



Scoping Report

Grey House Precinct, Pymble Ladies College

20 Avon Road, Pymble (Lot 1 DP 69541)

**Prepared by Willowtree Planning Pty Ltd on behalf
of Pymble Ladies College**

April 2021

SCOPING REPORT

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SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

TABLE OF CONTENTS

PART A	PRELIMINARY	4
1.1	Overview	4
1.2	Scoping Meeting.....	4
1.3	Previous State Significant Development	5
PART B	SITE ANALYSIS	7
2.1	Site Location And Characteristics	7
2.2	Local Context	9
2.3	School History	10
2.4	Existing Use And Population.....	10
2.5	Community Uses Of The College	10
PART C	PROPOSED DEVELOPMENT	11
3.1	Aims And Objectives.....	11
3.2	Description Of The Proposal.....	11
PART D	LEGISLATIVE AND POLICY FRAMEWORK	13
4.1	Statutory Planning Framework Overview.....	13
4.2	Environmental Planning & Assessment Act 1979.....	13
4.3	Environmental Planning & Assessment Regulation 2000.....	13
4.4	Biodiversity Conservation Act 2016 And Regulation 2017	13
4.5	Rural Fires Act 1997	15
4.6	State Environmental Planning Policy (State And Regional Development) 2011.....	16
4.7	State Environmental Planning Policy No.55 – Remediation Of Land.....	16
4.8	State Environmental Planning Policy (Educational Establishment And Child Care Facilities) 2007.....	17
4.9	Ku-Ring-Gai Local Environmental Plan (Local Centres) 2012.....	18
4.10	Draft Environmental Planning Instruments	20
4.11	Ku-Ring-Gai Local Centres Development Control Plan	20
PART E	COMMUNITY CONSULTATION	21
PART F	ENVIRONMENTAL ASSESSMENT	22
PART G	CONCLUSION	25

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

FIGURES

Figure 1. SSD 5314 Stamped Site Plan (PMDL 2012)	6
Figure 2. SSD 5314 MOD 1 Stamped Site Plan (PMDL 2012)	6
Figure 3. Cadastre Map (SIX Maps 2021)	7
Figure 4. Aerial of the Site (SIX Maps 2021).....	8
Figure 5. Site Plan (BVN 2021).....	8
Figure 6. Local Context (SIX Maps 2021)	9
Figure 7. North Elevation (BVN 2021)	12
Figure 8. East Elevation (BVN 2021)	12
Figure 9. Concept Envelope (BVN 2021)	12
Figure 10. Biodiversity Values Map (NSW Government 2021)	15
Figure 11. Bushfire Prone Land Map (Ku-ring-gai Council 2021)	16
Figure 12. Zoning Map (NSW Legislation 2021)	19

TABLES

Table 1. Development Standards and Provisions	19
Table 2. Environmental Risk Assessment	22

APPENDICES

Appendix 1	Preliminary Architectural Drawings
Appendix 2	Preliminary Cost Report

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

PART A PRELIMINARY

1.1 OVERVIEW

This Scoping Report has been prepared by Willowtree Planning on behalf of Pymble Ladies College (the College) and is submitted to the NSW Department of Planning, Industry and Environment (DPIE) in support of a formal request for the Secretary's Environmental Assessment Requirements (SEARs).

This request for SEARs is made in relation to the site of Pymble Ladies College located at 20 Avon Road, Pymble. Whilst the overall site comprises multiple lots, the proposal specifically relates to Lot 1 DP 69541.

The proposal includes the redevelopment of the Grey House Precinct within the grounds of the established College. The key objective of the proposal is to provide modern teaching and learning facilities to support the ongoing evolution of the College in accordance with the needs of students, staff and the broader community.

Pursuant to this application, the Grey House Precinct is proposed to incorporate Junior School classrooms (Years 5 and 6), Science, Technology Engineering and Mathematics (STEM) labs, health and wellbeing facilities (consulting rooms and wards), a dance academy, Out of School Hours Care (OSHC) facilities, an Early Learning Centre (ELC), and a range of outdoor learning spaces. The proposed development would replace existing temporary (demountable) teaching spaces, providing a better environment for both students and teachers.

It is noted that whilst there is a broader vision for the progressive renewal and expansion of the College to respond to needs as they evolve, this proposal has been designed as a standalone project. Separate applications would be subsequently submitted as needs emerge.

The proposal is classified as State Significant Development (SSD) pursuant to Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). Clause 15 of Schedule 1 relates to Educational Establishments and subclause 15(2) provides that *development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing School* is SSD.

This document provides a brief overview of the proposal and the planning framework that applies, to enable the issue of the SEARs that will guide the preparation of a formal Environmental Impact Statement (EIS) for the development.

It is therefore requested that DPIE issue formal SEARs to support the preparation of the EIS.

1.2 SCOPING MEETING

A preliminary Scoping Report was issued to DPIE on 19 March 2021 and a Scoping Meeting was then held with DPIE on 01 April 2021. Following this meeting, on 06 April 2021 DPIE provided email correspondence recommending that the proposal be assessed as SSD and formally inviting the submission of a SEARs Request.

It is noted that this updated Scoping Report provides some additional details in response to those matters discussed with DPIE during the Scoping meeting, namely:

- The relationship of the subject proposal with the previous Master Plan has been further explained in **Section 1.3** of this Report.
- The intended use of the proposed health and wellbeing facilities has been clarified in **Section 3.2** of this Report.
- The proposed capacity of the ELC has been confirmed in **Section 3.2** of this Report, and it is also clarified that there is no existing ELC on the site.

No amendments, other information or drawing updates, were requested by DPIE.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

1.3 PREVIOUS STATE SIGNIFICANT DEVELOPMENT

The Minister for Planning and Infrastructure granted consent on 09 July 2013 to SSD 5314 for the Concept Master Plan and Stage 1 Built Form for Pymble Ladies College, including:

- A concept proposal for the redevelopment of school facilities over four (4) stages, including:
 - Demolition of existing swimming pool;
 - Construction of three (3) new buildings on site with a combined Gross Floor Area (GFA) of approximately 5,596m², including an Aquatic and Fitness Centre, a Dining and Function Centre, and a Healthcare Centre;
 - Use of Aquatic and Fitness Centre by school and community;
 - Use of Dining and Function Centre by school and community;
 - Minor upgrade of existing Jeanette Buckham PE Centre;
 - Relocation of existing Mollie Dive Field with car parking below for 232 vehicles and removal of 36 existing car parking spaces;
 - Landscaping and utilities; and
 - No additional staff or students.
- Stage 1 works, including:
 - Demolition of existing swimming pool;
 - Construction of an Aquatic and Fitness Centre;
 - Landscaping and utilities;
 - Relocation of existing Mollie Dive Field;
 - Use of new Aquatic and Fitness Centre by school and community; and
 - Minor upgrade of existing Jeanette Buckham PE Centre.

Consent to modify SSD 5314 was subsequently granted on 15 October 2013. The modification was limited to a height increase of 700mm for Mollie Dive Field (RL 119.10m increased to RL 119.80m) in order to incorporate a greater slope on the field and ensure adequate drainage while retaining the level of the car park below.

It is noted that SSD 5314 (including as modified) did *not* include the Grey House Precinct, being the subject of this Scoping Report. Accordingly, the current proposal is distinct from the previously-approved Master Plan and associated stages.

Extracts from the Stamped Plans for SSD 5314 and MOD 1 are shown in **Figures 1** and **2**, and demonstrate the separation between the previously-approved Master Plan and the Grey House Precinct.

Further, it is noted that only part of the Master Plan was built, being the Aquatic and Fitness Centre, car park, and separation of the back entry. The Dining and Function Centre was *not* built and is now not required due to capacity in other areas of the College for functions and the conversion of part of the existing hall into a boarding dining room. The Healthcare Centre was *not* built and is now proposed to be incorporated as part of the Grey House Precinct (referred to as 'health and wellbeing facilities' within this Report).

