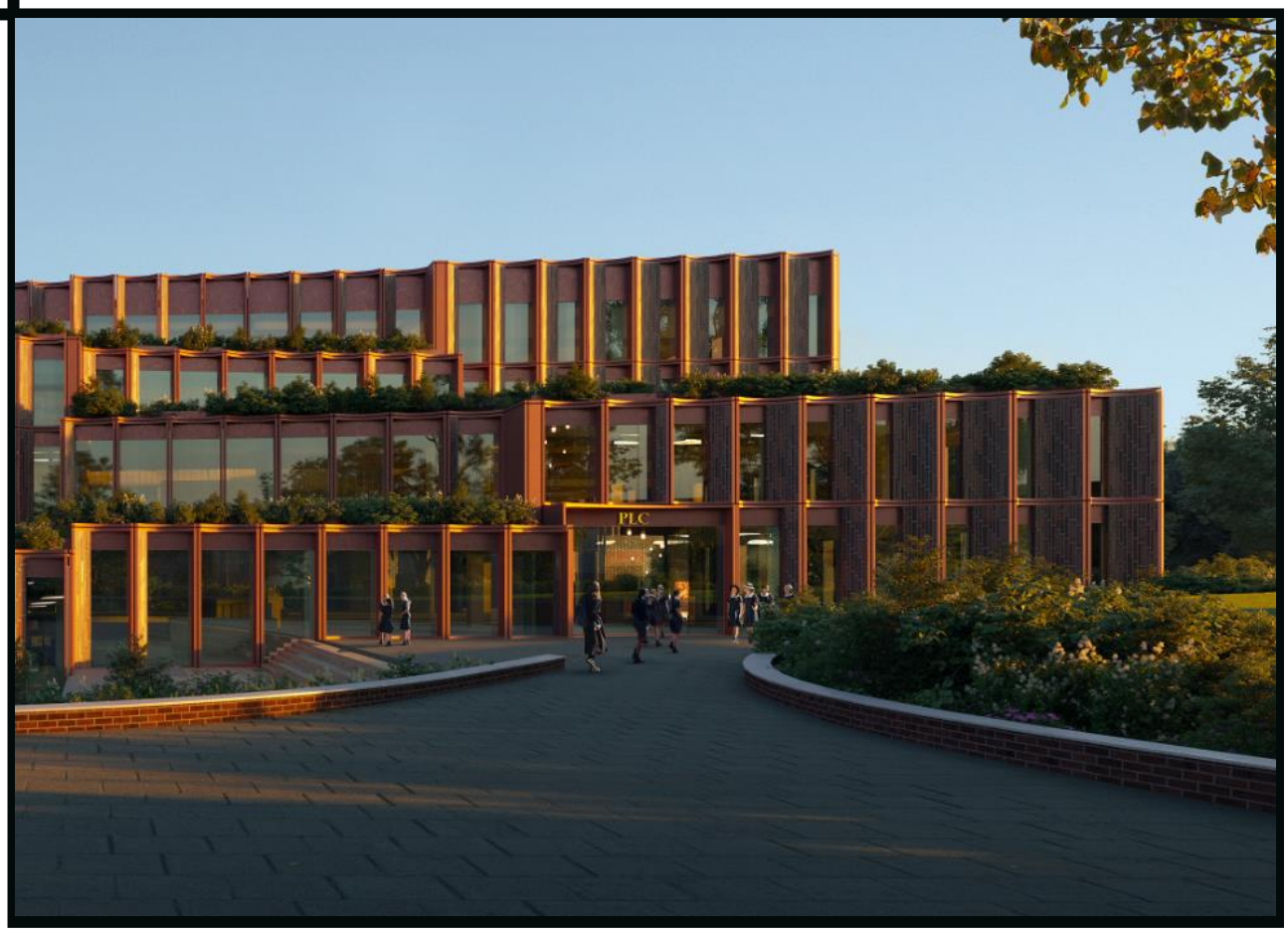


PRELIMINARY CONSTRUCTION TRAFFIC MANAGEMENT PLAN

Pymble Ladies' College
Secondary Innovation Precinct
and Campus Commons

Prepared for
PYMBLE LADIES' COLLEGE
30 May 2025

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Kasia Balsam
Associate Director	John Parnell
Senior Consultant	Sedrik Aralar
Project Code	P0057142
Report Number	05

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

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

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

urbis.com.au

CONTENTS

FIGURES

TABLES

1. INTRODUCTION

1.1. OVERVIEW

Urbis has been commissioned by Pymble Ladies' College (referred hereinafter as "the College" or "campus") to prepare this Construction Traffic Management Plan (CTMP) report in accordance with the technical requirements of the Secretary's Environmental Assessment Requirements (SEARs) and in support of the preparation of an Environmental Impact Statement (EIS) and State Significant Development Application (SSD- 79146716) to the Department of Planning, Housing and Infrastructure (DPHI).

This report has been prepared with reference to architectural plans prepared by 3XN and dated May 2025.

1.2. THE CAMPUS

Pymble Ladies' College is located at 20 Avon Road, Pymble, within the Ku-Ring-Gai Local Government Area (LGA). The site comprises multiple parcels of land and is legally described as:

- Lot 1 Deposited Plan 69541
- Lots 11 - 17 Deposited Plan 7131

This report is for the Secondary Innovation Precinct (SIP, hereinafter referred to as 'the development') and Campus Commons, including landscaping works. The location of the development within the site is identified in **Figure 1**.

