

The Heritage Council
Locked Bag 5020
PARRAMATTA, NSW 212

11th October, 2011

Dear Councillors

RE: NORTH HEAD QUARANTINE STATION PROPOSED WORKS

The Friends of Quarantine Station (FroQS) are pleased that the proposed works at the Quarantine Station, Manly, have been placed before the Heritage Council for consideration. DECCW staff originally told us that they had the option of approving the application internally, which caused us great concern, as DECCW is, in fact, the joint proponent of the development.

The Quarantine Station is listed on the State and National Heritage Registers for very good reasons. This site is an icon of Australian history in its many varied aspects and therefore should be valued and protected to the fullest for current and future generations to learn about Australian history. It has more stories to tell than any other quarantine site in the country, and along with its neighbours on North Head makes up a precinct of both natural and cultural heritage, close to the city, and therefore very accessible to many people.

FroQS has perused the documentation available at Manly Library and provides the following comments on the proposal:

The proposal is still missing some relevant information as follows:

- Original drawings of P21 and P23 for comparison purposes and details of how the footprints, bulk and height of the original buildings and the new buildings compare, and
- Plans for “offsets”, where removal of the endangered Eastern Suburbs Banksia is proposed, under the provisions relating to an Endangered Ecological Community.

Use of Site and Cultural Integrity

The cultural integrity of the Third Class and Asiatic Precinct and how it is used is a fundamental issue that goes back to the original proposal, spelt out in the Commission of Inquiry report, the CMP, the DACMP and the Conditions of Planning Approval for the development. Many references in each of the key conservation documents attest to the valuable interpretation to be gained from this unique precinct. The use of the precinct for **educational** purposes was an essential part of the approval. The Commission of Enquiry determined that the precinct should offer equity of access, education and interpretation opportunities for our younger generation, thereby balancing the segregation of part of the site for a hotel.

Community acceptance of the privatisation of the site and hotel development is in part based on the concept that many students would gain a wonderful educational experience from staying in and learning about the site. This part of the 'contract' has been fulfilled and is not likely to do so if this plan is approved. The proposal to build additional luxury rooms with ensuites, instead of the dormitories and study centre will not secure the desired Environmental and Cultural Study Centre for student use which is at the heart of how the Third Class and Asiatic Precinct should to be used.

The Conditions of Planning Approval clearly state that building on the site of P21 and P23 is dependent on full use of the current buildings for education purposes including dormitory student accommodation. Conditions 22 and 25 are very clear about the use of this precinct and the intention for young people to access and stay in the site.

The justification for the design of P21 and P23 replacement buildings is clearly flawed.

Mawland have not included the report from ESC Eschelon Corporate Solutions in the material submitted to the Heritage Council. However this was presented at the Community Consultations earlier this year as justification for the plans. We include a copy of this report for your information. This report states that students will not use dormitory accommodation therefore the condition to provide dormitories at QS should be waived. However Mawland admitted that students who visit the site from outside Sydney do stay in dormitory style accommodation, (often at the Collaroy Salvation Army site) although not on site at North Head. Therefore the justification for small rooms with ensuites is false.

This information shows how flawed the Echelon Corporate Services report is. In fact the recommendations of this report make zero mention of students of any age, highlighting the solely economic drivers for the proposal. Furthermore, the proposed 'flexibility' of room design and furniture appears to fail even in meeting the educational OH&S requirements to "reduce risk associated with improper conduct" which are also used as justification for moving away from dormitory accommodation.

The submission by Mawland fails to address the key issue of the designated use of the precinct, justification on usage levels of current buildings as per Condition 22. The clear impression from the submission is that the new buildings will be used for high-end hotel accommodation. The statement by Mawland that they need more hotel beds for viability of the hotel is not appropriate justification nor is Mawland's rationalisation to provide flexible room options to cover a range of possible accommodation uses. The reports quoted in Table 1 in the proposal are all economic viability reports.

FroQS has always been concerned about the economic viability of the Mawland tender and has often sought financial and economic information from the State government to enable us to learn more. This information has always been shrouded in "commercial in confidence" and therefore unavailable. Many of the promised features such as the sound and light show have long been cancelled.

When FroQS has raised the question of economic viability we have been reminded by the Department of Planning, DECCW and the Heritage Council that economic considerations are not planning considerations.

If the Third Class/Asiatic precinct is used for hotel accommodation with ensuites it will no longer be the Third Class/Asiatic precinct. Interpretation will become more difficult, tours will be unwelcome by resting guests, the education precinct will be lost and the Q Study Centre (focused on Environmental and cultural study) will be a mockery. No evidence of increased educational demand warranting further development is

provided. We were unable to find any reference to student education on the website, which is very telling in regard to the operator's level of interest and commitment to education.

