

## Braidwood Greens



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

### **Re: New High School in Bungendore, Application No. SSD - 14394209**

The Braidwood Greens have been active in the community since 1993 and have members in Bungendore as well as in Braidwood and the surrounding villages. Thankyou for the opportunity to comment on this proposal, to which we are opposed.

We believe that this is an ill-conceived idea and we have deep concerns about the motivation for it – it appears to have been nothing but a blatant pork-barrelling exercise by the now resigned Member for Monaro, proposed for a site that is far too small.

A proposal like this needs to be properly assessed but it is clear that the Social Impact Assessment (SIA) prepared by Urbis has not been adequately researched.

◇ Where is mention of the presence of Bungendore Pre-School in the proposed high school precinct plans? The Pre-School is directly opposite the northern boundary of the proposed development and will be heavily impacted by the changes in regard not only to road safety but also from noise and dust etc. during demolition and construction.

◇ Emphasis is placed on the “engagement and integration of Aboriginal culture”, as it should be. Why then, is this proposal set to destroy a grave site which, according to local knowledge, is the resting place of an Aboriginal person?

◇ Why was another, much more appropriate site for the long-promised high school adopted, then discarded? This *Ashby* site, or other greenfield sites which were rejected for spurious reasons, would have suited the project far better and made the work of School Infrastructure much easier, while preserving the historic heart of Bungendore.

◇ Why does the SIA fails to recognise the current value of Bungendore Park and surrounds to the residents of Bungendore? This park is vital:

- as open green space for sports fixtures and many kinds of spontaneous recreation;
- in the preservation of our architectural and cultural history;
- for the safety for children and other pedestrians; and
- as part of the clustering of primary school and pre-school, playing fields, public pool, public library, community centre and railway station, all on one convenient, central site.

The Braidwood Greens acknowledge the comprehensive research done on this issue by local residents and refer you to an example of the detailed objections to the Social Impact Assessment which we have copied below. We endorse the sentiments expressed as well as the facts on which the information contained is based.

In summary, we urge the NSW Department of Education to return to the earlier, much more sensible plan to build the school on *Ashby*, Tarago Road, or some other site that will not require massive displacement of activities, disruption of lives and destruction of assets.

Please note that Braidwood Greens have made no donations relevant to this or any other proposal.

Yours faithfully,  
Catherine Moore  
convenor/secretary  
on behalf of Braidwood Greens  
October 18, 2021

No.	REFERENCE IN THE SIA	OBJECTIONS/COMMENTS	SUGGESTIONS FOR IMPROVEMENTS/CHANGES
5.1	<p><b>Expected and perceived impacts</b></p> <p><b>Neutral to low impacts:</b></p> <p><b>Increased noise and vibration</b></p>	<p>Fails to consider the considerable noise and vibration, as well as dust and possible contamination, from demolition of pool and community centre. Both Primary School students and Pre-School infants will be very adversely affected.</p>	<p>The proposed site is situated in the busiest precinct in the town. The best way to lower the impact of construction noise and vibration – and negate the need for demolition – would be to build the high school on a greenfields site, removed from the populated, central area of Bungendore. That way only a handful of neighbours would have to put up with years of noise and disruption.</p>
6.	<p><b>Assessment of Significant Impacts</b></p> <p><b>6.1 Engagement and Integration of Aboriginal Culture</b></p>	<p>Correction: the Ngarigo people are not local custodians; Ngarigo country is further south in the Snowy Mountains district. (Perhaps this is a typo. Should the word have been Ngambri?)</p> <p>“Council’s LSPS contains a key planning priority to work closely with Aboriginal communities to ensure Indigenous heritage values are recognised and protected during development.”</p> <p>Yet the possibility that an Indigenous person has been buried on the proposed site does not seem to be important enough to have been properly investigated.</p>	<p>EcoLogical Australia undertook research about the grave in all the wrong places. Personal communication with Ngambri and Ngunnawal elders has revealed to me a paucity of knowledge of Bungendore Indigenous history. Tragically, there are no known sites and relics, apart from stone artefacts and the grave. Bungendore district was settled by white people very early in the invasion, and extermination of Aboriginal residents carried out very efficiently. Members of local Aboriginal communities do not have knowledge of the grave, but that is not their fault. However, some local whitefellas are the custodians of this information, and they have photographic evidence of the site, and none of them have been consulted. Further, a GPR survey (2012) of the grave site revealed “an area of interest” showing “anomalies” which were marked on the ground using red paint, and the</p>

