

**SAVE BUNGENDORE PARK INC.**

**RESPONSE TO SOCIAL IMPACT STATEMENT DATED 7 SEPTEMBER 2021 AND ADDENDUM**

	<b>Reference to the SIA or other Document/Issue</b>	<b>Comment</b>
1.	Introduction	<p>The original Social Impact Assessment dated 7 September 2021 was deeply flawed. This submission illustrates various illogical conclusions and failures to address various relevant policy documents. Even so, it could only conclude that the project had a “low positive” impact. It is astounding that a major new piece of social infrastructure could draw such faint praise.</p> <p>The Addendum seeks to address certain deficiencies in the original SIA. In doing so, the authors have downgraded their initial assessment, finding that the project has a “neutral” impact.</p> <p>This submission highlights further deficiencies in the SIA and the Addendum. It is submitted in addition to the review and assessment undertaken by Dr Alison Ziller, Lecturer in Social Impact Assessment at Macquarie University, on behalf of Save Bungendore Park Inc.</p> <p>It is also relevant generally in relation to the Applicant’s failure to consider relevant guidelines or strategic planning documents as required by the SEARs.</p> <p>References in this submission to “SBPS” are to items in the Save Bungendore Park Inc. submission lodged in relation to the original SSDA. This is available at <a href="http://tinyurl.com/sbpsubmission">http://tinyurl.com/sbpsubmission</a></p>
2.	Major Changes – removal of community facilities	<p>The original proposal presented to Council and the community, and set out in the SSDA, proposed that the school buildings would include:</p> <ul style="list-style-type: none"><li>- a public-facing council shopfront;</li><li>- a community centre;</li><li>- a “health hub”; and</li><li>- a public library.</li></ul>

		<p>In each case to replace existing facilities being taken over by the proposed school. The SIA was prepared on this basis. This is also the basis on which QPRC gave “in-principle” support to the project and the Department of Education presented the project to the community.</p> <p>The Department of Education announced on 1 July 2022 that these will no longer be part of the development. The Applicant now states in its amended development application that these facilities will be incorporated into a new Council office building, proposed to be built at 19 Gibraltar Street.</p> <p>The Addendum notes that uncertainty around this is a significant negative factor arising out of the project.</p> <p>As discussed below at Item 35, it appears unlikely that site has sufficient room to offer appropriate facilities and the design and timing of any replacement are completely unknown.</p>
3.	Major Changes – assessment in the SIA Addendum	<p>The Addendum notes (p18) that the proposal will create “a neutral impact in the short term”. This is a downgrade from the initial assessment that it would have a “low positive” impact.</p> <p>In any event, this conclusion cannot be sustained. The proposal will result in the demolition of the Community Centre, the swimming pool, removal of public-facing Council offices, excision of a large part of Bungendore Park and Bungendore Common, significantly reduced public access to the remainder of Bungendore Park and permanent damage to Bungendore’s historic civic precinct.</p> <p>The impact of this is strongly negative. The benefits of a local school (which are marginal for much of the catchment travelling from outlying rural areas) do not compensate for this.</p> <p>It is even more absurd that the author appears to blame Council for this impact. The author suggests that “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.”</p> <p>The Applicant cannot compel Council to do this and it would be irresponsible for Council to commit to any replacement until this application has been finally determined.</p> <p>The Applicant forced this project on Council. Councillors have reported that Council’s initial support was only given following explicit threats that the Applicant would acquire the site by compulsory acquisition regardless of Council’s wishes, if Council did not enter into negotiations.</p> <p>The Applicant pursued compulsory acquisition in any event. Council has confirmed that, at the time this process commenced, it was still in negotiations for a consensual sale process.</p>

		<p>Following service of compulsory acquisition notices in December 2021, Council withdrew its in-principle support in January 2022.</p> <p>The project is significantly delayed and faces obvious legal and planning challenges as well as overwhelming community opposition. Save Bungendore Park Inc. has retained Senior Counsel and (along with other community members) is committed to pursuing all avenues of appeal if consent is granted. There is enormous uncertainty in relation to all aspects of this proposal.</p> <p>It is ridiculous to blame Council for failing to commit substantial funds and resources to replace community facilities which are proposed to be stripped from it (against the opposition of Council) for a project which it opposes and which clearly faces significant uncertainty.</p> <p>It would be entirely irresponsible for Council to – as suggested – provide “a clear and achievable pathway for the permanent replacement facilities” unless and until this development applicant has been finally determined and avenues for appeal have been exhausted.</p> <p>There can be no certainty that Council’s financial situation and funding priorities at that time will permit construction of replacement facilities. Even if they do, the planning, development and construction are likely to take at least two years – assuming resources and contractors are available.</p> <p>In short, the negative social impact of this proposal cannot be mitigated in the medium term and may not be mitigated in the long term or at all.</p>
4.	Major Changes – parking on Turallo Terrace	<p>The Revised Proposal includes provision of a significant amount of parking on both sides of Turallo Terrace. This is a major change and was undertaken without consultation with residents. It will have a major negative impact on residents, whose front yards will be dominated by carparking.</p> <p>This presents significant safety concerns, as set out especially at items SBPS 6 and 35.</p> <p>DoE will rely on Council to procure this parking; given Council’s opposition to the project generally it is not clear that this will be achieved.</p> <p>The Addendum fails to consider the strong negative impact of this, particularly on residents of Turallo Terrace. The Applicant must be asked to address this.</p>
5.	Stronger positive impact available at alternative sites	<p>Many of the positive social impacts identified in the SIA could be realised to a much greater extent through construction of a larger school on a more suitable and less divisive site. This could include:</p>

		<ul style="list-style-type: none"> <li>• provision of a larger site, with greater capacity to accommodate future enrolment growth and greater outdoor space; and</li> <li>• provision of shared recreation and community facilities in areas of Bungendore which are currently poorly served by existing facilities concentrated in the town centre.</li> </ul> <p>Further, the negative impacts identified in the SIA would be significantly reduced or largely disappear entirely if this occurs. There are several large, suitable sites on the immediate town periphery which would be available.</p> <p>Failure to realise the potential benefits of building a school on an appropriate site has a significantly negative impact.</p>
6.	Additional strong negative impact – community division	<p>The proposal has caused significant division in the community.</p> <p>It is supported by a virulent section of the community on social media, with reported instances of school bullying directed at children whose parents oppose the plan, as well as public abuse directed at those believed to be associated with the Save Bungendore Park campaign.</p> <p>Community members believed to be associated with the Save Bungendore Park campaign have received death threats and bullets in their letterbox, requiring them to seek assistance from police. Various false and defamatory claims have been made on social media about those individuals and their motivations, in one instance resulting in legal action.</p> <p>The former Member for Monaro, Mr Barilaro and his successor, Mrs Overall, have actively disparaged those campaigning for a more suitable alternative, with Mrs Overall recently describing their campaign as “an attempt at political agitation” in a speech to Parliament.</p> <p>Community members have suffered stress and sleeplessness as well as fear for their property, personal safety and pets as a consequence of this proposal. They feel deeply disempowered by the actions of the Department of Education and the conduct of their local MPs. This will only worsen if the Department of Education continues with this proposal.</p> <p>We noted at SBPS 72 that the proposal has completely railroaded the local Council. Subsequent to that, Council resolved on 27 January 2022 to withdraw support from the proposal.</p>

