

Major Projects Assessment

Department of Planning and Infrastructure

GPO Box 39

Sydney NSW 2001

Email: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

Fax: (02) 9228 6455



Re: MP 10\_0150 & MP 10\_0149 – Graythwaite Concept Plan

**I OBJECT TO THIS APPLICATION.**

**Name:**

**Address**

**2060**

***I DO NOT give permission for my name or address to be made available to the proponent, other interested public authorities, nor for it to appear on the Department's website.***

***I have made NO political donations in the last 2 years***

## Re- Revised EA Shore/Graythwaite

### WHAT IS A REVISED EA?

It appears to me that the regular process in dealing with this application has been changed.

I was of the understanding that when the previous application was submitted I was to submit objections and comments, which I did.

I then understood that the Applicant was to come back with a Preferred Project Report (PPR) and this was to be assessed by the Planning Assessment Committee (PAC).

It seems that the School has now presented a "Revised EA".

I seek an explanation as to why the usual process has not been adhered to, why the application appears to be proceeding in such an unusual manner and I challenge the legality of this Revised EA.

**If a REVISED EA is permitted** then I wish to point out that, this "Revised EA" now includes,

- land outside the original EA (**nearly double the original land area**)
- Major new developments that were not included in the original EA, including changing local road conditions
- It also includes land that the applicant says it doesn't even own (refer to pick-up/drop off options.
- Coach turning area on the lower terrace, **which was never exhibited at the recent Open Day**, but is included buried deep in the volumes of associated information.

This development now goes beyond the original application, in land area and significant issues, so wouldn't that usually result in the **need for a completely new application rather than just a revised version?**

### In this "Revised EA" the School –

**HAS NOT solved the traffic issues** but rather, it presents several "options"(without queuing analysis) that have not been endorsed by the local community or the local council because the local community has already voiced their informed local opinions that these options will not work.

This ill prepared section of the application is more an internal discussion paper not an application. The section is difficult to understand, and almost impossible to respond to.

**THE SCHOOL HAS NOT RECTIFIED THE ISSUES WITH THE WEST BUILDING** regarding,

- height, size and bulk
- visual and acoustic impacts
- 

**THE SCHOOL HAS NOT CARRIED OUT TO THE DEPARTMENT'S INSTRUCTIONS,**

- site poles for revised EA have not been erected
- photo montages are incorrect

**THE DIRECTOR GENERAL'S REQUIREMENT FOR COMMUNITY CONSULTATION HAS NOT BEEN FULLFILLED,**

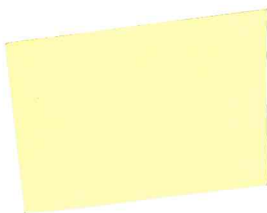
- the wider community was given one opportunity and invited to attend an Open Day of 2 hours on 30 July where no formal minutes were recorded.

In the following pages I assess this Revised EA in regard to these matters and demonstrate why this REVISED EA and the previous EA should be rejected.

I have also attached my original submission, dated 7 March 2011 as the information contained is still relevant and issues raised have not been addressed.

I am happy to answer any questions or queries and supply additional information if necessary.

Sincerely,



# **SHORE/GRAYTHWAITE REVISED APPLICATION.**

## **COMMENTS ON;**

### **PICK UP ZONE OPTIONS REPORT DATED SEPT 2011.**

This Revised application raises design concepts for an additional pick up/ drop off facility on the Shore Campus.

Here are my comments that have not been addressed in the applicant's submission.

#### **OPTION 1.**

- right hand turn from Union St too dangerous
- entry is on the crest of a hill
- summer afternoon sun blocks vision
- not enough queuing space
- proponent does not own the land "requires purchasing and rezoning of land "

#### **OPTION 2.**

- right hand turn too dangerous
- entry on crest of hill
- summer afternoon sun an issue
- still not enough queuing space
- driveway too narrow
- site lines for street pedestrians at this driveway are already too limited
- this driveway is also used for delivery vehicles and entry and exit to carpark

#### **OPTION 3.**

- as above



- **WHY IS RIGHTHAND TURN FROM UNION ST now considered an opportunity rather than a constraint as with previous 2 options ?**
- No consideration for pedestrians using Union St footpath , they would be sandwiched between 2 lanes of traffic
- Visual impact too great
- Think about this being used at night with cars with headlights on . It would be distracting for motorists on the road.