			<p>company who undertook the survey (O'Donnell Griffin) recommended more investigation be undertaken by Palerang Council. That has never been followed up and needs to be done before it can be categorically stated, as EcoLogical has done, that there is no Indigenous grave in the park.</p> <p>I make this plea on behalf of Indigenous people who have been made aware of the possibility of the existence of a grave, and who are distressed that the evidence is being ignored.</p>
		<p>The claim (dot point 1, page 20) that big windows and skylights to view the creek (which could not be visible from the site unless all the riparian vegetation was removed) and the sky (visible from most buildings that have windows, surely?) will engender cultural inclusivity and support the development of young (indigenous) people is fatuous.</p> <p>The suggestion (dot point 4, p. 20) that existing exotic trees should be cut down just because they are exotic contradicts the findings quoted in Section 3 Policy Context which state that: a “relevant principle” from the Bungendore Structure Plan 2048 is to “maintain the landscaped setting of Bungendore...which combine(s) the exotic and native species....”</p>	
6.2	<p><b>Improved Access to Education</b></p> <p><b>Current environment</b></p>	<p>No-one could argue against this motherhood principle, but to put up false arguments does no-one any favours.</p> <p>Referring to p.22:  <i>“The capacity of these schools (NSW high schools in the district) to accommodate the Bungendore population is declining.”</i>  In 4.3. Local School Context it is stated that Queanbeyan High School has reached its capacity, of 524 students; this is in spite of there being at least 800 students in attendance at QHS in the late 1990s (according to an ex-teacher). All the buildings are still there. More information is required to explain why the capacity of</p>	<p>Department of Education needs to provide more detailed information to the public as to the availability of places in existing high schools in the Queanbeyan district, as well as Braidwood Central. Otherwise it looks like the decisions (re catchments that include Bungendore) have been custom-made to fit the BHS proposal.</p> <p>The imminent construction of a public high school in Jerrabomberra (Queanbeyan) also has significant implications for</p>

	<p>Queanbeyan High School has reduced.</p> <p>Another claim: “<i>QHS is the only existing NSW high school that includes Bungendore in its school catchment area.</i>”</p> <p>Until very recently, a large cohort of Bungendore high school students chose to attend Braidwood Central School. Suddenly, Bungendore is no longer in the Braidwood catchment? What implications does this have for the staffing, curriculum and status of Braidwood Central? This is not revealed.</p> <p>Also, regardless of whether Bungendore is in the catchment of Karabar High (in Queanbeyan), Bungendore primary children have for many years been accepted at Karabar and will probably continue to go there.</p> <p>A small high school such as the one proposed for Bungendore (in spite of Bungendore's extremely high population growth rate) will not be able to offer the range of subjects that the Queanbeyan high schools can.</p>	<p>the future of the existing Queanbeyan high schools.</p>
<b>Impact of the proposal</b>	<p>P22: It's erroneously claimed that “<i>consultation on the proposal indicates that the new school is much needed and wanted</i>”, with “<i>an online survey conducted by SINSW in November 2020 showing that 89% of the 74 respondents felt a new high school in Bungendore would benefit the local community</i>”.</p> <p>A total of 74 people, out of a population in Bungendore of 4893 (2020 figures), does not represent a majority of Bungendore citizens.</p> <p>In spite of protestations to the contrary, it is a fact that consultation with the Bungendore community, apart from a few targetted stakeholders, was almost non-existent, and the proposal was presented as a “done deal” by our (previous) local member Mr. John Barilaro.</p> <p>Moreover, most objectors to this SSD are not opposing a new high school; they are protesting against the Department of Education acquiring our hard-won amenities and ruining the environmental</p>	<p>The Department of Education has not done its homework.</p>

