

Mrs Carolyn M E Cole  
8 Ireland Place  
**BUNGENDORE**  
NSW 2621

Director - Social and Infrastructure Assessments  
Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Sir/Madam

## **NEW HIGH SCHOOL IN BUNGENDORE**

**Application Number** SSD-14394209

I refer to the above state-significant development application. I have not, and no associate of mine, has made any political donation to any person in the 2 years preceding this submission.

I object to the proposal.

The Department of Education (DoE) has failed to model the impact that population growth will have on the Bungendore township, its infrastructure and its community.

I call upon the Department of Education to respond to the following points:

### **1. There has been no modelling of Bungendore's population growth in planning for schools in the Bungendore area**

#### **a. The current primary school.**

How does the DoE respond to the requirement for the primary school to expand to meet the town's rapidly growing population? The school's intake is projected to increase by at least another 500 students in the short to mid term. The school is located on a small pocket of land adjacent to the DoE proposed high school site and already relies on demountable classrooms. Play areas will be drastically reduced when more demountables are erected in the primary school recreation area to house a 'temporary high school'.

#### **b. Traffic and parking.**

Neither the primary school, nor the proposed high school on the DoE proposed site are located in the population centre of Bungendore. Consequently most students are trafficked in by car or bus. These numbers will increase exponentially once the new subdivisions are completed and high school students are travelling in from geographically distant catchment areas.

Traffic for the primary school is already chaotic at drop off and pick up times. Although under stress during these times, traffic flow is accommodated by the current road grid system. Under the DoE proposal a critical part of this road system will be permanently closed to accommodate the new high

school buildings. The small historic precinct of the town was cleverly designed to deal with light to medium residential traffic. It will **never** have the capacity to deal with the kind of traffic volume generated by two overcrowded schools.

**2. Social Impact. Please refer to the attached Review of Social Impact Issues Relating to the Proposed Bungendore High School by Dr Alison Ziller PhD.**

The DoE proposal represents loss of the town's civic precinct. There is no proposal to replace, relocate or recreate the precinct, specifically the essential facilities and amenities relied on by the community. The Amendment Report by mecone states that proposed community buildings will **not** be included on the site and has shifted responsibility for the replacement of these vital facilities to Queanbeyan Palarang Regional Council (QPRC). However, the Council is in serious financial difficulties and will not be in any position to prioritise the replacement of these facilities.

**3. Disregard of Community Opposition**

The DoE proposal has divided a previously close knit community. There is no opposition to a high school, there is very, very strong opposition to the proposed site which will rob the town of its historic precinct, choke its well planned centre with traffic and remove critical social facilities and amenities. The DoE has held information sessions where its staff have demonstrated a complete lack of understanding or knowledge of the town and have misled the community with half truths and lies. An example of this occurred at the recent information was witnessed by a number of residents of the Turallo Terrace area, which the DoE will transform into a high school car park. The DoE representative assured us that most of the residents of Turallo Terrace had been consulted and were in broad agreement with the plan. These residents were in fact surprised witnesses to this statement – no such consultation has occurred.

Regards

Carolyn M E Cole

## 1. Location

The search-for-a-site process contained in the EIS is not properly described. Instead over 1,000 hectares of land claimed to have been assessed have been deemed unsuitable for a high school on the grounds of '*availability of services such as sewage, electricity and roads; environmental constraints such as bushfire, ecological impacts and flooding; and potential community benefits*'. This is a dismissive mantra repeated throughout the report. Why hasn't each considered site been assessed against individual criteria?

The EIS claims that various acquisition hurdles are avoided by the choice of a site already in public ownership as Crown Land. There is no further explanation for the choice of the proposed site. However, according to the DoE's own records released under the Government Information (Public Access) Act (GI(PA) Act):

- the Applicant received three responses to the EOI process. Two sites were dismissed for reasons which were flawed, and in March 2020, the Applicant recommended that a site on Tarago Road, at "Ashby Station" be selected having met all DoE criteria.
- A further five privately owned sites were identified as potentially suitable if the selected site did not proceed; a survey of publicly-owned land undertaken at the same time concluded that Bungendore Park (the proposed site) was "**not suitable**" for various reasons, including "insufficient land area and student safety concerns".