#### **OPTION 4.**

- heritage constraints are a key factor for this site , this goes against all heritage requirements
- right hand turn in too dangerous
- not enough queuing
- “likely to provide min traffic relief “ “ increases queuing time in Union St”
- double use of Union St

#### **OPTION 5.**

- Dismissed by the applicant

#### **OPTIONS 1A, 2A and 3A**

- the same problems above exist, plus
- increased traffic at Blues Point Rd intersection
- right hand turn out of Union st drive is dangerous
- cars trying to enter William St would be queued around into Union. This queue would join up with the queue trying to exit Union. Thus the school traffic would create a stagnant circle of cars not able to go anywhere (until someone tries to overtake!)
- Lower entry into William St is too dangerous for that much concentrated traffic.

**Even without detailed analysis these options put forward are not viable and are unsafe for local residents and school children.**

If you look at the figures supplied by the school and if Union St takes 50% of the afternoon pick up load this equals 132 cars, with 33 cars arriving in

the first 15 minutes. This would mean that a minimum of 16 cars would be queued on Union St at the start of pick up.

It is most likely that Union St would take more than 50% of the load as the Edward St facility is already at capacity without any increase in school numbers. Thus in reality many more than 16 cars would be queued in Union St.

Union St is one lane either way, with cars queued on both sides , Union St would be at a stand still. This is illustrated in the following diagram.

**I am appalled that in the brief notes on opportunities and constraints the proponent focusses on items of importance like, “relocation of sewer manhole “ without one mention or consideration to the pedestrian traffic that uses Union and William Streets or the requirements of local residents, particularly local school students.**

For example:

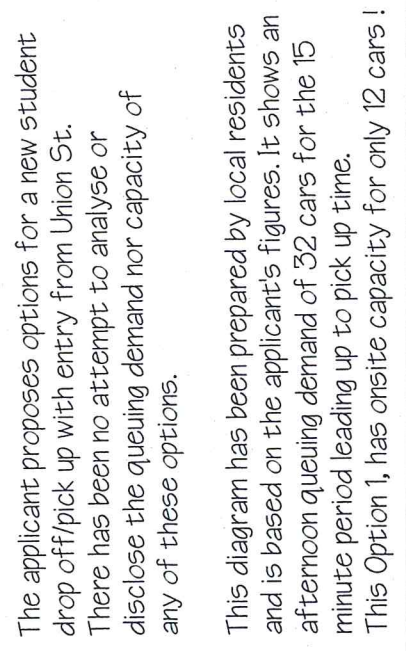
If Option 1 pick up was implemented with the onsite bus facility option figure 3, our daughter and many other school children who live in the area would have to cross,

- **5 double Shore driveways, measuring approx. 30 metres within a stretch of Union St of approx. 50 metres**
- 
- navigate between, exiting queued cars of Shore parents
- Shore teachers coming and going,
- mini buses and delivery vehicles,
- traffic entering and exiting Graythwaite and
- 8-12 full size coaches arriving and departing to take Shore students to Northbridge sports training
- 

**all this while walking home from public bus, train and ferry services. I think this situation results in serious safety concerns !**

There are many issues that must be taken into consideration and be of HIGH PRIORITY as they are issues of safety, when considering any traffic changes in the Union and William Street area. Here are a few examples that have been totally ignored to date.





**NEW ENTRY DRIVEWAY OFF UNION STREET**





- **there is no pedestrian crossing in Union St (only lights at Union and Blues Pt Rd)**
- 
- **children attending schools in the local area need to cross Union St in both directions morning and afternoon whether they are walking to school or catching the local school bus.**
- 
- **the local school bus stops morning on the south side of Union St and afternoon on the north side of Union St just west of the Graythwaite and Shore driveways.**
- 
- **William St is the “walking bus” route for the North Sydney Dem School students from Blues Point Rd area**
- 
- **children attending schools outside the local area walk along Union St to get to public bus, train and ferry services both morning and afternoon**
- 
- **The 265 public bus goes along Union St, the bus requires both lanes to make the left turn from Union St into Blues Point Rd**
- 
- **The extra traffic movements from the already approved townhouse development in Union St must be taken into account**
- 
- **The afternoon pick up also starts again later in the afternoon to pick up from after school activities and after school care which would have a higher rate of pick up. I have witnessed car lines at 4pm in Edward St due to this.**

