

## RESPONSE TO SUBMISSIONS

### 3.1 RESPONSE TO AGENCY SUBMISSIONS

This section seeks to tabulate all submissions received from government agencies and provide a detailed response to each matter.

TABLE 1: RESPONSE TO AGENCY SUBMISSIONS			
SUBMITTER	MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
<b>NSW Rural Fire Service</b>	<b>N/A</b>	<p><i>The NSW RFS has no specific concerns with the proposal relating to bush fire protection.</i></p> <p><i>Further consultation with the NSW RFS is not required for subsequent stages of the proposed development.</i></p>	Noted. No further response required.
<b>NSW Environmental Protection Agency</b>	<b>N/A</b>	<p><i>Based on the information provided, the proposal does not appear to require an environment protection licence under the Protection of the Environment Operations Act 1997.</i></p> <p><i>The EPA has no comments to provide on this project and does not require any follow-up consultation. Ku-ring-gai Council should be consulted as the appropriate regulatory authority for the Protection of the Environment Operations Act 1997 in relation to the proposal.</i></p>	Noted. No further response required.
<b>NSW Environment, Energy and Science</b>	<b>BDAR Request Waiver</b>	<p><i>The EIS notes a Biodiversity Assessment has been prepared “to support a BDAR waiver” (Section 7.4, page 112). It includes as a Specific Environmental Commitment for Flora and Fauna that “the requirement for a BDAR under the BC Act should be waived” (page 118). A BDAR waiver request has already been reviewed by EES, and in its submission of 17 August 2021, EES advised the request to waive the requirement for a BDAR is not</i></p>	A BDAR waiver request was made which was rejected and therefore a BDAR accompanied this EIS. This process was included within the EIS for transparency. An updated BDAR has been provided at <b>Attachment F</b> .



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		supported and a BDAR is required. As a BDAR has been prepared to accompany the EIS for this SSD, it is not clear why Sections 7.4 and Part I of the EIS are referring to the requirement for a BDAR to be waived.	
	<b>Number of trees to be removed</b>	<p>The RtS needs to clarify the number of trees that are proposed to be removed as the EIS, BDAR, AIA and Appendix 12 provide differing information in relation to this, for example:</p> <ul style="list-style-type: none"> <li>▪ Section 7.1.1 of the Arboricultural Impact Assessment states “thirty (30) trees would require removal” (page 9)</li> <li>▪ the BDAR indicates a mix of 29 native and exotic trees require removal to facilitate the proposed development including two (2) trees with high retention value, 13 moderate value retention trees and 14 low retention value trees (section 6.1.1 of BDAR)</li> <li>▪ Section 4.7 of the EIS states “29 trees would require removal to facilitate the proposed development” (page 45)</li> <li>▪ Section 6.4 of the EIS states “in total 29 trees would require removal to facilitate the proposed development, including two (2) high retention value trees, 13 moderate value retention trees and 15 low retention value trees”. This equates to 30 trees</li> <li>▪ The Tree Planting Plan in the Landscape drawings (Appendix 12) indicates 27 trees are to be removed.</li> </ul>	<p>The proposed number of trees to be removed is 29 trees, with 25 trees within Vegetation Zone 1 and 4 trees within Vegetation Zone 2. An updated BDAR Report is provided at <b>Attachment F</b>.</p> <p>The 30 trees referenced in the Arborist report are the trees impacted by the proposal, with one tree being able to be retained through tree protection measures.</p>
	<b>Sydney Turpentine-Ironbark Forest</b>	The EIS states “the site comprises a mix of Plant Community Types (PCTs) including two (2) Endangered Ecological Communities (EECs); PCT 1281 - Sydney Turpentine-Ironbark Forest (STIF) and PCT 1237 - Blue Gum High Forest in the Sydney Basin Bioregion (BGHF). Remnant canopy trees of STIF and BGHF are present around the perimeters of the school grounds” (section 6.11, page 98). The Executive Summary of the BDAR notes the proposed development will have an approximate	It is proposed that there will be 0.06ha of land to be cleared associated with the project. Of this, 0.02ha will be impacted for access in the Vegetation Zone 2. This has been rectified in the BDAR at <b>Attachment F</b> .



