URBIS

Response to Submissions

SSD-79146716 Pymble Ladies' College Secondary Innovation Precinct and Campus Commons

December 2025
Prepared for: Pymble Ladies' College

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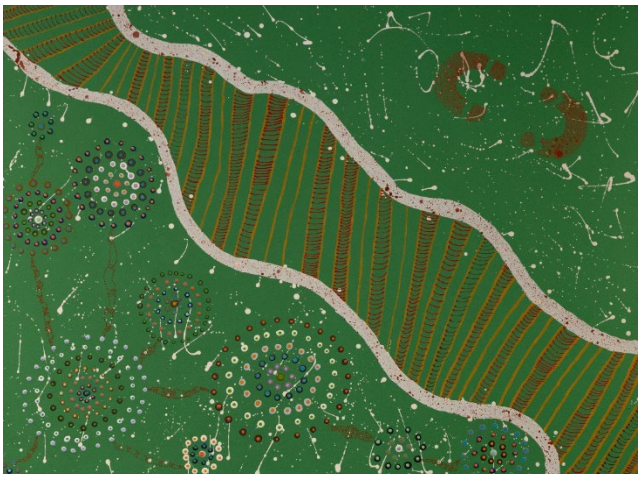
Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.
We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.
We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork - **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Contents

Figures

Executive Summary

This Response to Submissions Report (**RTS Report**) has been prepared on behalf of Pymble Ladies' College (**the applicant**) to address the matters raised by government agencies, Ku-Ring-Gai Council, the community and relevant stakeholder groups during public exhibition of the proposed development at 20 Avon Road, Pymble.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in accordance with the *Environmental Planning & Assessment Act 1979* and *State Environmental Planning Policy (Planning Systems) 2021*.

DPHI issued a letter to the Applicant on 25 August 2025 requesting a response to the issues raised during the public exhibition of the application as well as additional matters requiring further clarification. The following specific matters were identified by DPHI in their Request for Additional Information:

- Tree removal.
- Biodiversity.
- Built form and urban design, including visual impact.
- Car parking.
- Cumulative impact assessment
- The description of the development site.
- BCA compliance.

Other matters raised by other agencies have been addressed throughout this Report and can be found detailed in Section 4.

This RTS Report outlines the minor refinements and clarifications made to the proposed development and responds to all matters raised within submissions.

Overview of Submissions

The SSDA was on public exhibition between 8 July 2025 and 6 August 2025. The following government agencies provided a submission on the project:

- Ku-ring-gai Council (**Council**)
- Transport for NSW (**TfNSW**)
- Heritage NSW
- Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation (**DCCEEW CPHR**)
- Rural Fire Service (**RFS NSW**)
- Fire & Rescue NSW (**FR NSW**)
- Sydney Water

It is noted that Ku-ring-gai Council objected to the proposal, however all other government authorities, agencies or service providers provided comment and/or recommendations in relation to the SSDA.

A total of 2 public submissions were received from individuals, both of which objected to the proposal.

The key issues raised in the submissions can be broadly grouped into the following categories:

- Impacts of the proposal on the adjoining Blue Gum High Forest and related matters involving tree removal, retention and planting.
- Impacts on amenity for residential dwellings on Avon Road, including in relation to bulk and scale, visual impact and privacy.
- Environmental impacts associated with the proposal, including water management, noise generation and contamination.
- Impacts of temporary car parking and demountable provision.

Since only a small number of submissions were received, this Submissions Report provides a response to each individual submission within **Section 4**.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited in early 2025, the Applicant has undertaken further consultation with the DPHI and Ku-Ring-Gai Council to discuss the matters raised within their relevant submissions.

In response to the key issues raised within the submissions, design refinements have been made to the proposed development since public exhibition.

Table 2 summarises the additional consultation that has been undertaken since public exhibition of the SSDA. This table also summarises the outcome(s) of this engagement, and how the amended proposal has responded to the matters raised within the submissions. A full list of updated technical assessments and revised modelling (where relevant) is provided within **Table 1**.

Response to Submissions

The Applicant has amended the proposal in response to the submissions and stakeholder consultation. The key changes are summarised as follows:

- Refinements and clarifications to landscape design, including tree removal and planting, and deep soil details.
- Refinement of the materiality of the rooftop plant enclosure louvres.
- Clarification on and justification of decisions relating to building location, massing, footprint and materiality with reference to the adjoining Blue Gum High Forest and significant trees.
- Further tree surveys and modelling to demonstrate that the proposed development will have minimal visual and privacy impacts on the residential dwellings on Avon Road.
- Clarification on the requirements, impacts and planning pathways for temporary car parking and demountables within the campus.

Updated Justification and Evaluation

The response to submissions process has resulted in minor design refinements and report clarifications, without material changes to the Project. The Project continues to align with State,

Regional and local strategic plans, as well as comply with all relevant National, State and local legislation which must be complied with for a project of this nature.

No significant environmental, social and economic impacts will result from the Project. Residual impacts can be minimised, mitigated and/or offset where necessary.

Therefore, having considered the above, the Project continues to be appropriate for the development site and broader campus setting.

1 Introduction

This Response to Submissions Report (**RTS Report**) relates to a State Significant Development Application (**SSDA**) for the Secondary Innovation Precinct (**SIP**) and Campus Commons (the **development site**) at the Pymble Ladies' College campus at 20 Avon Road, Pymble (**the site**). On behalf of Pymble Ladies' College (**the Applicant**), this Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

The State Significant Development Application was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in June 2025 (SSD-79146716). The SSDA was placed on public exhibition for 28 days between 8 July 2025 and 6 August 2025.

This Submissions Report has been prepared in accordance with the DPIE *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021.*

1.1 Exhibited Project

The SSDA seeks consent for:

- Demolition of the existing Isabel McKinney Harrison Centre, Dorothy Knox, John Vicars and Robert Vicars Buildings.
- Tree removal.
- Excavation of the basement level.
- Construction of the new five storey plus basement SIP building of RL 146.98m and including: General Learning Spaces, STEM teaching spaces, Senior student facilities, Function spaces, food and beverage facilities, associated amenities, storage and building services.
- Undertaking bridging, connection, and minor interface works to support retained buildings that are linked to those proposed for demolition.
- One loading space within the basement (for service vehicles), accessible from the existing rear vehicle service road.
- Minor kerb realignment of the existing access road to the east of the SIP.
- Service infrastructure provision.
- Landscaping on the outdoor terraces and surrounding the building.
- The Campus Commons, a significant garden lawn and amphitheatre connecting the SIP precinct to the rest of the campus.

No student or staff increase is proposed as part of this application

1.2 Supporting Documentation

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Updated Mitigation Measures	Urbis

Appendix	Report	Prepared By
Appendix B	Architectural Plans	3XN
Appendix C	Architectural RTS Response	3XN
Appendix D	Landscape Design Report	TCL
Appendix E	Landscape RTS Response	TCL
Appendix F	Arboricultural Impact Assessment	Tree Survey
Appendix G	Biodiversity Development Assessment Report	Narla Environmental
Appendix H	Vegetation Management Plan	Narla Environmental
Appendix I	Visual Impact Assessment Addendum	Urbis
Appendix J	Traffic Impact Assessment	Urbis
Appendix K	Preliminary Construction Traffic Management Plan	Urbis
Appendix L	Water Management Plan	BG&E
Appendix M	Flooding Statement	Arup
Appendix N	Acoustic Assessment	Pulse White Noise Acoustics
Appendix O	Aboriginal Cultural Heritage Assessment Report and Cover Letter	Artefact
Appendix P	Fire Engineering Review	Jensen Hughes
Appendix Q	Structural Engineering Statement	Arup
Appendix R	Biophilia Paper SIP and Campus Commons	TCL

2 Analysis of Submissions

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

The SSDA was publicly exhibited between 8 July 2025 and 6 August 2025. There were 7 submissions received from public agencies and the local Council, and 2 submissions were received from individuals. All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-79146716).

2.1 Council and Agency Submissions

A total of seven (7) submissions were received from public agencies during the public exhibition of the SSDA. The following agencies made submissions during the exhibition period:

- Ku-ring-gai Council (**Council**)
- Transport for NSW (**TfNSW**)
- Heritage NSW
- Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation (**DCCEEW CPHR**)
- Rural Fire Service (**RFS NSW**)
- Fire & Rescue NSW (**FR NSW**)
- Sydney Water

In addition, on 25 August 2025 DPHI issued a Key Issues Letter which identified several matters which require a proponent response.

Of the 7 submissions received, 1 objected to the proposal (Ku-ring-gai Council), 3 provided comments on the proposal (Heritage NSW, DCCEEW CPHR & Sydney Water), and 3 supported the proposal with no further comments (TfNSW, RFNSW & FR NSW).

Since only a small number of submissions were made, a response to each individual submission is included within the Response to Submissions at **Section 4**.

2.2 Public Submissions

Overall, two (2) submissions from member of the public were received during the exhibition. Both submissions were received from individuals within the suburb of Pymble and both objected to the proposed development. The key issues raised in the submissions centred around building bulk and scale, visual impact, tree removal, construction noise and traffic impacts, and the appropriateness of the development site for the proposed development.

3 Actions Taken Since Exhibition

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the minor refinement that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 3**.

3.1 Further Engagement

Since the SSDA was publicly exhibited in early 2025, the Applicant has undertaken further consultation with the DPHI and Council to discuss the matters raised within their relevant submissions.

The following table summarises the additional consultation that has been undertaken since public exhibition of the SSDA. The table below also summarises the outcome(s) of this engagement, and how the amended proposal has responded (where relevant).

Table 2 Summary of Further Engagement

Stakeholder	Further Engagement	Outcome / Project Response
State Design Review Panel (SDRP)	An online meeting was held with the DPHI on **4 September 2025** to discuss the key issues letter. Discussion focussed on the building siting, tree removal and the requirement to demonstrate that biodiversity impacts were avoided and minimised through the building siting. Urbis sought clarification concerning the request for additional visual impact assessment, the assessment of cumulative impacts, comments concerning BCA non compliances and the status of Council's submission as an objection. Representatives from DPHI and Urbis (Planning) attended this meeting.	DPHI provided feedback which has informed the project response in this RTS: ▪ The constraints that have informed the project location within the college and the building siting are described in this RTS, demonstrating the potential adverse impacts arising if the building location were to shift within the campus. This exercise confirmed that the proposed location is the most suitable for the development. ▪ Trees to be retained were reviewed to determine if additional measures were required to ensure tree retention was successful. ▪ Additional tree survey and visual analysis has been completed to demonstrate that the proposal will not be highly visible from Avon Road. ▪ The potential for cumulative impacts has been reviewed, taking into consideration supporting parking required within the campus for construction. ▪ The fire engineering statement submitted with the RTS provides potential preliminary solutions for

Stakeholder	Further Engagement	Outcome / Project Response
		BCA non compliances which will be fully resolved during detailed design. In addition to design related matters, the status of Council's submission as an objection was also discussed with DPHI, to confirm that the pathway for the determination of the project would be by the Independent Planning Commission (IPC).
Ku-Ring-Gai Council	An online meeting was held with Council on **29 September 2025** to discuss the matter raised in the Council submission of objection. Attendees from Urbis (Planning), the project manager, the applicant and the design team were also present at this meeting. .	A detailed response package was issued to Council on 26 September 2025. This package included: ▪ Further rationale and explanation for the building siting to address concerns about tree removal, including demonstrating the impact that retaining trees specifically identified by Council as being of concern would have on the built form, efficiency of the building and ability to deliver the required program. ▪ Explanation of additional tree survey work that has been undertaken in the area north of the development site location to establish the extent of visual screening provided by vegetation that will be retained. Council provided guidance concerning the inclusion of certain species within the landscape plans. As a result, TCL has reviewed the plans and taken out species identified by Council as not being preferred within the local area. Council provided email advice dated 1 October 2025 confirming they had no questions following the meeting or regarding the presentation material and would not be providing feedback.

3.2 Refinements to the Project

Minor refinements and clarifications have been incorporated into the proposal since public exhibition in response to submissions made. Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required. These design refinements include:

- Minor landscaping amendments, including additional replacement tree planting. A total of 61 replacement trees will be planted.
- Removal of one (1) additional tree within the project area which has been identified as a weed species. A total of 127 trees will be removed, and 8 trees will be retained (within the area included within the landscape plans scope).
- Change in materiality of the rooftop plant enclosure louvres from dark grey to light silver.
- Clarification regarding the approach to construction parking on the site, with the 'Under the Pines ' parking area removed from the proposal, and additional construction parking spaces identified on the south-east side of the oval, within the Kelso car park and on an internal access road.

Refer to the revised Architectural Plans (**Appendix B**) and Landscape Design Report (**Appendix D**) for further details on the design refinements made since public exhibition.

3.3 Additional Impact Assessment

Revised impact assessments have been prepared to respond to the matters raised within the submissions. The key matters that have been subject to further assessment are:

- Biodiversity and landscaping.
- Visual assessment.
- Tree removal/ retention.
- Building location and built form analysis.
- Traffic, transport and access.

This has resulted in updates to the following technical reports and plans and /or the completion of additional impact assessments:

- Revised Architectural Plans (**Appendix B**)
- Architectural RTS response (**Appendix C**)
- Revised Landscape Design Report (**Appendix D**)
- Landscape RTS response (**Appendix E**)
- Revised Arboricultural Impact Assessment (**Appendix F**)
- Revised Biodiversity Assessment Report (**Appendix G**)
- Vegetation Management Plan (**Appendix H**)
- Visual Impact Assessment Addendum (**Appendix I**)
- Revised Transport Impact Assessment (**Appendix J**)
- Revised Preliminary Construction Traffic Management Plan (**Appendix K**)
- Revised Water Management Plan (**Appendix L**)
- Revised Flooding Statement (**Appendix M**)
- Revised Acoustic Assessment (**Appendix N**)
- Revised Aboriginal Cultural Heritage Report and cover letter (**Appendix O**)
- Revised Fire Engineering Review (**Appendix P**)

- Structural Engineering Statement (**Appendix Q**)
- Biophilia Paper SIP and Campus Commons (**Appendix R**)

The findings and recommendations of the additional assessments are discussed in more detail within **Section 4** of this report.

4 Responses to Submissions

This section provides a detailed summary of the Applicant's response to the issues raised in submissions. The response has been structured according to the categorisation of issues outlined in **Section 2**.

Since only two submissions were received during the public exhibition process, a response to each is included in **Table 3**.

Table 3 Response to Submissions Table

Summary of Issue Raised	Response	Supporting Document
NSW Department of Planning, Housing and Infrastructure		
Biodiversity Impacts to Critically Endangered Ecological Communities (CEEC) The Biodiversity Development Assessment Report (BDAR) has not demonstrated that impacts on Blue Gum High Forest (BGHF), a CEEC, have been avoided and minimised in accordance with the Biodiversity Assessment Method (BAM), which requires consideration of reasonable and feasible alternatives. Retention of highly significant trees 61, 71 and 85 must be properly considered in line with recommendations provided by CPHR and Council. Recommended revised setbacks to retain and avoid impacts on BGHF trees are supported by the Department.	An updated Biodiversity Development Assessment Report has been prepared by Narla Environmental (**Appendix G**) which details how the proposal has considered reasonable and feasible alternatives to minimise impacts on the Blue Gum High Forest. The location of the proposed building was selected as it is a previously built and managed area of the College campus and development in this location would minimise ecological disturbance and avoid the clearing of intact native vegetation. Narla notes that the proposed location represents the portion of the campus with the lowest ecological sensitivity and the greatest capacity to accommodate new built form while maintaining existing campus services and circulation networks. Importantly, all 171 trees in the Blue Gum High Forest north of the service road, as well as all habitat trees, will be retained as part of the proposed development. Four alternative building locations were tested to determine whether impacts on the BGHF could be reduced, particularly in relation to the retention of Trees 61,71 and 85. However, the options tested resulted in increased ecological and infrastructure impacts compared to the proposed location of the SIP, as summarised below (refer also **Appendix C** and **Appendix Q**): ▪ Shifting the building to the northeast or southeast resulted in: – Encroachment of the building on the main oval which is an essential facility for the College. – Impact on the Gate 1 ring road which is an essential access point for drop-off and pick-up for the College. Impacts to the functionality of this would result in traffic impacts on local roads. – Requirement for increased excavation due to the topography of site.	Appendix C, D, G & P

Summary of Issue Raised	Response	Supporting Document

  - Requirement for the removal of additional significant mature trees (e.g. T4, T10, T23 and others), resulting in similar or worse biodiversity impacts.

