

EBM ANALYSIS --

BLUE: Leeson Text of 1 Dec 2023

Black: EBM comments late-Jan – mid-Mar 2024.

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Bungendore High School

Site Selection Process Review

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1 December 2023

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Introduction

Bungendore High School - Site Selection Process Review

The purpose of this report is to provide an independent review of the new Bungendore High School (BHS) site selection process. It has been commissioned by School Infrastructure NSW (SINSW)

It has been undertaken prior to granting of planning approval and detailed commencement of construction procurement to review whether appropriate and robust site selection processes were adopted and executed.

Check the title. This is a PROCESS Review – ie, of site-search PROCEDURES, as in “robust site selection processes” with end-date for these as at “August 2020”. It is NOT intended as evaluation of site Merit, nor does the Reviewer touch on functional site aspects. Yet the final conclusion is in terms of SITE assessment. This is a fundamental FAIL.

Check the timing. Stated aim is to see, in late 2023, “whether” the 2020 site selection processes were “robust” and “appropriate”. Neither adjective is achieved. The word “adopted” suggests some specific plan. Yet only one was officially ‘adopted’ – that of a standard site-search via EOI.

Note that plural “processes”. It also misrepresents reality. As this Review reveals, parallel to the EOI were contrary dealings with QPRC by a certain segment of SINSW. These stayed undercover for months. They were never “adopted” as a site-search procedure.

No reason for such late assessment, well over three years later, is given other than to note that it is being done “prior to granting of planning approval and detailed commencement” – neither which can be altered by anything which occurred years earlier. It should also be noted that at least 6 months earlier, in April-May 2023, a 12pp SINSW Brochure re “Bungendore High School Site Selection Process & Findings V 1.2” was being drafted, and released by early July.

So the big question is why ANOTHER one, and WHY NOW ? Who or what needs to be validated so long after 2020 ? Does this indicate second thoughts ? Or was SINSW seeking a fallback position for when a certain (unmentioned) LEC decision was to be handed down ?

The Leeson Review purports to be “independent”. The following analysis undermines any such claim. The first doubt starts with fundamentals - it was commissioned, backgrounded, briefed, document-controlled, vetted and paid for by SINSW. As facts soon show, the content seeks to either re-imagine, or to rationalise some dubious double-dealing in the site-search ‘processes’ - by SINSW.

Throughout, actual Review text is indented and in blue, followed by equally ‘robust’ EBM comments in black. NOTE: *wherever possible the acronym PDNSW is used.*

Methodology

The review has been undertaken as a desktop exercise examining documents prepared by School Infrastructure and Property NSW, documents submitted under Standing Order 52, correspondence from Queanbeyan Palerang Regional Council (QPRC) and relevant minutes of QPRC meetings.

A “desktop exercise” is only as good as the documents provided for consideration.. The list included by the Reviewer has, by her own admission, been pre-selected and “prepared” by SINSW. See mention below re Carlo Bellinato “assisted in the sourcing” – an egregious conflict of interest.. Thanks to GIPA there are also emails with mid-Dec dates that suggest even the cover-date of 1 December 2023 is a fabrication.

Even the document list provided as Attachment A shows that as an “independent Review”, this is a major FAIL. Thanks to GIPA, the community has copies of key documents in the relevant period, and can SHOW what’s missing – and with ‘site search’ titles so SPECIFIC that the gaps can only have been by deliberate omission.

For instance, these three. All are key milestones in the official EOI process.

[Note names Development & Transactions [DPIE] are also “Property NSW”, aka PDNSW]

- **January 2020** Site analysis Bungendore — Development & Transactions [DPIE]
- **February 2020** Bungendore High School Site Search – Summary Report Development & Transactions [DPIE]
- **March 2020** – Bungendore High School Site Search – Summary Report Development & Transactions [DPIE]

The mid-January analysis identifies THREE possible locations – “Darmody”, “Tarago Rd” and “East Bungendore”. Information includes photos and facts gathered from actual site-visits by PDNSW staff, ie Property NSW. The text for each site refers to more information in an “EOI Evaluation Spreadsheet”. None of this is mentioned in the Review.

The February Report takes up this shortlist of three sites and goes into much more detail. It’s possible this relates to DGS20/333 of 17 Feb 2020 in the Leeson List. If so, the Reviewer ignored its findings.

The March Report covers all EOI work to date, including on p.8- a chart assessing suitability of seven GOVT sites in the Bungendore area, ie Council-owned land and Crown land reserves.

Investigating available govt-owned sites is the “standard” first step in a PDNSW site-search process re schools. For the BHS project, this had been completed in Oct 2019, with all ranked as “NOT SUITABLE”.

Meantime, access to p.4 of this March Report, would have informed the Reviewer that the Taubenschlag site, ie Tarago Rd --

“satisfied the site size criteria and was considered to be superior in location and characteristics relative to the other submissions. The EOI evaluation panel therefore recommended that DoE proceed to the next phase...”

Instead, the Review remains in ignorance, and blithely dismisses this EOI-selected recommendation as barely adequate, if that.

To put it bluntly, these are not only official EOI site findings, but they are KEY milestones in the site-search PROCESS. The Reviewer’s obvious un-awareness and lack of any mention, in and of itself invalidates this as a “Site Search Process Review” and undermines any validity re findings in this so-called independent review.

Other major omissions will be identified as this analysis proceeds. They lead to an inevitable conclusion – that, as listed in Attachment A, the sources used for this Review are so deficient as to be culpably misleading.

In conducting the review, interviews were held with the Chief Executive of School Infrastructure and the local MP, Mr Steve Whan.

Two big questions arise here – the WHO, and the WHY.

The Chief Executive of SINSW (Anthony Manning) may have been in charge, but if the Leeson narrative is accurate, he was not active in any site-search processes. Worse, Mr Steve Whan had NO connection at all. As a late-entry candidate in the NSW State election of March 2023, his contemporary knowledge of this site-search is NIL. He may be interested in this BHS project now, but he was NOT actively involved in any known way at the time.

The Review cut-off date of Aug-2020 is a full 2 years 5 months BEFORE Mr Whan was elected – and that event was marked by a change of Government. Other than reporting what the (new) Minister, or the Department of Education (DoE) may have told him, Minister Whan had no known association with BHS as such. But we do know that from about April 2023, he liaised with SINSW’s Carlo Bellinato re the April drafting of that 12pp July brochure, larded with spurious assertions that Tarago Rd was shortlisted as “the least, worst site” - thus rejected.

After being fed fake claims derived from SINSW’s self-serving version of corporate memory, Minister Whan knows nothing that could add relevance to this Review.