## 2. Loss of Community Facilities

The Amendment Report by mecone says that proposed community buildings will **not** be included on the site.

The facilities to be lost are:

- a. Community centre,
- b. Community library,
- c. Council service centre,
- d. Bungendore Swimming Pool, and
- e. Direct access routes currently available to Mick Sherd Oval.

The community centre has a variety of rooms, a kitchen, and capacity for up to 60 persons. In 2021/22 it hosted:

- A medical equipment service
- 43 sessions of a child health care clinic
- A nurse consultation service
- 64 meetings of groups including the Netball Club, Bridge Club, Quilters group. Girl Guides, Rotary. Dementia Australia, Abbeyfield Bungendore & Wildcare Australia
- 178 Before and After School Care sessions.
- 46 play group sessions.

The High School will benefit less than a third of the town's population, while depriving the community of essential social infrastructure and diverse services and programs which reflect local needs, delivered at the grassroots level.

SINSW does not intend to make provision for these facilities as part of the project and QPRC is in no position to do so:

- no site has been nominated,
- the community centre does not appear in QPRC's current list of major works and projects
- the community centre is not mentioned in the QPRC Community Strategic Plan 2042,
- the community centre is not mentioned in the QPRC Delivery Program 2022-26.
- QPRC does not have a Social Plan, nor a document investigating the social needs of the growing Bungendore community.

### **No Prospect of Replacement Facilities**

There is no statement in the Submissions Report about funds to pay for a timely replacement of the community centre.

At an information session on 21 September 2022, DoE staff informed attendees that replacement of community facilities are the responsibility of QPRC. This will not occur. According to the Council's Long Term Financial Plan 2020-30 it is carrying a structural deficit. In September 2022 QPRC reported that its operation deficit has increased. It is clear where that Council is not in a position to contribute the necessary funding for the delivery of a replacement community centre or for the pool.

**High School Parking**

The Amendment Report states that an additional 58 car parking spaces will be provided along Turallo Terrace providing a total of 98

The location of the proposed high school is inappropriate on the following grounds:

- a. NSW State Government standards for new high schools require a minimum of 4 hectares. The Development Application specifies that the Bungendore Park site has a site area of 2.9 hectares.
- b. Bungendore Park is Crown land, gazetted in 1884 and dedicated for Public Recreation.
- c. Bungendore Common, which will also be used for high school buildings is heritage protected for its historic cultural and social significance and entrusted to Council in 1979 by its former trustees to be preserved as a recreational reserve;
- d. Destruction of the town's heritage precinct;
- e. Permanent removal of well used and popular public amenities including the town's swimming pool;
- f. Constrained potential growth of the future high school, noting Bungendore's significant population growth projected over the short to mid term and the very tiny building envelope offered by the proposed site;
- g. Increased traffic and road safety risks caused by the closure of an important and heavily used road without the benefit of traffic studies.

## **2. Crown Land dedicated for public recreation**

Bungendore Park is the town's only green space protected as Crown Land and dedicated for public recreation. The park is fundamental to the town's heritage and its character. The park is a natural draw for large numbers of visitors and tourists who drive through Bungendore on their way to and from the South Coast contributing significantly to local businesses.

The construction of a high school on Bungendore Park will not only remove Bungendore's much loved and well used recreation amenity, it will also remove any reason for visitors to linger and it will fracture and destroy what has always been Bungendore's well balanced and readily identifiable historic precinct.

In Crown Land 2031 published in May 2021 by NSW Department of Planning, Industry and Environment. Mr Rob Stokes, Minister for Planning & Public Spaces stated that:

'A key priority for our government, particularly for me as the state's first Public Spaces Minister, is to provide better access to quality, green, open public space for people right across NSW. Crown land ..... will play a significant role in achieving that goal'.

Bungendore Park is Crown Land and it is the town's only dedicated public recreation space. Crown Land 2031, proudly claims its top priority to be to 'Strengthen community connections with Crown land' this has been roundly ignored by the Department of Education's high school plan for the sake of political expediency at state level and financial gain at local level.

