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Director - Social and Infrastructure Assessments
Planning and Assessment
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Dear Sir or Madam

**NEW HIGH SCHOOL IN BUNGENDORE
APPLICATION NO. SSD-14394209**

I refer to the above amended 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 for the following reasons and expect the Applicant to respond appropriately to these concerns to ensure that SSDA review process is adequately informed, transparent and equitable.

- **The proposal remains substantially the same as originally proposed**

So begins the Amended SSDA (Exec Summary Page 1):

The proposal remains substantially the same as originally proposed with the amendments primarily responding to the concerns raised by agencies and community submissions. There are no changes to the number of students proposed.

But this statement is both misleading and untrue. Leaving aside the insubstantial cosmetic changes to the built form and fencing arrangements,

- The new plan takes more of the Bungendore Park's green space in order to meet the alignment of Majura Street, it now totally excludes 'the *development of high quality social infrastructure for the community*' and DofE is now configuring the School to be capable of accommodating an extra 150 students.
- The local Member who works extremely closely with the DofE now makes public statements that envision 700 or more students attending the new high school.
- The revised proposal now envisages an additional 58 parking places in Turrallo Terrace, a plan hatched without any prior consultation with local residents, again encroaching on open green space and likely to contribute further to increased traffic flows, more traffic congestion and additional safety concerns. At the latest HS information forum in September Dof E officials confidently stated that the expense of developing and installing the proposed parking would be entirely met by Schools Infrastructure NSW. But even this is not certain.

- **Flawed and inadequate SIA.**

The Applicant's response to last year's submissions conspicuously avoids addressing the rationale and reasons behind the selection of Bungendore Park as the preferred location for the new Bungendore High School.

- The recommendations of the updated 2022 SIA make a large number of recommendations at para 7.1, many of which are predicated on DofE displaying transparency, consulting widely and undertaking meaningful engagement with the Community.

- Community experience since this SSDA commenced indicates a complete absence of good faith at all: quite the opposite, just untruths, deceit and a doubling down of efforts by the DoFE and certain QPRC officials to press on with this ill-conceived and flawed plan regardless of the consequences and the permanent negative impact on the Community and its well-being.
- The updated 2021 SIA made an overall judgment that the development would:

create a low positive impact on the community. This is influenced by the provision of accessible, local education places and the development of high quality social infrastructure for the community.

- And yet the same update confirms the removal from the latest plan, of all the integrated Community infrastructure, amenities and facilities that were originally and supposedly included in the original proposal, to be funded by the DoFE.
- Supposedly, these exclusions were requested by the 2020 Council or its executive staff. But it appears that no one especially QPRC or DoFE will own up to this decision and no records exist to explain what happened and why, let alone provide an audit trail of prior discussions, rationale and rationale behind this important change of direction or document the flow of benefits that would have resulted from the decision. So where is the evidence for this amazingly expensive change of heart?
- Appendix 11 Updated SIA Dec 21 Page 1 the final assessment that the proposal would 'create a low positive impact on the community': fundamentally pivots on the following statement – which we now know to be fanciful:

Access to community infrastructure: the proposed changes to the community centre are likely to have a high positive social impact. The proposal will provide residents with access to a higher quality community facility building aligned to modern standards. There will also be no loss of service during this time, with the existing Bungendore Community Centre only to be demolished after the new centre is operational.

Who will build these high quality community facilities? Who will pay for them? When will they be built?

- The text continues:

The longer term impact will depend on Council's servicing and staffing plans for the kiosk and other potential Council buildings within Bungendore. If the services and functions currently undertaken in the Council building are not rehoused within Bungendore, the actual and perceived impact on the community is likely to be a high negative. This impact could be managed and significantly mitigated by Council's communication of clear plans to the Bungendore community and Council staff.

Oh, I get it. It's all someone else's fault and problem. QPC are clearly to blame if the co-called mitigation measures are not undertaken. What if the funds do not cover the costs. Will DoFE pick up the shortfall? Costs that have been generated by DoFE's appalling planning decisions and continuing refusals to own up to their mistakes.

- The 2022 SIA Addendum (Appendix 11a para 3 page 18) then goes on to clarify matters (to avoid a high negative social impact) by passing the entire responsibility for management and mitigation these threat on to a third party that has neither the skill, expertise, funding or inclination to solve ever expanding list of complexities and development problems that have been initiated by DoFE's ill-considered and flawed development proposal:

The social impact created by the proposed school could be managed and significantly mitigated if Council rehouses the services and functions currently provided on the site within Bungendore as soon as possible after their provision on the school site ceases.

