

Lieutenant Colonel CF Cole, CSM

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 or Madam

**NEW HIGH SCHOOL IN BUNGENDORE
APPLICATION NO. 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, for the following reason(s):

- **Improper, opaque and parochial decision making process.**

The decision making process to arrive at the current SSD Application is flawed, opaque, and appears suspect because of the following concerns:

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.*'

- John Barilaro, member for Monaro, has announced that a new high school will be constructed in Bungendore, a rural community close to the ACT border, presumably to support his re-election chances in 2023.
- He has secured the cooperation of the NSW Dept of Education which, to deliver on its well-publicised acceptance of its responsibility and obligation to deliver a Bungendore High School, seems to be seeking the lowest cost solution to fast-track a flawed planning proposal and to construct the new school on a small building envelope in the heart of our town's heritage precinct apparently intended specifically to meet the re-election aspirations of the Deputy Premier of NSW.
- Mr Barilaro has also secured the cooperation of Queanbeyan Palerang Regional Council (QPRC) whose support for the proposal effectively abrogates its management responsibilities and obligations for the proper management of local roads, Crown land, Common land, public amenities in order to secure short term political and financial advantage. This advantage appears to arise from disposing of surplus council land and facilities at rock bottom prices (based on reluctant release of NSW valuations) to cover a looming annual deficit and contribute to a new \$74m vanity project which is its new council offices in Queanbeyan.
- Department of Education staff attended a community hub recently. The key messages delivered by the communications officer and the consultant project engineer were both deeply concerning and evidence of rushing for the cheapest sub-optimal solution in the shortest time to meet parochial concerns of all key stakeholders except for the present and future residents of Bungendore:
 - The communications officer advised us 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. This seems at odds with

generally applied reasonable planning processes for such a time critical project. Further evidence pointing to an electoral pact.

- The 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 consultant project engineer admitted that the single day of traffic surveys in Nov 20 supporting the proposal to build two story pre-fabricated buildings over what is currently a well-used road that forms part of the original village grid system of roads did not constitute an appropriate traffic study, sufficient to justify the closure of Majara Street especially considering that the survey was undertaken without any consideration for such a closure; a decision that was only made in April 21.
- The flawed planning process has been characterised by repeated, serial attempts by QPRC and the Dept of Education to avoid making any aspect of the decision-making process transparent and honest.
- Recent cooperation by the NSW Dept of Planning to release documents in response to an FOI 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 both the 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. The communications officer 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.
- **Inadequate and poorly considered site, and sub-optimal School that will destroy the green heart of Bungendore**

The proposed location of the high school is inappropriate on a number of levels and the negative impact on the Bungendore Community will be significant:

- 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. There is simply no scope for expansion if population growth imposes a higher rate of enrolment than 450 students. Except by building on the primary school ovals and the Mick Sherd Oval.
- Bungendore is a small town surrounded by wide expanses of private agricultural land, fenced by barbed wire and inaccessible to members of the Public. And yet the Dept of Education and QPRC, in league with Mr Barilaro intend that the very green centre of Bungendore be built over, concreted, fenced off and made inaccessible. The justification for this action, that a new sports hub will be built outside the township, separated from the population two very busy regional roads is deeply disturbing and ignores a number of key factors and issues.
- Bungendore Park is Crown land, gazetted in 1884 and dedicated for Public Recreation. It should not be at the disposal of parochial stakeholders who intend to bow to political expediences, artificial deadlines, fund alternative projects or foreshorten planning processes.
- Bungendore Common and destruction of the town's heritage precinct which will also be used for high school buildings is 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. Council must not be allowed to abrogate its management responsibilities to the detriment of the fabric of local inhabitants. Such action has a far wider implication for regional Australia, if Crown lands and public land can be disposed of so easily.

- 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. Its loss will be permanent and irreversible, blighting the lives of current and future residents
- 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.
- Permanent removal of well used and popular public amenities including the town's swimming pool which was part funded by the Community will be closed and levelled to enable the High School construction. There is no guarantee of any funding to replace the pool at an alternative site outside the Township and the poorest families will be disadvantaged by this decision. The High School proposal will require the destruction and removal of 123 or 70% of the Park's 175 mature trees and green canopy in an area of the country, designated by QPRC as a 'Heat Desert'.
- In *Crown Land 2031* published in May this year 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.
- 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 loss of the Park and its replacement by prefabricated two story buildings roundabouts and car and bus parking areas will damage the Township and blight its commercial and Heritage attractions.
- At 29,209 M2 or 2.9 Hectares, the proposed and sub-optimal High School site is far smaller than the minimum size (4 Hectares) set by the Dept of Education. Bungendore's significant population growth projected over the short to mid-term, out to 2036 is very likely to require additional building over what remains of the green space in Bungendore further damaging the lives and well-being of present and future residents of Bungendore.

I object most strongly to this SSDA.

Yours faithfully,

Clifford Frederick Cole, CSM
Lieutenant Colonel