as a national park may be carried out without consent, provided that the development is not prohibited.

Further, the visitor facility constitutes prescribed development within the meaning of SEPP 4. Pursuant to clause 11(A)(3) of SEPP 4, developments proposed in national parks which are likely to generate significant traffic or to otherwise significantly affect land in the locality, are required to be notified to the local council and consideration given to any matters raised by the council. Warringah Shire Council has been notified of the proposed development and has raised no objections.

The Sydney and Middle Harbours Regional Environmental Plan (SREP 23) also applies to the site. Clause 19 of SREP 23 provides that development "carried out by the National Parks and Wildlife Service" on the subject land is not prohibited or restricted by SREP 23. Clause 19 is, however, not relevant to this proposal which is to be carried out by a private company. While SREP 23 therefore applies to the site, there are no provisions which are directly applicable to the visitor facility, although design and management guidelines contained in SREP 23 should be considered when assessing the proposal.

Development consent under part 4 of the EP&A Act is therefore not required and the proposal should be considered under Part 5 of the EP&A Act.

Part 5 of the EP&A Act requires a determining authority, when considering an activity, to examine and take into account, to the fullest extent possible, all matters affecting or likely to affect the environment because of that activity.

Before a determining authority can carry out an activity or grant approval for an activity which is likely to significantly affect the environment, it must obtain or be furnished with an Environmental Impact Statement (EIS) and publicly exhibit it in accordance with sections 112 and 113 of the EP&A Act.

In accordance with part 5 of the EP&A Act an EIS has been prepared on behalf of the NP&WS and exhibited for public comment.

It is also necessary to consider who are the relevant determining authorities for the proposal. The provisions of the National Parks and Wildlife Service Act 1974 and the decision of Guthega Developments P/L v the Minister administering the National Parks and Wildlife Act 1974 (1987) 7 NSW LR 1953 (Court of Appeal), indicate that the Director of the National Parks and Wildlife Service and the Minister administering the National Parks & Wildlife Act 1974 are the determining authorities for the proposed visitor facility and any subsequent lease which is negotiated.

Whilst most aspects of the proposed development fall under part 5 of the EP&A Act, the situation regarding the assessment and approval of the pontoon is different. As the pontoon is located below High Water Mark, it is subject to the provisions of SREP 23, including the requirement for development consent under part 4 of the EP&A Act. SREP 23 makes the Maritime Services Board (MSB) the consent authority for the pontoon. SREP 23 zones the waterway in the vicinity of the site W1 - General Waterways. This zone permits a wide range of waterway activities and facilities which are generally compatible with adjoining foreshore lands.

The Maritime Services Board's Sydney Harbour and Tributaries Waterside Control Plan 1990 also applies to the proposed pontoon. The MSB has indicated that it will not withhold its landowners consent for the making of a development application for the proposed pontoon.

4. SUBMISSIONS

A total of 119 submissions were received in response to the exhibition of the EIS. Of these submissions:

- * 5 were from Government departments;
- * 4 were from local councils (Warringah Council made 2 submissions);
- * 110 were from private individuals or groups.

The appendices to this report provide a list of the authorities, organisations and individuals who made submissions.

In summary:

- * 97 individuals, groups or local councils objected to the proposal;
- * 15 individuals or groups supported the proposal; and
- * 6 authorities/local councils offered comments and advice.

Warringah Shire Council, within which area the proposed development is to be located, has no objections to the proposal, subject to the adoption of the measures specified in the EIS to mitigate the environmental impacts of the development.

The principal criticisms made by objectors to the proposal are:

- * noise likely to be generated by the development would be excessive, especially in relation to the long proposed hours of operation (6 am to 10 pm);
- * unacceptable visual impact which could not be adequately mitigated by landscaping;

- * development would create parking problems, traffic congestion and conflict between the various users of the park;
- * access to the site is poor;
- * the commercial nature of the facility and range of uses proposed is inappropriate in a national park; and
- * the timing of the exhibition period for the EIS (during the Christmas holiday period) was inappropriate and did not enable full public participation.

