

## **SOCIAL IMPACT ASSESSMENT: RESPONSE TO KEY ISSUES LETTER**

### **New high school in Bungendore**

## **1. INTRODUCTION**

This statement accompanies a revised submission report in relation to the state significant development (SSD) for a new high school in Bungendore (SSD 14394209).

### **Background**

In September 2021, Urbis Pty Ltd (Urbis) prepared a Social Impact Assessment that accompanied the Environment Impact Statement (EIS) for the new high school. The EIS was exhibited by the NSW Department of Planning and Environment (DPE) from Monday 20 September 2021 to Monday 18 October 2021.

During exhibition, several agency and community submissions were received. Following exhibition, the DPE issued two requests for information (RFI) dated 18 November 2021 and 24 December 2021. The proposal for the high school was then modified to reflect responses to the RFI as well as changes to shared use arrangements on the site. An SIA Addendum report was prepared to address the changes in design and the comments raised by DPE in the 2021 RFI. The SIA Addendum Report was lodged to DPE in September 2022.

Since lodgement of the SIA Amendment Report, DPE provided an additional RFI Key Issues Letter dated 26 October 2022. The letter provided several comments on the original SIA, which was lodged in September 2021.

### **Purpose of this statement**

The purpose of this statement is to address the DPE comments on the original SIA, as provided in the RFI Key Issues Letter dated 26 October 2022. This statement is considered adequate to address the comments provided by DPE and, as such, a revised SIA was not considered necessary.

## **2. SIA RESPONSES TO KEY ISSUES LETTER**

The following table outlines the responses to the RFI Key Issues Letter as relevant to the SIA.

Table 1 Response to key issues letter

<b>DPE comment</b>	<b>SIA response</b>
Update the proposed mitigations in accordance with the Social Impact Assessment Guideline 2021. Mitigations are required to be tangible, deliverable by the applicant and likely to be durably effective.	All recommended mitigation measures (including those in the original SIA and the SIA addendum) have been developed in consultation with the applicant and have considered the guidance outlined in the DPE SIA Guideline Technical Supplement, 'Factors to consider when developing mitigation measures' (15: 2021). Aligned to the guidance provided in the Technical Supplement, multi-stakeholder measures have

DPE comment	SIA response
	<p>been proposed where responsibility of the impact lies partly with other agencies. In these instances, mitigation measures have still been provided for the applicant to advocate and utilise their position to the extent possible to enable the delivery of these measures by another agency.</p> <p>If mitigation measures could not be committed by the applicant or be reasonably effective in reducing the extent of social impact, they have not been included in the SIA report. The residual impact rating reflect this.</p>
<p>The terms 'social locality' and 'area of social influence' is used inaccurately in the SIA. The SIA guidelines require the social locality to be identified and analysed, which correlates with area of social influence in international guidelines. However, the SIA has separate sections on each of these concepts, Sections 4.1 and 4.5. Revise the SIA to correct the terms use and provide a social locality map to support your conclusion.</p>	<p>The DPE SIA Guidelines state that there is "...no prescribed meaning" (16: 2021) to a social locality and that the "the term 'social locality' is similar to 'area of social influence' that is commonly used in SIA practice" (ibid).</p> <p>The DPE SIA Guidelines outline six concepts to consider in the development of a social locality which informed Sections 4.1 and 4.5 of the SIA Report dated September 2021.</p> <p>For clarity, the content provided in Sections 4.1 and 4.5 have been combined and renamed as 'social locality' and is provided in Section 3 of this statement. While the SIA Guidelines do not stipulate that a map be provided, a social locality map has been prepared to satisfy this comment and is provided in Section 3 of this report.</p>
<p>The social baseline is required to be revised to detail the social context of the site and surrounding area. Please provide the:</p> <ul style="list-style-type: none"> <li>▪ (1) current need for the development, including the number of students in the new school catchment, breakdown of the number of students currently attending private and public schools and the current travel modes and trip times</li> <li>▪ (2) existing operation of the social infrastructure currently</li> </ul>	<p>Response to each comment as follows:</p> <p>(1) Section 4 Social baseline of the original SIA provided several points of evidence which outline the need for a new school in Bungendore. This includes:</p> <ul style="list-style-type: none"> <li>– An explanation of the education context in NSW and the ACT, including changes to the Memorandum of Understanding for Regional Collaboration and enrolment data from Queanbeyan High School</li> <li>– A summary of key community consultation outcomes which outline the sentiment for a new school in Bungendore</li> <li>– A policy review which outlines the direction for a new secondary school in Bungendore as stated in Council's Local Strategic Planning Statement 2020.</li> </ul>

