

BHS-SSDA – Objection BROOKSMA ebm 9pp 17Oct2021.pdf

SSDA-14394209 --- BUNGENDORE HIGH SCHOOL

FORMAL OBJECTION - 11 October 2021

Introduction

Although my home is now Queanbeyan, my sister is a long-term resident of Bungendore, and while she was away 2017-2020 my husband and I lived in her home there. It is located one block from the railway crossing, so I know this area of Bungendore very well. While I applaud the idea of a new Bungendore High School (BHS) in an appropriate location, I totally object to the proposed Majara St siting.

The problems involved re consolidating into a single Majara St are simply so many and so systemic that not even the most wonderful High School building in the world could compensate for the irretrievable heritage damage involved, the access and activity loss, and overall deprivation of ongoing roadway and century-old community assets.

As put together by Schools Infrastructure (SINSW) this State Significant Development Application (SSDA) is a terminally convoluted plan, full of over-hyped adjectives hiding ugly land-grabs and either disdain or disrespect for almost everything from heritage to commonsense, from a magnificent marble Memorial to

But easily the most OBJECTIONABLE aspect of this SSDA is that it's there at all.

Why? Because, quite simply, this BHS doesn't qualify with a fundamental Dept of Education (DoE) requirement – site-size. Instead of the **4 ha** “standard” for a rural/regional Secondary School of up to 4000 students, total area of this proposal is **2.9 ha** – a **27.5 %** deficiency. *See attached map-chart for the size of each area.*

Another DoE standard is for “clarity of ownership” – the land must be a ONE site, either a single lot or able to be consolidated.

For this BHS, the selected site is a motley of lots – five owned by Queanbeyan Palerang Regional Council (QPRC) and the remainder in two sites, both Crown Land (CL) and a council-managed by QPRC in the Crown Land Management Act 2016 (CLMA).

The first site is the 40,000 m2 BUNGENDORE PARK – D-100193, and the second is TURALLO CREEK RESERVE -- R94996 also known as the Bungendore Common. These sites are opposite each other, but separated by a public road, namely Turallo Terrace. The SSDA proposes to subdivide a certain section of each, and the part taken from the Park will be added to the QPRC land, which notably includes a section Majara St, a council-owned roadway which will need to be closed.

OBJECTION 1 – BUNGENDORE PARK

My first objection concerns any subdivision or diminishment whatsoever of Bungendore Park. (the Park). This is dedicated Crown Land, and has been so since 1884. It is, literally a genuine “Town Square”, being 200m x 200m of open access community land set aside for “the public purpose of public recreation”.

As shown in the architectural drawings in Appendix 3 of the Environmental Impact Statement (EIS), this SSDA proposes to utilise a large L-shaped section – not only taking 27.5% of the overall Park land area, but doing so in a way which totally disintegrates the 200m x 200m “Square”. This regularity of shape is a fundamental of the Park’s character - an inextricable, integral aspect in the heritage of this Park.

A lopsided rectangle is NOT a “Square”.

I am appalled that the heritage study in Appendix 8 of the SSDA seems oblivious to this basic fact, clearly indicated on old maps – even one in Appendix 18, the Contamination Report.. To me this is, in and of itself, grounds for objection – namely, failure to even acknowledge the existence of Bungendore Park as a “Town Square”, much less give full significance due to this remarkable, rare, and still intact heritage attribute.

I therefore object to any credence being given to this singularly facile so-called heritage “assessment”. And I say this as someone with over 30 years’ in-depth involvement with heritage matters, including an official 2010 Award as NSW “Heritage Hero”.

Still looking at Bungendore Park and the size/shape of the proposed subdivision, I object to the way it extends 120m along Turallo Terrace – this being more than half the entire 200m of that street frontage for the Park. Since this take-over coincides with an extension of the area occupied by the Tennis Club, the result is that this side of Bungendore Park is reduced to a token street presence. No “Town Square” here – just a small pathway leading in from Turallo Terrace and winding around the western side of the Mick Sherd Oval.

At perhaps 7m wide (it is difficult to guess from the drawings in App.3) this gap becomes the Lark’s sole street frontage to Turallo St. It’s little more than a laneway sandwiched between the two high fences -- the BHS basketball courts and play-space, and those of the Bungendore Tennis Club. If so, I would see safety concerns re access and night-time lighting as a cause for objection.

OBJECTION 2 – MICK SHERD OVAL

In regard to that Mick Sherd Oval (MS-Oval), I vehemently object to the way this terminology is used as if it applies to the whole of Bungendore Park. It does not. The name Mick Sherd is a recent arrival. It commemorates a local footballer and the name was first used about 2002 – the Park pre-dates this by more than a century.