Figure 1 Pymble Ladies' College

Source: Urbis

1.3. DEVELOPMENT

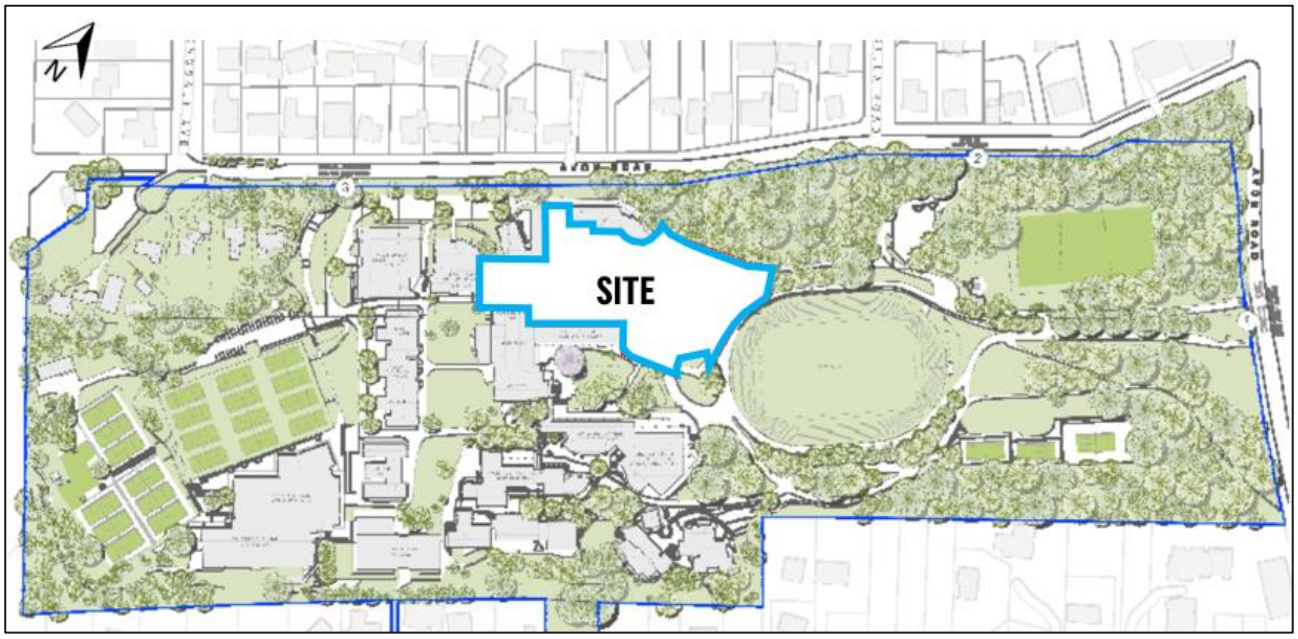
The proposal seeks development approval for the Secondary Innovation Precinct and Campus Commons at Pymble Ladies' College. The development comprises:

- Demolition of the existing Isabel Harrison, Dorothy Knox, John Vicars and Robert Vicars Buildings.
- Tree removal.
- Excavation of the basement level.
- Construction of the new five-storey SIP building of RL 146.98m and including:
  - General Learning Spaces.
  - STEM teaching spaces.
  - Senior student facilities.
  - Function spaces.
  - Food and beverage facilities.
  - Associated amenities.
  - Storage and building services.
- One loading dock within the basement (for service vehicles) accessible from the existing rear vehicle service road.
- Minor kerb realignment of the existing access road to the east of the SIP.
- Landscaping on the outdoor terraces and surrounding the building.

The project also includes the Campus Commons, a significant garden lawn and amphitheatre connecting the SIP precinct to the rest of the campus.

The development is located in the northwest area of the campus, to the west of the main oval and to the east of the science centre, as shown in **Figure 2Error! Reference source not found.**.

Figure 2 Secondary Innovation Precinct and Campus Commons



Source: 3XN, AR-SIP-DA-A00-1001 ISSUE 3, DATED 13/03/2025

Key features of the site are as follows:

- The site accommodates the existing Pymble Ladies' College which accommodates Kindergarten to Year 12 students.
- Vehicular access to the College is provided via separate ingress and egress driveways on the northern and western sections of Avon Road.
- Pedestrian access is provided through multiple gates along Avon Road.
- The project area that is subject to this SSDA is located at the entrance to the College west of the oval.
- The project area slopes down from south to north with a fall from RL 124.50 at the southern corner to RL 116 at the northwest corner.

Key features of the locality:

The development context surrounding the site is a leafy suburban environment, predominantly made up of detached residential properties set within expansive gardens and along avenues lined with mature trees.

Recent developments of moderate-scale residential apartment buildings occur closer to the railway corridor. Two-storey commercial establishments are located near Pymble train station, specifically along the Pacific Highway and on the northern flank of the railway line.

- The site is located approximately 19km northwest of the Sydney Central Business District.
- The College is situated approximately 200m from Pymble train station, situated on Pacific Highway and Pymble town centre.

The immediately surrounding locality is described as follows:

- North: Avon Road and Pacific Highway (approximately 400m).
- East: Residential uses, accommodating a mixture of dwelling houses and residential flat buildings.
- South: Avondale Golf Course.
- West: Avon Road, beyond which is a residential area characterised by detached dwelling houses.

1.4. THE PLANNING SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs for the proposed new building within the school is discussed in **Table 1**. This table also provides a reference for where each requirement is addressed in this report.