		<p>The SIA failed to consider the negative social impact on the broader community of such deep division and the inflammatory approach of the State Government, as well as the impact of disempowering local Council and using compulsory processes to subvert existing statutory regimes (see SBPS 67).</p> <p>This impact would be dramatically reduced if an alternative site is chosen.</p>
7.	Additional impact – temporary school construction	<p>The choice of site and the planning complexities have caused major delays to the planning and approval process. Consequently, the Department of Education is proposing that Bungendore High School will open for years 7 and 8 in 2023, in demountable classrooms. It has identified the Bungendore Public School grounds as the “preferred” location for these classrooms.</p> <p>Approximately 23 demountable buildings will be installed on the playground of the Bungendore Public School for the initial cohort.</p> <p>Installing these within the grounds of Bungendore Public School will have a significant negative impact on students attending both schools. It will cause massive disruption and reduction in play space for Bungendore Public School, as well as a less than ideal facility for Bungendore High School.</p> <p>Mrs Overall said in a recent radio interview that this temporary facility would be in place for a maximum of two terms, while construction of a permanent facility on Bungendore Park was completed.</p> <p>However, given the extremely prolonged planning process and ongoing challenges, and the near certainty of legal action if development consent is granted, the temporary facility in the grounds of Bungendore Public School is likely to remain indefinitely and require expansion as additional cohorts join in 2024 and 2025.</p> <p>Rejection of this development application will require the Applicant to commence planning on a more feasible and less controversial site, offering certainty as to timing which will be strongly positive for both schools. By way of illustration, the SSDA for the nearby Jerrabomberra High School – on a greenfield, uncontroversial site – went on public exhibition in November 2021, it was approved in July 2022 and construction started soon after.</p> <p>This SSDA went on exhibition in September 2021 and if development consent is granted, it is likely to be further 1-2 years before legal avenues are exhausted and construction of a project can commence. It is likely to be a further 12-18 months before a permanent school can open and several months after that before demountables can be removed and the grounds of Bungendore Public School remediated. It may be 2026 before Bungendore Public School is able to resume normal operations.</p> <p>The SIA must address the impact of this on both the Primary School and the proposed High School. This impact could be significantly mitigated if this DA is withdrawn and the Applicant acquires a suitable site for this project.</p>

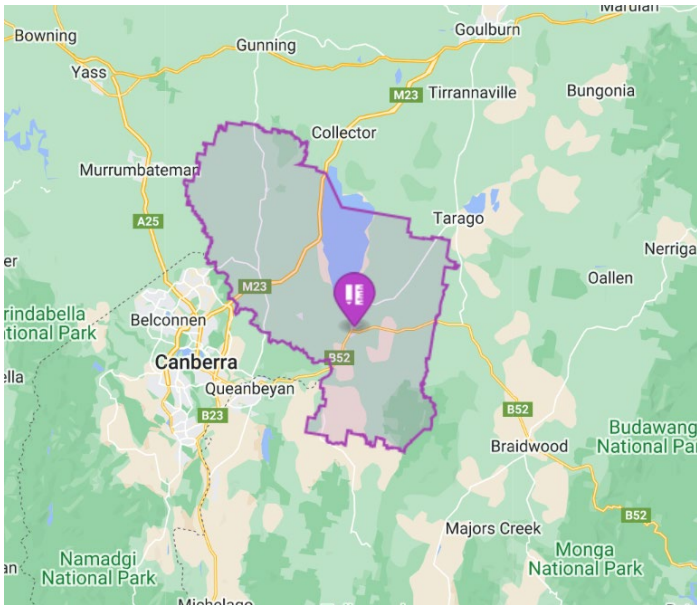
8.	Additional impact – financial	<p>To the extent that it's relevant to the social impact assessment, it should be noted that the "Estimated Total Cost" of this project, as set out in the NSW State Budget 2022-23 is \$71m. This is significantly higher than the estimated total cost of a larger school, on a larger site in nearby Jerrabomberra (\$57m) and in the top five most expensive school projects in all New South Wales. See <i>Infrastructure Statement 2022-23 – Budget Paper No. 3</i>, available at <a href="https://www.budget.nsw.gov.au/sites/default/files/2022-06/2022-23_Budget-Paper-No-3-Infrastructure-Statement.pdf">https://www.budget.nsw.gov.au/sites/default/files/2022-06/2022-23_Budget-Paper-No-3-Infrastructure-Statement.pdf</a>.</p> <p>It is unclear why the cost of a project which was intended to take advantage of existing assets (the oval and the Palerang Council chambers) should be so expensive. The disproportionate cost of this project is diverting public funds from other school or public projects which could have a much stronger positive impact.</p>
9.	QPRC Towards 2040 Local Strategic Planning Statement ( <b>LSPS</b> ) – Planning Priority 10 – 4.10.5 – "4.10.5 Investigate housing and service needs to support additional aged population in Braidwood and Bungendore."	<p>See SBPS 4 – "Failure to consider proposed Abbeyfield development". There is a critical shortage of seniors' accommodation in Bungendore, requiring older residents to move to Canberra or Queanbeyan if they require additional support. The revision history of Schedule 1 to the Palerang Local Environmental Plan indicates that the original Abbeyfield site at 4-6 Majara Street was set aside for seniors' housing in early 2018.</p> <p>Note that there has been no progress in relation to the New Abbeyfield Site. In any event:</p> <ul style="list-style-type: none"> <li>• closure of the road reserve in order to deliver the New Abbeyfield Site is unlikely to be permitted under s38A of the Roads Act 1993 (see SBPS 74);</li> <li>• State Design Review Panel specifically requires ensuring "visual access is maintained from Majara Street through to the river". This would prevent development on the New Abbeyfield Site (see <a href="https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-14394209%2120211224T000508.854%20GMT">https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-14394209%2120211224T000508.854%20GMT</a> para 7).</li> </ul> <p>The Addendum to the SIA incorrectly describes the proposed site and the process to date (p16). The Applicant must update the SIA to reflect the current status of the Abbeyfield development.</p> <p>It is also absurd that the Addendum to the SIA concludes neutral impact. Ongoing delays with the proposed High School and uncertainty around the site (which has now changed twice) are a direct consequence of the Applicant's intransigence. This has delayed Abbeyfield significantly, and its ongoing impact is still felt by many in the community.</p>