The application states “The design concepts prepared presents the full range of options investigated for a new afternoon pick up area for Shore school students “

With such an immense parcel of land there are many more options, as well as improvements to existing Edward St facility and many “green” policies that could be investigated and implemented to actually REDUCE SCHOOL



TRAFFIC . Some ideas I have already raised with the School consultants and they have been ignored or dismissed.

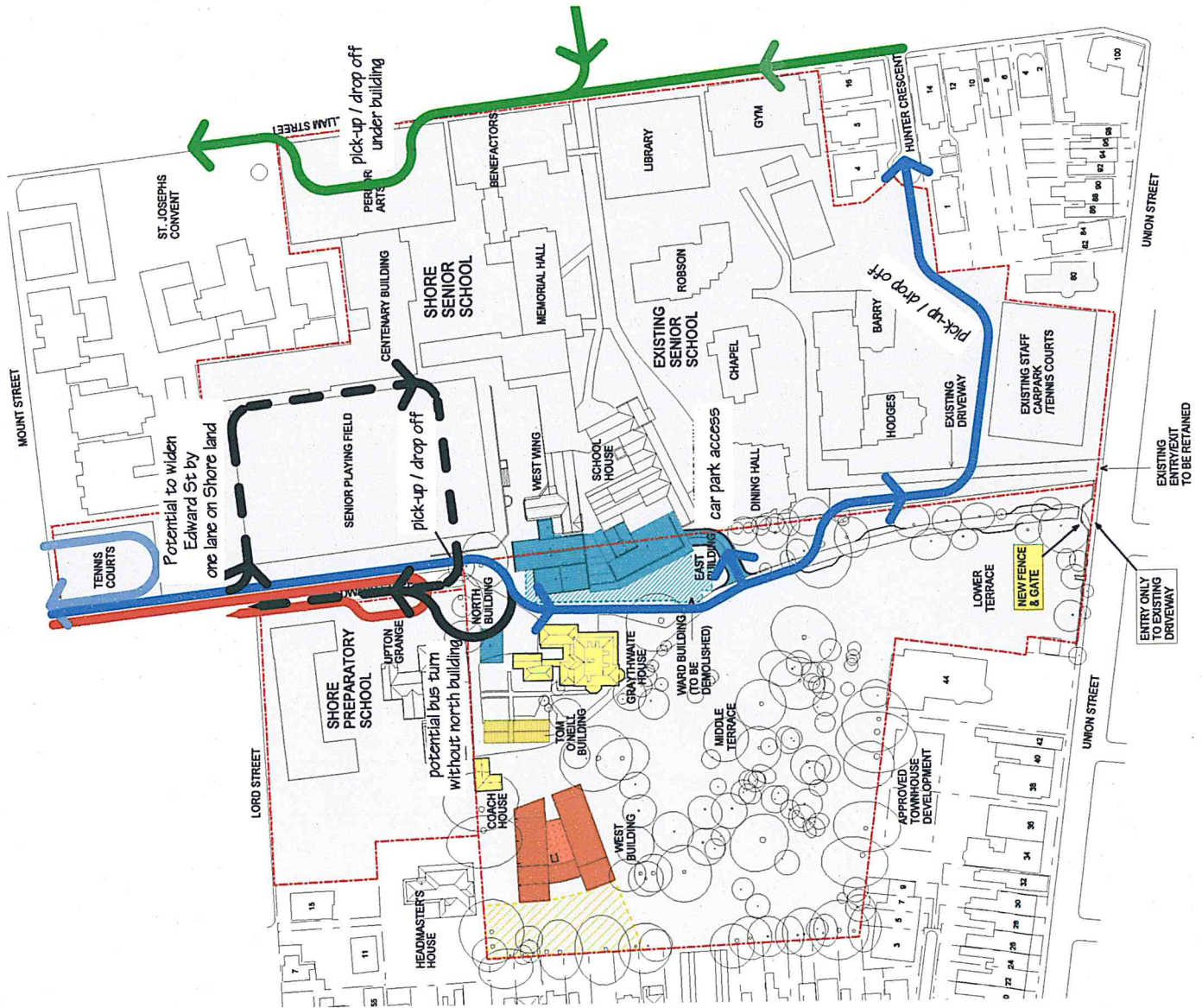
**If the preferred way to approach the traffic issues is to provide another pick up/drop off facility, the best option, that I'm not sure why is not in this report, I can take no claim to fame for suggesting but give all credit to the school. See attached diagram.**

