

Department of Planning, Housing and Infrastructure

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Pymble Ladies College Secondary Innovation Precinct

State Significant Development Assessment Report (SSD-79146716)

June 2026





Acknowledgement of Country

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Pymble Ladies College Secondary Innovation Precinct (SSD-79146716)
Assessment Report

Published: June 2026

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Preface

This assessment report provides a record of the Department of Planning, Housing and Infrastructure's (the Department) assessment and evaluation of the State significant development (SSD) application for the Pymble Ladies College Secondary Innovation Precinct located at 20 Avon Road, Pymble, lodged by Pymble Ladies College. The report includes:

- an explanation of why the project is considered SSD and who the consent authority is
- an assessment of the project against government policy and statutory requirements, including mandatory considerations
- a demonstration of how matters raised by the community and other stakeholders have been considered
- an explanation of any changes made to the project during the assessment process
- an assessment of the likely environmental, social and economic impacts of the project
- an evaluation which weighs up the likely impacts and benefits of the project, having regard to the proposed mitigations, offsets, community views and expert advice; and provides a view on whether the impacts are on balance, acceptable
- an opinion on whether the project is approvable or not, along with the reasons, to assist the Independent Planning Commission in making an informed decision about whether development consent for the project can be granted and any conditions that should be imposed.

Executive Summary

This report details the Department's assessment of the State significant development application SSD-79146716 for the Pymble Ladies College Secondary Innovation Precinct located at 20 Avon Road, Pymble in the Ku-ring-gai local government area (LGA).

This report will be provided to the Independent Planning Commission (IPC) for their consideration when deciding whether to grant consent to the SSD.

Pymble Ladies College (the Applicant) proposes to demolish 4 school buildings and construct a 6-storey building in the centre northwest portion of the Pymble Ladies College (PLC) site (campus). The project includes tree removal, landscaping, parking, open space, and school amenities. The project would be used by the secondary school and called the Secondary Innovation Precinct (SIP). No student or staff increase is proposed.

The project has an Estimated Development Cost (EDC) of \$99,674,252 and is predicted to generate up to 115 construction jobs.

The project is classified as SSD under section 4.36 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it satisfies the criteria under section 15(1)(a) of Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) being works to an existing school with an EDC over \$50 million. The application is permissible with consent.

The Department exhibited the Environmental Impact Statement (EIS) from 8 July 2025 until to 6 August 2025 (28 days). The Department received advice from government agencies and a total of 5 submissions, including an objection from Council, 2 objections from the community, and 2 comments from utility providers. Key issues raised included concerns regarding built form and urban design, and loss of trees and biodiversity.

The Independent Planning Commission (IPC) is the consent authority for the project under section 4.5(a) of the EP&A Act because it satisfies criteria under section 2.7 of the Planning Systems SEPP as Ku-ring-gai Council (Council) objected to the project during public exhibition of the EIS.

The Applicant submitted a Response to Submissions (RtS) on 5 January 2026 and additional information on 20 February 2026 providing further justification for the development and addressing issues raised in submissions and agency advice.

The Department made the RtS publicly available on the NSW Planning Portal and consulted Council and agencies. The Department received advice from government agencies and a submission from Council identifying issues and maintaining its objection.

Key issues raised during exhibition and after lodgement of the RtS related to:

- built form and urban design
- biodiversity
- traffic and parking.

The Department has considered the merits of the amended proposal in accordance with relevant matters under section 4.15(1) of the EP&A Act, the issues raised in the submissions received during exhibition, the Applicant's responses to submissions and additional information. The Department concludes that the amended proposal is acceptable as:

- it is consistent with the *State Infrastructure Strategy 2022–2042* and Ku-ring-gai Local Strategic Planning Statement
- it would facilitate State government priorities by providing social infrastructure to support the current and future needs of the growing population in this region, including provision of additional school facilities
- it would provide approximately 92 to 115 construction jobs
- the design responds appropriately to its context, with a staggered, terraced southern elevation reducing perceived bulk and scale, materiality complementing adjacent school buildings, and the building being effectively screened from Avon Road and adjoining residential dwellings by the retained Blue Gum High Forest to the north
- residual impacts on Blue Gum High Forest (a Critically Endangered Ecological Community) have been minimised through siting the development primarily within the footprint of existing buildings and exotic vegetation, and impacts would be appropriately offset through indigenous replacement planting, and securing of 3 ecosystem credits through the Biodiversity Offsets Scheme
- the development is permissible with consent on land zoned SP2 Infrastructure under the Ku-ring-gai Local Environmental Plan 2015, is consistent with the objectives of that zone, and would deliver new learning facilities without any increase in student or staff numbers with no additional demand on traffic or parking in the surrounding area
- the proposal incorporates a range of ESD initiatives, including a 5 Green Star design target, on-site renewable energy generation, water-sensitive urban design measures, a green roof, and extensive landscaping that mitigate urban heat island effects.

The Department has recommended conditions to address any residual issues.

Following its detailed assessment, the Department considers the project is not contrary to the public interest and concludes that the project is suitable for approval, subject to conditions.

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1 Introduction

1.1 The proposal

1. Pymble Ladies College (the Applicant) proposes to demolish 4 school buildings and construct a new 6-storey secondary school building within the Pymble Ladies College site (school site) to be known as the Secondary Innovation Precinct (SIP).
2. The project description and mitigation measures are provided in Section 3 and Appendix C of the environmental impact statement (EIS) and have been refined by the Response to Submissions (RtS), are the subject of this report and will form part of the development consent if the project is approved. An overview of the proposed development is provided in Section 2.

1.2 Site description

1.2.1 Pymble Ladies College (PLC)

3. Pymble Ladies College (PLC) is an independent girls' school (Kindergarten (K) to Year 12), with boarding available from Year 7. PLC is located 19 kilometres (km) north-west of Sydney Central Business District (CBD), 8km from the Chatswood CBD and within 200 metres (m) of Pymble train station. The regional context of the site is identified in **Figure 1**.

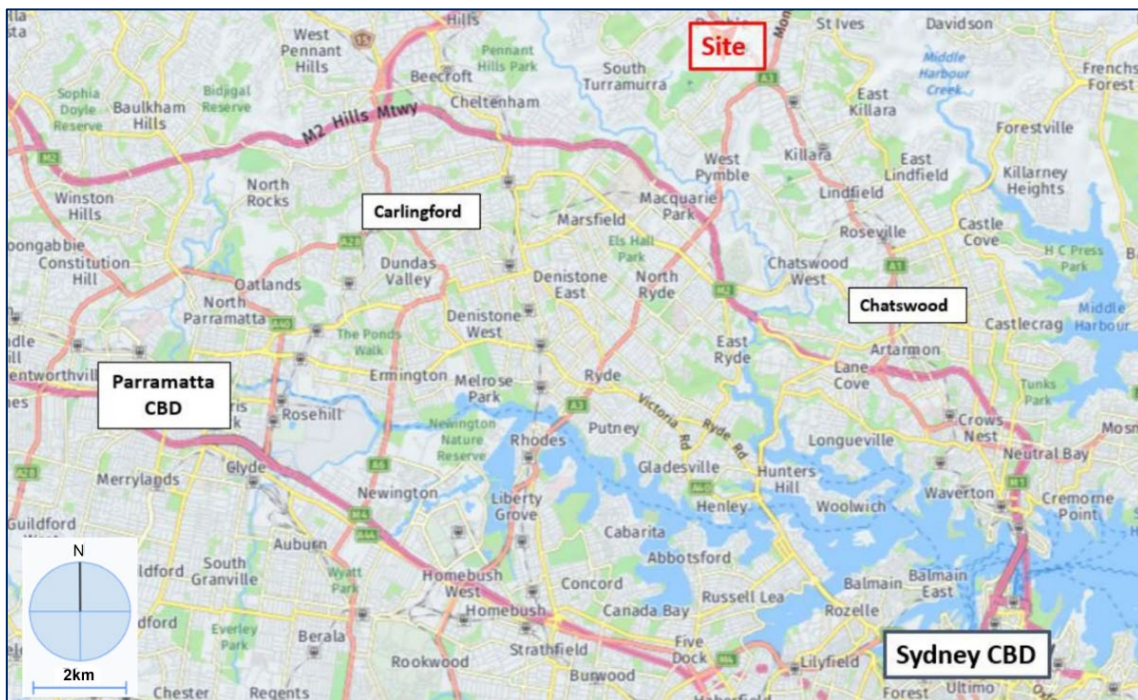


Figure 1 | Regional context map (Base source: Nearmap 2025)

4. The PLC campus is located at 20 Avon Road, Pymble and comprises multiple lots under ownership of the Applicant. The development site is within the northwestern portion of the campus and comprises Lots 11-17 DP 7131 and Lot 1 DP 69541.
5. The PLC campus occupies a total area of approximately 20 hectares (ha) and has street frontage to Avon Road to the northeast and northwest.
6. The southeastern boundary of the campus directly adjoins rear open space of dwelling houses and residential flat buildings along Pymble Avenue, and the southwestern boundary adjoins the Avondale golf course. The northwestern boundary of the school campus runs along Avon Road with opposing residential dwelling houses fronting Avon Road.
7. The topography of the PLC campus falls from north to south, with a cross fall from east to west and a natural gully line running along the site's north-western boundary.
8. The North Shore Railway line is located north of Avon Road, beyond which is the Pacific Highway. Pymble Station is located approximately 200m from the school boundary.
9. The project site (referred to as 'the development site' in this report) is the area shown in **Figure 2**. This is the where the extent of physical works would occur, including demolition, tree removal, excavation, construction of the SIP building and Campus Commons, and landscaping. Temporary construction worker parking would be located outside of the development site in the existing Kelso car park shown in **Figure 3**. The development site is located along the central northwestern boundary of the campus, across the road and opposite to detached residential dwelling houses that front Avon Road.
10. **Figure 2** provides the local context of the PLC campus and the location of the development site within the campus.



Figure 2 | Local context and location of the development site (Base source: Applicant EIS 2025)

1.2.2 Existing development and features of the PLC campus

11. The PLC campus comprises multiple school buildings, sports facilities, car parking, vegetation and landscaped garden areas. While the site is not identified as a heritage item under the Ku-ring-gai Local Environmental Plan (KLEP) 2015, it includes school buildings that have qualities of heritage significance, including Marsden House, Lang House, the 2 storey Goodlet House building and War Memorial Building located to the north, west and centre. The single storey Junior School building and Music and Art School are in the northeast of the campus and the contemporary multistorey Aquatic and Fitness Centre is in the south-west of the campus.
12. The Grey House Precinct is located along the southeast boundary of the school campus and consists of a 5-storey building accommodating classrooms, laboratories, health and wellbeing facilities, a dance academy, out-of-school-hours care facilities and an early learning centre. The Grey House Precinct is fully constructed and is due to commence operation in mid-2026.
13. A large oval is located adjacent to the development site, in the central northeast part of the campus, and multiple tennis courts (Mollie Dive Field tennis courts) are in the southwest part of the campus.

14. A basement car park (Centenary Car Park) is located underneath the Mollie Dive Field tennis courts. Staff and visitor parking is located along internal roads accessed from Gate 1 on Avon Road and a staff carpark area is located off Gate 2 adjacent to the northwest boundary of the site, accessed from Avon Road.
15. The PLC campus contains areas of densely vegetated bushland along its northeast and southwest boundary, consisting of native and locally indigenous plant and tree species, including areas of Blue Gum High Forest (BGHF) and Sydney Turpentine-Ironbark Forest (STIF), which are threatened ecological communities.
16. A riparian corridor runs from the north to the southwest near the northern border of the site. Stormwater is piped from the site to drainage pits along the northern border, which flow into the stormwater mains along Avon Road.
17. Existing buildings and features of the PLC campus and the location of the development site in the context of the campus are identified in **Figure 3**.