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		<p><i>impact area of 0.06ha on STIF (page ii) but the Conclusions to the BDAR states the proposed development will have an approximate impact area of 0.02ha on STIF EEC (Section 11, page 47). Based on Section 6.1.1 of the BDAR it appears the building footprint will impact a total of 0.04 ha (page 38) and the accessway will impact 0.02 ha (page 39) which means a total of 0.06 ha will be impacted. The RtS needs to clarify the total impact area.</i></p>	
		<p><i>The Executive Summary of the BDAR states that the “Vegetation onsite has been significantly altered such that the site does not reflect the natural structural attributes of the STIF” and that “Vegetation is structurally and functionally poor due to previous clearing onsite. Thus, the proposed development assessed in this BDAR is not expected to significantly contribute to loss of STIF”. It also states the “majority of vegetation on site is regrowth” or “has been planted by the school” and that “there is little to no remnant vegetation left within the site” (page ii). The RtS needs to clarify if the regrowth is from remnant local native vegetation. Remnant vegetation need not just be remnant trees but can include groundcover and shrub species associated with the plant community and trees that have grown from remnant seedstock.</i></p>	<p>The site has been managed as the Pymble Ladies College since the 1916. The site has a long history of vegetation clearing, habitat fragmentation and on-going disturbance, via development. A majority of vegetation on site is regrowth or has been planted by the school. There is little to no remnant vegetation left within the site.</p>
		<p><i>The Arboricultural Impact Assessment indicates 15 of the subject trees to be removed are native to Australia with eight being endemic to the local area (section 5.3.4) while the EIS notes the proposed development requires the removal of “11 native canopy trees” (Table 6, page 56). This needs to be clarified</i></p>	<p>It is to be noted that the final Arborists Report reference the correct number of native trees that will be removed. The report states that 15 of the removed trees are native to Australia. The overall assessment undertaken in the EIS would not be impacted by this minor error.</p>
		<p><i>The EIS indicates an Arboricultural Impact Assessment (Appendix 25) has been prepared with respect to the 30 trees located within or adjacent to the development area and it</i></p>	<p>It is considered that a majority of the native species would have been planted on site, noting that there are some potential remnant species. The BDAR provides the most</p>



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		<i>notes that “all trees assessed were considered to be planted, not remnant, specimens” (Section 6.4, page 83). This statement is not consistent with the BDAR which considers that “due to the age and structure some individuals within Vegetation Zone 2 (accessway) are expected to be remnant and form part of the original vegetation community (Section 1.2, page 3 of BDAR). The RtS needs to address this inconsistency.</i>	accurate detail. Notwithstanding, the overall assessment undertaken within the EIS would not be changed by this finding.
	<b>Management of STIF</b>	In relation to STIF, the BDAR states “the mid stratum is primarily absent within site boundaries” and the “ground stratum has been highly disturbed, with much of the site dominated by exotic turf grasses and ‘High Threat Exotic’ (HTE) species” (section 3.1.1, page 13). It also indicates that “current management practices are preventing the recovery of the original plant Community” (Section 1.2, page 3) and that “vegetation adjacent to the access path is displaying signs of natural regeneration although this is being hindered by current land use practices (Section 3.1.1, page 13) and “exotic species are dominant across the site and are preventing the recruitment of the original vegetation community” (Section 8.1.2, page 42). EES encourages the removal of exotic species from the school site over time, especially HTE species and replacement with local native provenance species, including groundcover and shrub species and that management practices are modified to assist natural regeneration.	Noted. Any future redevelopment of the wider School site can look towards the removal of exotic species. It is not considered as part of this proposal as it is outside of the site area. Should further removal of exotic species occur on site this will be done in consultation with the relevant agency and consultants.
		<i>EES notes that the school has already been undertaking bush regeneration in the areas of BGHF and STIF and this does not include the proposed development area as this is not bushland (section 3.3.3, page 17 of BDAR). EES encourages bush regeneration of BGHF and STIF on the school site</i>	Noted. This does not form part of the proposed development.



