



Ms Kate Bimson
Project Director
PYMBLE LADIES SCHOOL
20 AVON ROAD, PYMBLE 2073

13/12/2021

Dear Ms Bimson

Pymble Ladies College - Grey House Precinct (SSD-17424905)

Response to Submissions

The exhibition of the development application including the Environmental Impact Statement for the above proposal ended on 6 December 2021. All submissions received by the Department during the exhibition of the proposal are available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/41666>

The Department requires that you provide a response to the issues raised in the submissions, in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation). Please provide a response as soon as possible and no later than Friday, 11 February 2021.

Please lodge your response by progressing the application on the major projects planning portal <https://majorprojects.planningportal.nsw.gov.au/>.

Please note that Sydney water is yet to provide a response in relation to the application. Any comments or requirements received from this public authority will be forwarded upon receipt. In addition to the issues raised in the submissions, the Department has raised a number of key issues to be addressed (refer **Attachment A**).

Note that the time between the date of this letter and the date the Secretary receives your response are not included in the period of 'deemed refusal', under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*.

If you have any questions, please contact Nahid Mahmud on (02) 99955228 or via email at Nahid.Mahmud@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'KH' followed by a flourish.

Karen Harragon

as delegate for the Planning Secretary

Attachment A–Key Issues

Bulk, scale and visual impact

1. The Department notes that the State Design Review Panel (SDRP) and Ku-ring-gai Council (Council) have raise concerns regarding the overall bulk and scale of the proposed building in the Grey House precinct. The Department agrees with these concerns, especially in relation to the following:
 - The design of the building does not fully address the principles of Schedule 4 of the State Environmental Planning Policy (Educational Establishment and Child Care Centres) 2017 (Education SEPP) in the bulk and scale of the building is not compatible with the low-density character of the dwellings that immediately adjoining the precinct to its south (facing Pymble Avenue).
 - In this regard, the SDRP have advised that the design of the brick podium should be re-considered, as stepping down the brick base to the east appears to intensify the perceived scale of the proposal's four- storey ceramic façade. More horizontal elements should be introduced to tone down the scale.
 - Per the SDRP advice, the five-storey bulk of the proposed development would also alienate the junior school students, who would use the south-eastern part of the site. This impact should be explored further and mitigated to integrate the uses/buildings within the campus.
 - The proposed glazing treatment should be complimented with more horizontal shading strategies to improve daylight and enable access to natural ventilation.
 - The submitted Heritage report states that there is no visual or physical impact of the development on the adjoining heritage item(s). However, the Department considers that a complete assessment of the impacts of the bulk of the proposed building on the adjoining low-density environment and the heritage items, has not been conducted. Please note that the Department is currently conducting an independent heritage assessment of the proposal. Additional information in relation to the heritage impacts of the development may be requested once the assessment is completed.

Amenity Impacts

1. The Department is concerned that the windows of the classrooms within the building would have direct overlooking opportunities to the swimming pool and courtyards of the residential properties to the south (facing Pymble Avenue).

The visual privacy diagrams are unclear and do not demonstrate that measures are proposed to reduce such overlooking opportunities. You are requested to address this issue and provide additional diagrams and/or mitigation measures to demonstrate that adverse visual impacts are reduced where possible.

2. According to the Ku-ring-gai Development Control Plan, a building should be sited to maintain solar access to north facing windows and rear yards of adjoining properties of at least four hours between 9am and 3pm on 21st June. The proposed development does not comply with this requirement. Please address this issue and demonstrate how the development would maintain an appropriate level of solar access to the impacted properties (to its south) during winter solstice.

Traffic Impacts

1. The submitted Transport Impact Assessment report (TAR) (section 9.3 SIDRA assessment) has considered only two signalised intersections (Pacific Highway/Livingstone Avenue and Pacific Highway/Beechworth Road). However, the Department notes that there are several intersections (not signalised) that are located closer to the site and would likely be impacted by increase in traffic movements along Pymble Avenue. These include (but not limited to) Pymble Avenue/Rand Avenue and the roundabout at Avon Road/Everton Road/Pymble Avenue.

Several community submissions have raised significant concerns regarding the impacts of the development on these intersections and the surrounding road network in general. Noting the concerns in the submissions and the nature of the future traffic flow, the Department requires you to undertake SIDRA modelling of the other nearby intersections in close proximity to the location of the Grey House Precinct.