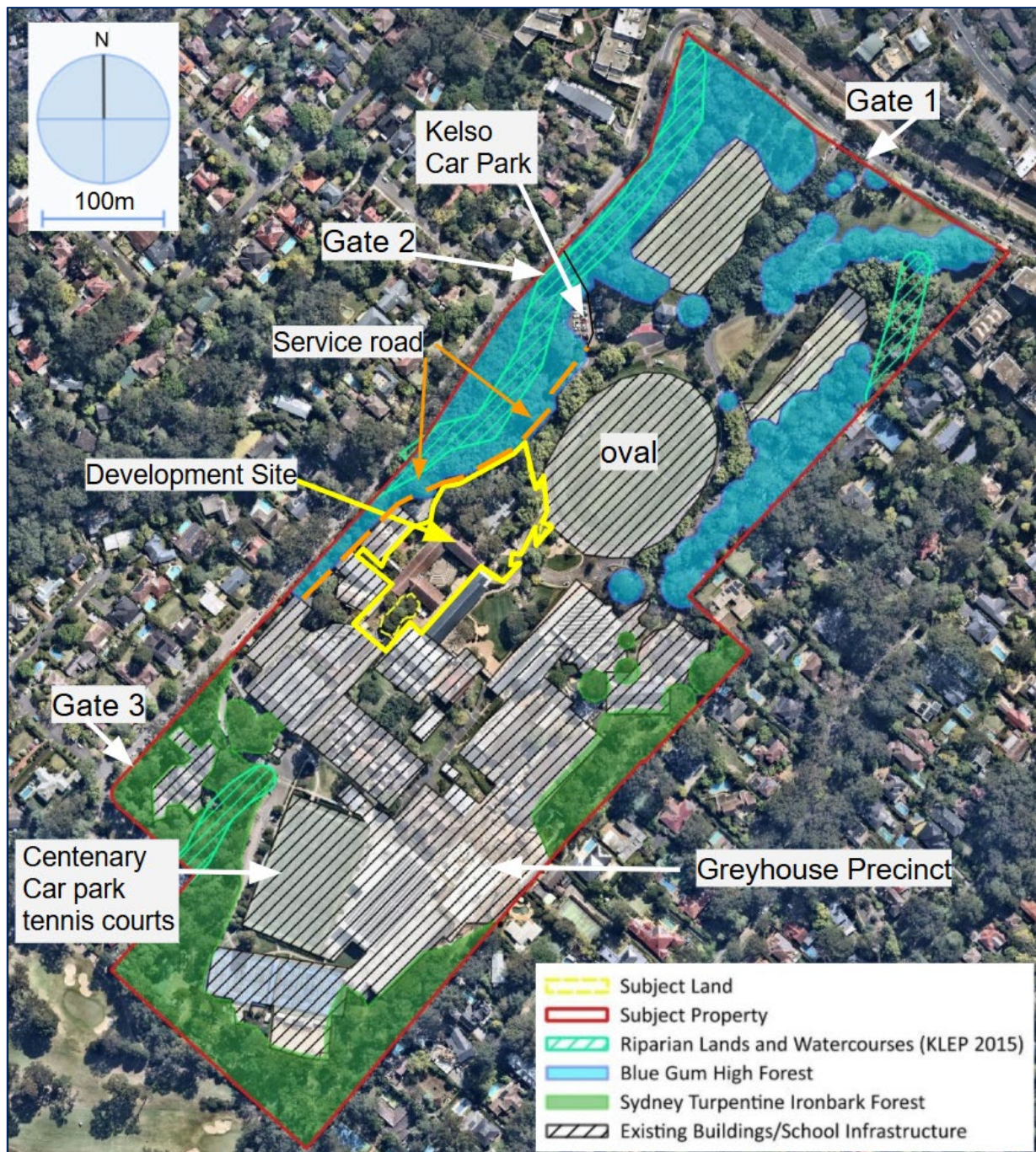


Figure 3 | Existing features of the campus and SIP context (Base source: Applicant EIS 2025)

18. The PLC campus accommodates a population of 2550 students (including boarders) and 488 staff. The operating hours of the PLC campus, including co-curricular activities, are between 6:30am – 6:30pm (weekdays) and 7am – 12pm on Saturdays.

1.2.3 Existing access, drop-off/pick-up and car parking

19. The PLC campus has 3 main access points off Avon Road for general vehicles, buses, service vehicles and emergency vehicles. The entry gates are shown in purple in **Figure 4**.

20. Gate 1 (Marden Gates) is the primary vehicular and pedestrian access point to the PLC campus, providing access into the central portion of the site and a drop-off/pick-up (DOPU) area. Gate 2 provides access to the 'Kelso' carpark and an additional pedestrian access point for school users. Gate 3 provides access to the 'Centenary' basement carpark located below tennis courts, and to a DOPU area.
21. The PLC campus provides a total of 431 formal on-site parking spaces throughout the campus for staff and visitors, with unmarked and informal car parking spaces/areas also available. Students are not permitted to park within the campus.
22. The 'back court' carpark is an unmarked car parking area currently used for construction worker parking for the Grey House Precinct development.
23. The PLC campus contains 2 formal DOPU areas, accessed by Gates 1 and 3. No formal DOPU is provided external to the campus.
24. **Figure 4** provides context to existing access points, DOPU areas and car parking.

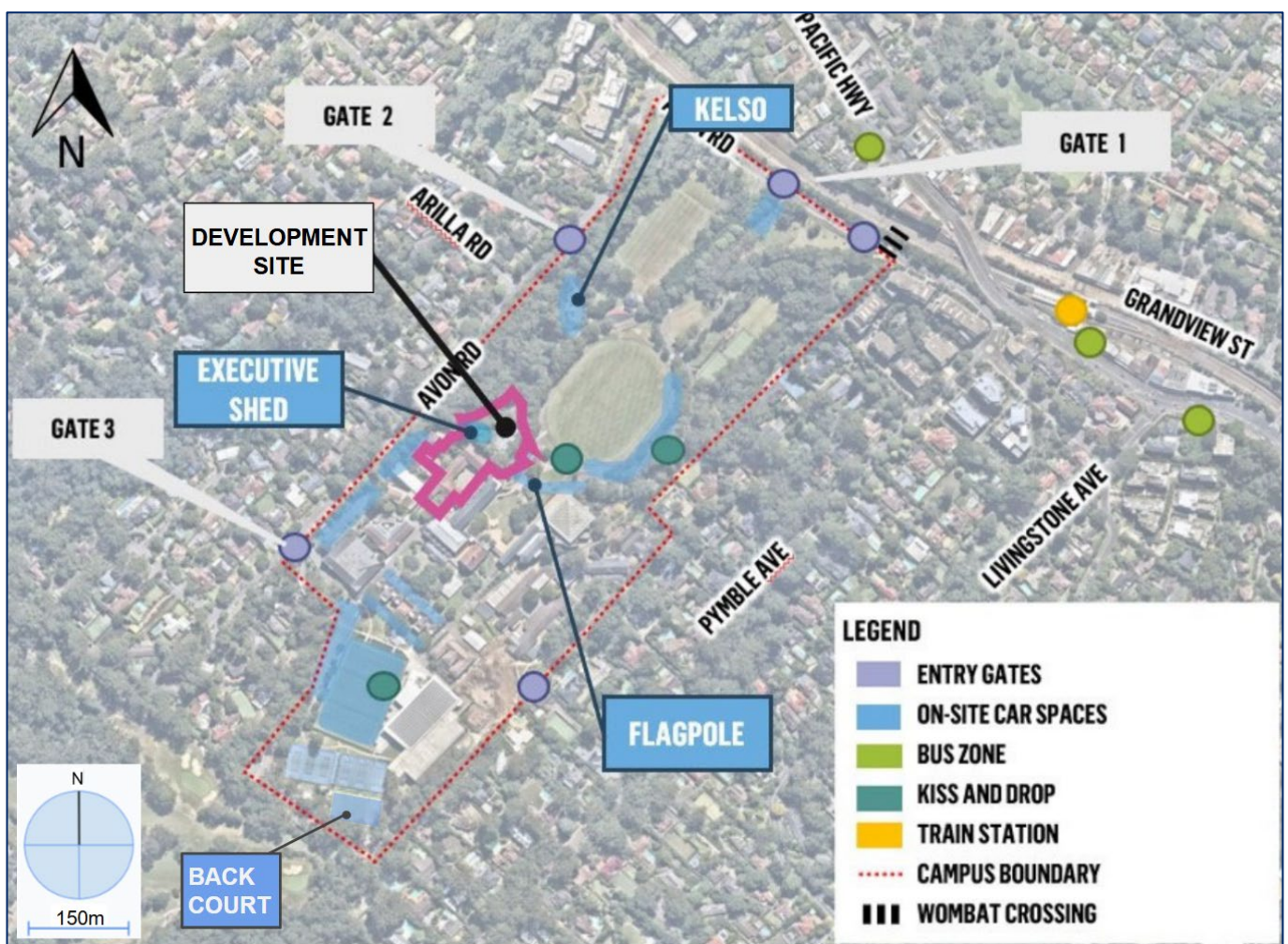


Figure 4 | Existing access, DOPU and car parking within the PLC campus (Base source: Applicant's EIS 2025)

1.2.4 PLC Masterplan 2019

25. PLC developed a campus Master Plan in 2020 to guide future development within the school campus (**Figure 5**). The Applicant states that the Master Plan highlighted the need for additional learning spaces, as existing facilities were at capacity, forcing the use of common areas like the library for classrooms. The SIP was identified to address the need for new facilities for secondary school students. The Master Plan also included the Grey House Precinct, a Boarding Precinct and Hall Refurbishment. The Applicant advises that the school reviewed the Masterplan in 2021 and determined that the Boarding Precinct and Hall Refurbishment would not go ahead.

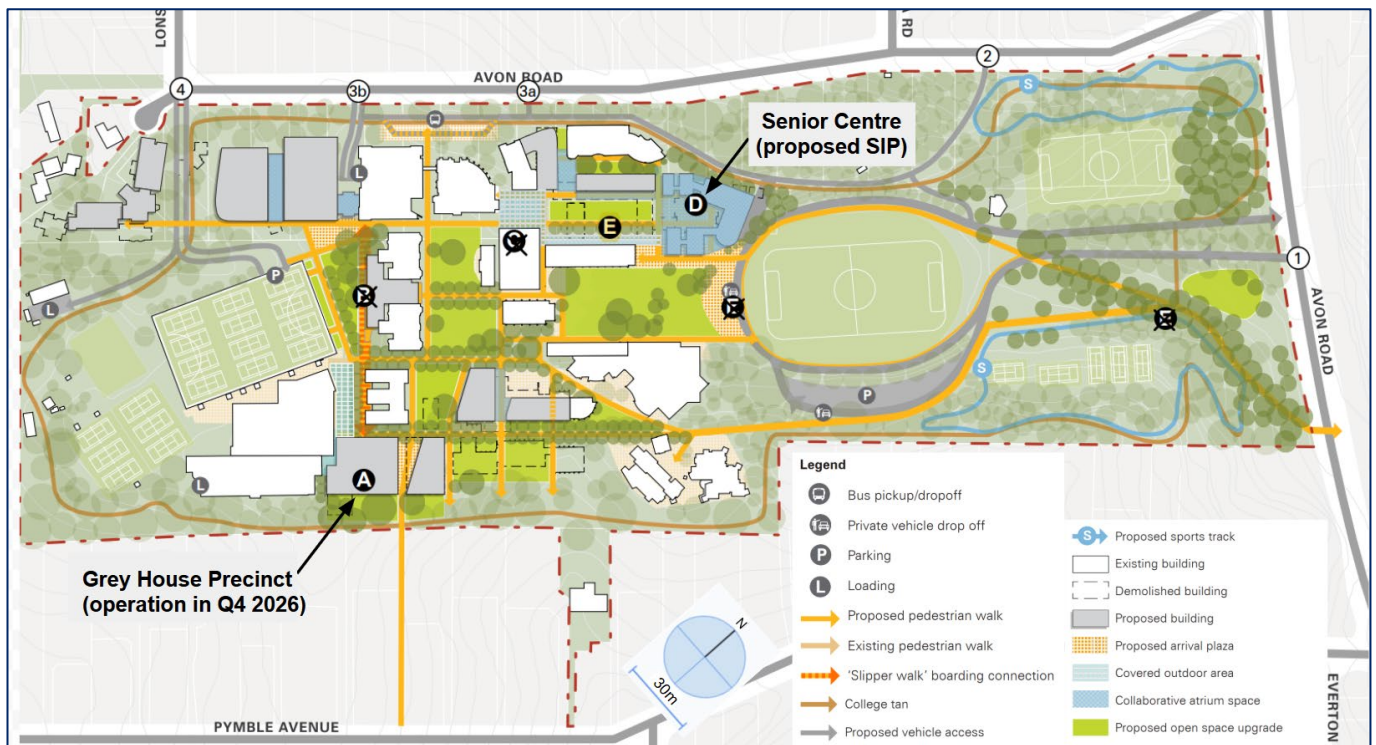


Figure 5 | Current PLC Master Plan (Base Source: Applicant's EIS 2025)

1.2.5 Description of the development site

26. The development site currently contains school buildings, connecting structures and walkways, hardstand common areas and established trees and vegetation.
27. Existing school buildings within the development site include the Isabel McKinney Harrison, Dorothy Knox, John Vicars, and Robert Vicars buildings (**Figure 6**).
28. Existing landscaping within the development site is spread between existing school buildings, and along an adjoining 3.6m wide service road which runs along the north-west side of the development site. BGHF is located at the northern portion of development site.