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	<b>Mitigation Measures</b>	<p><b>Pre-clearing of vegetation</b>  <b>Seed collection from local native plants to be removed.</b>  <i>The BDAR recommends that any native trees or shrubs being removed for the construction works should be checked for seeds during removal works and if seeds are present, they should be collected and used (section 10.1.7, page 47). EES agrees that native seed should be collected and recommends the following condition of consent is included: Prior to the removal of any STIF vegetation from the site seed from native trees and shrubs approved for removal is collected and it is propagated by a suitably qualified bush regenerator and used in the site plantings.</i></p>	<p>Noted. Any native trees or shrubs being removed for the construction works should be checked for seeds during removal works. If seeds are present, they should be collected and used. Suitable locations currently exist within the site of Pymble Ladies College currently undergoing bush regeneration activities.</p>
		<p><b>Translocation of juvenile native plants</b>  <i>EES recommends any juvenile local native plants that are proposed to be removed by this SSD should be replanted in the landscaped planting areas. The juvenile plants must be translocated prior to any earthworks and clearing of native vegetation commencing. The plants should be relocated by a suitably qualified bush regenerator when plant growth conditions are ideal to give the native plants the best possible opportunity to survive and should be maintained until established. EES recommends a condition of consent is included to this effect.</i></p>	<p>Noted. This can be conditioned accordingly should DPE consider this appropriate.</p>
		<p><b>Pre-clearance fauna surveys and Relocation of native fauna</b>  <i>The BDAR recommends an ecologist should be present onsite during vegetation clearing to ensure no fauna are harmed as a result of clearing (Section 10.1.4, page 46). EES recommends a condition of consent is included that a suitably qualified and experienced ecologist needs to be engaged by the proponent to undertake pre-clearance surveys: Prior to removing any</i></p>	<p>Noted. This can be conditioned accordingly should DPE consider this appropriate.</p>



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		<p>vegetation or other habitat that has been approved for removal, the applicant must engage a qualified and experienced ecologist to:</p> <ul style="list-style-type: none"> <li>▪ undertake a pre-clearing survey to delineate, map, and mark habitat-bearing trees and shrubs to be retained/removed and other fauna habitat features and determine the presence of any resident native fauna using nests, dreys, hollows, logs etc</li> <li>▪ supervise the clearance of trees and shrubs (native and exotic) and other habitat to capture, treat and/or relocate any displaced native fauna to an appropriate nearby location</li> <li>▪ remove sections of a tree containing a hollow or habitat prior to clearing and felling the tree</li> </ul>	
		<p><b>Replacement nest boxes</b></p> <p>The EIS notes observation of trees from the ground did not indicate the presence of hollows or deep fissures but these may still be present and an ecologist is to be on-site during any tree removal works (section 6.11, page 99). The EIS recommends installing four micro-bat boxes in the trees being retained in this area (page 99) while the BDAR recommends installing three microbat nest boxes within the site boundaries to increase roosting opportunities in the area (sections 8.1.3 and 10.1.8). The number of microbat boxes proposed to be installed on the site needs to be clarified. The number of microbat nest boxes to be installed may need to be more than four depending on the findings of the pre-clearing survey EES recommends a condition of consent is included as follows: • Where hollow dependent native fauna are found using existing hollows, compensatory tree hollows should be provided prior to removing the tree hollows and prior to the release of the hollow</p>	<p>Noted. Three microbat nest boxes are recommended for installation within the site boundaries within the BDAR. This will increase the potential for microbats to roost in the area post development. Native species landscaping across the site is also recommended to increase potential habitat area for the Large eared pied bat (<i>Chalinolobus dwyeri</i>). This can be conditioned accordingly.</p>