		<p>and heritage values of our town.</p> <p>“Currently, all secondary students in Bungendore are reliant on vehicles or buses to travel to school.”</p> <p>The expressed hope that active travel will replace the use of cars and buses is a faint one. Most children arrive at Bungendore Public School in their parent's vehicles, and that is because parents drop them off on their way to work in Canberra, or because they do not feel it's safe for them to walk or cycle to school. This pattern will continue well into the high school years. In later years, students will drive themselves. While there are some shared paths for walking/cycling, many students have to negotiate the very busy Kings Highway to get to the public school and hence the proposed BHS site. QPRC would need to spend considerable sums on the upgrade of foot and cycle paths to make active travel a less dangerous option.</p> <p>There seems to be no recognition in this paper of the fact that many students live on rural residential or rural properties and may travel 25 kilometres or more to school in Bungendore, and some do not have easy access to buses. Active travel on rural roads is neither safe nor practical for reasons of heavy traffic (Kings Highway and Macs Reef Road) and extremely cold and windy weather (this is the Southern Tablelands. It snows here.)</p> <p>SIA Recommendation: Aim for the catchment area for the new school encompasses (sic) the entire suburb of Bungendore, including growth areas on the edges of the town.</p> <p>This reference to Bungendore as a “suburb” demonstrates how little the writers of the document know our part of the state. And the catchment for the new school will encompass a far larger area than the town of Bungendore and those growth areas; it will stretch to Wamboin/Bywong, Mt Fairy, Mulloon, Sutton and possibly as far as Captains Flat, Carwoola or Gundaroo.</p>	
<b>6.3</b>	<b>Access to Open Space and</b>	Open Space and Recreation Access: Warren Little Oval and park:	The high school should be built on an alternative and larger site

	<b>Recreational Facilities</b>	<p>this area is part of the Bungendore Common, and we are grateful to have such a valuable open space, but it is no substitute for historic Bungendore Park. Warren Little Oval is not a full-sized oval so cannot be used for games of rugby or cricket. There is no playground on the Common. It is not situated close to the school and other destinations such as the Post Office or Pre-School or Library. Therefore the claim that <i>“it is likely that the casual daytime recreation needs of the community can be accommodated by this space”</i> (p.24) is false.</p>	<p>away from the centre of town, with adequate space for sports fields and open areas for playgrounds.</p> <p>Bungendore citizens are proud of their pool and their role in building it, and while some repair and retrofitting of the pool would be appreciated by locals, a new pool is not necessary and we are not asking for it. The site for the new pool is inferior in many regards.</p>
		<p>Pool Access:</p> <p>Claims that Bungendore Pool is past its use-by date are exaggerated. Like the other pools in rural QPRC, Braidwood and Captains Flat (both much older than Bungendore pool) there is a need for investment in repairs. Extension of the pool could be justified. Either or both of these options would be considerably cheaper than the cost of demolition of this pool and construction of a new one on a questionable site next to the sewage ponds and unprotected from the strong cold/hot winds that batter our district, and a kilometre or more from the primary school and pre-school.</p> <p>Demolition of the pool is a requirement of the Department of Education; Bungendore community is not demanding a new pool. The community contributed funds raised over many years to the cost of the pool. The community applied for a grant from the state government to help pay for the pool. Therefore the community has a very large stake in the ownership of the pool yet it has had no say in its future. The Swimming Club was not consulted before the BHS Proposal was announced.</p>	
6.4	<b>Access to Community Infra-structure</b>	<p>Bungendore Community Centre: Council intends to sell this site to the Department of Education, however it is not theirs to sell! The clue is in the name: “Community Centre”.</p> <p>As with Bungendore Pool, considerable community effort and labour went into the establishment of this building. As a sturdy,</p>	

