

10 October 2022

SSD-14394209 --- AMENDMENT
BUNGENDORE HIGH SCHOOL (BHS)
FORMAL OBJECTION

I objected to SSD14394209 as it appeared in the original Application of Sept 2021, and I object in even stronger terms to this Amendment dated 20 Sept 2022.

My objections are now more in number, and more specific re detail. In no particular order, the main reasons **why I object** are -----

1. **BECAUSE** the compulsory acquisition now means the same size school buildings have to be squeezed into a smaller site, leaving virtually NO open space within the main school ground, other than two areas --- a circulation space labelled “School Common” (mostly pathways) between the buildings Block B and Block D. This BHS is too high despite a slight lowering of the roofline from that of the previous version, and remains woefully under-size for the student catchment already apparent in the Bungendore region, so has virtually no room to grow.
2. **BECAUSE** the Dept of Education’s own projections put the lie to a student cohort of 450 maximum. Their own estimates say 550+ students by 2036, likely way too low. Meantime, the recent Bungendore Structure Plan predicts residential development will double within 10 years – and triple by 2042. The new Elmsgrove Estate is underway right now, with hundreds of family homes about to be built – these are just one extension next to Elmslea, along the other side of Turallo Creek. And that’s just growth around Bungendore itself – other villages in the nearby region are also expanding. The need for a high school in this student catchment is close to exponential. Building one that’s headed for cram-cram-cram before it even starts is a joke. Not good planning.
3. **BECAUSE** the view-line as required by the Southern Regional Design Panel for a vista straight through to Turallo Creek looks good when it’s a straight red arrow on a SINSW diagram – but what you see on the actual the plans labelled School Avenue is obviously intended to be a very fuzzy vista, full of greenery and trees – nothing remotely like the Majara “grid” format and compromise streetscape that the SRDP was trying to retain.
4. **BECAUSE** amendments to the design of the actual school buildings are little more than cosmetic. Hiding behind architectural platitudes and words like “heritage”, “natural” and “environmental” the site plan shows the plain truth. Apart from the existing Palerang Council offices (which remain for school admin) the “amended” school buildings are not much changed from what was proposed last year.

Why I object is --

Sure, there will be slight reductions in “bulk and scale” – a lower roofline and some lesser width in Block A and B, plus a consolidation for Block D now there’s no longer any site extension along Turallo given that the withdrawal of SINSW’s commitment to provide replacement community facilities has removed any need to allow space for a Health Hub, public library and QPRC admin point as in the original plan. But overall, pseudo weatherboards on top, and a drab colour scheme won’t rescue what remains an industrial-style modern building with little “character” and no setting because the site’s too small to allow any.

5. **BECAUSE** the School Avenue is included as part of the student open play space, when in fact its primary role is a tree-lined access-way between school blocks, with very little suitable space, where room for play is more akin to that for a small conversation groups. Even the bike shed/s intrude. The hard surfaces are not user-friendly for play – and indeed in the transport APP-4a for this Amendment, a diagram (p.31) shows vehicular movement to/from the wood workshop, ie across the paving in front of Block A.

A similar objection applies to the spurious claim that this Amendment gives the BHS a full 7,717m² of usable play area, when so much of that claim involves space that’s been fragmented into smaller zones, often just little landscape pockets between concrete-floored, roofed, open-air learning areas – especially on the western side.

The entry area, with those cute steps that ‘could be used for seating’ and brickwork set in concrete – it’s a functional entry, not amenable for play. And even the circular Common is riddled with pathways, leaving very little unbroken green space to play on.

In reality, there are only two areas that can be honestly called open play-space in this Amendment – the first is spare space between Block E (the library) and the courts, and the second, those 2 x fenced-off basketball courts and cricket nets. These are not so very “open” – and really only suitable for the nominated sports. It should also be noted that the court surfaces are specified as concrete, and non-permeable. Again, not user-friendly for secondary students in general play.

Note also that the space available next to the library (and about the same size as that block) should not be assessed as a permanent facility. It’s temporary. Although the size is only about 550m² (600m² at most), SINSW brochures have already shown it as earmarked for school expansion and so it cannot be relied on for long-term calculations.

6. **BECAUSE** in regard to the aforementioned access to Mick Sherd Oval – I note that the school buildings (including their extensions out into open-air learning areas) are to be positioned as close as possible to the school site boundary which will now be a 1m high mesh metal fence. Use of the standard school security fence (close-set iron palisades) will be confined to the western curve of the Common – but the plans show this format somehow appears at various places along main wall of Block B, possibly where there are door openings.