2. The Department notes that the SIDRA analysis concludes that the delays at one of the signalised intersections is currently >70 secs and this would be maintained in the future. This is not considered an acceptable result as it does not provide any details of how much increase of delays at this intersection is expected due to the proposed increase in vehicular movements. You are requested to provide clear figures to indicate how much increase in delays (if any) is expected.
3. The traffic modelling does not consider the ultimate development year plus 10-year background growth of the intersections. It is requested that the TAR should include background growth of the intersections in the 10-year horizon.
4. The proposed development does not include provisions for car parking. The EIS and the TAR state that the aquatic centre (outside of the subject precinct area) includes a number of car spaces, out of which 37 car parking spaces would be utilised for the purpose of the early learning centre (ELC).
5. While the EIS notes that the ELC will operate from 7am to 6.30pm, the aquatic centre closing time has not been mentioned in the EIS (opening time being 9:30am). In the absence of this data, the Department cannot ascertain as to how 37 car spaces would be available for exclusive ELC use in the PM within this centre. Although, the Department acknowledges that 42 students of the ELC are expected to be children of staff and thus not generating the need for parking, this cannot be guaranteed in the future operationally.

You are requested to address this matter in detail and provide a detail profile of usage of the aquatic centre, the ELC and then explain how the proposed shared use of the car parking spaces would be managed in the future so that parents do not park on the nearby streets and then walk to the site.

6. Additionally, the ELC staff would need parking for the entire day. This cannot be provided within the aquatic centre. Please specify the location of the parking spaces for the ELC staff.

7. The location of the disabled car parking spaces is not clear in the submitted plans. The parking spaces would be located about 74m away from the proposed buildings, which is not conducive for the persons with disability. You are requested to address this issue.
8. The pedestrian connection from Pymble Avenue, the Grey house walkway, would be used significantly during operation of the precinct. However, the walkway is very narrow. The TAR does not include an assessment of the pedestrian volume that would use this walkway and whether the current width is suitable for such use. You are requested to address this issue.

Accessibility

1. SDRP have requested that details of accessibility at all levels of the building be provided, noting the massive change of levels within the site.
2. The submitted Building Code of Australia (BCA) report (Table 14) states that a part of the building does not have continuous access pathway which does not comply with AS14.28.1-2009, The submitted BCA report recommends that the Access consultant would address with performance solution. However, the Access consultant's report does not provide any satisfactory comments regarding this issue. You are requested to provide satisfactory details to demonstrate that the building and all of the proposed uses would have satisfactory and accessible connections.
3. The Department notes that the ELC parking would be provided within the aquatic centre. In this regard, you are requested to provide details of an accessible pedestrian pathway (for strollers as well) from the centre to the ELC including shaded paths for the amenity of the future users.

Biodiversity Impact Assessment (BDAR)

1. The submitted BDAR does not include an assessment against the Biodiversity Assessment Method (BAM) 2020.
2. In accordance to the recent amendments to the legislation, any BDAR must include calculations under BAM 2020. The BDAR must be revised to comply with this requirement and address all the requirements raised by the Biodiversity and Conservation group of the Department.
3. The identified Tree 402 is a hollow bearing tree. The submitted Arborist Report does not indicate any details of threatened species habitation within this tree or any impacts due to the proposed development. This matter should be addressed in the revised BDAR and/or Arborist Report.

Delineation of the site area and relationship with the masterplan

1. The Grey House precinct area has not been defined clearly in the EIS. If the precinct is part of the Masterplan of Pymble ladies College, please provide details of inter relationship with the Masterplan, shared parking areas, overall traffic generation, pedestrian connections and shared drop-off/pick-up spaces (if any).
2. The overall Masterplan for the site (prepared in 2019) should be meaningfully tied to the proposed Grey House Precinct plan and landscaping. Further details in this regard should be provided.

Social Impact Assessment (SIA)

1. The SIA report says, there are no sensitive receivers within 500m of the Grey House Precinct. However, there are a number of childcare services, parks and places of worship within this radius. The SIA should include additional assessment of the impacts of the development on these facilities.
2. The SIA does not identify the impacts of the intensification of the use of Grey house walkway on the daily lives of the adjoining and surrounding residents on Pymble Avenue, especially residents at 57, 57(A), 59 and 59B Pymble Avenue.

Details on the plans

You are requested to submit amended floor plans showing the RL and the setbacks of the building from the boundaries.