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
 20 Avon Road, Pymble (Lot 1 DP 69541)

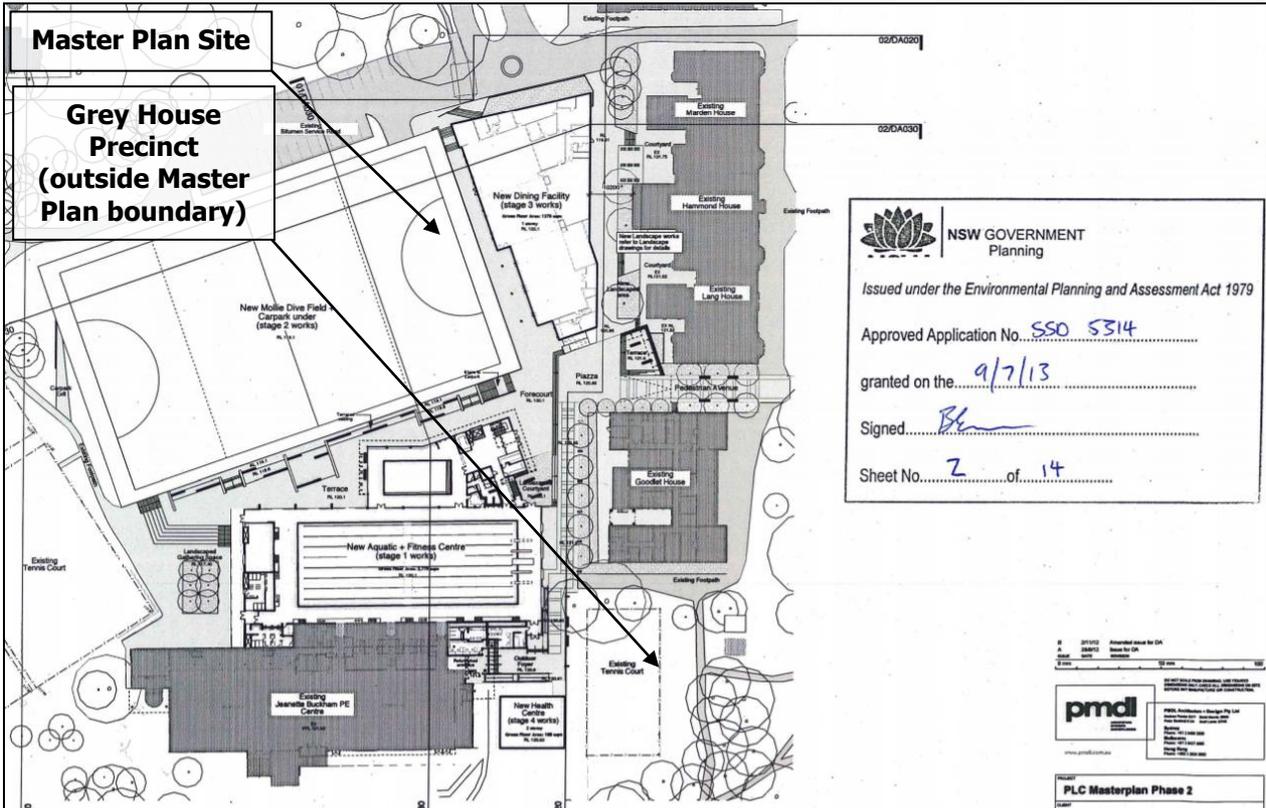


Figure 1. SSD 5314 Stamped Site Plan (PMDL 2012)

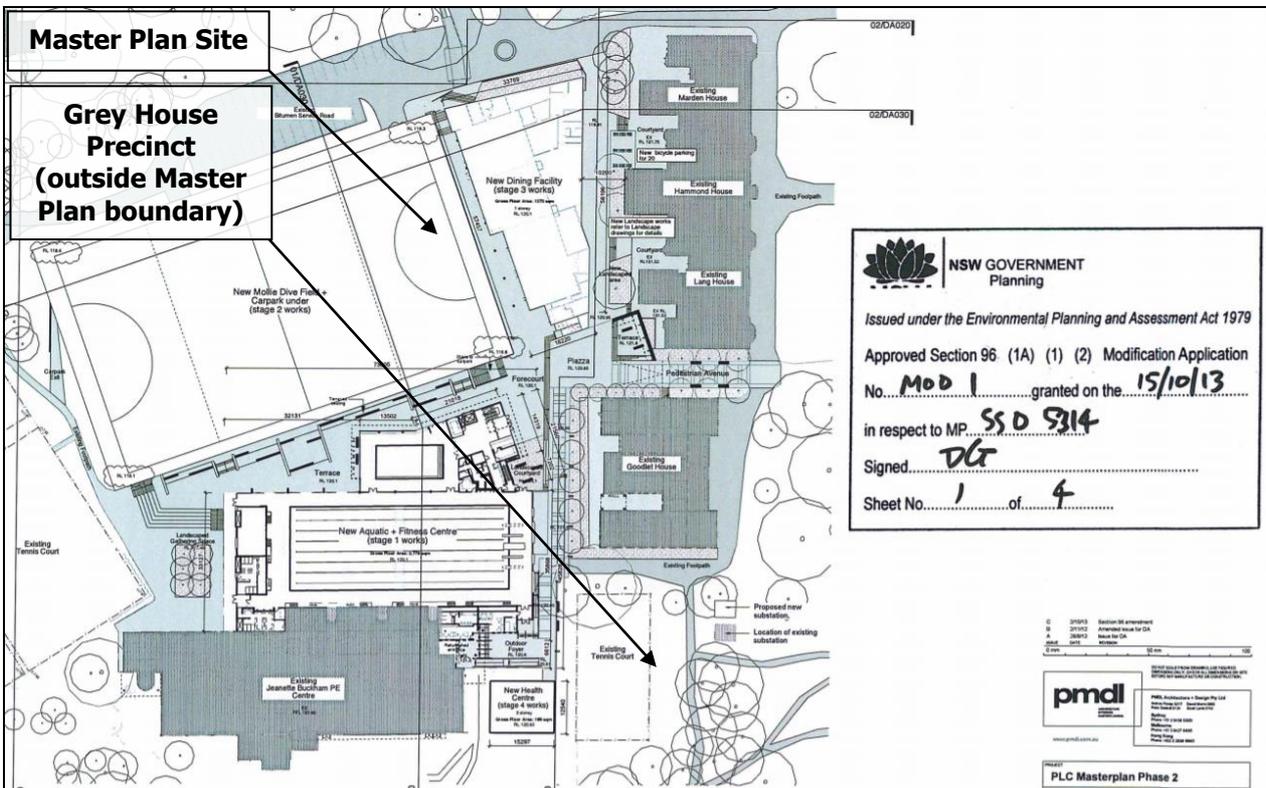


Figure 2. SSD 5314 MOD 1 Stamped Site Plan (PMDL 2012)

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

PART B SITE ANALYSIS

2.1 SITE LOCATION AND CHARACTERISTICS

The site of Pymble Ladies College is located at 20 Avon Road, Pymble. Whilst the overall site comprises multiple lots, the proposal specifically relates to Lot 1 DP 69541.

The College site occupies a total area of approximately 20 hectares (ha) and exhibits street frontages to Avon Road to the north and west. The eastern site boundary directly adjoins the rear gardens of the dwelling houses and residential flat buildings in Pymble Avenue, and the southern site boundary adjoins Avondale golf course.

In its existing state the site comprises multiple school buildings and sports facilities, set within landscaped gardens with some areas of densely vegetated bushland. Vehicular access to the College is facilitated via separate ingress and egress driveways on both the northern and western sectors of Avon Road, and pedestrian access is similarly available via multiple gates along the northern and western sectors of Avon Road.

The area of the site forming the specific focus of this Scoping Report is known as the Grey House Precinct. The Grey House Precinct is situated in the central-southern portion of the College site, where it is adjoined by the main College to the north, the eastern site boundary, the Centenary Sports Precinct to the south, and the boarding precinct to the west. The Grey House Precinct currently incorporates temporary (demountable) teaching spaces, lawn area, pedestrian paths and some trees.