A review commencement briefing was provided by School Infrastructure executives. Carlo Bellinato (Senior Project Director, Infrastructure Delivery) assisted in the sourcing of documents requested and provided additional background information.

The review covers the period from late 2018 when a new high school for Bungendore was announced to August 2020 when the selected site was announced.

See prior comments re conflict of interest re Carlo Bellinato, a skew exacerbated by personal fact-filtering inherent in providing “*additional background information*”. As “*Senior Project Director*” Carlo Bellinato was not just ‘in’ Infrastructure Delivery, he was the SINSW exec DIRECTLY responsible FOR delivering the BHS project for SINSW.

This intro section reveals just how far the Review relies on Carlo Bellinato. He got it started, with the “*commencement briefing*”. He “*assisted*” the Reviewer “*in the sourcing of documents*” – a major point of info-control. Given the volume of docs in the multiple boxes delivered by the Standing Order (SO-52), filtering and selecting specifics from this mass of documentation would be a major factor in what information was available – and just as important, what was overlooked, withheld, misrepresented, or ignored.

It has not examined the Final Business Case, subsequent formal site acquisition processes for the selected site or concept plan refinements. Nor has it reviewed any of the processes pertaining to unsolicited proposals made after August 2020.

A schedule of the documentation reviewed is at **Attachment A**.

Basically this says – it was a very narrow Brief, and we kept to it. As for the opening oops that this Review “*has not examined the Final Business Case*” – there’s a good reason why. Because NONE EXISTS, and definitely none in the Leeson Review period.

Here’s what it says in a formal GIPA report #21-809, of 2 Dec 2021 – in effect, ‘*sorry, there’s no such document*’. It’s not that for whatever reason, a business case is there but ‘*can’t*’ be provided – but that **there is NONE**.

Rachael Chan,
R/Executive Director
Business Enablement, School Infrastructure NSW
Date: 2 December 2021

□ Item 8 (amendment deleted the word “memo”) - Any briefing recommending the selection of the Bungendore Park site for the Bungendore High School

Our reference: GIPA-21-809

Information not held

Information in relation to Item 8 **is not held**. School Infrastructure conducted searches and confirmed on 17 November 2021 that **no briefings relevant to the request could be located**.

Yet this Reviewer somehow manages to CONCUR with a selection document that does not exist.

Note also, by mandating that any details after 20 Aug 2020 must be ignored, SINSW not only excludes any details of “*formal site acquisition*” but also any consideration of a later, and eminently viable, “*unsolicited proposal*” at Trucking Yard Lane.

Looking at this location was triggered by major Council and community concerns, and some desk-research was done in early 2022, months BEFORE the final site selection had been legally finalised. A concept plan for BHS site-use was prepared, but never given the detailed consideration it deserves..

By restricting this Review to ‘processes’ (ie not outcomes or results) and adding an arbitrary time-frame ending “*when the selected site was announced*” SINSW conveniently prevents the Reviewer from considering so many other aspects in the ‘site selection process’ including local know-how, community input, adverse impacts, and unintended ramifications.

This is wilful misdirection in more ways than site-timing, because the date of that media announcement by then-Member for Monaro JOHN BARILARO was 14 August 2020, a fortnight before any FORMAL Proposal had been prepared for presentation at the QPRC meeting of 26 August.

The Reviewer omits any mention of Barilaro by name, or date, and seems to take his announcement as a mandate re site selection. Yet it was about a ‘surprise’ area (Barilaro’s own rationale) and at odds with what had been ‘searched’, ‘selected’ and ‘recommended’ months earlier by the govt’s own property professionals. The media spin totally ignores that THAT site was in the final stages of the site-search PROCESS, ie due diligence and contract preparation.

According to SINSW emails of June 15 and 26 June 2020 (in the Leeson List, but copies attached) PDNSW’s due search process had nothing to do with the Barilaro BHS site. This came after a sudden change of mind - that ‘NOW’ Mick Sherd Oval would be the ‘preferred’ site. There’s nothing about any selection ‘process’ in the word ‘preferred’.

It should also be noted that some outline of site shape, size and open space configurations were given to QPRC Crs in secret session on 8 July 2020. The Leeson List dates this proposal as 3 July, just one week after the bombshell decision of 26 June, so nil time for any real site-search ‘process’.

The so-called site-selection was, at best, a concept LOCATION. Moreover, it wasn’t based on ‘search’, but a SITE STRATEGY supposed to speed construction and/or save time (both were said in Barilaro’s announcement!) by land-grabbing govt-owned land from COUNCIL.

Doc DGS20/1481 (this assumed to be late June) is the first indication of any “search process” re the Mick Sherd Oval site as ‘preferred’. At his stage, SINSW had no clue re legalities involved, and still thought QPRC could sell off Crown reserves as ‘operational’. Are these relevant Council papers in the Leeson List ? No.

The Review takes everything on trust. It fails to realise that no matter how solid the site-switch, SINSW’s non-EOI site-search process was so shonky that after 26 June, there are just 3 docs about it in the source list –on 3/7, 10/7, and ‘assumed’ July. There’s nothing else before, and mostly promo stuff after, although site shape/content was re-configured several times between 26 Aug and 28 Oct 2020, with further revisions a year later, after the first phase of SSDA Assessment in Sept-Oct 2021. So much for the Aug cut-off date.

“Search Process” assessments don’t appear until long after Aug 2020, therefore irrelevant re the terms of this Review. However, it is worth noting that these self-justifying fictions seem to have started soon after the NSW State election of March 2023. [NB - as analysed later, the July doc named DGS20/2119 is about people, not sites; while the doc re Murrumbateman is so removed from the BHS xscenario as to be waste of space.]

Even the map-changes prove how UNcertain actual ‘site’ selection was in mid-2020.

In the cut-off period up to Aug 2020, the maps were showing that BHS would take over the WHOLE of Bungendore Park, that Majara St would STAY open, that the Stationmaster's backyard would be halved, that while the Community Centre would be re-located, the QPRC land there would remain OUTSIDE the School, and Abbeyfield would move sideways to occupy that adjoining lot.

Indeed, the 11pp presentation of 25 Aug 2020 as delivered to QPRC Crs next day (see Leeson List doc for 26 Aug 2020) is a giveaway as to how 'wish-think' it still was at that date – a self-described mish-mash of multiple lots, 7 titles, 3 owners, and complexities galore--

“the proposed school site will require joint-use agreements, subdivision of sites, leases, easements registered on title, a road closure, a pending Development Application to be rejected by council, closure of public facilities, rezoning of land, and possibly a Planning Proposal for the reclassification of land under the Local Government Act.”