- Shifting the building to south resulted in:
  - Adverse impacts to the operation of the Gate 1 ring road with resultant traffic impacts on local roads.
  - Encroachment on the Colonnade Building and Flagpole Lawn which hold cultural and historical significance to the College.
  - Requirement for increased excavation due to topography of site.
  - Retention of trees T61 and T71 would still not be possible.
- Relocating the SIP to the footprint of existing buildings to be demolished resulted in:
  - Encroachment on the Colonnade Building and Science Building, impacting access.
  - Increase in building height due to site levels, or increased excavation.
  - Loss of vehicular access for loading dock and inadequate space for fire truck access.
  - Retention of trees T71 and T85 would still not be possible.

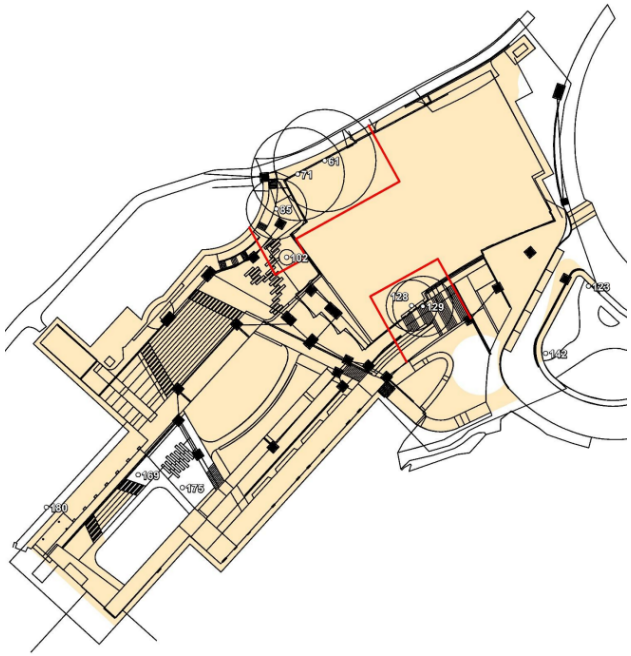
Additionally, any relocation of the building further to the east or southeast will require permanent relocation of existing utility services and an existing access road. Therefore, there is no viable option to relocate the proposed development in order to retain the identified significant trees and avoid impacts on the BGHF.

Alternative scenarios involving a reduced building footprint have also been explored in order to retain Trees 61, 71 and 85, however this would entail extensive building redesign which would not achieve the project goals or intended design outcome. A Tree Setback Plan (see **Figure 1**) has been prepared by Tree Survey which demonstrates the extent of the encroachment of the Tree Protection Zones / Nominal Root Zones of these trees by the proposed building footprint. Retention of these trees, as well as additional trees identified

Summary of Issue Raised	Response	Supporting Document

by Ku-ring-gai Council, would necessitate the removal of approximately 38% of the SIP's gross floor area (GFA). Amending the building design to accommodate retention of these trees would require significant changes to the floorplate which would fail to meet the school's operational requirements and compromise circulation, and fire safety. It would also have significantly spatial impacts on key facilities such as the auditorium, bathrooms, and green roof, as demonstrated in the diagrams prepared by 3XN at **Appendix C**.

Figure 1 Tree Retention Setback Plan



Source: Tree Survey

Figure 1 shows that the redesign of the SIP to retain trees 61,71 and 85 would be impractical and would not deliver the functional, safety, and environmental outcomes essential to the

Summary of Issue Raised	Response	Supporting Document
	project. The College and project team consider that it has been robustly demonstrated that the proposed site location and building form is the most feasible footprint to deliver the project aims and minimise overall site disturbance. Additionally, the BDAR outlines a number of mitigation measures which will be implemented to minimise impacts on the BGHF, including preparation of a Vegetation Management Plan and Construction Environmental Management Plan, tree protection measures, erosion and sediment controls, amongst others. Three ecosystem credits will also be secured through the Biodiversity Offsets Scheme.	
BDAR assessment compliance with Biodiversity Assessment Method (BAM) The BDAR contains inconsistencies with the BAM, including an executive summary that understates impacts to PCT 3136 and limited microhabitat/habitat constraint detail. Mitigation measures for impacts on fauna need to be updated as recommended by CPHR.	The BDAR has been updated to include an accurate description of the impacts to PCT 3136 and further detail about microhabitat features in the executive summary. The BDAR has also been updated to include additional mitigation measures including pre-demolition microbat surveys, pre-clearing surveys and reuse of trees with salvageable habitat features such as hollows. These measures have also been incorporated into the updated Vegetation Management Plan.	Appendix G
Arboricultural assessment and TPZ/SRZ encroachments Major encroachments into TPZ/SRZ are predicted for some trees proposed to be retained, without root mapping or construction methodology to demonstrate viable retention.	Encroachments into the TPZ/SRZ of trees T123, T142, T175, T169, and T180 are proposed, and these trees are proposed to be retained (it should be noted that within the updated Arboricultural assessment the extent of encroachment has been downgraded from 'major' to 'moderate' in accordance with AS4970). To manage this and ensure viable retention, levels within the SRZs of these trees will be maintained or built up. In areas where the base of the existing tree is below the proposed RL, a tree collar will be used to ensure the base of the tree is kept free of soil. The soil media specification and installation methodology will be confirmed with the arborist to ensure high aeration, low compaction and biological activity for tree health. Preferred soil types and details of the proposed tree collars are outlined in the Landscape RTS Response prepared by TCL (**Appendix E**). Specifications and	Appendix E & Appendix F

Summary of Issue Raised	Response	Supporting Document
	details of paving within these areas will be finalised following development approval in the detailed design phase to minimise compaction. The proposed methods for retention and associated mitigation measures for the identified trees are outlined below. It is also important to note that all of the identified trees are hardy species, often used for urban street tree plantings on council verges (between road, kerb, and pathways) and are therefore highly suitable for planting within a highly trafficked school environment. ▪ **T123 & T142**: The proposed works will involve removing existing structure and reconfiguring the road. Additional impacts and encroachment within the TPZ will be negligible. ▪ **T169 & T175**: The proposed works will involve removing some existing structures and installing new hardscapes/landscapes within the TPZ. Soil levels within the TPZ will need to be raised, but this will be managed by using a free/draining aggregate that will allow water, oxygen and nutrients to reach the roots of the tree. A tree collar will be installed to ensure aggregate is not against the trunk of the tree, as this can create conditions that allow for decay pathogens. ▪ **T180**: The proposed works will not result in a major encroachment within the TPZ and will have negligible impact on the tree. In all cases, where existing structures within the TPZ of these trees are proposed to be removed, the removal will be undertaken manually and sensitively under supervision of the project arborist to ensure that no significant roots will be impacted by the proposed works. All new structures will be installed in consultation and under supervision of the project arborist. Further detail, including tree plans and sections where relevant, is included in the Landscape RTS Response prepared by TCL (**Appendix E**) as well as in the updated Arboricultural Impact Assessment prepared by Tree Survey (**Appendix F**).	

Summary of Issue Raised	Response	Supporting Document
Several high-retention indigenous/native trees near building margins could likely be retained through revised setbacks, alternative footings and services re-routing.	Refer to the comments above explaining why the retention of trees located near the building margins (namely Trees 61, 71 and 85) is not viable. In summary, their retention would necessitate significant building redesign, resulting in a reduction in GFA of 38% and compromising the efficiency, safety and design intent of the proposal. Relocation of the proposed building to another location within the site is not feasible. Impacts associated with the removal of these trees will be offset by the retention of a much more significant area of BGHF to the north of the proposed development, planting of high-value indigenous replacement trees, as well as securing three ecosystem credits through the Biodiversity Offsets Scheme.	Appendix C
Assessment of Serious and Irreversible Impact (SAII) The SAII determination for BGHF should be reassessed after any amendment to the project design to maximise retention and avoid root zone disturbance.	No additional tree retention is proposed, as detailed above. The serious and irreversible impact assessment within the BDAR has been updated with additional information, including updated vegetation condition mapping, additional discussion around fragmentation, avoidance and resilience, and discussion around cumulative impacts – which are expected to be limited. The serious and irreversible impact assessment has been prepared in accordance with the BAM Section 9.1 requirements. Additional information has been provided within the Landscape RTS Response prepared by TCL to demonstrate that retention of certain trees (i.e. T123, T142, T169, T175, and T180) which will experience encroachment into their TPZ/SRZ is feasible. This position has been reached through collaboration with the project arborist to ensure the strategies proposed are feasible and robust. This will be managed through the construction methodology, including maintained or building up levels with the SRZs of these trees, use of tree collars where necessary, and supervision of the works by the project arborist.	Appendix C & Appendix E
Landscape plan and Vegetation Management Plan (VMP) adequacy The landscape plans and VMP do not clearly show numbers, locations and	The updated Tree Removal and Protection Plan provided in the Amended Landscape Design Report and the Landscape RTS Response prepared by TCL (**Appendix D & E**) now provides details of the numbers, locations, retention value and intent for removal/retention	Appendix D, E & H

Summary of Issue Raised	Response	Supporting Document
species of proposed trees or deep soil details. Further, weed species should not be nominated for retention.	for all existing trees clearly. All weed species, including Ligustrum sinesnis, within the project area have been removed. Details of soil depths have also been nominated on soil depth plans and in typical sections throughout the Amended Landscape Design Report. An updated Vegetation Management Plan has been prepared by Narla Environmental and is contained at **Appendix H**. The VMP has been updated to include a planting schedule which outlines a specific mix of trees, shrubs, and groundcovers for Management Zones 1 and 2, as well as quantities for each species.	
Relocated parking areas outside the SIP footprint The BDAR does not appear to cover the 'under the pines' or 'back court' areas proposed for temporary staff parking during construction. If relocation works in these areas involve site disturbance, there may be unassessed biodiversity impacts. See further discussion in relation to identification of 'the site' further in this letter.	The 'under the pines' construction parking area has been removed from the proposal. The BDAR has been updated to include the back court area which is proposed to accommodate temporary car parking and has confirmed that, as this is an area of existing hardstand within the campus, no site disturbance will occur. Accordingly there will not be any direct or indirect impacts to vegetation or biodiversity as a result of the use of this part of the broader campus site for temporary car parking.	Appendix G
The RtS must provide a detailed response to the matters raised by CPHR and Council, and incorporate the following recommendations: • revise the proposal in consultation with an AQF Level 5 Arborist to retain more high-significance and CEEC trees, using setback/footprint refinement, alternative	As outlined above and elsewhere in this table, retention of the high-significance trees identified by CPHR and Council is not feasible. In summary, their retention would necessitate significant building redesign, resulting in a reduction in GFA of 38% and compromising the efficiency, safety and design intent of the proposal. Relocation of the proposed building to another location within the broader campus is not feasible. Impacts associated with the removal of these trees will be offset by the retention of a much more significant area of BGHF to the north of the proposed development, planting of high-value	Appendix C

Summary of Issue Raised	Response	Supporting Document
footings and services re-routing outside TPZs. If tree retention is not feasible, clear justification is required	indigenous replacement trees, as well as securing three ecosystem credits through the Biodiversity Offsets Scheme.	
• update the Arboricultural Impact Assessment and Tree Protection Plan with: ○ TPZ/SRZ mapping and targeted root investigations ○ tree-sensitive construction and supervision methods ○ consistent tree numbers across all plans and documentation ○ removed weed species from any tree retention list	An updated Arboricultural Impact Assessment (AIA), including a Tree Protection Plan, has been prepared by Tree Survey and is attached at **Appendix F**. The AIA has been updated to include the following: ▪ TRZ/SRZ mapping and categorisation of levels of encroachment in accordance with the latest Australian Standard. The updated Australian Standard splits the previous "Major Encroachment" category into two "Moderate" (less than 20% encroachment in NRZ) and Major (more than 20% encroachment in NRZ). There are no trees proposed to be retained which will have major encroachment into their NRZ. ▪ Additional information in relation to tree-sensitive construction and supervision methods in relation to key trees identified for retention with moderate encroachment into their NRZ. ▪ Removal of weed species from tree retention list, resulting in a total of 127 trees proposed for removal and 68 proposed for retention. The landscape plans prepared by TCL have also been updated to ensure that tree numbers are consistent with those in the AIA.	Appendix D & F
• update the BDAR and associated architectural, landscape and stormwater plans to reflect increased tree retention	No additional tree retention is proposed, as detailed above. Retention of the identified significant trees is not possible for reasons noted previously in this RTS. Impacts associated with the removal of these trees will be offset by the retention of a much more significant area of BGHF to the north of the proposed development, planting of high-value indigenous replacement trees, as well as securing three ecosystem credits through the Biodiversity Offsets Scheme.	Appendix C
• demonstrate in the BDAR how impacts on BGHF have been avoided and minimised in	As detailed above, the BDAR has been amended to include additional details on the alternatives that were considered during the design process, including changes to the	Appendix G

Summary of Issue Raised	Response	Supporting Document
accordance with BAM, including consideration of reasonable and feasible alternatives	building footprint and alternative building locations. These changes are not feasible for the proposed development as they would have significant repercussions for the efficiency and utility of the proposed development and/or the existing campus. The proposal will minimise impacts on the BGHF by retaining a significant area of BGHF north of the proposed development, replacement planting of high-value indigenous trees, including those found within the BGHF plant community, as well as securing three ecosystem credits through the Biodiversity Offsets Scheme. Therefore, the proposal in its current state represents the minimum possible impact on the BGHF whilst retaining efficiency, functionality and safety of the proposed development.	
• expand fauna mitigation and submit the BDAR case in BOAMS with required digital files	The BDAR has been updated to include the identified mitigation measures including pre-demolition microbat surveys, pre-clearing surveys and reuse of trees with salvageable habitat features such as hollows. These measures have also been incorporated into the updated Vegetation Management Plan. Additionally, Narla Environment, the ecological consultant for the proposal, has now added CPHR as a Case Party in BOAMS, uploaded the required digital files, and submitted the case to 'Greater Sydney – Compliance & Regulation' for review, in response to the comments made by CPHR.	Appendix G
• update BAM-C calculations and reassess SAII to reflect any amended project design for additional tree retention	No additional tree retention is proposed, as detailed above, therefore an update to the BAM- C calculations has not been carried out. The serious and irreversible impact assessment within the BDAR has been updated with additional information, including updated vegetation condition mapping, additional discussion around fragmentation, avoidance and resilience, and discussion around cumulative impacts – which are expected to be limited. The serious and irreversible impact assessment has been prepared in accordance with the BAM Section 9.1 requirements.	Appendix C
• revise the landscape plan and VMP to show numbers, species and locations of all proposed trees, deep soil extents and soil	An Amended Landscape Design Report and a Landscape RTS Response have been prepared by TCL (**Appendix D & E**) which detail the location, quantity and species of all trees and other vegetation proposed to be planted as part of the development. Species	Appendix D & E

Summary of Issue Raised	Response	Supporting Document
volumes, and species characteristic of BGHF	which are native or are part of the BGHF vegetation community and clearly identified in the Thematic Planting Plans. Details of soil depths have also been nominated on soil depth plans and in typical sections throughout the Amended Landscape Design Report.	
• confirm whether 'under the pines' and 'back court' areas are within the BDAR study area, and if not, update the BDAR to assess any biodiversity impacts from construction/operational related use of these areas.	The BDAR has been updated to include the back court area which is proposed to accommodate temporary car parking and has confirmed that, as this is an area of existing hardstand within the campus, no site disturbance will occur and there will not be any direct or indirect impacts to vegetation or biodiversity as a result of the use for temporary car parking.	Appendix G
Built Form and Urban Design Council's submission raises concerns about the northern interface to Avon Road, citing excessive height and bulk, limited modulation of the facade, and reliance on vegetation for screening that includes trees proposed for removal. Further, concern is raised with proposed rooftop plant enclosures, shown on the northern edge without setback, which may increase visual prominence.	A response to these issues, as raised by Council, is provided in the 'Ku-ring-gai Council' portion of this table – see below.	Appendix C
The Department recognises that built form impacts along Avon Road are partly screened by existing trees between the proposed Secondary Innovation Precinct (SIP) building and Avon Road. If arboricultural advice supports increased setbacks or modulation to facilitate	As outlined above and elsewhere in this table, further arboricultural and design advice has not supported increased setbacks or modulation to retain high-value trees, due to the significant and excessive nature of change to the building footprint required to retain any additional trees. Aboricultural and ecological advice has not indicated that the retention of the trees in question is necessary. As outlined below, the retained BGHF located between the proposed development and Avon Road will provide sufficient visual buffer to effectively screen the proposed	Appendix C

