



5 March 2026

Traki Gotsis
Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Traki,

Response to Request for Information – Pymble Ladies College Secondary Innovation Precinct (SSD-79146716)

This letter has been prepared by Urbis on behalf of Pymble Ladies' College (**the Applicant**) in response to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) request for information dated 11 February 2026. This RFI requested that the Applicant respond to the submissions received from Ku-ring-gai Council (**Council**) (dated 27 January 2025) and Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation (**DCCEEW CPHR**) (dated 9 February 2026 and 27 February 2026) on the Response to Submissions package submitted by the Applicant in January 2026. The matters raised, and responses to each, are provided in **Appendix A**.

This cover letter should be read in conjunction with the following amended / additional documentation:

- Appendix A – Response to Agency and Council submissions
- Appendix B – Architectural RFI Response prepared by 3XN
- Appendix C – Updated Vegetation Management Plan prepared by Narla Environmental
- Appendix D – Hydrological and Soil Profile Response prepared by Narla Environmental

Kind regards,

A handwritten signature in dark ink, appearing to read "Rosie Sutcliffe".

Rosie Sutcliffe
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Appendix A – Response to Agency and Council Submissions

Summary of Issue Raised	Response	Supporting Documentation
<i>Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation</i>		
Advice dated 9 February 2026		
<u>Biodiversity</u> CPHR remains unable to access the BDAR case in Biodiversity Offsets and Agreement Management System (BOAMS) for review.	Narla Environment, the ecological consultant for the proposal, has updated the BDAR case. CPHR has been provided access to the case for review.	N/A
<u>Flood Risk Assessment</u> CPHR notes that the amended Flood Report prepared by Arup submitted with the RtS package has addressed their previous comments. They note that no further input by CPHR on flood risk management is required.	No action required.	N/A
Advice dated 27 February 2026		
<u>Biodiversity</u>	No action required from applicant. The College would be accepting of such conditions.	N/A

CPHR considers that all previously raised matters have been adequately addressed. The remaining matter is to ensure that all outcomes and mitigation measures are incorporated into the consent conditions, including the following:

- Retirement of the biodiversity credits specified in the BDAR.
- Implementation of all mitigation measures outlined in the BDAR.
- Implementation of the tree protection measures and arborist certification requirements specified in the AIA.

Ku-ring-gai Council

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. The Science Building adjacent to the proposed SIP building is highly visible from Avon Road.

The image provided at Figure 2 of Council's submission is not comparable to the setback and conditions proposed for the SIP building. Whilst the easternmost portion of the existing Science Building on the site is setback approximately 40m from the Avon Road frontage, (similar to the proposed SIP) this portion of the Science Building is similarly not visible from Avon Road, as it is heavily screened by existing trees, as demonstrated on page 3 of the Design Response prepared by 3XN at **Appendix B**.

The portion of the Science Building reproduced in the Council submission is also not screened by the dense trees forming part of the Lower Riparian Zone management area, unlike the proposed SIP building.

The majority of the SIP building will be setback greater than 40m from Avon Road and will be screened by dense, mature tree coverage, resulting in the development

Appendix B

	being minimally visible from Avon Road. Visual impacts are further minimised by the significant separation distances to the nearest residential dwellings across Avon Road (approximately 70m-100m separation), as well as the oblique viewing angles of the SIP building from the public domain. Given this context, the building will not present with the same level of prominence as the existing Science Building.	
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.	The visual impact of the proposed development should be assessed based on the full streetscape context, including the existing, mature vegetation on the site. This vegetation is not proposed as mitigation for the purposes of visual impact but rather forms an important part of the established and permanent landscape setting of the site. It provides extensive screening which will result in the SIP building being minimally visible from Avon Road. This is demonstrated clearly by the visualizations prepared by 3XN which were submitted at Appendix C of the Response to Submissions package. Moreover, the northern façade of the proposed building is broken into three distinct vertical components with glazed strips providing visual separation, and continuous horizontal sunshades provided to all levels. The northern façade will also include detailed brickwork to create further visual interest. Refer to Appendix B for further detailed assessment.	Appendix B
<u>Landscape</u> Trees and Landscaping (SEARs) Council have confirmed that their previous comments relating to landscape design, tree	Noted. A condition of consent can be imposed to ensure that a project arborist undertakes inspections and is present during relevant construction works.	N/A

retention and arboricultural impact with regards to the SEARs have been responded to and resolved.

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.

Ecologically Sustainable Development

No action required.