Table 1 Planning Secretary's Environmental Assessment Requirements

Project SEAR SSD 79146716	Report Reference
9. Traffic, Transport and Accessibility	
Provide a transport and accessibility impact assessment, which includes:	
▪ an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current daily and peak hour vehicle movements, and existing performance levels of nearby intersections.	Assessed in the Traffic Impact Assessment Report
▪ details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading	Assessed in the Traffic Impact Assessment Report

Project SEAR SSD 79146716	Report Reference
▪ analysis of the impacts of the proposed development during construction and operation (including justification for the methodology used), including predicted modal split, a forecast of additional daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), potential queuing in drop-off/pick-up zones and bus bays during peak periods, identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict), and any cumulative impact from surrounding approved developments	Assessed in the Traffic Impact Assessment Report Section 4 of this CTMP
▪ measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms (including proposed arrangements with local councils or government agencies) of delivery of any infrastructure improvements in accordance with relevant standards	Section 4
▪ measures to promote sustainable travel choices for employees, students and visitors, such as connections into existing walking and cycling networks, minimising car parking provision¸ encouraging car share and public transport, providing adequate bicycle parking and high quality end-of-trip facilities, and implementing a Green Travel Plan	Assessed in the Green Travel Plan
▪ a preliminary operational traffic and access management plan for the development, including drop-off/pick-up zones, bus bays and their operations	Assessed in the Operational Traffic and Access Management Plan
Provide a Construction Traffic Management Plan detailing predicted construction vehicle routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated	This Report

Source: SSD-79146716 Planning SEARs

1.5. PURPOSE OF THIS REPORT

The report sets out a transport assessment aimed at addressing the transport implications associated with the construction works for the proposed building. It includes an assessment of:

- The suitability of the surrounding transport network.
- The suitability of proposed access arrangements and intersections for the construction vehicles.
- The transport impacts of the construction vehicle traffic generation on the surrounding transport network.

2. EXISTING CONDITIONS

2.1. PUBLIC TRANSPORT

The closest existing railway connection is Pymble train station, located 180 metres to the east of the school's main pedestrian entrance. The station is serviced by the T1 North Shore & Western line, providing connections to Hornsby in the north and Central via Chatswood in the south.

Trains run frequently through Pymble train station with approximately one service every 5-10 minutes during the typical commuter peak periods and one service every 15 minutes outside of commuter peak periods.

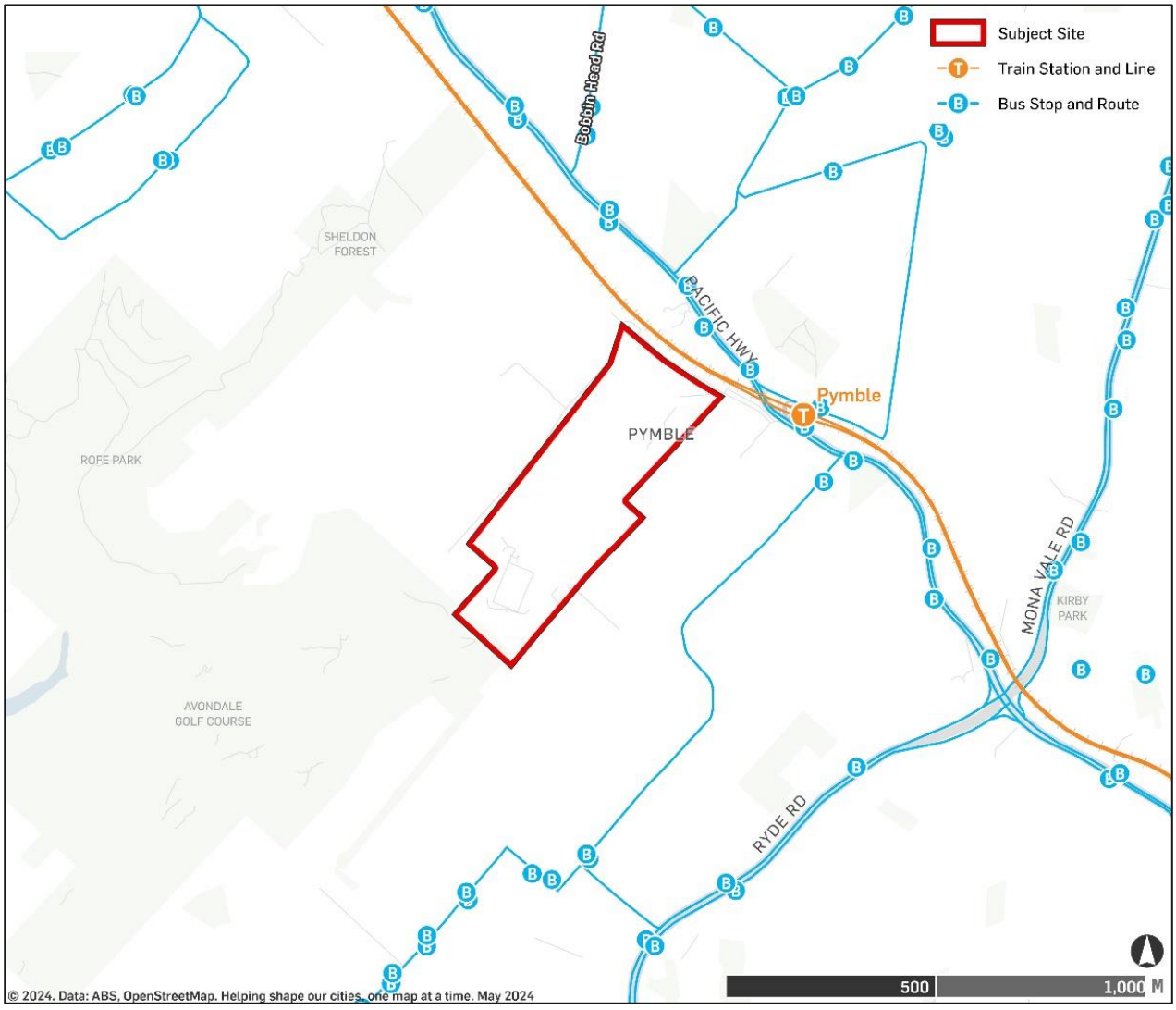
Pymble is also well-serviced by buses, with bus routes and bus stops located on Pacific Highway and Livingstone Avenue. The bus stops on Pacific Highway can be accessed directly via the walkway next to the Avon Road / Pymble Avenue / Everton Street roundabout. The closest bus services are the 575 and 579 which has bus stops along Pacific Highway.