Summary of Issue Raised	Response	Supporting Document
retention of additional high-value trees, this should be provided as it would both reduce bulk and scale impacts and improve biodiversity outcomes.	development when viewed from Avon Road, meaning that any built form impacts of the proposed development on the residential properties on Avon Road are limited.	
Insufficient information has been provided to demonstrate that the bulk and scale of the building is appropriate when viewed from Avon Road, with perspectives only provided internally within the site. The Department also notes the visual impact assessment includes view analysis from Avon Road and other locations, but it is unclear how the proposed removal of trees affects the provided view analysis.	In response to DPHI's and Council's concerns regarding the visibility and bulk and scale of the proposed development from Avon Road, a tree survey was conducted within the area of Blue Gum High Forest (BGHF) adjoining the development which was not accurately surveyed in the original survey submitted with the EIS. This updated tree survey has accurately identified the location, height and canopy spread of all trees and demonstrated that there is a substantial 40-70m wide band of dense, mature tree cover which will screen the development when viewed from Avon Road. The existing trees are the same height as the proposed development and the top of the proposed building cannot be seen over these trees due to eyesight angles. Whilst there is some tree removal proposed immediately adjacent to the proposed building footprint, their removal will have minimal impact on the visual buffer to Avon Road. The amended Vegetation Management Plan confirms that no tree removal is proposed within the 'Lower Riparian Zone', being the area of BGHF located between Avon Road and the proposed SIP Building. This extensive area of retained trees is located closer to Avon Road than the trees proposed to be removed and will provide effective screening. Additional renders have been prepared to demonstrate that, while the building may be partially visible through the branches in some locations, the overall density and height of vegetation along Avon Road effectively screens the majority of the proposed building's height, as shown in Figure 2. Drone footage was also taken within the Campus in the location of the proposed SIP building looking towards Avon Road. This drone footage further affirmed the density of the BGHF which provides a strong level of privacy and visual screening for the dwellings on Avon Road, with no portion of the dwellings being visible through the vegetation.	**Appendix C**

Summary of Issue Raised	Response	Supporting Document
	Therefore, there will be minimum visual or privacy impact to Avon Road as a result of the proposed development and subsequently the bulk and scale of the proposed building can be considered appropriate. A detailed response to matters relating to the visibility of the proposed development from Avon Road, including the additional renders and drone footage screenshots, is included in the Architectural RTS Response prepared by 3XN and attached at **Appendix C**. Figure 2 Render taken from Avon Road looking towards the SIP building demonstrating there will be minimal visibility of the proposed built form.  *Source: 3XN*	
The RtS must provide: • increased setbacks and/or modulation to the northern facade after confirmation from an AQF Level 5 arborist regarding	Refer to the comments above and elsewhere in this table explaining why the retention of additional high value trees along the northern façade is not viable. In summary, their retention would necessitate significant building redesign, resulting in a reduction in GFA of 38% and compromising the efficiency and design intent of the proposal. Relocation of the	Appendix C

Summary of Issue Raised	Response	Supporting Document
whether retention of additional high value trees is achievable. Revised architectural plans and sections demonstrating these changes are to be provided	proposed building to another location within the campus is also not feasible. Impacts associated with the removal of these trees will be offset by the retention of a much more significant area of BGHF to the north of the proposed development, planting of indigenous replacement trees, as well as securing three ecosystem credits through the Biodiversity Offsets Scheme.	
• an updated VIA that does not include/show trees proposed for removal from perspectives on Avon Road and other key receivers	As noted above, an updated tree survey has accurately identified the location, height and canopy spread of all trees within the area north of the SIP and Avon Road, with updated visualisations prepared factoring in the trees that are to be removed to facilitate the SIP building. Upon review of the supplied visualisations, it is the opinion of the Urbis VIA that the visual impact ratings of 'Nil' and 'Very Low' from Avon Road within the March 2025 VIA are unchanged, with the intervening mature vegetation providing screening of the building and being the main factor contributing to the impact rating from these locations. The Urbis technical review further notes that the section provided within the 3XN package demonstrates that the topographical differences between Avon Road and the SIP would not contribute to the visual exposure of the development site.	Appendix C & I
• a revised rooftop plant arrangement through relocation and/or setback from the building's northern edge, or reduced height/bulk, with enclosure materials and finishes selected to minimise visual prominence	The design of the rooftop plant arrangement has been reviewed and it is concluded that the existing proposed design will result in the least impact in terms of functionality, operational efficiency and visual bulk. The proposed rooftop plant has been intentionally located on the northern building edge to capture all relevant plant equipment and the lift overrun within one consolidated rooftop volume. Introducing a setback would disrupt this alignment, scattering plant equipment across the rooftop and causing the lift overrun and fire stair to protrude from the louvred enclosure, resulting in visual dissonance and giving the impression of a contrived or engineered form, rather than the simple box enclosure intended, as well as reducing the efficiency of PV panel placement and impacting the overall functionality of the proposal.	Appendix B & C

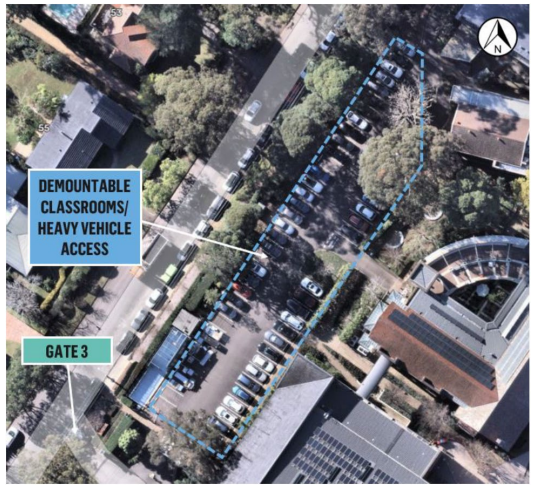
Summary of Issue Raised	Response	Supporting Document
	The rooftop plant enclosure is also substantially setback from the nearest residential dwellings by approximately 40-70m. This provides substantial physical separation that significantly reduces visual impact. This distance exceeds typical setback requirements and creates a generous buffer, particularly as this area is occupied by the existing Blue Gum High Forest. Therefore, it is considered that providing a setback of the rooftop plant would not result in a desirable outcome in terms of operational efficiency or visual impact, especially as it has been demonstrated through detailed tree modelling and rendering that the proposed building including the plant area will be minimally visible form Avon Road, as described elsewhere in this table. However, further consideration has been given to the colour and materiality of the rooftop plant in order to reduce its visual prominence. The proposed plant will be enclosed in aluminium louvre panels with a durable powder-coated finish in order to provide acoustic attenuation and act as a visual screen. These louvres are now proposed to be of a light silver colour, instead of the dark grey colour that was previously proposed, which will reflect the sky and visually recede behind the tree canopy, helping to reduce the apparent bulk of the plant enclosure. The enclosure effectively conceals rooftop plant equipment while maintaining a tidy, cohesive rooftop layout that supports PV panel installation and the school's sustainability objectives. Through this considered materiality, colour selection, and detailing, the enclosure is designed to integrate seamlessly into its surroundings and avoid appearing visually dominant from neighbouring properties.	
• a design statement explaining how arboricultural constraints have informed massing, articulation and materials at the residential interface.	A design statement explaining how arboricultural constraints, as well as other elements of the development site context, have informed the proposed development has been included in the Architectural RTS Response prepared by 3XN. In addition to the siting and location of the proposed SIP building being selected to minimise impacts on significant trees within the campus, the design of the building has responded to the character and scale of the mature BGHF adjoining the development site. The southern edge of the	Appendix C

Summary of Issue Raised	Response	Supporting Document
	building, which interacts with the existing campus buildings including the Colonnade building has been designed at a smaller, human-scale, with the building mass cascading upwards towards the northern edge, taking advantage of the height of the mature trees, which are level or, for a significant number of trees, rise beyond the SIP's maximum height. The building has been designed to provide larger format rooms and learning spaces with an outlook to the BGHF to the north, creating a connection to the existing landscape and natural environment. The materiality of the SIP has been designed to respond to the existing campus built heritage, drawing from the tones, materiality and proportions of the existing buildings. To support the application a Biophilia statement has also been prepared by TCL (**Appendix R**). This statement addresses how the proposed SIP and Campus Commons have been informed by biophilic design principles including integrating nature, supporting wellbeing and strengthening connection to place to enhance the learning environment. In particular, the project will create new and significantly improved views to landscape from surrounding buildings, including the SIP, Science Centre, Ferguson House and the Colonnade, all of which now overlook the extensive green spaces of the Campus Commons. These enhanced outlooks strengthen visual connection to nature and reinforce the relationship between the built environment and the landscape, supporting a cohesive and biophilic campus character. The internal spaces of the SIP also celebrate the site's connection to the Blue Gum High Forest, with layered views that frame the forest as a natural backdrop to many classrooms. These outlooks extend through the SIP to the forest beyond, strengthening daily awareness of Pymble's ecological setting and further embedding biophilic principles into the learning experience.	Appendix R
Parking Relocated staff parking During construction, 30 staff spaces are proposed to be relocated to "under the pines" and "back court." However, no plans	Temporary car parking arrangements for the proposed development have been revised since initial lodgement of the EIS, as outlined in the revised Traffic Impact Assessment and Preliminary Construction Traffic Management Plan prepared by Urbis and attached at **Appendix J and K** respectively. Refer to Section 4.4.1 of the CTMP for full details of parking proposed to be removed and added.	Appendix J & K

Summary of Issue Raised	Response	Supporting Document
or counts are provided to demonstrate that these areas can accommodate the relocated spaces. Existing and proposed conditions for these areas are required to inform the Department's assessment.	The 'under the pines' area is no longer proposed to be used for car parking. However, the 'back court' area is proposed to accommodate 46 temporary staff car parking spaces as shown in **Figure 3**. The back court area is currently being used as a construction staff car park for the ongoing works at the PLC Grey House Precinct. The existing access arrangements to the back court carpark will be retained when the SIP construction commences. Currently, access to this carpark is via Gate 3, turning right on the access roadway adjacent to the Centenary car park, and continuing around the materials recovery building and tennis courts. The back court temporary parking will compensate for the majority of car parking spaces lost either temporarily or permanently due to the proposed development, however additional parking will also be provided in various areas throughout the Campus, including adjacent to the oval, within the Centenary car park, and on street parking on an access road within the Junior School. The College has also made an agreement with the Gordon-Pymble Uniting Church for Pymble Ladies College to use 7 of the church's parking spaces for staff parking during construction works. Nevertheless, the proposed development will result in a temporary shortfall of 9 staff parking spaces, however this number is not considered to represent a significant loss of parking. The Preliminary Construction Traffic Management Plan prepared by Urbis has been updated to outline mitigation measures to address this temporary parking shortfall centred around encouraging public and active transport usage, including distribution of the College's Travel Access Guide and offering car-pooling incentives.	

Summary of Issue Raised	Response	Supporting Document
	Figure 3 Proposed Back Court parking arrangement  *Source: Urbis*	
<u>Construction worker parking</u> The EIS notes up to 115 workers are expected to work on site, but no on-site construction worker parking areas are proposed. While the preliminary construction traffic management plan states that recommendations from the SIP's School Travel Plan could be implemented during construction to mitigate the potential impact of construction activities on the parking supply in the surrounding area, travel behaviour of construction workers differs	The Preliminary Construction Traffic Management Plan (**Appendix K**) identifies that based on a construction workforce of 115 people and 40% of these driving, that demand for construction staff parking spaces is anticipated to be 46 spaces. It is also important to note that the number of staff will vary across different phases of construction, so the peak demand for 46 parking spaces is not expected to occur throughout the entire construction period. To address this demand, the revised CTMP identifies that construction staff parking will be accommodated through the conversion of 30 existing staff parking spaces in the Kelso car park into approximately 40 construction worker parking spaces. The increase in spaces from 30 to 40 is achieved through the use of tandem parking. A plan showing the proposed layout of the Kelso car park will be provided at the detailed CTMP stage following approval of the development.	Appendix J & K

Summary of Issue Raised	Response	Supporting Document
significantly from that of students and parents, and the Department does not consider this to be an appropriate mitigation. An assessment of on-street parking capacity and likely demand from construction workers is required.	An additional 10 construction worker spaces will be provided within the service road behind the SIP site, meaning there will be sufficient construction parking on site to meet the expected demand. Construction staff will also be strongly advised against using on-street parking and encouraged to use public transport or carpool. Equipment and tool storage areas will be provided on-site to reduce the need for staff to drive to work. Therefore, impacts on the on-street parking supply are not anticipated.	
The RtS must provide: • plans and details of relocated staff parking at "under the pines" and "back court," including existing and proposed conditions and confirmed space counts • plans and details of any on-site construction worker parking capacity • if overflow to on-street parking is expected, on-street capacity analysis • commitment to mitigation measures to minimise construction worker parking demand (also provided within an updated project mitigation measures table).	As outlined above and in **Appendix J** and **Appendix K.** • Temporary car parking is no longer proposed within the 'under the pines' area, however 46 staff car parking spaces are proposed within the 'back court' car park, as shown in **Figure 3** above. • There is anticipated to be demand for 46 construction worker parking spaces. Forty (40) construction parking spaces will be provided within the Kelso car park, , as well as an additional 10 in the service road behind the SIP site, meaning there will be sufficient construction parking to meet demand. Construction staff will also be encouraged to utilise active and public transport, as well as car pooling, to reduce private car usage and parking demand. • Construction workers will be strongly discouraged from using on-street parking. • Mitigation measures to manage the temporary shortfalls in staff and construction worker car parking are outlined in the TIA and CTMP, as well as in the updated mitigation measures table at **Appendix A**. DPHI has also requested that a survey be undertaken of on street parking availability in surrounding streets. This will be completed and provided to DPHI in early 2026.	Appendix A, J & K
Cumulative Impact Assessment The EIS states that approximately 14 temporary demountable structures will be required within the school site to	The EIS identified that it was likely that an exempt development pathway would be used for the proposed temporary demountables. Additional analysis has subsequently been undertaken to understand the space required to accommodate the number of students that will be temporarily displaced by the demolition of buildings for the SIP. This has shown	Appendix G, J & K

Summary of Issue Raised	Response	Supporting Document
accommodate displaced students during construction of the SIP, delivered under an exempt development pathway. However, no details have been provided regarding their proposed location/s, access and servicing arrangements, or their impacts on traffic, amenity, or biodiversity.	that two storey demountables are likely to be required, with their installation to be subject to a separate local DA to Ku-ring-gai Council. Notwithstanding, the project team has reviewed the area that will be occupied by the demountables. They will be located on the existing Conde staff carpark, located close to Avon Road on the northern part of the campus. The carpark is sealed bitumen with no vegetation either planted or remnant that will be affected by the proposal. A possible layout of the demountables is shown in the aerial image below. The Conde carpark is located close to the existing Conde Library and Senior School Centre. The location is readily accessible via existing pathways with no additional works required to support the demountables. Staff and students that occupy the demountables will remain well integrated with the Campus meaning that once installed there will be minimal operational impacts to the school. Figure 4 Proposed Demountable Location – Conde Carpark  *Source: Urbis*	
The Department's Cumulative Impact Assessment (CIA) Guidelines specify that cumulative impacts include 'reasonably foreseeable activities necessary for project delivery'. Reliance on the exempt development pathway does not remove the need to assess the siting and associated impacts of the temporary demountable structures in this application. The RtS must: • identify the location/s of temporary demountables on a revised site plan • assess their impact on traffic, access, parking, biodiversity/tree removal • update relevant reports to address the temporary works and structures.		