The presentation text even talks of needing to get D&T to do further investigation.

In short, a LOCATION had been picked, but not a SITE selected – and a long way still to go before any formal site-search process was complete. This is pivotal information re how the 'process' is progressing. It's something a Reviewer surely needed to know.

But does this document appear in Carlo Bellinato's compilation for the Leeson List ? NO.

At that Council meeting of 26 Aug 2020, the whole plan was so unfinished it could only be accepted “in principle” ie for further QPRC discussion. This did not occur until 28 Oct 2020.

It should also be noted that this cut-off date conveniently constrains the Reviewer to avoid any mention of the issues arising from that June-July-Aug pseudo-selection process when the only “search” activity was in seeking ways to justify that one surprise location

At that stage, two key areas of the “selected site” were Crown Land, and subject to the Crown Land Management Act 2016 (CLMA). The legal ramifications of this have been huge. Such status should have been a major factor in any site-search and selection process. The DoE Guidelines stipulate that legalities are ESSENTIAL site-search considerations.

Preventing any consideration of legal factors that should have been fundamental in the 'site-search selection process' is fatal flaw. Such error should have been at least acknowledged. Instead, this Reviewer seems to be utterly unaware of the words “Crown Land” let alone that law as a selection issue, either for the 2020 timeframe, or later. The concurrence shown by declaring the SINSW 'preferred' site as “superior” is powerful proof of inadequate briefing.

More significantly, the SINSW cut-off ploy strongly suggests that the underlying aim of this Review is belated self-justification for decision-makers now faced with on-the-ground reality, ie 2023 outcomes, and how to dilute the folly of prior flawed decision/s.

Key Findings

1. The site selection process was rigorous and followed established School Infrastructure processes

In its EOI process of 2019-20, the site-search by PDNSW was rigorous, and did follow established procedures for school site search and selection. .

This ran with full professional focus from Oct 2019 until being arbitrarily abandoned in mid-June 2020. In contrast, SINSW imposed a pre-determined decision to go with a site selected by PREFERENCE, not by search. There was no EOI, and no biz-plan, nor any scope for considering pro's and con's, much less comparing options or alternatives.

The Leeson List for this phase reveals a patchwork of problems and slipshod make-do's. Add to these, information available through the SO-52 files, and you have a recipe for unintended consequences, where trying to resolve one misstep leads to three more.

Even in Aug 2020, the SINSW process was already so far removed from "established" procedure that it ignored (or distorted) the BASICS of site selection in DoE's own GUIDELINES for a Regional High School.

While minor variation is possible, disregard or major divergence is not. Compliance with these Guidelines is NOT an optional extra – it's part of "*established School Infrastructure processes*" – and SINSW would know this.

Consider the contradictions. Where the Guidelines call for a simple SINGLE site, or adjoining lots which CAN be consolidated into one, and one with obvious boundaries – the SINSW 'preferred' site is not only multi-lot and multi-owner, it is permanently split by the physical barrier of a busy public road called Turallo Tce. [Not safe for kids either.]

Proximity to a railway is listed as another big reason for rejection. This is for both 'near' as well as 'next to'. Yet the selected land shares an open-palisade metal fence with a site-history known (even in 2020) to be at risk of lead contamination. And why castigate the PDNSW recommendation for needing to be re-zoned (a relatively mundane procedure) when the 'preferred' site/s not only meant demolishing a much-loved community swimming pool, closing a much-used public road, but involved one area with the added complications of being subject to an unresolved Aboriginal Land Rights claim.

Forget "rigorous" – even the most cursory Review of this BHS site search during July 2020 should have recognised the 'preferred' selection as heading for multi-site disaster. Even the issue of lead contamination near kids should have been a wake-up call – there's a location warning about this in SINSW's own early docs of 2019. These of course are not in the Leeson List.

While the Review ends with a 21-dotpoint checklist as Attachment B, it's clear the Reviewer was unaware that detailed **DoE Guidelines** existed – they certainly aren't in the Bellinato-provided booklist, nor referenced in the findings. These include core site-search considerations like a single site, legalities, and being away from railway lines. Failing to take such basic DoE requirements into account re BHS is not just disempowering to the Reviewer, it distorts and undermines her entire output.

This omission also raises further questions of serious concern re the integrity of SINSW input to this as an "independent" Review.

2. Evaluation criteria based on School Infrastructure's standard criteria were established and applied in a consistent manner across all sites considered including the preliminary search of government sites, the three submissions to the Expression of Interest (EOI) and to subsequently identified alternative potential sites

This is a sample of Bellinato backgrounding. First failure -- as just indicated, there's NO reference to the DoE Guidelines for a Regional High School in the Leeson List.

So how could the Reviewer assess whether those criteria were applied "*in a consistent manner across all sites*". We also know the 'preferred' location ignored some key 'basics' – for starters, it was a multi-lot split site separated by a busy public road. It was/is seriously undersize, directly next to a lead-contaminated rail line, with mega legal issues in Crown land complications, inc an Aboriginal Land Rights claim.

Yes, in 2019, there was a search of govt sites – but PDNSW didn't call it 'preliminary'. In fact, they examined eleven locations in the Bungendore area, SEVEN in detail, including both parts of the 'preferred' location. All seven were found to be NOT SUITABLE. It says so in the chart on p.8 in the PDNSW Site Search Report dated March 2020 –another key document missing from the Leeson List.

As for applying "evaluation criteria" in a "consistent manner" to all EOI sites this is simply not true. It is also wrong to suggest there were just "three submissions" to the EOI. There were more, and the above PDNSW Report of March 2020 refers to at least five 'possibles', with three shortlisted. It positively recommends ONE as superior. More on this later.

3. The EOI process appears to have been well managed by Advisory and Transactions, to the EOI.

Easy to agree with this – emails as provided by GIPA for the period 1 Jan – 30 June 2020 show that the PROPERTY professionals did a good job. Where things went off-track is when SINSW started doing side-deals directly with QPRC – as indicated by the Leeson List email of 3 April 2020. The secret links with QPRC were not known to Crs, and NOT identified as such in GIPA material, but now revealed in this Review. Why withheld ?

Not sure where the wording about Advisory and Transactions comes from. It possibly refers to what should read as "Development & Transactions". In 2019 the EOI process was being handled by Property NSW, which had a New Year name-change to become "D & T" – and that's the name on the 4pp BHS Site Search Analysis dated January 2020. It's the one which does a photo survey of three sites as offered in the EOI.