The site and existing development are shown in **Figures 3, 4** and **5** below.

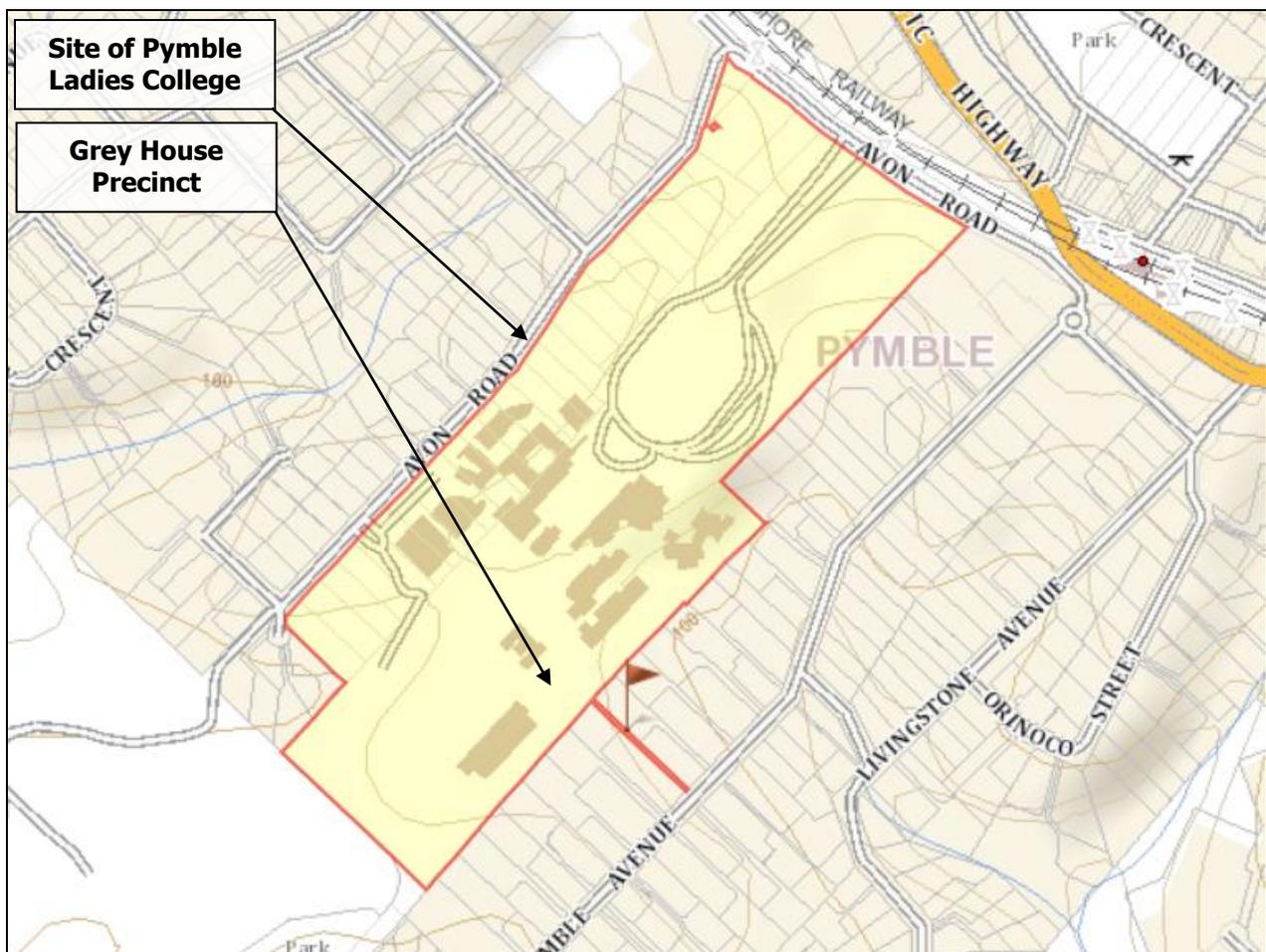


Figure 3. Cadastre Map (SIX Maps 2021)

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)



Figure 4. Aerial of the Site (SIX Maps 2021)



Figure 5. Site Plan (BVN 2021)

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

2.2 LOCAL CONTEXT

The site is located in the suburb of Pymble, which forms part of the Ku-ring-gai Local Government Area (LGA) in the north of Greater Sydney.

The surrounding context exhibits a leafy suburban character, with surrounding development comprising primarily of detached dwelling houses set within generous gardens and along tree-lined streets. Moderately-scaled residential flat buildings of recent construction are generally concentrated along the railway line. Local shops, generally contained within two (2) storey attached buildings, are also situated in proximity to the train station along Pacific Highway and on the northern side of the railway.

There are multiple open spaces, bushland areas and riparian corridors throughout the surrounding area, including Avondale golf course adjoining the southern site boundary, Sheldon Forest and Avondale Dam to the west, and Robert Pymble Park to the north.

The site is highly accessible by public transport, being approximately 200m walk from Pymble train station. Bus stops along Pacific Highway provide bus connections to Macquarie University and Hornsby. The site is also accessible via the established road network, being in immediate proximity to the Pacific Highway and near to its intersection with Ryde Road/Mona Vale Road.

The local context is shown in **Figure 6**.

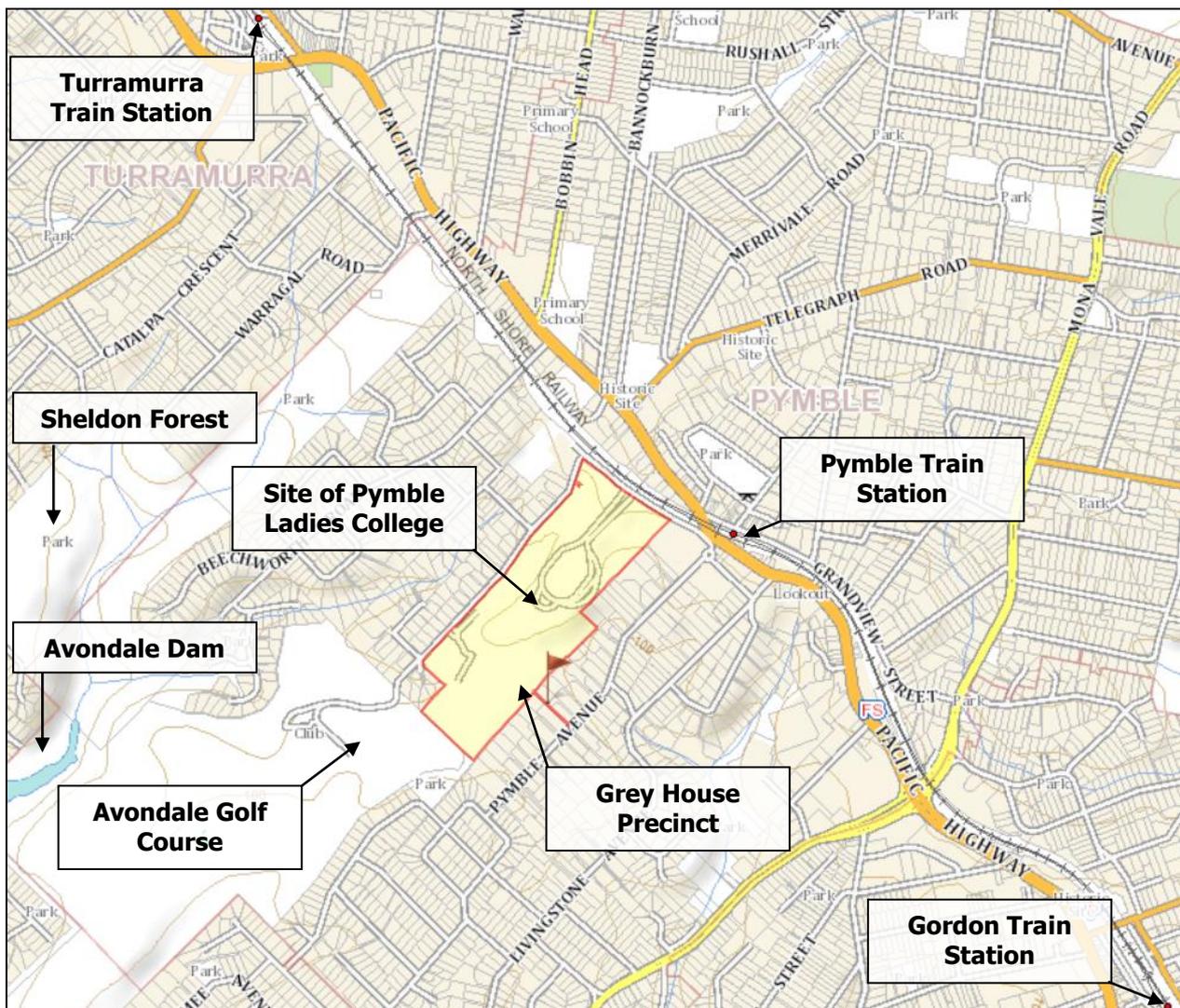


Figure 6. Local Context (SIX Maps 2021)