Summary of Issue Raised	Response	Supporting Document
	The use of Conde carpark for demountables will result in the temporary removal of 59 staff car parking spaces. To compensate for this, as outlined in the revised Construction Traffic Management Plan (**Appendix K**), 46 temporary staff parking spaces will be provided at the back court area, 24 temporary spaces on the southeast side of the oval and 4 temporary on-street spaces will be provided within the Junior School. A further seven (7) spaces will be available within the Uniting Church carpark. There will no shortfall of staff parking during construction. The Preliminary Construction Traffic Management Plan prepared by Urbis also outlines mitigation measures centred around encouraging public and active transport usage, including distribution of the College's Travel Access Guide and offering car-pooling incentives. The College will submit detailed plans and supporting reports to Council as part of the future DA for the demountables, and based on this preliminary impact assessment the works are not anticipated to result in unacceptable environmental impacts.	
<u>Building Code of Australia (BCA) Compliance</u> The BCA Compliance Report identifies a range of non-compliances and performance solutions required for the project. While the Department recognises that final compliance with the National Construction Code (NCC) would typically be confirmed prior to construction, key design issues with potential to affect the building layout or envelope should be resolved prior to determination. The RtS must: • provide further detail demonstrating how identified non-compliances and	An updated Fire Safety Engineering Review has been prepared by Jensen Hughes to provide further detail on indicative solutions to meet the relevant performance requirements. Jensen Hughes concludes that it is possible to develop performance solutions to meet the relevant performance requirements of the NCC without major changes to the proposed design of the development. This includes performance solutions relating to travel distances, which can be readily addressed without design changes through other methods, including a quantitative assessment demonstrating that the additional smoke detection system (10 m grid) provides sufficient early warning to occupants. Refer to the updated Fire Safety Engineering Review for further detail on the proposed performance solutions.	Appendix P

Summary of Issue Raised	Response	Supporting Document
performance solutions with regard to travel distances can be resolved during detailed design without requiring significant redesign • identify and address any other key items that could materially alter building form, layout, or external interfaces, with indicative solutions provided.		
Development Site The Department notes that the EIS and accompanying reports use terms such as 'development site', 'development area' and 'school site' inconsistently. Consistent terminology across all project documents is required to understand the scope of assessment provided. The RtS must: • clearly identify the land to which the development relates (the site), and provide consistent terminology across all documents • where documents have distinguished between the "development area" and broader site, this must be consistent across all technical documents • confirm that all relevant environmental and amenity impacts have been assessed	The SIP and Campus Commons project is located within the existing Pymble Ladies' College campus. Within the EIS, a clear outline of the 'development site', was identified, and this area formed the basis for the technical assessments including the contamination investigations and the Aboriginal Cultural Heritage Assessment Report (ACHAR). It is recognised however that both within the EIS and in the supporting technical assessments the term site and development site were not adopted consistently, which may have resulted in confusion as to the parameters of the project. Within this RTS, the development site refers to the boundary defined in red in the aerial image below, with 'the site' referring to the wider campus as outlined in blue. There are some ancillary elements of the proposal including supporting parking located outside of the development site, and where this is relevant to a technical assessment this has been made clear. The BDAR addresses all potential impacts within the development site as well as considering potential impacts outside of this area relating to construction parking. However, we note that the terminology used to describe the site and the context in the BDAR is prescribed by the *Biodiversity Conservation Regulation 2017* so this report refers to the *'subject land.'* This approach has been applied throughout the reporting updated as part of this RTS.	**N/A**

Summary of Issue Raised	Response	Supporting Document
for the extent of area where physical works are occurring (including under a separate planning pathway), and ensure that all technical documents (for instance, a revised BDAR) are updated to reflect this.	Figure *5* Development Area  *Source: Urbis*	

Summary of Issue Raised	Response	Supporting Document
Ku-ring-gai Council		
<u>Urban Design</u> <u>Excessive bulk and scale and visual impact</u> The proposed northern façade, which fronts Avon Road, comprises six storeys with an additional roof plant enclosure, resulting in a total building height of 29.68 metres (refer to Figure 1a). This represents a significant change in scale when compared to the adjacent R2-zoned low density residential dwellings along Avon Road. Furthermore, this façade lacks articulation or modulation to reduce its visual bulk. While this contrast in scale may be less of a concern if the building is not visible from Avon Road, this assumption requires careful consideration	The proposed development has been designed to respond to its context, particularly within the broader campus, whilst also avoiding potential visual impacts on surrounding residential dwellings. The building has been designed to integrate with the existing campus buildings, particularly the significant heritage buildings within the campus, by stepping down the bulk where it interfaces with the existing lower-scale campus buildings through the creation of terraces which are carefully setback to minimise visual impact. Moreover, as detailed below, further tree modelling and testing has been undertaken to confirm that the proposed development will be minimally visible from Avon Road due to the large area of significant, mature trees providing extensive screening. Despite this, the northern façade of the building, which faces Avon Road, includes detailed brickwork and panelling articulation to create visual interest and reduce its perceived visual bulk, if it were to be visible from the residences on Avon Road.	Appendix C
The submitted Visual Impact Assessment concludes that the overall visual effect on baseline conditions is 'low', noting that visibility of the proposal is limited, with mature and dense boundary vegetation screening all but small portions of the uppermost levels (refer to Figure 1).	In response to Council's concerns regarding the visibility of the proposed development from Avon Road, a tree survey was conducted within the area of Blue Gum High Forest (BGHF) adjoining the development which was not accurately surveyed in the original survey submitted with the EIS. This updated tree survey has accurately identified the location, height and canopy spread of all trees and demonstrated that there is a substantial 40-70m wide band of dense, mature tree cover which will screen the development when viewed from Avon Road. The existing trees are the same height as the	

Summary of Issue Raised	Response	Supporting Document
However, this conclusion appears to rely on the assumption that all existing vegetation between the proposed development and Avon Road will be retained. In practice, a number of trees in this area are proposed for removal, including several large specimens identified as having 'High Retention Value' (refer to Figure 2). It is also noted that the area where tree removal is proposed sits at a higher ground level, which then slopes downward toward the site boundary (refer to Figure 3 and 4)—potentially increasing the visual exposure of the development. Given the extent of proposed vegetation removal and the topographical context, there is concern that the building may be more visible from Avon Road and the surrounding low density residential dwellings than currently indicated. This increased visibility may result in adverse visual and privacy impacts on neighbouring properties. Accordingly, further analysis is recommended, along with consideration of additional mitigation measures to address these potential impacts.	proposed development and the top of the proposed building cannot be seen over these trees due to eyesight angles. Whilst there is some tree removal proposed immediately adjacent to the proposed building footprint, their removal will have minimal impact on the visual buffer to Avon Road. The amended Vegetation Management Plan confirms that no tree removal is proposed within the 'Lower Riparian Zone', being the area of BGHF located between Avon Road and the proposed SIP Building. This extensive area of retained trees is located closer to Avon Road than the trees proposed to be removed and will provide effective screening. Additional renders have been prepared to demonstrate that, while the building may be partially visible through the branches in some locations, the overall density and height of vegetation along Avon Road effectively screens the majority of the proposed building's height, as shown in Figure 2. Drone footage was also taken within the Campus in the location of the proposed SIP building looking towards Avon Road. This drone footage further affirmed the density of the BGHF which provides a strong level of privacy and visual screening for the dwellings on Avon Road, with no portion of the dwellings being visible through the vegetation. Therefore, there will be minimum visual or privacy impact to Avon Road as a result of the proposed development. A detailed response to Council's concerns regarding visibility of the proposed development from Avon Road, including the additional renders and drone footage screenshots, is included in the Architectural RTS Response prepared by 3XN and attached at **Appendix C**.	

Summary of Issue Raised	Response	Supporting Document
<u>Visual impact, setback and materials & finishes</u> Further to the point above, the proposed roof plant enclosure may be highly visible from neighbouring low-density residential dwellings, particularly given its location directly adjacent to the northern boundary with no setback to reduce its visual prominence. The absence of a setback contributes to the perceived bulk and scale of the structure when viewed from Avon Road and surrounding properties (refer to Figure 3 and 4). It is recommended that consideration be given to introducing a setback from the northern boundary to reduce the visual impact of the plant enclosure.	The rooftop plant enclosure is proposed to be positioned approximately 40 to 70 metres from the nearest residential dwellings along Avon Road. This provides substantial physical separation that significantly reduces visual impact. This distance is well in excess of typical setback requirements and creates a generous buffer, particularly as this area is occupied by the existing Blue Gum High Forest. The proposed rooftop plant has been intentionally located on the northern building edge to capture all relevant plant equipment and the lift overrun within one consolidated rooftop volume. Introducing a setback would disrupt this alignment, scattering plant equipment across the rooftop and causing the lift overrun and fire stair to protrude from the louvred enclosure, resulting in visual dissonance and giving the impression of a contrived or engineered form, rather than the simple box enclosure intended, as well as reducing the efficiency of PV panel placement and impacting the overall functionality of the proposal. Therefore, it is considered that providing a setback of the rooftop plant would not result in a desirable outcome in terms of operational efficiency or visual impact, especially as it has been demonstrated through detailed tree modelling and rendering that the proposed building including the plant area will be minimally visible form Avon Road, as described in previous responses in this table.	Appendix C
There is limited information provided regarding the design character and materiality of the enclosure. The Architectural Plans indicate the use of 'Solid Aluminium Louvre Panels – Colour: Dark Grey'. Depending on the final finish and detailing, this material could appear visually dominant within the surrounding residential context, particularly if viewed	Whilst a setback of the rooftop plant will not be provided, further design refinement of the rooftop plant has been pursued as per Council's comments. The proposed plant will be enclosed in aluminium louvre panels with a durable powder-coated finish in order to provide acoustic attenuation and act as a visual screen. These louvres are now proposed to be of a light silver colour, instead of the dark grey colour that was previously proposed, which will reflect the sky and visually recede behind the tree canopy, helping to reduce the apparent bulk of the plant enclosure. The enclosure effectively conceals rooftop plant equipment while maintaining a tidy, cohesive rooftop layout that supports PV panel installation and the school's sustainability	Appendix B & C

Summary of Issue Raised	Response	Supporting Document
against a backdrop of lighter vegetation or sky. Further design refinement is encouraged, including careful consideration of the enclosure's materiality, colour, and detailing, to ensure it does not present as a visually obtrusive element within the streetscape or from neighbouring properties.	objectives. Through this considered materiality, colour selection, and detailing, the enclosure is designed to integrate seamlessly into its surroundings and avoid appearing visually dominant from neighbouring properties.	
<u>Environmental considerations</u> The building design should include roof top and podium landscaped gardens to reduce the heat island effects of buildings that cannot be shaded by ground level tree canopy. This is an important long term environmental consideration given the expected rise in temperatures moving into the future, and reduction of stormwater runoff from expansive roof areas.	The rooftop area will be covered by a large amount of angled photovoltaic (PV) panels which will provide extensive shaded coverage and significantly reduce heat absorption. Approximately 37% of the roof is covered by PV panels, 30% by the plant room, and the remaining 40% comprises circulation, skylight, and façade access areas, which will be shaded by the panels. This strategy not only mitigates heat island effects but also generates renewable energy to support the College's sustainability commitments. Additionally, light-coloured, durable materials will be used on exposed elements such as the top of the fire stairs and lift overrun. Additionally, the proposal will feature two extensively planted, accessible terraces and a non-trafficable green roof, which together provide substantial shading, cooling, and biodiversity benefits.	Appendix C
Modulation of building facades and use of sustainable low maintenance materials such as brick and concrete, avoiding render which places burden on the body corporate to clean, maintain and paint. It is recommended to avoid the use of	The building façade is primarily composed of brick panels with powder coated aluminium trim and shrouds, which are low-maintenance, durable materials that avoid ongoing painting or cleaning requirements. Glass has been minimised, with a window-to-wall ratio of approximately 30%, providing daylight and passive solar benefits while reducing glare for neighbouring properties. The façade design is contextual to adjacent heritage brick buildings and incorporates subtle modulation to break up visual bulk.	Appendix C

Summary of Issue Raised	Response	Supporting Document
reflective materials and minimise glass as glare can impact neighbouring residents.		
Deep soil provision to ensure tall tree retention and growth, enable water infiltration to preserve water table levels and soil profiles that support Blue Gum High Forest (BGHF) and established vegetation, and reduce ground level heat build up	The proposed development includes the creation of a new landscaped campus commons area which maximises deep soil planting and provides for a variety of high density planting across garden beds, lawns and tree zones. All landscaped areas within the campus commons area (not including roof gardens on the SIP building) are in deep soil. Deep soil provision has been incorporated to support tall tree retention, water infiltration, and soil profile preservation, maintaining the Blue Gum High Forest and established vegetation as well as reduce ground-level heat build-up. TCL have reviewed each proposed tree species and the quantity of trees per garden bed in accordance with the NSW government requirement of a minimum of $9m^2$ of deep soil per tree to demonstrate that the proposed deep soil provision is sufficient for tall tree retention and growth. In response to this, tree species, locations & quantities have been reviews and amended. The Landscape RTS Response prepared by TCL contains further information demonstrating that sufficient soil volume is provided to support the proposed trees (at min 5m spacings).	Appendix D & E
<u>Safety</u> It is recommended that the building design include 'Crime Prevention Though Environmental Design' (CPTED) approaches - including measures to increase passive surveillance over the public domain, balconies/ windows orientated towards footpaths and increased activation of the public areas; and encourage onsite and street surveillance.	A CPTED analysis prepared by Urbis was included in the submission of the SSDA within the Architectural Design Report at pages 58-59 (Appendix G of the EIS). This analysis identified that the proposed development will align with the principles of CPTED including through use of glazing and location of the development in the heart of the campus to allow for passive surveillance, creation of high-quality, student-centred spaces to encourage a sense of ownership and territorial reinforcement, and installation of security measures such as alarms and CCTV to provide surveillance and access control. Refer to the Architectural Design Report submitted with the EIS for further detail.	Appendix G of the original EIS.