DPE comment	SIA response
<p>on the site, including operation times, and the nature and extent of the users, including vulnerable users (if any)</p> <ul style="list-style-type: none"> <li>▪ (3) public transport in the social locality to inform accessibility of the social infrastructure and future access to community use of the school.</li> </ul>	<p>All publicly available enrolment and catchment data has been included in the SIA as appropriate. The Department of Education cannot release 2021 – 2036 Enrolment Projections for NSW Government Schools as it is Cabinet Information. This information has been sought through a GIPA request and the decision that this data is Cabinet Information has been upheld. The SIA is therefore unable to include any further enrolment or catchment data.</p> <p>(2) Operational and user details of the existing social infrastructure on site has been included in Section 3 of this statement. While not formally written in the original SIA, this information had informed the assessment of social impacts and therefore no changes are required to the impact assessment.</p> <p>(3) A summary of public transport connections to the site has been included in Section 3 of this statement. This information was already included in the Traffic Impact Assessment (TIA) undertaken by GHD to accompany the proposal. No changes are required to the social impact assessment.</p> <p>The GHD report was reviewed to inform the scoping of social impacts in the original SIA, and is cross referenced in Section 6.8 of the SIA.</p>
<p>Update the SIA to include details on the extent and intensity of the social impact of the closure and interim relocation of the community centre, swimming pool, library and Council service centre.</p>	<p>The original SIA and the SIA addendum assessed the social impact of the closure and interim relocation of all facilities identified by DPE.</p> <p>For clarity, this is addressed in Section 2.1 and 2.3 of the SIA addendum, as well as Sections 6.3, 6.4 and 6.5 of the original SIA.</p>
<p>Noting the proposal no longer includes the provision of new community facilities on the site, the Department encourages Community Use Arrangements of the school. Consider sharing the</p>	<p>The SIA addendum included a recommendation in Section 2.3 for the Department of Education to “Implement joint use arrangements for community use of school facilities outside of school hours. This could help contribute to meeting some of the need for a community centre in town, while relocations</p>

DPE comment	SIA response
school facilities with the community and update the acoustic assessment to consider out of hours community use as necessary.	plans are developed by Council" (15: 2022). A similar recommendation was also provided in the original SIA.  As this comment had already been addressed in the SIA addendum, no further action is required.

### 3. REVISED SOCIAL LOCALITY

Bungendore is a relatively compact town which is oriented north-south and bisected by the Kings Highway. The grid pattern of much of the town reflects its original settlement pattern. Newer residential areas have been developing on the northern and southern fringes of the town.

The site is located in the Bungendore town centre, in the vicinity of Majara, Gibraltar and Butmaroo Streets and Turallo Terrace. It includes land parcels east and west of Majara Street and north of Turallo Terrace. The site is currently occupied by various community, recreational and civic facilities. These facilities include Mick Sherd Oval, Bungendore Pool, Bungendore Community Centre, part of the Turallo Terrace dog off leash area and the Bungendore offices of Queanbeyan-Palerang Regional Council.

The operational details of these facilities are summarised as follows:

- **Bungendore Pool:** operates seasonally from November to March. During this period, the pool is open from 11:00am – 6:30pm each day, with earlier opening times (6:00am – 8:00am) on Tuesdays and Thursdays. Annual usage rates for Bungendore Pool are not publicly available however, given the localised nature of the pool, it's expected that most users are from Bungendore suburb.
- **Bungendore Community Centre:** provides three rooms to hire, seven days a week from 5:00am – 10:45pm. Annual usage rates for Bungendore Community Centre are not publicly available. Council's website notes that the centre currently hosts before and after school programs, community groups, health practitioners and other functions. A maternal, child and family health service also operates from the centre during weekdays. A desktop review of Council's online booking system indicates that the centre has availability most days of the week, with one room of the centre typically hired on a weekend for part of the day.
- **Bungendore offices of Queanbeyan-Palerang Regional Council:** opens from 8:30am – 4:30pm Monday to Friday for customer service enquiries.

The site is also located close to other significant community facilities, including Bungendore Primary School, Bungendore Library, Bungendore Police Station and Bungendore Park Tennis Club. The Bombala rail line between Sydney and Canberra runs close to the site, parallel to Majara Street, with the Bungendore Station located immediately to the south-east.

The site is typically accessed by car. The Traffic Impact Assessment (TIA) undertaken by GHD to accompany the proposal indicates there is some public transport connections to the site, with the QCity Transit providing bus services around Bungendore. As noted in the TIA, the 844/D811 bus service operates between Bungendore and Queanbeyan, with bus stops located on Gibraltar Street between the oval and the existing primary school. The TIA identifies that there are three weekday bus

services from Bungendore to Queanbeyan and two weekday services from Queanbeyan to Bungendore.