29. School buildings and other existing features within the development site are provided in Figure 7 to Figure 12.

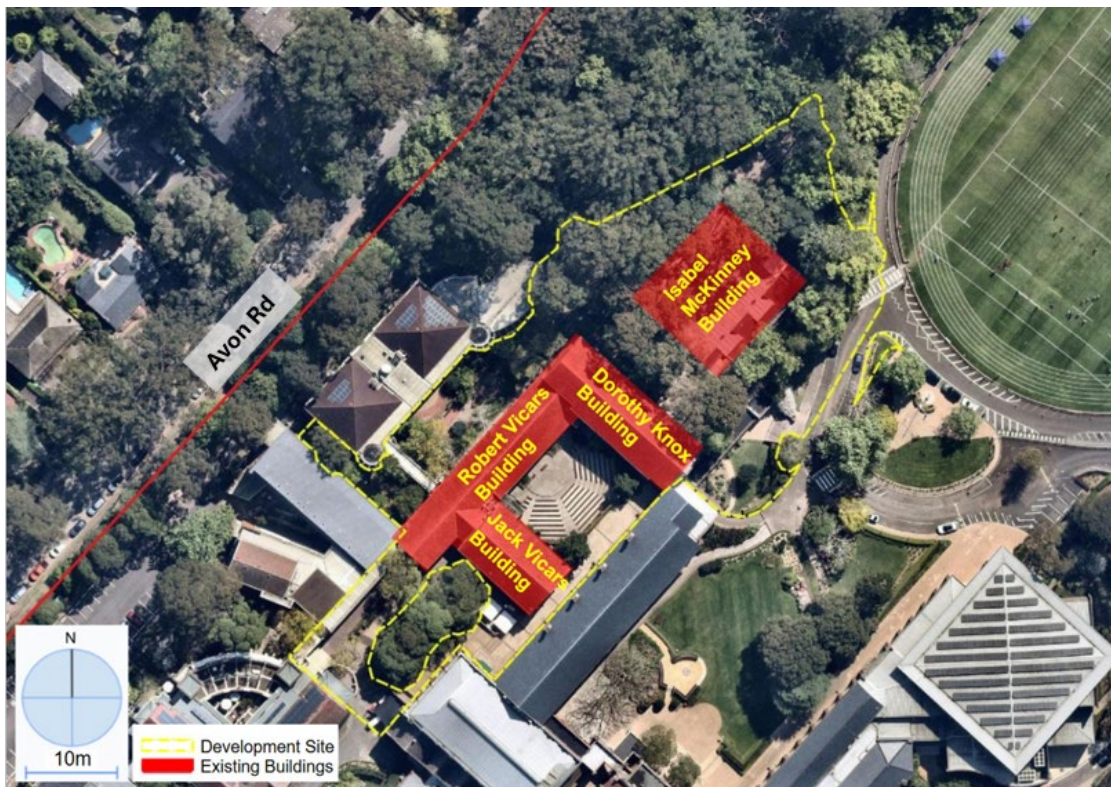


Figure 6 | Existing buildings proposed for demolition within the development site (Base source: Nearthmaps 2026)



Figure 7 | Dorothy Knox building within the development site (Source: Applicant's EIS 2026)



Figure 8 | Robert Vicars building and connecting walkway within the development site (Source: Applicant's EIS 2026)



Figure 9 | Isabel McKinney Harrison building within the development site (Source: Applicant's EIS 2026)



Figure 10 | John Vicars building within the development site (Source: Applicant's EIS 2026)



Figure 11 | spotted gum trees (proposed for removal) within the development site (Source: Department site visit 2025)



Figure 12 | Rear access road adjoining the development site on the northwest side of the development site (Source: Department site visit 2025)

1.2.6 Development surrounding the SIP

30. The development site is in the central northwestern portion of the PLC campus and adjoined by existing PLC campus school buildings, vegetation and a service road (**Figure 3**).
31. Development surrounding the development site, outside of the PLC campus, consists of residential properties along Avon Road. Most of these properties contain gardens within their front setbacks and face the PLC campus' northwest boundary, looking onto established trees and vegetation located in the PLC campus generally where the SIP is proposed.
32. The location of dwelling houses opposite the development site along Avon Road are shown in **Figure 13**.

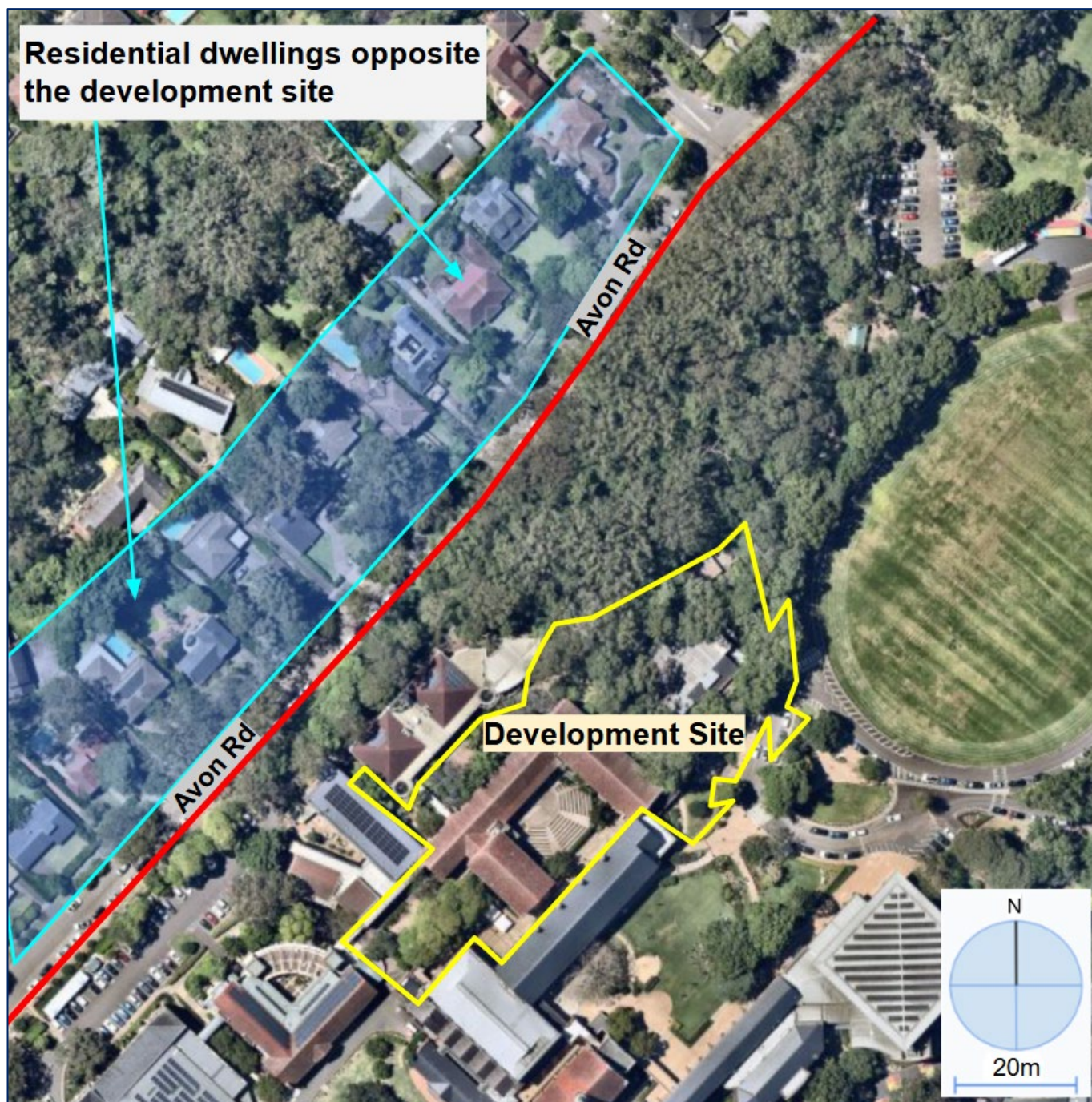


Figure 13 | Location of residential dwellings opposite the development site (Base source: Nearmap 2026)

1.2.7 Public transport

33. Pymble train station is located approximately 200m north of the PLC campus. The station is located on the T1 North Shore, Northern and Western line, which provides connection to Hornsby in the north and Sydney CBD via Chatswood in the south.
34. The PLC campus is connected to public and private bus services. Existing bus stops are located along Pacific Highway, which provide bus connection to Macquarie University and

Hornsby from the campus. PLC provides privately operated bus services along 5 routes for students, between 9am and 3.30pm on school days.

1.3 Project background

- 35. PLC was established in 1916 and has undergone successive stages of development to support its continued operation as an educational establishment.
- 36. The Applicant states that the SIP is required to support contemporary senior secondary education and to address limitations of existing buildings by consolidating senior school teaching and learning functions within a defined precinct. The SIP would replace several existing buildings and reconfigure internal campus circulation and spatial relationships.
- 37. The design of the SIP was reviewed by the NSW State Design Review Panel (SDRP), with the design refined in response to the Panel’s advice. The SIP has been prepared having regard to the College’s campus masterplan and follows earlier major redevelopment approvals across the site, including the Grey House Precinct, representing a subsequent stage in the staged implementation of the masterplan.

1.4 Related projects and works

- 38. Previous SSD applications that relate to the site are summarised in **Table 1**.

Table 1 | Related SSD applications

DA / CDC Number	Description	Consent authority	Determination date
SSD-5314	Demolition of the existing outdoor pool, construction of a new aquatic and fitness centre, dining and function centre and healthcare facility, relocation of the Mollie Dive Field with car parking beneath, minor upgrades to the Jeanette Buckham PE Centre, and associated landscaping and infrastructure works.	The Department	9 July 2023

DA / CDC Number	Description	Consent authority	Determination date
DA/2010/650/1	Redevelopment of the Grey House Precinct comprising demolition of existing buildings, construction of new teaching and learning facilities, refurbishment and adaptive reuse of Grey House, reconfiguration of internal circulation, landscaping works, and associated site infrastructure and services.	Independent Planning Commission (IPC)	9 December 2022

2 Project

2.1 Project overview

39. The key aspects of the project are provided in detail in section 1.3 ‘The Project’ of the EIS and are outlined in **Table 2**.

Table 2 | Key aspects of the project

Aspect	Description
Project summary	Demolition of 4 school buildings, construction and operation of a new part 4, part 6-storey high school building and construction of a common area including an amphitheatre and open space. No change to student and staff numbers, school use or hours of operation.
Site area	• 20ha (PLC campus) • 10,856 sqm (development site).
Tree removal, demolition and earthworks	• Demolition and removal of 4 existing school buildings and structures including: – Isabel McKinney Harrison building – Dorothy Knox building – John Vicars building – Robert Vicars building – connecting walkways and handstand common areas • Removal of 127 trees • Excavation of a basement level.
Built form and use	• Construction of a part 4, part 6-storey high school building for: – general learning spaces – Science, Technology, Engineering and Mathematics (STEM) teaching spaces – senior student facilities and function spaces – food and beverage facilities – associated amenities, storage and building services

Aspect	Description
	• Bridging, connection, and minor interface works to support retained school buildings directly adjoining those proposed for demolition • A hardstand amphitheatre and connecting open spaces to connect the SIP to the surrounding school campus.
Building height	• A maximum of 29.68m.
Gross floor area (GFA)	• 10,300 square metres (sqm).
On-site water management	• On Site Detention (OSD) including: – below ground OSD tank integrated within the basement footprint – concealed subsurface stormwater storage infrastructure – rainwater storage tanks for capture of rooftop runoff.
Open space and landscaping	• Removal of 127 trees • Landscaping works including planting 61 trees • 5 landscaped and open space areas including: – soft and hard landscaping to external staggered terraced sections, and internal areas of the new 5 storey building (SIP) – soft and hard landscaped open space in front of the new building entry and between the Campus Commons and DOPU area ('The Flagpole Plaza') – soft and hard landscaped open space in between retained school buildings and the new school building as a central connecting area between the established campus and new building ('The Campus Commons') – a hard landscaped / stepped amphitheatre ('The Amphitheatre') – a soft and hard landscaped open space area boarded on 3 sides by existing school buildings ('The Conde Lawn').
Access	• Access for loading and unloading by the existing internal rear access road, directly adjoining the new school building • Pedestrian access routes provided through new pathways within new landscape areas, connecting to existing pedestrian pathways surrounding the SIP.

Aspect	Description
Drop-off/pick-up (DOPU)	• Maintain existing DOPU areas/spaces, including in front of the new SIP building (4 DOPU SIP bays).
Parking	• A 10 space reduction in the number of staff and visitor parking spaces, reinstatement of 5 spaces which are currently used for storage (to a total of 426 formal on-site parking spaces).
Hours of operation	• No change to existing school hours of operation: – Monday to Friday: 7:30am to 6pm – Saturday school run special events: 8am to 4pm – Sunday school run special events: 10am to 4pm – No SIP community use proposed.
Jobs	• Approximately 92 – 115 construction jobs (no operational jobs).
Estimated Development Cost (EDC)	• \$99,674,252.

2.2 Physical layout and design

40. The Applicant states that the SIP is positioned to operate as a new internal focus within the PLC campus, with east-west connections between existing and retained Upper School, Science Centre and Colonnade school buildings.
41. The development site would include the part 4, part 6-storey SIP building, the Campus Commons lawn areas and stepped amphitheatre, and other open space areas arranged as an integrated precinct within the central-western part of the PLC campus. The proposal would replace a group of existing buildings and form a clear built edge to the east, and a consolidated open space to the west. The precinct would be inward facing with built form, access and activity facing the internal campus not the public domain (**Figure 14**).
42. The SIP building would be located along the eastern side of the precinct, while the Campus Commons extends west as a series of connected lawn areas and stepped amphitheatre (**Figure 14**).

43. The amphitheatre is positioned within the Campus Commons providing stepped seating integrated into the site levels. The surrounding lawn areas link the amphitheatre, the SIP building and existing campus open areas (**Figure 14**).
44. The SIP building would be a part 4, part 6 storey building, organised around a central atrium. Learning spaces, specialist STEM facilities and senior student areas would be arranged vertically, with lower levels directly connected to outdoor terraces and the Campus Commons.
45. The SIP building's massing steps up toward the north with its northern facade presenting as a 6-storey building. Upper storeys step back from the Campus Commons, presenting as 4 storeys with recessed building facades when viewed from the open space and forecourt areas (**Figure 22**).