Summary of Issue Raised	Response	Supporting Document
Landscape SEARS – 7. Trees and Landscaping Submitted landscape plan (Appendix I) fails to provide the following information: • a full Planting Plan and Plant Schedule indicating location, and quantity has not been provided which is contrary to the SEAR's requirements. • clear indication of proposed trees. Landscape plans is missing information and is not suitable for full assessment of canopy trees proposed.	The location, quantity and species of all proposed planting and trees is outlined in the Amended Landscape Design Report prepared by TCL, specifically in the Thematic Planting Plans (**Appendix D**). Additionally, the updated Vegetation Management Plan prepared by Narla (**Appendix H**) also includes planting schedules for Management Zones 1 and 2 within the BGHF area north of the proposed development.	Appendix D & H
Arborist report (Appendix R) insufficient information has been provided to ensure retention of the following trees: • T123, T142, T169, T175, and T180; retention of these trees might not be possible due to major encroachments into Tree Protection Zone (TPZ) and some of them also due to encroachment into their Structural Root Zone (SRZ). Removal of existing surfacing/ structures and/ or installation of new surfacing/structures may impact the viability of the trees. No root mapping or other further assessment has been provided to verify these trees will be viable for retention.	It is not possible to eliminate works from the TPZs of trees T123, T142, T175, T169, T180. To manage this, levels within the SRZs of these trees will be maintained or built up. In areas where the base of the existing tree is below the proposed RL, a tree collar will be used to ensure the base of the tree is kept free of soil. The soil media specification and installation methodology will be confirmed with the arborist to ensure high aeration, low compaction and biological activity for tree health. Preferred soil types and details of the proposed tree collars are outlined in the Landscape RTS Response prepared by TCL (**Appendix E**). Specifications and details of paving within these areas will be finalised following development approval in the detailed design phase to minimise compaction. The proposed methods for retention and associated mitigation measures for the identified trees are outlined below. It is also important to note that all the identified trees are hardy species, often used for urban street tree plantings on council verges (between road, kerb, and pathways).	Appendix E & F

Summary of Issue Raised	Response	Supporting Document
	▪ **T123 & T142**: The proposed works will involve removing existing structure and reconfiguring the road. Additional impacts and encroachment within the TPZ will be negligible. ▪ **T169 & T175**: The proposed works will involve removing some existing structures and installing new hardscapes/landscapes within the TPZ. Soil levels within the TPZ will need to be raised, but this will be managed by using a free/draining aggregate that will allow water, oxygen and nutrients to reach the roots of the tree. A tree collar will be installed to ensure aggregate is not against the trunk of the tree, as this can create conditions that allow for decay pathogens. ▪ **T180**: The proposed works will not result in a major encroachment within the TPZ and will have negligible impact on the tree. In all cases, where existing structures within the TPZ of these trees are proposed to be removed, the removal will be undertaken manually and sensitively under supervision of the project arborist to ensure that no significant roots will be impacted by the proposed works. All new structures will be installed in consultation and under supervision of the project arborist. Further detail, including tree plans and sections where relevant, is included in the Landscape RTS Response prepared by TCL (**Appendix E**) and the updated Arboricultural Impact Assessment prepared by Tree Survey (**Appendix F**).	
The landscape proposal does not specify the number and proportion of native and indigenous species included.	The Amended Landscape plans (**Appendix E)** provide the quantity of each species proposed to be planted within the Thematic Planting Plans. These plans also identify both native species and species from the Blue Gum High Forest plant community.	Appendix E
A sub-soil irrigation system must be provided for all non-native planting areas and for planting located above structures.	Irrigation will be installed to all lawn areas, garden beds and podium planter beds and will be supplied by rainwater tanks within the Campus Commons. Irrigation will be used for planting establishment. Once established, moisture sensors will be used to deliver efficient watering.	Appendix E

Summary of Issue Raised	Response	Supporting Document
Plant species proposed for areas above structures are to be of low water use and suitable for planter bed conditions. Some proposed species, such as Aechmea gamosepala, do not meet these criteria.	Species selected for rooftop planting are a combination of exotic, native and indigenous plantings to ensure nominated patterns and amenity intentions are realised as well as providing a suite of plants that ensure a long term, durable outcome. Where shade requiring plant species have been specified (e.g. Ajuga reptans and Philodendron Xanadu), they are to be in shaded/sheltered positions within the roof gardens. Aechmea gamosepala has been removed from the planting schedule.	Appendix D & E
Tree removal & impacts and Part 13 Tree & Vegetation Preservation of KDCP The proposal includes the removal of several native and some indigenous significant, trees. The proposal shall seek to accommodate the proposed building and proposed structures to allow the retention of significant trees. The following trees are of high retention value, indigenous or native and located in the margins or adjacent to the proposed structures; these trees could be retained with a redesign of the proposal: T61, T71, T85, T102, T128, and T129.	A Tree Setback Plan (see **Figure 1**) has been prepared by Tree Survey which demonstrates that retention of trees T61, T71, T85, T102, T128 and T129 is not viable as their root and branch zones encroach significantly on the proposed building footprint. Retention of these trees would require significant redesign of the building form to accommodate their Tree Protection Zones / Nominal Root Zones and would necessitate the removal of approximately 38% of the proposed building GFA. Amending the building design to accommodate retention of these trees would require significant changes to the floorplate which would fail to meet the school's operational requirements and compromise circulation, fire safety, and key facilities such as the auditorium, bathrooms, and green roof, as demonstrated in the diagrams prepared by 3XN at Appendix C. The redesign of the project to retain these trees would be impractical and would not deliver the functional, safety, and environmental outcomes essential to the project. As previously stated within this RTS, alternative scenarios involving shifting the entire building footprint within the campus to enable the retention of the identified trees have also been explored. However, the options tested result in greater impacts overall, as the proposed location of the SIP has already been carefully selected to minimise biodiversity impacts and tree removal whilst reducing impacts to existing infrastructure and significant buildings. The impacts of all scenarios tested are outlined in the design response prepared by 3XN (refer to **Appendix C**)	Appendix C, D & P
Proposal includes the retention of T123, T142, T169, T175, and T180. Retention of these	It is not possible to eliminate works from the TPZs of trees T123, T142, T175, T169, T180. To manage this, levels within the SRZs of these trees will be maintained or built up. In areas	Appendix E & F

Summary of Issue Raised	Response	Supporting Document
trees might not be possible due to major encroachments into Tree Protection Zone (TPZ) and some of them also due to encroachment into their Structural Root Zone (SRZ). Removal of existing surfacing/structures and/or installation of new surfacing/structures may impact the viability of the trees. No root mapping or other further assessment has been provided to verify these trees will be viable for retention. AIA does not provide enough information to allow retention of these trees.	where the base of the existing tree is below the proposed RL, a tree collar will be used to ensure the base of the tree is kept free of soil. The soil media specification and installation methodology will be confirmed with the arborist to ensure high aeration, low compaction and biological activity for tree health. Preferred soil types and details of the proposed tree collars are outlined in the Landscape RTS Response prepared by TCL (**Appendix E**). Specifications and details of paving within these areas will be finalised following development approval in the detailed design phase to minimise compaction. The proposed methods for retention and associated mitigation measures for the identified trees are outlined below. It is also important to note that all the identified trees are hardy species, often used for urban street tree plantings on council verges (between road, kerb, and pathways). ▪ **T123 & T142**: The proposed works will involve removing existing structure and reconfiguring the road. Additional impacts and encroachment within the TPZ will be negligible. ▪ **T169 & T175**: The proposed works will involve removing some existing structures and installing new hardscapes/landscapes within the TPZ. Soil levels within the TPZ will need to be raised, but this will be managed by using a free/draining aggregate that will allow water, oxygen and nutrients to reach the roots of the tree. A tree collar will be installed to ensure aggregate is not against the trunk of the tree, as this can create conditions that allow for decay pathogens. ▪ **T180**: The proposed works will not result in a major encroachment within the TPZ and will have negligible impact on the tree. In all cases, where existing structures within the TPZ of these trees are proposed to be removed, the removal will be undertaken manually and sensitively under supervision of the project arborist to ensure that no significant roots will be impacted by the proposed works. All new structures will be installed in consultation and under supervision of the project arborist.	

Summary of Issue Raised	Response	Supporting Document
	Further detail, including tree plans and sections where relevant, is included in the Landscape RTS Response prepared by TCL (Appendix E) and the updated Arboricultural Impact Assessment prepared by Tree Survey (Appendix F).	
The AIA report includes the retention of Ligustrum sinesnis, which is a weed in NSW. These trees shall be removed and replaced with suitable tree species to the site. These tree species are not to be nominated as trees to be retained.	The Landscape Design Report prepared by TCL and Arboricultural Impact Assessment prepared by Tree Survey have been amended to specify that weed species, including Ligustrum sinesnis, within the project area are to be removed.	Appendix D & F
Landscape Proposal provides insufficient information The submitted landscape plan lacks essential detail and does not indicate the location of proposed trees. The landscape plan includes only a plant schedule with an indicative list of species, without defining the quantity and location of proposed trees on the site.	An amended Landscape Design Report has been prepared by TCL (**Appendix D**) which details the location, quantity and species of all trees and other vegetation proposed to be planted.	Appendix D
The proposed construction involves the removal of several native and some indigenous significant trees. The landscape proposal must demonstrate that tall trees can be accommodated within the available landscape areas within the scope of works.	TCL have reviewed each proposed tree species and the quantity of trees per garden bed in accordance with the NSW government requirement of a minimum of $9m^2$ of deep soil per tree to demonstrate that the proposed deep soil provision is sufficient for the growth of tall trees. In response to this, tree species, locations & quantities have been reviews and amended. The Landscape RTS Response prepared by TCL (**Appendix E**) contains further information demonstrating that sufficient soil volume is provided for each garden bed to support the proposed trees, including the significant indigenous trees.	Appendix E

Summary of Issue Raised	Response	Supporting Document
	Details of soil depths and extents have also been nominated on soil depth plans and in typical sections throughout the Amended Landscape Design Report to demonstrate that appropriate deep soil has been provided for the proposed planting.	
The concept design nominates an area called "The Blue Gum Garden" for indigenous planting. The plant schedule lists tall indigenous trees (e.g., Eucalyptus saligna, Eucalyptus pilularis, Angophora costata), but the allocated area is small and constrained by the proposed building and stormwater structures, not adequate to accommodate these trees.	As above, TCL has reviewed the proposed tree species, quantities, garden bed areas and deep soil extents and concluded that sufficient deep soil is provided to accommodate the proposed trees. Whilst servicing infrastructure is required to pass through the Blue Gum Garden area, the Landscape RTS Response (**Appendix E**) identifies that an additional 322m^2 of deep soil is proposed for the garden bed area compared to what is required under NSW Government guidelines. Therefore, the nominated trees within the Blue Gum Garden will have adequate soil to establish and thrive despite the location of servicing infrastructure. A section through the Blue Gum Garden area has also been included in the Landscape RTS Response to demonstrate that sufficient deep soil is provided.	Appendix E
An amended landscape plan is required to clearly show: • The number, location, and species of all proposed trees. • Trees to be retained (with reference numbers consistent with the Arboricultural Impact Assessment), trees to be removed, and new trees to be planted. • Finished and existing levels within the TPZ of trees to be retained.	The Tree Retention and Removal Plan prepared by TCL (**Appendix D**) has been amended to show numbers, locations, value and intent for removal/retention clearly. Tree numbering is now consistent with the updated Aboricultural Impact Assessment (**Appendix F**). Details of the finished and existing levels within the TPZ of trees which are proposed to be retained but are impacted by the proposed works (i.e. T123, T142, T169, T175, and T180) are also outlined in the Landscape RTS Response prepared by TCL (**Appendix E**).	Appendix D, E & F
The current plan uses unclear symbols and lacks tree numbering, making cross-referencing with the AIA difficult. Further	The Tree Retention and Removal Plan prepared by TCL (**Appendix D**) has been amended to improve clarity and include tree numbering which is consistent with the updated Aboricultural Impact Assessment (**Appendix F**).	Appendix D & F

Summary of Issue Raised	Response	Supporting Document
detailed information is necessary for a proper assessment of the landscape and tree retention outcomes.		
Ecology Streamlined Biodiversity Development Assessment Report (SBDAR) The SBDAR states that complete avoidance of impacts to the Blue Gum High Forest (BGHF) was not feasible due to the heavily vegetated condition of the site and limited space for new development. The development footprint has been located primarily within areas containing exotic vegetation or existing infrastructure, informed by an ecological constraints assessment undertaken by Narla in 2023. While the general intent to minimise biodiversity impacts through site selection is acknowledged, the report does not provide a detailed justification of alternative designs or layouts considered. Section 7.2 of the BAM requires proponents to demonstrate that genuine avoidance has been explored and documented, including consideration of changes to building footprints, access, or services.	Section 6 of the BDAR (**Appendix G**) has been amended to include further information of how alternative scenarios to avoid impacts on the BGHF have been explored, including alternative building footprints and locations. This is supported by additional detailed detail and drawings within the Architectural RTS Response prepared by 3XN (**Appendix C**). The location of the proposed building was selected as it is a previously built and managed area of the College campus and development in this location would minimise ecological disturbance and avoid the clearing of intact native vegetation. Narla notes that the proposed location represents the portion of the campus with the lowest ecological sensitivity and the greatest capacity to accommodate new built form while maintaining existing campus services and circulation networks. Importantly, all 171 trees in the Blue Gum High Forest north of the service road, as well as all habitat trees, will be retained as part of the proposed development. Four alternative building locations were tested to determine whether impacts on the BGHF could be minimised, particularly in relation to the retention of significant trees. However, the options tested resulted in greater ecological and infrastructure impacts compared to the proposed location of the SIP, as summarised previously within this RTS (refer to **Appendix C** and **Appendix Q**). Alternative scenarios involving a reduced building footprint have also been explored to retain Trees 61, 71 and 85, however it is considered that they cannot be viably retained without extensive building redesign which would not achieve the project goals or intended design outcome. A Tree Setback Plan (see **Figure 1**) has been prepared by Tree Survey which demonstrates the extent of the encroachment of the Tree Protection Zones / Nominal Root Zones of these trees on the proposed building footprint. Retention of these trees, as well as additional trees identified by Ku-ring-gai Council, would necessitate the removal of approximately 38% of the proposed building GFA. Amending the building	Appendix C, G & P

Summary of Issue Raised	Response	Supporting Document
	design to accommodate retention of these trees would require significant changes to the floorplate which would fail to meet the school's operational requirements and compromise circulation, fire safety, and key facilities such as the auditorium, bathrooms, and green roof, as demonstrated in the diagrams prepared by 3XN at **Appendix C**. The redesign of the project to retain these trees would be impractical and would not deliver the functional, safety, and environmental outcomes essential to the project. Accordingly, the proposed building represents the smallest feasible footprint whilst maintaining minimal overall site disturbance. Additionally, the BDAR outlines several mitigation measures which will be implemented to minimise impacts on the BGHF, including preparation of a Vegetation Management Plan and Construction Environmental Management Plan, tree protection measures, erosion and sediment controls, amongst others. Three ecosystem credits will also be secured through the Biodiversity Offsets Scheme.	
The SBDAR includes a determination under Section 9.1 of the BAM that the proposed impacts to BGHF are not serious and irreversible. This conclusion is based on the limited extent of clearing and retention of canopy trees. However, given the critically endangered status of BGHF and the inherent sensitivity of the community to ground disturbance and changes in hydrology, the basis for this determination should be further substantiated. A more detailed assessment of vegetation condition, structure, and resilience at the impact site would support a more robust conclusion.	The serious and irreversible impact assessment within the BDAR has been updated with additional information, including updated vegetation condition mapping, additional discussion around fragmentation, avoidance and resilience, and discussion around cumulative impacts – which are expected to be limited. The serious and irreversible impact assessment has been prepared in accordance with the BAM Section 9.1 requirements. This assessment identifies that, given the already urbanised setting of the campus, the proposed works will not increase landscape fragmentation or reduce ecological connectivity between existing patches of BGHF. The core BGHF corridor will remain structurally continuous before and after the proposed works, with only a 2.62% change in the area-to-perimeter ratio of BGHF within 1.5 km, which is ecologically insignificant. Refer to the updated BDAR prepared by Narla Environmental at **Appendix G** for further detail.	Appendix G

Summary of Issue Raised	Response	Supporting Document
The report outlines a range of standard mitigation measures, including the establishment of Tree Protection Zones (TPZs), erosion and sediment control, stormwater management, and protection of retained vegetation during construction. The preparation of a Vegetation Management Plan (VMP) is proposed to guide the management of retained BGHF on the Subject Property. This is supported and should be considered a critical component of post-approval requirements. The VMP should include detail on measures to manage edge effects, weed invasion, soil compaction, and long-term monitoring, and should be submitted to the consent authority for review prior to the commencement of works.	An updated Vegetation Management Plan has been prepared by Narla Environmental and is submitted as part of this RtS report (**Appendix H**) The VMP includes detailed management action, including in relation to edge effects, weed management and removal and soil compaction. The VMP also outlines a protocol for long-term (5-year) monitoring of the vegetation management strategies following completion of the development.	Appendix H
The proposed impact generates a requirement for three (3) ecosystem credits for PCT 3136, to be secured in accordance with the Biodiversity Offsets Scheme. This appears proportionate to the scale of clearing proposed.	Noted.	N/A

Summary of Issue Raised	Response	Supporting Document
In summary, while the SBDAR addresses key biodiversity values and proposes a range of mitigation and management measures, the following issues require further clarification: • The report does not adequately demonstrate that impacts to BGHF have been avoided where possible, as required under the BC Act and BAM. Further information should be provided on design alternatives considered and the rationale for the selected development footprint.	Refer detailed discussion above - the BDAR has been amended to include additional details on the alternatives that were considered during the design process, including changes to the building footprint and alternative building locations.	Appendix G
• The determination that the impact is not serious and irreversible would benefit from more detailed site-specific evidence on vegetation condition and the cumulative impacts to retained BGHF.	Section 8.4 of the BDAR has been updated with additional information, including updated vegetation condition mapping, additional discussion around fragmentation, avoidance and resilience, and discussion around cumulative impacts – which are expected to be limited. The serious and irreversible impact assessment has been prepared in accordance with the BAM Section 9.1 requirements. This assessment identifies that, given the already urbanised setting of the campus, the proposed works will not increase landscape fragmentation or reduce ecological connectivity between existing patches of BGHF. The core BGHF corridor will remain structurally continuous before and after the proposed works, with only a 2.62% change in the area-to-perimeter ratio of BGHF within 1.5 km, which is ecologically insignificant. Refer to the updated BDAR prepared by Narla Environmental at **Appendix G** for further detail.	Appendix G
Request for Revised Vegetation Management Plan	An updated Vegetation Management Plan has been prepared by Narla Environmental and is contained at **Appendix H**. The VMP has been updated to include a planting schedule	Appendix H