As mentioned earlier, this Analysis also includes reference to EOI Evaluation Spreadsheets of possible sites as offered by private owners.in the BHS site-search. Surely this photo-analysis with detailed spreadsheets would be of significant 'process' to note in a site-search Review. But there is nothing for January 2020 in the Leeson List - another notable omission. Did SINSW think no-one would notice ?

4. Consideration by School Infrastructure of alternative sites concurrently with the Due Diligence process for the shortlisted EOI site (Tarago Road) was appropriate given the weaknesses and emerging issues with that site

This is re-inventing history. The way it was done in secret is certainly not usual – and the Reviewer should have known this, before assessing such non-standard procedure as "appropriate". As for the reason given to justify this – it's nonsense.

There were NO "weaknesses" in regard to the Tarago Rd site.

In fact, by mid-May, it had already ticked a lot of criteria, and there are emails of mid-May and early June which show that PDNSW was moving into the final stage of “due diligence” investigation as a precursor to purchase - this had just been approved to proceed with work started on “commitment to secure” Refer also email from Melanie May on 5 June 2020.

Going into “due diligence” is a landmark towards approval. It is NOT the next step for a property with “*emerging issues*”. Note also –Tarago Rd was not just another “*shortlisted EOI site*” – it was THE recommended location. Refer docs and email communication in March-April-May with site-owner Tara Taubenschlag.

Certain persons in SINSW may have “*concurrently*” been giving “*consideration*” to “alternative sites” – but, no reasons for this are publicly acknowledged. It may have been flim-flam as fed to the Reviewer in backgrounding by Carlo Bellinato.

5. Community and key stakeholder engagement could have been managed better, including greater transparency, once discussions commenced with Council on the Majara Gibraltar Sites Precinct (MGSP) investigation and due diligence.

This is the most fatuous statement anywhere in the Review. Forget about ‘*greater transparency*’ or “*could have been managed better*”. In the period 2018 to Aug 2020 there was NO “community” engagement whatsoever. NONE – zilch, nada, nil. Indeed, the Barilaro announcement almost gloated about it AS a surprise. Refer media quotes.

Apart from discussions with EOI respondents (which were confidential anyway) it’s now known that there was NO “stakeholder” engagement either, not until mid-July, meaning AFTER the sudden switch of mid-June 2020 - and very little even then. How to define ‘stakeholders’ is another question left unanswered.

It seems that meetings were held with a few top execs from a few sporting bodies known to use Mick Sherd Oval. These were top secret and strictly info-only, not “consultation”. All involved were required to sign a non-disclosure agreement so strict they could not even inform other committee execs, much less their Club members, or the ‘community’ at large.

So much for “greater” transparency. There was NONE whatsoever. As for whatever talks were had with Council – until the revelation, here and in the Leeson List, the very existence of any such SINSW—QPRC collusion has been strenuously denied.

The first that QPRC Crs knew of any DoE of public land in Bungendore was on 3 July 2020 when they read their Agenda for the next week’s Planning Committee meeting on Wed 8/7.. Indeed, the scheme was kept so secret, the ONLY information allowed for QPRC Closed Council Agenda Item 11.1 was the heading “Bungendore Facilities.”

Not a word to even hint that it might be about a SCHOOL SITE, or closing a road, or selling the Palerang Chambers, or land-grabbing from Bungendore Park and Bungendore Common, or renegeing on Abbeyfield, or losing the Community Centre, the Bungendore Swimming Pool, and street parking – and so much more. How could the people of Bungendore protest – they didn’t even know !

And the Minutes reporting that meeting are almost as empty, with bare mention re ‘new high school as proposed by DoE.’ There was NO detail re QPRC involvement whatsoever.

The lack of transparency has been monumental. If this Review is about site-selection process, then the process that was perpetrated by SINSW on 8 July 2020 in CLOSED Council is a landmark of lies and deception.

We now know that even the site-maps they used back then were wrong – and that the site “searching” was so slack it didn’t have a clue about legal aspects of public areas being taken over. The first question asked about Crown land controls appeared in SINSW admin emails on 20 August 2020 - six weeks after the secret session on 8 July, and a fortnight after Barilaro’s “official” announcement. It’s not in the Leeson List either.

This means that even within the outline given to QPRC Crs on 26 August, the site selection was incomplete, larded with non-sequiturs, and riddled with unknowns. That document is five days after 20 Aug 2020, but it is in the Leeson List. Labelled “Educational Precinct”.

Did the Reviewer read this SINSW presentation ? Did she realise the site-search issues it reveals ? Was she fully aware of the WHO-WHAT-WHEN and HOW things occurred to that date ? If not, then she’s as much a victim as anyone who dismisses the deficiencies of this Review as ‘minor’. OR, perhaps the SINSW connivance was so confounding, she simply stopped asking questions, and just gave up.

6. The selected site is significantly superior to all the sites evaluated.

These findings are elaborated on below.

This is a statement of personal opinion. There are NO known 2020 “*findings*” of comparative superiority for the ‘preferred’ site – and certainly none in the Leeson List. The Review itself emphasises that this is just a desktop “Site Selection Process Review” As such, there is no call for any finding re the status of site results. Statements by the Reviewer suggest a lack of any personal or local experience whereby site outcome evaluations might be “*elaborated on*” as to which may be more, or less, “*superior*”.

Use of the word “superior” is ironic, moreso given this is the precise word used by PDNSW in their Site-search Summary nominating Tarago Rd as the recommended site.

Findings 1 and 2:

School Infrastructure site selection processes and PDNSW EOI Processes

School Infrastructure has adopted a consistent and repeatable process for school site acquisitions as evidenced by the site selection process for the Murrumbateman Public School which was provided as an example.

This process included:

- Engagement of PDNSW as School Infrastructure’s property agent.
- An initial search of the Government property register to identify potential government or Council owned sites. This failed to identify any sites that adequately met SI’s criterion.
- A subsequent public EOI process managed by PDNSW using its standard EOI framework and approach. This is consistent with other EOI processes I have been involved in across NSW Government.

- School Infrastructure has an established set of essential and desirable criteria to identify and evaluate potential sites for new schools. In the Bungendore case, 22 criteria were identified and applied in the EOI process and against the alternative sites as they emerged.

A copy of the criteria used for the Bungendore site selection is provided at **Attachment B**.

This reference to Murrumbateman fails in the very first para. Yes, SINSW may have adopted a relatively “*consistent and repeatable*” process that shows up in Murrumbateman – but for BHS, the switch from EOI ‘system’, to SINSW ‘preferred’, demonstrates the exact opposite.