There has been woeful confusion in almost all documentation in this EIS with this mis-naming of a splendid public Park, dedicated for “Recreation” by the public generally – not just for sporting teams on an “oval”.

This inexcusable misrepresentation seems to have become standard practice at QPRC over the years now. It has certainly skewed general perceptions of how to evaluate what the Park stands for and has certainly skewed everything underlying this SSDA.

It's as if the Oval is seen to be the SOLE rationale for this open space – nothing else matters. Thus, if the oval can be turned into a rectangle, and moved westward, then the extra east-side area can be considered surplus, and thus deemed “spare land”. As such, it justifies an easy take-over for incorporation into the footprint of new school buildings. Wrong.

Mick Sherd Oval might be part of Bungendore Park – but it is only part. On the other hand, it does play a major role as focus for community activities, being both well-loved and well-used – indeed the Appendix 9, the Social Impact Assessment (SIA) describes MS Oval as suffering from OVERUSE and suggests that assistance is needed to help with ever-increasing community demand.

Given this, I object to the DoE assumption that the Mick Sherd Oval can be co-opted away from the community as a way to fulfil the open space requirements for a new high school. It's a neat plan – to parcel up an agreement as part of the SSDA so that BHS gets exclusive use of the Mick Sherd Oval “for school curriculum use” all day every weekday. That's 8am to 5pm (and sometimes beyond) 5 days a week, summer and winter, for the whole school year.

I object because such managed use on “exclusive” terms will overwhelm any community access. Instead of the expansion SIA implies is already overdue, the people of Bungendore are being limited to use of left-over space/availability, and treated as left-over weekend users. When it's after 5pm and dark-as on a midwinter evening in Bungendore, there's not much usage to be had for “public recreation” in a Park, or on an Oval, or its left-over surrounds !

I also object to this aspect re Mick Sherd because there has been NO community consultation about this aspect as-such– not a word from SINSW, not a hint from QPRC to spell out what this heavy-handed hand-over to BHS will mean for something which until now has been taken for granted, as a 100% community asset. The main discussion has always been along the lines of “Do you like the idea of a new High School”, with little mention of anything that might involve subdivision of the Park, much less any give-away of Oval time.

As a former resident, and still with long-standing family connections, I have a fairly good idea how much both the Park overall, and Mick Sherd Oval as-such, are valued as an everyday, ongoing part of the low-key village life that makes Bungendore special. I'm 100% certain that if /when people know what is really intended, their answers will be deeply negative.

Even in the SINSW Info-Hubs, where there were glossy pics showing the school overlapping onto the Park, the talk was always about “sharing” Mick Sherd Oval. I was there on May 11 this year, and asked lots of questions – but heard nothing about any all-day “exclusive use” as an inbuilt part of the “school curriculum”. I object to the misrepresentation involved.

As a further note on Oval issues, I strongly object to the suggestion in the SIA that the Warren Little Oval in Elmslea can act as an adequate replacement for lost access/use re Mick Sherd Oval. Oooops, no. This is google map-think, not geography.

First, shape and size - the WL Oval is a full-circle and smaller than MS Oval –it's OK for informal games or kid's touch-footie, but nowhere near big enough to cope with adult games. These require a definite rectangle - 70m x 100m. That's at least 7000 m² of firm, level land, plus enough surround-space for safety, touchlines, line-staff, spectators etc.

This specification gives some idea of just how large the area at stake in the Park is.

Next, WL Oval is right next to Turallo Creek, which floods. Guess where the water goes – all over WL Oval. That's why it isn't used for home-building. Then there's the Elmslea location – not in the village, not on a main road, and not easy to get to. It's just not in the same ballpark.

OBJECTION 3 – MAJARA STREET CLOSURE

Also missing from those information sessions was any detail in regard to the closure of Majara St – that strip of roadway is something I know well, especially from visiting those Elmslea friends. From Duralla St, it was also a great way to avoid driving through the shopping area when heading to/from (say) the Green Shed facility out on Tarago Rd.

From personal experience I know the busiest time for use is often on Friday afternoons, with people heading out to Kings Highway and the coast. And on Monday afternoons of a holiday weekend, there can be a queue of cars, boats, caravans, motorhomes (even back over the railway crossing) waiting to turn right into Majara St for the shortcut straight through to Turallo down onto McCusker and then north or north-east.

