

Mark Lintermans  
[REDACTED]  
Bungendore, NSW 2621  
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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 **object** to the proposal, for the following reason(s):

(1) Traffic considerations during construction

(i) **Construction traffic management**

“ The Development Application (DA) states: During school peak pick up and drop off periods, heavy vehicle movements will be restricted to Turallo Terrace only, to provide improved safety to Bungendore

Public School students on Gibraltar Street and Majara Street.”

Turallo Terrace is a residential street, and as one of those residents, I object to having to bear the brunt of heavy vehicle movements during peak pick up and drop off periods. There are no specific times given for what peak periods are’ so who will make this call? Peak periods can extend over two hours in the morning and similarly in the afternoon and expecting one residential street to suffer this level of impact is unreasonable. There is a pre-school situated on Turallo Terrace and many students who walk across Bungendore Park to walk home via the path opposite Butmaroo St, or use the path along McCusker Drive: why are these students (or residents) of lesser safety concern?

If safety is a concern, then restrict heavy vehicle movements along Turallo Terrace, Majara St and Gibraltar St.

(ii) **Construction Parking**

The DA states “Approximately 100 light vehicles are expected to access the construction compound. The existing QPRC building parking will be available to workers, with approximately 50 vehicles required to find alternative parking arrangements. These may include informal parking on Turallo Terrace and Butmaroo Street, as well as other designated parking areas in proximity to the site.”

This text about the number of vehicles having to find alternative parking is totally misleading, as it does not consider the “Approximately 35 QPRC staff may need to be accommodated in the Council building to be retained for the duration of the works and into occupation”. So the number of excess vehicles is likely far higher than the 50 mentioned. Again, residential streets (Turallo Terrace and Butmaroo St) are being expected to bear the

brunt of construction works “informal parking” is a euphemism for workers parking haphazardly across nature strips, driveway entrances or on road verges. Nature strips will quickly become mud piles during winter. The disruption to residents is likely to be considerable as workers arrive and proceed to unload tools and equipment for a 7 am start (Monday to Friday) and an 8:00 am start (Saturdays). The transfer of residential streets into construction parking is not tenable, and alternative “informal parking” away from residential areas needs to be planned.

## **(2) Traffic considerations following construction**

The traffic study is inadequate, being based on data from a single day collected over only a 3-hour period (total). This inadequate data collected over the extremely limited time periods of 8am-9:30am and 2:30pm-4pm is then somehow extrapolated to derive an assessment of “traffic network peak hours”. Given that data was not collected for multiple hours during the peak morning and afternoon periods the designation of peak periods is fanciful. As the Department of Education repeatedly refused to release the results or its methodology of the Traffic Survey to the Bungendore Community for >10 months from when it was collected, the Save Bungendore Park Group (SBPG) conducted its own traffic survey over multiple hours on 24 May 2021. Data was collected between 06:00 and 09:30 in the morning peak, and between 14:30 and 17:30 in the afternoon peak (more than double the amount of time the Department of Education (DoE) study employed). The SBPG traffic study demonstrates that the peak extends considerably longer than that shown in the DA, with high traffic numbers along Majara St commencing prior to 8:00 am (particularly from the south) and in the afternoon there were actually two distinct and virtually equal peak periods between 14:30 and 15:30 and again between 16:30 and 17:30.

When the traffic study was finally made public as part of the DA, it is apparent that it is almost solely focussed on time delays at intersections and contains little-to-no material on the impacts of the increased traffic to residents (noise, loss of amenity, safety concerns). For example, see Table 9.1 of the DA: the only traffic issue in the risk assessment is about intersection capacity (nothing about residential amenity or safety). The closure of Majara Street will effectively funnel southbound traffic from the residential area of Elmslea (and the currently being developed North Elmslea) along the residential streets of Turallo Terrace and Butmaroo Street. Previously, much of this traffic used the non-residential Majara Street to either connect with Kings Highway or the non-residential Gibraltar Street. This Majara Street traffic will now be funnelled past the Bungendore Pre School, with obvious safety concerns for pre-schoolers, plus noise and amenity concerns for Turallo Terrace and Butmaroo St residents. The pedestrian path that extends from Turallo Terrace/Bungendore Park (opposite Butmaroo St) to the north across the Common to Elmslea is a popular pathway for students, residents, kids playing sport or recreating on weekends and particularly children on bicycles. Increased traffic down Turallo Terrace (7 days a week because Majara St will be closed) raises obvious safety concerns at this crossing. When the safety issue for the Pre-School and pedestrians using the path to the Common was raised by residents with DoE and Queanbeyan Palerang Regional Council, we were told that traffic calming measures would be part of the DA. These safety concerns are not raised or considered in the DA at all. This is an obvious deficiency. The residential amenity issues (noise, increased traffic volume) are not raised or considered in the DA at all. This is an obvious deficiency.