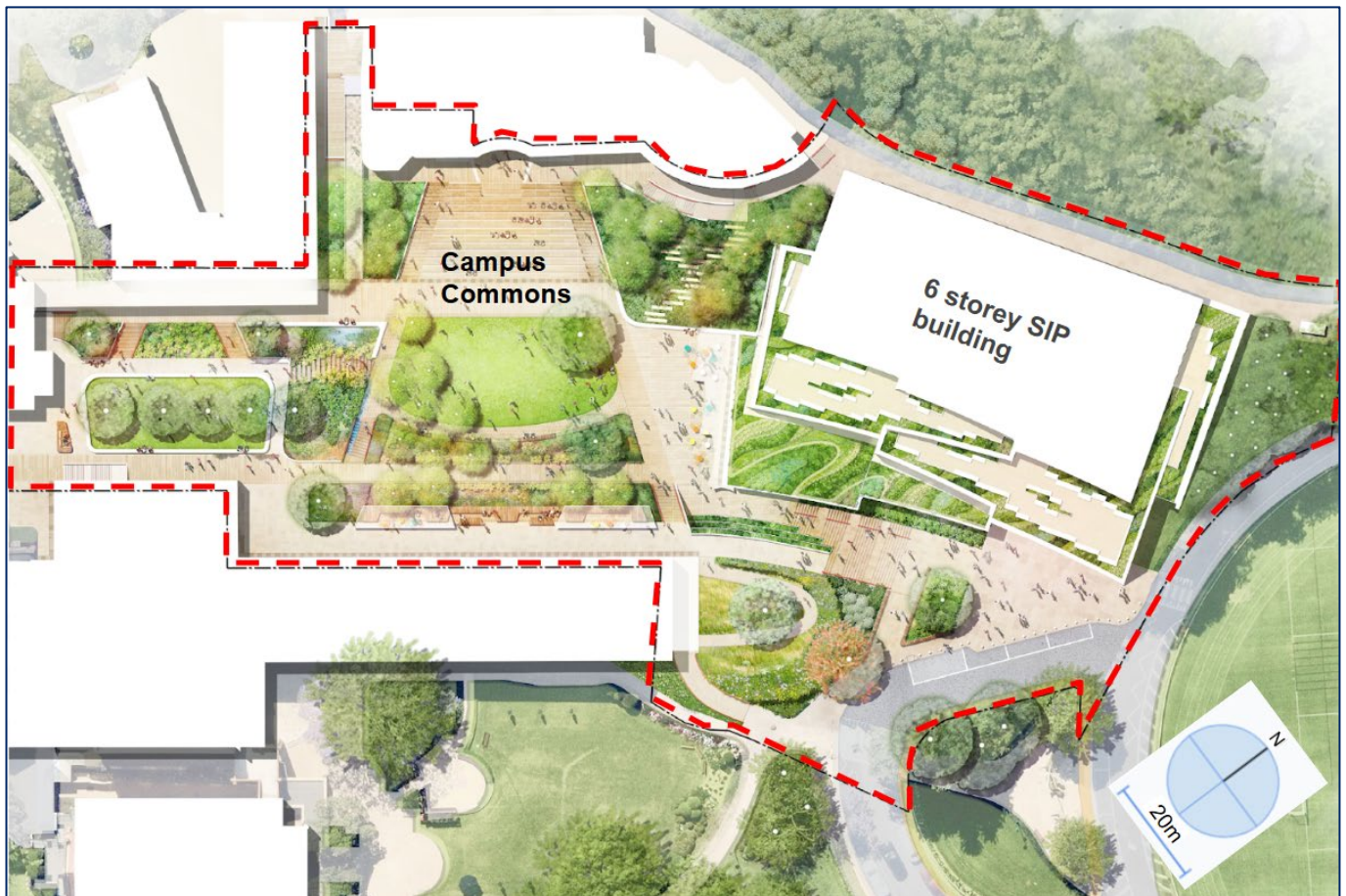


Figure 14 | Site layout (Base source: Applicant's EIS 2025)

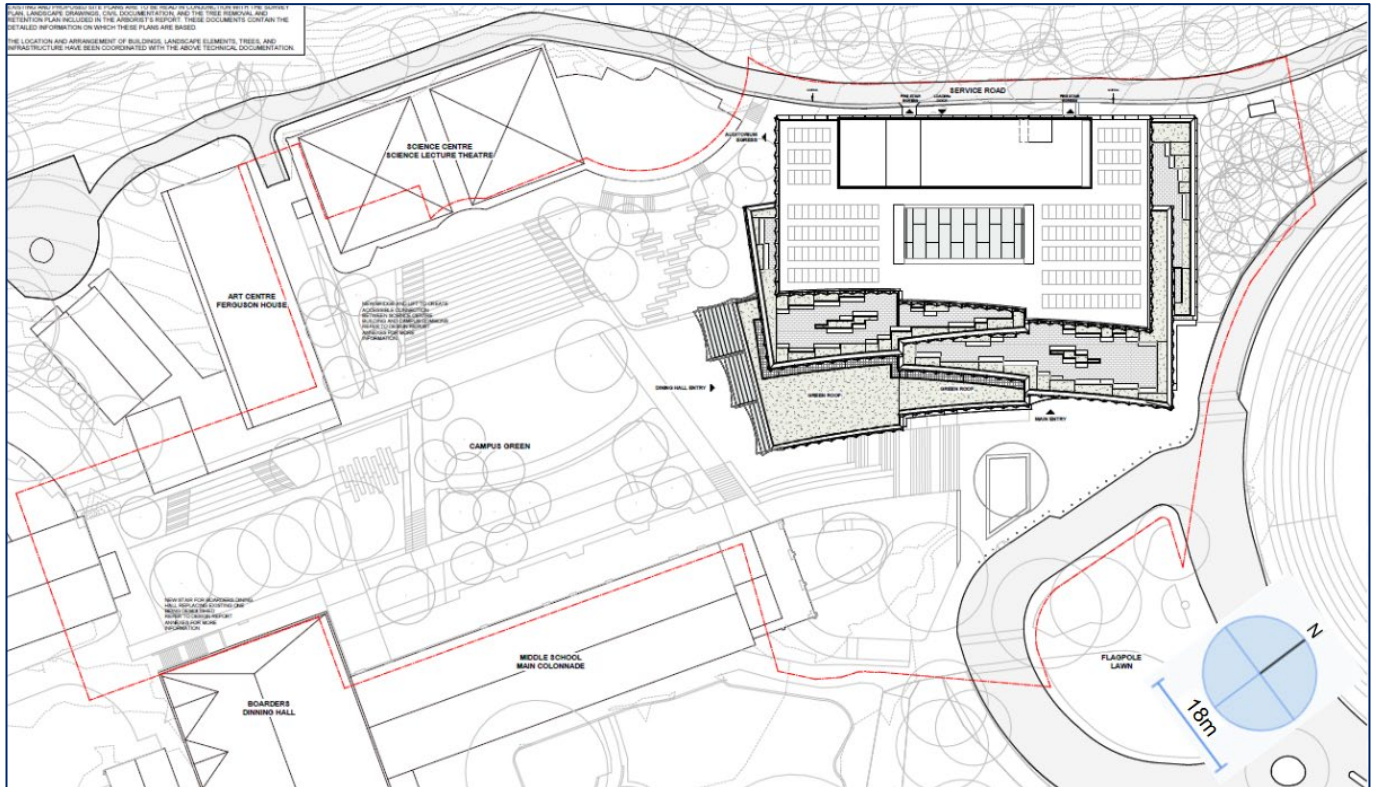


Figure 15 | Site plan (Base source: Applicant’s EIS 2025)

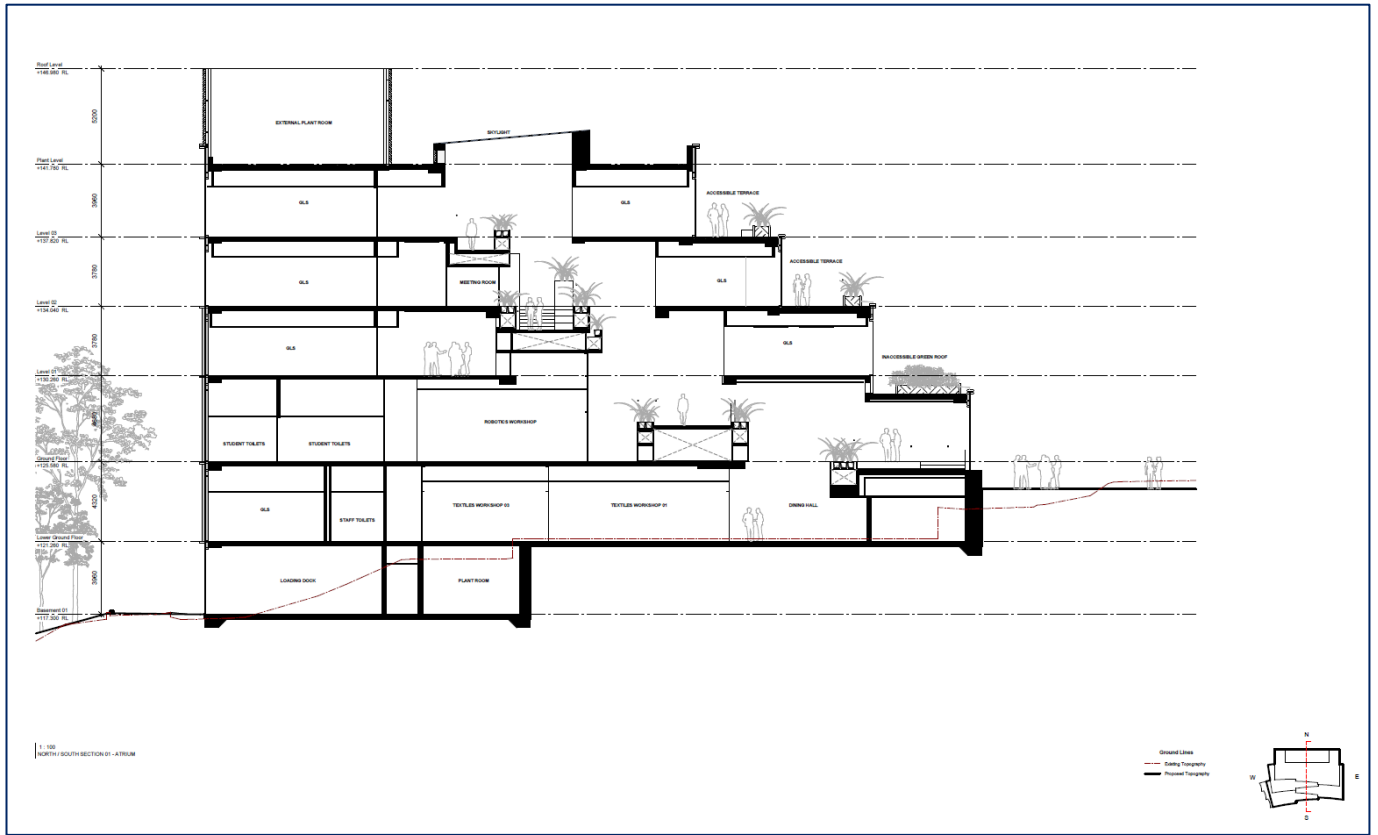


Figure 16 | North south section (Source: Applicant’s EIS 2025)

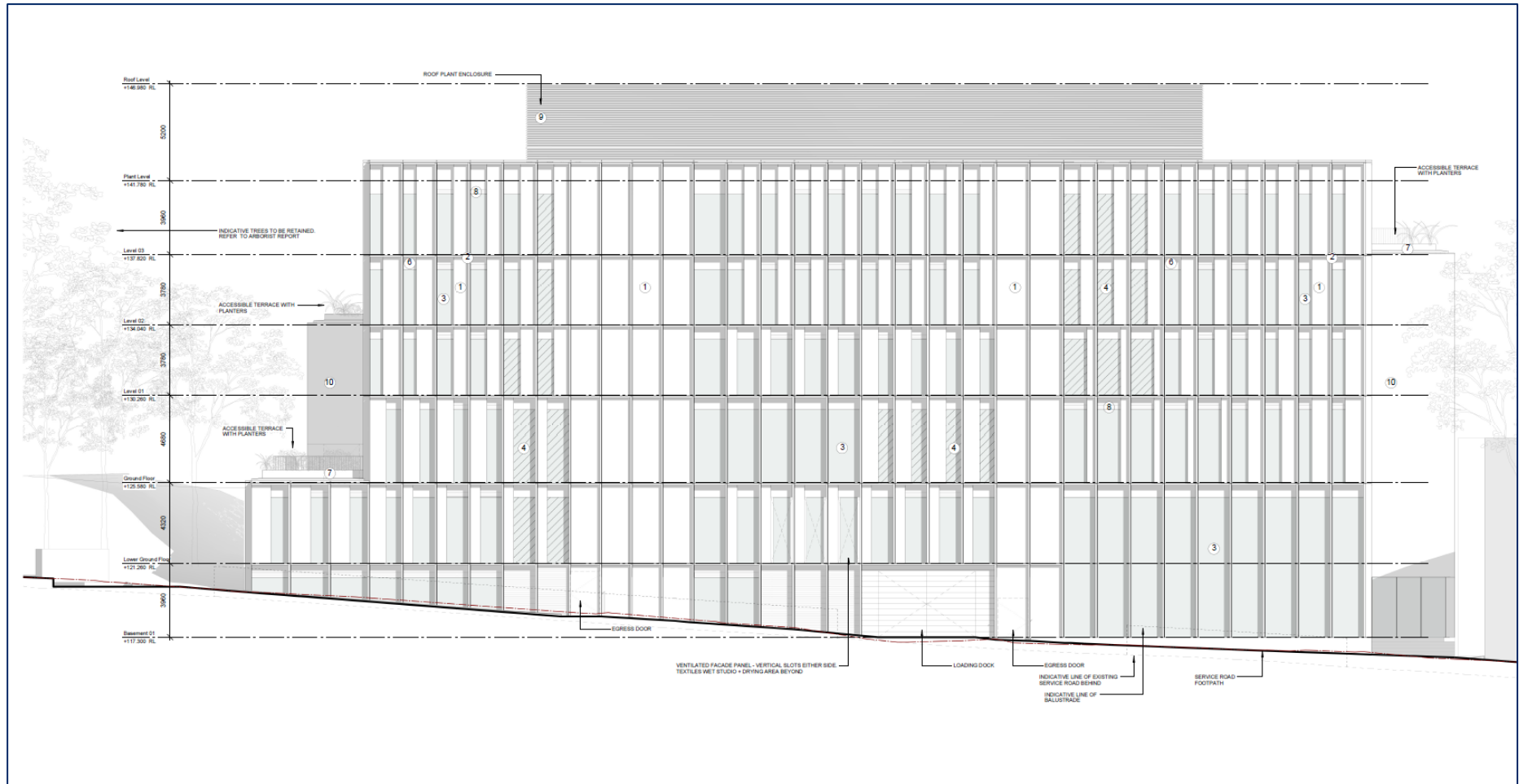


Figure 17 | North elevation (Source: Applicant's EIS 2025)

