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Contact: Bonnie Yue

Ref: SSD-79146716

29 July 2025

Department of Planning Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Via: NSW Major Projects portal

Attention: Dimitri Gotsis

Dear Sir,

RE: SUBMISSION TO SSD-79146716 - FOR PYMBLE LADIES' COLLEGE SECONDARY INNOVATION PRECINCT AT 20 AVON ROAD, PYMBLE

Thank you for the opportunity to comment on the State Significant Development (SSD) application (SSD-79146716) for the demolition of existing structures, tree removal, road adjustments, the construction of a five-storey building development and associated landscaping at Pymble Ladies' College at 20 Avon Road, Pymble.

This submission should be considered as an **objection** to the proposal. The submission (**Attachment 1**) gives a detailed explanation of the reasons for Council's objection.

It is requested that the Applicant's Response to Submissions (RtS) is forwarded to Council for review prior to a determination being made. Council will be able to provide recommended conditions of consent following review of the RtS, unless there are substantial unresolved issues.

Subject to satisfactory resolution of all of the issues raised in this submission, Council may withdraw its objection to the proposal.

Should you have any further enquiries, please contact Bonnie Yue, Senior Assessment Officer, on 9424 0000 (Monday – Wednesday)

Yours sincerely,

Stuart Wilson
A/Team Leader Development Assessment

ATTACHMENT 1

Ku-ring-gai Council's objection to SSD-79146716 - 20 Avon Road, Pymble (Pymble Ladies' College Secondary Innovation Precinct)

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1. Urban Design

A. Excessive bulk and scale and visual impact

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 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**).

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.

Figure 1: *Viewpoint 04 photomontage from Avon Road (source: Urbis, Visual Impact Assessment)*