In the Transport Assessment Appendix 6-a, I look at pictures which show virtually no car activity on any of the roads – just the odd blurry shape, way in the background. I wonder when on earth did they take the pics--- then read that the assessment was done on one day in early November 2020. According to the App, there were two short two sessions, each just 1½ hours in the morning and afternoon, for an all-in total of 3 hours, and all based on Majara St still being an open road. That's it.

And yet in an hour or so while the count was at Majara ST, there were 283 cars – that's more than 4 vehicles per minute using this road, in effect a steady stream, with one car every 30 secs in either direction.

That was the totality of on-road data-collection for both the GHD Draft of February 2021, and now, because nothing new was done or added, the SSDA Appendix 6-a, and 6-b. .

So while the paperwork in this SSDA might have a more glamorous presentation, it offers little to no relevance for traffic realities of Bungendore for a school day that DoE information describes as 8am to 5pm – and certainly not as a basis for planning traffic management in a whole new scenario of a Secondary School of 450 students – not when a large number of them will be driving in from outlying areas like Sutton, Carwoola, Bywong, Captains Flat, Wamboin, and who knows how many rural properties in between.

From information in App. 6-a, it seems there was NIL research on done this – the only contact with student was with 174 families – ALL with a Bungendore township address.

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I object to anyone using such shallow information to justify closure of Majara St – and especially not when (a) the original GHD information gathering was on the basis that Majara St was open and would remain so, and (b) the later justification effectively ignores that discrepancy and says the closure won't make any difference. It's a sham report – but if this SSDA is approved, one with dire consequences for Majara St.

OBJECTION 4 – BREAKDOWN IN COMMUNICATIONS

Given the importance of Bungendore Park and the Common in everyday life, you'd expect QPRC to be super-careful to keep the community informed. But in regard to BHS, the opposite has been the case. It's almost as if there's been a concerted campaign to PREVENT people from knowing anything at all about developments re BHS.

I was not in town at the time of the first Info-Hub but I did attend the second on 11 May 2021. It had a number of diagrams and glossy computer-generated illustrations of the proposed school – most done from an angle that carefully down-played the dual loss of Majara St and that end of the Park. There was a lot of happy-clappy talk about the wonderful "Education Precinct" – but very few answers to queries about issues re Crown Land dedication or the heritage listing of Turallo Creek Reserve. I got the distinct impression that the SINSW in attendance (and there were at least two high level execs) hadn't even realised that CL might be involved.

I not only object to any such failure to appreciate the legalities of Crown Land, but I have tried to get the matter clarified by preparing a 10pp letter to QPRC (copy to come with this submission) on the CL issues that need to be addressed. Given all the above, DPIE should not be surprised to learn that I have had scant acknowledgement and NO real response.

I also object to the way community "engagement" has been sabotage by QPRC – either by omission, or by deflection. By leaving it all to DoE, the community has been left without a local leadership ready to give guidance in the matter. This includes the peremptory way QPRC has acted in accepting the DoE presentations of August and late Oct last year without a single warning to residents. that anything so calamitous might be afoot. As far as QPRC has been concerned it's "nothing to discuss".

I also object QPRC's rush to rubber-stamp approval of the closure in April 2021 - months before any practical details (ie like this SSDA) were made available for public examination and comment. The whole process has been wrong.

In fact, I have recently become aware of communication from SINSW intended for reading to Crs at a QPRC meeting on 10 March 2021. The tone is somewhere between a bullying and threat, both in regard to the sale of Palerang Council Chambers (one of the properties in the QPRC group of five), and perhaps more worrisome, to the authoritarian power available to DoE bureaucracy via SEPP2011 and the SSD process. This heavy-handed approach fits in with being assailed by a POLICE presence at the entrance to that Info-hub last May.

Above all, I object to the distortion of governance by such attitude.

I also object to the closure of because the closure has so many ramifications, yet there has been NO real discussion of the issues involved by QPRC, no community consultation as such, other than by vague implication in DoE surveys a year ago when the topic might have been BHS but the main Question wasn't about location, but the far simpler issue of "Do you want a High School?" – and of course, most people were happy to be answering yes.

And if you asked today, the answer would still be YES. But for me, this would come with a giant caveat – only if it doesn't diminish and destroy what Bungendore holds dear. Only if the location makes sense. Only if it's as a more appropriate alternative site.

Taken for Granted – is it now Goodbye Grid -??