N/A

Council have confirmed that their previous comments relating to ecologically sustainable development have been responded to and resolved, and that no further amendments are required.

Tree Removal and Impacts

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 retained with a redesign of the proposal: T61, T71, T85, T102, T128, and T129.

Different design and location options have been tested for the SIP building, but the current proposal represents the most desirable outcome which balances and minimises tree loss, bulk and scale, environmental and amenity impacts and unnecessary disruption to the existing design and operation of the College.

Refer below in this table and to **Appendix B** for further detailed assessment.

Appendix B

Landscape Plans

No action required.

N/A

Council have confirmed that the landscape plans have been appropriately amended to respond to their previous comments, including in relation to soil depths and graphic clarity.

Ecology

Council considers that the amendments that have been made to the BDAR and the additional design work conducted to demonstrate four alternate locations/shifts of the SIP building and the issues associated with these locations are insufficient to clearly articulate why the impact to high retention value trees (T61, T71 and T85) cannot be avoided.

Specifically, Council states that the consideration of alternative options does not consider alternative potential locations elsewhere on campus and that insufficient detail is provided to prove that alternative locations cannot accommodate the development, as per the below:

- 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

An Architectural RFI Response has been prepared by 3XN (**Appendix B**) to demonstrate how alternative design scenarios have been explored to facilitate the retention of the identified trees (T61, T71, T85, T102, T128 and T129). These scenarios are detailed below.

Scenario 1: Increase Building Height

One option to retain the identified trees would be to reduce the building footprint but increase the proposed building height (to make up for the loss of approximately 38% of the proposed building's GFA). This would increase the visibility of the proposed development to surrounding residential properties as it would result in the building extending above the existing canopy level of the Blue Gum High Forest, thereby resulting in a significant visual impact. Due to comments articulated elsewhere in Council's submission, we anticipate that the resulting visual impact would not be supported by Council. Moreover, a taller building form would compromise the massing strategy of the development which has been carefully designed to respond to the surrounding residential and campus context. This option would also result in the loss of the proposed green roof and external planted terraces.

Scenario 1 would result in substantial visual, environmental, and contextual impacts and is considered less appropriate than the current proposal.

Scenario 2: Split the Program Across Multiple New Buildings

The project team has also explored the potential of reducing the size of the proposed SIP building to avoid impacts on high retention value trees and split the

Appendix B

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.

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

removed floorspace across multiple new buildings across the campus, rather than increasing the building height.

Splitting the function of the SIP across multiple buildings would reintroduce fragmentation of operational and learning spaces within the campus (something that the delivery of the project is seeking to address). The purpose of the SIP is to consolidate three outdated buildings into a single cohesive building. Reverting to multiple new buildings would reduce operational efficiency, compromise functionality, and diminish the quality and cohesion of learning environments, which is not an acceptable outcome for the College.

Additionally, the only feasible location for an additional building beyond the proposed location of the SIP is within the proposed Campus Commons area. Constructing a new building in this area would significantly reduce the potential size of the Campus Commons, resulting in reduced landscaping and biodiversity benefits. A building in this area would also reducing solar access to existing buildings within the campus, including the Ferguson Building, Colonnade Building and Science Building, and compromise the intended cohesion achieved through the proposed Campus Commons design.

Accordingly, Scenario 2 involving the construction of multiple new buildings would result in poor operational, amenity and environmental outcomes for the school. This option is not considered by the design team to reflect a suitable, desirable or efficient design outcome and subsequently has been rejected in favour of the current proposal which will see all floorspace consolidated into one building and complimented by the delivery of a large, high-quality open space with extensive planting providing amenity and biodiversity value to the campus.

Scenario 3: Shift the Building within a Localised Area on the Site

to retain BGHF, it would just need additional works (excavation, service re-location, or merit assessment on deviation from standards such as height).

The previous RtS response outlined a series of four alternative siting studies which considered shifting the proposed SIP building to the northeast, south, southeast or west. Significant constraints were identified with all four directional moves, and it was concluded that the current proposal represents the most suitable outcome. Council's submission asserts that there was inadequate justification provided to demonstrate that these constraints could not be resolved through additional excavation, redesign, or service relocation.

Whether these alternate locations are technically feasible and the myriad issues and constraints associated with them could be resolved is irrelevant, as compared to current proposal, all four directional shifts would result in increased environmental impacts and disruption to the operations of the College. The excavation, redesign or service relocation required to make any of these shifts feasible would result in additional and intensified impacts on the site.

