

18th October, 2021

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SSDA 14394209 Bungendore High School

I object to SSDA no. 14394209 for Bungendore High School.

The Department of Education has invested time and resources in producing an Environmental Impact Statement to justify their choice of the Majara/Gibraltar/Turallo site, but fails to convince me that this site is in any way suitable for a high school. A high school on this site will not be fit for purpose and this plan is causing considerable grief to the broader community of Bungendore. Better sites are available and the sooner the plan is changed, the better for everybody.

I have not made any reportable political donations in the previous two years.

Below please find my responses to these attempted justifications:

Environmental Impact Statement
New High School in Bungendore
SSD - 14394209

Executive Summary

p. 12 Overview of the Proposal

A new building (Building E; to replace demolished community centre) will accommodate a Public Library, Council Shopfront and Health Hub: but what about the other users of the Community Centre, for example:

Bungendore Community Aid, Bungendore Playgroup (the Community Centre has a playground in the courtyard), meeting rooms for community groups etc?

Establishment of an agriculture plot on the Bungendore Common is a very unwise plan. The area floods regularly. Computer-generated images of the proposed Ag plot show stock grazing there. That must never be permitted due to the danger from flooding. Crops grown there would also be in danger. In short, it is not a suitable site and would be dangerous to students, staff and animals.

The off-site works, including parking areas, footpaths and even new roundabouts, are going to be highly disruptive and noisy for the rest of the Bungendore community. The threat of thousands of tonnes of concrete covering up our green surfaces, both on the school site and

off-site, is totally unwelcome due to increased heat storage in our hot summers and increased run-off instead of allowing rain to soak in.

Project background

The DoE is lying when it claims, (p. 13, para. 4 and on many other pages) that: "... a public expression of interest was initiated seeking landowners and developers willing to offer land to the DoE for the proposal; however, no suitable site was identified through this process."

Hard-won FOI results have proven that a suitable block was indeed found, through the EOI process. The owners of "Ashby" on the Tarago Road (adjacent to the Elmslea housing estate and a new development currently underway to the north-east, referred to as North Elmslea) were about to enter into an agreement with the NSW Government, when the Barilaro plan for a high school on Bungendore Park was announced.

p. 18 : "Ultimately, the subject site was identified as the most suitable location for the proposed new high school in Bungendore given its central accessible location and relatively few site constraints."

I don't know why the subject site was identified as the most suitable, but it certainly wasn't because it has "relatively few site constraints".

Here is why the site is unsuitable:

- It is too small, so there is no room for more buildings as Bungendore expands ("The Bungendore Structure Plan 2048 anticipates an additional 3,568 people will be living in the town over the next 10 years.")
- It requires the demolition of existing, valued, popular, perfectly-sited community amenities.
- It is right next to the railway line and heritage-listed railway buildings. It has just been revealed that the railway station precinct is contaminated with lead.
- It will lead to massive traffic and parking changes which will threaten the safety of not just primary school children but pre-school children as well.
- It takes over the much-used Mick Sherd Oval for most daylight hours of the week, with the threat of eventually subsuming the oval into the school grounds and restricting public access altogether (see above: the site is not big enough for the expanding Bungendore population. The only direction it can expand is into the park.)

Site Analysis – Regional Context - p.38: The extent of new housing development in Bungendore is under-reported; south Bungendore is also undergoing very significant in-fill and greenfields development. In-fill subdivision is happening all through the central, older streets of town as well. Rampant growth is the town's main feature.

Description of Proposed Development - Table 3.1 (p.47)

Demolition: I object to proposed demolitions on grounds that a) apart from the road, all the assets belong to the community as much as to QPRC, given they were built partly from community fund-raising and from grants, so their removal is wasteful and disrespectful, b) because knocking down perfectly good and functional buildings/assets in the midst of a climate emergency is irresponsible and ignorant, and c) because no demolition would be necessary if an empty, greenfields site had been chosen.