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		<p><i>dependent fauna unless the removed tree hollows can be relocated and installed on the same day they are removed.</i></p>	
		<p><b>Clearing of Native Vegetation</b></p> <p><i>If the SSD project is not able to reuse all removed native trees, EES recommends a condition of consent is included that the proponent consults with the local community restoration/rehabilitation groups, Landcare groups, and relevant public authorities including local councils, and Greater Sydney Local Land Services prior to any clearing commencing to determine if the removed trees can be re-used by others in habitat enhancement and rehabilitation work. This detail including consultation with the community groups and their responses should be documented.</i></p> <p><i>EES recommends the project includes the following condition:</i></p> <ul style="list-style-type: none"> <li>• <i>The Proponent must where it is practicable reuse any of the native trees that are to be removed as part of this project, including tree hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), and root balls to enhance habitat:</i> <ul style="list-style-type: none"> <li>○ <i>Any hollow sections of wood removed should be salvaged and re-located to appropriate locations to provide natural nest boxes prior to the release of any native fauna found using the tree hollows.</i></li> <li>○ <i>If removed native trees are not able to be entirely re-used by the project, the proponent should consult with local community restoration/rehabilitation groups, Landcare groups, and relevant public authorities, local councils, and Greater Sydney Local Land Services prior to removing any native trees to determine if the removed trees can be reused in</i></li> </ul> </li> </ul>	<p>Noted. This can be conditioned accordingly should DPE consider this appropriate.</p>



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		<p><i>habitat enhancement and rehabilitation work. This detail including consultation with the community groups and their responses must be documented.</i></p>	
		<p><b>Revegetation and Landscaping</b>  <i>Section 3.6 of the EIS notes canopy trees would be planted adjacent to the site boundary, to compensate for the trees requiring removal and adjacent to the building facades and outdoor learning areas (page 37). It also indicates that “bush regeneration programs and management zones (refer Figure 23), have already been commenced by the College in the areas of BGHF and STIF (this does not include the Grey House Precinct as it is not bushland) and that the ongoing rehabilitation of BGHF and STIF in other appropriate locations across the site in accordance with the draft Vegetation Management Plan (VMP), would mitigate the tree removal (11 native canopy trees)” (Section 6.11, page 100). EES has not received the draft VMP for review to determine if the draft VMP does mitigate the tree removal.</i></p>	<p>A draft Vegetation Management Plan (VMP) was not considered necessary to be included in the BDAR. A VMP can be conditioned should it be considered appropriate by DPE.</p>
		<p><b>Tree replacement ratio</b>  <i>The EIS recommends offset planting is undertaken which corresponds with the number of trees removed (section 6.4). The Tree Planting Plan in Appendix 12, however proposes to plant 37 trees for the 27 trees to be removed. The RtS needs to clarify the proposed number of trees to be removed and the proposed number of replacement trees.</i></p>	<p>It is proposed as stated previously that 29 trees will be removed. It is proposed that there will be 37 medium to large trees planted to replace the trees lost which will account not only to replace the trees lost but ensure there is more vegetation introduced into the area.</p>
		<p><b>Use of local native provenance species</b>  <i>The BDAR recommends “native species landscaping across the site to increase potential habitat area for the Large eared pied bat (Chalinolobus dwyeri)” (section 8.1.3, page 43) and that post</i></p>	<p>Currently there is no bush in the site to be regenerated but we are proposing establishing BGHF community planting along the southern boundary to link to the bushland to the South West of the site. Therefore the trees only along that</p>





