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**Re submission- Bungendore High School Application no: SSD-14394209**1 message

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No donations made to political parties

**Objection to Bungendore High School Application no: SSD-14394209 - Submission**

**This submission lodges an objection to the design plan for the proposed high school complex and associated development on Bungendore Park, and associated public grounds.**

The development requires changes to zoning of public recreation lands and must meet specified criteria for development consent (ref: Identity of the zone: Lot 701 DP 1027107 RE1 Public Recreation RE1 Public Recreation - Palerang Local Environmental Plan 2014).

On review of the Exhibition documents which set out the assessments for the proposed development, my contention is that the current school plan:

- is poorly suited to the site, creating impractical shared school and public use amenities in an effort to maximise utility of a site too small for current and future needs
- with two storey buildings in modern materials will visually dominate this heritage green space and historic services precinct and so is inappropriate for the proposed location
- will deprive the community of the use of their historic green space for village events and activities, with an impact on the economic prosperity enjoyed by the town as a heritage village, as guaranteed in the Bungendore Structure Plan 2048, and, most importantly,
- that in collocating the school along the rail corridor and closing the Majura Street thoroughfare, the plan creates a transport, traffic and pedestrian bottleneck at the School's main entrance greatly increasing accident risk.

It must also be observed that the Council and Planning Authorities' management of this proposal has caused a great deal of distress in Bungendore, which to date has effectively accommodated diverse development within and outside the town centre with whole community benefit. Bungendore's rural town character can be preserved by responsible town planning, with larger infrastructure developments located outside the town centre as previously negotiated, in addition to retaining lowrise community facilities, playgrounds and the family friendly outdoor swimming pool currently enjoyed by young and old in the town.

The following covers some specific points of objection to this proposal.

**Assessment - 'future proofing' education**

The Exhibition documentation for the School states that the proposed development is designed as a 'stream 3 high school which will initially provide for approximately 450 students with core 4 facilities aimed to future proof demand forecasted to 2036'. (Appendix 23, Consultation report).

While the proposed school plan includes some welcome elements, such as the science and technology facilities, and dedicated arts and performance spaces, the need for a site large enough to accommodate evolving requirements and opportunities in future is limited. The design proposed is unsuitable in a number of ways for the site, including the risks associated with the crowding of the infrastructure against the rail corridor and the traffic bottle neck created at the school entrance (discussed further below). The height and scale of the design complex will occupy at least a third of the site, providing little capacity for future development without further expansion into school and shared greenspace, probably with demountable buildings.

In an attempt to maximise site usage, the design proposes repurposing of existing community facilities for school use and creation of a new community shared space within school grounds. This includes a library which I gather is to service both primary and high school students as well as the broader community. The proposed agricultural area, which co-opts the

community's dog off leash zone and subsumes the scout facilities, creates another shared zone for students and public. The proposal to share community and school facilities is as novel as it is risky.

A sad fact of contemporary life is that concerns for school property and student safety are now strictly enforced by school administrators. Given this, this aspect of the plan seems unrealistic. Do planners contemplate members of the public using these facilities during the day when students of mixed ages are accessing them? If so, there are considerable risks for teachers who will have a duty of care for these students. Further, how will the security of the school grounds be maintained during and especially after hours?

Proposals such as this suggest the degree of effort being made to minimise costs to council and to maximise site usage in a location which is simply not appropriate for a high school. As noted in consultations for the school, the site was previously dismissed by NSW planners as too small for a high school development. The site provides limited opportunities for innovation to meet future needs other than further site domination and loss of school and public greenspace and amenity in the historic town centre.

### **Assessment - Heritage preservation and village character**

Bungendore, so close to Canberra, is well placed for further growth and development. So far the town has managed to preserve its uniqueness as an historic town and rural community while capitalising on the residential, civil and business diversification offered by its location.