Submissions supporting the proposal generally considered there to be a need for such a facility in the Garigal National Park.

5. CONSIDERATION

The key issues relating to the proposal are:

- * the need for the visitor facility;
- * site suitability;
- * the permissibility of the development;
- * visual impact;
- * noise impact;
- * access and parking;
- * the adequacy of the exhibition of the EIS; and
- * the proposed sewer connection.

5.1 Need for the Visitor Facility

Garigal National Park does not have a visitor centre. Facilities currently provided in the Roseville Bridge area are public toilets and a kiosk to the west of the bridge. The kiosk provides a very limited range of food and drink, but is currently not operating. No facilities (including toilets) are provided in the boat ramp area to the east of the bridge.

The lack of a visitor centre means that there is no focal point in the park to provide information on walking tracks, boating opportunities, scenic highlights, plants, animals and aboriginal sites. As a result the park is less appreciated and less well used than if a comprehensive visitor facility was available.

There is little doubt that the provision of a visitor interpretation centre, a kiosk, and public toilets, together with a range of low-key recreational activities such as bike and boat hire, are appropriate in Garigal National Park. It can equally be argued that the provision of a caretaker's flat to safeguard what is a quite significant investment in an isolated location is justified.

Whilst a visitor interpretation centre is an important part of the proposal, it is considered that the small area set aside (17m²) for this purpose is not adequate to fulfill the role of promoting the park, especially to school and tour groups. It is considered that a larger park promotion area would enhance the public focus of the development.

The justification for a cafe/tea room of the size proposed in the EIS (100 seats) needs to be carefully considered. The EIS states that the need for a cafe/tea room, as with the other facilities described above, has been identified in a user survey conducted in 1992. This survey was based on limited data.

A number of submissions are concerned that the size of the cafe/tea room is inappropriate and that current levels of visitation do not warrant a restaurant of this size. A much smaller establishment is considered to be more appropriate.

It is clear that a cafe/tea room of the size proposed will need to attract patrons to the park in order to be viable. Existing levels of visitation would not appear to be sufficient to ensure profitability.

It is considered reasonable that the cafe/tea room attract patrons as well as catering to existing users of the park, provided it does not diminish the environmental quality and recreational opportunities of the park. The National Parks and Wildlife Service wishes to promote and increase visitation to Garigal National Park, and it is not inconsistent with this aim to provide a cafe/tea room which will attract people to the park.

It is likely that patrons attracted by the cafe will use other facilities of the park, especially given the requirement to pay an admission fee during park operating hours. Cafe patrons will, if nothing else, enjoy the visual quality of the park.

Whilst it is considered that a need for the cafe/tea room can be justified, the appropriateness of the size and seating capacity can only be established after consideration of visual, noise and parking issues. These matters are addressed later in this report and suggest that, subject to the provision of additional parking, the restriction of hours of operation and the redesign of the building, the size of the cafe/tea room as proposed in the EIS of 100 seats would appear to be reasonable. A condition of consent limiting the size of the restaurant to 100 seats should therefore be imposed in any subsequent approval.

5.2 Site Suitability

The National Parks and Wildlife Service regards the Roseville Bridge area as the most suitable site for a visitor facility in Garigal National Park for the following reasons:

- (a) The area has comparatively good access from Warringah Road when compared with other more remote locations.
- (b) The Roseville Bridge area is reclaimed land of little ecological value and is suitable for an appropriately designed and sited building.
- (c) Roseville Bridge area represents a "gateway" to the park for walking and boating activities and currently enjoys reasonably high patronage, especially on weekends.

The EIS evaluates three sites in the Roseville Bridge area for a visitor facility and concludes that the preferred site is the most suitable. This conclusion is based on an assessment that environmental impacts at all three sites are approximately comparable.

It is noted that whilst a visitor facility on the site of the existing kiosk on the western side of Roseville Bridge would be less visually intrusive than the proposed location, the practical need to locate the building close to the water and the existing ramp cannot be ignored.