Why I object is --

Whatever the SINSW rationale for this, the end result is random security along a wall of full-height glass windows and doors – and no protection other than a 1m wire mesh fence as division between BHS and the remainder of Bungendore Park.

Though, being Crown land, this strip of land falls outside the subject site of the BHS as such, I also object to the fact that in this Amendment, the western boundary leaves a bare 15m strip between that fence-line and the playing area of Mick Sherd Oval – scarcely enough for a designated player safety zone, much less anything like space for spectators.

8. **BECAUSE** this Amendment talks so much of its use of bricks for external walls at the lower level, as if this will somehow resolve heritage compatibilities. But the truth of the matter is this – there is very little brick wall as such, most of the brickwork being piers and pillar between windows and doors – a “glass-dominant” visual result that is totally at odds with the far more “masonry” format of heritage buildings in the neighbourhood. One view of the diagrams and elevations in the Amendment is that they seem to show that more bricks will be inlaid as borders in the concrete pavement than will be used for the buildings as such. One exception to this may be Block D – a re-located, revised monster utterly removed from any “heritage” harmony.

9. **BECAUSE** in APP 6a of 20 July 2022, the Statement of Heritage Impact (SoHI) is so removed from realities that it seems to put both Bungendore Park and Bungendore Common into one amorphous lump called “the study area” – and then proceeds to dismiss this as of “little heritage significance” or worse, demeans the heritage factor as “negligible”. Where the 2021 version was based on a long list of addresses from the Palerang LEP – this Amendment version now trots out multiple pages on the town history of Bungendore as a settlement – and not a mention of either Park or Common.

As a result, the heritage considerations offered as rationale (ie for both the SSD of 2021 and this Amendment) seem to ignore a key fact -- that Bungendore Park is a major feature throughout Bungendore’s history, dating back to the earliest days of settlement – declared a Dedication in 1884 with this status ratified even further with formal Proclamation in 1886.

And how do I know this ? Because the info can be found this self-same SSD list – notably in APP 18 between pages 60 to 79, reproducing old maps and gazettal notices. It even includes one original map dated 1889 which identifies Bungendore Park as a town “SQUARE” for Public Recreation. And with unforgivable irony in this objection, I note that App 18 is the Contamination Report. If technical boffins at Douglas Partners can find, and include, such information then the lack of it in a so-called professional Report is unforgivable and discredits the entire Heritage Study.

The Park’s historic credentials are beyond dispute.

The dual recognition mentioned above is an extraordinary accolade to the importance accorded Bungendore Park 130+ years ago – and should be a powerful pointer to its heritage status today.

Why I object is --

Arbitrary dismissal as the Park as if of secondary and/or optional heritage value is not just a major failure for both this Amendment (and indeed the whole SSD) – it is also means self-contradiction in this latest SoHI itself, which on p.26 does mention the proclamation, and on p.28 notes it was set aside as a reserve in 1837. There are even two old maps. So it beyond perverse to then persist in finding the equivalent of nil-heritage equals nil-impact.

10. **BECAUSE** there are even more contradictions to object to. See how p.9 in this SoHI identifies the “civic centre” as including the police station, post office, public school and railway station – and refers to this group as “the study area’ indicating links with another 10 heritage items nearby. It even admits there are few two storey buildings. But then, it cites just the Common and/or Park as “the study area”. This ambiguity is not resolved. So where does Bungendore Park sit in relation to these places ? Geographically, just across the road ! But, nowhere in the same heritage group according to this SoHI.

Only a case of severe dissociation blindness could fail to see historic connections between Park and its neighbours – yet the while the latter are hailed as heritage rich, the historic heart of this entire area, ie 185yo Bungendore Park, is not even identified as Crown Land, let alone in that rare category as “dedicated”. Indeed, this great space is belittled as so undeserving that even its role as curtilage to the War Memorial can be rubbished, and should be “reduced”. The disrespect is palpable – utterly objectionable.

11. **BECAUSE** there’s more. In p.37 this SoHI goes on to insist that so far as Bungendore Park is concerned, it’s “not considered a significant heritage item” because “no built heritage will be demolished, removed or changed” by the changeover to BHS – without a thought that maybe a Park is not a “built” item in the first place. And not the slightest consideration of the adverse impact that arises when you chop off the top of a heritage town SQUARE so it loses its shape – and a whole street frontage to boot.

12. **BECAUSE** this SoHI then adds the crazy claim that “no significant views will be impacted” - despite the fact that the new BHS (even in its slimmed-down Amendment version) will add a whole new 200m wide 2-storey high horizon to the entire eastern end Bungendore Park. The combined shape and size is so out of keeping with the low-scale of other buildings nearby that it will visually dominate the entire neighbourhood, and impact on this area irretrievably – probably forever.