The Bungendore Structure Plan 2048 (November 2019) articulates the community's expectations for further development in Bungendore in clear terms, stating that:

- Any development is 'to allow heritage items to remain as dominant features in Bungendore because they are a key part of the town's country/heritage identity'.
- New buildings shall relate to the existing town character by having sympathetic forms and external materials.
- Development should retain its 'strong visual links to its surrounding natural landscapes'. (quoted Appendix 9, Social Impact Assessment)

Many of the design features proposed in this development application will not comply with this scheme. This however is not acknowledged in the planning assessment documents on the State Significant Development website. The Social Impact Assessment, for example, concludes that the potential visual impact of the proposed school on the heritage aspect of the site will be 'minimal' stating that:

The potential change to the visual character of Bungendore and the surrounding area is expected to have a low impact on the community. The Visual Impact Assessment considers the proposal is aligned to the scale of the local context and does not adversely impact views or overshadow surrounding local landmarks and neighbouring residents. (p. 31)

The assessment refers to use of fibreboard sheeting and metal materials as sympathetic to the character of buildings in the park vicinity, and maintains that the distances and set back of the building on the site and low lighting support is this conclusion.

While noting that the Park itself is not a formally designated heritage area, the precinct itself is acknowledged in the Social Assessment as the historic services hub of Bungendore, with school of arts, heritage post office, police and railway station, Bungendore school building and historic church in the development precinct. The design complex will occupy up to a third of the site, with further expansion planned. Irrespective of the assessment in the Architectural design report that the two story scale will not be out of character in the heritage precinct (p. 14) a high school complex will no doubt distract from the visual impact of the historic buildings contiguous to the park, and the vista up from Gibraltar street shops and hospitality area to the Memorial and across the greenspace.

Finally, the encroachment of the school complex on this community owned recreational greenspace impacts on the natural integrity of the park area, with 76 trees marked for removal to accommodate site development. (Social Impact Assessment, p. 9)

### **Assessment - Loss of whole community amenity and impacts on business**

The Social Assessment document in my view underplays the strong degree of concern about the loss of amenity to the community as a whole by this development by stating: 'Most survey respondents (74%) felt that the site was an appropriate location for the school. However there have been some concerns within the community about the location of the site and the potential impacts to existing social infrastructure and the amenity of the town.'

The results of a limited community engagement survey (710 individuals, Appendix 23, Consultation Outcomes Report, p. 6) does not discount the degree of community conflict and distress this proposal has generated in Bungendore, which has to date preserved its heritage integrity with a central greenspace.

The loss of the Mick Sherd Oval to the school grounds on a fenced site is widely regarded as a short term and second rate solution by those who have long attachment to the community, and other newcomers attracted to the town's rural lifestyle. This includes a large proportion of the commuters who leave Bungendore for work everyday.

These commuters may, as I did as a resident in Hoskinstown, ferry kids to school in Canberra daily and be pleased to have a high school in Bungendore. Nevertheless, whatever solution is devised to make sharing of the school grounds more feasible (a low fence is now proposed in response to community objections about high fences enclosing the area), the school grounds will not be available for other community and sporting events, and for the produce and arts markets that have made the Mick Sherd Oval and park the recreational core of Bungendore region for decades.

This loss of amenity is significant, the town will never again have a central green space for shared recreation and social relaxation; Bungendore will lose its heritage credentials and country town identity.

### **Assessment - Community safety and traffic risk**

The proposed high school and associated buildings are to be constructed along the rail corridor, and require closure of part of Majura Street which runs north to south and parallel to the rail line to the historic Bungendore railway station. The new entrance to the school will be at the point where Majura street formerly intersected with Gibraltar Street, a main thoroughfare to the coast, and close to the entry point for the railway station slip road. The traffic risk to students is intended to be reduced by including a walkway across Gibraltar Street to a new bus area with a roundabout to improve traffic flow. (Refer Fig.1.1, Proposed Site Plan, Appendix 6a, Transport Assessment).