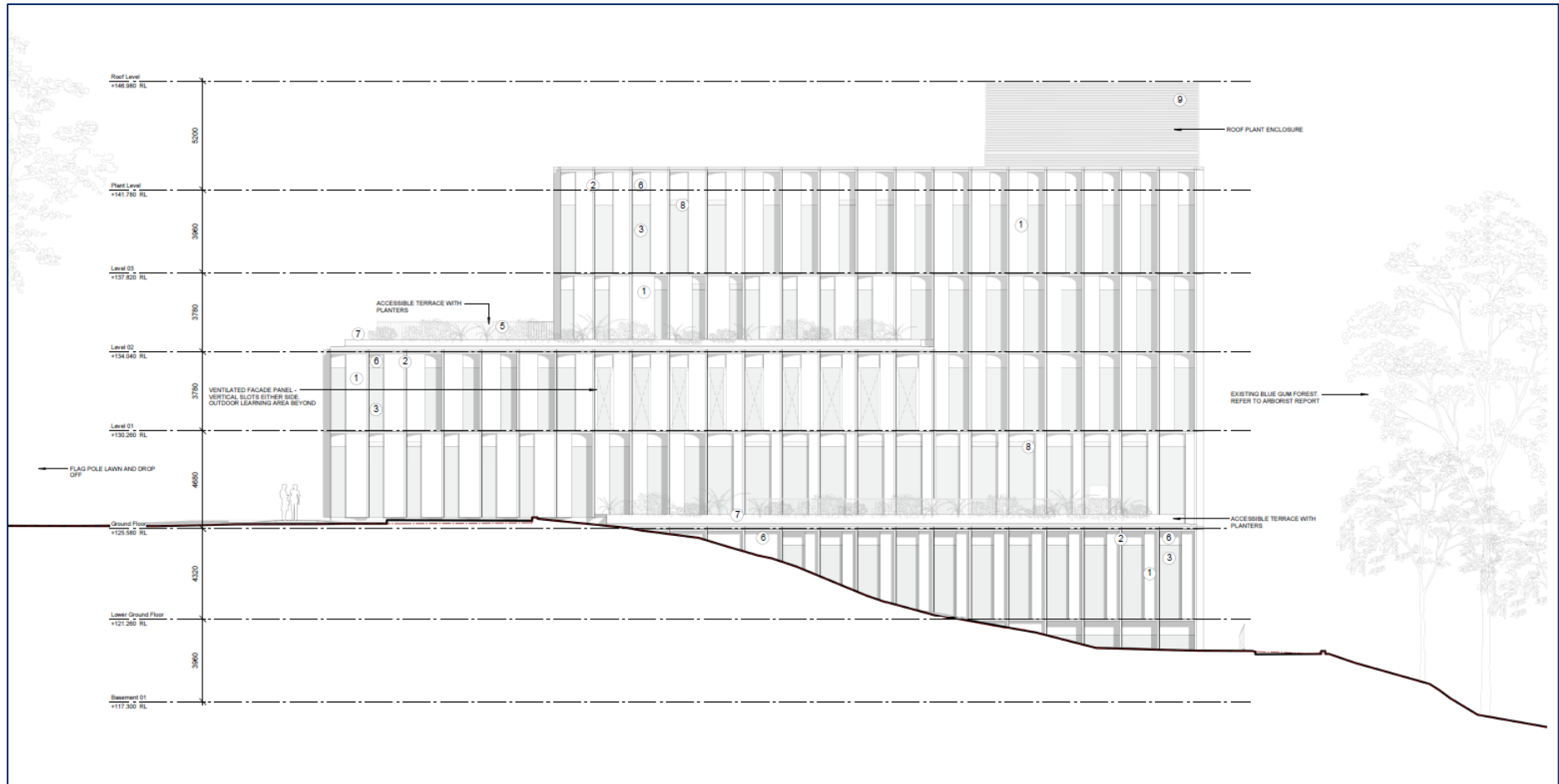


Figure 18 | East elevation (Source: Applicant's EIS 2025)

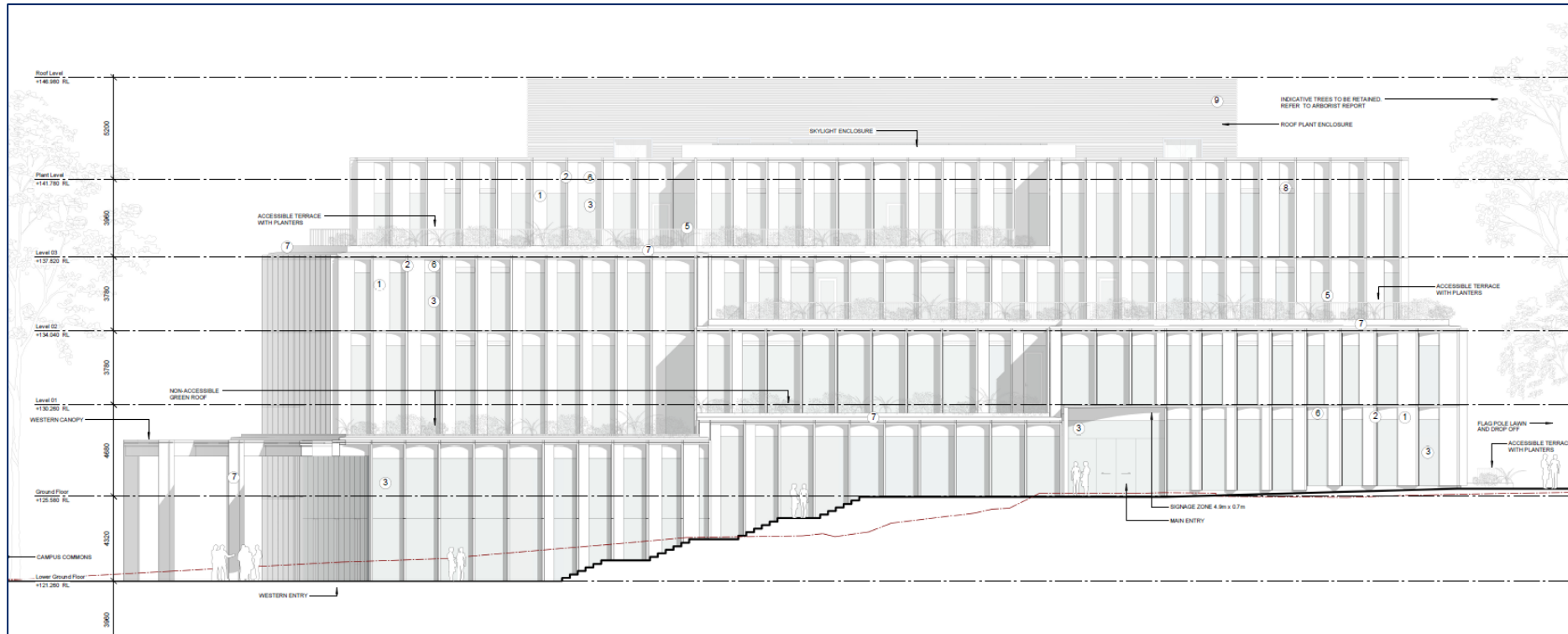


Figure 19 | South elevation (Source: Applicant's EIS 2025)

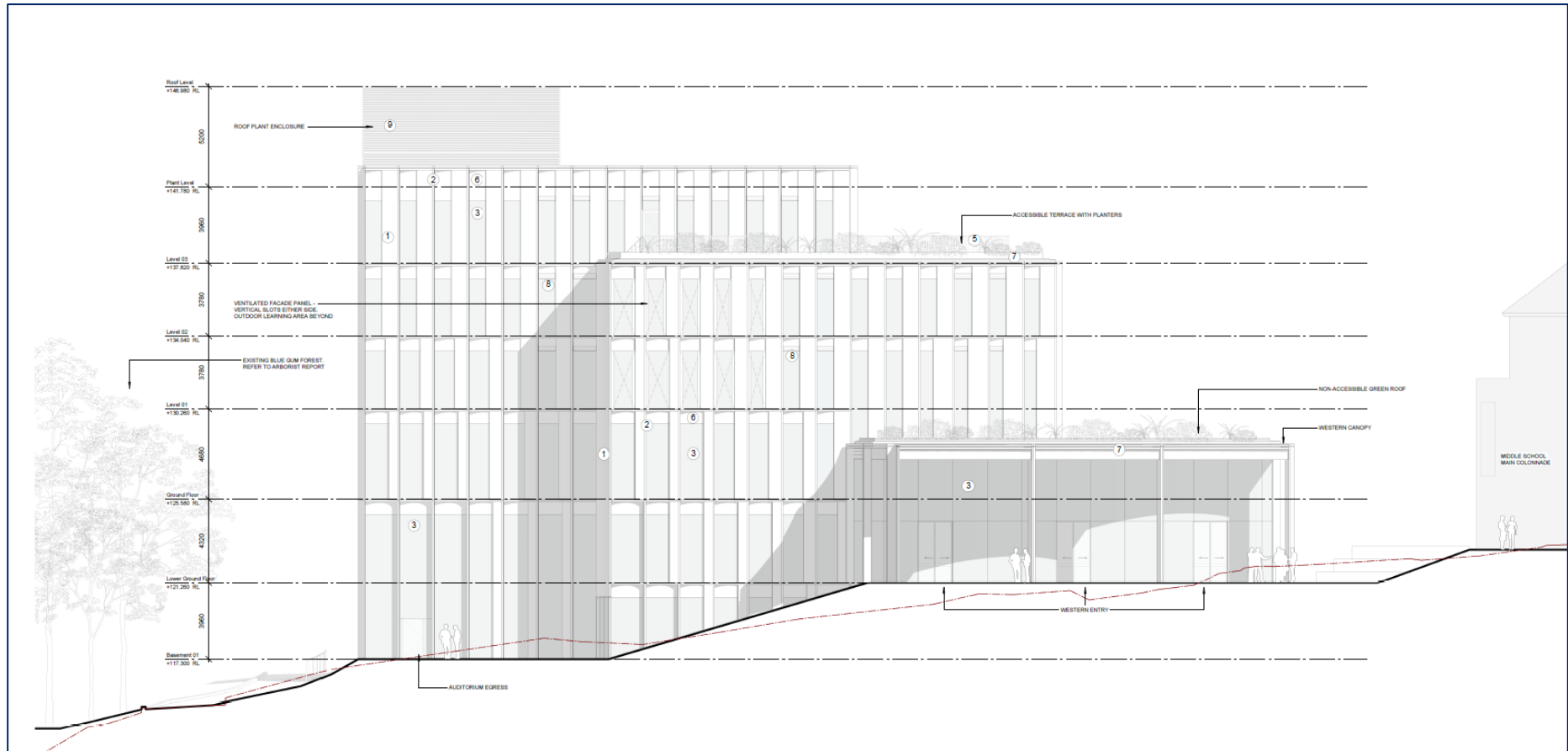


Figure 20 | West elevation (Source: Applicant's EIS 2025)



Figure 21 | East west section (Source: Applicant’s EIS 2025)



Figure 22 | Render perspective viewed from the east towards the SIP building entrance (Source: Applicant’s EIS 2025)



Figure 23 | Aerial view render perspective looking north-east over the SIP (Base source: Applicant's RFI response 2026)

2.3 Uses and activities

46. The SIP would be used as a secondary (high school) education precinct within the PLC campus, serving secondary school students and staff. The use of the precinct is consistent with the approved use of the site as an educational establishment.
47. The SIP building would accommodate secondary school teaching and learning functions, including general learning areas, specialist STEM facilities, collaborative learning spaces and staff areas. Activities within the building would occur during standard school operating hours.
48. The Campus Commons, including lawn areas, terraces and the amphitheatre, would be used for school related activities such as informal learning, student gathering, circulation between classes and scheduled school events. These spaces would function as internal campus areas ancillary to the operation of the school.
49. No community or external use of the SIP is proposed. All uses and activities within the precinct will be limited to students, staff and invited school visitors, including during special school related events.