As outlined in the Architectural RFI Response prepared by 3XN (**Appendix B**), each directional shift of the proposed building footprint scenario will result in one or more of the following:

- Increased removal of mature trees elsewhere on the campus.
 - Greater excavation and construction disturbance due to site topography to maintain loading access and floor levels.
 - Disruption to the Gate 1 ring road necessitating redesign and displacement of traffic onto surrounding local streets.
 - Increased building height and visual bulk impacting neighbours.
 - Loss or substantial reduction of the proposed Campus Commons green space.
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- Additional conflicts with existing Campus buildings, servicing, and emergency access.

Overall, the proposed relocation scenarios would result in greater construction complexity, site disturbance and tree loss. Whilst it may be possible to redesign the development to address these impacts, this does not negate the fact that the overall impact of these alternative locations would be more significant and disruptive than the currently proposed location and design. Relocating the building will not eliminate impacts, it will only redistribute and intensify them.

Considering this, the current proposal represents the best overall outcome with the least cumulative impact on community, biodiversity and landscaping. Whilst some tree removal is required, this will be effectively offset and fully mitigated through the comprehensive replanting and biodiversity strategy proposed, including substantial new canopy planting and Blue Gum Forest species.

Scenario 4: Displace the Building Elsewhere on the Site

The final scenario tested in response to Council's comments is the potential to accommodate the proposed SIP building elsewhere on the PLC campus. A detailed review of the existing campus infrastructure, open space and high value ecological communities (Blue Gum High Forest and Turpentine Ironbark Forest) was conducted to identify potential alternate sites, which is summarised below and provided in further detail at **Appendix B**.

Western Campus

The western portion of the campus accommodates the College sporting facilities including tennis courts, pools, sports fields and a gymnasium which are all fully utilised by students and are essential to the operation of the school. This portion of the campus is also surrounded by areas of highly sensitive Turpentine Ironbark

Forest. Construction of the SIP in this area would require the demolition of these sporting facilities, as well as potential encroachment on the Turpentine Ironbark Forest, causing irreversible ecological impact. There would be no suitable location elsewhere on the campus to relocate the sporting facilities without impacting on ecological values and existing buildings.

Additionally, the western campus is significantly distanced from the main vehicular access to the school. As vehicular access is required to the SIP building, if it were constructed in this location a new access would need to be provided, impacting on surrounding local roads, which would be an undesirable outcome.

Central Campus

The Central campus area is characterised by numerous existing buildings that are fundamental to the operation of the College, including the library, boarding halls and various classrooms. Demolition of these buildings to facilitate the construction of the SIP would not only compromise operations of the College during construction, but also introduce the need to construct additional buildings elsewhere on the campus to replace the functions of the demolished buildings, creating further disruption and impacts throughout the site.

North/South of Current Senior School Buildings

The current proposal seeks to demolish existing school buildings which have reached the end of their operational lifespan, replacing them with the Campus Commons open space and constructing the SIP building slightly to the east of this area. The function of these buildings to be demolished will be consolidated into one building, being the proposed SIP. Regardless of the location of the SIP, these buildings are required to be demolished as they are no longer fit for purpose.

Redevelopment in the same location as the demolished buildings would limit natural light, ventilation and amenity for surrounding facilities, as well as prevent the delivery of the Campus Commons open space. The sloping topography and existing levels in this area would also create visual separation between buildings and disrupt student flow.

Eastern Campus

Currently, the SIP building is proposed on the easternmost portion of the site that is suitable for development. Locating the proposed building any further east would result in encroachment onto existing campus open spaces, including the oval which is a crucial space for the ongoing operation of the school and cannot be compromised in any way by new development. Additionally, the eastern portion of the campus is characterised by large areas of Blue Gum High Forest which must not be disturbed due to the ecological value it possesses. Therefore, locating the proposed building further east would be unacceptable due to ecological sensitivity and loss of essential open space.

There is no other location that could accommodate the proposed SIP building without excessive operational and ecological impacts. Crucially, there are no other buildings or facilities within the campus which are suitable for demolition, other than those proposed to be demolished as part of this application, meaning no other location could accommodate a building the size of the proposed SIP. Refer to **Appendix B** for further detailed assessment on this matter.

Section 8.4.1 of the BDAR 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

Narla Environmental has prepared a response to Council's comments regarding the hydrological and soil profile impacts of the development, which is contained at **Appendix D**.

Appendix D

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.