		<p>large, well-built centre it has served the community well for three decades and there is no need for it to be replaced. As with the pool, it is the desire of the Department of Education that our centre be demolished. Bungendore Community has not asked for a new community centre. The history of the Community Centre and the effect of its prospective demolition on community groups such as Bungendore Community Aid can be read here:  <a href="https://savebungendorepark.org/community-centre">https://savebungendorepark.org/community-centre</a></p> <p>The new building promised by the Dept of Education to replace our centre is inadequate. For example, it does not include a playground. It is unclear from the DA whether the extensive meeting rooms we currently have will be replaced, given that Building E will apparently also house a library.</p> <p>It is also aesthetically inferior. The current Community Centre is far more sympathetic in design to the surrounding precinct. Building to <i>modern standards</i> promised in the new building does not mean <i>higher quality</i>, as claimed, and the carbon footprint of demolition is high. (which means that the requirements of ESD are not being met.)</p>	
6.5	<b>Access to Council Services</b>	<p>This impact statement fails to acknowledge community ownership of our former Palerang Council buildings and what they represent to our community, nor how we feel about that loss. They were constructed about 15 years ago by our council (Palerang) and we are proud of them. They brought access to local democracy to Bungendore for the first time; previously we belonged to Yarrawlumla Shire Council and headquarters were in Queanbeyan. Now, due to forced amalgamation with QCC, we look like losing our local democratic rights again. We are not happy. New council offices may well be built at a new site, however there is no promise that Council meetings will continue in Bungendore.</p>	<p>De-amalgamation from QPRC is desired by Palerang residents. A motion was put recently at a QPRC meeting and narrowly was defeated by the Mayor's casting vote. Amalgamation has been disastrous for us. This proposal to put a High School on our park has been driven by the Queanbeyan staff of QPRC who have no regard for the needs of our part of the LGA.</p>
6.6	<b>Change to Character</b>	<p>The Impact Assessment has completely failed to acknowledge the value of heritage</p>	<p><u>Heritage – listed properties and assets that will be negatively affected by the BHS proposal:</u></p>