Bungendore Bus and Coaches also provides a school bus service for Bungendore Primary School. This bus service routes to nearby towns including Wamboin, Tarago, Hoskinstown and Butmaroo.

Figure 1 Site context



Source: Urbis

Considering the site context above, as well as the demographic data and engagement outcomes provided in the original SIA which accompanied the proposal, the area of social influence is mostly confined to Bungendore, with some influence on the broader LGA. This is shown in Figure 2.

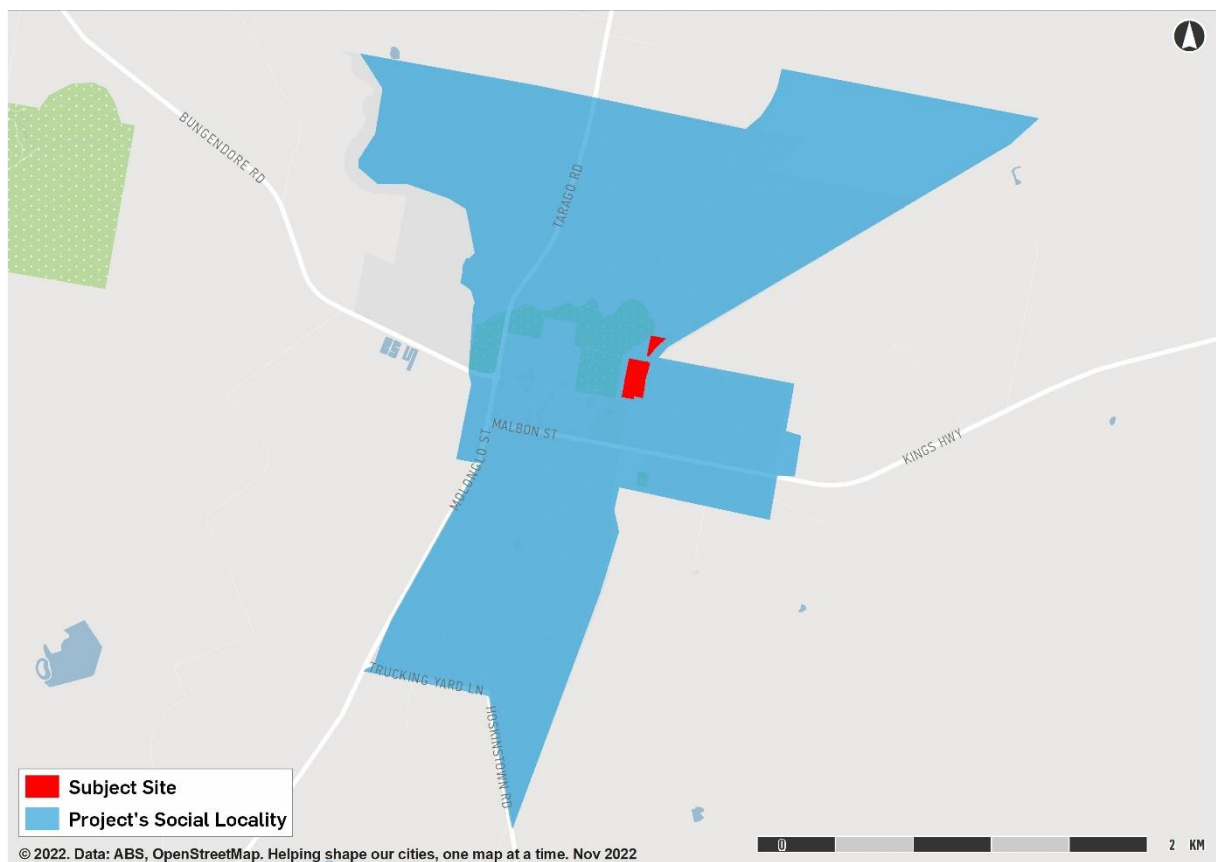
Within the social locality, the following individuals and communities are likely to be impacted by the proposal:

- Local Aboriginal community
- Current and future secondary students resident in Bungendore
- Users of Mick Sherd Oval, Bungendore Pool, Bungendore Community Centre and Turallo Terrace dog off leash area
- Current and future Bungendore Primary School students, staff and visitors



- Current and future staff, users and visitors of Queanbeyan-Palerang Regional Council building
- Other Bungendore residents
- Queanbeyan-Palerang LGA residents.

Figure 2 Social locality



Source: Urbis

#### **4. CONCLUSION AND CREDENTIALS**

The information provided in this statement is considered adequate to address the comments raised by DPE in the Key Issues Letter and does not change the impact assessment provided previously in the original SIA or addendum SIA.

This statement was prepared on 17 November 2022 by:

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A handwritten signature in black ink, appearing to read "R. Trigg".