Trying to equate the standardised site search re this Yass area primary school with what happened at Bungendore is an insult to both logic and community intelligence – and a fraud on the Reviewer.

The harder this Review highlights what worked at Murrumbateman, the more shocking the contrast with what went wrong for BHS.

And yes, both started with the stock-standard PDNSW system - first to look and check what govt land might be available. If nothing suitable there, move on to EOI re private sites. And in between times, work with local Council, and listen to the community. That’s pretty well how it went at Murrumbateman, except that, as the Leeson List shows, the EOI wasn’t issued until mid-July 2020. This came AFTER some months of open discussion and community input - real notice given, real meetings held. This included discussion of Crown land AS Crown land, ie community open space, not up-for-grabs Council give-aways.

So the EOI was generally pre-agreed, and ended in late-Oct 2020 with selection of a private site, from a private seller on a single lot big enough to have its own parking and all facilities contained within school grounds. [That process extended into Oct 2020, so well beyond the cut-off date set for this Review, which raises other questions as to why this village can be cited – but other site options for BHS miss out.]

So, BHS began with the usual procedures as in “identify and evaluate sites” – first re govt land, then into EOI, then a site was ‘recommended’ – ie selected for next-stage orderly investigation towards final due-diligence, approval and purchase.

Sounds the same – but in Bungendore, at the same time this professional process was proceeding via PDNSW, the Reviewer suggests that this work was being sabotaged by secret double-dealings between SINSW and certain sections of QPRC – because most Crs, and ALL the community were in the dark about what was underway. Not a clue. Those two “surprise” emails of 15 and 26 June 2020 prove it !

In contrast, the Murrumbateman EOI process was open, with active involvement throughout, and this from both Yass council as a WHOLE, and with community engagement that started as PART of the site decision-making.

As a result, and although there was some disagreement re the exact parameters (and size!) of the selected site, there was such wide and ongoing agreement that the SSDA attracted just 8 submissions – most in favour.

Compare that to the massive site-resistance that still actively objects to BHS location.

Important note here - the next-step into final due diligence re Tarago Rd had been APPROVED and as at 5 June 2020 was about to begin. If it had been allowed to continue through to purchase, then it would be fair to quote Murrumbateman as site-search equivalent.

Finding 3:

EOI Process Management by PDNSW

A review of the EOI Invitation document and the Evaluation Panel's Recommendation report indicate PDNSW undertook a standard process for the EOI for the Bungendore site. The Murrumbateman documentation referred to above demonstrates consistency of approach.

The weightings given to the evaluation criteria were, in my view, appropriate.

The EOI Invitation document was clear that shortlisting was the first phase, and that subsequent phases of due diligence and acquisition would follow for any shortlisted site.

Murrumbateman site was identified by the EOI, and the site acquired by commercial transaction with the developer of nearby Fairley Estate. The SINSW site for BHS was selected DESPITE the "*standard process*" of ongoing EOI procedures. PDNSW definitely maintained a "*consistency of approach*". But SINSW did not.

Instead, SINSW suddenly intervened, cancelling the approval with the surprise site-switch of 15 and 26 June 2020. That in itself should have set off alarms bells in this Review.

On that 8 July 2020, CEO Tegart knew what was underway, and the Mayor may have - but Crs and community didn't have a clue that an enigmatic two-word Agenda Item 11.1 was about wrecking a street grid and decimating Crown Land, which also happened to be the main public space, and the ONLY Park in their entire township - in fact a true "Town Square". Did the Reviewer even look at an overall Bungendore street plan or google Satellite view? Did she check the QPRC flood plain maps – or just "take Carlo's word for it"?

All this should have been instantly apparent even in "desk-research"- just by looking at the site plans being introduced, changed and changed again, in July-August 2020.

This Review seems utterly unaware of the above -- cold, hard PHYSICAL FACTS and thus integral to the BHS site 'selection'.

Note also, a tick-box list of so-called criteria proves nothing if [a] the box-ticker has a vested interest in whatever the result is 'supposed' to be [b] the box-ticker is the only assessor used. See earlier comments – the EOI process as done by PDNSW through to mid-June 2020 WAS done in line with standard site-selection procedure. From July 2020 - wishthink wins.

Noting the significant volume of material relating to the shortlisting and due diligence process, it might also be useful that future EOI invitations be explicit that PDNSW/School Infrastructure reserve the right to consider alternative sites in parallel with the EOI and Due Diligence processes.

This is a fatuous quibble. If the Reviewer had read the actual EOI documentation as issued in Nov 2019, and that given to the "short-listers", she would have seen very similar warnings re alternative sites. The only wording not covered is about being "in parallel with". The comment is to do with PDNSW as professionals – not "site-search-process" as such.

In accordance with the EOI processes, the evaluation of submissions preceded any due diligence or detailed site investigations. This was a sound approach given the cost and time involved in due diligence exercises and the unknown number of sites that might be nominated.

In 2019-20, normal EOI procedure by Property NSW (now known as PDNSW) would be done in four stages –

- 1) invite expressions of interest, consider replies,
- 2) prepare a shortlist for further specific evaluation against basic criteria and DoE Guidelines
- 3) recommend the “most suitable” and then do specific site investigations
- 4) if all ok, then do detailed due diligence, legal checks etc
- 5) final stage admin, purchase negotiations, contract preparation etc.

I was not provided with any advice or documentation to review in respect of governance processes although it was noted in correspondence from PDNSW to School Infrastructure that a Project Control Group was intended to be established to oversee the process. (Refer letter of 18th March 2020). Similarly, I was not provided copies of correspondence between PDNSW and the EOI proponents formally advising them of the outcomes. Accordingly, I can make no comment on the execution of those processes.

If a BHS team (a pre-planning or project reference group) had been set up (as worked at Murrumbateman) it might have ensured early and/or ongoing communication with the Bungendore community, and thus identified site issues to SINSW long before they could undermine the selection process.

For a Reviewer to equate these two ‘site selection’ scenarios suggests either a dire breakdown in analysing parallels, or failure to do any homework other than skim-read the docs drip-fed by SINSW.

The last sentence here also raises another question. If the Reviewer herself reports that she was aware of, but “*was not provided*”, significant related information, and this to the point of declaring “*I can make no comment on the execution of those processes*” -then what credence can be given to the Review overall ?

Finding 4:

Concurrent consideration of alternative sites

The EOI evaluation report rated Tarago Road the better site relative to the others but was itself only rated “good” or “adequate” across the non-price scoring indicators.