	<p>to the Tourism industry of Bungendore. Bungendore is a very old town. Canberrans enjoy visiting Bungendore and Braidwood to experience a sense of colonial history. Development of the new, concrete, two-storey school buildings will indeed overshadow and diminish the heritage values of the historic Bungendore Park precinct.</p> <p>The VIA (Visual Impact Assessment) may consider that “the proposal has been designed to integrate with the existing visual character of the area” but 19th century buildings and new concrete buildings are a bad match, and adding a (flat) tin roof doesn't make the proposed buildings in any way sympathetic to heritage values.</p> <p>p.30 SIA Recommendation:  <i>“Prioritise the selection of native species across the site to better integrate with the existing natural landscape.”</i></p> <p>Much as we value the planting of appropriate native plant species in our town, whoever wrote this obviously has not viewed the existing landscape, which, as would be expected in a heritage precinct, is dominated by exotic species which are well-suited to the Bungendore climate. (Although the ravages of climate change have claimed a number of very old pine trees on the park; therefore care must be taken to plant climate change-ready species.)</p> <p>Native species do not provide the high quality shade experienced under deciduous trees, and they are far more vulnerable to bushfire risk.</p> <p>To maintain the heritage “feel” of the area, it would be far better to plant summer-shading exotic deciduous trees, which also let in the sun in our cold winter months.</p> <p>Also, as mentioned above, the Bungendore Structure Plan 2048 advises that development “maintain the landscaped setting of Bungendore....which combine(s) native and exotic species.”</p> <p>Every effort must be made to retain as many</p>	<p>1886 Gazettal of Bungendore Park itself - which is part of the heritage curtilage of the War Memorial (erected 1922). The War Memorial's architecture (arched) is one of the least common memorial forms in Australia.</p> <p>1848 Byrne's Inn – Turallo Terrace</p> <p>1860 Headmasters Cottage - Gibraltar St., in Primary School grounds. Now the school office.</p> <p>1864 Court House – Gibraltar St. - J. Barnett, architect. In very good condition. Still in use as Police Station. State-listed S170.</p> <p>1864 St. Phillips Anglican Church – Gibraltar St. - Victorian Free Gothic architecture. Of significance to Anglican Church of Australia, including trees and fence.</p> <p>1880 School Building – Gibraltar St. - State-listed S 170</p> <p>1885 Railway Station (also Cottages and Goods Shed) All State Significant Items</p> <p>1888 School of Arts – Gibraltar St - still in use as an arts and performance centre.</p> <p>1891 The Convent – Turallo Terrace – very good condition, connections with St. Mary McKillop</p> <p>1896 Bungendore Post Office – Gibraltar St.</p> <p>1901? Bungendore Common – Turallo Creek environs</p> <p>? Neighbourhood Centre/Pre-School – Turallo Terrace – formerly Catholic School</p> <p>? Early 20 Century - No. 9 Butmaroo St - Timber Miner's Cottage</p>
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		existing trees on site as possible, as mature trees will continue to store carbon.	1969 P.J. Osborne Fountain - corner of Butmaroo and Gibraltar Sts.
6.7	<b>Pedestrian Safety and Access</b>	<p>P.31 Current Environment:          “The Transport Assessment undertaken by GHD for the proposal indicated there is a lack of formal footpaths along Butmaroo Street and Turallo Terrace. The assessment also found there were limited opportunities for safe road crossings in the area that provide priority for pedestrians over vehicles.”</p> <p>The “current environment” in the Gibraltar-Majara-Turallo precinct is already congested and poses safety risks for primary students. Far from improving this situation, the imposition of a high school will exacerbate the congestion, regardless of how many car parking spaces and footpaths are provided. More concrete car parks and footpaths (which will no doubt be followed by concrete kerb and guttering) will sound the death-knell for the remaining, attractive, grassy footpaths and swales which add to the overall historic feel of the area. (This is the kind of detail one would expect in the Heritage Report from EcoLogical, but it is nowhere to be found there.) Grassy verges and swales are essential to counter the heat island effect of the urbanisation of our town. The massive quantity of concrete (and other hard paving surfaces) that are planned for the site will create a heat island where there currently is none, and will cause stormwater which at present soaks helpfully into the soil, to be channelled rapidly down to the creek where it adds to already existing flooding problems and destroys the creek ecosystem. Yet there is no mention of this serious impact on our town.</p> <p>Nor is there any mention of pre-school students! The Bungendore Pre-School is located on Turallo Terrace opposite the current pool site. Mecone does not seem to have taken this into account in any of its findings, which is a very serious omission.</p> <p>The prospect of a pedestrian path which links Gibraltar St.with Turallo Terrace via the oval is strange; does this mean that the public will be able to wander onto the high school campus at any time during the day? Most high schools do not allow the public</p>	Acknowledgement of the presence of pre-school children in the precinct is essential and must be incorporated into any traffic study!

		<p>into the grounds during school hours.  e.g. A dot point at the beginning of p.32 (CPTED principles) mentions the importance of providing separate access to the community facility building “to clearly separate members of the public from school students.”</p>	
6.8	<b>Traffic Generation</b>	<p>Despite “<i>Development of a Transport Plan which aims to decongest the road network around the school through increasing active travel use and enhancing safe travel connections.</i>” (Management Measures, p.33) parents will continue to drive their children to both schools (and to the nearby PreSchool), because, as mentioned above, that is how Bungendore society works. The plan must accommodate this reality. People always take the most convenient course of action. And many students will need to drive themselves or be driven, as the catchment will be very wide.</p> <p>While every effort must be made to encourage young people to exercise as often as possible, cycling on narrow country roads can be dangerous for young inexperienced riders, and on the many school days when “the wind comes off the ice”, which is common for 6 months of the year, the wisdom of cycling to school is questionable.</p> <p>Q: what is an “end-of-trip facility”?  Is it a bike rack?</p>	<p>The Majara-Gibraltar-Turallo site for the BHS is unsuitable because it will make existing traffic congestion even worse. A better site on the outskirts of the town, close to the new or newer housing developments, is required to ensure safety of our primary school and pre-school age children.</p>