## **3. Untruths, misrepresentation, questionable motives and opaque decision making**

A future Inquiry will be informed by documents released by the NSW Dept of Planning in response to

an FOI which show that in June 2020 the State Government was finalising arrangements for a large, master-planned site for the school on Tarago Road, in an area on Tarago Road already identified for future development. The site was supported by Department of Planning and the Department of Education.

The documents show that Queanbeyan Palerang Regional Council (QPRC) then intervened in the process by proposing sites that “were not identified during the EOI process”. Within days the Department of Education emailed the Department of Planning stating that the preferred site location was now Bungendore Park and not the site on Tarago Road. No explanation was provided.

Bungendore residents were deceived and misled by Department of Education staff who stated at their most recent community hub in Bungendore ‘that the delivery of the new school is time critical and must be completed in time for enrolments in 2023. She stated that there is no contingency plan to develop the school on any alternative site should the currently proposed site prove unviable’. It is clear from the documents released by the Department of Planning that this statement was patently untrue.

#### **4. Failure in statutory duty to deliver value for money and accountability for decision making**

At the same meeting the Department of Education’s consultant project engineer stated that he was completely unaware that under the QPRC structure plan Bungendore’s population will increase from 3,300 to 12,000. He was emphatic that the proposed site for the new school would not be in any way sufficient to accommodate such significant growth.

The Auditor General’s recent report states that ‘School Infrastructure NSW has been focused on delivering existing projects, election commitments and other government announcements. This has diverted attention from identifying and delivering projects that would have better met present and future student and classroom needs.’

The Department of Education’s plan fails to recognise a community built scout hall on a portion of the common, flood prone areas and low level crossings and a railway line directly behind the proposed site. The building itself has the appearance of a quick fix inner city multi storied high school with no space to grow.

To reiterate, I object most strongly to this SSDA.

The proposed site fails to address the current trends in education which increasingly focus on outdoor education and connections to nature, open spaces and mutual interactivity with the environment.

- It fails to recognise the enormous potential which exists because it is in a rural

area with proximity to Canberra and surrounding towns. There is therefore a golden opportunity to create an educational resource which could be a magnet school with a unique identity, drawing pupils with interest in agriculture and the environment from these areas, in addition to the immediate village pupils.

- Because of its urban confines the proposed site fails to accommodate the potential linkages with the local agricultural organisations (including, but not limited to, The Mulloon Institute which is a globally recognised not-for-profit organisation connecting farming, environment, and society, through education); tourism and hospitality around the region; regional industries including the alternative energy and waste management industries; and local educational institutions such as the CSIRO, ANU, University of Canberra and the Vocational Education sectors in the region

- The current location and iteration of the High School limit regional possibilities



for rich collaboration, micro-accreditation, inspirational employment opportunities and pathways for university entrance.

The proposed location is at the expense of community harmony

- There has been no public hearing
- By encroaching on the existing limited green space in the village, the proposal ignores best practice town and environmental planning, which deliberately creates green spaces to bring people together, nourish our bodies and minds and enhance community for the improvement of the health and wellbeing of all

The construction of a high school on Bungendore Park will not only remove Bungendore's much loved and well used recreation amenity, it will also remove any reason for visitors to linger and it will fracture and destroy what has always been Bungendore's well balanced and readily identifiable historic precinct.

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3.

- By shoehorning a small footprint building into a limited space it is at odds with the village feel of Bungendore, which attracts tourists from all over the world and from around Australia to the Internationally renowned Woodworks Gallery In conclusion, we live in a world experiencing increasing extreme weather conditions; ongoing stress and repercussions from the current pandemic; and huge yet to be fully understood or quantified impacts on all aspects of society. Moreover in

particular there are the continuing traumatic impacts on the mental health and wellbeing of young people.

We therefore need to not merely protect the current green spaces we have, but to actively create more places which offer connections to nature, fresh air and community; education through hands on involvement with growing plants and food;

managing the environment and exposure to outdoor living which all contribute significantly to empower, inspire and build resilience in young people .

The proposal in question fails on all these points and all young people deserve better. They deserve an educational facility which is in step with current educational

thinking. They deserve an educational facility which is innovative and forward looking

in design, linking the lives of students and staff to the great outdoors which is integral

to the identity of our region. They deserve rich and creative opportunities which will

equip them for the challenges which the world is throwing at them.