It is acknowledged that the concentration of activities in the boat ramp area will increase visitation and car parking demand in that area and that there will be potential for conflict between boat ramp users and cafe patrons. It is considered, however, that this issue can be addressed through proper traffic management, the provision of additional car parking spaces and by reserving spaces for boat ramp users. These proposals are discussed in section 5.6.

Any potential conflicts in relation to the use of the waterways by boat and canoe hire as well as by the use of the park for bike hire will need to be addressed in the final design of the development.

On balance, it is considered that the selected site is appropriate subject to design and landscaping issues being addressed. These matters are discussed in section 5.4.

5.3 Permissibility of the Development

The question of the permissibility of the proposed visitor facility in a national park is fundamental and was raised in a number of submissions.

As discussed in section 2 of this report, the visitor facility is to incorporate a cafe/tea room, kiosk, visitor information centre, boat and bike hire service, caretaker's residence and public toilets. The EIS also proposes the use of the facility for functions incidental to the dominant use of the development as a visitor facility.

Whilst the question of what is and what is not permissible in a national park is difficult to resolve, it is considered that all the principal uses of the visitor facility are permissible. The position regarding the use of the facility for group functions is much less clear and will require careful consideration by the determining authorities.

The EIS indicates that requests to use the facility for functions will be assessed on a case by case basis by the park district manager. Accordingly, additional information would be required about the proposed use of the visitor facility for group functions/receptions before it would be possible to determine the permissibility of the use. In any event, it is the responsibility of the determining authority to determine the permissibility of use.

5.4 Visual Impact

The building has been substantially constructed and therefore its visual impact is able to be clearly understood.

Whilst the EIS considers the visual impact of the development in some detail, there are a number of concerns in relation to the assessment. These include:

- (a) The EIS states that the building is single storey reaching a height of 5.6m. The building as constructed is in fact over 6m high due to a 25° roof pitch, not 15° as shown on the EIS drawings.
- (b) Only the visual catchment within 500m of the built development is analysed and identified. In particular the analysis fails to identify 65 houses in Castle Cove at Nerrin Road, Willowie Road, Bampi Place and Padulla Place which have views of the development.
- (c) It is considered that the building has not been designed to integrate with its natural setting and that the design and management guidelines in the Sydney and Middle Harbours REP have not been correctly interpreted. Specifically, the large scale, hard edged, light coloured roof form is a focal element which contrasts dramatically with the rounded forms, dark colours and texture of the building's bushland setting. The "peaked roof extensions" are ineffective in breaking up the roof form and the light colour and reflective nature of the roof are inappropriate.
- (d) Proposed landscaping/tree planting will not be effective in screening the building for at least eight years and will therefore be of little short-term benefit.

From all locations the built structure is intrusive due to its size, shape, colour of roof and reflection from the roof. The roof of the building is considered to contribute most significantly to its visual impact due to its large scale, inappropriate colour and reflectivity. It is considered that the building could be substantially improved by modifying the roof line. Specific recommendations are:

- The shape of the roof be changed to a hip roof so as to reduce scale horizontally. This will reduce the length of the roof ridge from 40m to 27.5m and will provide a more recessive roof line.
- The eight peaked roof extensions be demolished as they are ineffective and incompatible with a revised roof form.
- The colour of the roof and all painted finishes be revised to provide a darker colour in harmony with the colour of the surrounding environment. Reflectivity be reduced through the use of a new roof material or repainting the existing roof in slate grey or similar colour.

More significant changes to the structure of the building could be made, however it is not considered that these would greatly enhance the building, nor would they be cost-effective. Demolition of the building is not favoured as it is considered that the building performs a legitimate function and that its visual appearance can be enhanced to an acceptable level by the suggested modifications to the roof.

It is also considered that the appearance of the building would be improved by a better landscaping concept than that proposed in the EIS. Tree species to be selected should be endemic and should achieve both short term rapid growth e.g. Casuarina/Acacia with clump planting and longer term slower growth of shade canopy species e.g. Port Jackson Figs. The use of grass and shrubs should be restricted in the design.