**Last Monday morning between about 8am and 9am, 28<sup>th</sup> November 2011, I witnessed nearly 100 Shore cars parking on the school oval.**

**Using existing driveway entrances from Edward St, all parking onsite and off the local roads, plenty of space for manouvering and turning around , it was all happening in a most orderly fashion with no road rage and no disruption to local traffic or residents. Full marks to the School.**

**I think this was the Carol Service morning, but obviously the school has utilised this area for parking on previous occasions as it was well organised and worked extremely well.**

**To add more credit to this stroke of brilliance and suggested pick up option, the facilities are already in place. No trees will have to be cut down, no parking spots taken off the street, no safety issues for pedestrians and NO RELOCATION OF A SEWER MANHOLE !**



### RED line

Existing Prep pickup

### BLUE line

Potential one way route from Edward St to serve new staff car park and continue to new pick-up and exit into Hunter Cres. Potential to widen Edward St on east side to provide two approach lanes (red + blue)

### GREEN line

Potential under cover pick-up in Centenary car park using Blue St and William Sts as parkers. Any external queuing is on local roads, not collector roads.

### BLACK dotted line

Potential additional pick up using existing playing field perimeters, as currently used by Shore on special occasions

POTENTIAL TRAFFIC  
PLANNING OPTIONS USING  
EXISTING SHORE LAND



# SHORE/GRAYTHWAITE REVISED APPLICATION .

## COMMENTS ON;

### A SUMMARY OF THE BUILDING DESIGN CONSIDERATIONS.

Dated Sept 2011

#### WEST BUILDING

##### 1.pg 4

Application states that the design process involved consideration of **“ the height requirements of the local planning instruments.”**

The height limit on the Graythwaite site is 8.5m so why is the west building up to 12 metres in height? This is close enough to an additional 50% over the height limit.

The original plans had a height of approx. 14 metres now the plans have come down to 12 metres when the height limit is still 8.5 metres . The school cannot suggest that this is a concession they are making to the residents when they should be putting forward plans with a building height of less than 8.5 metres.

This course of action indicates complete disregard to the height requirements for the site and complete disregard to the suggestions made by local residents through “ the community consultation process “.

##### 2. pg 4

**“Having established the desired floor area, the size of the education spaces and circulation area, and the required functionality of the building, several concept layouts were developed .... “**

The School’s architect has consistently stated that the school does not know what they are going to use the building for and that he did not have a brief as to its use. How can “the desired floor area” etc be determined when the use of the building is unknown .If the School does not know what it is to use the building for , how can there be a “ required functionality “.

If the school has more information then it would be useful to share that with the community so we may see why such a large structure is necessary with such a large circulation space – why not 2 separate buildings? or even 4 smaller ones ????

If the School has more information it should be properly disclosed. Surely consultation – and the benefits afforded by Part 3A – require such openness.

With the design of the building as such – it can accommodate 350 students plus 40 teachers, so nearly 400 people in I assume the classroom spaces . What about the circulation space? Can an additional 400 people be accommodated in that space bringing the number to 800?

What is the school planning to use that space for? Wet weather play area/locker rooms / area to hold assemblies/ additional teaching areas?

The design of this large structure could easily hold a lot more than the proposed 400 people and what would stop the school from reconfiguring the internal structure in the future?

This structure needs to be a lot smaller so the number of people able to congregate in the one area is limited. If the school requires additional classrooms then why not just build classrooms? The school is obviously just trying to get the biggest footprint/building approved and work out details later, this is unfair to local residents.

If the school is unsure of its requirements in the future and say this stage 3 would be 10-15 years away why include this in the application at all? Let's deal with the west building when the school knows its requirements and can provide a detailed design that can be sensibly presented to residents rather than simply drawing the biggest square in the sand.