10.	QPRC Towards 2040 Local Strategic Planning Statement ( <b>LSPS</b> ) – 5.2 Bungendore – Overview of Bungendore p46	<p>LSPS notes “grid pattern ... and low scale development creates an open, informal and spacious character ... bounded by Molonglo Street, Rutledge Street, Majara Street and Turallo Terrace.”</p> <p>The proposed development will include significant construction and fencing fronting Turallo Terrace and crossing Majara Street. The SIA should consider the impact of this inconsistency with the Strategic Plan.</p>
11.	QPRC Towards 2040 Local Strategic Planning Statement – Planning Outcomes for Bungendore p50	<p>LSPS notes planning outcomes should ensure:</p> <ul style="list-style-type: none"> <li>• “...a strong sense of rural living, and space, remain intact...</li> <li>• Village/townscape setting retains a country/heritage feel appealing to residents and visitors...</li> <li>• Preservation and improvement/extension of Bungendore Common and other green spaces to allow for walking, cycling, dog walking...”</li> </ul> <p>The proposed development will involve reducing the area of Bungendore Park and significantly reducing its availability to the public. It will involve reducing the area of Bungendore Common, contrary to the planning outcomes proposed in the LSPS.</p>
12.	QPRC Towards 2040 Local Strategic Planning Statement – Planning Actions for Bungendore p51	<p>This lists Planning Priority 1 as “Implement the recommendation of the Bungendore Heritage Study 2019”.</p> <p>The Bungendore Heritage Study 2019 recommended undertaking a study of Bungendore’s non-built heritage, which was not part of this study. This would include considering the heritage significance of Bungendore Park. It has not been undertaken. See SBPS 142.</p> <p>The Bungendore Soldiers’ Memorial is proposed to be nominated for inclusion on the state-significant heritage register (see SBPS 10 and 93), discussed further below at para 40.</p>
13.	Bungendore Structure Plan p35	<p>Confirms the importance of controls “capable of conserving the character of any infill development that occurs within the original village area.”</p> <p>The proposed development is a significant infill development within the original village area.</p>
14.	Consideration of the Palerang Development Control Plan ( <b>PDCP</b> )	<p>PDCP includes controls relating to limiting visual impacts, particularly where viewed from major transport corridors. The proposed development is likely to be visible from several major transport corridors including Tarago Road and Kings Highway – see SBPS 98.</p>

15.	3. – Policy Context – South East and Tablelands Regional Plan, p8	<p>The SIA refers variously to the “South West and Tablelands Regional Plan” and “South West Tablelands Regional Plan.” It appears the authors may have intended to refer to the South East and Tablelands Regional Plan – although it seems unlikely they considered it any detail if they used two different incorrect names.</p> <p>The SIA notes that the SWTRP (sic) stresses the importance of the region’s rural landscapes to the Aboriginal people.</p> <p>Bungendore Common is the subject to two separate undetermined claims under the Aboriginal Land Rights Act. It is situated on the Turallo Creek flat, just upstream of Lake George – which the Bungendore Structure Plan notes is a known significant Aboriginal cultural heritage site.</p> <p>It is understood that the State Government persuaded the land claimants to withdraw their claims to permit the acquisition of the Common and construction on the site. The terms of any agreement are not known, but the SIA fails to consider the impact of potentially strong-arming the claimants to withdraw claims to an area of known significance, which had been in place for many years and had not been properly assessed or determined.</p>
16.	3. – Policy Context – Theme – “Increasing access to education facilities”, p8	<p>The SIA states that the Regional Plan “recognises that school in Canberra are facing increasing enrolments and capacity pressures. Increasing access to schools for NSW border residents is therefore identified as a key planning priority in the Regional Plan”.</p> <p>This misrepresents the plan’s priorities. The Regional Plan (again, presumably the “South East and Tablelands Regional Plan”) notes on p45 that:</p> <p style="padding-left: 40px;">Schools near the NSW-ACT border face increased enrolments, and many schools have the capacity to use infrastructure more effectively. To achieve this, school catchment boundaries may be realigned and students directed to schools with surplus classrooms. Where appropriate, existing school assets will be renewed to provide contemporary learning spaces for students.</p> <p style="padding-left: 40px;">New schools, if required, <b><i>will be established where there are no other sustainable options available within existing assets.</i></b> (our emphasis)</p> <p>It is understood on the basis of a summary document obtained from the office of the Minister for Education that the Department of Education’s “Service Needs Report - Queanbeyan Yass SCG Package” dated 14 November 2019 concluded that sufficient capacity existed in the district and a high school was not needed in Bungendore. The Department has refused requests under the Government Information (Public Access) Act to release the full report, the business case or other records which would demonstrate the need for the development.</p>



		<p>The plan also notes that master planning for new developments should optimise shared facilities for community and school uses. There are several major new developments being planned around Bungendore which would offer the opportunity to include a properly planned school site and which could allow residents in these new developments to take advantage of shared facilities.</p>
17.	3. – Policy Context – Theme – “Accessing sports and recreation facilities”, p9	<p>The “summary of findings” set out in this section of the SIA are not consistent with the policy documents referred to in the SIA. The SIA appears to have misrepresented those documents.</p> <p>Specifically, the Bungendore Structure Plan notes (p 34) that the proposed Sports Hub “could include a new swimming pool, depending on funding”, or alternatively contemplates that the existing pool could be upgraded (p14). It does not propose any course of action, contrary to the statement in the SIA that “the pool is intended to be moved...” This is also consistent with the Bungendore Park Master Plan linked below at 42</p> <p>The SIA also fails to note the clear intention from the Bungendore Structure Plan that the Sports Hub is intended to supplement and relieve pressure on existing facilities, rather than replace them. It notes that the sports hub will offer “<b>new</b> open space and recreation facilities” (our emphasis).</p> <p>Plans for the sports hub long pre-date and are unrelated to the current high school proposal. It is disingenuous for the summary in the SIA not to make this clear. The Sports Hub is already nearing completion. Any positive impact from that development will occur regardless of whether the proposed High School development is approved.</p> <p>Finally, Council resolved in its meeting of 18 December 2019 that the Bungendore Structure Plan should be amended to “encourage the Turallo Creek corridor to be preserved as open space for recreation.” The proposed Ag Plot is situated in the Turallo Creek corridor, on Crown land which is reserved for public recreation. The proposed development would be contrary to the resolution of Council.</p>
18.	3. – Policy Context – Theme – “Maintaining the rural character and lifestyle of Bungendore”, p9	<p>The SIA notes the principles identified in the BSP to:</p> <ul style="list-style-type: none"> <li>• Retain the historic grid pattern. While the Revised Proposal includes modifications to preserve some of the visual axis of Majara Street, it is likely that this will be obscured by school gates/fencing, and will in any case lose its function as a road. If Abbeyfield is built as proposed on the Majara Street reserve (instead of at 4-6 Majara Street, adjacent to the Palerang Council building, as proposed prior to the school plan and set out in the PLEP) it will obscure this aspect.</li> </ul>