50. School special events would primarily comprise robotics competitions held intermittently during weekends or school holidays. These competitions would take place within the SIP building's auditorium. The auditorium would also accommodate other school events such as family presentations, exhibitions and performances, with all such activities remaining ancillary to the operation of the school.

2.4 Timing and sequencing

51. The Applicant proposes that the SIP be constructed in a single stage over a 24-month period, with 3 construction phases detailed for proposed works.
52. Continued operation of the remaining PLC campus is proposed during the construction of the project. No operational staging of the proposal is proposed.
53. The SIP would commence operation following completion of construction and occupation of the proposed building and completion of associated external areas.
54. The Applicant has provided key phases for construction of the project which are summarised in **Table 3**.

Table 3 | SIP construction timing

Phase	Activity	Works
Phase 1	Demolition and enabling works	• Demolition of school buildings • Tree removal • Site preparation including: – reinforcement of pathways – site accommodation/facilities – on-site construction worker parking – sediment controls – construction related signage – instillation of safety barriers • Relocation of existing services.
Phase 2	Construction	• Excavation • Substation installation • Grading of ground surfaces • Construction of the: – 5 storey SIP building – amphitheatre

Phase	Activity	Works
		• Preparation of soft landscaping areas and open space • Civil works.
Phase 3	External works and Landscaping	• Remaining civil works • Service connections • External hardstand areas and hard landscaping • Soft landscaping including tree planting • Removal of building materials, construction signage, carparking and site accommodation/facilities.

3 Strategic context

3.1 Key strategic issues

55. The project is largely consistent with the strategies, plans and policies outlined **Table 4**.

Table 4 | Summary of government strategies, plans and policies

Strategy, plan or policy	Consistency	Comments
Greater Sydney Region Plan (2018)	Consistent	The plan aims to transform land use and transport patterns to improve Greater Sydney's liveability, productivity and sustainability by spreading the benefits of growth. The project would be consistent with objectives relating to infrastructure required to meet communities' changing needs The project would be consistent with objectives relating to net-zero emissions by 2050 and climate change.
North District Plan (2018)	Consistent	The plan aims to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan at a district level. The project would be consistent with objectives relating to provision of social infrastructure to meet people's changing needs.
State Infrastructure Strategy 2022–2042 (2022)	Consistent	The strategy aims to plan infrastructure needs for ongoing population growth and integrated infrastructure, land use and service planning. The project would align with the strategy as it would provide new school facilities with a focus on innovative education for changing educational needs.

Strategy, plan or policy	Consistency	Comments
<i>Ku-ring-gai Local Strategic Planning Statement (LSPS) (2016)</i>	Consistent	The Ku-ring-gai LSPS provides a 20-year planning vision with an emphasis on jobs, homes, and infrastructure in conjunction with the identified priorities of the local community. The project would be consistent with the LSPS as it would replace aging educational facilities and strengthen the areas education sector. In particular, the project is consistent with: • Local Priority K1 - Providing well-planned and sustainable infrastructure to support growth and change. The project would upgrade the PLC campus with new facilities and offer enhanced educational outcomes for the community. • Local Priority K42 - Managing waste outcomes that are safe, efficient, cost effective, maximise recycling, and that contribute to the built form and liveability of the community. The project would prioritise energy efficiency and the use of sustainable materials, ensuring long-term environmental and economic benefits.

4 Statutory context

4.1 Permissibility and assessment pathway

56. Details of the legal pathway under which consent is sought, and the permissibility of the project are provided in **Table 5** below.

Table 5 | Permissibility and assessment pathway

Consideration	Description
Assessment pathway	State significant development • The project is declared State significant development (SSD) under section 4.36 of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) as it satisfies the criteria under section 2.6(1) of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP). • The proposed development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the EP&A Act, and the proposed development is specified in section 15(1)(a) of Schedule 1 of the Planning Systems SEPP, being development for the purpose of a new school with an EDC of more than \$20 million.
Consent authority	Independent Planning Commission • The IPC is the declared consent authority under section 4.5(a) of the EP&A Act and section 2.7(1) of the Planning Systems SEPP.
Permissibility	Permissible with consent • The site is located in a SP2 Infrastructure – Educational Establishment zone under the Ku-ring-gai Local Environmental Plan (KLEP) 2015. Educational establishments are permissible with development consent in the SP2 zone.

4.2 Other approvals and authorisations

57. The project will not require an environment protection licence issued by the NSW Environment Protection Authority under section 42 of the *Protection of the Environment Operations Act 1997*.

58. Under section 4.41 of the EP&A Act, other authorisations required under other Acts are not required for SSD. This is because all relevant issues are considered during the assessment of the SSD application.
59. Under section 4.42 of the EP&A Act, certain approvals cannot be refused if they are necessary to carry out the SSD (e.g. approvals under the *Roads Act 1993*). These authorisations must be substantially consistent with any SSD development consent for the project.
60. The Department has consulted with and considered the advice of the relevant government agencies responsible for these other authorisations in its assessment of the project (see **Section 5** and **Section 6**). Suitable conditions have been included in the recommended conditions of consent (see **Appendix E**).

4.3 Planning Secretary’s environmental assessment requirements

61. The Department’s review determined that the EIS addresses each matter set out in the Planning Secretary’s environmental assessment requirements (SEARs) issued on 16 January 2025 and is sufficient to enable an adequate consideration and assessment of the project for determination purposes.

4.4 Mandatory matters for consideration

4.4.1 Matters of consideration required by the EP&A Act

62. Section 4.15 of the EP&A Act sets out matters to be considered by a consent authority when determining a development application. The Department’s consideration of these matters is shown in **Table 6**.

Table 6 | Matters for consideration

Matter for consideration	Department’s assessment
Environmental planning instruments, proposed instruments, development control plans & planning agreements	Appendix D
EP&A Regulation	Appendix D

Matter for consideration	Department's assessment
Likely impacts	Section 6 - Assessment
Suitability of the site	Section 3 - Strategic Context and Section 6 - Assessment
Public submissions	Section 5 - Engagement and Section 6 - Assessment
Public interest	Section 5 - Engagement and Section 6- Assessment

4.4.2 Objects of the EP&A Act

63. In determining the application, the consent authority should consider whether the project is consistent with the relevant objects of the EP&A Act (s 1.3) including the principles of ecologically sustainable development. Consideration of those factors is described in **Appendix D**.
64. As a result of the analyses in **Appendix D**, the Department is satisfied that the development is consistent with the objectives of the EP&A Act and the principles of ecologically sustainable development (ESD).

4.4.3 Biodiversity development assessment report

65. Section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act) requires all SSD applications to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the project is not likely to have any significant impact on biodiversity values (as identified in the BC Act and in the *Biodiversity Conservation Regulation 2017*).
66. The EIS included a BDAR (see **Appendix B**). The BDAR and the overall impact of the project on biodiversity values is assessed in **Section 6.2**.

5 Engagement

5.1 Exhibition of the EIS

5.1.1 Public exhibition of the EIS

67. After accepting the EIS, the Department:
- publicly exhibited the project from 8 July to 6 August 2025 on the NSW Planning Portal
 - notified occupiers and landowners in the vicinity of the site about the public exhibition
 - notified and invited comment from relevant government agencies and Ku-ring-gai Council (Council).

5.1.2 Summary of advice received from government agencies

68. The Department received advice from five government agencies on the EIS.
69. A summary of the agency advice is provided in **Table 7**. A link to the full copy of the advice is provided in **Appendix C**.

Table 7 | Summary of agency advice

Agency	Advice summary
Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change Energy, the Environment and Water	CPHR reviewed the EIS and supporting biodiversity, arboricultural and flood assessment documentation and identified the following issues: <u>Biodiversity</u> - insufficient effort made to avoid impacts on Blue Gum High Forest (BGHF), which is a Critically Endangered Ecological Community (CEEC) and a Serious and Irreversible Impact (SAIL) entity under the <i>Biodiversity Conservation Act 2016</i> - three mature and highly significant trees (Trees 61, 71 and 85) are proposed to be removed despite being located near the proposed building footprint and representing a development constraint - the BDAR does not adequately demonstrate avoidance of impacts to CEEC/SAIL vegetation, contrary to the Biodiversity Assessment Method (BAM), the SEARs, relevant planning controls and strategic planning objectives - the BDAR identifies potential impacts to threatened microbat species through demolition of existing structures and vegetation clearing, without sufficient detail on mitigation measures

Agency	Advice summary
	- the executive summary of the BDAR inaccurately describes impacts to PCT 3136 (BGHF) by referring only to groundcover impacts and not acknowledging the removal of BGHF trees - the Arboricultural Impact Assessment (AIA) does not demonstrate how trees proposed to be retained would be viably protected during construction and relies on future design development rather than documented avoidance and minimisation outcomes - the BDAR case was not accessible in the Biodiversity Offsets and Agreement Management System (BOAMS), and no digital files were provided, limiting review of the BDAR. <u>Actions recommended</u> - add 'Greater Sydney – Compliance & Regulation' as a case party in BOAMS, upload all required digital files and submit the case for review - the design be amended, in consultation with a suitably qualified AQF Level 5 arborist, to enable the viable retention of Trees 61, 71 and 85, and the BDAR be updated accordingly - the BDAR mitigation measures be updated to include pre-demolition surveys for microbats, pre-clearing fauna surveys and supervised vegetation removal, and reuse of suitable removed tree material (including hollows, trunks and root balls) to enhance habitat within on-site management areas - the executive summary of the BDAR be revised to accurately describe the extent of impacts to BGHF, including tree removal - the AIA, Tree Protection Plan and associated drawings be updated to demonstrate viable tree retention in accordance with AS 4970-2025. <u>Flooding risk management</u> - the site is not identified as flood prone land - the development footprint is in the upstream area of Avondale Creek catchment and adjacent to a minor tributary and runoff from the small area upstream of the site is less than 20 m³/s - the habitable floor should be identified in accordance with clause 3 of the Kuring-gai DCP Section 24D.3. Table 3 of the flood assessment should reflect this clause. - no further flood risk management input is required.

Agency	Advice summary
Transport for NSW (TfNSW)	TfNSW reviewed the EIS and supporting Traffic Impact Assessment (TIA) and identified: - the proposed development would replace existing educational buildings with no net increase in student or staff numbers, would not generate additional demand for car parking and no on-site car parking is proposed. - all vehicular access to the site is via the local road network, the site is located some distance from the nearest classified road (Pacific Highway) and the proposal is therefore unlikely to result in any significant impacts on the classified road network. TfNSW advised that: - no transport-related requirements are necessary, as the proposal would not adversely affect the classified road network.
Heritage NSW (ACH) (HNSW ACH)	Heritage NSW reviewed the EIS and supporting Aboriginal Cultural Heritage Assessment Report (ACHAR) and identified the following issues: - during consultation, Ku-ring-gai Council identified the Aboriginal Heritage Office as an organisation that should be consulted. It is unclear whether the Aboriginal Heritage Office has been contacted as part of the consultation process - the study area for the project has changed since the ACHAR was finalised, and Registered Aboriginal Parties (RAPs) may not have been provided with updated information reflecting the revised study area and scope of works. Recommended actions: - confirmation be provided as to whether the Aboriginal Heritage Office was contacted during consultation, and if not, that the organisation be contacted and invited to register for consultation on the project - all Registered Aboriginal Parties be provided with an update on the project to ensure RAPs are kept informed of changes to the study area and the status of the project.
NSW Rural Fire Service (NSW RFS)	NSW RFS advised: no specific concerns raised relating to bush fire protection and no further consultation with NSW RFS is required for the project.

Agency	Advice summary
Fire and Rescue NSW (FRNSW)	FRNSW advised: no comment or recommendations, and no requirements provided for the project beyond that specified by applicable legislation.

5.1.3 Summary of Council submission

70. Ku-ring-gai Council (Council) objected to the project. A summary of the issues raised by Council is provided in **Table 8** and a link to the submission in full is provided in **Appendix C**.

Table 8 | Summary of issues raised by Council

Issues raised	Submission summary
Built form and urban design	<u>Bulk, scale and visual impact</u> - the northern facade presents as 6-storeys plus roof plant, with a height of approximately 29.68m, representing an excessive scale relative to adjacent R2 low-density residential development along Avon Road - the facade lacks sufficient articulation or modulation to reduce perceived bulk - Visual Impact Assessment (VIA) conclusions rely on retention of existing vegetation, despite proposed removal of multiple high-retention trees along the northern boundary which are on higher ground that slopes down towards Avon Road, increasing potential visibility of the building - increased visibility may result in adverse visual and privacy impacts on neighbouring residential properties on Avon Road. <u>Council recommendations</u> - further visual impact analysis that accounts for approved tree removal - additional mitigation measures to reduce visual and privacy impacts. <u>Roof plant enclosure, setbacks, materials and finishes</u> - the roof plant enclosure is located directly adjacent to the northern boundary with no setback, increasing visual prominence when viewed from Avon Road and nearby dwellings - limited information is provided on design detailing and materiality - solid dark grey aluminium louvre panels may appear visually dominant within the residential context.