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		<p>construction bush regeneration management is undertaken to ensure recovery of 0.02 ha of STIF and to improve the surrounding STIF vegetation (section 8.1.4, page 43). Further details are required on the proposed STIF bush regeneration as the Landscape Drawings - Proposed Plant Schedule proposes to plant 37 trees, and of these 14 are identified as BGHF species while the remaining trees are non-local native species such as Lemon Scented Myrtle (<i>Corymbia citriodora</i>) and exotic species such as Indian Bean Tree, Jacaranda, Tulip Tree and Japanese Elm.</p>	<p>boundary have been proposed as BGHF species, the understory planting in these areas are also from the BGHF community. We would support the involvement of a bush regenerator/ecologist to ensure that the actual planting arrangement and establishment works to create habitats which could include mounting of bat boxes until the proposed trees are large enough to provide the support for bats or other fauna. Integration of deadwood and rocks within the planting would also aid in habitat creation for insects.</p>
		<p>EES recommends the landscape planting schedule is revised by a qualified bush regenerator and the planting schedule uses a diversity of local provenance native species from the relevant native vegetation community (or communities) that occur, or once occurred on the site (rather than use exotic species or non-local native species).</p>	<p>The other planting typologies include some non-native species to ensure solar access and seasonal change as well as connecting to the wider campus tree planting strategy. The Northern part of the site has a planting palette that ties into the PLC campus heart which has a more formal and manicured characteristic. The ELC planting looks to use a mix of native and non native species to create an immersive sensory experience for the children.</p>
		<p>If the SSD is approved, EES recommends the following conditions of consent are included:</p> <ul style="list-style-type: none"> <li>Any planting/ landscaping, rehabilitation associated with the project shall use a diversity of local provenance native trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community (or communities) that occur or once occurred along the rail alignment / local area where agricultural plantings are not required.</li> <li>Tree planting shall use advanced and established local native trees with a minimum plant container pot size of 100 litres, or greater for local native tree species which are commercially available. Other local native</li> </ul>	<p>Noted. This can be conditioned accordingly should DPE consider this appropriate.</p>



**RESPONSE TO SUBMISSIONS REPORT**

Pymble Ladies College – Grey House Precinct  
20 Avon Road, Pymble (Lot 1 DP 69541)

SSD-17424905

**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

SUBMITTER	MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
		<p><i>tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed. · Enough area/space is provided to allow the trees to grow to maturity.</i></p> <ul style="list-style-type: none"> <li>• <i>A Landscape Plan is to be prepared and implemented by an appropriately qualified bush regenerator and include details on:</i> <ul style="list-style-type: none"> <li><i>a. seed collection – the location of all native seed sources should be identified</i></li> <li><i>b. the type, species, size, quantity, and location of replacement trees</i></li> <li><i>c. the species, quantity and location of shrubs and groundcover plantings</i></li> <li><i>d. the plan demonstrates replacement trees plantings will deliver a net increase in trees for trees that are not covered by a biodiversity offset strategy</i></li> <li><i>e. the native vegetation community (or communities) that once occurred in this area are to be planted and the plan demonstrates that the plant species consist of local provenance</i></li> <li><i>f. a list of local provenance species to be used g. the quantity and location of plantings</i></li> <li><i>h. the pot size of the trees to be planted</i></li> <li><i>i. the area/space required to allow the planted trees to grow to maturity</i></li> <li><i>j. plant maintenance regime. The planted vegetation must be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species.</i></li> </ul> </li> </ul>	



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<b>Heritage NSW</b>	<b>N/A</b>	<p><i>The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no further heritage comments are required.</i></p> <p><i>The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW. As the site is in the vicinity of a conservation area and several locally listed properties, advice should be sought from the relevant local council</i></p>	Noted. No further response or consultation with Heritage NSW is required.
<b>Sydney Water</b>	<b>Water Servicing</b>	<ul style="list-style-type: none"> <li>• Potable water servicing should be available via a 100mm C/CL watermain (laid in 1914) on Avon Road.</li> <li>• Amplifications, adjustments, and/or minor extensions may be required.</li> </ul>	Noted. Should adjustments be required these will be undertaken prior to occupation of the development in consultation with Sydney Water.
	<b>Wastewater Servicing</b>	<ul style="list-style-type: none"> <li>• Wastewater servicing should be available via a 225mm EW wastewater main (laid in 1939) within the property boundary.</li> <li>• Amplifications, adjustments, and/or minor extensions may be required.</li> </ul>	Noted. Should adjustments be required these will be undertaken prior to occupation of the development in consultation with Sydney Water.
<b>Transport for NSW</b>	<b>Green Travel Plan Objectives</b>	<p><b>Comment:</b> TfNSW notes the objectives of a GTP provided in the TIA, however, advises when preparing a GTP, measures must ensure that non-private vehicular modes of transport are the preferred mode of travel to / from the development.</p> <p><b>Recommendation:</b> The GTP should include objectives to reduce the proportion of single-occupant car travel by staff and visitors to and from the site and increase the mode share of public transport and active transport for the life of the development. These objectives need to be met within the school's Implementation Strategy and Implementation Plan initiatives,</p>	Noted. The Green Travel Plan (GTP) has been amended to include implementation strategies to increase the use of active transportation by students. Refer to Section 7.3.1 of the GTP ( <b>Attachment D2</b> ).