Other services that operate in the vicinity of the school are:

- Service 575 – Hornsby to Macquarie University.
- Service 579 – Pymble to East Turramurra.
- Service 560 – Gordon to West Pymble (Loop Service).

Figure 3 shows the public transport routes within the vicinity of the school.

Figure 3 Bus and Train Connectivity to the school



Source: GTFS data, TfNSW Open Data Hub

2.2. PEDESTRIAN AND CYCLIST NETWORK

The existing pedestrian footpaths, pedestrian access points to school grounds and existing pedestrian crossings surrounding the school are shown in **Figure 4**.

The main pedestrian route to access the railway station is via the main pedestrian gate and wombat crossing managed by a school supervisor on Avon Road. There is an additional pedestrian crossing adjacent to the roundabout.

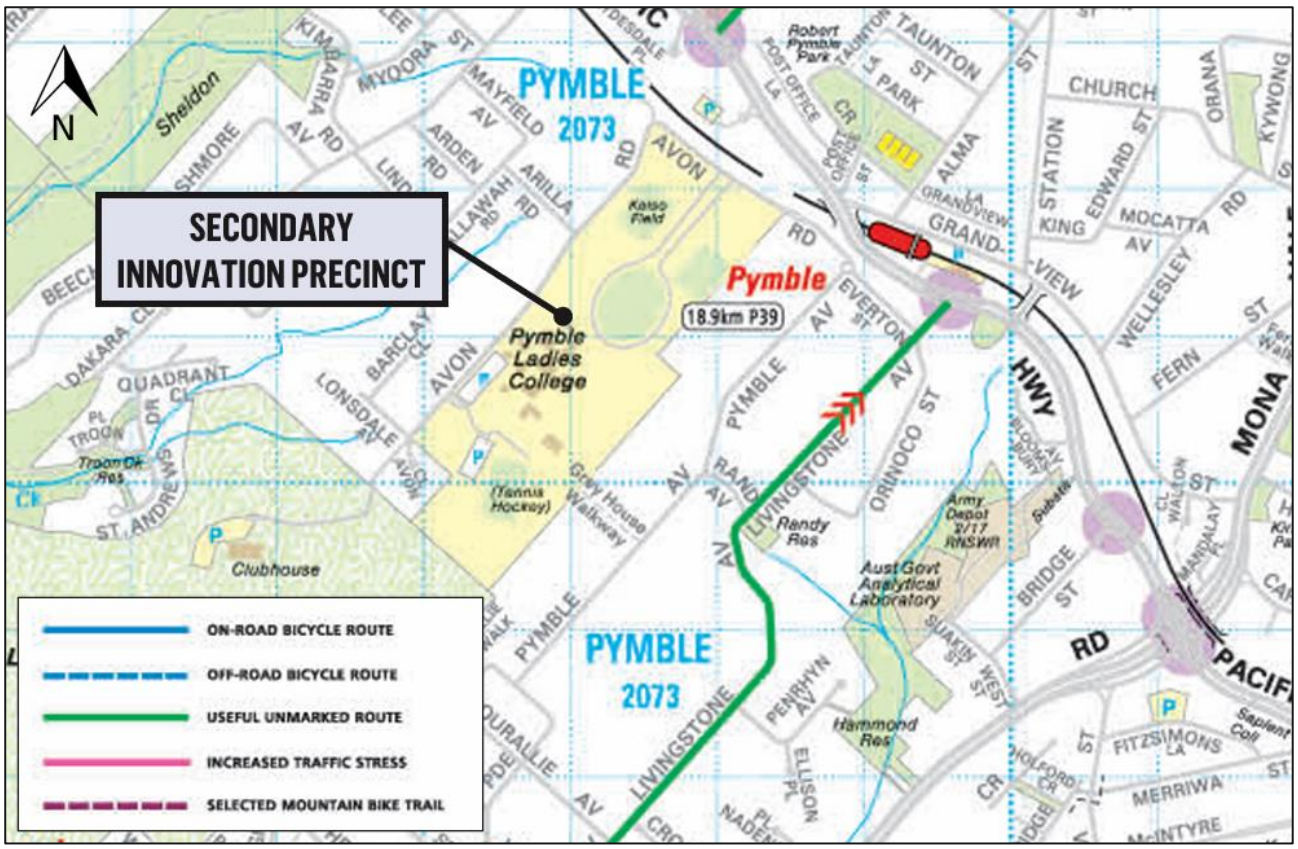
There is a wombat crossing across Pymble Avenue adjacent to the Grey House Walk access to facilitate safe pedestrian access to the school. The raised crossing currently has a traffic controller.

Figure 4 Surrounding Pedestrian Facilities

Source: Nearmap, formatted by Urbis

The existing cycling network is shown in **Figure 5**. It shows that a 'useful unmarked route' is located along Livingstone Avenue that can be used to reach the site from the south. It should be noted that local roads could be utilised for on-street cycling to reach the campus from multiple directions.

Figure 5 Surrounding Cycling Network



Source: Open Data Hub

2.3. TRAFFIC PERFORMANCE

A site inspection was undertaken around the site which showed that congestion is noted on Avon Road and Pymble Avenue during the following periods:

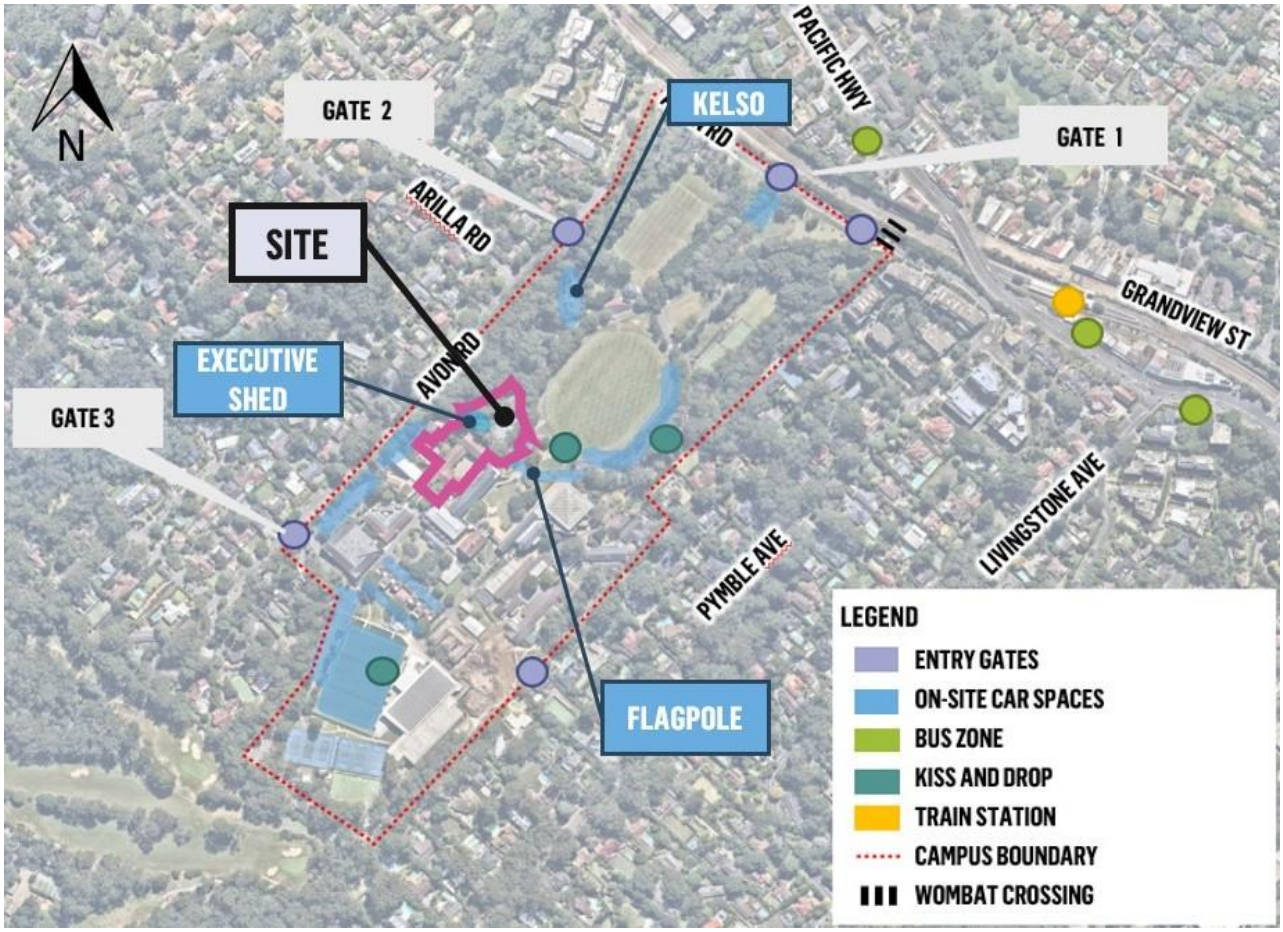
- AM Peak: 7:55 AM to 8:10 AM
- PM Peak: 3:10 PM to 3:25 PM

This is not unusual, given that the development is located within a school, whereby drop-off and pick-up activities result in increased traffic volumes.

2.4. CAR PARKING

The locations of existing parking areas within the campus are shown in blue in **Figure 6**. The total number of formal parking spaces within the campus is 431 (from Matrix 2024 parking survey).

Figure 6 Car Parking Locations



Source: Urbis

3. CONSTRUCTION ACTIVITIES

The project is in the SSDA stage where detailed information regarding construction activities is unknown. All information provided within this section is indicative and subject to change and will be confirmed during the succeeding stages of the application process.

3.1. CONSTRUCTION PROGRAMME

3.1.1. Project Duration and Staging

The project is anticipated to be broken down into two phases with durations shown below:

- Phase 1 – Demolition works – 3 months.
- Phase 2 – Building works and landscaping – 21 months.

3.1.2. Work Hours

The anticipated work hours for both demolition and construction works are shown below:

- Monday to Friday – 7 AM to 6 PM.
- Saturday and Sunday – no operation.

These hours are based on the conditions of consent for the recently constructed Grey House Precinct located within the campus. It should be noted that truck movements will be restricted to outside peak drop-off/pick-up periods.

3.2. CONSTRUCTION ACCESS AND PARKING

3.2.1. Construction Staff Parking

Some on-site parking for construction staff will be provided in the laydown area. Details of this on-site parking will be provided in the subsequent CTMP to be prepared post approval, once a builder is engaged.

3.2.2. Access and Construction laydown area

The existing Kelso Car Park near Gate 2 is proposed to be utilised as a material storage and laydown area during the construction works. The exact outlines of this area will be assessed with swept paths of the design vehicles during the preparation of the detailed CTMP.

Access to the material storage and laydown area is proposed to be via Gate 2 (as shown in **Figure 7**). All inbound and outbound construction-related traffic are anticipated to utilise this access.