This response confirms that any increased rainfall runoff associated with the development, which is expected to be modest, will be directed northward towards the existing drainage depression north of the development site, consistent with existing conditions. As such, any change in surface runoff characteristics occurs in a direction consistent with the predevelopment drainage pattern and therefore does not constitute a new or redirected hydrological pressure on the Blue Gum High Forest (BGHF). The proposed development includes an onsite stormwater detention (OSD) tank which will ensure the volume and velocity of stormwater reaching the drainage depression and the vicinity of the BGHF corridor will not exceed predevelopment levels, which will ensure that there will be no significant hydrological impacts on the BGHF. The proposed development is also distanced from nearby watercourses or the drainage depression and does not intersect with any riparian buffer areas, meaning that subsurface and surface hydrological processes within the riparian zone will not be disturbed.

Appendix D also considers any potential impacts on soil profiles of the BGHF due to the proposed development. The retained BGHF is located north of the development footprint (on the other side of the existing service road) and has an intact soil profile that has not been previously disturbed by buildings or hardstand.

Basement excavation is limited to the development footprint, with no works proposed within the BGHF or tree root zones, and Tree Protection Zones will be established to protect the retained vegetation. The SIP basement level is also well above the adjacent tributary bed, meaning that excavation will not affect subsurface water flows supporting the BGHF, lower the water table or impact soil moisture availability. Areas proposed for clearing are already highly modified, and their removal will not affect the separate, intact soils of the retained corridor, especially as the area of works is distanced from the BGHF by the existing service road. Construction controls will ensure storage, laydown and stockpiling do not

occur near the BGHF, preventing changes to soil condition or chemistry at the edge of the BGHF corridor during construction.

In relation to Council's comment regarding edge effects, Narla Environmental confirm that indirect impacts such as weed infiltration, altered moisture, nutrient loading and light spill may affect the BGHF edge as a result of the proposed works, as discussed in the BDAR. However, the proposed development will not introduce any new edge effects which do not already impact this area of BGHF and will not substantially change the existing conditions affecting the BGHF. Any edge effects associated with the development will be managed through the Vegetation Management Plan (VMP) including through measures such as hydrological buffering, erosion control, edge effect management, weed suppression, enrichment planting, and monitoring of edge stability.

The additional information provided substantiates the claim made in Section 8.4.1 of the BDAR that *"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"*. Refer to **Appendix D** for further detailed assessment on this matter.

Vegetation Management Plan

The Vegetation Management Plan proposes a 5-year monitoring plan which, whilst being consistent with NSW Office of Water guidelines, may not be long enough to achieve 5% weed cover. As the VMP applies to a CEEC corridor, it should be implemented in perpetuity to prevent future chipping away at the edges within the campus.

An amended VMP has been prepared by Narla Environmental and is contained at **Appendix C**. The VMP has been updated to require that management obligations extend in perpetuity to ensure the long-term protection of the Blue Gum High Forest. Specifically, the VMP has amended to include the following requirements in response to Council's comments:

- The VMP aims to reduce weed cover to a maximum of 5% across the treated riparian corridor within 5 years. If this is not achieved by Year 5, weed management is to continue until the 5% threshold is met.

Appendix C

	- Continued weed management and adaptive responses are required to maintain $\leq 5\%$ weed cover and protect the BGHF CEEC corridor in perpetuity. - Once the $\leq 5\%$ weed cover and $\geq 80\%$ plant survival thresholds are meant, monitoring and reporting is to continue every three years in perpetuity to maintain the ecological integrity of the Blue Gum High Forest CEEC corridor and prevent future encroachment.	
Engineering Council have confirmed that the matters raised in their original submission in relation to engineering and stormwater have been appropriately addressed, and no further action is required.	No action required.	N/A
Traffic 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-	The Preliminary Construction Traffic Management Plan will be updated and finalised by the appointed construction contractor. The College will ensure that measure to encourage public transport usage and car-pooling arrangements of construction staff re implemented within the finalised CMP.	N/A

street parking by construction staff is effectively avoided.

Noise and Land Contamination

No action required.

N/A

Noise

Council have confirmed that the matters raised in their original submission in relation to noise have been appropriately addressed and no further action is required at the development application stage.

Contamination

Council objects to the postponement of the potential preparation of a Remedial Action Plan to post-approval.

To satisfactorily address contamination considerations for the purposes of the Development Application, Council expects 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

The extent and nature (if any) of in ground contamination within the building footprint is unable to be confirmed until the existing buildings are demolished. As such, any Remediation Action Plan (RAP) prepared at this time would be generic and speculative. An appropriate condition of consent could be imposed requiring the Applicant to do further testing once building demolition is complete. The College would be accepting of such a condition.

N/A

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

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