It is noted that “good” is described as Complies with the specified requirements, some minor issues and weaknesses would be acceptable as offered and “adequate” is described as minimally compliant with the specified requirements, some risks and weaknesses possible to correct and make acceptable.

No criteria was rated as Complies with the specified requirements and has desirable strengths and minimal risks or weaknesses.

This is wildly WRONG, and demonstrably so, given the CONGRATULATORY content of documents mid-late Feb 2020 advising owners of the Tarago Rd site re its success in the EOI stage of the site-search process. And in both the internal (ie professional evaluation) report ie Site-search Summary of Feb, and the external (ie to SINSW) Site-search Summary of March, PDNSW describes Tarago Rd as “superior” not merely “adequate” or “good”. It should also be noted that as it stands, the last sentence in this section defies comprehension.

Given the modest rating of the Tarago Road site, the decision by School Infrastructure to concurrently undertake the due diligence process and consider alternative sites that might be more suitable was, in my view, highly appropriate.

Since there never was any “*modest rating of the Tarago Rd site*” it is impossible to ascertain what timeframe is being described as “*concurrently*”.

There is no identifiable source information related to this in the Leeson List. Indeed, the first documentation quoting DET (SINSW) as involved does not appear until “June 2020” – months after the PDNSW recommendation had been actioned with detailed investigations re site characteristics, biodiversity, heritage etc. All reported compliance with critical criteria, NOT rejection.

This dual approach commenced in March 2020 when the due diligence processes started on Tarago Road and coincided with Council proposing two alternative sites in preference to the Tarago Road site - which its recently adopted Bungendore Structure Plan (February 2020) identified for long term residential use.

See above re lack of reference material re any “*dual approach*” from March 2020. Those two “*alternative sites*” remain un-named, and elusive to locate in the 2048 Bungendore Structure Plan. This no surprise, given that when approved by QPRC on 26 Feb 2020, all reference to “education” or “high school” in p.52 of the Draft (Oct 2019) had been stripped from the final version. Perhaps Council is proposing two of its own sites. In this case, they would appear in the PDNSW Chart of govt-owned sites which are decisively eliminated as ‘NOT SUITABLE’ in the March Site-search Summary Report.

The available documentation surrounding the formal finalisation of the Tarago Road due diligence process is limited but is referenced in an undated School Infrastructure Ministerial briefing note (DGS20/1481- noted by the Ministers office on the 26th June 2020) as having been concluded in early June.

This is another example of poor briefing by Carlo Bellinato. Of course there’s limited documentation of the “due diligence process” for Tarago Rd because it hadn’t happened yet ! Why not ? Because the standard PDNSW process is STAGE 1 – EOI and shortlist. Then, STAGE 2 –investigative, ie the various studies handled in in March-April-May. Only after passing these does a site move into STAGE 3, due diligence. This work was just about TO START for 175 Tarago Rd (refer PDNSW email of 5 June) when SINSW ordered an urgent pause on 15 June, followed by the email of 26 June declaring site-switch to the Mick Sherd Oval. Both seem to be in the Leeson List - but nothing re the significance of their timing.

There were numerous substantive issues that cumulatively support the conclusion that the site was unsuitable for the new school. These were:

- Flooding – flood mapping in the Bungendore Structure Plan 2048 indicates a substantial portion of the site to be flood prone
- Adjoining land use – the site adjoins the waste transfer facility. This has a 500m buffer zone for odour that would sterilise development on a substantial portion of the site
- Water availability – reliance on adequate groundwater and extra bore holes
- Utilities – the site would need extensive sewer and electrical extension at significant investment
- Access – the site is isolated from existing pedestrian and cycle networks. Up to 800m of new road would be required to be constructed to access the site
- Location – the site is on the northwest fringe of Bungendore and distanced from central Bungendore and the primary school
- Environmental – potential threatened species and potential requirements for Commonwealth approval
- Zoning and timing – the site requires rezoning to permit education purposes.

Flooding – This is a lie. Flood mapping in the Bungendore Structure Plan 2048 indicates a substantial portion, at least 85%, of this 80ha site, to be flood-free. The Taubenschlag EOI offer was for SINSW to take any size/shape/area of the land for a new BHS.

Adjoining land use – This is a lie. The site is across Tarago Rd and quite a distance along, away from the waste transfer facility. As for odour – this is a RECYCLE CENTRE, not landfill, and there is no record of any odour problem, ever. Given this, a 500m buffer zone is now considered over-kill, with 250m recognised as ample – which totally clears this site.

Water availability – Reliance on adequate groundwater and extra bore holes is a water problem which applies to ALL BUNGENDORE – including the ‘preferred’ SINSW site. To use it as a reason to reject Tarago Rd is mischievously misleading.

Utilities – This is a lie - another deliberate misdirection by SINSW. The site is not only right next door to the long-established Ashby residential estate, but the original Ashby heritage homestead is within the overall Tarago Rd site. They all have town water, power and sewer facilities available for extension to a new school there.

AND it’s now known why the new ‘temporary’ BHS had to open with diesel-powered demountables. Because the existing electrical supply couldn’t cope. It’s so old, obsolete, and overloaded, that for a new BHS as proposed, the whole system will need a total rebuild. Greenfield site connection will be millions of dollars easier - and faster.

Access – More misdirection. The site already has direct access off Tarago Rd, and an established gravel -style roadway along the near-side fenceline down to the heritage homestead. Of course a new school would require its own entry and access routes – but this applies to ANY SITE. Note also, Bungendore has NO “existing pedestrian and cycle networks” so this a fake comparator. On the other hand, the major traffic disruption to street parking and re-organising roundabouts as required by a desperately under-size ‘preferred’ site – these have been conveniently ignored.

Location – While it’s true that the site is to the northwest of Bungendore, the Bungendore Structure Plan has this area marked for major residential development – with much underway already. And although not immediately next to central Bungendore, the location is closer to its local shopping area than the new Jerra High School will be.

As for proximity to the primary school – it is well within the allowable 2.5kms. Far from being a negative, this distance is a plus, because locating secondary cohorts too close to primary is now recognised as a failed K-12 policy, to be avoided everywhere possible.

Environmental – 175 Tarago Rd was studied in detail in a major Biodiversity Study done for QPRC as a key element in the Bungendore Structure Plan. As a result, it is beyond doubt that this site has zero issues re flora, fauna and any other aspects re threatened species and also meets potential requirements for Commonwealth approval.

Zoning and timing – Yes, this site requires rezoning to permit education purposes. But in a far more convoluted way, so did the ‘preferred’ site in mid-2020. And still does, even now.