Issues raised	Submission summary
	<u>Council recommendations</u> • introduce setbacks from the northern boundary and further design refinement of the roof plant enclosure, including materiality, colour and detailing, to reduce visual impact. <u>Environmental design and sustainability</u> • rooftop and podium landscaping is insufficient to mitigate heat island effects and stormwater runoff • facade modulation and durable, low-maintenance materials are not adequately demonstrated, and the use of reflective materials and excessive glazing may result in glare impacts to neighbours • insufficient deep soil zones to support tall tree retention, water infiltration, groundwater protection and BGHF plantings' viability. <u>Council recommendations</u> • incorporate rooftop and podium landscaping and increase deep soil areas • avoid reflective materials and excessive glazing, and use durable, low-maintenance facade materials. <u>Safety</u> • the design does not adequately demonstrate Crime Prevention Through Environmental Design (CPTED) principles. <u>Council recommendation</u> • improve passive surveillance, building orientation and activation of public areas to enhance safety.
Landscaping and tree management	<u>Landscape design and documentation, SEARs compliance and tree impacts/retention</u> • landscape plans lack a detailed planting plan and schedule, including quantities and locations of proposed trees • insufficient information to assess canopy tree outcomes and compliance with SEARs • ESD Report and Green Star Scorecard fail to demonstrate compliance with landscape detail, irrigation and water use requirements • insufficient evidence that nominated retained trees can be viably retained due to TPZ and SRZ encroachments

Issues raised	Submission summary
	• several high-retention indigenous or native trees could potentially be retained with design changes • retention of '<i>Ligustrum sinense</i>' is inappropriate as it is a declared weed species • the landscape proposal does not demonstrate sufficient space to accommodate proposed tall indigenous trees • the 'Blue Gum Garden' area is constrained by buildings and stormwater infrastructure and is unlikely to support nominated species • drawings lack clarity, consistent tree numbering and finished level information within TPZs. <u>Council recommendations</u> • redesign to retain high-value trees where feasible • amend landscape plans to clearly show number, species and location of all trees • update arborist documentation with root mapping and viability assessments • remove weed species and replace with suitable native or indigenous trees.
Biodiversity	<u>BDAR</u> • the site contains approximately 0.19 ha of Blue Gum High Forest, a CEEC and SAI entity • the BDAR does not adequately demonstrate genuine avoidance of impacts as required under the BAM • limited justification is provided for alternative layouts or design options. the conclusion that impacts are not serious and irreversible lacks sufficient site-specific evidence. <u>Vegetation Management Plan (VMP)</u> • the VMP lacks specificity regarding planting quantities, locations and ecological objectives • weed management measures are not adequately detailed • long-term management, monitoring and responsibilities are insufficiently defined.

Issues raised	Submission summary
	<u>Council recommendations</u> • provide further justification of avoidance measures and design alternatives • strengthen SAI assessment with detailed vegetation condition analysis • submit a revised VMP consistent with NSW guidelines, including planting schedules, weed control, monitoring and maintenance.
Engineering	<u>Flood Risk</u> • the site is not affected by mainstream flooding associated with nearby watercourses, including during a 1% AEP event • flooding is limited to shallow, locally generated rainfall runoff and minor overland flows, and available data the Blackbutt Creek Flood Risk Management Study confirms the site's flood risk is minimal • local rainfall runoff can be effectively managed by the proposed civil design and drainage measures • no evacuation or further flood risk mitigation beyond the designed drainage system is required. <u>Water and waste management</u> • insufficient hydraulic calculations are provided to demonstrate compliance with Council's DCP runoff reduction requirements • purpose and functionality of rainwater reuse systems are unclear. basement stormwater disposal and pump-out design information is incomplete • waste storage and servicing arrangements are generally acceptable, subject to conditions. <u>Geotechnical</u> • conditions should be imposed to require dilapidation reports and to require basement excavations to be fully tanked unless ongoing dewatering will be less than 3ML/year and the proposal is approved by NSW DPI Office of Water. <u>Council recommendations</u> • submit water balance modelling and OSD calculations to show compliance with Council's DCP requirements

Issues raised	Submission summary
	• plans should clearly show OSD details • clarify the rainwater reuse strategy and provide basement stormwater and pump-out system details • impose conditions for basement tanking and dilapidation reports.
Traffic and parking	<u>Operational parking and events</u> • no operational traffic impacts are expected, only minor on-site parking impacts due to the permanent loss of 4 on-site parking spaces, which is not clearly detailed as to their current allocation and the impact of their loss • adequacy parking (on-site and off-site) for special events on weekends and school holidays has not been demonstrated • existing allocation of the 10 parking spaces proposed for temporary use by construction workers is unclear. <u>Construction parking and traffic</u> • temporary construction worker use of 10 parking spaces during construction requires clarification • proposed design vehicles are subject to change and should be assessed during the preparation of a detailed Construction Traffic Management Plan (CTMP). <u>Council recommendations</u> • clarify parking allocations and mitigation measures to address permanent and temporary loss of staff parking spaces • clarify on-site parking adequacy for special events without relying on surrounding streets for overflow parking demand.
Noise	The Applicant's acoustic assessment does not: • estimate the number, type, or cumulative sound power levels of mechanical plant items expected within the rooftop plant area • adequately detail or assess the capacity of the rooftop plant enclosures' capacity for noise mitigation. <u>Council recommendation</u> • update the acoustic assessment to address plant enclosures, louvre performance and cumulative noise details.

Issues raised	Submission summary
Contamination	- the Preliminary Site Investigation (PSI) identifies 4 potential areas of concern and recommends that a Detailed Site Investigation (DSI) be undertaken and if contamination is confirmed, a Remediation Action Plan (RAP) be prepared. <u>Council recommendation</u> - a DSI and RAP (if required) should be submitted prior to determination, to ensure the site can be made suitable for its intended educational use.
Lighting	- the SIP building's height, together with proposed vegetation removal may increase light spill to Avon Road residences - consideration should be given to potential impact of internal lighting to surrounding residences and design treatment mitigation measures should be considered. <u>Council recommendation</u> - ensure all lighting complies with AS/NZS 4282:2019 - incorporate design measures to minimise light spill and protect residential amenity.

5.1.4 Summary of public submissions

71. The Department received two submissions from individuals and two from utility providers during exhibition of the EIS. The two public submissions were both objections, the two from utility providers were comments.
72. A summary of the issues raised in the two public submissions from individuals is provided in **Table 9** and a link to submissions is provided in **Appendix C**.

Table 9 | Issues raised in public submissions from individuals

Issue	Summary
Irreversible loss of mature trees and biodiversity	• the irreversible loss of mature trees and biodiversity, including removal of Blue Gum trees associated with BGHF, a critically endangered ecological community is concerning • the Applicant's assessment shows there are Blue Gums and Spotted Gums, some with more than 1m diameter proposed for removal • rooftop planting is inadequate compensation for loss of ecological value, established canopy cover and ecological function • Council's DCP protects trees and mandates replacement plantings.
Bulk and scale	• the 6-storey scale of the proposed building is out of character with the surrounding area and sets a precedent within the low-density neighbourhood • the project will lead to visual intrusion and normalisation of high-rise development.
Construction impacts	• construction will result in dust and noise, and early-morning truck movements and traffic disruption will result in adverse impacts on air quality and residents' health • while a CTMP is anticipated, past experience suggests that such plans may not adequately mitigate the profound impact on daily life.
Alternative options	• alternative, more sustainable options should be explored to meet school needs, such as multi-campus models or adaptive reuse of existing buildings, rather than intensifying development on a single site within a residential area.

73. A summary of the utility providers' submissions is provided in **Table 10**.

Table 10 | Summary of utility providers' submissions

Utility Provider	Submission summary
Sydney Water	Sydney Water advised: • a preliminary assessment of the project indicates that water and wastewater servicing should be available for the proposed development • amplifications, adjustments, deviations and/or minor extensions may be required • detailed requirements will be provided at the Section 73 application stage. Recommended conditions to address Section 73 Compliance Certificate and Building Plan Approval requirements were provided.
Ausgrid	Ausgrid advised: • existing Ausgrid underground electricity cables are in the vicinity of the site, construction must avoid impacts to these assets and existing Ausgrid easements and access arrangements must be maintained • development near the Ausgrid kiosk substation must meet minimum separation distances, fire resistance, ventilation, and blast protection requirements • all underground services are to be located, and depths confirmed prior to excavation, including through BYDA and any works affecting ground levels above Ausgrid cables require prior written approval • ground anchors must not be installed within 300mm of, or pass over, underground cables • works near electricity infrastructure must comply with Ausgrid network standards, SafeWork excavation requirements, and relevant Australian Standards • ongoing consultation with Ausgrid is required for any new or modified electricity connections, including submission of a connection application.

5.2 Response to submissions

74. Following the public exhibition period, the Department asked the Applicant to respond to the issues raised in submissions and the advice received from government agencies. The Department also requested the Applicant respond to key issues raised by the Department including:
- biodiversity
 - built form and urban design
 - parking
 - cumulative impact assessment
 - National Construction Code (NCC) Compliance
 - description of the development site.
75. The Applicant provided a submissions report (RtS) to the Department on 5 January 2026 (**Appendix B**). The RtS included:
- an architectural RtS response report
 - an updated landscape design report and RtS response
 - an updated AIA, BDAR and VMP
 - a VIA addendum
 - an updated TIA
 - an updated (CTMP)
 - an updated water management plan
 - a flood response statement
 - an updated acoustic assessment
 - an updated ACHAR
 - a fire engineering review
 - a structural engineering statement.
76. The Department published the RtS on the NSW Planning Portal and sent to relevant government agencies and Council for comment on 12 January 2026.
77. Council reviewed the Applicant's RtS response and maintained its objection to the project. A summary of the key issues raised by Council is below:

Urban design

- the western front corner of the SIP building would be setback approximately 40m from Avon Road, which is consistent with the setback of the existing Science Building that is highly visible from Avon Road
- the visual impact of the project should not rely on vegetation for screening
- concerns remain regarding the lack of articulation or modulation of the northern facade to reduce visual bulk of the 6-storey building when viewed from Avon Road and adjacent residential dwellings.

Biodiversity

- trees could be retained through redesign of the SIP building, and 4 alternative building location scenarios provided by the Applicant were not a sufficient avoidance and minimisation analysis as the Applicant did not investigate other areas of the school campus for a new SIP
- the Applicant's RtS response that hydrological and soil profiles within the retained BGHF would remain unaltered was not supported by a referenced study or a discussion of potential hydrological impacts on the adjoining BGHF to the north.

5.3 Request for further information (RFI)

78. On 13 January 2026, the Department issued an RFI requesting the Applicant provide further information to address potential on-street construction worker parking demand by providing an on-street parking survey during and outside of school operation periods. The Applicant responded on 20 February 2026, providing on-street parking survey results from:
- before school term on 27 January 2026
 - during school term on 3 February 2026.
79. On 11 February 2026, the Department issued an RFI requesting the Applicant address Council's RtS advice. On 5 March 2026, the Applicant provided an Architectural RFI Response, updated VMP, Hydrological and Soil Profile Response, and the following justification:

Urban design

- that the SIP building's setback (minimum 40m) is not comparable to the existing Science Building, as the majority of the Science Building is set back 20m and is located where vegetation within the school site along Avon Road is less dense, and its eastern most edge is set back 40m and is not visible from Avon Road

- the portion of the Science Building shown in Council’s submission is also not screened by the dense trees, unlike the proposed SIP building would be
- that visibility of the SIP from Avon Road would be influenced by a combination of factors, including the 40m to 70m setback, approximately 70m to 100m separation to dwellings on Avon Road, depth of the BGHF/trees and oblique viewing angles from the public domain
- that the retained BGHF corridor forms part of the established landscape setting of the site rather than a mitigation measure relied upon to reduce visual impact
- the articulation of the northern facade, including its division into distinct vertical elements, use of glazing to break up built form, continuous horizontal sunshades and detailed brickwork would soften perceived bulk.

Biodiversity

- additional alternative building heights, configurations and on-site locations considered are unviable due to increased visual impact, campus fragmentation, and encroachment on adjacent BGHF
- soil profiles within the retained BGHF would remain unaltered as demonstrated by the Hydrological and Soil Profile Response.

80. On 19 March 2026, the Department issued a further RFI requesting the Applicant provide additional aerial or oblique (drone-style) visualisations of the proposed SIP building from a range of viewpoints, including from Avon Road (west to east) and other vantage points to inform the Department’s assessment of bulk and scale and visual impact. On 14 April 2026 the Applicant provided two indicative aerial visualisations at oblique views looking north-east towards the proposed SIP building, including proposed trees adjoining the SIP building grown to approximately 30m and 50m (mature) in height (**Figure 38** and **Figure 39**).

6 Assessment

82. The Department considered the Applicant's EIS, RtS, RFIs, and the issues raised by Council, government agencies and public submissions in the assessment of the project. The Department considers the key issues associated with the proposal are:

- built form and urban design
- biodiversity
- traffic and parking.