Summary of Issue Raised	Response	Supporting Document
A revised Vegetation Management Plan (VMP) is requested to address the current deficiencies and ensure compliance with relevant guidelines. While the proposal is currently supported by a VMP, the plan should be amended and updated to incorporate the following: • The VMP must clearly identify and commit to the planting of a specific number and mix of trees, shrubs, and groundcovers. A general reference to a list of potential species is insufficient. The revised VMP should include the number of each plant type to be installed, their specific locations or planting zones, and the rationale for species selection in the context of the site conditions and ecological objectives.	which outlines a specific mix of trees, shrubs, and groundcovers for Management Zones 1 and 2, as well as quantities for each species. The rationale for the species selection, as outlined in the VMP, is centred around ensuring that planted species algin with the benchmark composition and structure of the Blue Gum High Forest plant community type (PCT) to guarantee the ecological authenticity of the revegetated area and eliminate the risk of introducing atypical or potentially non-local species. Planting densities for canopy species and mid-storey shrubs ensure reinstatement of a dominant overstorey and stratified understorey. The ground layer comprises benchmark taxa from the grass, climber, forb, and fern growth forms. These species are identified as frequent or very frequent within the BGHF PCT and provide dense cover for soil stabilisation and competitive suppression of weeds. The use of frequent and very frequent species guarantees alignment with the benchmarks for the PCT, and the species selected are generally available from regional bushland nurseries or are otherwise available within the broader subject site for propagation.	
• The VMP should clearly identify primary and secondary weeds and outline methods for the staged removal of large privets and camphor laurels to ensure effective weed management and minimise ecological disturbance.	The updated VMP outlines primary and secondary weeds, as well as the proposed methodology for their removal, within Table 3. Refer to the VMP for further detail.	Appendix H
• The revised VMP must be prepared in accordance with the Guidelines for Vegetation Management Plans published by the NSW Office of Water. This includes,	The introduction of the updated VMP clearly identifies that it has been prepared in accordance with the NSW Department of Planning and Environment (DPE) Controlled Activities – Guidelines for Vegetation Management Plans on Waterfront Land (2022). The VMP includes objectives, performance criteria and an implementation schedule with	Appendix H

Summary of Issue Raised	Response	Supporting Document
but is not limited to, clear objectives and performance outcomes, monitoring and maintenance schedules, responsibility for implementation and ongoing management, and detailed planting and establishment methodology.	responsible actors identified, as well as detailed management measures, planting schedules and monitoring specifications.	
Engineering *Water Management (Part 24 of KDCP)* Part 24A. Site Design for Water Management It is proposed that stormwater is to be discharged to the existing stormwater network into the kerb inlet pits along the service road located within private property. A 10m long level spreader is proposed to be connected to a surcharge pit to capture any overland flow, next to the oval, for disposal into the landscape areas.	Noted – no further action required.	N/A
Part 24C. 5 Controls for On-site Detention The proposed development includes two OSD tanks situated within the external area located west of the proposed SIP Building. OSD 1 is proposed to discharge into the sump outlet chamber within OSD 2.	The requested information is available on the stormwater plans lodged with the EIS, and reissued in the Updated Water Management Plan prepared by BG&E to accompany this RtS report (refer **Appendix L**). Refer specifically to Drawing S23158-CI-0350 (OSD 1 with RWT) for the location of the OSD and it's volume, and refer to Drawing S23158 CI-0355-(OSD section 2) for cross section details of the tank depicting surface and invert levels.	Appendix L

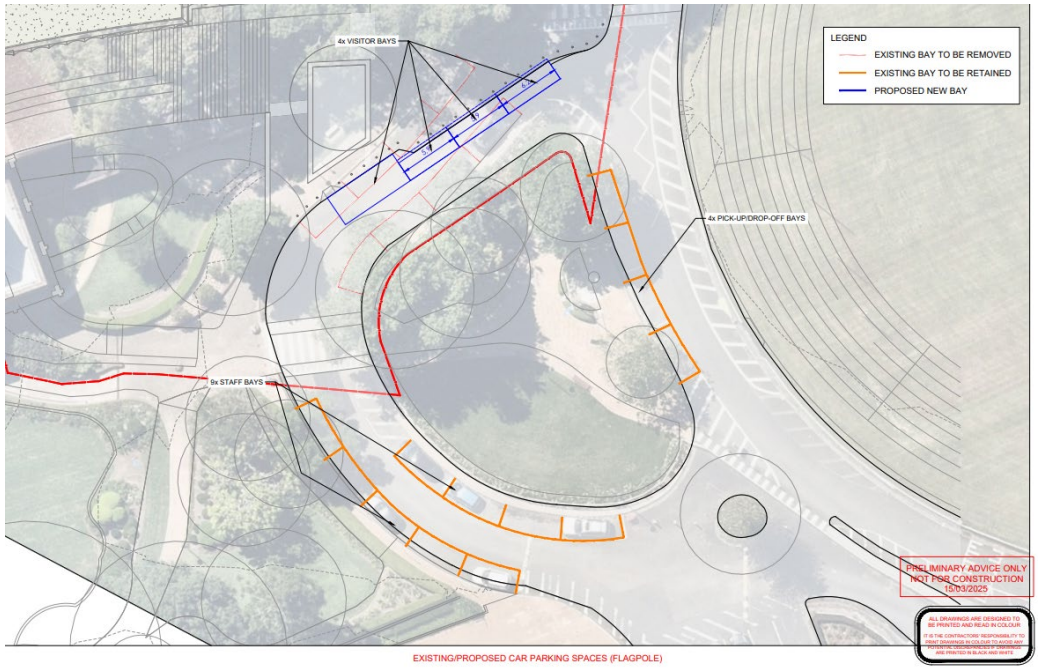
Summary of Issue Raised	Response	Supporting Document
The storage volumes of OSD 1 and OSD 2 are 235m3 and 45m3 respectively. The location of the access pits to the detention system and rainwater tank are shown to be readily accessible external to the building which is acceptable. Stormwater plans should clearly show location of the OSR and its volume as well as cross section details of the tank depicting surface and invert levels.		
Part 24C.4 On-site Stormwater Management No BASIX certificate has been submitted as part of the SSD development. A 25kL rainwater tank is proposed as part of OSD 1 tank. The purpose of water re-use is to be clarified. No supporting hydraulic calculation submitted to demonstrate compliance with Part 24C.3-4 of the Ku-ring-gai DCP that requires rainwater retention and re-use to be provided to achieve a 50% reduction in runoff days. A water balance model has not been submitted.	A BASIX certificate is not required as the proposed development relates to an educational use, not a residential use. The updated Water Management Report prepared by B&GE (refer **Appendix L**) includes additional detail on the proposed rainwater tank, including clarifying that the collected rainwater is to be used for irrigation purposes only. The requested calculations have also been provided in Appendix E of the updated report.	Appendix L

Summary of Issue Raised	Response	Supporting Document
Part 24B.5 Pump-out tank A pump-out tank within the basement is to be provided and designed for the 100-year 2 hour storm.	A pump-out tank in the basement is not required for the proposed development as the floor level of the basement allows it to be drained out by gravity to the existing downstream drainage pit.	Appendix L
Part 24C.6 Stormwater Quality Control The captured stormwater will be treated using 5 Oceanguard pit insert, 7 x 690mm PSORB Stormfilter Cartridges and 3 x 690mm PSORB Stormfilter Cartridges within OSD1 and OSD2 respectively located within the OSD tank and trash screens within the OSD tanks. The pollutant load standards have been satisfied. MUSIC model results have been provided.	Noted – no further action required.	N/A
Part 24D.2 and Part 24E.1 Flood Studies and Design Procedures The development is located outside the 1% AEP flood extent and is subject only to local rainfall runoff, which can be effectively managed by the proposed civil design and drainage measures. The residual flood risk is low, and no evacuation or further flood risk mitigation beyond the designed drainage system is required.	Noted – no further action required.	N/A
Recommendations (Water Management)	The updated Water Management Report prepared by B&GE includes additional detail on the proposed rainwater tank, including clarifying that the collected rainwater is to be used	Appendix L

Summary of Issue Raised	Response	Supporting Document
• No supporting hydraulic calculation submitted to demonstrate compliance with Part 24C.3-4 of the Ku-ring-gai DCP that requires rainwater retention and re-use to be provided to achieve a 50% reduction in runoff days. A water balance model has not been submitted. • No clarification has been provided as to the purpose of the proposed rainwater tank given that a retention component would also be required. • Council's OSD Calculation Sheet is to be submitted to confirm the OSD site storage requirements have been met. • No stormwater disposal system has been submitted for the basement level. • No supporting calculation for the pump-out pit based on the 100 year 2 hour storm has been submitted. • Stormwater design does not show the rising main from the pump-out tank directed to the on-site detention tank.	for irrigation purposes only. The requested calculations have also been provided in Appendix E of the updated report. The report has also been updated to include Council's OSD calculation sheet at Appendix D of the report. The stormwater disposal system for the basement consists of draining by gravity to the existing downstream drainage pit, which is feasible due to the floor levels of the basement. As such, a pump-out pit is not required for the development.	
Waste Management (Part 25 of KDCP) Part 25A.1 General Requirements A proposed garbage and recycling storage area is located in the basement adjacent to the loading bay area. The	Noted – no further action required.	N/A

Summary of Issue Raised	Response	Supporting Document
waste / recycling storage area is accessible from the basement level. Waste from the SIP building will be transported to the centralised waste facility which will be serviced by private contractor		
Part 25A.3 Access to Collection Point Loading/Servicing Provisions In order to meet Council's servicing requirements, all waste material will be stored in 3 x 1100-litre red lidded mobile waste bins. All recycling material will be stored in 1 x 1100-litre yellow lidded mobile bins and all paper and cardboard recycling material will be stored in 2 x 660-litre blue lidded mobile bins. While the SIP Building has sufficient provisions to manage its own operational waste and recycling, the College's centralised waste facility will form part of the overall plan for waste management	Noted – no further action required.	N/A
Geotechnical Investigation A conditioned should be imposed that the basement excavations are to be fully tanked unless it can be demonstrated to the discretion of the certifier that ongoing dewatering will be less than 3ML/year AND	The preference of the project team is for the proposed basement to be drained. Hydrogeological testing is currently underway to determine the presence of groundwater and establish whether a drained basement is feasible on the development site.	Appendix L

Summary of Issue Raised	Response	Supporting Document
the proposal is approved by NSW DPI Office of Water.		
Prior to excavation commencing, dilapidation reports should be completed on adjoining structures and infrastructure.	Noted – dilapidation report will be prepared prior to excavation and demolition.	N/A
Traffic Parking Provision and Traffic Generation There will be a permanent loss of 4 on-site car parking spaces due to modifications to the area adjacent to the flagpole lawn. This is from the total supply of 431 parking spaces located throughout the college, and the TIA/ EIS justifies this loss on the basis that it is less than 1% of total parking supply and will have negligible impact. Irrespective, clarification should be provided as to the current allocation of the 4 car parking spaces that will be removed, and mitigation measures.	In response to Council's comment, reconfiguration of campus parking has occurred to unlock additional parking. An area within the Centenary car park which is currently being used for storage space is proposed to be converted into car parking, creating five additional car parking spaces within the campus. Therefore, there is now a net increase in parking spaces by one. Further to this increase of one space, the rectification of a previous supply miscount has unlocked five parking spaces at the Junior School (upper) parking area. Therefore, there will be no loss of car parking and mitigation measures are not required.	Appendix J
Section 4.2.1. (Car Parking) of the TIA states that a detailed map showing the parking allocation at the flag pole area is shown in Appendix A, but this plan does not clearly show existing and proposed parking so as to be able to understand where the changes are taking place, and from which car parking user group.	The map of the flagpole area in Appendix A of the revised Transport Impact Assessment has been updated to show existing parking spaces to be removed, existing parking spaces to be retained (and their purpose) and the four proposed new visitor parking bays. An extract from this plan is provided in Figure 6.	Appendix J

Summary of Issue Raised	Response	Supporting Document
	Figure 6 Existing and Proposed Car Parking Spaces (Flagpole Area)  *Source: Urbis*	
Also, the College should clarify whether the remaining on-site parking will be available, and would be adequate to cater for, the above special events (i.e. robotics competitions) without relying on surrounding streets.	The Traffic Impact Assessment has been updated to address parking arrangements for special events. Special events are anticipated to typically occur outside of school hours, meaning there will be low demand from typical users (i.e. staff) for parking spaces when events are occurring. Subsequently, the TIA concludes that there should be sufficient parking supply within the campus to accommodate the high volume of cars from visitors. Should a special event coincide with regular class hours, the college will provide internal parking for visitors. This information will be communicated to staff, parents, and students	Appendix J

Summary of Issue Raised	Response	Supporting Document
	ahead of the events. Visitors will be directed to appropriate parking locations within the college grounds.	
Construction Parking Impacts – due to the proposed construction laydown area, 10 car parking spaces will be temporarily lost. Clarification should be provided as to the current allocation of the 10 car parking spaces that will be temporarily lost, and mitigation measures.	Through the reconfiguration of the proposed temporary car parking areas, the construction works will result in a reduction in the loss of car parking spaces from 10 to 9. This number is not considered to represent a significant loss of parking. The Preliminary Construction Traffic Management Plan prepared by Urbis has been updated to outline mitigation measures to address this temporary parking shortfall centred around encouraging public and active transport usage, including distribution of the College's Travel Access Guide and offering car-pooling incentives.	Appendix K
<u>Construction Traffic Management</u> It is understood that the College is considering the use of truck-and-dog for demolition and delivery of construction materials. However, this design vehicle is subject to change depending on the suitability of surrounding local roads and intersections to accommodate the swept paths. This will be assessed during the preparation of a detailed CTMP for the site.	Noted – this matter will be resolved post-approval.	N/A
It should be conditioned that a detailed CTMP be submitted prior to the issue of the construction certificate showing the construction vehicle routes for the southbound and northbound directions, largest vehicle to be used entering and exiting the site for the demolition, excavation and construction stages,	Noted – the preparation of a detailed CTMP can be included as a condition of consent.	N/A

Summary of Issue Raised	Response	Supporting Document
stockpiles and all necessary tree protection fencing.		
<u>Noise and Land Contamination Impacts</u> <u>Noise</u> The architectural plans identify two distinct external rooftop plant rooms are proposed on the Secondary Innovation Precinct (SIP) building, with the following approximate dimensions: • Area 1 – 10 metres x 7 metres • Area 2 – 24 metres x 10 metres Both areas are to be enclosed by solid aluminium louvre panels, approximately 5 metres in height and finished in dark grey. However, the Acoustic Assessment Report: • refers only to a 300 mm acoustic louvre, which appears to be a supplementary attenuation measure rather than the 5-metre architectural louvre enclosure; • does not provide any commentary on the acoustic performance rating (e.g. Rw value) of the proposed architectural louvres; • does not assess or reference the configuration or shielding effect of the louvre enclosures; and	An updated Acoustic Assessment Report has been prepared by PWNA (**Appendix N**) which has been amended to remove the reference to the 300mm acoustic louvre as a mitigation measure and confirm that acoustic modelling has not been undertaken at this stage as details of the proposed plant equipment is unknown. Detailed assessment and recommendation of mitigation measures will be conducted at the Construction Certificate stage. However, the updated Acoustic Assessment Report has determined that the proposed consolidated rooftop plant is likely to feature a lower sound power level compared to the existing scenario on the subject site, which consists of a significant amount of unenclosed rooftop plant across three different buildings generating noise. The proposed rooftop plant is expected to result in lower noise levels due to advancements in technology resulting in lower operational noise of plant and equipment, the consolidated nature of the plant into one area, as well as the location of the equipment within a mechanical plantroom, which can be equipped with additional acoustic measures if considered necessary at the Construction Certificate stage.	Appendix N