Unsurprisingly this plan sounded to Bungendore residents like a traffic accident waiting to happen. The Social Impact Assessment for the proposal advised that: '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', (p. 19) It accordingly rated traffic impacts as having a 'moderate to high impact' on residents. The Transport Assessment of the arrangement, however concluded there was 'sufficient road capacity' to accommodate the projected traffic movements from the school, with any 'low impact' on the community reduced by continued updates on traffic changes and releasing the findings of the final TA'. (Traffic Generation, Social Impact Assessment, p. 35)

My contention is that this evaluation is not consistent with statistics provided in the Transport Assessment which recognise that the majority of Bungendore residents using the school work or live outside of Bungendore, and the expectation that the majority of school staff will also travel from outside. (Transport Assessment, p. 26) The student drop off point is planned for further along Majura Street but the assessment fails to recognise that there will be a convergence of cars at peak pick up/drop off times at the school entrance where an exodus of students to the bus area across a busy thoroughfare (Gibraltar Street) will inevitably heighten the risk of accident considerably. Further, the new arrangements will further divert most traffic and parking into Butmaroo street, currently a quiet residential street, with directions to park on unformed street verges.

That overall risk of the plan to pedestrians and motorists is heightened by its close proximity of the Bungendore railway station to the Majura, Gibraltar Street intersection. The short term solutions proposed to avoid congestion around the station underline the impracticality of the site for a school. The Transport Assessment notes that the last train from Sydney, arriving daily at 3.20 pm, could be delayed so its arrival doesn't coincide with the end of the school day! At this juncture in time, with pressures to reduce CO2 emissions and create green transport solutions, it is quite feasible that railway transport will be more heavily relied on in future. The historic nature of Bungendore and its Railway may well add to the attraction of rail tourism from Sydney, a growth industry for Bungendore, also exacerbating traffic concentration right outside the school.

Most important, the exhibition documentation states explicitly that the School plan will evolve in accordance with the NSW Dept of Planning 'Development near Railway Corridors and Busy Roads interim Guidelines' (2008), Oddly this is not a hot-linked document in the assessment material. These Guidelines explicitly advise against the siting of schools and childcare centres in close proximity to busy roads and rail lines, directing that schools must be built in low traffic areas 'to reduce the conflict between pedestrian access, drop off areas and high traffic volume'.

The guidelines also warn of acoustic distraction near railway lines, citing the high sensitivity of young people to noise, the potential adverse impacts on air quality, and also of electromagnetic impacts for students in structures made of metal near railway sites (Guidelines, p. 9) Despite commitments, the current Transport Assessment fails to reference the Guidelines other than for acoustic impacts, with an acoustic assessment to be undertaken later in the planning process (p. 23)

In addition to the risks already set out in this section, the recent evaluation of the rail corridor near Majura Street has indicated potentially high levels of lead exposure around the railway corridor (NSW Planning, Detection of Soil Contaminants, September 2021). This supports a strong objection to the proposed school design proceeding further at this site, which requires more rigorous evaluation.

### **Conclusion**

Naturally in a town with a long history like Bungendore, change can be contentious. To date, however, consultation and conciliation has achieved some acceptable solutions. Notably, new residential subdivisions have been established outside of the town centre precinct, in keeping with the Bungendore Structure Plan requirement that heritage features and natural vistas remain dominant. Adherence to this approach has made Bungendore a dynamic place, a new town with an old heart, preserving the town's unique heritage character and ensuring it remains a key attraction for nearby Canberrans and other visitors.

This proposal for to build a two storey high school complex on the green heart of the Majura/ Gibraltar Street Heritage precinct has however driven a wedge into the Bungendore community. The NSW Government has considered numerous sites outside of the town centre, including an offer made to a rural property owner contiguous to the town in the past.

Suddenly, however, we find that the school is to be built on a site previously dismissed by government assessments as too small for a high school, with blandishments made by the former Deputy Premier to residents with school age children that this is the 'only option' for the school to be finalised by the 2023 (and the next State Election).

This plan, with adaptations, could be better deployed on a more suitable site contiguous to Bungendore, such as the one previously selected on the edge of Bungendore town, and near the housing developments. The addition of cycling lanes and walkways will make Bungendore what it should be, a community built for people with an exciting and different future than that of a dormitory suburb of Canberra.

L A Slattery 16 October 2021