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

2.3 SCHOOL HISTORY

Pymble Ladies College was founded as Presbyterian Ladies' College Pymble in 1916, and on 31 July 1919 was dedicated as the property of the Presbyterian Church of NSW 'for the higher education of girls and their moral and religious upbringing'. After the establishment of the Uniting Church in Australia in 1977, the College became Pymble Ladies' College.

Over the decades since its foundation, the College has been significantly extended to provide a growing number of students and boarders with an expanded number and enhanced quality of academic and co-curricular facilities and programs.

2.4 EXISTING USE AND POPULATION

The College is a non-selective, independent school for girls from Kindergarten to Year 12, with Boarding available from Year 7.

The College currently accommodates a population of 2,259 students, 120 boarders and 400 staff.

It is noted that there is currently *no* ELC on the site.

The standard operating hours of the College are 7:30am to 5:30pm Monday to Friday, and standard teaching hours are 8:15am to 3:20pm Monday to Friday.

Co-curricular activities within the College grounds take place between 6:30am to 8:00am and 3:00pm to 6:30pm Monday to Friday (5:30am to 8:00am for swim squads) and 7:00am – 12:00pm Saturdays, with no activities on Sundays. Examples of co-curricular activities include band, instrument lessons, choir, drama, art, robotics, dance, rowing, tennis, athletics, swimming, diving, gymnastics, and over 50 choices of activities in addition to seasonal sports including hockey, netball, basketball, rugby and soccer.

Boarding occurs on a 24/7 basis.

2.5 COMMUNITY USES OF THE COLLEGE

As well as providing academic and co-curricular activities for students and boarders, the College includes facilities and services that are accessible to the broader community. These include the following:

- Swimming Centre, including swimming carnivals for other local schools, learn-to-swim for the broader community, and water polo competitions.
- Sports facilities for local sports groups, including the Gymnasium for indoor netball and basketball.
- Sports fields.
- Chapel, for special services.
- Theatre, extended to the local community for events.
- The College also serves as a host venue for a number of interschool competitions such as debating.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

PART C PROPOSED DEVELOPMENT

3.1 AIMS AND OBJECTIVES

The following objectives form the basis of the proposed development for new facilities within the grounds of the existing College:

- Create a high-quality teaching and learning environment for students and staff;
- Establish additional floor space and new facilities for indoor and outdoor learning;
- Introduce early learning opportunities for pre-Kindergarten aged children;
- Deliver enhanced public benefit by opening many of the new facilities for use by the broader community;
- Enhance the amenity and function of an underutilised area of land within the College grounds;
- Integrate with and complement the existing College facilities;
- Minimise environmental and amenity impacts; and
- Ensure development is compatible with surrounding development and the local context.

The site and proposed design are considered to meet the objectives of the project as it allows for the development of new and enhanced facilities for educational and co-curricular purposes, on land that forms part of the established College.

3.2 DESCRIPTION OF THE PROPOSAL

The proposal includes the redevelopment of the Grey House Precinct within the grounds of the established College. The Grey House Precinct is proposed to incorporate the following:

- Junior School classrooms (Years 5 and 6);
- Science, Technology Engineering and Mathematics (STEM) labs;
- Health and wellbeing facilities (consulting rooms and wards);
- Dance academy;
- Out of School Hours Care (OSHC) facilities;
- Early Learning Centre (ELC); and
- Outdoor learning spaces.

The proposed development would replace existing temporary (demountable) teaching spaces, providing a better environment for both students and teachers.

The proposal would provide facilities to support the *existing* student population of the College and would not provide for an increase in student or staff numbers for Kindergarten to Year 12. The proposed ELC would however accommodate a new pre-Kindergarten stream, with capacity for 90 children (it is noted there is currently *no* ELC on the site). It is anticipated that a significant proportion of the ELC places would be occupied by children of staff at the College; with further details and surveys to be provided as part of the SSDA.

The intention would be for the ELC, Dance Academy and OSHC holiday care program, to be available for use by the broader community.

The health and wellbeing facilities would exclusively serve students of the College (no use by the general public). The proposal would support the co-location of physical and mental health services, in recognition of the holistic nature of health and wellbeing.

The envisaged built form would comprise up to five (5) storeys, stepped down the slope in accordance with the natural topography of the land (noting that earthworks would be required to provide the lowest floor below existing natural ground level). Outdoor spaces would be provided at ground level and on upper-level balconies/rooftops in order to create transitional indoor/outdoor learning environments.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

The proposed concept development is shown in **Figures 7-9**, and further details are provided in the Concept Architectural Drawings at **Appendix 1**.

It is noted that whilst there is a broader vision for the progressive renewal and expansion of the College to respond to needs as they evolve, this proposal has been designed as a standalone project. Separate applications would be subsequently submitted as needs emerge.

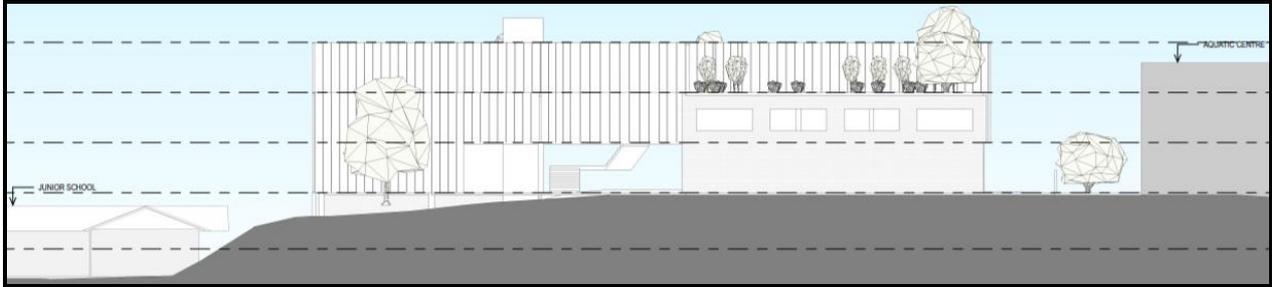


Figure 7. North Elevation (BVN 2021)