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		taking into consideration the TfNSW proposed mode share table below																						
	<b>Mode Share Targets</b>	<p><b>Comment:</b> TfNSW appreciates that the TIA provides mode share tables to identify and provide existing and future mode share targets for staff and students to take active and public transport travel to and from the site.</p> <p><b>Recommendation:</b> Given the very close proximity of the site to trains, buses and pedestrian routes, TfNSW has proposed the below mode share table for the site, aiming to reduce single occupancy car use and promote active and public transport, supported by more ambitious strategies and initiatives to achieve these goals. Please also consult our website Travel Plan Toolkit and Travel Plan template for further information.</p> <table border="1"> <thead> <tr> <th>Travel Mode (staff and students)</th> <th>Stantec proposed mode share</th> <th>TfNSW proposed mode share</th> </tr> </thead> <tbody> <tr> <td>Vehicle (as driver)</td> <td>61%</td> <td>50%</td> </tr> <tr> <td>Vehicle (as passenger)</td> <td>3%</td> <td>10%</td> </tr> <tr> <td>Train</td> <td>29%</td> <td>35%</td> </tr> <tr> <td>Bus</td> <td>2%</td> <td>5%</td> </tr> <tr> <td>Walking and Cycling</td> <td>5%</td> <td>10%</td> </tr> <tr> <td>Other</td> <td>1%</td> <td>0%</td> </tr> </tbody> </table>	Travel Mode (staff and students)	Stantec proposed mode share	TfNSW proposed mode share	Vehicle (as driver)	61%	50%	Vehicle (as passenger)	3%	10%	Train	29%	35%	Bus	2%	5%	Walking and Cycling	5%	10%	Other	1%	0%	<p>The proposed mode share within the Green Travel Plan is provided within Section 6.1, however the table provided by TfNSW does not reflect this.</p> <p>The proposed mode share differs between pick up and drop off, being car dominant with approximately 55%, public transport/ private bus resulting in around 36% and walking or other means at 9% of the mode share. The GTP provides short and long term targets to increase active and public transport and reduce car dominance. These measures are considered appropriate given the use of the site as a School facility. No further condition is considered to be required.</p>
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	<b>Travel Guide Access</b>	<p><b>Recommendation:</b> TfNSW requests that a separate Travel Access Guide (TAG) be placed as an appendix in the GTP. The TAG should include separate route maps of all modes of</p>	<p>The GTP Section 8.2 states that a TAG will be provided. <b>(Attachment D2).</b></p>																					