Perhaps the SoHI should have checked out what the SRDP thinks about impact on views – that body made a major issue re maintaining the view through to Turallo Creek as a way to continue some connection with the street grid pattern despite the loss of Majara . Pity the SRDP didn’t consider an even more adverse impact when viewed from the west.

As a PS to these heritage comments, I also object to the way this SoHI rejects heritage claims for the Park and the Common because they are not included in the so-called Bungendore Heritage Study of 2018 – when, and for whatever reason, that study explicitly excluded parks and memorials from inclusion.

Why I object is --

13. **BECAUSE** the Common is as old as Bungendore Park – and in its own way as valued, and used, by the people of Bungendore. Yet on p.37 this SoHI dismisses the Common as “simply unutilised open space”. The adjective might be a tad better than 2021’s heritage description of the Common as weedy and waste ground – but it’s still not true, and smacks of a report based more on google maps rather than real life experience with people who use it.
14. **BECAUSE** of the traffic and parking problems involved. I’ve lived in Bungendore, just the other side of the railway. I know first-hand what a bunfight it is to be driving anywhere near Gibraltar St when it’s school time for Bungendore Public School. And if it’s bad enough now, adding another 450 student across the street is going to be chaos. And the information in APP 4a Transport Assessment Addendum doesn’t come close to understanding lived experience.

It’s not just the number of cars or students – it’s also what’s happening with the road pattern. I particularly object to the way that roundabout planned for the BHS entry is going to be a traffic chokepoint. Why? Because, thanks to the entire deletion of Majara as a roadway, what was a T-intersection with several ways in/out now becomes a single L-shape turn, complicated by the school entry itself.

15. **BECAUSE** I also object to the parking plans re Turallo Terrace. First – a bit of background. The closure of Majara St means that all the cars that would currently use this stretch of road to make a right hand turn down toward McCusker and up into Elmslea (and soon the developing area of Elmsgrove) will now have no option but to drive through this section of Turallo. No Majara – no right hand turn.

Doesn’t matter whether the cars come via Butmaroo, Ellendon, Molonglo St or Tarago Road – if they want the nearest way to head north/east then it’s through this Park section of Turallo Terrace, around the curve and downhill to McCusker – and let’s hope the creek’s not up because this dip is at the bottom of the Common, and very flood-prone.

Given the above, I totally object to what this Amendment proposes – namely, that school parking should concentrate itself along this section of Turallo – **six kiss’n’ride** plus 98 car spaces. All these are to be 90-degree angle parking on both sides of the road, and where there’s long-established Pre-school Childcare Centre for 45 toddlers GO now working on plans to double that or maybe even 100+ places.

The whole scenario of reverse parking (in or out) is not only unsafe for children – it’s a clumsy manoeuvre even for skilled drivers, and can be dangerous - a recipe for disaster and delay on what’s soon to be such a busy stretch of road.

Please note that I also object to the arrogance of an SINSW that assumes it can just plonk any level of parking on any public road – whatever.

Why I object is --

The one saving point in this Turallo turmoil is that it IS a public road and not part of the BHS site or this SSD. Therefore, SINSW cannot compel QPRC to agree to anything, and this assessment cannot condition any consent in a way that might coerce co-operation or agreement of another party, Council or otherwise.

My objection/comments here apply equally to the southern side of Majara, to Gibraltar (including the roundabout) and to Butmaroo.

16. **BECAUSE** the pedestrian access mentioned in my BECAUSE [5] points to the fact that this is a TWO-PART school, and that what divides them is this busy road – which will get even busier, thanks to the closure of Majara St along that side of Bungendore Park. I object to both the dis-location and danger this presents for the students, and laugh at the suggestion that somehow a wombat crossing is going to resolve the issue.

Assessors should also note that such separation is not just contrary to Dept of Education Guidelines, but actively recommended as something to be avoided like the plague other than where long-standing (ie last century) locations cannot be altered. Yet here, in Bungendore, in a township with numerous greenfield sites, SINSW is going out of its way to CREATE such a contrary situation, with so many adverse impacts for kids as well as community.

17. **BECAUSE** this addendum has no recognition of any social impact from the fact that the whole 4,500m² of land compulsorily acquired by SINSW is a triangle being taken straight out of the heart of the Common – the best land, totally fenced off and leaving the leftovers of levy and flood-prone land along the creek for “public recreation”.

