

818 Pacific Highway, Gordon NSW 2072

Locked Bag 1006 Gordon NSW 2072

T 02 9424 0000 F 02 9424 0001

DX 8703 Gordon TTY 133 677

E krg@krg.nsw.gov.au

W www.krg.nsw.gov.au

ABN 86 408 856 411



Contact: Bonnie Yue

Ref: SSD-79146716

27 January 2026

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

Via: NSW Major Projects portal

Attention: Dimitri Gotsis

Dear Sir,

RE: Advice on the “Response to Submissions” to Secondary Innovation Precinct (SSD-79146716)

Thank you for the opportunity to comment on the Response to Submissions (RtS) for State Significant Development (SSD-79146716) for Pymble Ladies Collage – Secondary Innovation Precinct at 20 Avon Road, Pymble.

Following a review of the revised documentation, Council maintains its **objection** to the proposed development. Council’s submission is contained in **Attachment 1**.

Council has thoroughly reviewed the information provided in response to the submissions. In summary, Council considers that the RtS has not resolved the urban design concerns, and insufficient information regarding traffic and acoustic impact.

Should you have any further enquiries, please contact me on 02 9424 0941.

Yours sincerely,

Selwyn Segall
Team Leader Development Assessment
Ku-ring-gai Council

1. **Urban Design**

The western front corner of the proposed SIP building is setback 40 metres from the north-western boundary (Avon Road frontage), which is consistent with the setback of the north-eastern front corner of the existing Science Building (refer to Figure 1). The Science Building adjacent to the proposed SIP building is highly visible from Avon Road (refer to Figure 2). While trees within the proposed 'Lower Riparian Zone' are to be retained, the visual impact of the proposed development should not rely on vegetation for screening. As such, concerns remain regarding the lack of articulation or modulation to reduce its visual bulk on the northern façade of the six-storey building, which fronts Avon Road and adjacent R2-zoned low density residential dwellings along Avon Road.

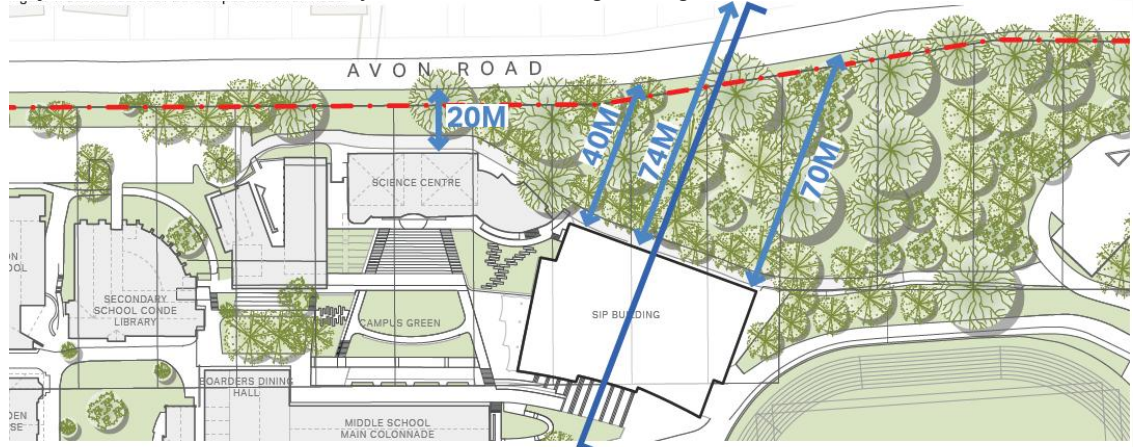


Figure 2: Location Plan featuring distances to Avon Road

Figure 1: Extract from RTS Appendix C – Architectural RTS response



Figure 2: The north-eastern corner of PLC Science Centre when viewed from Avon Road.

2. Landscape

a) SEARS – 7. Trees and Landscaping

Appendix R and Appendix I

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:

- 1) Submitted landscape plan (Appendix I) has been amended and provides enough details of proposed planting and proposed trees to be removed.
- 2) The Arborist Report (Appendix R) has been amended and now includes detailed recommendations for tree-sensitive construction methods for the trees proposed to be retained. The proposal must ensure that a project arborist undertakes inspections at all relevant stages of construction and is present on site during any works carried out within the Notional root zone of trees to be retained, in particular Trees T123, T142, T169, T175, and T180.

b) Appendix EE – ESD Report & 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:

- The amended landscape proposal indicated the number of native and indigenous species included in the indicative plant schedule.
- The installation of a sub-soil irrigation system has been indicated in the amended landscape plans.

c) Tree removal and impacts

Part 13 Tree and Vegetation Preservation KDCP

- i. Arborist report (Appendix R) has addressed Council concerns related to the trees proposed to be retention.
- ii. All *Ligustrum sinesnis*, are now shown for removal.
- iii. Several significant indigenous trees are still proposed for removal to allocate the proposed structures. 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 retain with a redesign of the proposal: T61, T71, T85, T102, T128, and T129.

d) Landscape Proposal has been improved and is acceptable.