		<ul style="list-style-type: none"> <li>• Preserve, improve and extend the Common. However, the SIA subsequently refers to the Common only as the “Turallo Terrace dog off leash area”, meaning a reader might not be aware that the proposed development will result in the subdivision, fencing and development of a large part of the Common, contrary to the priorities identified in the BSP. This is highly misleading.</li> </ul>
19.	4.1 – Social Locality – p10	<p>The SIA fails to acknowledge Bungendore’s role as a rural centre, servicing communities including Tarago, Bywong, Wamboin, Hoskinstown, Captains Flat, Mt Fairy and Mulloon. Both the social and recreational infrastructure of the town, as well as any proposed high school, will need to support these districts. This is clear from the proposed school catchment:</p>  <p>Source: <a href="https://schoolfinder.education.nsw.gov.au/">https://schoolfinder.education.nsw.gov.au/</a></p> <p>Instead, the SIA refers to Bungendore as a “suburb” on five separate occasions. The social baseline set out in the SIA is inappropriately scoped.</p>

20.	4.1 – Social Locality – Picture 12 – p12	The picture is mislabelled. The Poet’s Corner (sic) is in fact the Bush Balladeers’ Place of Recognition. The SIA has not considered the importance of this site or the social impact of its relocation, as discussed further below at 41.
21.	4.2 – Community Profile – Future Bungendore Population – p13	<p>This notes a projected increase in population of only 3.6% by 2036, and a steady population of children and adults aged 35-49.</p> <p>This is unsupported and appears inconsistent with the Bungendore Structure Plan, which identifies a “steady growth” scenario of 3.3% adding only 37 dwellings per annum. In the last two years, Council has approved two large subdivisions in Elmslea, with 176 Tarago Road rezoned to allow subdivision into 328 lots on 15 May 2020 - or almost 9 years’ growth. In addition, the proposed East Bungendore development, which has received gateway approval, is likely to add up to 800 lots.</p> <p>It appears likely that the “steady growth” scenario used in the SIA has dramatically underestimated Bungendore’s likely future growth and the demand for social and recreational infrastructure. Conclusions based on this underestimate must be re-assessed.</p>
22.	4.2 – Community Profile – Lower proportion of ATSI residents – p13	<p>The SIA notes that Bungendore has a very low population of residents identifying as Aboriginal or Torres Strait Islander.</p> <p>While it suggests important measures to mitigate the social impact of the development on this community, those measures may be of limited effect, given the very low indigenous population.</p>
23.	4.3 – Education Context – ACT and NSW school context – p14	<p>The relevance of this is not clear.</p> <p>There are established schools in Queanbeyan, Yass, Braidwood and Goulburn which current service the proposed school catchment. Schools in Canberra are significantly further than existing options for most students in the proposed Bungendore High School catchment. Concerns about reduced access to ACT schools may reflect individual preferences for the curriculum, high school/college model or BSSS system available in the ACT, rather than a lack of accessible options in NSW. Those concerns will not be alleviated by providing a school teaching the NSW curriculum in Bungendore and consequently a local school will have no positive impact on those who prefer the ACT system.</p> <p>A significant unspoken factor not addressed in the SIA is that public schools in Queanbeyan, 23km from Bungendore, may be perceived as less prestigious.</p> <p>ACT schools remain available, but the ACT Government has now zoned Bungendore children to less prestigious schools. Much of the perceived urgency of a Bungendore High School has been because the preferred public</p>

		<p>schools in Canberra are no longer available, and not because of an actual lack of alternatives in Canberra, Queanbeyan or elsewhere in NSW.</p> <p>For the same reason, the argument about unreasonable travel times should be dismissed. Bus travel to Canberra may take some time, but there are much closer options in NSW. It's irrational to cite reduced availability of schools in Canberra as a relevant factor, and at the same time cite unreasonable travel times to school in Canberra.</p> <p>If the author of the SIA considered the "ACT and NSW school context" relevant, it is essential that this highly nuanced context is understood. In short, the perceived problem of unreasonable travel and lack of access to Canberra is not lack of access to schools, but lack of access to <i>preferred</i> schools.</p>
24.	4.3 – Education Context – Local school context – p14	<p>The SIA notes that "Queanbeyan High School is the only existing NSW high school that includes Bungendore in its school catchment area." Again, it fails to consider the broader context. For example, children in Mount Fairy (in the proposed BHS catchment) are zoned to Goulburn but also have options in Braidwood, Yass or Queanbeyan. Children east of Murrumbateman will be zoned to Bungendore but are currently much closer to Yass High School. Their journey will be increased.</p> <p>Further, Jerrabomberra High School (opening 2023) is likely to alleviate pressure on the two state high schools in Queanbeyan and create additional capacity at those schools, while the recently-opened Anglican School at Googong offers a private school option in the immediate vicinity for Bungendore families.</p> <p>According to an estimate prepared by a community member, the combined enrolment at various primary schools in the district supporting the proposed catchment is almost equal to the enrolment at Bungendore Public School – and a large proportion of students at BPS come from outside Bungendore village. It can therefore be anticipated that half (or even more) of students attending Bungendore High School will be travelling from outlying areas. The impact of the proposed development on this large cohort is neutral, as they will be required to travel large distances, regardless of whether they attend school in Bungendore or elsewhere. The SIA fails to make this distinction or consider the rural cohort.</p> <p>The SIA's description of the local school context is clearly incomplete.</p>
25.	4.4 – Engagement Outcome – Overall community sentiment p15	<p>The statements in the SIA are wrong. See SBPS 14, 118 which illustrate this. Note also that the recent Local Government Elections elected a Council which stood on a platform of opposing this development.</p> <p>Some surveys may have been influenced by the announcement (in conjunction with this proposal) of various planned upgrades to facilities at Bungendore Public School (and in fact this is noted prominently on the School</p>