Figure 1a: *Northern elevation of the proposed building*

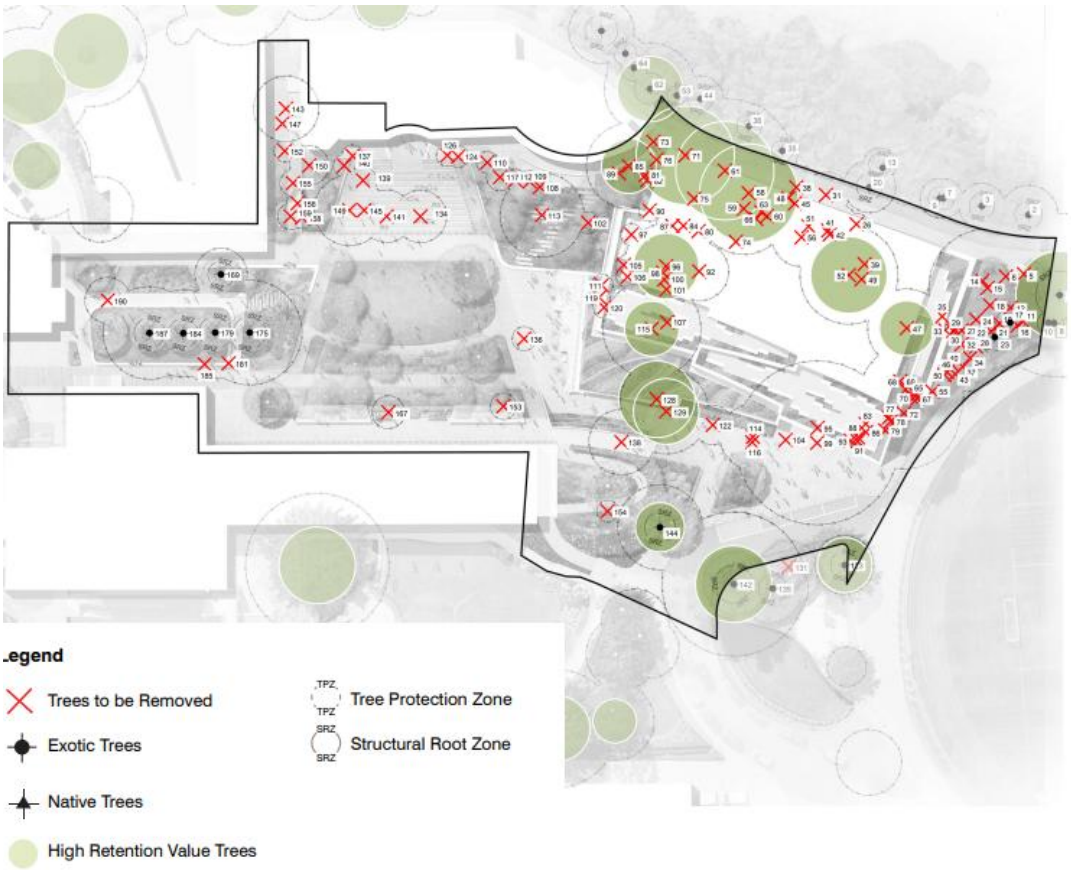

Figure 2: *Existing trees to be retained/removed (source: T.C.L, Landscape Architecture Development Application Report)*

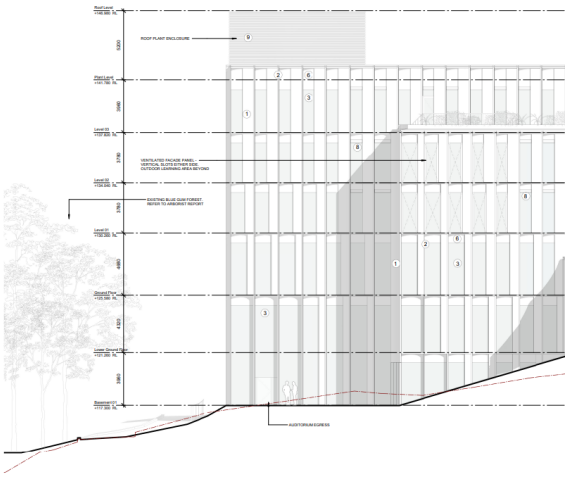

Figure 3: *Elevation West (source 3XN, Architectural Plans)*

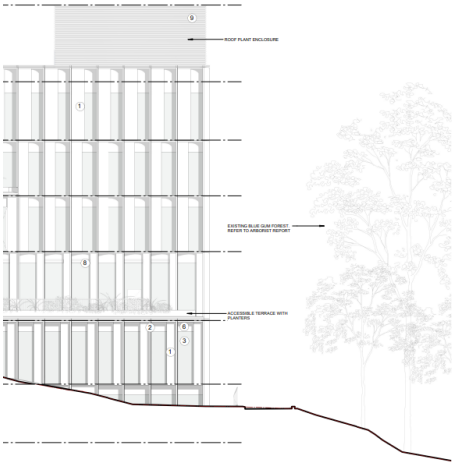

Figure 4*: Elevation East (source 3XN, Architectural Plans)*

B. Visual impact, setback and materials & finishes

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).

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 against a backdrop of lighter vegetation or sky.

It is recommended that consideration be given to introducing a setback from the northern boundary to reduce the visual impact of the plant enclosure. In addition, 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.

C. Environmental considerations

i. 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.

ii. 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 reflective materials and minimise glass as glare can impact neighbouring residents.

iii. 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.

D. Safety

- 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.

2. Landscape

A. SEARS – 7. Trees and Landscaping

The proposal has been reviewed against the Secretary's Environmental Assessment Requirements (SEARS), particularly in relation to landscape design, tree retention, and arboricultural impact. The following issues have been identified:

i. 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.

ii. 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.

B. Appendix EE – ESD Report and Appendix FF - Green Star Score Card

Appendix EE – ESD Report (Part 6.7.2 Landscape Selection) and Appendix FF – Green Star Scorecard (Connection to Nature) fail to demonstrate compliance with the following requirements:

i. The landscape proposal does not specify the number and proportion of native and indigenous species included.

ii. A sub-soil irrigation system must be provided for all non-native planting areas and for planting located above structures.

iii. 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.