If we could all agree to that rational view then I would not need to go any further but I sadly think that will not be the case, so .....

### 3. pg 6

The new proposed plans have “ **an increased setback from the west boundary.**”

This setback is minimal, approx. 2-3 metres.

This is still too close to the western boundary for such a large building.

“the new development is predominantly 2 storeys in height, reflects the sloping topography and does not present a dominant visual impression of a multi storey building when viewed from significant vantage points “

When will the school realise and accept that significant vantage points are not just from East to West but could possibly also be from West to East or South to North?

The new building design does not comply with height regulations and still presents as a dominant visual impression of a multi storey building, which is what it is when viewed from the rear of Bank St properties and from our point of view, that is a very significant vantage point !

If the building does not look like a multi storey building then what does it look like?



4. **“ a building with a reduced gross floor area “.**

This reduction in floor area is minimal, approx. 10%.

How is this relevant? The school has reduced the floor area of a non compliant building ie one that exceeds height limits, to propose another non compliant building. Surely we must start with a building that complies then make changes to make these concessions have any meaning at all.

5. **“more sensitive finishes and a greater articulation on the western façade to diminish the visual impact “.**

I acknowledge that the central circulation area has been set back from the 2 building wings which may result in a greater articulation but I have not seen any details re finishes . The report states that details will be provided further down the track . Please supply details of the more sensitive finishes.

6. **“ incorporation of additional acoustic finishes and details to further reduce any potential noise impacts to acceptable levels. “**

Of course, implicit in this statement is an admission that without the “ further reduction ,“ noise impacts would be unacceptable. Why was a building with unacceptable noise limits proposed by the School in the first place? Obviously with little if any regard to its neighbours .

While we do not consider that even the proposed finishes are likely to make noise levels “ acceptable “, we would like to know what these might be.

The school’s architect has said verbally that the circulation area will now be enclosed but I have not seen this in the application and do not know how it is being enclosed and with what ? I think we need to know this information now rather than down the track.

7. **“retention of design features to prevent any overlooking to Bank St properties .“**

Please supply details of these design features . I have noted some trellis type structures planned for the southern end of the southern building but I am unclear re the rest of the building especially the west façade.

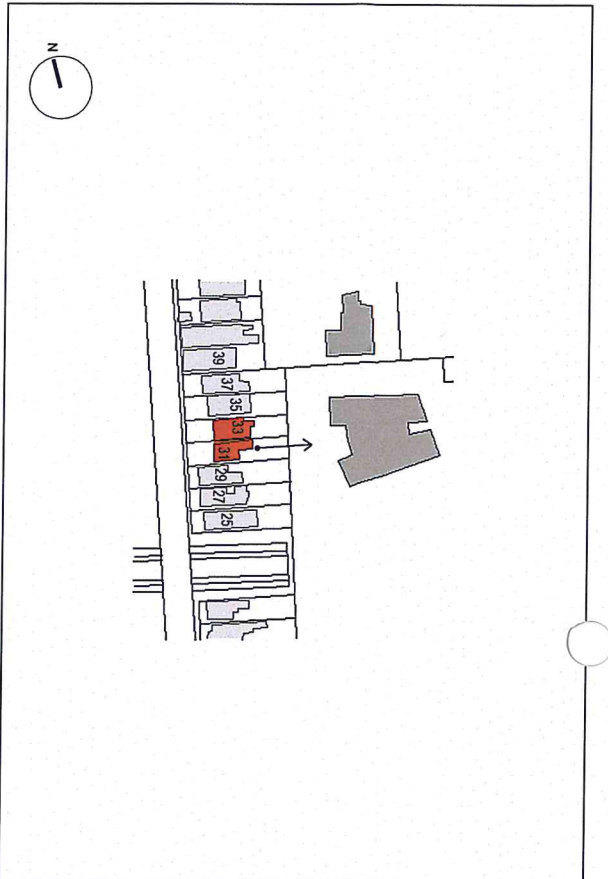
8. **Photo montages and site poles.**

These were shown and erected for the meeting held 22 June when the second design was presented.