It's obvious that the ONLY rationale for closing this street is its core role in the BHS proposal. Yet Majara St is an integral part of some remarkably advanced 19th century town planning for a population which at the time numbered just on 200 people. Even more remarkable in 2021 is how intact this original 150yo grid pattern still is in the central village.

Based on blocks of a regular shape and size, usually 200m x 200m. square, it provides a generous road width, and this standardised to create a uniform grid for all streets in all directions. A street-plan put together in the era of Cobb & Co has not only survived so well, it now copes so well in a car-based world that its functionality, and contribution to the community, are both taken for granted.

Not any more. This proposal for road closure is not just some inconvenience caused by the fake excuse of trying to cobble together a convoluted BHS. It's may be just one length of street – but blacking it out with big black markers (as the EIS does in Appendix.6-a) destroys the integrity of that grid pattern. That sudden no-go I see indicated at Gibraltar St means more than just forced detours for locals. It threatens an innate perception of order which every visitor subconsciously sees, feels, and responds to. This sixth sense is a subtle asset, but one which underlies Bungendore's appeal as a traditional heritage village.

Closing Majara isn't just losing a road, it also means that Bungendore Park loses its whole Majara street-front. Suddenly there's nothing there – no Park, just a stretch of industrial-style buildings that are bigger, bulkier, higher than they should be, with slab-like front, and accessed off a driveway off a roundabout.

I totally object to any dilution of this rare street heritage, and urge all decision-makers in the SSDA to see what's at stake here, Park included. If this road closure is allowed to occur, then the grid integrity is gone. And once that's gone, it's gone forever.

Of course the carve-up of Bungendore Park is of huge significance, and I fiercely object to it. But this road closure is the nub of it all. Because without the roadway, the whole Majara Precinct falls apart. It literally can't be built.

This roadway is THE bridge that links all those QPRC land-holdings along east Majara St (ie the lots backing onto the rail corridor) across to the Majara street-frontage for Bungendore Park. No bridge equals no Park, no subdivision, no footprint for the school.

What stronger reason could there be for objection ? What issue could be more pertinent for debate ? Yet when the closure came up for decision at a QPRC council meeting on 28 April 2021, I was a registered speaker - but not allowed to mention the link in any way. Even the slightest mention of the school was cut-off. And Crs also were instructed to ignore it. In context, the whole meeting was an egregious non-sequitur, and prime example of the Wednesbury principle, ie of being so unreasonable as to be culpable.

I hope this instance re QPRC's systemic lack of transparency in regard to the whole BHS project will give some idea of how little the community has been able to be involved up till now. Though far too much of the EIS is skewed by misrepresentation, riddled with flim-flam, flaws and even fake (especially re community surveys) the information has been a huge help)

OBJECTION 4 – TURALLO CREEK RESERVE

I have friends who live in Elmslea and the family includes 3 energetic poodles. After listening to their enthusiasm for the Common and its off-leash dog park. I have no hesitation in objecting to anything which might limit or constrain their use of this area. It's not just the dogs –my friends are not young, and access to this public open space for active recreation is how they stay healthy and well. It's also a great way to meet, and keep, friends.

I am also very familiar with Turallo Terrace, using it as the short-cut way to McCusker and Hyland and on to the Simms Drive area of Elmslea where my friends live. With this experience I am extremely perturbed at the Architectural Drawings in Appendix 3 which seem to show a zebra pedestrian crossing that links the Majara Precinct part of BHS, with the other side of Turallo Terrace and the school's proposed Agricultural Plot.

The Architectural Drawings in this EIS suggest that the format of this crossing will reduce the roadway to one-lane, not its current two. This is of great concern to me, even just as sometime visitor. It would be even more of a problem for my friends who use this route daily for travel with the dogs to/from the Common, or heading into Bungendore's CBD shopping generally. The curve there already calls for caution - if this narrowing is true, then on grounds of road safety alone, I object

While the reason for a crossing is probably based on student safety – but in reality this is only required because the SSDA proposes a two-part school. And this split-site arrangement is a direct result of whatever background pressures are trying to enforce the Majara St closure and its subsequent disasters - subdivide the Park, disappear a street-front, demolish the Community Centre, dislocate Abbeyfield and delay their plans into limbo. The list gets, and my objections more meaningful, every time I write it.

But back to Turallo Terrace as it heads towards McCusker From personal experience I know how active the road in this area can be, and remain convinced that traffic here needs to be kept as a free-flowing as possible – not only for now, but even moreso for the future when the many developments now approved within the Bungendore Structure Plan will start to appear.

The first phase for the nearby Elmslea area predicts about 1400 homes – more than triple what's already there. And a second phase further north is for another 3000+.. .