Summary of Issue Raised	Response	Supporting Document
• does not estimate the number, type, or cumulative sound power levels of mechanical plant items expected within these zones.		
Prior to determination, it is recommended that the following matters be clarified by the applicant: 1. Whether the 5-metre high rooftop louvre enclosures have been factored into the acoustic modelling as effective noise control barriers, and if so, whether any Rw rating or performance specification has been applied;	The Acoustic Assessment Report has been updated to clarify that, since mechanical plant equipment will not be finalised until the Construction Certificate stage, acoustic modelling has not yet been undertaken. Nevertheless, it is expected that there will be no issues with the rooftop plant complying with the relevant noise level criteria, subject to detailed assessment and mitigation measures to be determined at CC stage. The 5-metre louvres are not explicitly intended to be an acoustic measure, although it is noted that enclosing the plant equipment will have the effect of lessening the noise level for sensitive receivers.	Appendix N
2. Whether the 300 mm acoustic louvre mentioned in the report is intended as a separate mitigation measure, and how it integrates with the architectural louvre design; and	The Acoustic Assessment Report has been updated to remove the reference to the 300mm acoustic louvre as a mitigation measure since it has determined that the proposed consolidated rooftop plant is likely to feature a lower sound power level compared to the existing scenario which consists of a significant amount of rooftop plant across three different buildings. This is due to advancements in technology resulting in lower operational noise of plant and equipment, the consolidated nature of the plant into one area, as well as the location of the equipment within a mechanical plantroom, which can be equipped with additional acoustic measures if considered necessary at the Construction Certificate stage.	Appendix N
3. Whether indicative details of proposed mechanical plant (e.g. number, type, and sound power levels) can be provided to support validation of predicted compliance with relevant operational	At the development application stage, details of the proposed mechanical plant, including the associated noise levels, are currently unknown. Details of the required mechanical services equipment and acoustic treatments (if required) to ensure the relevant noise level criteria is achieved will be provided as part of the Construction Certificate submission of the project. The updated Acoustic Assessment Report does note that the proposed plant	Appendix N

Summary of Issue Raised	Response	Supporting Document
noise criteria, particularly the night-time trigger level of 35 dB(A) LAeq(15min).	is expected to have lower sound power levels compared to the existing scenario, due to consolidation of plant, technological advancements, and containment of plant within a mechanical plantroom.	
<u>Land Contamination</u> The PSI identifies four Potential Areas of Environmental Concern (PAECs) within the development footprint. These are associated with: • PAEC 1 – Historical agricultural land use and potential uncontrolled fill; • PAEC 2 – Historical pesticide application across various parts of the site; • PAEC 3 – Potential offsite contamination migration (vapour or leachate) from nearby former service stations or dry cleaning operations within 300 m; • PAEC 4 – Potential asbestos-containing materials (ACM) and lead-based paints within buildings proposed for demolition. Given the above, and the proposal involving demolition and excavation of soils, ECON Environmental concludes that the site cannot currently be confirmed as suitable for the proposed use and that there may be a risk to human health and the environment if contamination is present and unmanaged.	A Detailed Site Investigation (DSI) has already been prepared for the subject site and was submitted alongside the EIS as Appendix KK. The DSI concluded that the development site does not contain any chemical contaminants of concern, or areas of environmental concern. However, the DSI included recommendations for further investigation into areas within the buildings nominated for demolition, which were not accessible at the time of preparing the report. If these future investigations, which are to be undertaken post-demolition, identify potential contamination on the development site, a Remedial Action Plan will be prepared.	Appendix KK of the original EIS

Summary of Issue Raised	Response	Supporting Document
Accordingly, it is recommended that: • A Detailed Site Investigation (DSI) be undertaken to assess the extent of contamination, with sampling to target all identified PAECs; and • If contamination is confirmed, a Remedial Action Plan (RAP) be prepared to outline appropriate management or remediation measures in accordance with NSW EPA guidelines. These documents should be submitted to the assessing authority prior to determination, to ensure the site can be made suitable for its intended educational use, in line with the requirements of the State Environmental Planning Policy (Resilience and Hazards) 2021 and the NEPM (2013) Assessment of Site Contamination.		
Lighting The proposed building is six storeys high on the northern elevation and with the removal of weeds required by the Vegetation Management Plan, the lighting from the building may potentially impact the residential dwellings along Avon Road.	All external lighting will be designed and installed in full compliance with AS/NZS 4282:2019, ensuring fixtures are mounted, screened, and directed away from neighbouring dwellings. This will prevent nuisance or light spill onto adjoining properties or the public domain. The northern façade facing Avon Road is primarily occupied by learning spaces, staff areas, circulation cores, and bathrooms, which are generally used during standard school hours. After-hours use is limited to a small number of spaces such as staff areas, Robotics and D+T workshops, and occasional events in the auditorium or lobby. These spaces are located at ground or lower-ground levels, with light spill further reduced by the dense Blue	Appendix C

Summary of Issue Raised	Response	Supporting Document
To address any future nuisance associated with lighting and to protect the amenity if surrounding properties, it is recommended that all external lighting must comply with AS/NZS 4282:2019: Control of the obtrusive effects of outdoor lighting and be mounted, screened and directed in a way that it does not create a nuisance or light spill on to buildings on adjoining lots or public places. Consideration should also be given to the potential impact of internal lighting, particularly where large windows or transparent façades face sensitive residential areas. Design treatments such as internal blinds, low-transmittance glazing, or architectural shading elements should be considered to minimise light spill and protect residential amenity	Gum High Forest and shrub layers between the building and Avon Road. In addition, the northern façade has only ~30% glazing, further minimising potential light transmission. Given the limited after-hours use, the location of active spaces, and the screening provided by existing vegetation, the potential for internal or external lighting to impact residential amenity is considered minimal.	
Transport for NSW (TfNSW)		
TfNSW has reviewed the submission and notes that the new development is proposed to replace existing educational buildings with no net increase in student and staff population. The proposed building will not generate additional demand for car parking, and no car	Noted – no action required.	N/A

Summary of Issue Raised	Response	Supporting Document
parking spaces will be provided within the development. All vehicular access to the school is via the local road network with the site is located some distance from the nearest classified road (Pacific Highway). As such, TfNSW has reviewed the EIS and has no requirements as the development is unlikely to have a significant impact on the classified road network.		
Heritage NSW		
The response from Ku-ring-gai Council in Stage 1 of consultation identified the Aboriginal Heritage Office as an organisation which should be contacted. Please confirm whether the Aboriginal Heritage was contacted. If not, the organisation should be contacted with an invitation to register for consultation on the project.	An invitation to register for the project and a copy of the ACHAR with cover letter and ACHAR methodology was sent to the Aboriginal Heritage Office on 20 August 2025 with response requested by close of business 17 September 2025. No response was received. A record of the correspondence has been included in the Consultation Records of the updated ACHAR prepared by Artefact Heritage and Environmental (**Appendix O**).	Appendix O
It is noted that the study area for the proposed works has been altered since the ACHAR was finalised. Please provide an update to all Registered Aboriginal Parties (RAPs) which include the *Pymble Ladies' College Secondary Innovation Precinct (SIP) and Campus Commons Aboriginal Cultural Heritage Assessment Report*	Artefact Heritage and Environmental prepared an updated ACHAR and accompanying cover letter detailing the updated project boundaries which was sent to the 7 Registered Aboriginal Parties by email on 21 August 2025 requesting feedback by close of business 18 September 2025. Responses were received from three RAPs, with the responses detailed in the updated ACHAR consultation records. All three RAPs endorsed/agree with the ACHAR and its recommendations.	Appendix O

Summary of Issue Raised	Response	Supporting Document
Memo, date 11 March 2025, to ensure that RAPs are kept up to date on the status of the project.	It is noted that the Metropolitan Local Aboriginal Land Council did not register for the project and therefore were not provided with the updated ACHAR.	
Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation		
Biodiversity		
CPHR did not have access to the BDAR case in Biodiversity Offsets and Agreement Management System (BOAMS) for its review and no digital files were provided. **Recommended action:** The ecological consultant: ▪ adds 'Greater Sydney – Compliance & Regulation' as a Case Party in BOAMS, ▪ uploads the required digital files (refer to Appendix L of the BAM 2020 for guidance), and ▪ submits the case to 'Greater Sydney – Compliance & Regulation' as the consent authority.	Narla Environment, the ecological consultant for the proposal, has now added CPHR as a Case Party in BOAMS, uploaded the required digital files, and submitted the case to 'Greater Sydney – Compliance & Regulation' for review.	N/A
Insufficient effort was made to genuinely avoid impacts to mature trees that form part of the Blue Gum High Forest CEEC, which is also a SAII entity under the	Retention of the identified trees (T61, T71 and T85) which are located near the edge of the proposed building has been explored further in response to CPHR's comments, however it is considered that these trees cannot be viably retained without extensive building redesign which would not achieve the project goals or intended design outcome.	Appendix C, D, G & P

Summary of Issue Raised	Response	Supporting Document
Biodiversity Conservation Act 2016 (BC Act). There are 3 highly significant trees proposed for removal - Trees 61, 71 and 85 as per the provided arborist report. These trees are located near the edge of the proposed building and present a development constraint. There is a requirement to avoid impacts to CEEC/SAII vegetation and significant trees in the landscape in line with: ▪ sections 6.2 and 6.12 of the BC Act ▪ section 7 of the BAM ▪ Point 7 of the SEARs ▪ clause 6.3 of the Ku-ring-gai LEP 2015 ▪ Objective 27 of the Greater Sydney Region Plan – A Metropolis of Three Cities ▪ Planning Priority N16 of the North District Plan ▪ Planning Priority K28 and K31 of the Ku-ring-gai Local Strategic Planning Statement ▪ Part 13 and 18 of the Ku-ring-gai DCP 2014	A Tree Setback Plan has been prepared by Tree Survey which demonstrates the extent of the encroachment of the Tree Protection Zones / Nominal Root Zones of these trees on the proposed building footprint. Retention of these trees, as well as additional trees identified by Ku-ring-gai Council, would necessitate the removal of approximately 38% of the proposed building GFA. Amending the building design to accommodate retention of these trees would require significant changes to the floorplate which would fail to meet the school's operational requirements and compromise circulation, fire safety, and key facilities such as the auditorium, bathrooms, and green roof, as demonstrated in the diagrams prepared by 3XN at Appendix C. The redesign of the project to retain these trees would be impractical and would not deliver the functional, safety, and environmental outcomes essential to the project. Additionally, alternative scenarios involving shifting the entire building footprint within the campus to enable the retention of the identified trees have also been explored. However, the options tested result in greater impacts overall, as the proposed location of the SIP has already been carefully selected to minimise biodiversity impacts and tree removal whilst reducing impacts to existing infrastructure and significant buildings. The impacts of all scenarios tested are outlined in the design response prepared by 3XN (refer to **Appendix C**) and summarised below: ▪ Shifting building to northeast or southeast – Encroachment of building on the main oval which is an essential facility for the College. – Impact on Gate 1 ring road which is an essential access point for drop-off and pick-up for the College and would result in traffic impacts on local roads. – Would require increased excavation due to topography of site. – Would require the removal of additional significant mature trees (e.g. T4, T10, T23 and others), resulting in similar or worse biodiversity impacts. ▪ Shifting building to south	

Summary of Issue Raised	Response	Supporting Document
▪ Section 193 of Environmental Planning and Assessment Regulation 2021 ▪ Greener Places (Government Architect NSW, 2020). **Recommended actions:** ▪ Plans are amended in consultation with a suitably experienced AQF level 5 arborist to enable the viable retention of Trees 61, 71 and 85. ▪ The BDAR is updated accordingly.	– Impact on Gate 1 ring road which is an essential access point for drop-off and pick-up for the College and would result in traffic impacts on local roads. – Encroachment on Colonnade Building and Flagpole Lawn which hold cultural and historical significance to the College. – Would require increased excavation due to topography of site. – Retention of trees T61 and T71 would still not be possible. ▪ Relocating to the footprint of existing buildings to be demolished – Encroachment on Colonnade Building and Science Building, impacting access. – Necessitates increase in building height due to site levels, or greater excavation needed. – Loss of vehicular access for loading dock and inadequate space for fire truck access. – Retention of trees T71 and T85 would still not be possible. Additionally, any relocation of the building further to the east or southeast will require permanent relocation to existing utility services and an existing access road. Therefore, there is no viable option to relocate the proposed development within the campus in order to retain the identified significant trees. Subsequently, it is impossible to avoid impacts on the identified trees, however all 171 trees in the Blue Gum High Forest north of the service road, as well as all habitat trees, will be retained as part of the proposed development. The design also includes the planting of 61 new high-value trees, with only six high-value trees removed at the boundary of the SIP. Three ecosystem credits will also be secured through the Biodiversity Offsets Scheme. This considered approach — supported by arborist and environmental consultancy advice — ensures the project delivers the best possible outcome for the school, neighbours, and the local environment. Therefore, while impacts are unavoidable, they will be appropriately managed and offset as much as possible through the proposed development.	

Summary of Issue Raised	Response	Supporting Document
The BDAR specifies that some structures proposed to be demolished have the potential to be used as a roost resource by threatened microbat species. In addition, a large area of vegetation is proposed to be removed. **Recommended action:** The BDAR mitigation section is updated to include measures to: ▪ Mitigate impacts on microbats potentially roosting in structures to be demolished, for example pre-demolition surveys. ▪ Mitigate impacts of vegetation clearing to fauna, for example pre-clearing surveys and supervised removal 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. ▪ Re-use a subset of trees that are proposed to be removed, including tree hollows, tree trunks greater than 30 cm in diameter and 2-3 m long and root balls, to enhance habitat within the management areas	The BDAR has been updated to include the identified mitigation measures including pre-demolition microbat surveys, pre-clearing surveys and reuse of trees with salvageable habitat features such as hollows. These measures have also been incorporated into the updated Vegetation Management Plan.	Appendix G

Summary of Issue Raised	Response	Supporting Document
described in the accompanied vegetation management plan.		
The executive summary in the BDAR states: "The proposed development is expected to impact on areas of exotic vegetation as well as select groundcovers representative of one (1) Plant Community Type (PCT): 3136: Blue Gum High Forest". This is an inaccurate description of the impact to PCT 3136 as the impact to this PCT includes the removal of trees. **Recommended action:** ▪ The executive summary is updated to accurately describe the extent of impact to PCT 3136.	The BDAR has been updated to include an accurate description of the impacts to PCT 3136 in the executive summary.	Appendix G
In line with avoid and minimise comments above for the BDAR, Trees 61, 71 and 85 should be retained. **Recommended action:** ▪ Plans are amended in consultation with a suitably experienced AQF level 5 arborist to enable the viable retention of Trees 61, 71 and 85. ▪ The AIA, Tree Protection Specifications, and associated drawings/plans are updated to demonstrate how these	Refer to the comments above explaining why the retention of Trees 61, 71 and 85 is not viable. In summary, their retention would necessitate significant building redesign, resulting in a reduction in GFA of 38% and compromising the efficiency, safety and design intent of the proposal. Relocation of the proposed building to another location within the campus is also not feasible. Impacts associated with the removal of these trees will be offset by the retention of a much more significant area of BGHF to the north of the proposed development, planting of indigenous replacement trees, as well as securing three ecosystem credits through the Biodiversity Offsets Scheme.	Appendix C