C. Tree removal & impacts and Part 13 Tree & Vegetation Preservation of KDCP

i. 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.

ii. Arboricultural Impact Assessment (AIA) report (Appendix R) fails to provide insufficient information and accurately assess impacts on retained trees:

- Proposal includes the retention of T123, T142, T169, T175, and T180 all of these trees will have major encroachments into (TPZ) and some encroachments into their (SRZ). AIA does not provide enough information to allow retention of these trees.

  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.

- 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.

D. 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.

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.

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.

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 current plan uses unclear symbols and lacks tree numbering, making cross-referencing with the AIA difficult. Further detailed information is necessary for a proper assessment of the landscape and tree retention outcomes.

3. Ecology

A. Streamlined Biodiversity Development Assessment Report (SBDAR)

The Streamlined Biodiversity Development Assessment Report (SBDAR) has been reviewed in support of the SSD application for the Pymble Ladies’ College Secondary Innovation Precinct, located at 20 Avon Road, Pymble. The report has been prepared in accordance with the Biodiversity Conservation Act 2016 (BC Act), Biodiversity Conservation Regulation 2017, and the Biodiversity Assessment Method (BAM), using the streamlined pathway applicable to small area developments below the clearing threshold.

The subject land supports approximately 0.19 hectares of vegetation consistent with Plant Community Type (PCT) 3136 – Blue Gum High Forest (BGHF), which is listed as a Critically Endangered Ecological Community (CEEC) under the BC Act. BGHF is also recognised as a Serious and Irreversible Impact (SAII) entity under the BioNet Threatened Biodiversity Data Collection. Given the sensitivity of this community, avoidance of impact is a key consideration under the BAM.

The SBDAR states that complete avoidance of impacts to 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.

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 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.

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.

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.
- 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.

B. Request for Revised Vegetation Management Plan

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.

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 revised VMP must be prepared in accordance with the Guidelines for Vegetation

Management Plans published by the NSW Office of Water. This includes, 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.

4. Engineering

The proposal is not supported. Refer to recommendations below.

A. Water Management (Part 24 of KDCP)

A stormwater management plan has been submitted and prepared by BG&E.

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.

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 storage volumes of OSD 1 and OSD 2 are 235m^3 and 45m^3 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.

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.

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.

Part 24D.2 and Part 24E.1 Flood Studies and Design Procedures

A Flood Risk Management Assessment has been prepared by Arup Australia Services Pty Ltd for the Secondary Innovation Precinct (SIP) development at Pymble Ladies' College.

The site is situated on a local high point and is not located within a documented floodplain. It is not affected by mainstream flooding associated with nearby watercourses, including under the 1% AEP event. Flooding is limited to shallow, locally generated rainfall runoff and minor overland flows. A detailed topographic and drainage review, supported by LiDAR data and the Blackbutt Creek Flood Risk Management Study, confirms the site's flood risk is minimal.

Flood mitigation measures incorporated include:

- A stormwater drainage design with grading that directs runoff away from building entrances.
- Installation of an On-site Stormwater Detention (OSD) tank to manage and limit peak stormwater flows.
- Drainage infrastructure designed to safely convey overland flows without increasing flood risk to adjacent properties.
- The flood risk is classified as low, with no impact on surrounding properties or flood behaviour, and the site is considered outside the scope of flood-prone land controls under the Ku-ring-gai DCP.

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.

B. 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 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

C. Geotechnical Investigation

Geotechnical investigation report has been prepared by JK Geotechnics. The investigation included the drilling of four boreholes (BH1 to BH4) using diamond coring techniques, installation of three Groundwater monitoring wells were installed within boreholes (BH1, BH2 and BH4) and laboratory testing of selected samples. Boreholes were drilled to depths ranging between 6.1 m and 18.08 m.

Groundwater seepage was not observed during the drilling process. No permanent groundwater was observed from the ground monitoring wells.

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 proposal is approved by NSW DPI Office of Water.