Figure 7 Construction laydown area

Source: Nearmap, formatted by Urbis

3.2.3. Vehicle Types

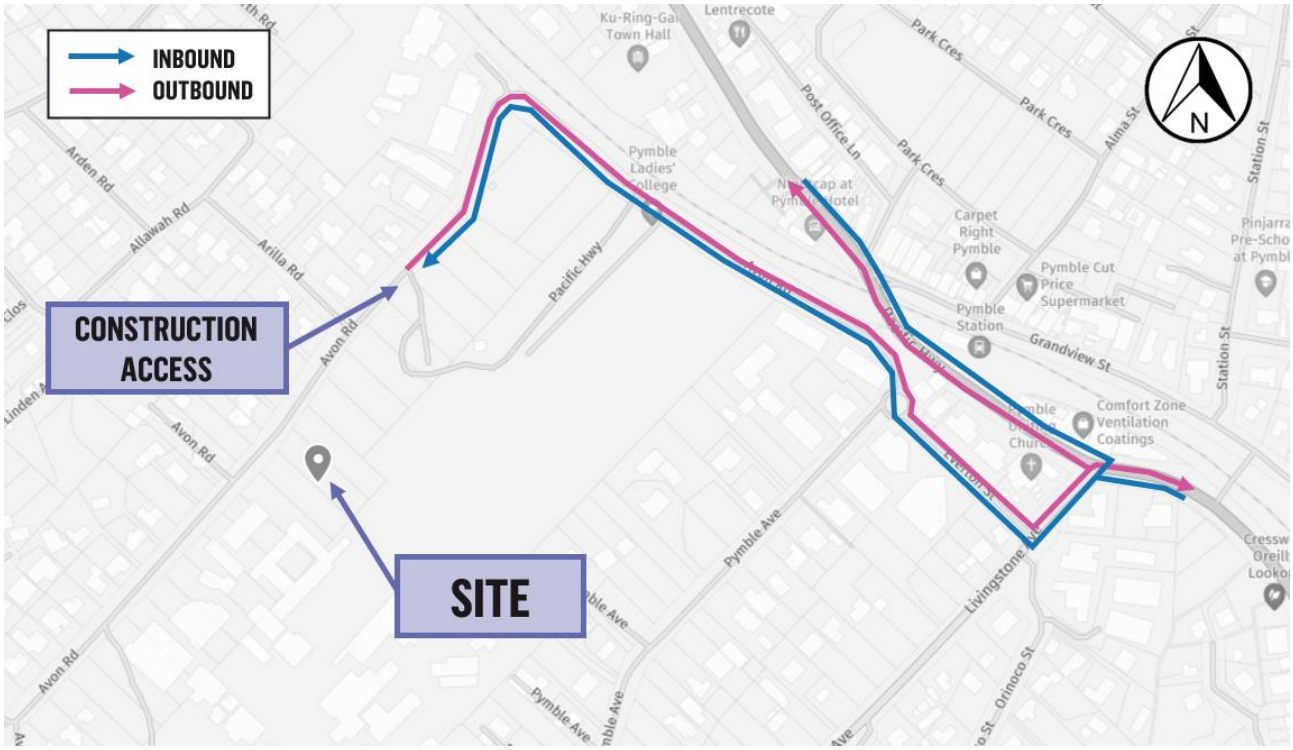
The College is considering the use of truck-and-dog for demolition and delivery of construction materials. However, this design vehicle is subject to change depending on the suitability of surrounding local roads and intersections to accommodate the swept paths. This will be assessed during the preparation of a detailed CTMP for the site.

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

3.2.4. Vehicle Routes

Figure 8 shows the anticipated truck routes going to and coming from the site. Inbound vehicles are anticipated to come from Pacific Highway and turn into Livingstone Avenue, then to Everton Street. The truck will then turn into Avon Road and finally turn at the bend to continue to Avon Road and ultimately to Gate 2. Outbound vehicles will utilise the above route in reverse.

Figure 8 Construction Vehicle Routes



Source: Nearmap, formatted by Urbis

3.3. CONSTRUCTION TRAFFIC GENERATION

The number of light and heavy vehicle traffic generated by the construction works of the SIP is currently under consideration and will be determined during more detailed stages of the approval process. Data presented below are approximate numbers based on the CTMP report for the Grey House Precinct (GHP) which are used as a baseline for the trip generation potential of the SIP.

3.3.1. Heavy Vehicle Traffic

The trip generation of the GHP based on the CTMP report for the project is detailed in **Table 2**.

Table 2 Heavy Vehicle Movements in the Grey House Precinct

Stage	Estimated Construction Vehicles (movements per day – in and out)
Demolition and enabling works	16-24 movements
Main Construction	Excavation: 32 movements Concrete pours: 30 movements Delivery/waste removal: 8-12 movements
External works and landscaping	Concrete pours: 10 movements Deliveries: 8 movements

Source: Pymble Ladies' College Grey House Precinct CTMP Report, Stantec, 2021

During peak construction works, up to 74 heavy vehicle movements could be generated per day.

3.3.2. Light Vehicle Traffic

The GHP CTMP estimated the number of light vehicle trips based on the number of construction staff and some assumptions regarding public transport utilisation and carpooling. The resulting estimates are presented in **Table 3**.

Table 3 Light Vehicle Movements in the Grey House Precinct

Stage	AM movements	PM movements
Demolition and enabling works	8	8
Main Construction	39	39
External works and landscaping	23	23

Source: Pymble Ladies' College Grey House Precinct CTMP Report, Stantec, 2021

During peak construction works (main construction), the GHP may generate up to 39 light vehicle movements for both the AM and PM periods.

3.3.3. Cumulative Traffic

As mentioned, the GHP is currently under construction. The main access to this building is via gate 3 to the southwest of the SIP. However, it is anticipated that the work will be completed before the work in the SIP begins. As such, no overlap of construction traffic between the two developments is anticipated.

At this stage, no other developments are observed within the vicinity of the site. The constructor of the SIP will coordinate with the Ku-ring-gai Council and other authorities to confirm the presence of other construction works that may coincide with the construction of the SIP. Based on the outcomes of the coordination, mitigation measures will be proposed during the preparation of the detailed CTMP for the project (if required).

4. CONSTRUCTION TRAFFIC MANAGEMENT

4.1. TRAFFIC GUIDANCE SCHEME

Traffic Guidance Schemes (TGSs) will be prepared for the detailed CTMP to ensure the safety of pedestrians and other drivers while travelling around or through the work site and minimise the risk during heavy vehicle or equipment manoeuvres. In addition, plans to manage any unusual truck movements at the proposed access (Gate 2) and all local intersections between the access and Pacific Highway shall be prepared.