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		<p>transport; buses (private and public), trains, walking, as well as times for these public transport options. The TAG should also:</p> <ul style="list-style-type: none"> <li>▪ Include a map and key messages/rules around the Kiss and Drop zone rules for parents and students.</li> <li>▪ Provide information advising students and staff that additional information about service routes and timetables for buses and trains is available on the Trip Planner at <a href="http://transportnsw.info/">transportnsw.info/</a></li> <li>▪ Provide information advising students that additional information about walking routes is available on the Trip Planner at <a href="http://transportnsw.info/">transportnsw.info/</a></li> <li>▪ Update number and location of End of Trip facilities (showers, lockers, change rooms) and locate on map.</li> <li>▪ For further helpful information – please check this link <a href="#">How to Create a Travel Access Guide doc here</a></li> </ul>	
	<p><b>Monitoring and Measuring the Green Travel Plan</b></p>	<p><b>Comment:</b> TfNSW appreciates the surveys provided in the GTP and would request annual travel questionnaire surveys should be undertaken with a focus to establish travel patterns including mode share of trips to and from the site. These surveys should be undertaken every year and when future transport upgrades take place.</p> <p><b>Recommendation:</b> To further help monitor and measure the increase in public transport use, TfNSW suggests:</p> <ul style="list-style-type: none"> <li>▪ An additional weekly report of patronage using Opal data to and from the school (as well as data from private bus companies running additional buses).</li> <li>▪ Traffic volumes can also be assessed on the road network within the school area, before and after school. These could be monitored to assess whether: <ul style="list-style-type: none"> <li>o Students and staff are re-moding private vehicles to buses.</li> <li>o Traffic volumes during peak hours had reduced.</li> </ul> </li> </ul>	<p>An annual travel questionnaire can be conditioned if considered appropriate by DPE.</p> <p>The relevant data from TfNSW would be required to assist in monitoring the traffic volumes and can also be included in the yearly reporting.</p>



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SSD-17424905

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SUBMITTER	MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<b>End of Trip facilities (EOT)</b>	<b>Comment:</b> TfNSW notes that the GTP does not include any details of end of trip facilities. It is recommended that the locations of the end-of-trip facilities such as bike racks, showers, lockers and change rooms should be promoted in the Travel Access Guide (TAG). This will enable staff and students to store their teaching material/resources and exercise gear in a safe and secure location. Given the hotter temperatures in summer, TfNSW recommend the proposed numbers of showers to be 4 showers and 2 change rooms (total). This would mean 2 x showers plus 1 x change room for staff and the same amount for students.	End of Trip facilities are provided in the form of change rooms, lockers and showers located in the students gym facilities. It should be noted that the GHP is a proposal centered in one section of the school and End of Trip facilities are provided throughout the school, mainly in the swim centre located directly next to the GHP.
	<b>Pedestrian Walking</b>	<b>Comment:</b> Whilst TfNSW understands there is good walkability for students and staff walking to school, and this has been placed into the TfNSW proposed mode share, this will be reliant on the safe management of all the pedestrian pathways to and from the school. Further detail in the Implementation Plan is required on how and when these actions will be taken and by whom.	A Travel Action Plan is provided in the GTP to assist in promotion of sustainable transport options ( <b>Attachment D2</b> ).
	<b>Implementation Strategy</b>	<b>Recommendation:</b> TfNSW appreciates the substantial work done on the GTP in the College-led initiatives. TfNSW recommends that this document is re-named to be called Implementation Strategy, which has a separate implementation plan of tasks and actions (rather than actions), including all the College-led initiatives and incentives (listed below), timing and completion dates. The implementation plan should include your communications tasks, and who will do the tasks. TfNSW recommends that key opportunities as initiatives or incentives (as actions) are listing within your Implementation Plan. The idea of Travel Plan Committee is encouraged here to make sure these actions are completed. Tightening up the	Noted. The Green Travel Plan has been amended to include implementation strategies to increase the use of active transportation by students. Refer to Section 7.3.1 of the GTP ( <b>Attachment D2</b> ).



**RESPONSE TO SUBMISSIONS REPORT**

Pymble Ladies College – Grey House Precinct  
20 Avon Road, Pymble (Lot 1 DP 69541)

SSD-17424905

**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

SUBMITTER	MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
		<i>Implementation Plan with these steps will ensure the overall effectiveness of the GTP. This implementation plan should be updated both on an annual basis, and when future transport services and pathways eventuate. The GTP section on Partnerships can also be put into the Implementation Plan with as part of your stakeholder engagement strategy would be included in this.</i>	

