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Bungendore NSW 2621

18th October 2021

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

FORMAL OBJECTION to SSDA-14394209

Dear Sir or Madam,

NEW HIGH SCHOOL IN BUNGENDORE
APPLICATION NO. SSD-14394209

I refer to the above state-significant development application.

I strongly object to the “Statement of Heritage Impact and Archaeological Assessment”, “The Road Closure” and “The Transport Assessment” for the following reasons:

The Heritage Impact and Archaeological Assessment completely dismisses the Bungendore Park and Common as having no heritage value whatsoever to the Village of Bungendore and its community. The author of this report has either not referred to the brief or is writing in order to support the building of the high school on the park. This report is inadequate at best! The only mention in the reports that recognises that the Bungendore Park as Crown land DEDICATED for the purpose of public recreation, is that the Department of Education is attempting to negotiate legal avenues to acquire the Park.

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6. Impacts:

“Bungendore Park, although located within the curtilage of the Soldiers Memorial listing, is not considered a significant heritage item. Bungendore Common is simply unutilised open space. There are no significant trees, views, archaeology or features in either heritage item or within the entirety of the study area. No built heritage will be demolished, removed, changed or impacted directly or indirectly. No significant views

have been identified or will be impacted. No historical or Aboriginal archaeological objects or places will be impacted by the proposal.”

Bungendore Park and Majara Street form part of the original town grid, laid out by preeminent Colonial Surveyor James Larmer in 1837. There are very few public places in New South Wales, let alone Australia, with such a long European history. Its size and shape have not changed since and is a town square 200m x 200m. The Park was gazetted in 1884 and is Crown Land DEDICATED for the purpose of public recreation and was proclaimed in 1886. The Park was managed by community Trustees until it was given over to the care of the former Yarrowlumla Shire Council on 7 March 1962.

The common is over 100 years old and was managed by trustees until they wrote to the former Yarrowlumla Shire Council asking them to safeguard it for long term. Council promised to preserve it as a recreational reserve. The common is heritage protected due to its historic and cultural and social significance.

29 May 1981

Gazettal Notice:

“337. TRUSTEES BUNGENDORE COMMON (p1/1) (No. 19 on precis) : Advising that they have found that with rising costs and falling returns they are no longer able to administer the common in the manner required to keep it at a standard considered by them to be desirable and they believe that the best course of action to safeguard the long term viability of the Town Common as a recreational asset to be used by the people of the town and district would be for Council to administer it as a Recreational Reserve. It was resolved that the Trustees of the Bungendore Common and the Department of Lands be advised that Council would be prepared to take over the care, control and management of the area as a Recreational Reserve and at the same time protect the levee bank along the creek which was built by council some years ago.”

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2.2 Heritage Context

The items listed in the Palerang LEP 2014 are based on the original Bungendore Heritage Study prepared by David Scobie in 1982 and as it is now 39 years old. The draft Bungendore Heritage Study 2018 does not include Bungendore Park or Bungendore Common as heritage items as it did not assess memorials, fountains, or trees. The listings are therefore somewhat unclear (see Section 3).

The former Yarrowlumla Shire Council commissioned David Scobie, a heritage architect, to prepare the definitive heritage assessment of Bungendore in 1982. He recognized the importance of the town’s “traditional town park” as 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 recognized 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. This vista and the view to Gibraltar Hill will be obscured by the multistorey, prefabricated, pretend-to-fit-in school building.

Web site profile on David Scobie: “David Scobie is the practice principal, he has in excess of 30 years' experience as a Heritage Architect, Architect and Planner in Australia and Europe, with special skills in construction and heritage projects for the government and commercial sectors.

David is currently the Heritage Advisor for a number of Councils in the Central west of New South Wales.”

The Palerang Council Heritage Advisory Committee prepared a conservation planning strategy in 2010. The committee noted the importance of Bungendore as an intact, early 19th century town. It found that ‘the relative intactness of its early buildings and layout allows Bungendore to demonstrate the typical attributes of a late 19th century service village with representative examples of residential, commercial, retail, rural, educational, and religious buildings, parks and reserves.”

The proposed school and associated road closures are the first major change to this “intact” layout since the construction of the railway line in 1885.