		<p>Infrastructure NSW project page as if it were part of the proposal). However, those upgrades are not part of the SSDA and may have skewed the results of surveys.</p> <p>Other respondents may have been influenced by the original plans to include new community facilities as part of the high school development. These plans have now been abandoned and, as noted in the Addendum, there is significant uncertainty around the provision of replacement facilities.</p> <p>Further, there were 321 submissions to the SSDA and the overwhelming majority of those from the public were objections.</p> <p>There have been very few opportunities for any transparent expression of community sentiment. One of these was the Council resolution of 28 April 2021 to close Majara Street (which was required for the proposed development). Council received 160 community submissions in relation to the proposed closure; 88 strongly opposed closing Majara Street, for a variety of reasons - many setting out detailed responses, explaining their concerns.</p> <p>Some were neutral, but only 68 submissions supported closing the road – the vast majority being one-liners to the effect that any high school was worth it, at any price to the community.</p> <p>The SIA clearly misrepresents community sentiment. It fails to consider the impact of imposing a project on the community which has been overwhelmingly rejected.</p>
26.	4.4 – Engagement Outcome – Consultation with Aboriginal and Torres Strait Islander communities p15	<p>The SIA does not include any discussion of the land claims under the ALRA which the State Government has procured to be withdrawn. Forcing claimants to abandon long-standing claims to Country must have a strongly negative impact.</p> <p>The SIA refers to “strong support for the inclusion of shared facilities on site as a means of fostering social connections and inclusivity...” This is no longer relevant as these facilities will no longer be part of the development.</p>
27.	4.5 – Areas of Social Influence p16	<p>The SIA purports to consider “the social locality, demographic data and engagement outcomes”, concluding the impact will be “mostly confined to Bungendore”.</p> <p>Again, this demonstrates that the SIA is flawed and has failed to consider Bungendore’s role as both a rural and a tourist centre. In particular:</p> <ul style="list-style-type: none"> <li>• in referring to “current and future secondary students resident in Bungendore”, it fails to consider the large catchment of students resident <b>outside</b> Bungendore;</li> </ul>

		<ul style="list-style-type: none"> <li>in referring only to “Queanbeyan-Palerang LGA residents”, it has disregarded rural communities and villages immediately to the north (in Goulburn-Mulwarree), for whom Bungendore is the closest major centre, or residents of Yass Valley Shire, a large part of the eastern area of which falls within the proposed Bungendore High School catchment.</li> </ul> <p>The importance of the area to tourists is illustrated in this article: <a href="https://savebungendorepark.org/blog/the-railway-station-that-represents-all-we-have-to-lose">https://savebungendorepark.org/blog/the-railway-station-that-represents-all-we-have-to-lose</a>. Further, Bungendore Park is a very popular stop for families travelling between Canberra and Batemans Bay. The proposed development will have a significant impact on these users of the Park.</p>
28.	5.1 – Neutral to Low Impacts p17	<p>The SIA fails to consider:</p> <ul style="list-style-type: none"> <li>Noise and vibration impact on the Bungendore Preschool or Bungendore Public School. See SBPS 6 and 7;</li> <li>Impact on the Signalmans Cottage (northern end of Majara Street), which will now be immediately adjacent to the school games courts and exposed to noise from ball games, or the Stationmasters Cottage which will effectively be marooned within the school grounds;</li> <li>Impact on residents of Butmaroo St and Turallo Terrace, identified as construction parking and sites for school parking, respectively. The project will have a high impact on these residents, especially with traffic being diverted from Majara Street.</li> </ul>
29.	6.1 – Engagement and integration of Aboriginal Culture p20-21	<p>As noted, part of the site is subject to two unresolved Aboriginal land claims, in an area of known significance. The State Government has procured the withdrawal of those claims; the circumstances under which it did so are not known but the impact on the claimants must form part of the SIA.</p> <p>The proposed mitigation is mere window dressing given much more significant issues such as the forfeiture of unresolved land claims.</p> <p>The SIA refers to “relocation the existing sandstone rotunda to preserve its potential for social interaction”. Presumably this is intended to refer to the Balladeers’ Place. This is not relevant to this part of the SIA. As noted in SBPS 94, the Department of Education failed to understand the nature of the Place or consult with the relevant custodians, the Bungendore Country Music Muster Committee.</p> <p>This is discussed below in relation to Section 6.6 of the SIA.</p>

30.	6.1 – Engagement and integration of Aboriginal Culture – Management measures p21	<p>The SIA states that “there was no indication of an Aboriginal gravesite on site.”</p> <p>The gravesite is shown in historical photographs (widely circulated in the town) and marked on the Bungendore Park Master Plan. Older residents remember it clearly. Its existence should be acknowledged and commemorated - continued denial of its existence increases the impact of the proposal and the hurt felt by the community.</p>
31.	6.2 – Improved access to education p22	<p>Again, the SIA has failed to consider the rural catchment. Primary schools in outlying areas such as Sutton, Tarago, Captains Flat and Gundaroo will feed to the proposed school. Construction of a school in Bungendore will not materially change those students’ access to local schooling; in fact for many (such children in parts of Wamboin), distance to school will increased as they are zoned to Bungendore rather than a shorter journey to Queanbeyan.</p> <p>The SIA fails to consider the negative impact on those students forced to travel further, nor does it consider that there will be no (or no material) benefit for a very large proportion of students whose travel times won’t change materially.</p> <p>As noted in SBPS 13, the new school may affect the viability of HSC pathways at Braidwood Central School. The possibility and impact of this must be addressed.</p> <p><i>Impact of the proposal</i> – this misrepresents community sentiment. As noted in SBPS 14, community supports a high school generally but this particular proposal faces massive community opposition.</p> <p>Further, it is not correct to state that this is “an area of identified need”. As noted above, the Department of Education’s “Service Needs Report - Queanbeyan Yass SCG Package” dated 14 November 2019 concluded that sufficient capacity existed in the district and a high school was not needed in Bungendore.</p>
32.	6.2 – Improved access to education p22	<p>The EIS states that the school will have capacity for “up to” 450 students.</p> <p>The Department of Education estimates, according to records released pursuant to the Government Information (Public Access) Act, that student numbers will reach 478 in 2026, 511 in 2031 and 566 in 2036. This means that the school will exceed its design capacity with 3 years (at the most) of opening.</p> <p>The basis for these estimates was not released, although in conversations it appears the Department was not aware of major subdivisions proposed to the north and east of the town – so they may be an underestimate.</p> <p>The site is already extremely constrained, with very limited open play space. Any expansion will encroach further on open space.</p>