Should it be decided to proceed with the modifications as proposed, it is recommended that a qualified and experienced architect and landscape architect be employed to redesign the development and prepare a revised building design, site plan and landscape design.

5.5 Noise Impact

The proposed visitor facility is located in a valley and is overlooked by the residential suburbs of East Roseville, Castle Cove and, to a lesser degree, Killarney Heights. The potential for noise generation in this setting needs to be carefully addressed.

Concerns have been raised in submissions regarding the noise likely to be generated by the development, especially from the cafe/tea room and private functions. The proposed hours of operation of the facility, from 6 am to 10 pm, are opposed in a large number of submissions.

The EIS provides a limited assessment of the current acoustic environment and the likely noise impacts of the proposal.

The likely noise impacts of the proposal as discussed in the EIS have been reviewed by the Environment Protection Authority (EPA). The EPA has assessed the proposal on the basis of the data provided in the EIS, taking into account the impact of the "worst case scenario", and applying the noise control criterion that noise (LA_{10,15} min) generated by the visitor facility should not exceed existing background noise levels (LA_{90, 15} min) by more than 5dBA at the boundary of affected residential premises. The potential for transient or impulsive noise from the facility to disturb sleep has also been assessed.

The EPA considers that there is limited noise data provided in the EIS and that this makes it difficult to assess the likely noise impact during late evenings.

Despite the deficiency of monitoring data in the EIS, the EPA considers that on the basis of information provided, and assuming that the ambient noise levels for all week days will be similar to those levels on which the EIS provides data, it may be possible to operate the cafe/tea room at least until 9 pm on any day without causing offensive noise.

Whilst it is acknowledged that additional noise monitoring should be undertaken if it is proposed to operate the facility into late evenings, it is considered that there is sufficient data in the EIS to enable limited hours of operation to be set.

There is a general trend discernible in ambient noise level graphs presented in the EIS for ambient noise levels to decline after about 8.30 pm. On this basis, it is considered reasonable that initial hours of operation for the cafe/tea room be set at 7.30 am to 8.30 pm. Should operation outside these hours be sought, additional monitoring and/or noise attenuation will be required.

Additional monitoring recommended by the EPA, which should be undertaken if extended trading hours are contemplated, will need to provide data to assess:

- existing ambient noise levels at residential locations for the whole period of time over which it is proposed to operate the facility;
- the effect of local weather conditions, topography and the presence of water on noise propagation; and

- allowable noise levels, both inside and outside the cafe/tea room, for the various potentially noisy activities at the proposed facility.

The EPA considers that the most reliable way to undertake assessments of the effects of local weather and topography conditions, and of the various uses of the facility, is to carry out propagation tests for the sound-simulating noise of the proposed activities. Any additional monitoring work should be undertaken in consultation with the EPA.

The completion of additional monitoring and assessment work would enable the potential for longer trading hours to be assessed, together with any required noise attenuation. Noise attenuation could potentially include:

- * Insulation of the roof. The EPA, for example, considers that the use of a "sandwich" type lightweight structure with sound attenuation of at least 15dBA may be appropriate.
- * Airconditioning to enable the facility to operate with doors and windows closed.
- * Restriction of use of balcony areas for cafe/tea room purposes outside the hours of 7.30 am to 8.30 pm.

It should be noted that the Maritime Services Board considers that the appropriate hours of operation for the boat hire facility are daylight hours. A condition of consent to this effect should be included in any consent granted.

5.6 Access and Parking

5.6.1 Access

A number of submissions were concerned about the accessibility of the site to traffic originating from the southern side of Roseville Bridge.

The EIS relies on a park user survey to conclude that the park currently generates approximately 60 vehicle trips on an average summer weekday and 350 vehicle trips on an average summer Sunday (EIS p.38). The EIS estimates that the visitor facility will generate a maximum additional 170 vehicle trips on a weekday and a maximum additional 210 vehicle trips on a Sunday.

It is estimated in the EIS that 60-70% of traffic originates from the north, and 30-40% originates from the south.