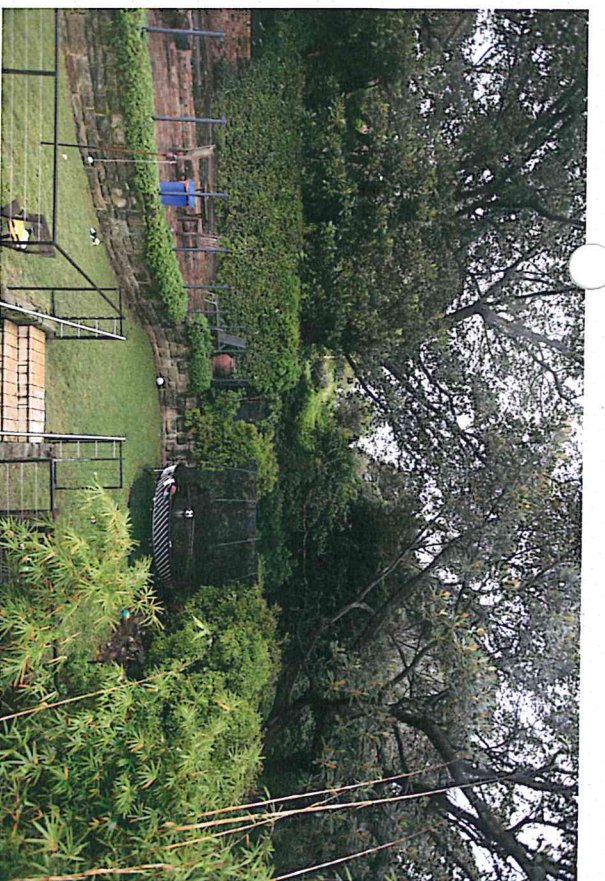
After that meeting the design was changed so I think that the photo montages reflect design no. 2 rather than design no.3 and the site poles definitely must have related to design 2 not the design that is in this application (let’s call it design 3).

Photo Montages/Drawing No.A.502A/ A.502B/ A.503





Camera Position 5



A. View of Existing Conditions



B. View with Proposed West Building and Weed Vegetation Removed



C. View with Proposed West Building and Screen Planting

Note  
green  
box

Client  
Sydney Church of England  
Grammar School (Shore)  
Main Street  
North Sydney  
NSW 2060  
T +61 2 9623 2277  
F +61 2 9623 2266

ARCHITECTS  
Main Architects  
1 +12 266 044  
F +61 2 966 424  
LANDSCAPE ARCHITECTS  
1 +61 2 967 855  
F +61 2 967 855

ARCHITECTS  
1 +61 2 929 039  
F +61 2 929 037

PROJECT MANAGER  
1 +61 2 929 039  
F +61 2 929 039

Rev.	Date	Description	Checked	Auth.
0	10/03/2011	CONSENT CONSULTATION	JS	FN
1	10/03/2011	REVISED	JS	FN

Proj. No.	Proj. Arch.	Drawn
0910	20	1/11
0910	20	1/11

Project  
GRAYTHWAITE - CONCEPT APPLICATION  
SYDNEY CHURCH OF ENGLAND  
GRAMMAR SCHOOL (SHORE)  
Drawing Title  
VIEW FROM REAR 31 BANK ST  
(SHEET 1 OF 2)  
Drawing No.  
A-502-A  
Revision  
G

PROJ. NO. 001  
DATE: 10/03/2011  
DRAWN BY: 1/11  
CHECKED BY: 1/11  
TANNER ARCHITECTS  
1 +12 266 044  
F +61 2 966 424  
LANDSCAPE ARCHITECTS  
1 +61 2 967 855  
F +61 2 967 855

PROJECT MANAGER  
1 +61 2 929 039  
F +61 2 929 039

PROJECT MANAGER  
1 +61 2 929 039  
F +61 2 929 039

PROJECT MANAGER  
1 +61 2 929 039  
F +61 2 929 039





### A. View of Existing Conditions



C. View with Proposed West Building and Screen Planting

[illegible]Revision  
GMAYOH  
ARCHITECTS

PO Box 6652  
Darlington  
NSW 1530  
Australia

52 Abdon Street  
Surry Hills  
NSW 2010  
Australia

T +61 2 9261 4399  
F +61 2 9261 4337  
info@starrarchitects.com.au  
www.starrarchitects.com.au

62 Stratford Avenue, Northridge  
NSW 2063 - Australia  
T: 62 9928 0488 : F: 62 9928 8428

↑ Not  
guy  
box







In A.502A Photo C there is a green box structure on the right hand side of the proposed building and it is not there in photo B. The same applies in A.502-B and A.503. I question the professionalism and accuracy of these photo montages and ask what is the appearing and disappearing green box?