Uncertainty of statutory planning timeframes

It is unclear what level of involvement PDNSW had in the alternative site analysis processes, but it appears that it was managed by School Infrastructure at arm’s length from PDNSW who had recommended (via email of 17 March 2020) that School Infrastructure progress preliminary desktop due diligence on the Council nominated sites.

It wasn’t ‘unclear’ – PDNSW was NOT involved. It was told, in nothing less than sabotage of the EOI site-search process, ie done in secret, and definitely beyond arm’s length.

PDNSW did hear that “*Education met with Council to discuss potential sites*” – DPIE email Fri 28 Feb 2020. There seems to have been no follow-up, notwithstanding the Leeson List reference to a PDNSW email to SINSW on 17 March 2020 advising --

- 1) Tarago Road due diligence (sic) commenced and**
- 2) Council advice re alternate potential sites**

No alternate sites named. This double dealing shows yet again that the BHS site-search/selection was not standard – nothing like Murrumbateman.

The ensuing analysis of the alternative sites appears to have been an iterative process between School Infrastructure and Council – revisiting the Mick Sherd Oval, the primary school and ultimately settling upon the MGSP site which incorporates Council owned properties on Majara Street and part of Majara Street itself.

This so-called “iterative process” between SINSW and QPRC seems to have been triggered in early June 2020 by the realisation that the Tarago Rd site was about to move into Stage 3 for Due Diligence. In the presentation document provided to Councillors at the QPRC Meeting of 26 Aug 2020, there is little evidence of any realistic site comparisons or analysis.

Item 9.1 is in the Leeson List, and on any professional reading, it suggests a precinct-based K-12 decision (rife with errors) to take-over certain Council and Crown lands.

Finding 5:

Need for improved community engagement and transparency

There is little documentation available covering the period from mid-March 2020, when there is reference in an email to Council's lack of support for the Tarago Road support and identification of alternate sites, until the announcement of the selected site in August 2020.

Even with GIPA "refusals" there is actually quite a lot of documentation to cover this period – it's just that so much has been withheld, presumably by Carlo Bellinato – though to be fair, and even noteworthy, his name does not seem to appear in email dates before June 2020.

Note also, Council never expressed "*lack of support*" for OR against the Tarago Rd site. Crs never had the chance to. And although all Council comments occur AFTER the Review's cut-off date, it is worth noting that at best, QPRC gave "in principle support" for a new BHS, not location as such. There was never any vote of enthusiastic agreement with the SINSW site selection. Crs weren't allowed any other option.

The section subhead indicating "*Need for community engagement and transparency*" is surreal. At no time before mid-Aug was the community given a chance to comment, so it's a mystery where any email could come from re "*lack of support for the Tarago Road support and identification of alternate sites*" whatever this muddled statement may mean.

The strong community reaction to the announcement and media coverage strongly suggests there had been little or no transparency and engagement with the broader community as due diligence works and discussions/negotiations with Council took place – although it is noted that some consultation had occurred with sporting groups that utilise Sherd Oval.

This conclusion is supported by the lack of documentation regarding this period. Whilst there might have been commercial-in-confidence matters or other sensitivity, these do not necessarily preclude some form of community engagement – by School Infrastructure or Council.

According to first hand comments from people directly involved, the ENTIRE community engagement that occurred before mid-July consisted of secret meetings with one or two senior execs on the committee for those Mick Sherd user sporting clubs. One other is known - re the War Memorial.group.

Those meetings were treated as top secret – held in a closed room, without "notice" or agenda, and the execs were required to sign a non-disclosure agreement so 'tight' they were refused any right to report the topic (much less discuss any details or community ramifications) to their members. SINSW gave them NO documentation, banned them from taking notes.

The 'preferred' site was presented as a "done deal" with minimal chance to discuss detail or raise issues. They were forbidden to even mention to family, or to get any feedback from their Club, or to consult with the community at large.

For the Review to call such clandestine charade "consultation" is a sham. Even worse was the way SINSW then began claiming how all those exec's 'agreed'. The War Memorial folk felt bullied and coerced into accepting a 'done deal'.

Council's in-camera consideration of the matter in July 2020 is also indicative that transparency could have been stronger.

This appears to be the only weakness in School Infrastructure's approach to site selection. It is recommended that School Infrastructure work with relevant councils in the future to improve community engagement in the site selection process.

As outlined earlier, that closed session of QPRC on 8 July 2020 was a total abuse of his Council power by then-CEO Peter Tegart. But even the DATE should have rung alarm bells for the Reviewer. There had just been the email of 26 June 2020 with its message re change of mind and switch to Mick Sherd Oval as 'preferred' site for BHS. Less than a fortnight later, the SINSW plan is in closed COUNCIL at Queanbeyan.

In fact, whatever was presented had to be ready in a week - ie for the Agenda issued 5pm Fri prior. And there it is in the Carlo Bellinato list on that date—

3 July 2020

New High School in Bungendore –

Proposal to Queanbeyan-Palerang Regional Council by DET (SINSW)

Majara and Gibraltar Streets Precinct is a superior location

The MGSP was assessed against the School Infrastructure criterion and proved to meet 14 of the 15 essential criteria and 3 of the 6 desirable criteria.

On those metrics alone the MGSP is demonstrably superior to the other sites identified. The criteria that have not been met are agreed to be **minor: legal issues**, single allotment, regular shape and cleared site.

Whoever advised the Reviewer that the 'preferred' site scored 15 of 16 essentials and 3 of 6 desirables just plain misrepresented a tickbox list as the '*metrics*' of reality, whilst ignoring specific requirements in official DoE GUIDELINES. These are NOT on the Leeson List, so not provided to the Reviewer, who probably didn't realise they even existed.

It is unconscionable that the Reviewer has been led to consider legal issues as "*minor*". As at the date of this Review, those little legalities had meant almost a year's delay, had been subject to a full day's Hearing in July at the Land & Environment Court, and as at Nov-Dec 2023, was still awaiting judgement – which, when it was handed down on 13 Dec upheld the community group challenge against the SSDA. A very big "*minor*" matter.

The School Infrastructure analysis sets out additional and significant advantages of the preferred site including:

- Superior outcomes with co-location of the primary school and high school, fostering K-12 initiatives and sharing of facilities for teaching and learning
- Centrally located with potential for community use of the new hall and other facilities
- Superior connectivity for the student population of Bungendore
- Well suited to serve the current and future residential subdivisions of the Bungendore Structure Plan

The SINSW presentation to QPRC re their takeover of a ‘preferred’ site for BHS is assertion, not even close to the kind of “*analysis*” such a project requires – and which was given to plans for nearby Jerrabomberra, and indeed to Murrumbateman !