A substantial proportion of the traffic diverted from southbound Majara Street will now traverse the length of residential Turallo Terrace to come to the T junction of Turallo Terrace with Molonglo St/Tarago Rd. Tarago Road is used by large numbers of heavy vehicles (sand-trucks: truck and dog) travelling to and from the commercial Lake George sand extraction pits, with this sand-truck traffic starting from 5:30 am. Vehicles travelling down Turallo Terrace to the T intersection have a heavily obscured line of sight to the north as a consequence of the raised bridge over Turallo Ck, and the curve of the road which prevents views of oncoming traffic. This intersection is a traffic accident waiting to happen, and it is the domestic vehicles

using Turallo Terrace that are likely to fare worse in any interaction with a laden sand truck. When these safety issues were raised by residents with DoE and Queanbeyan Palerang Regional Council, we were told “we have done what we are required” in relation to the process requirements of the proposed closing of Majara Street. The safety implications of directing additional traffic down Turallo Terrace to the line-of-sight-obscured T junction is not raised or considered in the DA at all. This is an obvious deficiency.

When traffic issues (volume, speed of vehicles) were repeatedly raised at the DoE Information Hubs, residents were assured that traffic calming measures would all be covered in DA. Residents canvassed whether chicanes, speed humps, lower speed zones might be implemented as traffic calming measures: we were told it will all be part of the DA. They are not and this is a clear deficiency. The traffic study (Appendix 6a) includes the provision of a pedestrian crossing across Turallo Terrace “to support the safe movement of pedestrians between the school and the agricultural plot.” Good to know that apparently Pre-Schoolers and residents are apparently not worthy of mention. Apparently, the safety of the students accessing the Agricultural Plot is also not much of a priority either, as the Traffic study (Appendix 6a) states “Of the proposed upgrades identified above the highest importance should be applied to pedestrian crossings on Gibraltar Street, the shared path on Majara Street and the footpaths on Butmaroo Street”: the proposed pedestrian crossing across Turallo Terrace does not rate a mention.

In conclusion, the traffic study is severely deficient on a number of fronts, and the supposed traffic calming measures that residents were continually promised are worse than deficient, they are non-existent.

## (2) Community engagement

In the letter from Department of Planning Industry & Environment (DPIE) to DoE re the SEARs it states:

“The Department [Planning Industry & Environment] wishes to emphasise the importance of **effective and genuine community consultation**. A **comprehensive open and transparent community consultation engagement process** must be undertaken during the preparation of the EIS. This process must **ensure that the community is provided with a good understanding of what is proposed, description of any potential impacts and they are actively engaged in issues of concern to them** [my emphasis added].

Fantastic sentiment, clear emphasis, but I must report that DoE did not satisfy these requirements. The community consultation and information dissemination has been characterised by secrecy, misinformation and ‘stonewalling’ and I believe has not been conducted in good faith. This applies not only to DoE but also to QPRC. The supposed DoE “Targeted consultation’ with community special interest groups prior to the announcement of the Bungendore park site in August 2020 were conducted in secret, with the principals of community groups contacted told not to contact their membership in an attempt to preserve the secrecy of the process. So in fact the consultation cannot be considered representative of the groups, only the few people contacted.

Similarly the claims of ‘due diligence’ that “DoE undertook an assessment of over 1,000 hectares of land in and around Bungendore. Each site was assessed based on its suitability to support the needs of the project.” And “Following the due diligence process, the Majara/Gibraltar Streets precinct was identified as the most suitable location” are misinformation in that a previous investigation by DPIE had identified a much larger suitable site with none of the restrictions (size, need to close roads, Crown Land Dedications, etc) that the Bungendore Park site has. The DoE did not inform the community of this alternative site, and in fact objected to the DPIE releasing information about this alternative site under FOI requests.