		The SIA fails to address the impact of providing overcrowded facilities, or of further expansion across public open space.
33.	6.3 – Access to open space and recreation facilities p23	<p>The SIA notes that community access to Mick Sherd Oval will be restricted; but it does not mention that a 6,000sqm section of Bungendore Park itself will be permanently excised and developed.</p> <p>The assessment and mitigation measures do not consider the additional impact of the compulsory acquisition of those public facilities. The SIA must address the impact on the community and the alienation felt from forcibly taking community assets, over the opposition of the community and the elected Council.</p> <p>The SIA contains (in a relevant context) only a single reference to Bungendore Park, and 38 references to “Mick Sherd Oval”. It is clear the authors are unaware that the Oval is merely a part of a large town park which offers a wide variety of recreational opportunities.</p> <p>It appears that the authors either sought to present the project as affecting only an Oval, or they were unaware of its location and significance as part of a much larger public space. Either way, the SIA has failed to consider properly the social impact of the loss of a large part of Bungendore Park.</p> <p>Similarly, the SIA refers to the “dog off leash area” rather than Bungendore Common. Although the part of the Common which is to be developed is frequently subject to flooding, this area is extremely popular and heavily used. It is surprising that the SIA implies that the facility is inadequate – it is large, open, shaded by trees along Turallo Creek and community members have provided chairs. The suggestion that it requires fencing and should be moved would come as a surprise to its many users.</p> <p>A Save Bungendore Park supporter illustrated the importance of this area in the article available here:  <a href="https://savebungendorepark.org/blog/dog-tails">https://savebungendorepark.org/blog/dog-tails</a></p>
34.	6.3 – Access to open space and recreation facilities – Impact of the proposal p24	<p>It is misleading to say that the proposal will “restrict access to Mick Sherd Oval during school hours”. In fact, it is understood that the public will be prohibited from using the oval during school hours.</p> <p>Further, the SIA refers only to Mick Sherd Oval and the Pool. It fails to note that a large section of the eastern side of Bungendore Park will be excised, used for school construction and permanently lost to the community. The SIA must consider the impact of this.</p>
35.	6.3 – Access to open space and recreation	<p>See SBPS 84.</p> <p>The SIA refers to Warren Little Oval. The June 2019 draft of the Bungendore Structure Plan notes that:  The oval does not have an amenities building, nearby parking or any lighting...</p>



	facilities – Open space and recreation access p24	<p>The oval is considered to be too small by the community. The facilities are inadequate. It is located entirely within floodway. The floodway location will mean it will be difficult to provide amenities in close proximity. It is located in a meander, meaning a large flood may significantly impact through the re-direction of the channel.</p> <p>The potential availability of Warren Little Oval does not mitigate the impact of losing a very large part of Bungendore Park. SBPS 84 discusses the limitations of Warren Little Oval and shows the state of the oval after moderate sustained rainfall.</p> <p>The availability of Warren Little Oval does not mitigate the impact of losing part of Bungendore Park forever, and losing much of the remainder during most daylight hours.</p>
36.	6.3 – Access to open space and recreation facilities – Pool access p25	<p>The SIA notes the importance of community swimming pools in general, but fails to acknowledge or consider the particular significance of this pool, which was funded and built by the local community. The history is summarised here: <a href="https://savebungendorepark.org/blog/the-bungendore-public-swimming-pool">https://savebungendorepark.org/blog/the-bungendore-public-swimming-pool</a></p> <p>The loss of this pool, given its unique history, will have a particularly strong social impact, even if it is replaced by a new facility (which is yet to be funded or confirmed).</p> <p>In any event, there is no certainty around the timing of construction of any replacement.</p>
37.	6.3 – Access to open space and recreation facilities – Residual impact (considering management measures) p26	<p>The Sport Hub was intended to alleviate pressure on existing public open space, rather than replace that. It was conceived and planned to supplement existing facilities. It is a significant distance from existing facilities and is not proposed to offer informal recreation space, as Bungendore Park does.</p> <p>The Sport Hub is sited a long distance from the major population of young families, concentrated in Elmslea (north of Turallo Creek), requiring pedestrians to cross Kings Highway, which is an extremely busy road especially with holiday and weekend traffic travelling between Canberra and the NSW South Coast. It is too far to be easily walkable and too dangerous for children to walk or ride unaccompanied.</p> <p>The SIA also fails to consider the context of rapid growth in Bungendore and rapidly increasing demand for recreational space. The impact of losing major, centrally located recreational facilities will increase as the demand across the town increases.</p> <p>There is still significant uncertainty in relation to any replacement facilities.</p>

38.	6.4 – Access to community infrastructure p26	<p>The proposal will no longer include the development of a new community centre.</p> <p>While it is suggested that a new community centre will be constructed as part of the new Council office to be built on Gibraltar Street, the plans for this site are yet to be finalised.</p> <p>The current community centre is described in the valuation report prepared by Opteon (BHS 166) as:</p> <p style="padding-left: 40px;">The subject property comprises a commercial office building situated on an SP2 (Infrastructure) zoned site of 1,898 sqm (approx.) on the fringe of the commercial precinct of Bungendore. The site is a regular shaped parcel that is generally level throughout and has good easy access via a bitumen sealed road with kerbs, gutters and footpaths. The property is located on a medium profile street with reasonable exposure to passing trade. The current zoning allows for 'health services facilities' to be utilised on the subject property.</p> <p style="padding-left: 40px;">Improvements include a circa 1986 brick commercial office building with offices, meeting rooms and amenities, providing an NLA of approximately 411 sqm (approx.). Ancillary improvements include porches, outdoor covered area, fencing, garden shed and kid's play equipment.</p> <p>It is unclear that any replacement facility which might be (although at this stage is not committed to be) constructed on the site of the new Council office could offer similar size or facilities. This is because any new Council office will need to include provision for current Council staff and facilities (currently occupying the current Council building with an internal NLA of 1325 sqm) and the Bungendore Public Library, which is proposed to be moved from its current site in the grounds of Bungendore Public School, into the new Council building.</p> <p>Council noted in the Agenda for its 27 January 2022 meeting (Item 10.1) that:</p> <p style="padding-left: 40px;">Consequent to the 2020 Department of Education (DoE) proposal and resolutions of Council, 19-21 Gibraltar Street was acquired for the purpose of a new Council office in early 2021. At the time, the Council customer, library and community centre was proposed to be constructed by DoE within the school precinct fronting Turallo Tce and adjacent to the multipurpose school hall. The SSDA was lodged by DoE to that effect.</p> <p>As is clear, the site acquired for the new Council office was not intended to have capacity to accommodate extensive community facilities and was acquired with the expectation that those facilities would form part of the new high school development. The site (Lot 8/11, DP758183) is 2023 sqm. It clearly does not have capacity to include community, council and library facilities of a similar scale to existing assets. If these facilities are built (which is not confirmed), they may be smaller and offer poorer facilities than the existing infrastructure.</p>
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		Further, the timing of construction on any new Council or community facility is uncertain. No designs have been presented for the new Council buildings and as yet there has not been any community consultation in relation to this project.
39.	6.4 – Access to community infrastructure – SIA recommendations p27	<p>The SIA refers to consultation with “the existing users of the Bungendore Community Centre”.</p> <p>Members of various organisations which use the Community Centre (such as the Bridge Club) have reported that no consultation was undertaken with their organisations.</p> <p>In October 2021, families with kids attending Country Kids Club after school care at Bungendore Community Centre were informed that the Club would be closing down permanently as a result of the high school proposal.</p> <p>The Club had planned to move to the Bungendore Scout Hall. The Director’s email to parents noted that it was refused approval from the Commonwealth regulator, noting “several issues have come up in particular the risk assessment conducted for the access from the Scout Hall to the School with the route changes when the build for the High School commences.”</p> <p>So after taking a proper look at the traffic arrangements, when hundreds of kids and thousands of cars, trucks and buses are converging on Bungendore Park every day, the regulators concluded that it was simply too unsafe. This assessment should apply equally to the high schoolers and preschoolers using that area.</p> <p>A local business will be forced to shut down and a vital community service will be forced to close. As one parent said: “Not only does this mean we are now going to have to try to get our kids into the already long waitlist for the other Before and After School care program, our kids are going to have to be resettled into new environments and staff.... as a direct result of this ridiculous proposal.”</p> <p>The SIA has not considered the impact of this.</p>
40.	6.4 – Access to community infrastructure – Management measures – Development of new Scout Shed p27	<p>None of the SSDA documents or the SIA have identified the need for an additional Scout shed. The Scout shed is large and very new (ca 3 years old), and it is surprising that it might be too small or otherwise inadequate.</p> <p>While this may be positive for the Scouts, it doesn’t address any identified need or present any benefit to the broader community.</p>
41.	6.4 – Access to community infrastructure – Residual impact	<p>There is no clarity around the shape or timing (or certainty) for replacement of community facilities.</p> <p>Further, given constraints on the site for the proposed Council office/shopfront/library/community centre/health centre, it is unlikely that facilities of a similar nature can be offered at the proposed Gibraltar Street site.</p>