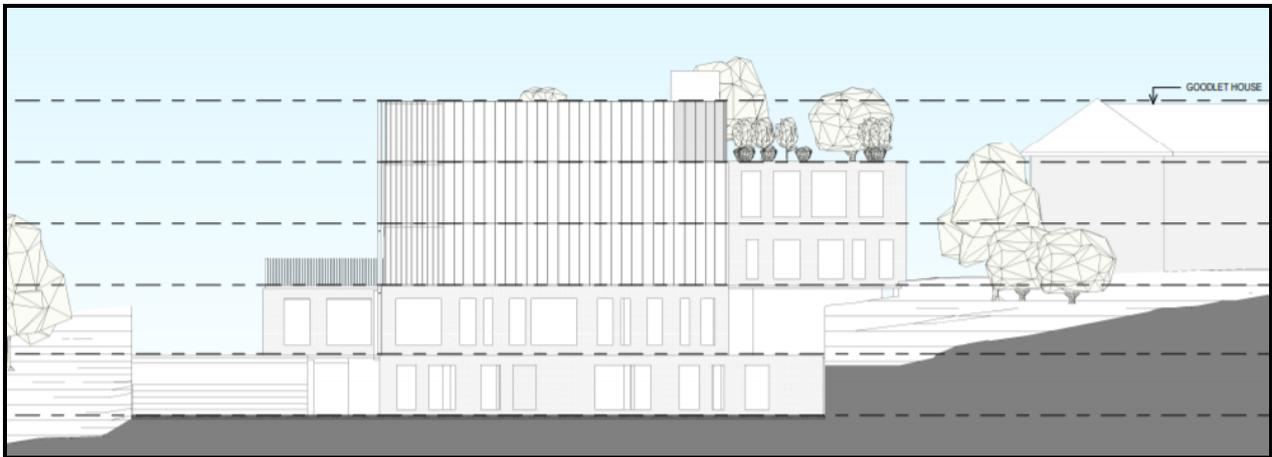


Figure 8. East Elevation (BVN 2021)



Figure 9. Concept Envelope (BVN 2021)

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

PART D LEGISLATIVE AND POLICY FRAMEWORK

4.1 STATUTORY PLANNING FRAMEWORK OVERVIEW

This Part of the Scoping Report assesses and responds to the legislative and policy requirements for the project in accordance with the *Environmental Planning and Assessment Act 1979* (EP&A Act). Relevant legislation, Environmental Planning Instruments (EPIs) and policies include:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Biodiversity Conservation Act 2016*
- *Biodiversity Conservation Regulation 2017*
- *Rural Fires Act 1997*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *Ku-ring-gai (Local Centres) Local Environmental Plan 2012*
- *Ku-ring-gai Local Centres Development Control Plan*

4.2 ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979

The EPA&A Act is the overarching governing document for all development in NSW. Pursuant to Section 4.36(2), the EP&A Act provides that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

The proposed development has been identified as SSD under the SRD SEPP as outlined in **Section 4.6** below.

Pursuant to Section 4.12(8) of the EP&A Act:

A development application for State significant development or designated development is to be accompanied by an environmental impact statement prepared by or on behalf of the applicant in the form prescribed by the regulations.

Accordingly, this Scoping Report precedes the required EIS.

4.3 ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2000

The *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) prescribes requirements for an EIS in Schedule 2.

Pursuant to Schedule 2 Clause 3, prior to an EIS being prepared, a written application must be made to obtain SEARs. This application forms the required request for SEARs.

4.4 BIODIVERSITY CONSERVATION ACT 2016 AND REGULATION 2017

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) aim to *maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.*

Part 7 of the BC Act and Regulation relate to biodiversity assessment and approvals under the Planning Act (meaning the EP&A Act). Pursuant to Section 7.2(1) of the BC Act, *development or an activity is likely to significantly affect threatened species if:*

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

- (a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or*
- (b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or*
- (c) it is carried out in a declared area of outstanding biodiversity value.*

The proposal relates to an area of the College site that is primarily cleared, consisting of mown lawns and pedestrian paths. The site does also include some mature trees, and some trees would require removal to facilitate the proposed development. A preliminary Arborist assessment has been undertaken to assess the trees on the site, and finds that the highest 'risk priority' for any tree is 'medium'; no trees are identified as 'high', 'urgent' or 'critical' priorities. Therefore, it is considered unlikely that the site would contain any threatened species, ecological communities or habitats, that would be significantly affected by the proposal. Notwithstanding, it is acknowledged that preliminary ecological assessment would be required as part of the SSD.

With respect to subclauses (b) and (c) under Section 7.2(1) of the BC Act, it is relevant to refer to the BC Regulation. Pursuant to Clause 7.1 of the BC Regulation, proposed development exceeds the biodiversity offsets scheme threshold for the purposes of Part 7 of the BC Act if it involves:

- (a) the clearing of native vegetation of an area declared by clause 7.2 as exceeding the threshold, or*
- (b) the clearing of native vegetation, or other action prescribed by clause 6.1, on land included on the Biodiversity Values Map published under clause 7.3.*

The overall site of the College is identified as comprising 'biodiversity value' in the Biodiversity Values Map, but *no* biodiversity value is shown on the specific site of the Grey House Precinct (refer **Figure 10**). As such, the proposal would not involve any action on land included in the Biodiversity Values Map.

For land not included on the Biodiversity Values Map, the thresholds under Clause 7.2 of the BC Regulation apply. The site is not subject to a minimum lot size, and therefore the actual size of the allotment applies, which is in the order of 14.5ha. The applicable area of clearing (for land less than 40ha but not less than 1ha) would be 0.5ha of clearing. The site of the Grey House Precinct is already largely cleared, and the proposal would not require clearing of 0.5ha of native vegetation.

Therefore, the proposal would *not* trigger the biodiversity offsets scheme threshold.

Accordingly, the *only* potential trigger for 'development or activity likely to significantly affect threatened species', would be under subclause (a) under Section 7.2(1) of the BC Act. As outlined above, this is considered unlikely, subject to preliminary ecological assessment being completed.

It is noted that Section 7.9 of the BC Act requires a Biodiversity Development Assessment Report (BDAR) to accompany any SSD *unless* the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values'. Subject to the findings of a Preliminary Ecological Assessment, it is requested that the requirement for a BDAR is waived.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

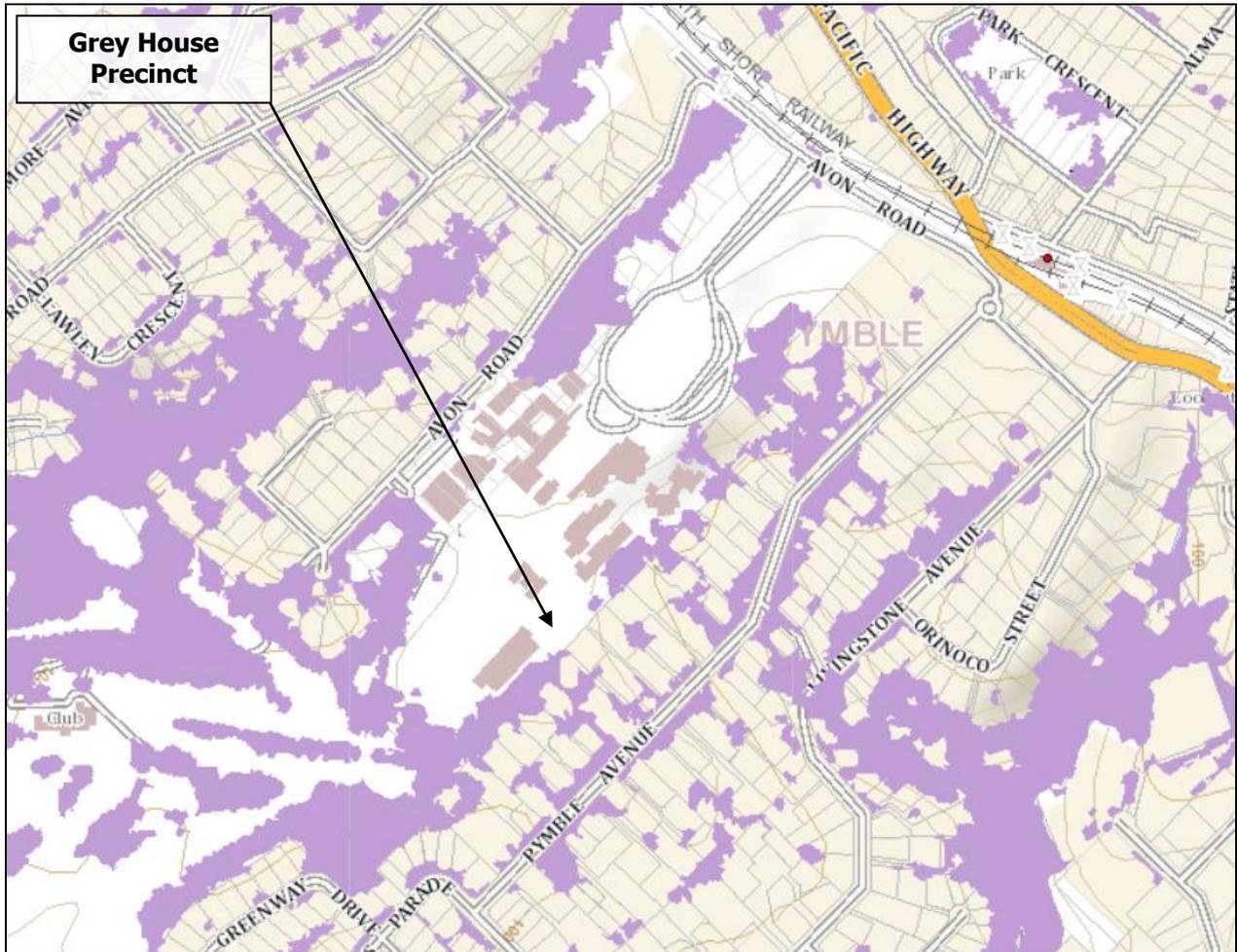


Figure 10. Biodiversity Values Map (NSW Government 2021)