Moreover, the existing pull-in chicane for dog-owners to park in while they’re using the off-leash area is now shown as transformed into an actual driveway into the rear of the Ag-plot area. This means alternative parking arrangements will need to be provided for public users – the roadway is definitely too narrow for stationary cars. The dis-possession is legal chicanery. It’s certainly bad planning.

In terms of “social impact” this treatment of the Common is arbitrary, bureaucratic and an insult to the entire Bungendore community. It is not in the public interest – and not even good practice for a new High School. I object vehemently

18. **BECAUSE** the original Social Impact Assessment still stands as APP 11 notwithstanding the many basic errors involved (BHS tennis courts instead of basketball, denigrating the Common as wasteland etc), and arriving at a fatuous conclusion re no impact.

However the new APP 11a from URBIS ADDENDUM has a more realistic approach. It has clearly read the analysis by Micronex Research regarding community response to the SSDA Exhibition a year ago, and recognises that the current scenario is a quagmire of adverse social impacts. In trying to find a way out for SINSW. It now seems the name of the game is blame Council.

Why I object is --

19. . **BECAUSE** suddenly all the promised community facilities have fallen through, and the community is left with a classic bait'n'switch situation where SINSW gets the Majara/Park site and the Common – but the community is left with nothing buty trying to make the best of a bad job. Adding insult to injury is the imminent arrival of BHS demountable classrooms taking over the primary kids playspace – while they're exiled out and over the road onto Mick Sherd Oval.
20. **BECAUSE** suddenly it's QPRC's fault that compensation matters re that compulsory acquisition have not been settled, that any finality seems to be far away. Yet QPRC is suddenly supposed to be responsible for finding replacements for those promised community facilities that now have to be indefinitely delayed.
21. **BECAUSE** suddenly it is QPRC's fault that there are negative impacts as a result of the SINSW resort to compulsory acquisition of the various sites. Allegedly, Council is the reason it needs rush into a new admin building, and do replacements for pool, community centre, as well as sort out on-street parking for a BHS that can't even comply with its own Dept guideline about on-site parking – a matter the Bungendore community is well aware of after similar issues at Jerrabomberra's new school.
22. **BECAUSE** suddenly, there are “no guarantees” that can be reported in the SSD Amendment because it's impossible for QPRC to finalise anything in regard to expenditures like that for an alternative swimming pool at the Sports Hub when finalising compensation seems to depend on legal procedures that wend their way towards whatever level of finalisation may eventuate.
23. **BECAUSE** there are external but associated issues like the Abbeyfield Aged Care facility, effectively abandoned as unwitting victim in the SINSW acquisition takeover, while Scouts may lose their new \$90K car-park, as well as their promised Shed – being now disowned by SINSW with APPs variously re-assigning it to a spot right in front of the Scout Hall, and referring to this as something to be dealt with by other parties in separate development “pathway”.
24. **BECAUSE** as a ratepayer I'm only too aware that QPRC scarcely has spare cash for books, let alone a whole new public library or community health facility. I totally reject the blame-shifting that concludes this Social Impact Addendum, and object to the bureaucratic bullying that allowed it to be written in the first place.
25. **BECAUSE**, as a result of the above, I also reject any suggestion that QPRC should be required to help extricate SINSW from the BHS mess of “unanswerables” as revealed in this Amendment. I urge the Assessors to be steadfast in ensuring compliance in full with all protocols required for good Planning – especially those related to what can, and what can't, be conditioned when it comes to Crown land, Council-owned land, shared use, shared space, and any 3rd /other party agreements.

CONCLUSION.

Although there are so many other aspects that could be raised as objections in regard to this Amendment, I hope this is enough to assist re Assessment of SSD 14394209.

I repeat – my prior Objection to 18 Oct 2021 still stands. But while it was focussed on site-selection, this 2022 submission concentrates on issues that arise specifically from documents and findings in the current Exhibition – that is, on what the outcomes may or may not mean in real life.

If out of this, the BHS location becomes an issue, it's a direct result of the simple fact that it is the site itself which site gives rise to problems in the first place. But the main consideration remains that of PLANNING. – not just letter of the law stuff, but planning in overview for the public interest. As the EP&A says –

1.3 Objects of Act


The objects of this Act are as follows—

- (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,
- (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,
- (c) to promote the orderly and economic use and development of land,
- (d) to promote the delivery and maintenance of affordable housing,
- (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,
- (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),
- (g) to promote good design and amenity of the built environment,
- (h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,
- (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,
- (j) to provide increased opportunity for community participation in environmental planning and assessment.

These aims should be paramount in every SSD. I believe this SSD fails most of them.

This is my personal submission on how and why I object. Thank you.

Yours sincerely



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