In conclusion, if Council provided a clear and achievable pathway for the permanent replacement facilities for the pool, Council offices and community centre, overall the proposal would be likely to result in a neutral short term impact and positive long term social impact.

Once again, there is the litany of blame for QPRC if high negative consequences for the Community eventuate. It seems to be nothing to do with DoE and the Department itself seems not to be responsible for putting in place effective and achievable mitigation measures to support their own planning disaster.

The long term social impact will be a high positive if the new pool, Council offices and community centre are of a significantly higher quality and functionality than the existing facilities, as seems likely. The proposal will then result in the Bungendore community having local access to a new high school, as well as contemporary fit-for-purpose aquatic, community and civic facilities.

“will be a high positive if....”as seems likely....” “proposal will result” Big statements but nothing substantive or tangible. Plans substantiated by just hopes and wishes.

- The same reference spells out the pressing need to recalibrate the SIA to a potential 'high negative effect' on the community because:

However, at the time of writing, it appears that Council has not significantly progressed the design and approvals process for the permanent accommodation of aquatic recreation, Council administration and community space. This leaves limited time before the cessation of Council's use of these facilities, and creates the likelihood of a delay between the decommissioning of existing facilities and their replacement.

So in the Applicants own words, a high positive social impact for the Community, does not seem likely at all. And again, nothing to do with DoE's planning; its all the responsibility of QPRC. I hope the experts at the Dept of Environment and Planning are able to see the contradictions present throughout and have the professional pride and nous to ditch this ridiculous plan.

- **Traffic Projections, Street Parking Congestion and safety**

- *“The site is on a block bounded by Majara, Gibraltar and Butmaroo Streets and Turrallo Terrace. As a new land use, the proposal will generate increased traffic and parking movements around the site. A Transport Assessment was undertaken to assess the potential travel impacts of the proposal.”*
- *Transport Assessment (TA) was undertaken by GHD to identify and assess the potential travel impacts of the proposal. The TA assessed the capacity of the six intersections immediately surrounding the site to accommodate the proposal, with consideration of the Majara Street closure, the provision of two additional roundabouts, background traffic growth and maximum student numbers. The TA found that the surrounding road network can accommodate the school and would operate with space capacity during the peak morning and afternoon periods.*

The transport assessment was made in Nov 2020 at the height of COVID and during school shutdowns and working from home and despite this situation it seems to have been accepted as a firm and accurate basis upon which to build a representation of traffic generation associated with the High School. And a traffic study is an altogether different beast requiring multiple data points and collection activities to establish an accurate baseline. And when that baseline is agreed, future growth factors need to be fully understood and quantified, including the effect on traffic and parking caused new urban developments, future sub-divisions, increases in size of the close by preschool facility also need to be assessed and agreed. And if the population of Bungendore is going to quadruple in size by 2030 and that is part of the HS development proposal there will be an accompanying increase in the size of the primary school population to effects of which appear to have been ignored. When all these matters have been assessed, the additional effect of the proposed high school development needs to be overlaid, quantified and assessed against the changed traffic systems. Come on, this is planning 101!

- *Consultation on the proposal indicates there is a strong perception among some community members that the proposal will increase traffic and negatively impact on the town's road network.*

A strong perception? It's a lot more than that. What's the big secret. Show us basis of the so-called transport assessment and the analysis and the data. Show us something that will give us the trust that you do know what you are doing and how best to go about it. And stop hiding behind bland platitudes. Even your own DofE SSDA recommends full transparency as highlighted below. But DofE continues to dig itself into a hole. Getting deeper and deeper.

- *Traffic generation: the Transport Assessment (TA) considers the road network and associated closure of Majara Street will be able to accommodate the projected traffic movements from the school with sufficient road capacity. As a result, traffic generation associated with the proposal is likely to have a low impact on the community. This impact could be further enhanced by continuing to communicate with the community about the expected traffic movements and access plans, including publicly releasing the findings of the final TA.*
- *Continue to communicate with the community about the closure plans for Majara Street and subsequent traffic movements. Consideration should be given to advertising the final findings of the TA to the community to enable and promote transparency about potential traffic impact*

This plan, as it stands, is bad for the Community, it is not value for money and it attempts to shift the blame for everything going wrong on QPRC and those concerned citizens who want a High School that is future proofed and fit for purpose.

I object most strongly to this amended SSDA.

Yours faithfully,

Clifford Frederick Cole, CSM