“The Bungendore Structure Plan identifies Bungendore Park as the primary recreation facility for the town”

“The Bungendore Structure Plan 2048 identifies Bungendore as a rural town with strong visual links to its surrounding natural landscapes. Consultation with the community as part of Council’s Community Strategic Plan indicates that the community wants to maintain the current village feel and lifestyle of Bungendore. This sentiment is embedded in the LSPS 2040 vision for Bungendore, which aims for the suburb to be a “vibrant town with a historic village character” (pg.40). Preserving the rural character and lifestyle of Bungendore is therefore a key priority for the community. Given this importance, the Bungendore Structure Plan 2048 provides development principles to help respond to growth pressures in a way that reflects the desired future character of the suburb. Principles which are relevant to this proposal include: ▪ ‘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. ▪ The historic grid street pattern is retained and where practical a grid pattern is used in new development. ▪ New buildings shall relate to the existing town character by having sympathetic forms and external materials. ▪ Maintain the landscaped setting of Bungendore which includes mature trees and shrubs, grassed verges and gardens, all of which combine the exotic and native species, and where street trees are predominately deciduous species. ▪ The Common and other green spaces are

preserved, improved and extended to allow for walking, cycling, dog walking, horse riding etc. connections through the town to recreation spaces’”

A List of Bungendore’s heritage buildings which are on the park or in close vicinity:

1. Magnificent, mature trees descended from Gallipoli’s Lone Pine, which the state plans to chop down.
2. The Soldier’s Memorial (erected 1922). Its arched design is one of the least common memorial forms in Australia.
3. The 1847 Old Stables on Butmaroo Street – the oldest building in Bungendore and is currently being restored was used for Cobb and Co horses.
4. Royal Hotel, Turallo Terrace, from 1848 built for a Mr Byrne.
5. The present Royal Hotel, Gibraltar Street, 1882.
6. The headmaster’s cottage in Gibraltar Street from 1860, in Primary School grounds. Now the school office.
7. Police residence, 1902
8. The original 1864 Court House in Gibraltar Street, still in use as Police Station.
9. St Phillips Anglican Church in Gibraltar Street, from 1864, with its original Victorian Free Gothic architecture and mature gardens.
10. Anglican Rectory, 1924
11. Anglican Hall, 1916
12. St Mary’s Catholic Church, 1862
13. Birchfield, 1877
14. The Bungendore Railway Precinct from 1885. Which is recognized as having State-significant heritage importance, along with the original Stationmaster’s and Gatekeeper’s cottages. The entire precinct will be dramatically compromised by the State Government’s development plans.
15. The School of Arts, 1888.
16. The former convent, 1886, with its strong connections to Saint Mary McKillop.
17. Preschool, formally Catholic school, 1925
18. The Post Office, 1882.
19. Unmarked grave.
20. Historic cottages dotted around the park.

Note below from the Heritage advisors to DoE:

“All of the items in the vicinity of the study area are locally significant for historic and aesthetic values and make a strong contribution to Bungendore’s historic character and local streetscapes” but despite this, the Statement of Heritage Impact concluded that:

“No heritage items in the vicinity will be directly or indirectly impacted by the works.... The heritage impact of the new development is considered negligible.”

How does building multiple, large 2-storey prefabricated concrete buildings in the middle of this heritage precinct have “negligible impact”?

As recently as 2010, the Palerang Council Heritage Advisory Committee requested Palerang Council to adopt a heritage Conservation Plan for Bungendore which identified several heritage precincts. Bungendore Park was one of those precincts. The plan was never adopted; therefore Bungendore Park precinct doesn’t have the heritage protection that it deserves.

The Park has played a huge role in the culture and life of the town ever since it was dedicated in 1884 and today is still utilised by local families. It is well placed for tourists and as most of the businesses in town rely on tourism to make themselves viable this park is vitally important. The Park has hosted the Bungendore Tiger’s rugby League team since 1908 and is used by exercise service providers every day.

The closure of part Majara Street will detrimentally impact on the heritage Bungendore Park.

As notified 3rd February by QPRC

“Notification to Partially Close a Council Public Road.” QPRC

“In October 2020, Queanbeyan-Palerang Regional Council (‘Council’) accepted a final proposal from the NSW Department of education for the construction of a high school in Bungendore.

The high school will be constructed within the Majara/Gibraltar Street Precinct. To enable this, Council is proposing to partially close two sections of public road near your properties. In accordance with the proposal accepted by Council at its meeting on 28 October 2020, Council proposes to close the following sections of public road.”

