

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

CONFIDENTIAL

31 July 2017

Dear Secretary

Proposed redevelopment of Ku-ring-gai College site

The proposed redevelopment of the former Ku-ring-gai College site by the Department of Education (DoE) is fundamentally misconceived and should not be allowed to proceed in its current form. I ask that planning approval be withheld at this time.

Design

As you are aware, this building is an award-winning and still relatively intact example of modern brutalism. Opportunities for preservation through adaptive reuse are to be welcomed. However, such reuse should involve minimal change to this important site – particularly its distinctive exterior.

The EIS makes clear that in its current form the Ku-ring-gai College building is unfit for use as a K–12 school. The document tells us that spiral staircases are inherently unsafe, that the parapets are too low, and shade too sparse. While I am forced to take these assertions at face value, they are reasons to seek alternative uses for the site.

The authors then throw the switch to farce, suggesting that it is necessary to “make the facades more attractive to the younger students” (EIS, p. 41). As someone who received a perfectly satisfactory primary education in buildings made from brown brick and beige weatherboard, I am at a loss to understand what possible value such additional attractiveness could add.

The proposed Building Elements Guide calls for “a playful architectural language” with “references to origami” its authors bizarrely perceive to be “educational”. The guide maintains this approach is “sympathetic to the existing building” (Appendix D5, p. 3). The artist’s impressions give the lie to this ludicrous claim. It comes as no surprise when the Heritage Impact Statement later concedes “no consultation has been undertaken with the original architect” (Appendix H, p. 4).

DoE would do well to understand what design choices made the building so significant in the first place. The Heritage Impact Statement itself acknowledges the architect’s “deliberate integration of the buildings into the existing environment” (Appendix H, p. 18).

This integration would be destroyed by:

- painting or shrouding the bricks or concrete using colours that do not appear in the surrounding bushland
- cutting the site off from the bushland by means of the proposed 1.8-metre-high perimeter fence.

It is clear that DoE has been unable to find a way in which to adapt the building for use by primary school children. As such, I urge you to reject the proposal and advise DoE to begin again, with the following requirements:

- the site be used as a senior high school or TAFE, to remove the need for higher parapets, locked-off staircases, perimeter fencing, rooftop shade structures and child-friendly colours
- any design be developed in close consultation with the original architect, David Turner
- any extensions or modifications to reflect the colours, materials and styles of the original design.

Traffic and transport

As you are aware, access to the site is via a single local road. Previous extensions to the College have been accompanied by proposals to improve road access, including via a direct link to Lady Game Drive. Since that time, much of the open space in the precinct has been converted to high-density residential development. It beggars belief that the precinct still has the same access arrangements as it did prior to the establishment of the College. That said, there appears to be limited scope to widen Eton and Grosvenor roads.

The Traffic & Transport Assessment concludes that the 2,500 additional commuters can be accommodated each morning and afternoon within the existing road network by means of minor changes to surrounding intersections. Personally, I cannot picture Eton Road accommodating a queue of 10 or more school buses, much less the line of 500 parents' cars (Appendix J, p. 3).

The Assessment's conclusions are apparently contingent on:

- existing assumptions about mode share
- the school operating with staggered start and finish times
- the success of strategies to discourage private car use.

It would be dangerous to approve the development on this basis. If, having opened, the school moves to harmonise start times, or the school community does not conform to assumptions about mode share, it will not be possible to close the facility.

Further, significant modification is proposed to the existing Eton Road bus bay. This raises a number of concerns, including:

- the heritage significance of the bus bay, built in the same style as the main College building
- the desirability of a multi-bay bus terminal operating on a sharp, 180-degree curve
- the impact of additional noise and exhaust on the planned residential development on either side of the bus bay, which did not exist when it was built.

Route A38 provides the principal road connection between the strategic centres of Macquarie Park, Chatswood and Northern Beaches Hospital. It will need to be upgraded at some point by means of a new high-level structure to replace the two-lane Fullers Bridge and eliminate the tight curves and steep grades on Delhi Road and Millwood Avenue.

In my view, the DoE proposal should only proceed once Fullers Bridge has been replaced (see Attachment A). A high-level Fullers Bridge deviation using the existing road reserve could be designed with access to the site's southern boundary. The deviation could also be designed with appropriate bus stops and kiss 'n' ride facilities.

Noise

I do not accept the assurances provided on the subject of noise. My specific concerns are as follows:

- Crimson Hill residents will experience a greater diminution of amenity due to school noise than neighbours of other schools, because these residents are far from major roads and well-insulated by surrounding bushland. Even if the 'Learning Village' were to generate the same noise level as, say, Lindfield Public School, the latter's neighbours already experience high ambient noise levels due to the nearby Pacific Highway and North Shore railway.
- The 'Learning Village' will be considerably larger than other schools in the area, making comparisons with them irrelevant.
- Because children will be playing on the rooftop terraces that abut the property boundary, Dunstan Grove residents – living across a very narrow street – will find themselves much closer to the source of noise than the neighbours of other schools.
- The lack of space and a planned staggered school day both suggest that children will be taking their breaks in shifts, meaning that from a noise-generation perspective, recess and lunchtimes will be as much as six times longer than at other schools.
- Acoustic Logic proposes to relocate the bus queue away from the Eton Road bus bay. Does this mean a new bus turning circle is to be built closer to the building entrance? Or are students to queue near the entrance and only walk to the bus bay when their bus arrives? Neither alternative seems practical.

Process

I would also like to register my extreme dissatisfaction with the quality of the community engagement undertaken as part of this project. I attended the sole community engagement activity, an information booth, in late 2016. The staff at this booth:

- presented a deliberately misleading artist's impression of the redevelopment (Appendix Y, p. 11), which did not include the vast aluminium 'origami' structures proposed to cover much of the existing structure
- failed to note community concern about the heritage values of the site – this issue is not shown in what is otherwise an exhaustive list of feedback (Appendix Y, p. 16)
- dishonestly claimed that the original architect was being consulted in the design of the redevelopment
- dishonestly claimed that a community reference group would be established for neighbours.

I also note the laziness with which the heritage assessment was completed. I draw your attention to the following lapses:

- no effort was made by the proponent or the consultant to contact the original architect, due to artificial "timing constraints" (Appendix H, p. 4)
- incorrect and incomplete text (Appendix H, pp. 54, 58)
- a reference to Santos, which suggests sections were copied and pasted from a natural gas project report (EIS, p. 49).

It is reasonable to suppose that if these errors are visible to me, a lay person, there are other mistakes and omissions that would only be obvious to an expert. I urge you to reject the document and direct DoE to engage a new consultant and resubmit in 12 months' time.

Conclusion

DoE has approached this project with characteristic incompetence and should not be allowed to proceed with their proposal in its current form. In my view, the site can only be redeveloped following:

- genuine consultation with the original architect and neighbours
- a high-quality heritage impact report
- a change in strategy from 'one size fits all' to a dedicated TAFE or senior high school
- completion of a new access road to the south.

Yours faithfully

A handwritten signature in black ink, appearing to be 'R. S. L. M.', written in a cursive style.

Attachment A: Potential new A38 alignment

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