A typical failure is demonstrated in the third dotpoint – “*the student population of Bungendore*”. Even with residential growth as predicted in the 2048 Structure Plan, the only rationale that justifies a new BHS is to build it as a REGIONAL High School, with student catchment covering FAR more than just Bungendore. Central or local connectivity is irrelevant for the 40% or more of kids coming from kms out of town – refer Draft Structure Plan, p.52.

Although the focus of this review has been on process, from my review of the documentation and of the potential sites relative to the Bungendore Structure Plan, statutory instruments, physical site constraints and location I concur the MGSP site is, on merit, superior to the other sites considered.

This end para is a triumph of self-delusion over reality. The Reviewer admits she has only been given partial documentation, and knows that, in and of itself, an arbitrary end-date of 20 Aug 2020 must exclude certain other ‘site-search’ information that IS related– and may even be CONCLUSIVE. As written this Review is blissfully unaware of basic legal factors (like Crown Land - the words don’t appear even once in this whole Review!), and lacks any real understanding re locations and locales – let alone physical site condition or constraints.

For instance, “flood-prone” is cited as reason to reject Tarago Rd– when official QPRC maps (inc in those EOI summaries, and in the much-vaunted Bungendore Structure Plan, which IS on the Leeson List) show that for 90% of that very large site, there is no flood risk whatsoever. Moreover, SINSW were offered their choice of ANY PART of the site.

In short, this Review is so obvious as the result of ‘desk-only’ research that it would have been wise to leave it at that. Instead we get this conclusion beyond search process, to MERIT re site as selected.

But there’s a key here, and it gives the game away. Those two words “*I concur*”.

Concurrence is not the same as a personal ‘finding’. It’s when you agree with someone else – which is exactly why this document was commissioned, and what someone manipulated the input for, hoping to achieve. When a self-proclaimed Independent Reviewer so conveniently concurs in the face of one-sided facts, it skews this whole Review.

Dianne Leeson

Independent Reviewer

1 December 2023

ends.

LEESON LIST ---TOTAL 24 DOCS.

Appendix A – Principal Documentation Reviewed – Date - Details - Author

October 2019

Queanbeyan-Palerang Regional Council Sports Facilities Strategic Plan
by QPRC

November 2019

Expression of Interest advertisement
by PDNSW

8 November 2019

Expression of Interest document
by PDNSW

7 February 2020

EOI Recommendation Report
by PDNSW

February 2020

Bungendore Structure Plan 2048
by QPRC

17 February 2020

DGS20/333 advising recommendation of preferred site arising from EOI process by
SINSW

17 March 2020

PDNSW email to SINSW advising 1) Tarago Road due diligence commenced and
2) Council advice re alternate potential sites
by PDNSW

3 April 2020

Email from PDNSW to Tara Taubenschlag – re Council nominated alternative sites
by M May PDNSW

April 2020

Constraints Assessment 175 & 217 Tarago Road, Bungendore
by ESG (Dept of Planning)

June 2020

Proposed Bungendore High School – Site Consideration: Bungendore School Site
Options by DET (SINSW)

16 June 2020

SINSW email to PDNSW advising confirmation of preferred school site – Mick Sherd
Sports Oval by SINSW

26 June 2020

Email from DET/SINSW to PDNSW – re shift in project direction and preferred site
By ??

Undated: June 2020 (assumed)

DGS20/1481 Min Briefing Note: SINSW undertaking due diligence on the Oval site (Sherd Oval) and Tab A (masterplanning diagrams) by SINSW

Undated: late June / early July 2020 (assumed)

DGS20/1631 (signed version) re Bungendore High School – 8 July 2020 Council Meeting by SINSW

3 July 2020

New High School in Bungendore – Proposal to Queanbeyan-Palerang Regional Council by DET (SINSW)

July 2020

Towards 2040 Queanbeyan-Palerang Local Strategic Planning Statement by QPRC

July 2020

Murrumbateman Expression of Interest - by PDNSW

10 July 2020

QPRC correspondence to C Bellinato (DET/SINSW) by QPRC

Undated/unsigned: Assumed July 2020

DGS20/2119 – references consultation with local sporting groups/users of Mick Sherd Oval -- by SINSW

15 August 2020

Media clipping References acknowledgement of lack of consultation with broader community. This by Riotact

26 August 2020

QPRC Ordinary Council Meeting Item 9.1 by Riotact

XXXXXXXX??

Bungendore Educational Precinct – Acquisition Proposal by QPRC

2 November 2020

QPRC correspondence to G Waterhouse (DET/SINSW) – noting outcomes of community consultation and advising Council's resolution to support the proposal - by QPRC

17 November 2020

DGS 20/3052 briefing note on updated proposal to QPRC, by ??

Ends

DoE --- HS Criteria - Explanation

Standard site sizes, inclusive of built form and open space are as follows:

The standard site sizes are based on development of schools in line with the Schedule of Accommodation within the Educational Facilities Standards and Guidelines.

Regional/rural areas:

- 2ha for a Primary School

(capacity up to 1,000 students)

- 4ha for a Secondary School

(capacity up to 2,000 students)

Typically, this includes built form up to 2 storeys in height in context with the low scale of surrounding areas.

Open space is typically provided at grade only.

Suburban/low-medium density areas:

- 1.5ha for a Primary School

(capacity up to 1,000 students)

- 2.5ha for a Secondary School

(capacity up to 2,000 students)

Typically, this includes built form up to 4 storeys in height, with open space provided at grade only.

Whilst this method is still valid for most schools, particularly those in low density suburban areas, innovative solutions to school design in dense urban areas may be appropriate.

COMMENT --

Thanks Maureen. I'm certain that the open space 10sqm threshold specifically excludes areas that are not part of the formal school grounds, and I'm pretty sure the EFSG excludes that as well.

This means Carlo has misrepresented the site area by including the Oval. If he's gone to the trouble of quoting those numbers, he would have seen that the Oval should not be counted.

He's a deceitful snake!

Section 8.4 ON P.52

Issues and Opportunities

☐ The State Government has made a commitment that a high school will be located in Bungendore. This commitment means that a high school will be built regardless of the growth scenario. Siting and design criteria for the proposed High School should take into account principles such as ensuring the site:

- is not located on land that is flood affected
- is within easy access to the town centre
- is within easy access to transport
- is not adjacent to a railway line
- is sufficient in size to meet the required off street parking
- is suitable from a traffic management perspective
- the development enable the use of school facilities (including recreation facilities) to be shared with the community