Whilst it is considered that access for traffic originating from north of Roseville Bridge is satisfactory, there is no direct access for traffic originating from the south. As a result vehicles must use side streets. Most of the options proposed by the EIS to facilitate access involve making "U" turns in the side streets off Warringah Road to the north of Roseville Bridge.

The EIS notes that a route involving Ryrle Avenue, Duke Street and Arthur Street overcomes the necessity for "U" turns and recommends that this route be sign-posted as the preferred route for traffic originating from the south.

Whilst none of the alternative routes for traffic coming from the south are entirely acceptable, it is considered that access arrangements are satisfactory given the relatively small number of vehicles involved.

The Roads and Traffic Authority (RTA) considers that the proposed facility will have no major adverse impacts for the road network or on road safety. The RTA would be concerned if the facility resulted in parking on the approaches to Roseville Bridge, however the RTA considers such a situation unlikely. Warringah Shire Council has also indicated that there is no objection to the proposal including the access arrangements.

Accordingly, although there are definite problems in accessing the site for traffic originating from the south, it is considered that these difficulties are more likely to affect the viability of the development than to create traffic safety or amenity problems.

5.6.2 Parking

There are currently 113 car/trailer parking spaces and 31 car spaces in the vicinity of the proposed development. Additional parking is available on the western side of Roseville Bridge, some 700m distant from the proposed development.

The EIS indicates that as a result of the development the visitor facility will generate additional parking demand and identifies a likely deficiency of 30 parking spaces as a result of the development. It is not proposed, however, to provide additional parking and overspill parking is to be directed to the picnic area west of the bridge. It is also proposed that cars will be turned away at the control gate once the car park is full.

A number of submissions are concerned that an identified deficiency in parking will not be met and one submission considers that the parking deficiency has been considerably understated. Both the Public Works Department and the Maritime Services Board are concerned that the proposed facility has the potential to cause parking conflict between patrons of the cafe and users of the boat ramp. They propose that measures should be taken to ensure that this conflict does not occur.

The argument in the EIS that there will normally be an excess of parking is accepted. It is considered, however, that demand in critical periods, for example Sunday lunch times, should be accommodated. This would ensure that conflict between competing users, for example boat ramp users and cafe patrons, does not occur and to ensure that parking on Warringah Road does not result.

It is difficult to estimate the true volume of traffic which will be generated by the development and therefore the number of additional car parking spaces needed.

The major traffic generating component of the development will be the cafe/tea room, although the boat and bike hire facilities will also generate a parking demand.

Based on RTA Guidelines, a cafe/tea room of the size proposed in the EIS will generate a demand for approximately 35 additional car parking spaces. Based on Warringah Shire Council's parking code, an extra 12 spaces will be required if the cafe is considered to operate predominantly outside business hours, or an additional 50 spaces if it is considered to operate mainly during business hours.

The wide discrepancy between these figures and the unique nature of the proposal suggests that a 'best estimate' needs to be made. It is considered that the figure of 30 spaces suggested in the EIS is appropriate and that this should satisfy all the facility's demands, providing the restaurant is limited to 100 seats.

It is therefore recommended that an additional 30 car spaces be provided in association with the proposed development. These spaces can be provided by reorganising the existing parking areas and/or by providing additional spaces in currently grassed areas. Additional parking can be constructed in grass-crete or similar material in order not to increase the area of paved surfaces. It is also recommended that the requirement for coach parking be investigated if group functions are proposed.

The revised parking layout should give car/trailer spaces priority in the area near the boat ramp. Consideration should be given to restricting access in the immediate boat ramp area to vehicles directly involved in boat launching.

5.7 Exhibition Period

A number of submissions are concerned that the exhibition period for the EIS, which occurred during the Christmas/New Year holiday period, did not enable full public participation.

The exhibition period of the EIS covered the period 18 December 1992 to 29 January 1993. It is understood that exhibition may have been for a slightly shorter period in some locations. The receipt of over 100 submissions indicates that significant public involvement has been facilitated. All late submissions have also been considered.

Whilst there may be some doubt as to the proper exhibition of the EIS, it is the responsibility of the determining authority to ensure that the provisions of part 5 of the EP&A Act and any directions that may relate to the display period, have been complied with.