Tree Removal: I object to removal of trees because a) all trees on the park were planted by the community since Park Gazettal in the 1880s (Council planted nothing) and we were never consulted about whether we agreed to this site for a high school, and b) replacing carbon-dioxide-sequestering mature trees with saplings is irresponsible in a climate emergency.

Parking: I object to the loss of many parking places outside Bungendore Public School, the School of Arts and Post Office, and along Majara St. Parking in Gibraltar St and Majara St. is already crowded. I also object to the plan to carve even more land from the park, and remove trees to build 35 parking spaces along the south side of Turallo Terrace and 5 more on the north side.

Roundabouts: I object to the 2 new roundabouts proposed for Gibraltar Street. Bungendore is currently suffering considerable disruption and hold-ups due to roundabout construction on Molonglo Street,. Such disruption creates severe challenges for already struggling businesses nearby. Two new roundabouts will cause more destruction of trees and more concrete surfaces and changed conditions. The DoE must revert to the originally chosen, but then rejected, site on Tarago Road, thus there would be no need to disrupt our lives so much.

Security and Fencing: I object to the fencing off of the oval; even if the fence is “lower in height” (lower than what?) it will make the supposedly “shared” oval less accessible to the public outside of school hours.

Statutory Context

5.2 Permissibility of the Proposed Development

The proposal is based on the assumption that the Dept. of Education can acquire a large portion of Bungendore Park and a portion of Bungendore Common to construct the high school and agriculture plot. All Crown Land is managed under the Crown Land Management Act 2016. Dedicated Crown Land (Bungendore Park) and reserved Crown Land (Turallo Creek Reserve) cannot be sold because the Crown Lands Minister does not have the power to give consent. Neither can the land be compulsorily acquired or subdivided, nor can it even be leased, given that Crown Land rules now say there can be no long-term leasing for Crown Land Reserves that do not have a Plan of Management in place. Neither Bungendore Park nor the Common has a Plan of Management.

SSDA procedures do not over-ride CLMA 2016, which is not an “environmental instrument”; it is the law.

5.4 Objects of the EP&A Act (p.77)

c) to promote the orderly and economic use of land:

It is claimed that the development meets this requirement by placing a new school on relatively unconstrained land to cater for the future population increase.

This proposal does not promote the orderly and economic use of land.

This proposal is, at best, chaotic, given it is trying to re-arrange a large portion of public land in Bungendore to squeeze large buildings and playground into a small area.

The proposal is not economic. The cost of acquiring land in the centre of Bungendore and replacing existing community infrastructure which will be destroyed to accommodate this development mean that the cost to the State Government is millions or even tens of millions of dollars higher than it needs to be.

This is clear from the recent State Budget, which set aside:

- \$34.7 million to construct a new high school with capacity for 400 (not 450, as stated in the SSDA) students in Bungendore; and
- \$25.9 million to construct a new high school with capacity for 500 students on a greenfields site in Jerrabomberra (approximately 30km away, adjacent to Canberra).

This means that the planned Bungendore school will cost 34% (\$8.8m) more, to provide capacity for 20% fewer students on a smaller site in a cheaper, regional location – even though it will use the existing Council chambers and take over the existing public oval. Not only that, but one of the EOIs offered land for a new high school to the Department of Education for free. If an objective of the EP&A Act is economic use of land, this DA does not meet that objective.

The Jerrabomberra High School (Queanbeyan) is being constructed on land that was offered by a developer.

d) to promote the delivery and maintenance of affordable housing:

This proposal delays the delivery of affordable housing, by virtue of acquiring from QPRC the land set aside for an Abbeyfield House, the DA for which had been lodged just prior to the announcement of August 14th 2020 that a high school would be built there instead. Provision of affordable housing for seniors through the Abbeyfield project was thus set back at least two years given that the committee would have to start again from scratch on a new site.

5.9 Palerang LEP 2014 (p.84)

RE1 Zone Objectives

p.89: I object to the claim that Warren Little Park includes an oval: in fact the oval is below regulation size and therefore unsuitable for rugby or cricket matches.

Palerang DCP 2015

Part D Area Specific Conditions:

”The proposal provides for a low scale design which is consistent with the surrounding town and rural landscape.”