4.2. IMPACTS ON PEDESTRIAN MOVEMENTS

It is expected that numerous pedestrian movements will occur in the surrounding area. The work site will be securely enclosed to prevent children from entering. Adequate protection will be installed at points where heavy vehicle paths intersect with pedestrian paths. Truck movements will also be restricted outside peak drop-off and pickup times to minimise the impacts on pedestrians.

The additional pedestrian traffic generated by the construction works (i.e., construction workers walking from/to the train station/bus stops) is not anticipated to significantly affect the amenity of the surrounding footpaths since the volume of workers is not excessive. In addition, the arrival/departure times of construction staff are not anticipated to overlap with school peak periods.

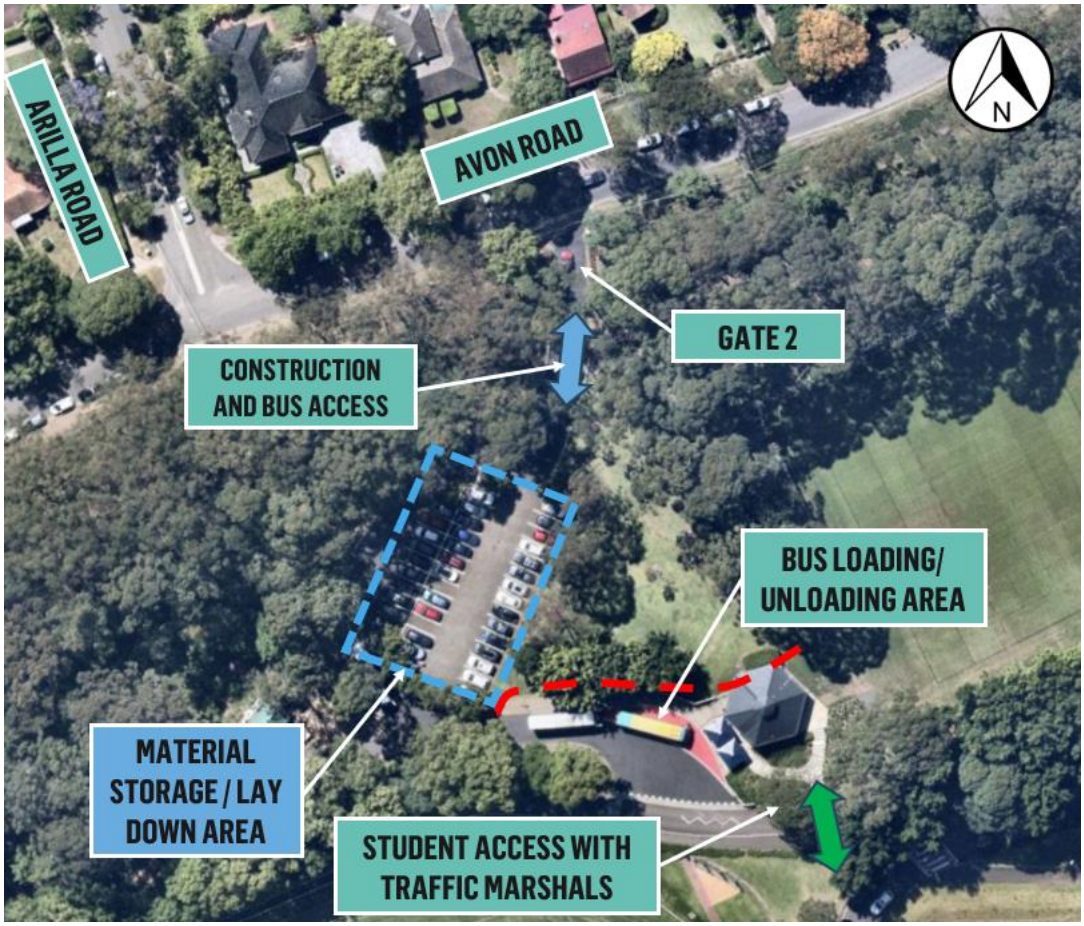
4.3. IMPACTS ON ACCESS AND BUS ARRANGEMENTS

The Kelso car park near Gate 2 will be closed to general traffic (i.e. staff), therefore, there will be separation between the school community and construction vehicle movements.

Gate 2 is currently being used as the entrance by school buses to reach the bus loading/unloading area illustrated in **Figure 9**. It is proposed to retain the existing bus loading/unloading area, with the addition of measures to ensure safe access for students. This will include:

- Clear delineation of construction zones and where the buses are permitted through the use of fencing and gates, to eliminate conflicts.
- Clear delineation of the bus loading/unloading area with movable fencing, along with instructions for areas of restricted access for students.
- College staff / traffic marshals to direct and safely guide students from the college to the bus loading/unloading area. Students shall only be allowed to enter the area via the Main Oval to the south.
- Restriction of construction access and deliveries during bus operation times.