In the above notice sent out, it explicitly says the road closure is to enable the high school to be constructed Yet in the below extract from Council minutes many objections were discounted because the high school was mentioned. Councillors were also advised to disregard the high school when they cast their vote.

Extract from Council Minutes on 28 April 2021

“Community consultation is an important part of the road closure process and all submissions have been documented for the consideration of councillors. Council received 169 submissions through this process, however, the majority are not specific to the road closure itself and instead focus on the DoE’s high school project. This is an important differentiation as concerns

raised should instead be raised and addressed when the DoE undertake their development application process.”

This is pure manipulation.

About 5th March, two councillors who voted against the road closure, one intended to put a motion to the council meeting on the 10th March, “to make the sale of the land to the Department of Education contingent on the Development Application for the high school being approved.”

On 10th March I received an email from QPRC

“Thanks for your email. Since this has arrived, we have been informed that the Notice of Motion will now be transferred to our meeting on 24th March”

On 24th March - Please see attached document “Minutes 24th March”

Recently we received FOI documents which I have attached:

“Email and Media Release from SINSW to QPRC”

This attachment refers to an email 10th March from SINSW that QPRC are holding a second vote on whether to close Majara Street. The SINSW response is heavy handed and appears to be blackmailing Council. Did SINSW effectively force the motion to be withdrawn? Is SINSW riding rough shod over our Councillors? The dealings between QPRC staff, Department of Education and SINSW appear secretive and suspicious which makes me think it is something that needs to be referred to ICAC.

Building a high school on part of Majara Street is a major concern, both for heritage and through-road traffic reasons and to think that the transport study was conducted without considering this road closure.

Majara Street handles much of the traffic between Elmslea, Bungendore Public School and the Kings highway and the section of Majara Street proposed to be closed carries an estimated 1,700 vehicles a day away from residential streets. If this road closes, then all its traffic will be pushed into streets that are not built to carry this volume of traffic.

There is also a major housing development being constructed north of the park and most of that traffic will be further directed into this area.

It will be traffic mayhem mixed with preschoolers, primary school kids and now proposed high school kids some of whom will be driving themselves to school.

This building sitting on the road will stop the flow through system, school drop off and pick up will become a congested nightmare and create a real hazard for pedestrians, the majority of which will be children. Many primary school children ride scooters or bikes to school, without adult supervision. The current footpaths and pedestrian crossings allow this to happen quite safely. The resulting closure of Majara Street and the construction of a high school directly over the current footpath and the high school takeover of Mick Sherd Oval, will obstruct this safe passage for young students and they will now have to negotiate much busier and dangerous traffic congestion along with the possible added pressure of bemused high school students. They will have to either go around the park or negotiate through it and then deal with a busy bus interchange and “kiss and drop off” points on Gibraltar Street before reaching the primary school.

The Transport Assessment

The consultant said “The catchment analysis comprised the locations of 147 high school student residences, based upon information provided ... by SINSW. It should be noted that the depersonalised data that was provided only captured students who attended public schools and who live within the Bungendore Town centre and its surrounds. This is a major limitation to the assessment....”

The transport assessment considered 147 students who live within the village and therefore concluded that “92% of kids attending the new school will be in walking or riding distance to the new school”.

The bureaucrats in Sydney seem to have no knowledge of life in rural NSW.

They are planning on building a school in a rural town and have no concept of how far children in rural areas need to travel to attend school.

There are surrounding villages without high schools but **do** have primary schools therefore a high school built in Bungendore needs to accommodate many students from many primary schools – Sutton, Gundaroo, Captains Flat, Hoskinstown and, densely populated rural areas such as Wamboin and Bywong. These students must use school buses or private cars and in fact that will be the norm for these students no matter where they enrol in school.

We are not a city school with available public transport.

The assessment excludes children attending private schools. Why!

Often children are attending private schools in the ACT because most ACT government high schools are closed to students from NSW bordering towns and the only option is to attend a private school.

The parking spaces to be provided will be totally inadequate and therefore pushing teachers and students to park further into residential areas. Very few streets in this area are kerbed and guttered.

I implore Planning New South Wales to reject this application outright and insist that the Department of Education return to the originally identified site on Tarago road.

I have not, and no associate of mine has made any political donation to any person in the two years preceding this submission.

Yours faithfully

Maureen Elgood