4.5 RURAL FIRES ACT 1997

The *Rural Fires Act 1997* (Rural Fires Act) aims to prevent, mitigate and suppress bushfires in order to protect people, infrastructure and the environment.

Pursuant to Section 100B, on bushfire prone land a Bush Fire Safety Authority is required for development for a Special Fire Protection Purpose, including a school. The site comprises designated bushfire prone land based on the Rural Fire Service (RFS) Bushfire Prone Land Map, but as shown in Council's mapping (refer extract at **Figure 11**), the Grey House Precinct (being the specific subject of this Report) is not bushfire prone land and is considerably distanced from that portion of the site designated as such.

Further consideration to bushfire is therefore not considered necessary to support this application.

Further, pursuant to Section 4.41 of the EP&A Act, a Bushfire Safety Authority is *not* required for SSD. To the same effect, Section 4.46 of the EP&A Act provides that Integrated Development does *not* apply to SSD.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

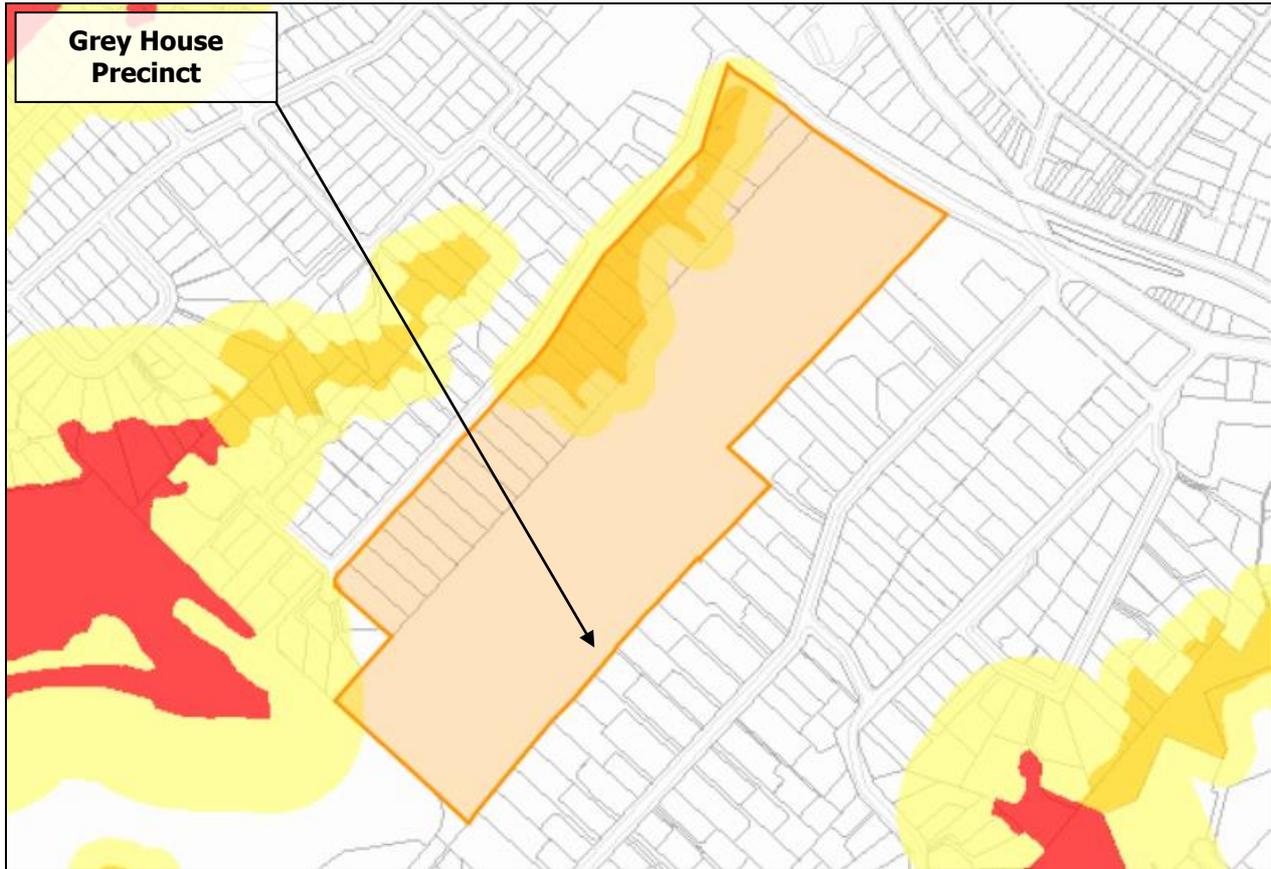


Figure 11. Bushfire Prone Land Map (Ku-ring-gai Council 2021)

4.6 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Proposals involving activities that are listed in Schedule 1 of the SRD SEPP are identified as being SSD. Clause 15 of Schedule 1 relates to Educational Establishments and states as follows:

15 Educational establishments

- (1) Development for the purpose of a new school (regardless of the capital investment value).
- (2) **Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school.**
- (3) Development for the purpose of a tertiary institution (within the meaning of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017), including associated research facilities, that has a capital investment value of more than \$30 million.

The proposed development for alterations and additions to an existing school, has a Capital Investment Value (CIV) of more than \$20 million (refer Preliminary Cost Report at **Appendix 2**). The proposal would therefore constitute SSD in accordance with Schedule 1 Clause 15(2) of the SRD SEPP.

4.7 STATE ENVIRONMENTAL PLANNING POLICY NO.55 – REMEDIATION OF LAND

Clause 7(1) of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55) requires that a consent authority must not grant development consent on land unless:

- a) it has considered whether the land is contaminated, and

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

- b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

The site has been used as an Educational Establishment since 1916, and therefore is anticipated to be historically free of contamination. Notwithstanding, it is acknowledged that a Preliminary Site Investigation would be required to support the SSD.

4.8 STATE ENVIRONMENTAL PLANNING POLICY (EDUCATIONAL ESTABLISHMENT AND CHILD CARE FACILITIES) 2007

State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (E-SEPP) aims to facilitate the effective delivery of educational establishments and early education and care facilities across the State.

Part 4 of the E-SEPP relates specifically to schools and identifies Prescribed Zones within which, pursuant to Clause 35(1), development for a school may be carried out by any person with development consent. Clause 35(3) also permits development for the purpose of a school within *any* zone if it is within the boundaries of an existing school. The SP2 zone (within which the site is located) is a Prescribed Zone for the purpose of Part 4 of the E-SEPP and the proposal would also be carried out within the boundaries of an existing school. Therefore the proposed development is permissible with consent.

Also of relevance, Clause 35(5) makes provision for the use of a school by the broader community, as follows:

- (5) A school (including any part of its site and any of its facilities) may be used, with development consent, for the physical, social, cultural or intellectual development or welfare of the community, whether or not it is a commercial use of the establishment.*

The intended use of the ELC, Dance Academy and OSHC holiday care program, by the broader community, would therefore be permitted with consent.