5.8 Sewer Connection

It is proposed in the EIS that the visitor facility will be connected to a sewer carrier main located 30m upslope from the development. This will involve the laying of a 50mm diameter galvanised steel rising main on the ground for some 50m (EIS p73) and the installation of a package sewage pumping station adjoining the visitor facility.

The EIS notes that minimal temporary disturbance of vegetation will occur during the laying of the rising main. Whilst the environmental impacts of the sewer main have not been addressed in any detail in the EIS, it is likely that no significant erosion or sedimentation will occur if standard soil conservation techniques are adopted. The painting of the pipe with a tar based paint would reduce pipe visibility.

The Water Board has granted approval for the removal of sewage and trade waste from the visitor facility. The Board's approval for the pump-out of waste from boats as proposed is also required. A boat pump-out facility would contribute to cleaner harbour waters and a highly desirable environmental enhancement.

6. CONCLUSION

It is considered that the EIS has justified a need for a visitor facility in Garigal National Park, both in terms of existing and future levels of visitation.

The site chosen for the visitor facility, whilst not optimal, is acceptable. The site's potential for conflict between boat ramp users and cafe patrons can be avoided by the parking and traffic management controls recommended in this report. Equally, the currently unacceptable visual impact of the centre can be mitigated by the design and landscaping recommendations contained in this examination.

In relation to noise, it is considered on the basis of data presented in the EIS, that the amenity of adjoining residential areas will not be affected provided hours of operation of the cafe/tea room are restricted to 7.30 a.m.-8.30 p.m. Additional noise monitoring should be undertaken if it is proposed to extend these hours.

One issue which needs especially careful consideration by the determining authorities is the question of what is/is not permissible in a national park. This examination has concluded that the question of what is and what is not permissible in a national park is not clear. Accordingly, it is considered appropriate that the issue be addressed by the National Parks and Wildlife Service in its determination of the proposal.

7. RECOMMENDATIONS

It is recommended that if the Director of the National Parks and Wildlife Service and the Minister for the Environment determine to proceed with the facility that it be modified.

The modifications suggested are:

1. Redesign of the roof of the building. Specific recommendations are:

- The shape of the roof be changed to a hip roof so as to reduce scale. This will reduce the length of the roof ridge from 40m to 27.5m and will provide a more recessive roof line.

- The eight peaked roof extensions be demolished as they are ineffective and incompatible with a revised roof form.

- The colour of the roof and all painted finishes be revised to provide a darker colour in harmony with the colour of the surrounding environment. Reflectivity be reduced through the use of a new roof material or repainting the existing roof in slate grey or similar colour.

2. An amended landscaping concept and plan. Species to be selected are to be indigenous to the area and are to complement the design of the building.

3. Re-organisation of the floor space of the building to provide an enlarged visitor interpretation centre and a reduced cafe/tea room area.

4. Provision of an additional 30 car parking spaces in association with the facility and investigation of the need for bus parking. Priority parking should be provided for boat ramp users in close proximity to the boat ramp.

It is also recommended that the cafe/tea room be limited to 100 seats as specified in the EIS and that the hours of operation be restricted to 7.30 a.m. to 8.30 p.m.

A P P E N D I X 1

SUBMISSIONS RECEIVED IN RESPONSE TO THE EIS

Government Authorities

Environment Protection Authority
Water Board

Local Government

Ku-ring-gai Municipal Council
Council of the Shire of Warringah (2 submissions)
Council of the City of Willoughby