The landscape plan has amended to include enough deep soil for each proposed tree, soil depths is aligned with NSW Planning Guidelines.

The landscape plans have improved the graphics, resulting more feasible for assessment.

The landscape plan has been amended to provide adequate deep soil areas for each proposed tree, with soil depths consistent with the NSW Planning Guidelines. The landscape plans have also been improved in terms of graphic clarity, making them more legible and suitable for assessment.

3. Ecology

a) Streamlined Biodiversity Development Assessment Report (SBDAR)

Section 6 has been included in the SBDAR to address this issue.

In reference to the proposed development location it states *“It 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.”* However, the consideration of alternative options does not consider alternative potential locations elsewhere on the campus.

It is noted that *“This footprint represents the minimum area required to consolidate educational functions that are currently dispersed across multiple outdated facilities, thereby optimising land use efficiency while preserving the environmental and visual values of the campus.”* However, the report does not outline why any one of these multiple locations can't be utilised for the facility.

Four options to avoid high-retention value trees (T61, T71, and T85), while maintaining functional, environmental, and operational requirements are listed.

It is noted that if the proposal is modified to protect these trees then a number of other BGHF species will also be protected, and it will minimise edge effects on the main BGHF corridor along the western side boundary.

Although these options do not have any distances associated with the considered shifts, it appears that they are all localised adjustments to the plan and there is no consideration of alternative options elsewhere on the campus.

Study 1 – Shift Northeast is noted to also result in loss of additional mature trees (T4, T10, T23 and others), in addition to disruption of the ring road however no details are provided as to if design could address that issue.

Study 2 – Shift South is noted to conflict with the heritage-listed Colonnade Building and Flagpole Lawn, whilst also intruding into the tree protection zones of T61 and T71. The need for increased excavation to retain access to the existing loading dock is also noted as a constraint, however it is not noted that the additional excavation is not possible.

Study 3 – Shift Southeast is noted as affecting the main oval and ring road. It would also require deeper excavation due to slope constraints and cause additional conflicts with existing drainage and service alignments. Again, it does not note these issues cannot be addressed.

Study 4 – Locate on Existing Demolition Footprints, redeveloping entirely within the existing demolition footprints would prevent delivery of the planned Campus Commons green space, which is intended as a central gathering area and biodiversity feature. It would also result in an over-height building due to existing site levels. Again, it does not note these issues cannot be addressed.

Considering that BGHF is a critically endangered ecological community, the information does not clearly articulate why the impact to these highest retention canopy remnants cannot be avoided. The development is not critical or essential infrastructure, could potentially be accommodated elsewhere on the campus with some additional planning, or the development could be adjusted and shifted within the immediate location in order to retain BGHF, it would just need additional works (excavation, service re-location, or merit assessment on deviation from standards such as height).

Section 8.4.1 notes *“Hydrological and soil profiles within the retained area will remain unaltered, ensuring that the proposal does not compound existing pressures on the TEC beyond the campus boundary.”* However, the report does not support that with reference to a supporting study or discuss potential hydrological impacts on the existing BGHF on the campus. It also ignores the fact that developments like this are the active “edge effects” that

contribute to the cumulative impacts that will continue to reduce the extent and connectivity of BGHF within the area.

Further information has been provided, however it is not sure whether it has fully demonstrates and inability to avoid impacts to BGHF. The statement do not appear to be supported by relevant reports, such as hydrology analysis specifically for the BGHF on the Campus.

b) Revised Vegetation Management Plan

Appendix A includes planting species, rates and numbers for management zones 1 and 2.

It appears that some of the requirements have not been fully addressed, such as it's only a 5 years monitoring program. The NSW Office of Water guidelines require *"Maintenance requirements should extend for a minimum of 2 years after the completion of works or until such time as a minimum 80% survival rate of each species planted and a maximum 5% weed cover for the treated riparian corridor-controlled activity is achieved."* While 5 years is good as it's more than the minimum, however it may not have enough time to get the areas down to 5% weed cover. In addition, the fact that it is a CEEC corridor, it should be implemented in perpetuity to prevent future chipping away at the edges within the campus.