Statements/promises made at Community Information Hubs have not been honoured (see above re traffic calming, and there are numerous other instances (e.g. supposed minimal tree loss/removals as part of the High School build; alternative traffic arrangements behind the QPRC council buildings, etc). It has been a constantly moving feast which has been almost impossible for the Bungendore Community to follow. The misinformation constantly pushed about 'majority community support' has refused to acknowledge or address many community concerns about the project. The DA continues this spin by highlighting that from the initial online survey "79% of survey respondents expressed positive sentiments about building a new high school in Bungendore" when this survey pointedly did not seek views of the community re the suitability of the site. Then at the first Community Hub in September 2020 when the site was finally the reported highlight is "74% of survey respondents felt that the site was an appropriate location for the school: with this 74% representing 54 people. The information hub on Tuesday 11 May 2021 was a debacle: an armed security presence was totally intimidating, and obviously aware that community sentiment was now firmly swinging against the site, conveniently no statistics were gathered about community support were gathered. This bias is also evident in that the 'community' representative on the Project Reference Group (PRG) was selected from the pro-high school lobby group: There was no public call for expressions of interest for this community representative position.

The DA acknowledges community concerns:

- "...over the use of Mick Sherd Oval and Bungendore Park for school use and potential loss of public access;
- Questions raised around how safe pedestrian and traffic access would be managed and any potential infrastructure upgrades;
- Questions raised on impacts to existing community facilities and replacement as a result of the proposal;
- Concern around the lack of consultation around the site selection process and the feasibility of the site to accommodate a new school;

The DA then claims that "SINSW has sought to address these concerns through the release of public information about the due diligence process and amendments to the design." This is selective reporting in that the potential loss of public access has not altered (the oval is still for exclusive school use during school hours); the impacts of traffic on residential amenity and safety have not been addressed (see earlier comments); the "feasibility of the site to accommodate a new school" has been to implement the blinkered approach of refusing to acknowledge there are any issues with squeezing a high school onto a small site; refusing to acknowledge that to achieve this site feasibility has required the closing of required public road, the destruction of a 100+ year dedication of Crown Land for public recreation; the demolition of the centrally-located community swimming pool, the destruction of the majority of mature trees in the only centrally-located heritage park, etc. etc.

The DoE has actively stonewalled/obstructed the release of government information through FOI requests that might have satisfied the emphasis in the DPI letter to "ensure that the community is provided with a good understanding of what is proposed, description of any potential impacts and they are actively engaged in issues of concern to them".

The classic example of this stonewalling is the refusal to release/ almost total redaction of the Traffic Report under FOI because

The information on pages 8, 9-75, 77-78 and 82-157 is business information belonging to a third party, GHD. This information has a commercial value to GHD as it concerns their methodology. Competition in this industry is fierce and releasing information that reveals a business's methodology could have a very significant adverse effect on the third parties' future business dealings, as other businesses may use this methodology when competing for business with GHD. It would also place the department in an awkward situation, as companies may shy away from competing in future tender processes, as they fear their business information may be released to applicants who apply for such information under the GIPA Act.

Releasing the records under this application, could therefore limit the amount of information the department receives from contractors in the future, as they would be reluctant to provide details that may then be made available to members of the public.

This is for a government-funded traffic report that was specifically required to be for public release! So more than 140 pages of this report were totally redacted because it might reveal the commercial methodology of how a company does a traffic study (and I thought they just counted vehicles!). This example is indicative of the absolute reluctance to disclose information to the Bungendore community (there have been numerous FOI requests refused, almost totally redacted, or delayed), and I believe highlights the absence of 'good faith' in the community consultation and provision of information.

### (3) Lead contamination

The issue of lead contamination has only just become apparent for land adjacent to the railway. As a heavy metal with considerable public health concerns, this is a serious issue. The land to the east of Majara St is all adjacent to the railway and is designed to be part of the high school, the approval of the DA should not proceed until this lead issues is resolved. Relevant to this issue of lead contamination, is the question of whether the rea has been assessed for asbestos contamination. Asbestos was used in brake mechanisms on trains and is a common issue in sections of lines where trains have to apply brakes to slow down. The proposed high school site is directly adjacent to the Bungendore Station (where trains have to brake to come to a halt). Testing for asbestos is required to satisfy the community that there is no contamination of the high school site.

I would be happy to attend/participate in a Public Hearing on this matter.

I have not, and no associate of mine, has made any political donation to any person in the 2 years preceding this submission.

Yours faithfully,

Mark Lintermans