How could any sane town planner deliberately allow a one-lane choke-point metres from a blind curve at the top of a hill on a road that's already getting busier by the year, and set to become a key entry road for so much development ? It's madness.

And it's all so the BHS project can land-grab a big triangle out of a much-loved Common (aka Turallo Creek Reserve) so the stats can be used to bulk up the overall land area for a school that otherwise can't qualify for construction under DoE site guidelines.

That's madness, but with crazy-smart political cunning.

OBJECTION 8 – THE \$10 MILLION DIFFERENCE

There's another reason why I will object strenuously if by some bureaucratic swizz or other happenstance this calamitous SSDA is approved. It's called Jerrabomberra (Jerra) and acts as powerful check-point to compare with BHS.

Right now this growth suburb a few kms south of Queanbeyan is also part of the Government's \$7-billion investment in NSW school infrastructure – in effect provides an excellent equivalent for comparing what can go right – and how things can go horribly wrong.

An all-new 500 student High School for Jerrabomberra (HS) was announced in late 2019 – about the same time as one for Bungendore – a 400-600-student BHS. Much has already been settled at Jerra. They've selected a site, agreed tax incentive with a willing seller, done the master-plan and it now looks as if everything's underway in pre-construction mode.

The Jerra HS is in a good location on the edge of town with its own large land (single site of course!) with reasonable proximity to Jerra Primary – and as of Oct 2021 it's site-confirmed and getting ready to go. There's a big difference though- Jerra budget is \$24 million – for Bungendore it's \$34-37 million (I've heard both and haven't found any mention in the EIS). You'd expect a bigger school, with more students, in a newer, smarter residential area would cost more too. No. This time it's the opposite, and given all other factors are roughly equal, the only real difference HAS to be related to the land issues.

For BHS, the dollar difference is a DIS-location.

I definitely object to a \$10 million over-spend for what even an idiot can see is an idiot idea in the first place. To be honest, I can't understand how QPRC councillors can sit on their hands, nod their heads, and let this happen. And for reasons explained earlier, I certainly object to SINSW speeches that use SSD as a threat to keep QPRC in line.

A FEW FINAL COMMENTS

There are so many reasons to object to this SSDA -I'm sure they'll be covered in other comments by Bungendore residents who feel as strongly about the Park and Common as I do.

No doubt there'll be input from others who, far too trusting of official non-information, and so desperate to see a new High School in Bungendore, have been deluded into urging approval. If so, it will be a case of thinking that the only way for BHS to happen is to agree to anything, no matter what. But we know there IS an alternative site, that it is a better deal, and that it can happen far faster than what in this wretched SSDA.

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The truth is -- almost everyone agrees with the other side. We all want a High School and we all want it now. As an objector, I am sure the only difference is that we can see a little more clearly how, and why, this EIS is a recipe for delay and disaster.

Only the LOCATION NEEDS TO CHANGE.

We take a stand against this SSDA not in spite, but because we KNOW there's an alternative site, ready and waiting to be the land under a BHS priority modular build.

In short – no Majara roadway, no joining up with the Park, no land for the footprint of main buildings for the new High School. And in fact, not enough land, full stop. Not enough for now, and nothing for future growth. Even if this complex wish list of land does get to consolidation, the patchwork still only adds up to 2.9 ha – way below the 4 ha minimum.

It just doesn't make sense. But it does inspire all manner of questions that sudden “significant change of plan” to dump 6 months' worth of due diligence on another very large, level, available, close-to-town, SINGLE site with a willing seller, a fair price, and tick-all-the-boxes contract-ready in June 2020. BHS was ahead of Jerra -- it could have been half built by now.

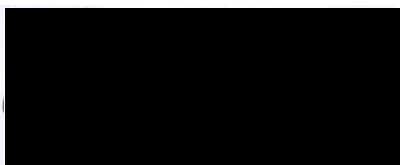
CONCLUSION

In this submission I have kept the focus on those pivotal sites, on heritage and what the closure of Majara St closure would really mean, the disrespect regarding the War Memorial Arch, the significance of traditional street patterns in this heritage village – and above all the importance of Crown Land as a community asset.

As a founding member of Crown Land Our Land I can only say that the CLMA issues raised here by BHS are novel, and will have an impact on how similar situations are handled throughout NSW. CLOL has also put together a detailed submission re SSDA 14394209 and as Secretary, I have already had it accepted on the Major Projects Planning Portal.

This is my personal submission. Thank you.

Yours sincerely



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