Private

N Armstrong	Roseville Chase
P Bateson	Castle Cove
J Bennett	Castle Cove
M Bennett	Roseville
D Bray	Roseville
A Bridgekirk	Killarney Heights
P Bruce	Allambie Heights
V Carey	Killarney Heights
Castle Cove Progress Association	Castle Cove
G Champion	Killarney Heights
J & D Champman	Killarney Heights
S Cherry	Forestville
J Collocott	Castle Cove
E & R Coltman	Belrose
H Cooper	Artarmon
E Costanzo	Castle Cove
J & H Dalton	Roseville Chase
Mr & Mrs Darvin Malcolm	Castle Cove
S Davis	Davidson
L & B Donohue	Forestville
P Dwyer	Castle Cove
T Ee	Castle Hill
I Esplin	Palm Beach
R Failes	Castle Hill
K Finch	Killarney Heights
JM & JC Findlay	Killarney Heights
J Frampton	St Ives
R Gallant	Forestville
C Gibson	Killarney Heights
L Gillespie	Balgowlah
N Gould	Forestville
E Harrison	Wahroonga
L Higham	Castle Cove
E Hiley	Castle Cove
G Hiley	Castle Cove
T Hiley	Castle Cove
A Hoile	Forestville
D Hollingsworth	Forestville
D Hulme	Castle Cove
A Humpherson MP	Frenchs Forest
W Ingram	Castle Cove

L Irwig	Killara
Illegible	Davidson
Illegible	Davidson
Illegible	Lindfield
P Joes	Castle Cove
H Jones	Roseville
R Keller	Roseville Chase
V Kerr	Castle Cove
Ku-ring-gai Birdwatchers	Terrey Hills
L & J Lai	Killarney Heights
D & J Lamb	East Roseville
A Landon	Killarney Heights
A Leslie	East Roseville
S Lewis	Castle Cove
A Little	East Roseville
C & P MacDonald	Terrey Hills
L & C McDougall	Frenchs Forest
National Parks Association of NSW	Sydney South
National Trust of Australia	GPO Sydney
Nature Conservation Council	The Rocks
L Norton	Castle Cove
W Norton	Castle Cove
M Park	Castle Cove
D Patten	Narrabeen
O & J Patterson	Roseville Chase
A Perry	Roseville
K Perry	Roseville
L Pople	Castle Cove
J & M Potts	Castle Cove
F Pursell	Davidson
Recreational Four Wheel Drive Clubs Association	
H Reid	Roseville Chase
M Reidy	Artarmon
G Rich	Roseville
H Roach	Killarney Heights
F Roberts	East Roseville
Romot	Castle Cove
Roseville Bridge Marina	
J Russell	Northbridge
F Schebesta	Roseville Chase
G Scott	Roseville Chase
P Scott	Roseville Chase
J & J Speers	Castle Cove
R & E Selwyn	Castle Cove
E Sharp	Roseville Chase
S Sharp	Roseville Chase
T Sjoquist	Pymble
P Skelton	Killarney Heights
K Snedaker	Cremorne
K Snelling	Roseville Chase
J Somerville	Castlecrag
G & H Spies	Narrabeen
J Suter	Killarney Heights
Sydney Harbour and Foreshores Committee	
I Temmins	Roseville
The Boat Owners Association of New South Wales (Inc)	

The Upper Middle Harbour
Conservation Society

B Thompson

D Thompson

G Tonkin

S Tracey

G Truman

J Walker

Warringah Boat Club

B Watson

N Webber

G Wiesman

Willoughby Environment

Protection Association

L Wood

Fairlight

Neutral Bay

Killarney Heights

Forestville

Bensville

Roseville

Newport Beach

Forestville

Killarney Heights

Roseville Chase

A P P E N D I X 2

REPRESENTATIONS MADE TO THE MINISTER FOR PLANNING

Local Government

Ku-ring-gai Municipal Council
Willoughby City Council

Private

E Hiley	Castle Cove
R Keller	Roseville Chase

REPRESENTATIONS MADE TO THE DIRECTOR OF PLANNING

Local Government

Ku-ring-gai Municipal Council

Private

E Hiley	Castle Cove
G Hiley	Castle Cove
L Mitchell	Castlecrag
P Skelton	Killarney Heights
Willoughby Environment Protection Association	

A P P E N D I X 3

ADDITIONAL INFORMATION RECEIVED FROM:

Environment Protection Authority
Maritime Services Board
National Parks and Wildlife Service
Public Works Department
Roads and Traffic Authority
Water Board