Prior to excavation commencing, dilapidation reports should be completed on adjoining structures and infrastructure.

D. Recommendations

The proposed development cannot be fully assessed until the following information has been submitted.

1. Water Management

i. 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.

ii. No clarification has been provided as to the purpose of the proposed rainwater tank given that a retention component would also be required.

iii. Council's OSD Calculation Sheet is to be submitted to confirm the OSD site storage requirements have been met.

iv. No stormwater disposal system has been submitted for the basement level.

v. No supporting calculation for the pump-out pit based on the 100 year 2 hour storm has been submitted.

vi. Stormwater design does not show the rising main from the pump-out tank directed to the on-site detention tank.

5. Traffic

A. Parking Provision and Traffic Generation

Since there is no increase in student or staff number are proposed, no operational traffic impacts are expected, only minor impacts to on-site parking. Furthermore, clarification or additional information shall be provided on the allocation of the on-site parking spaces and impacts of those spaces.

Section 3.2.1. (Student and Staff Numbers) of the Transport Impact Assessment (TIA) states that the proposal consolidates existing facilities at the school, and no increase in students or staff numbers is planned. As a result, no increased traffic movements are expected. This is agreed.

Section 3.2.2. (Hours of Operation) of the Transport Impact Assessment notes that apart from weekday operation during school terms, the facilities may be open on Saturdays and Sundays for special events, and for activities during school holidays. Section 3.6.3. (Internal layout) of the Environmental Impact Statement outlines the building layout, and notes that the basement level will contain the auditorium, which will be a teaching space comprising of 327 retractable seats in a university-style lecture theatre. Section 3.11. (Operation) of the Environmental Impact Statement (EIS) clarifies that robotics competitions may be held intermittently during weekends or holidays, and that these competitions will take place in the auditorium, taking advantage of its retractable seating.

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. 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.

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 without relying on surrounding streets.

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.

B. Construction Traffic Management

An indicative Construction Traffic Management Plan (CTMP) has been submitted as part of the SSD Development.

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.

During construction, it is anticipated that the largest vehicle would be a 12.5m long Heavy Rigid Vehicle.

Construction vehicles will access the site via Pacific Highway, via Livingstone Avenue, Everton Street and onto Avon Road. All construction traffic will proceed down through the existing private service road of the Gate 2 carpark and directly to the SIP site.

The CTMP states that construction staff will be informed of the limited number of parking spaces during induction and encouraged to utilise public transport, carpool, and walk/cycle to work if practical. Construction staff will be actively discouraged from parking in the surrounding on-street bays to retain the availability of the spaces for residents/school staff. There will however be some car parking spaces provided for construction staff within the on-site laydown area.

No works zone is proposed as it is anticipated that all construction related works will occur within the site.

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, stockpiles and all necessary tree protection fencing.

C. Recommendations

The proposed development cannot be fully assessed until the following information has been submitted.

1. Car Parking/ Vehicular Access & Traffic Assessment

i. The proposed development will result in a permanent loss of 4 on-site car parking spaces. Clarification should be provided as to the current allocation of the 4 car parking spaces that will be removed, and mitigation measures.

ii. 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.

iii. Clarification is sought as to the remaining on-site parking will be available, and would be adequate to cater for, special events without relying on surrounding streets.

iv. 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.

6. Noise and Land Contamination Impacts

A. Noise

Following a review of the Architectural Plans (prepared by 3XN Australia Pty Ltd, Issue 4, dated 26/05/2025) and the Acoustic Assessment Report (prepared by Pulse White Noise Acoustics, Rev R4, dated 05/06/2025), the following comments are made for consideration.

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
- 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;
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
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 noise criteria, particularly the night-time trigger level of 35 dB(A) LAeq(15min).

B. Land Contamination

Following a review of the Preliminary Site Investigation (PSI) Report (prepared by ECON Environmental Pty Ltd, Revision C dated 19/03/2025), the following comments are provided for consideration.

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.

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.

7. 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. 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.