Pursuant to Clause 35(6), *before determining a development application for development of a kind referred to in subclause (1), (3) or (5), the consent authority must take into consideration:*

- (a) the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4, and*
- (b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.*

The Design Quality Principles outlined in Schedule 4 relate to context, built form and landscape; sustainability, efficiency and durability; accessibility and inclusivity; health and safety; amenity; whole of life; flexibility and adaptivity; and aesthetics. The design quality principles will be considered in the design of the facility and directly responded to in the future EIS.

The proposed development would seek to satisfy Clause 35(6)(b) by allowing some of the school facilities, namely the ELC, Dance Academy and OSHC holiday care program, as referenced above, to be available for community use.

In addition, the E-SEPP makes provision for 'other' uses within a school. Of key relevance, Clause 35(10) provides that development for the purpose of a centre-based child care facility may be carried out by any person with development consent on land within the boundaries of an existing school. The proposed ELC, which forms a component of the Grey House Precinct, would therefore be permitted with consent.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

4.9 KU-RING-GAI LOCAL ENVIRONMENTAL PLAN (LOCAL CENTRES) 2012

The site is subject to the provisions of *Ku-ring-gai (Local Centres) Local Environmental Plan 2012* (KLEP2012). Relevant permissibility, development standards and provisions are summarised in the subsequent sections of this Report.

4.9.1 Zoning and Permissibility

The site is zoned SP2 Infrastructure (Educational Establishment) pursuant to KLEP2012 (**Figure 12**).

The objectives of the SP2 zone are:

- *To provide for infrastructure and related uses.*
- *To prevent development that is not compatible with or that may detract from the provision of infrastructure.*

Within the SP2 zone the following land uses are permitted *without* consent:

Nil

Within the SP2 zone the following land uses are permitted *with* consent:

Aquaculture; Environmental protection works; Flood mitigation works; Recreation areas; Roads;
The purpose shown on the Land Zoning Map, including any development that is ordinarily incidental or ancillary to development for that purpose

Within the SP2 zone the following land uses are prohibited:

Any development not specified in item 2 or 3

Accordingly, Educational Establishments (which by definition include Schools) are permitted with consent in the SP2 Zone.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

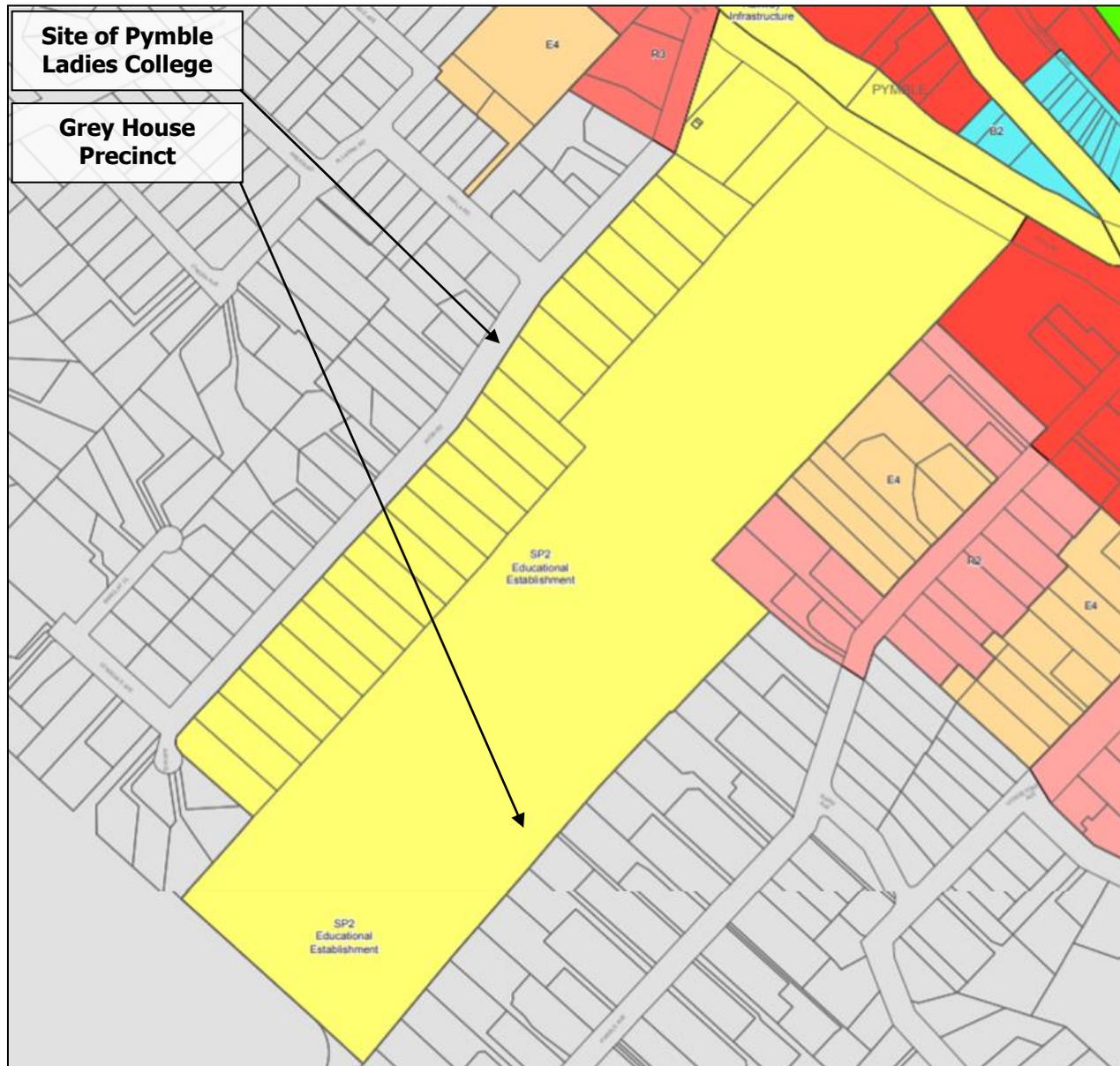


Figure 12. Zoning Map (NSW Legislation 2021)

4.9.2 Development Standards and other Relevant Provisions

The development standards and other provisions applicable to the site pursuant to KLEP2012, are outlined in the following table.

Table 1. Development Standards and Provisions	
KLEP2012 Clause	Details
Minimum Lot Size	No minimum lot size.
Maximum Building Height	No maximum building height.
Maximum Floor Space Ratio (FSR)	No maximum FSR.
Land Reservations	No land reservations.
Heritage	The site is not identified as a heritage item or conservation area.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

Table 1. Development Standards and Provisions	
KLEP2012 Clause	Details
Biodiversity	<p>Areas of biodiversity significance are identified across the site, including within the Grey House Precinct. Clause 6.3 of KLEP2012 would therefore apply.</p> <p>A preliminary Arborist assessment has been undertaken to assess the trees on the site, and finds that the highest 'risk priority' for any tree is 'medium'; no trees are identified as 'high', 'urgent' or 'critical' priorities.</p> <p>It is acknowledged that preliminary ecological assessment would be required as part of the SSD.</p>
Riparian Land	<p>Riparian land is identified in the northern region of the site and on adjoining land adjacent to a section of the western site boundary. These riparian lands are however significantly distanced from the proposed Grey House Precinct.</p>

4.10 DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No draft EPIs apply to the site.

4.11 KU-RING-GAI LOCAL CENTRES DEVELOPMENT CONTROL PLAN

Clause 11 of the SRD SEPP provides that:

Development control plans (whether made before or after the commencement of this Policy) do not apply to:

(a) State significant development

Additionally, Clause 35(9) of the E-SEPP, which relates to schools that are permitted with consent, provides that:

A provision of a development control plan that specifies a requirement, standard or control in relation to development of a kind referred to in subclause (1), (2), (3) or (5) is of no effect, regardless of when the development control plan was made.