In letter dated 20 Sept from Haycraft to Mayoh “ we liased directly with Taylor Brammer to identify existing vegetation to be removed and to obtain information regarding the height and location of the proposed planting .”

The proposed planting that has been added to the photo montages , are these plants represented at their potential maximum size or size when planted?

Please note that even if the first elevation of the building on the western façade is 8.5 metres , the further elevations can be clearly seen even with screen planting. The height limit of 8.5 metres must be adhered to and these plans need to be refused.

9. pg 7

**18 July – Meeting** with Bank St residents at DPI office for residents to present other ideas in order to promote more discussion and meaningful consultation. It was stated at the meeting , that it was not the residents intent to design the building but to show that there were more possibilities that could fit in with the requirements of the Heritage Council.

It should also be noted that residents were still against any building being planned for that area.

Discussion re plans presented by local residents states that these were presented “ **without a brief from the School on requirements.** “

At that same meeting Peter Mayoh was asked about the School requirements for the building and he replied that he did not have a brief from the school as they didn't know what it would be used for.

If there is a brief on the School's idea on what the building will be used for, can this be made available.

As discussed the residents plans reduced the floor area mainly by a reduction in the circulation and ancillary areas. The large circulation area proposed in this building has always been a concern due to the noise that could come from that space when 400 people or more were occupying it.

It really is necessary to reduce this space or delete it altogether , so that it will not be used to assemble large numbers in it.

**“ it was not apparent why a 30m setback was considered necessary .”**

I find this a very naive statement.

The residents require as great a setback as is possible , a buffer between a multi storey building accommodating 400 people from residential homes accommodating 2-6 people.

This 30 m setback was still achievable using the constraints of the CMP . This increased set back moved the proposed building closer to the Graythwaite House but still within the constraints of the CMP. As a resident I do not consider any setback of the proposed building from the Graythwaite House over and above the CMP setback requirements as necessary .

At this 18 July meeting the School announced that they were intending to host an open day on 30 July, some 12 days later.

Despite all the good intentions from the residents by putting forward another possibility in order to achieve some meaningful “ consultation “, dialogue and a better outcome for all , the School chose to ignore any of those suggestions .

I suggest that this was probably their intention all along.

Before coming into the meeting they had already scheduled the 30 July open day , I doubt they had ever considered going back to the drawing board and producing an alternate plan and having it ready for display within a 12 day period.

With that attitude you could hardly label the 18 July meeting as community consultation .

#### **Pg 7-8**

States the changes they made “ **subsequent to the residents meeting** “, I presume they are referring to the 18 July meeting.

I suggest that most of these changes occurred for and after the June 22 meeting not the 18 July meeting, making a nonsense of real consultation.

#### **“ location poles erected by survey for meeting. “**

These poles were erected for the meeting held 22 June.

These poles related to Design No. 2 which was presented at the 22 June meeting and before the residents tabled their alternate design up for discussion .

These poles were taken down a few days after 22 June.

#### **“ poles to be re-erected for revised EA. “**

**This has not been done. I request that the exhibition period re starts after poles are erected for this Revised EA.**

Poles for the latest design No. 3 have **never** been put up.



**“scientifically generated montages“**

These were first shown at the 22 June meeting based on the location poles put up for that meeting. Since no poles have been put up since, are the montages of the current design tabled in this revised application or a previous design ?

**Pg 9**

**July 30 Open Day.**

In the plans displayed on this day the western façade of the building was increased thus increasing the visual impact.

At this open day the residents suggested reversing the layout so that the splay between the buildings faced east rather than west to reduce the impact on residents.

The School's architects have stated that they do not feel that a better outcome would be achieved. I think this should be investigated further.

I also raise the need for the circulation space at all. Why not treat the 2 buildings as 2 buildings thus reducing scale and bulk and potential noise effects.