I object to the assertion that this school is a low scale design; 3 two-storey buildings will have a huge visual impact in Bungendore township. There is no way the school is consistent with either the town or the landscape. The primary school next door is all one-storey; the school hall has a high roof but is not two-storey.

Community Engagement

Community engagement by the Dept of Education was a farce from beginning to end.

Assessment of Key Issues

Table 7.5 ESD Measures

Energy : Scrutiny of building design for the proposed buildings shows little or no change from the buildings that were being erected when I was in high school in the 1970s.

Surely the buildings in this plan are misleading, as it is claimed under 7.5.2 (ESD Measures, p. 130) that building design will take into account climate change challenges, therefore passive solar design will be required for all new buildings to accommodate increased temperatures and reduce the carbon footprint of the buildings themselves.

North Elevation Building D+E (p.55): this is a good example of what not to build: a concrete block facing north with few or no windows, no eaves, no landscaping to block the sun in summer, and with no ability to harness that heat in winter.

Bungendore experiences a big range of climatic conditions: from very cold weather in winter when minimum and maximum temperatures are usually 2 to 3 degrees colder than Canberra and winds are stronger, to extreme summer heat.

The goal of solar architecture in a challenging climate like Bungendore's is to balance winter penetration of light and heat with summer protection from heat. Therefore there need to be architectural features such as eaves and sunshades which block summer sun but allow in the winter sun (which is lower in the winter sky) when needed.

Transport: active travel is a laudable goal but will be hard to achieve in a community whose lifestyle is based on commuting long distances in private vehicles.

Climate Change Resilience:

- see above re solar passive design to minimise energy use
- use of native plants is not always a good choice for shade/cooling; better to use deciduous exotic species (providing winter sun and summer shade) that thrive locally such as Ulmus, Quercus, Robinia, Fraxinus raywoodii, Gleditsia and others which have proven hardiness in Bungendore's extreme climate. Deciduous trees offer far denser shade, lowering the surrounding temperature; Eucalypts provide less shade in hot conditions.

Aboriginal Cultural Heritage

- Impact Assessment

I object to Dot point 1: "No Aboriginal sites were identified within the site."

The possible Aboriginal grave must be investigated. There is evidence from Ground-Penetrating Radar that a possible grave site exists in the south-east corner of the park.

Heritage and Archaeology

7.7.4 Heritage impact assessment concludes that “.. the heritage impact of the proposal is considered negligible.” This is pure sophistry!

Bungendore Park sits in the middle of Bungendore's premium heritage precinct. Of course the new high school buildings and fences and signs and concrete walls and aprons and parking areas will have a serious impact on the quality of the heritage streetscape which is so valuable to Bungendore community!

Flooding

The Impacts of Flooding (p.158) fails to consider that, although the new buildings may well be above the floodplain, the main access road to the north (Turallo Terrace/McCusker Drive) regularly floods at the low-level crossing which lies a short distance from the proposed high school site.. In several recent floods, the north of Bungendore (Elmslea and Old Elmslea) has been completely cut off from the rest of the town for several hours. Since storms and floods often occur in the early afternoon, it is likely that students would be marooned on the southern side of Turallo Creek several times a year at the end of the school day.

Contamination

In the light of recent discoveries of excessively high lead levels along the rail corridor adjacent to the high school site, it is all the more important that further investigation of soils on the Majara St site and the proposed ag plot take place.

Conclusion and Justification

The contents of the dot points are misleading, e.g.

- Bungendore already has a public library, community centre/health hub and Council shopfront.

This proposal is not providing these things, it is taking them away!

The proposal was not designed in consultation with the community: it was imposed on the community in a shock announcement. Most consultation has taken place post-announcement. If this proposal is not approved, a better one should be offered, on a better site! A high school has been promised and it should not be on a “Take it or leave it” basis! It should be the best possible school on the best possible site.

The proposal is not fit-for-purpose and will result in unacceptable social impacts

Yours sincerely

David Watson

Bungendore