There is a real danger of the whole site becoming sanitized and thereby weakened from a cultural heritage perspective. The way this precinct was used, and the DACMP contains photos showing this, is an essential part of the site, the class divisions, the way food was prepared, people slept and entertained themselves, etc. that tours cannot possibly demonstrate. FroQS is therefore looking for in situ interpretation as part of the educational activities of QS.

Design Issues

The Conditions of Consent approves the buildings to be rebuilt - not for the developer to build something different. The lack of detailed information on the relative sizes of the new buildings in comparison with the original buildings is significant. Without this it is impossible to assess the visual impact of the scale, height and bulk of the proposals. Our view of the plans provided, noting the lack of dimensions in regard to the previous footprint, is that these buildings will be larger in scale and footprint. This is contrary to all relevant documentation and approvals, and cannot be approved.

The architect states that the increase in size is "minimal". This does not give the Council an accurate idea of the increase in size or visual impact.. Peter McLaren, former Commonwealth Heritage Architect, has carried out an analysis of the size difference and his report is attached to this letter.

The interior design change into rooms with ensuites is inappropriate in relation to the Conditions of Consent and the DACMP. If the buildings were to be built (after full compliance with the Conditions of Consent) they should be as student dormitories. The rooms also lack air flow which may lead to later demands for air conditioning.

Reconstruction presents an opportunity to reconstruct in a way that will reinterpret the Third class and Asiatic accommodation. This is of particular importance in indicating racial and class attitudes current from the 1880s when these buildings were originally created.

Submission from Alistair Henchman and Table 1

It is worth responding to some of the statements in the letter from Mr. Henchman and the attached table:

The documents cited on page 2 and in the Table as support for the application are economic documents, highlighting the economic drivers for this proposal; ie to increase the number of hotel beds available. The Conditions of Consent are clear that the driver for reconstruction of P21 and P23 is to be the need for more student accommodation when the other buildings in the 3rd Class/Asiatic precinct are fully utilized.

Mr Henchman does raise concerns about the extra size of the two proposed new buildings but does not offer any analysis of how much bigger the buildings would be, what the visual impact would be and how this relates to the Conditions of Consent in regard to building on original footprints.

Table 1

Mr Henchman submitted a Table 1 Assessment against Conditions of Approval to the Council with his letter supporting the application. This Table raises a few further issues:

- a) Mawland are submitting occupancy certificates for seven buildings which make up the Study Centre – these are not itemized making it difficult to know if they are actually in use for students. We are not sure if ‘operational’ means having an occupation certificate. Surely one can have the latter without the former. Therefore the condition is not met by having an occupation certificate, but by operating a student study centre at full capacity as Condition 22(b) requires before extra buildings are considered. As no students stay on site now, how can extra accommodation be justified?
- b) If P14-16 are now to be used for moveable heritage what space does that leave for the study centre? Where will classes be taken, discussions held? There is new information in this section with a proposal by Mawland to use buildings outside this precinct for student accommodation. A quick look at the map shows that the H8, 9,10 and 11 are in the Isolation Precinct, some way from the 3rd class/Asiatic precinct, which could present many hazards and O H & S challenges. We wonder how teachers would feel about supervising students in buildings so far apart. The other buildings S4 and S10 are also small houses at a distance. This proposal needs serious consideration as it is a departure from previous plans.
- c) P27 is part of the 3rd class/Asiatic precinct and originally intended to be used as part of the study centre (see Condition 25). This Condition clearly states that ‘function’ use is to be secondary to education use. This is a wonderful evocative building, complete with kitchens, which Mawland have now deleted from the study centre. We understand that it is currently used for functions, contrary to the Conditions of Consent.

Natural Environment

FroQS read with interest the amount of Eastern Suburbs Banksia scrub to be removed, which is considerable, and which would have grown over a long period of time. However we could find only brief mention of replacement planting addressed within a single paragraph in the Threatened Species Assessment. A passing reference to “revegetation , or assisted regeneration of, ESBS at suitable [as yet unspecified] sites”, does not, in our view meet the requirements as directed by the planning and environmental controls.

Summary

In our view the application for building on the site of P21 and 23 has failed to comply with the CMP, DACMPs and Conditions of Consent and should be refused. The application will significantly impact on both State and National Heritage Listings and would be contrary to the Burra Charter.

We formally request the opportunity to address the Council, or the Committee of Council, which considers this application.

With kind regards

Sue Sacker, President

cc. Nick Skelton, Chair QSCC
Minister for Heritage, the Hon Robyn Parker