4. Engineering

Council's Senior Development Engineer reviewed the amended Water Management Plan. It is noted that the hydraulic calculation has been submitted. The rainwater tank is used for irrigation and a drainage design at basement level is proposed. The calculation for the pump out system has not been submitted as it is no longer required.

5. Traffic

Council's Strategic Traffic Engineer reviewed the RTS document and the updated Traffic Impact Assessment (TIA). The RTS and TIA have addressed the traffic/ transport related comments from Council's submission.

It noted in the RTS that a submission was made by NSW Department of Planning, Housing and Infrastructure, which amongst other things, raised concerns for the ability for construction worker parking to be accommodated on-site. The proponent has responded by stating that the Preliminary Construction Traffic Management Plan (Appendix K) identifies that based on a [peak] construction workforce of 115 people and 40% of these driving, that demand for construction staff parking spaces is anticipated to be 46 spaces, and that up to 50 spaces can be made available on site. The 40% mode share for driving to site was based on the Rozelle Interchange Project, but it is considered that this was driven by existing constrained on-street parking surrounding the site rather than by choice.

While the Preliminary Construction Traffic Management Plan states construction staff will be strongly advised against using on-street parking and encouraged to use public transport or carpool etc, construction staff usually arrive on site earlier than surrounding commuters or students/staff and would therefore not face competition with those other users to park on-street. Therefore, it is recommended that the Preliminary Construction Traffic Management Plan be further amended to include a requirement that the developer/builder actively monitor the travel mode and car-pooling arrangements of construction staff such that on-street parking by construction staff is effectively avoided.

6. Noise and Land Contamination

a) Noise

The updated Acoustic Assessment Report prepared by Pulse White Noise Acoustics dated 8 October 2025 provides clarification regarding the proposed approach to the design, location and enclosure of rooftop mechanical plant, and confirms that detailed

mechanical plant specifications and acoustic verification will be undertaken at the Construction Certificate stage.

The report also clarifies that the 5-metre-high architectural louvre enclosures are not proposed as specific acoustic mitigation measures, and that the previously referenced 300mm acoustic louvre is no longer proposed.

It is acknowledged that, consistent with other development applications, the detailed selection of mechanical plant equipment and associated acoustic modelling is appropriately undertaken at the Construction Certificate stage. In this regard, the updated Acoustic Assessment adequately clarifies the intent and assumptions relied upon at the Development Application stage.

The revised information confirms that the proposed consolidated rooftop plant arrangement, combined with enclosure within a mechanical plantroom and the potential for additional acoustic treatments if required, is expected to be capable of achieving compliance with the relevant operational noise criteria, subject to detailed assessment at Construction Certificate stage.

On this basis, the matters raised in the original submission are considered to be satisfactorily addressed for the purposes of the Development Application, with detailed acoustic assessment and verification of compliance to be undertaken as part of the Construction Certificate process.

b) Land Contamination

The Detailed Site Investigation (DSI) has been reviewed and provides an assessment of site conditions and potential contamination risks associated with the proposed development. The DSI identifies the site as having a history of uses that may have resulted in contamination and outlines investigation findings and conclusions regarding site suitability.

The DSI makes reference to the potential preparation of a Remedial Action Plan (RAP) to be submitted following the granting of development consent, should remediation be required.

Notwithstanding this, it is noted that it is not considered appropriate or supported practice to defer the preparation and endorsement of a RAP until after consent is granted where remediation is required to make the site suitable for the proposed use. At the Development Application stage, sufficient information must be provided to demonstrate that the land is, or can be made, suitable for the proposed development in accordance with relevant planning and contamination management requirements.

While it is acknowledged that detailed remediation validation and implementation may occur at later stages, the need for remediation, the proposed remediation strategy, and confirmation that the site can be made suitable for the intended use should be clearly established at the Development Application stage.

On this basis, to satisfactorily address contamination considerations for the purposes of the Development Application, it is expected that either:

- the DSI demonstrates that the site is suitable for the proposed use without the need for remediation; or
- where remediation is required, a Remedial Action Plan is submitted with the application, or the DSI is updated to clearly define the nature and extent of remediation required and confirm that the proposed remediation strategy will render the site suitable for the intended use.

In the absence of this information, deferral of a RAP until post-consent is not supported.

END OF SUBMISSION