Summary of Issue Raised	Response	Supporting Document
trees can be viable retained in line with the Australian Standard 4970—2025 Protection of Trees on Development Sites.		
The provided AIA states "Further design development will need to be undertaken with the Landscape Architect to ensure grade changes and proposed works will not impact trees…". The AIA must demonstrate how trees can be viably retained in line with AS 4970-2025. **Recommended actions**: ▪ Plans are updated in consultation with the project arborist to enable the viable retention of trees. ▪ The AIA and Tree Protection Plan be updated to demonstrate how trees can be viably retained in line with section 3 of the AS 4970:2025.	An updated Arboricultural Impact Assessment has been prepared by Tree Survey (Appendix F) which includes further discussion and information to demonstrate how certain key trees can be viably retained despite moderate encroachment within their NRZ. The proposed methods for retention and associated mitigation measures for these key trees are outlined below. It is also important to note that all of the identified trees are hardy species, often used for urban street tree plantings on council verges (between road, kerb, and pathways). ▪ **T123 & T142**: The proposed works will involve removing existing structure and reconfiguring the road. Additional impacts and encroachment within the TPZ will be negligible. ▪ **T169 & T175**: The proposed works will involve removing some existing structures and installing new hardscapes/landscapes within the TPZ. Soil levels within the TPZ will need to be raised, but this will be managed by using a free/draining aggregate that will allow water, oxygen and nutrients to reach the roots of the tree. A tree collar will be installed to ensure aggregate is not against the trunk of the tree, as this can create conditions that provide pathways for decay pathogens. ▪ **T180**: The proposed works will not result in a major encroachment within the TPZ and will have negligible impact on the tree. In all cases, where existing structures within the TPZ of these trees are proposed to be removed, the removal will be undertaken manually and sensitively under supervision of the project arborist to ensure that no significant roots will be impacted by the proposed works. All new structures will be installed in consultation and under supervision of the project arborist.	Appendix E & F

Summary of Issue Raised	Response	Supporting Document
	The AIA has also been updated to specify that the minor encroachment into the NRZs of some trees proposed to be retained is considered unlikely to impact the overall health or condition of these trees and that, under the current proposal, these trees can be successfully retained. Therefore, no changes to the plans are required to accommodate viable tree retention.	
Flood Risk Management		
The site is not identified as flood prone land. The development footprint is in the upstream area of Avondale Creek catchment and adjacent to a minor tributary. The runoff from the small area upstream of the site is less than 20 m3 /s as identified in the WMP. Therefore, the habitable floor should be identified in accordance with clause 3 of the Ku- ring-gai DCP Section 24D.3. Table 3 of the flood assessment should reflect this clause. No further flood risk management input is required.	The Flood Report prepared by Arup (**Appendix M**) has been updated to address clause 3 of the Ku- ring-gai DCP Section 24D.3. The report states that floor levels will be confirmed in accordance with the relevant criteria in clause 3 prior to the issue of a Construction Certificate however, as the finished floor level of the basement of the proposed building is approximately 4m above the bed level of the adjacent minor tributary, it is likely that it will be well above the required minimum floor level.	Appendix M
Sydney Water		
▪ Our preliminary assessment indicates that water and wastewater servicing should be available for the proposed development.	Noted – no immediate action required.	N/A

Summary of Issue Raised	Response	Supporting Document
▪ Amplifications, adjustments, deviations and/or minor extensions may be required. ▪ Detailed requirements will be provided at the Section 73 application stage.		
Should the Department of Planning, Housing and Infrastructure (the Department) decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent. ▪ Section 73 Compliance Certificate ▪ Building Plan Approval	Noted – no immediate action required.	N/A
Rural Fire Service		
The NSW RFS has no specific concerns with the proposal relating to bush fire protection. Further referrals to the NSW RFS are not required for subsequent stages of the development assessment process.	Noted – no action required.	N/A

Summary of Issue Raised	Response	Supporting Document
Fire & Rescue NSW		
FRNSW have reviewed the EIS with particular focus to the Preliminary Hazards Analysis (Appendix LL) and the Fire Engineering Statement (Appendix Z). FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.	Noted – no action required.	N/A
Individual Submitters		
Anonymous Objector No. 1		
The building is completely out of character and scale for the site and surrounding area.	The proposal has been carefully designed to reflect and respect the character of the campus setting. The SIP building expresses design quality through the modulation of building forms, materials and finishes representing that blend with the immediate context including the heritage buildings located within the College campus. The design is sympathetic to the surrounding natural environment and is positioned to celebrate and enhance the natural and designed landscaping of the campus. The façade materiality also reflects the character of the College, echoing the brick heritage buildings and arches in the curved panels. The SIP respects the heritage of neighbouring buildings by maintaining a low scale where the buildings are closest, then terracing upward to the north. By positioning the proposed development in a previously developed portion of the campus, the school can deliver upgraded facilities without compromising recreational space or significantly impacting areas of biodiversity.	Appendix C

Summary of Issue Raised	Response	Supporting Document
	Moreover, the proposed development is separated from the nearest residential properties on Avon Road by a significant area of tall, mature trees which effectively screen the bulk and scale of the development when viewed from Avon Road and minimising visual impact of the development.	
Of particular concern is the removal of a number of highly significant trees within the remnant Blue Gum High Forest BGHF. I note in the assessment there are Blue Gums and Spotted Gums with some of a diameter in excess of 1m being removed.	While the proposal does require the removal of a number of trees, including some within the remnant Blue Gum High Forest, significant measures are proposed to offset and mitigate these impacts. Specifically, the proposed scheme will deliver 61 replacement trees to increase the quality and biodiversity of the canopy cover and support the existing site ecology. In addition, seed propagation of the Blue Gum High Forest will be conducted to mitigate impacts from the proposed tree removal. A Vegetation Management Plan by Narla Environment will be employed to ensure the continued protection of the BGHF on the campus. Three ecosystem credits will also be secured through the Biodiversity Offsets Scheme. These measures collectively demonstrate a commitment to maintaining and enhancing the ecological values of the development site and the broader campus.	Appendix D, E, F, G & H
Anonymous Objector No. 2		
<u>Irreversible Loss of Mature Trees and Biodiversity</u> The proposed development necessitates extensive tree removal, including mature trees. This is particularly alarming given Pymble's reputation for its green beauty and the critical ecological role these trees play. No rooftop planting can genuinely replace the ecological value, canopy cover, and environmental benefits of established trees. Ku-ring-gai Council's Development Control Plan (DCP) Part 13	Given the heavily vegetated nature of the campus and the limited availability of suitable cleared areas for construction, complete avoidance tree removal was not feasible. Alternative building locations and footprints were tested during the design phase but it was determined that it would not be possible to avoid all impacts to significant trees whilst delivering a building that meets the needs of the College and has a safe, functional and efficient layout. Despite this, trees are protected and retained where possible, with the ecological impacts of the proposal minimised in line with the Biodiversity Development Assessment Report and Vegetation Management Plan. Importantly, all 171 trees in the Blue Gum High Forest north of the service road, as well as all habitat trees, will be retained as part of the proposed development. The design also includes the planting of 61 new high-value trees, with only six high-value trees removed at the boundary of the SIP. Three ecosystem credits	Appendix C, D, G, H & P

Summary of Issue Raised	Response	Supporting Document
explicitly protects trees and vegetation, prohibiting injury or removal without consent, and mandates replacement plantings, especially in biodiversity areas. Furthermore, the removal of "blue gum trees" is of grave concern, as "Blue Gum High Forest" is a critically endangered ecological community in Ku-ring-gai. A school, as an institution dedicated to future generations, should be a steward of environmental preservation, not a force for its destruction.	will also be secured through the Biodiversity Offsets Scheme. This considered approach — supported by arborist and environmental consultancy advice — ensures the project delivers the best possible outcome for the school, neighbours, and the local environment.	
<u>Inappropriate Scale and Visual Bulk in a Residential Setting</u> The introduction of a 6-story building fundamentally alters the low-density residential character of our neighbourhood. This sets a dangerous precedent, risking the transformation of Pymble into an area akin to Macquarie Park, where high-rise developments have impacted air quality, natural vegetation, and local peace. Our neighbourhood is cherished for its green, open spaces and tranquil environment. A building of this height and bulk will lead to significant visual intrusion and high rise normalization which directly	The proposal is a for a five storey (plus basement) building. The size and scale of the proposed building has been designed to respond to the practical requirements for the school and respect the character of the campus and its surroundings. The SIP building expresses design quality through the modulation of building forms, materials and finishes representing that blend with the immediate character of the area including the heritage buildings located within the College campus. By siting of the SIP in a previously developed portion of the campus, the school can deliver upgraded facilities without compromising recreational space or significantly impacting areas of biodiversity. Moreover, the proposed development is separated from the nearest residential properties on Avon Road by a significant area of tall, mature trees which effectively screen the bulk and scale of the development when viewed from Avon Road and minimising visual impact of the development. Based on this, it is evident that the proposed building is not a high-rise development, and being an educational facility, comparison to dense, urbanised built form seen in Macquarie Park is not a valid consideration. Instead, this proposal strengthens the	Appendix C

Summary of Issue Raised	Response	Supporting Document
conflicting with the amenity residents here expect and deserve.	campus's environmental and architectural character, ensuring it remains a place of learning set within a green and peaceful landscape.	
<u>Detrimental Impacts from Demolition, Excavation and Construction Traffic</u> The extensive demolition and excavation required for this project will inevitably generate substantial noise and dust pollution, severely impacting local air quality and the health of residents, particularly children and those with respiratory conditions. Our community has already experienced significant disruption from previous construction, with heavy trucks operating from early hours (e.g. 4-5 am on Everton Street), causing noise, traffic congestion, and a loss of peace. Pymble is chosen by many for its healthy environment, and these prolonged disturbances are unacceptable. While a Construction Traffic Management Plan is anticipated, past experiences suggest that such plans may not adequately mitigate the profound impact on daily life.	As part of the proposal, excavation to a maximum depth of approximately 5m will be required to achieve the proposed Lower Ground Floor and Partial Basement level. While this is a necessary step in achieving the proposal, a range of measures will be implemented to minimise disruption and maintain the community's amenity throughout the process. Specifically, a Construction Environmental Management Plan (CEMP) will be produced following determination to manage soil, surface water, weeds, and pollutants, along with site-specific procedures. In addition, the Noise and Vibration Impact Assessment (NVIA) states that while works near sensitive receivers may occasionally exceed the affected noise management level, all predicted results remain well below the highly noise-affected threshold. To further mitigate impacts, construction methodologies such as erection of acoustic screens, alternate plant and equipment, and amendments to the construction schedule will be used to reduce any impacts on noise. Through this comprehensive suite of procedures, the proposal will be delivered without causing disruption or a loss of peace in the community, allowing the area to retain its valued sense of tranquillity throughout the construction period.	Appendix N
<u>Sustainable Alternatives Over Expansion</u> If the school requires additional space to accommodate more students, a responsible and less impactful approach	The proposed SIP is a considered and responsible investment in the future of senior students by establishing a new gathering space and supporting both their educational and social needs. It has been designed to deliver state-of-the-art classrooms that foster STEM learning in ways that adaptive reuse of existing facilities could not achieve.	Appendix C

Summary of Issue Raised	Response	Supporting Document
would be to explore alternative strategies. The NSW Department of Education itself considers multi-campus models and the adaptive reuse of existing buildings as viable solutions to manage student growth and reduce pressure on single sites. A wealthy institution has the capacity to invest in such sustainable and community-sensitive solutions, rather than imposing further strain on an already established residential area. Prioritising expansion on a single site at the expense of local environmental and residential amenity is a selfish approach that disregards the well-being of the surrounding community.	Alternative locations outside of the campus are not practical or appropriate as the campus is established and has operated in the current location since the early 1900s. Providing the SIP facility in another location would fragment the school community and create logistical challenges for students. The proposal will be located predominantly within the footprint of the existing Isabel McKinney Harrison, Dorothy Knox, John Vicars and Robert Vicars Buildings, instead of being on otherwise, undeveloped land. The proposed development would support the existing student and staff population on the campus, noting that no increase to student capacity is proposed. The supporting technical assessments have also demonstrated that a resultant impacts on the surrounding community will be minor.	

5 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole.

The proposed development has been assessed with regard to the matters for consideration under section 4.13 of the EP&A Act and the SEARS issued by DPHI. We conclude that the proposed development can be supported for the following reasons:

- The proposed development remains consistent with all relevant State and local government strategic planning policies.
- The proposal has been prepared having regard to State and Council planning policies and complies with the aims and objectives of the controls applying to the development site.
- The proposed development will not result in adverse environmental or amenity impacts that cannot be appropriately managed through the mitigation measures outlined in **Appendix A**. The proposal has minimised biodiversity and visual impacts as much as feasible whilst maintaining the functionality of the proposed development.
- Design refinements have been introduced to respond to comments from DPHI, Council, government agencies and public submissions, including relating to the provision of temporary car parking and materiality refinement. These design refinements and clarifications are minor in nature and no significant changes to the design or built form of the development as previously exhibited are proposed.
- Additional mitigation measures have been proposed in the BDAR and VMP (**Appendix G and Appendix H**) to respond to agency comments, including targeted microbat surveys pre demolition, pre-clearing habitat inspections and ecologist supervision during vegetation removal. Hollows, logs, bark slabs and other structural habitat features will be salvaged and reused to enhance habitat availability post construction. These additional mitigation measures have been incorporated into the updated table of proposed mitigation measures at **Appendix A**.
- The project has considered the wider locality including the surrounding campus, surrounding infrastructure, and the cumulative impacts of other projects in accordance with DPHI's Cumulative Impact Assessment Guidelines for State Significant Projects. The assessment of the proposal has addressed all supporting works, including temporary parking arrangements required to deliver the project.
- Additional information has been provided by 3XN (**Appendix C**), in collaboration with the arborist and surveyor, which demonstrates that the proposed development will be appropriately screened by the extensive area of Blue Gum High Forest north of the building, meaning that is will not be significantly visible from the residential dwellings on Avon Road. The proposed tree removal that forms part of the project will have no impact on the effectiveness of this visual buffer.
- The proposed building has been located on a previously developed portion of the campus to minimise impacts to areas of ecological sensitivity and required tree removal. The SIP building is proposed to replace several existing, aging buildings which (without significant physical intervention and upgrade) are close to the end of their useful design life. The proposed building footprint is commensurate with the existing buildings to be demolished, with a negligible increase of 300m^2 over a total footprint of 2,660m^2.
- Alternate locations for the proposed SIP have been explored and it has been determined that relocating or shifting the proposed building in any direction will result in additional adverse impacts, including loss of additional mature trees, removing heritage listed buildings, affecting the existing roads and ovals, requiring greater excavation and reducing the size and scale of the Campus Commons Green Space.

- Opportunities for further tree retention have been explored, however they would require a significant amendment to the building design and floorplate which would result in a reduction in total GFA of 38% and would fail to meet the school's operational requirements and compromise circulation, and fire safety. It would also have significantly spatial impacts on key facilities such as the auditorium, bathrooms, and green roof.
- The proposed Campus Commons has been designed to retain existing ground levels and maximise deep soil planting to ensure growth of tall trees. The landscaping proposal has adopted the NSW Planning Guidelines of $9m^2$ (3m X 3m) of deep soil per tree.
- The development site is entirely suitable for the proposed development as it continues the use of the campus as an educational establishment, which is a permissible use on the site.
- The proposal will support the ongoing operations of the College, through the provision of new and upgraded facilities to enable the fostering of high quality educational and learning experiences.

Having considered all relevant matters, there will be no additional environmental impacts as a result of the proposed refinements and clarifications. The refinements include additional measures to ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant. On this basis, the proposed development is appropriate for the development site and surrounding campus and approval is recommended, subject to appropriate conditions of consent.

Disclaimer

This report is dated 18 December 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Pymble Ladies College **(Instructing Party)** for the purpose of Response to Submissions **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A Updated Mitigation Measures

Appendix B Architectural Plans

Appendix C Architectural RTS Response

Appendix D Landscape Design Report

Appendix E Landscape RTS Response

Appendix F Aboricultural Impact Assessment

Appendix G Biodiversity Development Assessment Report

Appendix H Vegetation Management Plan

Appendix I Visual Impact Assessment Addendum

Appendix J Transport Impact Assessment

Appendix K Preliminary Construction Traffic Management Plan

Appendix L Water Management Plan

Appendix M Flooding Assessment

Appendix N Acoustic Assessment

Appendix O Aboriginal Cultural Heritage Assessment Report

Appendix P Fire Engineering Review

Appendix Q Structural Engineering Review

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Appendix R Biophilia Paper