	(considering management measures) p27	The statement in the SIA can't be supported.
42.	6.5 – Access to Council services p28	<p>See above, noting the removal of community facilities from the proposed School development, the uncertainty around timing and the limitations of the proposed Gibraltar Street site.</p> <p>Further, it is unlikely that Council will take definitive steps towards construction of a replacement facility, given the significant uncertainty that will continue until all legal avenues to challenge the proposed development have been exhausted. If the development proceeds, this will inevitably delay the provision of replacement facilities.</p> <p>As noted in the SIA, the ongoing uncertainty is having a significant impact on Council staff.</p>
43.	6.6 – Change to Character p29-30 – visual impact and Bungendore Soldiers' Memorial	<p>SBPS 125, 51 and 92 note flaws in the visual impact assessment.</p> <p>The earliest heritage assessment, prepared for the former Yarrowlumla Shire Council by David Scobie in 1982 identifies Bungendore Park as a "traditional town park", a "significant precinct" and a "major area of visual importance". He saw the need to "maintain the town park character with its formal setting opposite the major town institutional buildings." Scobie also recognised the consistency of the buildings in the town centre, the importance of the open backdrop along Gibraltar Street to the hills beyond and stressed the need to preserve this.</p> <p>The Bungendore Soldiers' Memorial was nominated for inclusion on the State Heritage Register as a unique example of its style. SBP 141 and elsewhere discuss the impact on the Memorial of this development and notes that the Heritage Assessment failed to consider the statement of significance for this site.</p> <p>The State Heritage Register Committee considered the nomination on 1 March 2022. According to the Minutes of that meeting, the Committee "noted that Bungendore and District War Memorial is managed by local government, it is on the LEP, and is not under threat."</p> <p>It "resolved that the Bungendore and District War Memorial is adequately managed at the local level and closed the nomination."</p> <p>It appears that the Committee was not aware of the proposed development, which will significantly impact the Memorial.</p> <p>The SIA fails to consider the particular impact of this on the Bungendore community, which has a particularly large veteran, current and ex-service community given its proximity to Headquarters, Joint Operations Command</p>

		on the edge of the town. Further, the families of many of those commemorated on the Memorial still live in the town and district and its loss of prominence and potential for damage and vandalism will have a particular impact on them.
44.	6.6 – Change to Character p29-30	<p>This section of the SIA repeats the wrong and irrelevant comments about the Balladeers Place.</p> <p>As noted in SBPS 94, the Department of Education failed to understand the nature of the Place or consult with the relevant custodians, the Bungendore Country Music Muster Committee.</p> <p>Save Bungendore Park Inc. was invited by the Bungendore Country Music Muster Committee to join a call with the Department of Education on 14 March in relation to the proposed Bungendore High School. This was arranged in response to Item 12 of the Key Issues List attached to DPIE’s letter of 16 November 2021.</p> <p>During that call, we asked for the opportunity to review any report of the call prior to its submission to DPIE or circulation internally within the Department of Education. We felt this was necessary because the Environmental Impact Statement and the Consultation Outcomes Report lodged for the project did not appear to be an accurate reflection of discussions which various community groups have had with DoE in relation to the project.</p> <p>Stuart Bicknell, the community engagement manager from DoE, indicated that this should be possible. However, despite repeated requests, this did not occur.</p> <p>As a very brief summary of the call, the Committee:</p> <ul style="list-style-type: none"> <li>• Explained in detail the history of the site, its design and its social and cultural importance, which extends far beyond Bungendore;</li> <li>• Reiterated its strong opposition to the school proposal and the relocation of the Balladeers’ Place;</li> <li>• Expressed its disappointment at the Department of Education’s failure to undertake any consultation prior to announcing the Bungendore High School project and the proposed relocation of Balladeers’ Place;</li> <li>• Queried what it would take before the opposition from a large number of community groups, and the various challenges facing the Department of Education, might finally cause the Department to re-assess the project;</li> </ul>