Once again I ask what is this building going to be used for ? If the school doesn't know then how can they design a building now ? Shouldn't this stage 3 be deleted from this application and dealt with at a later date when more details are available ?

With the West building submission, the school is presenting plans for not just one building but in effect for 3 new large buildings joined together. Two buildings of classrooms for 350 students plus 35 teachers and a very large “ circulation area “ to be used for what?

It appears that the only change in the plans for the west building as a result from the community consultation on 30 July is that the building will now be enclosed on the western side to attempt to control noise emissions to acceptable levels – but we are not told how it will be enclosed .

**Pg 10**

**“ As a result, the building design that is prepared in the Revised EA is based on that design presented at the Open Day of 30 July 2011 which is considered to be the best outcome and one which properly responds to the educational needs of the School , planning requirements of the authorities and the amenity for the community. “**

- what are the needs of the School ?
- the building does not comply with height limits and is still closer to the west boundary than it needs to be, taking into account the Heritage issues.
- How does this building increase the amenity for the local residential community?

More fundamentally, how can there ever have been proper community consultation when the School does not even know what the proposed massive building will be used for?

In the above quote, the school says that **the current building design is based on the design presented at the Open Day of 30 July.**

**In other words, the School made no changes to the building design as a result of the open day on 30 July . July 30 was an Open Day for the School it was not a day of “ community consultation “ as required by the Director General.**



## **SHORE/GRAYTHWAITE REVISED APPLICATION.**

### **COMMENTS ON ;**

## **GRAYTHWAITE REVISED EA CONSULTATION REPORT.**

Dated September 2011.

### **In relation to community consultation.**

Pg 1 . Executive Summary.

**“the wider community will have been provided with substantial opportunity to review and express their views in relation to this development.”**

At the time this report was written , Sept 2011 , the wider community had been given **one** opportunity to express their views in relation to this development.

That being the Open Day put on by the School on 30 July 2011.

**“the School has demonstrated that it has considered all of the community and legislative input and responded appropriately.”**

In regard to the above comment and the West building I bring your attention to the School's comments in this revised application that the building design presented in the revised EA is based on the design presented at the Open Day with the only change being to enclose the building on the west façade to reduce potential noise impacts to acceptable levels.

The School may of listened to the concerns of the community but it has not taken any action in regard to those concerns. They have considered them and then dismissed them.

### **Pg 5 Table 1 Consultation Prior to EA exhibition.**

There was no community consultation prior to the EA exhibition.

### **Pg 6 Table 2 Consultation during Original EA Exhibition.**

Community advised of the existence of the EA and EA on exhibition .  
I do not consider this consultation.

### **Pg 7 Table 3 Consultation following Original EA lodgement**

**9 April 2011 Public meeting called by NSC.** At this meeting no representative from the School advised they were in attendance though the question was asked at the opening of the meeting. This meeting was organised by NSC , an invitation was offered to Shore to address the meeting which they declined – I hardly call this community consultation on

Shore's part. Shore's part in the event was to station security guards at the Graythwaite entrance on Union St to intimidate community members .

**18 July 2011 DPI/Bank St Residents/ School meeting at DPI** for Bank St residents to present other ideas for the west building in order to achieve some meaningful consultation , dialogue and a better outcome for all .

The School chose to dismiss all of the resident's suggestions.

**30 July 2011 Open Day hosted by Shore for the general community.**

Invitations were also sent to the Shore community , the school has forgotten to put that in their notes.

This Open Day was an information morning to allow Shore to present their plans.

There was no chance for formal minutes to be taken and there appears to be very little outcome from this morning.

### **ANALYSIS.**

Pg 10 – 11

The analysis states that Shore's purchase of Graythwaite should have provided an indication to the community of its intentions.

I must remind Shore that when Shore purchased Graythwaite it said there would be **no development on the site.**

Perhaps we should have interpreted their actions instead of their words.

There were several chances for different select groups to engage with Shore but unfortunately the suggestions that the school was willing to adopt were minimal.

There was only one opportunity to engage the wider community , the Open 2 hours on 30 July when no formal minutes were recorded.

**I do not think that DPI's guidelines for Community Consultation have been fulfilled.**