The proposed school additions within a Prescribed Zone and within the boundaries of an existing school, is development referred to in subclauses (1) and (3), and the community use of the school facilities is referred to in subclause (5). Therefore, the provisions of a Development Control Plan (DCP) are not applicable to the proposal.

Whilst the proposal would have regard to key DCP controls, *Ku-ring-gai Local Centres Development Control Plan* (KDCP) would carry no weight in the assessment due to the status of the application as SSD and by virtue of the operation of the E-SEPP.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

PART E COMMUNITY CONSULTATION

Consultation would be undertaken with relevant the community, public authorities and Council, in accordance with the DPIE Community Consultation Guidelines.

The College is committed to engaging effectively with the local community in a meaningful, accountable and responsive way. The College will establish a community engagement policy that outlines its position and commitment to ensure community engagement is integrated into all activities. Overall, the College seeks to build relationships and strengthen its place in the community and to better understand the communities within which it is located.

The objectives for preliminary community consultation are as follows:

- Identify key community stakeholders with an interest in the project;
- Provide relevant information and advise the local community about the proposed development;
- Promote awareness and appreciation of the proposed development; and
- Provide opportunity for the local community to comment and provide feedback on the proposed development.

The key stakeholders that would be included in future consultation include, but are not limited to, the following:

- State Government Agencies;
- Ku-ring-gai Council;
- Local Elected Members;
- Neighboring residents and landowners;
- Current students, parents and Faculty members of the College;
- Former students and family of the College.

Consultation with relevant stakeholders would be undertaken whilst preparing a detailed EIS, in-keeping with DPIE's Community Consultation Guidelines.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

PART F ENVIRONMENTAL ASSESSMENT

A screening analysis of the environmental issues applicable to the proposal is presented in the table below. This risk-based analysis has been used to identify the key environmental issues for further assessment and assist the preparation of SEARs for the proposed development.

The analysis is based on preliminary environmental assessment of the site only. The EIS would fully address these items and other environmental issues relevant to the proposal.

Table 2. Environmental Risk Assessment

Issue	Analysis
Urban design, built form and site layout	<ul style="list-style-type: none">▪ The EIS would address the height, density, bulk and scale of the proposed development within the context of the existing College and surrounding locality. The proposal would clearly demonstrate how the design and layout achieve a high level of functionality and amenity for students, staff, the broader community and surrounding properties, and how the proposal integrates with the local environment.▪ Architectural and landscape design would respond to the visual character of the existing College, and would achieve visual interest whilst suitably integrating with the local context.
Community use	<ul style="list-style-type: none">▪ The proposal would seek to deliver enhanced public benefit by opening some of the new facilities, including the ELC, Dance Academy and OSHC holiday care program, for use by the broader community.▪ A Plan of Management would be provided as part of the EIS.
Environmental amenity	<ul style="list-style-type: none">▪ The EIS would assess any amenity impacts on adjoining properties and formulate mitigation measures accordingly.
Heritage	<ul style="list-style-type: none">▪ The site is not identified as a heritage item or heritage conservation area. Therefore, further assessment of European heritage would not be required.▪ As part of the EIS, an Aboriginal Heritage Assessment would be carried out and an Unexpected Finds Protocol developed.
Trees and biodiversity	<ul style="list-style-type: none">▪ The overall site of the College is identified as comprising 'biodiversity value' in the Biodiversity Values Map, but no biodiversity value is shown on the specific site of the Grey House Precinct.▪ The LEP mapping does however identify areas of biodiversity significance across the site, including within the Grey House Precinct.▪ A preliminary Arborist assessment has been undertaken to assess the trees on the site, and finds that the highest 'risk priority' for any tree is 'medium'; no trees are identified as 'high', 'urgent' or 'critical' priorities.▪ Therefore, it is considered unlikely that the site would contain any threatened species, ecological communities or habitats, that would be significantly affected by the proposal. Notwithstanding, it is acknowledged that preliminary ecological assessment would be required as part of the SSD.▪ Subject to the findings of a Preliminary Ecological Assessment, it is requested that the requirement for a BDAR is waived.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

Table 2. Environmental Risk Assessment	
Issue	Analysis
Bushfire	<ul style="list-style-type: none"> The site comprises designated bushfire prone land, but Council's mapping shows that the Grey House Precinct is not bushfire prone land and is considerably distanced from that portion of the site designated as such. Further consideration to bushfire is therefore not considered necessary to support the SSD.
Contamination	<ul style="list-style-type: none"> The site has been used as an Educational Establishment since 1916, and therefore is anticipated to be historically free of contamination. Notwithstanding, it is acknowledged that a Preliminary Site Investigation would be required to support the SSD.
Soil and water	<ul style="list-style-type: none"> A Stormwater Strategy for the site and detailed Stormwater Plans for the new buildings, would be provided with the EIS. Bulk earthworks would be designed to minimise the extent of cut and fill and allow the balance of soil to be re-used on-site. During construction, an Erosion and Sediment Control Plan would be implemented to protect the downstream drainage system and receiving waters from sediment-laden runoff.
Traffic and parking	<ul style="list-style-type: none"> The proposal would provide facilities to support the <i>existing</i> student population of the College and would not provide for an increase in student or staff numbers for Kindergarten to Year 12. As such, this component of the proposed development would not generate additional traffic or parking demand. The proposed ELC would however accommodate a new pre-Kindergarten stream, with capacity for 90 children. The traffic generation and additional car parking requirements for the ELC, would be addressed within a Traffic Report as part of the EIS. The intention would be for the ELC, Dance Academy and OSHC holiday care program, to be available for use by the broader community. The associated traffic generation and car parking requirements, would be addressed within a Traffic Report as part of the EIS.
Noise	<ul style="list-style-type: none"> Although the site is situated in close proximity to neighbouring residential receivers, it is noted that the use of the site for the College has been ongoing since 1916 and that noise has been appropriately managed. The acoustic impacts associated with the proposed Grey House Precinct development and associated traffic generation, would be assessed as part of the future EIS having regard for relevant noise criteria.
Air quality	<ul style="list-style-type: none"> Given the nature of the proposed development for a school, it is not anticipated that there would be any unacceptable air quality impacts. During construction, air quality would be managed through appropriate dust mitigation measures.
Ecologically sustainable design	<ul style="list-style-type: none"> The development would be designed in accordance with the principles of Ecologically Sustainable Development (ESD), incorporating active and passive design elements to reduce energy and water consumption and reduce the emission of greenhouse gases.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

Table 2. Environmental Risk Assessment

Issue	Analysis
Waste	<ul style="list-style-type: none">Waste generated during construction would be managed through a Construction Management Plan that makes provision for waste minimisation, storage, separation, transportation and off-site disposal.Operational waste would be managed in accordance with the existing waste management processes of the College.
Other infrastructure and services	<ul style="list-style-type: none">A servicing strategy would be formulated as part of the EIS.All necessary measures would be incorporated in the design to ensure the protection of the existing infrastructure and services.
Building Code of Australia (BCA)	<ul style="list-style-type: none">A BCA Report would be submitted as part of the EIS to confirm that the proposal would be capable of complying with the relevant provisions of the BCA.
Accessibility	<ul style="list-style-type: none">An Access Statement would be prepared by a qualified Accessibility Consultant to ensure the proposed development would be capable of providing universal access to all areas in accordance with the relevant Australian Standards.

SCOPING REPORT

Built Form Approval for Grey House Precinct, Pymble Ladies College
20 Avon Road, Pymble (Lot 1 DP 69541)

PART G CONCLUSION

The proposed redevelopment of the Grey House Precinct within the grounds of Pymble Ladies College would have a CIV exceeding \$20 million, and therefore would constitute SSD.

The proposal would be designed to provide modern teaching and learning facilities to support the ongoing evolution of the College in accordance with the needs of students, staff and the broader community.

It requested that DPIE issue formal SEARs for the preparation of an EIS to support the proposed development of the Grey House Precinct at Pymble Ladies College.

It is noted that whilst there is a broader vision for the progressive renewal and expansion of the College to respond to needs as they evolve, this proposal has been designed as a standalone project. Separate applications would be subsequently submitted as needs emerge.