Figure 9 Construction Site Access



Source: Nearmap, formatted by Urbis

4.4. IMPACTS ON CAR PARKING

4.4.1. School Staff/Visitors/Students Car Parking

The proposed construction laydown area will result in the temporary removal of 40 spaces at the Kelso car park, and a further four spaces are proposed to be permanently removed in the flagpole area (refer to the TIA for further description) as shown in **Figure 10**. Out of the 40 spaces removed temporarily, 25 will be relocated to the 'Under the Pines' area and 5 to the 'Back Court' area as shown in **Figure 10**, resulting in a net temporary loss of 10 spaces. It should be noted that after the construction is completed, the 40-space car park will be reopened, and the temporary 30 spaces in the 'Under the Pines' and 'Back Court' areas will be closed. The development will lose a net of four parking spaces after the completion of the construction works. These changes are shown in **Table 2**

Table 4 Permanent and Temporary Parking Space Changes

Car Park Use	Removed Spaces		Remarks	Net Change
	Current Location	Count		
Board Member Parking	Executive Shed (also called 'IH')	-6	Relocated to Flagpole Area (reciprocal with existing staff/visitor parking)	0
Visitor Parking	Flagpole	-4	removed to make way for the modified kerb	-4 (permanent removal)
Staff Parking	Kelso Car Park	-40	25 spaces relocated to 'Under the Pines' and 5 spaces relocated to 'Back Court'	-10 (temporary removal)
			Total	-14

Figure 10 Changes to Car Parking Supply

Source: Pymble Ladies College, formatted by Urbis

4.4.2. Construction Staff Car Parking

Construction staff will be informed of the limited number of parking spaces during induction and encouraged to utilise public transport, carpool, and walk/cycle to work if practical. Construction staff will be actively discouraged from parking in the surrounding on-street bays to retain the availability of the spaces for residents/school staff. Additionally, equipment/tool storage areas will be provided to eliminate the need to drive a vehicle to work. As discussed in Section 3.2.1, some car parking spaces will be provided for construction staff within the on-site laydown area.

It is crucial to encourage alternative modes of transport for both construction staff and school staff to minimise the impact of the increased parking demand during construction. The Green Travel Plan (GTP) prepared for the SIP outlines recommendations to improve the site's use of active and public modes of transportation. These recommendations could be implemented during construction to mitigate the potential impact of construction activities on the parking supply in the surrounding area. An excerpt of the recommendations in the GTP is provided below:

- Produce a Transport Access Guide (TAG) to inform students, staff and parents/guardians of their travel options to the school.
- Ensure the TAG provides information about priority and safe pedestrian access routes to the school and the location of marshals. Promote walking to school through the TAG and the school newsletter.
- Ensure the TAG provides information on carpooling initiatives and parking management options.
- Participate in activities that promote active travel, such as National Ride2School Day and Walk to School Day in March and May.
- Provide bike safety and maintenance workshops and road safety education for students and parents to encourage cycling even without extensive infrastructure. This could involve industry experts and council members.
- Implement green travel challenges and tournaments that encourage green travel uptake. This can include a pedometer walking challenge among students, among staff, or students vs. teachers (per capita) that runs for the length of the school term.

While the above recommendations are focused on the staff and students, the same information will be supplied to construction staff to improve their use of public and active modes of transport. More information on the recommendations is presented in the GTP prepared for the SIP.

4.5. IMPACTS ON PUBLIC TRANSPORTATION

No bus stops are located along Avon Road and Pymble Avenue which are the main access roads that will be used by construction traffic. Therefore, the proposed construction works are not anticipated to have any impact on the surrounding public transportation.

It should be noted that public transport usage is anticipated to increase due to the additional demand created by construction staff. This increased demand is considered negligible considering that public transport modes are designed to accommodate a significant number of users.

4.6. IMPACTS ON THE SURROUNDING ROAD NETWORK

As discussed in Section 2.3, the site's surrounding area is experiencing congestion during peak periods. Based on the construction staff's work hours, workers are anticipated to arrive around 7 AM and depart around 6 PM, outside the identified network peak periods. Therefore, while the proposed development will generate additional traffic, the trips will not overlap with the current peak periods and therefore are not expected to have a direct impact on the surrounding network.

Additional trips made by heavy vehicles are anticipated to be distributed throughout the working day. Arrangements will be made such that deliveries and other activities will be outside the identified network and school peaks to minimise the impact on the surrounding road network.

4.7. COMMUNICATION AND IMPLEMENTATION STRATEGY

4.7.1. Site Inspections and Record-Keeping

The construction work will be monitored to ensure it follows the CTMP provided by the appointed contractor. A daily inspection will occur before construction activities begin to confirm that conditions align with the plan and that there are no potential hazards. Any possible adverse impacts will be documented and addressed if they arise.

4.7.2. Site Induction

All construction staff shall undergo a site induction where all requirements for working within the site will be provided, which could include the following, in addition to general instructions:

- Limited availability of off-street and on-street car parking.
- Public transportation options.
- Availability of pedestrian and cycling facilities.
- Permitted heavy vehicle access routes.

4.7.3. Consultation

Consultation with key stakeholders shall be undertaken on a regular basis to ensure that all stakeholders affected by the construction works are considered. The consultation process could include the following:

- Letter drop to local residents who may be affected by the construction works.
- Direct consultation with the Ku-ring-gai Council, Transport for NSW, Fire and Rescue NSW, and NSW Police, and Ambulance NSW.

5. CONCLUSIONS

This construction traffic management plan outlines the following conclusions regarding the proposed Secondary Innovation Precinct:

- The proposed SIP will be constructed over approximately 24 months, including 3 months of demolition and 21 months of construction/landscaping works. Construction works are anticipated to be from Monday to Friday, 7 AM to 6 PM. Truck movements are planned to be outside peak drop-off/pick-up periods.
- Based on construction trip generation at the Grey House Precinct, the construction works could generate up to 74 heavy vehicle movements throughout the day, and up to 39 light vehicle movements during AM and PM peak construction staff arrival times during the main construction period.
- The removal of existing car parking spaces and provision of temporary parking spaces within the site will result in a temporary net loss of 10 parking spaces.
- Construction workers will be actively discouraged from traveling by car. This will be supported by encouraging the use of active and public transport and carpooling. More initiatives are discussed in the Green Travel Plan.
- The construction of the proposed development is not anticipated to have a significant traffic impact on the surrounding network on the basis that mitigation measures are implemented to address the potential increase in car parking demand by construction staff.

6. DISCLAIMER

This report is dated 30 May 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Pymble Ladies' College **(Instructing Party)** for the purpose of Secondary Innovation Precinct Construction Traffic Management Plan **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

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

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

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

Appen
URBIS