		<ul style="list-style-type: none"> <li>• Reiterated its opposition to the proposed relocation of the Balladeers' Place to Frogs' Hollow, noting that this was an obscure site, detached from the town centre, flood-prone, unpopular with visitors and teeming with snakes;</li> <li>• Stressed that any alternative site would need to be central and prominent within Bungendore village proper; and</li> <li>• Rejected the suggestion that the Balladeers' Place could be relocated to another site on Bungendore Park, noting the limited space available on the Park if the school proceeds (and noting recent construction of additional courts, playgrounds and carparks further eroding this space).</li> </ul> <p>The Committee also asked who would be responsible for any move and how it (and any planning permission) would be procured. DoE was unable to give any information around this; we reiterated that this must be the responsibility of DoE and that the Committee was not in a position to undertake this itself.</p> <p>Clearly, the SIA has failed to appreciate the significance of the site, and the proposed mitigation measures are both uncertain and have been developed without any consultation with the relevant community organisation.</p>
45.	6.6 – Change to Character – SIA recommendations p30	<p>The SIA recommendations include “prioritise the selection of native species across the site to better integrate with the existing natural landscape”.</p> <p>The basis for this recommendation is not clear. Bungendore Park is a classic 19th century town park, with significant plantings of exotics. The authors may not be familiar with the Bungendore Park Master Plan, adopted by the former Palerang Shire Council on 4 September 2014 and available (at least in part) here: <a href="https://drive.google.com/file/d/16EglPeNP0cRy-rYlo_ocZsZzxntgbFfd/view?usp=sharing">https://drive.google.com/file/d/16EglPeNP0cRy-rYlo_ocZsZzxntgbFfd/view?usp=sharing</a></p> <p>Note that none of the planning documents has referred to the existence of this Master Plan. It was not considered in any part of the DA. It appears the Applicant did not consider it relevant.</p>
46.	6.6 – Change to Character – Residual impact assessment (considering management measures) p31	<p>The SIA relies on various conclusions reached in the VIA. However, SBPS notes various flaws with the visual impact assessment.</p> <p>The EIS understates the visual impact of the proposal, either negligently or deliberately. As per SBPS 98, the Applicant states that the “two-storey scale [is consistent with] existing surrounding buildings including the existing Council building, former St Joseph's Convent, neighbouring primary school and Scout Facility”. This is wrong:</p>

		<ul style="list-style-type: none"> <li>- the existing Council building is single-storey;</li> <li>- the neighbouring primary school is single-storey;</li> <li>- the Scout Facility is single-storey;</li> <li>- St Joseph's Convent is two-storey. It is the only two storey building in the vicinity and small in scale and height. It is heritage listed, older brick construction dating from 1891. It is deeply set back from the road and surrounded by mature trees. It is in no way consistent in scale or style with the proposed construction.</li> </ul> <p>It is clear that the Applicant and its advisors are completely unfamiliar with the town. The Applicant should be invited to visit Bungendore to familiarise itself with the town prior to re-submitting the SIA. It's clear that it was not able to make a proper assessment of the impact of the change to character.</p>
47.	6.7 – Pedestrian safety and access p31	<p>The proposal presents significant danger to pedestrians and cyclists. Any mitigation measures will require the active support of Council, which has withdrawn its support for the proposal. In any event, the suggestion that "the proposal will improve the quality and safety of pedestrian paths" – if this occurs – is at best neutral to mitigate the impact of the development.</p> <p>As noted above, County Kids Club was unable to relocate to Bungendore Scout Hall following termination of its lease on Bungendore Community Centre in anticipation of the project, as pedestrian access following construction of the proposed high school was considered by the Commonwealth regulator to be too unsafe. The SIA should consider the impact of the closure of this local business.</p>
48.	6.7 – Pedestrian safety and access p31	<p>The SIA notes that the closure of Majara Street was "endorsed by Council".</p> <p>Council revoked the closure of the relevant section of Majara Street on 27 January 2022. It is no longer "endorsed by Council".</p> <p>Any such closure would in any event have been contrary to the Roads Act 1993. SBPS 74 notes the overwhelming community opposition to the closure of Majara Street, primarily because of the impact this will have on the community. The SIA fails to consider this.</p>
49.	6.7 – Pedestrian safety and access – Residual impact assessment (considering	<p>The project will cause a dramatic increase in pedestrian and traffic volumes around the site. These will require construction of footpaths not currently required. These are at best mitigants which detract from the rural character of the town, and the conclusion of a "neutral to low positive impact" cannot be sustained.</p>

	management measures) p32	The diversion of traffic onto Butmaroo Street, which is heavily used by pedestrians, children, dog-walkers and cyclists as a link between Elmslea and Bungendore town centre will have significant impact on those road users as well as residents. The street has no footpath and is unkerbed. The SIA does not consider this.
50.	6.8 – Traffic generation	<p>The conclusions in the SIA cannot be sustained. This refers to a “Transport Assessment” which considered “service levels” at 6 intersections. It did not consider the impact of increased traffic volumes on nearby streets or on the adjacent preschool and primary school.</p> <p>This is discussed in detail in SBPS 6, 34, 35 and particularly at 127 and 131. The authors of the Transport Assessment cited by the SIA noted that there were “major limitations” in the dataset made available to them to prepare their report; consequently its conclusions cannot be probative. Further, in ignoring the rural catchment, the EIS failed to consider that a higher proportion of senior students in rural areas are likely to drive to school, increasing traffic volumes and the demand for parking.</p> <p>Given the deficiencies in the Transport Assessment, Save Bungendore Park Inc prepared its own assessment, which is available here: <a href="https://drive.google.com/drive/folders/1ATNUepXJyet8N_QXDzMZ65jy04diVMyl">https://drive.google.com/drive/folders/1ATNUepXJyet8N_QXDzMZ65jy04diVMyl</a></p>
51.	7. – Conclusion	<p>Many conclusions are unsupported or no longer valid following design changes. In particular:</p> <ul style="list-style-type: none"> <li>• <b>Improved access to education</b> – there is little material benefit to the rural catchment which will account for a large proportion of the school catchment. Students from these areas will make up around half the student body and will still need to travel (in some cases greater distances due to zoning changes) to attend Bungendore High School;</li> <li>• <b>Access to open space and recreation facilities</b> – the impact has been dramatically understated. A large part of Bungendore Park and Bungendore Common will be permanently removed and access to much of the remainder severely limited. Alternative facilities are some distance and/or typically in poor condition (ie Warren Little Oval) and were not intended to replace Bungendore Park;</li> <li>• <b>Access to community infrastructure</b> – this part of the SIA is no longer applicable. There was no identified need to replace the Community Centre, which the valuation notes is “in average condition with no significant requirements for repairs being noted other than items which would normally be undertaken as part of regular repairs and maintenance.” There will be no material benefit from delivering a new facility, if this is even possible. As noted above, it is unlikely that the proposed site will offer sufficient space to provide an equivalent facility.</li> </ul>



		<ul style="list-style-type: none"> <li>• <b><i>Change to character</i></b> – as noted, the Visual Impact Assessment was seriously flawed.</li> <li>• <b><i>Pedestrian safety and access</i></b> – as noted, the impact on pedestrians using Butmaroo St was not considered. Further, safety concerns regarding pick-up and drop off, as well as bus access identified in particular in SBPS 128-131 were not considered. Revised plans which will include significant parking on both sides of Turallo Terrace will raise significant pedestrian safety concerns.</li> </ul>
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**Save Bungendore Park Inc.**

**9 October 2022**