83. These issues are discussed below, other issues considered are discussed at **Section 6.4**.

6.1 Built form and urban design

6.1.1 Building design and project layout

84. The project includes the demolition of 4 existing senior school buildings, the Robert Vicars Building, Dorothy Knox Building, Jack Vicars Building, and Isabel McKinney Harrison Centre, which the Applicant states are at the end of their operational life. Construction includes excavation for a basement level, construction of the new part 4, part 6-storey SIP building, interface works to adjoining retained buildings, landscaping, and delivery of the Campus Commons.

85. The application was supported by an Architectural Design Report (ADR).

86. The project was reviewed by the NSW Government Architect (GANSW) through the State Design Review Panel (SDRP) process. GANSW raised no concerns with the project's design, bulk and scale at its EIS submission stage.

87. The SIP building would provide general learning spaces, senior student facilities, staff areas, a 327-seat retractable auditorium, robotics workshop, dining hall, design and technology workshop, food and beverage facilities, amenities, storage and building services.

88. The SIP building would be in the northwest portion of the development site between the service road to the northwest and the main oval to the southeast (**Figure 24**).

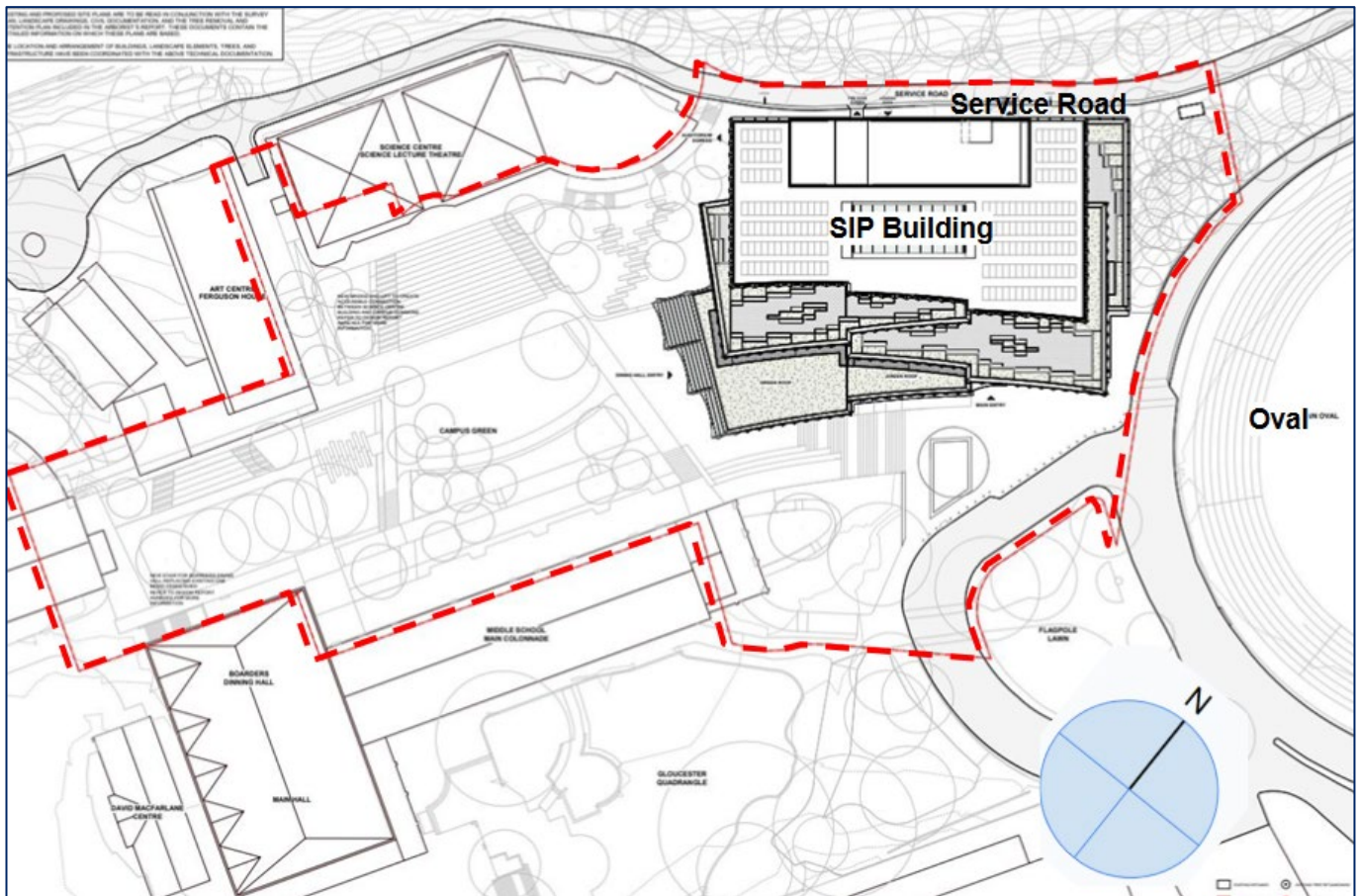


Figure 24 | SIP – Site Plan (Base source: Applicant’s EIS 2025)

89. The western corner of the SIP building would be set back approximately 40m from the northwest boundary (Avon Road frontage), with most of the building set back greater than 40m. The nearest residential dwellings on the western side of Avon Road are approximately 70m to 100m from the SIP building (**Figure 25**).

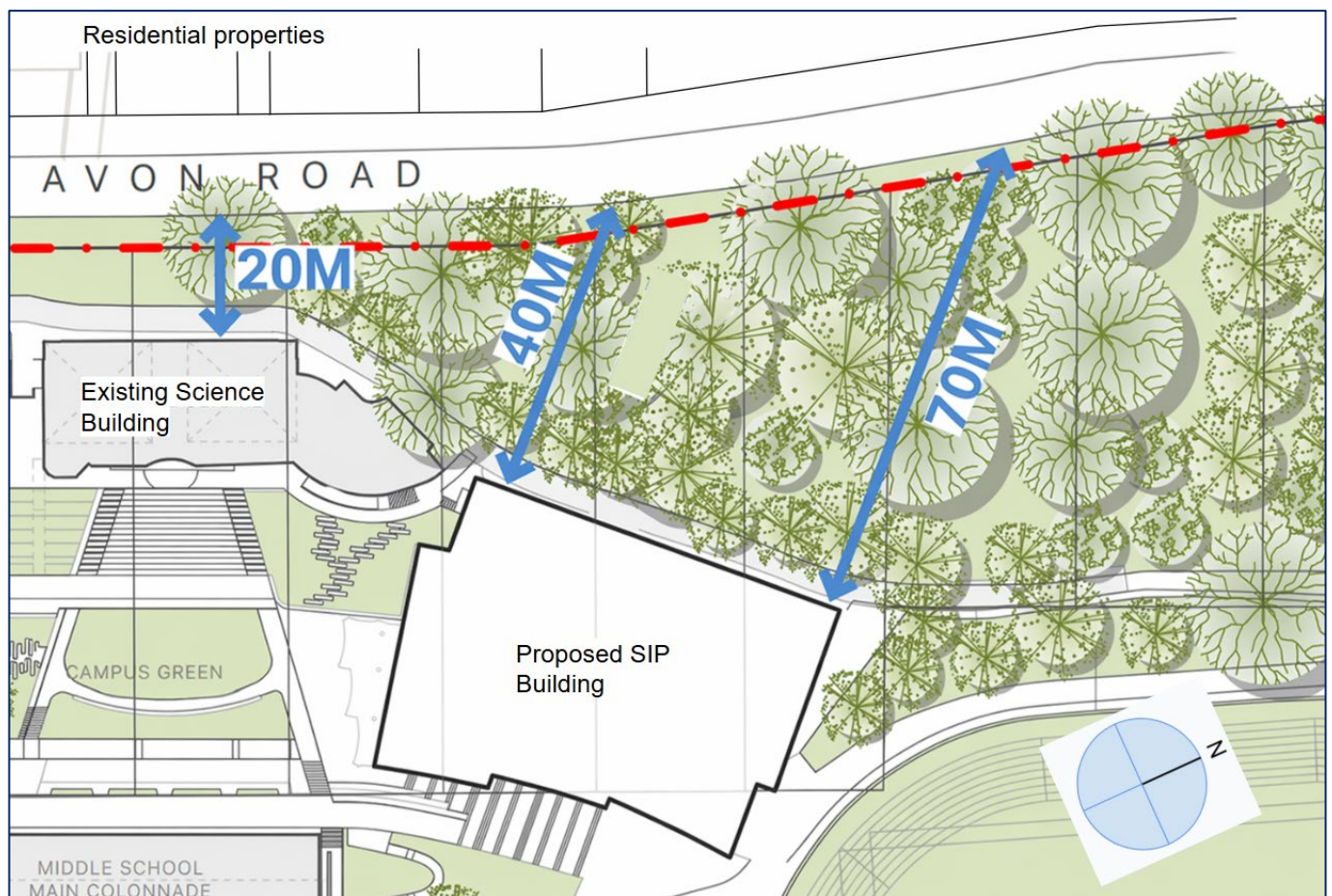


Figure 25 | Proposed SIP and existing Science Building setbacks (Base source: Applicant's EIS 2025)

90. The site falls approximately 9m from southeast to northwest (downwards to Avon Road). The design of the SIP building steps down the slope, presenting 3 to 4-storeys on the building entrance side to the south, and a taller 6-storey facade to the north adjacent to the adjoining service road and vegetated area containing BGHF, adjacent to Avon Road. The building's total height to the top of the roof plant enclosure is 29.68m (**Figure 26**).
91. The building facades would be curved brick faced vertical panels, recessed glazing and continuous horizontal sunshades. The principal materials would include curved brick rainscreen cladding, bronze toned aluminium shrouds and fascia elements, glazing and aluminium spandrel panels (**Figure 27**).
92. The roof would include photovoltaic panels and 2 screened plant enclosures, with lower level terraced/roof areas containing green roofs and plantings (**Figure 28**).

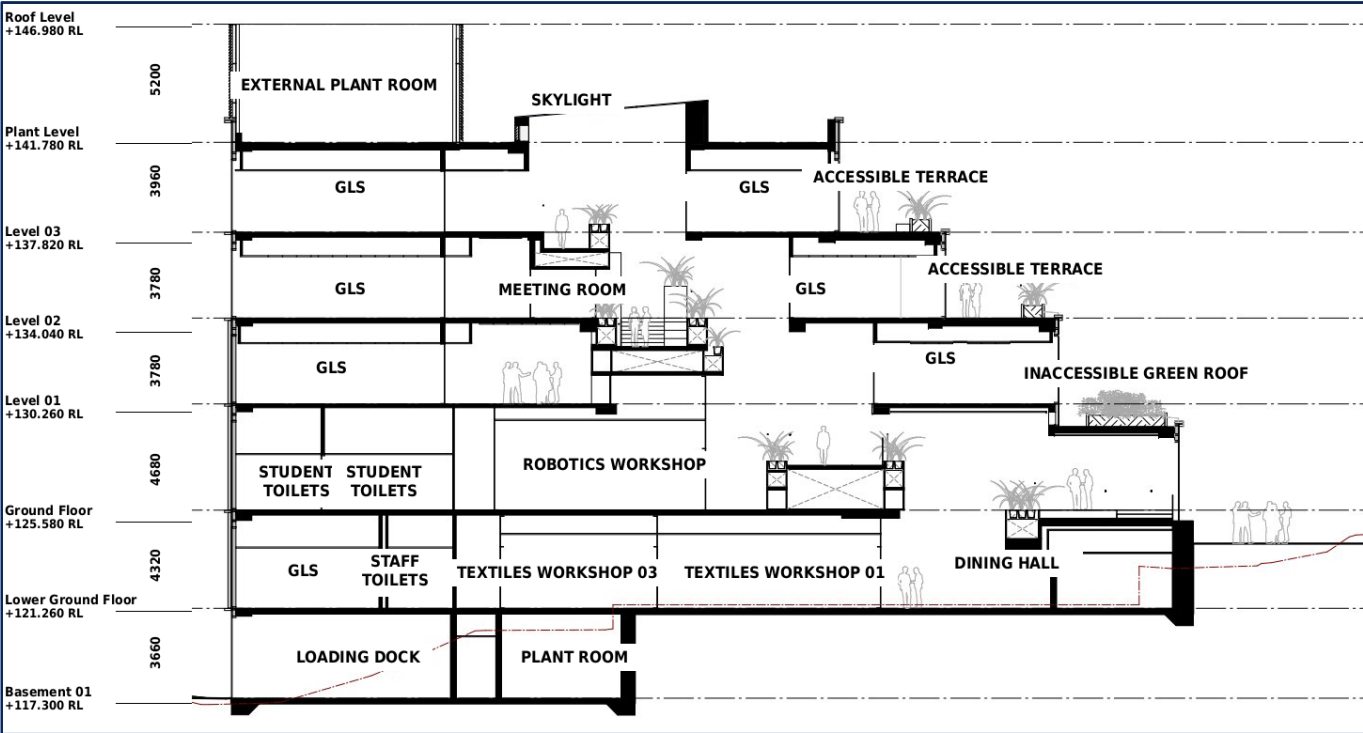


Figure 26 | North-south elevation (Source: Applicant’s EIS 2025)

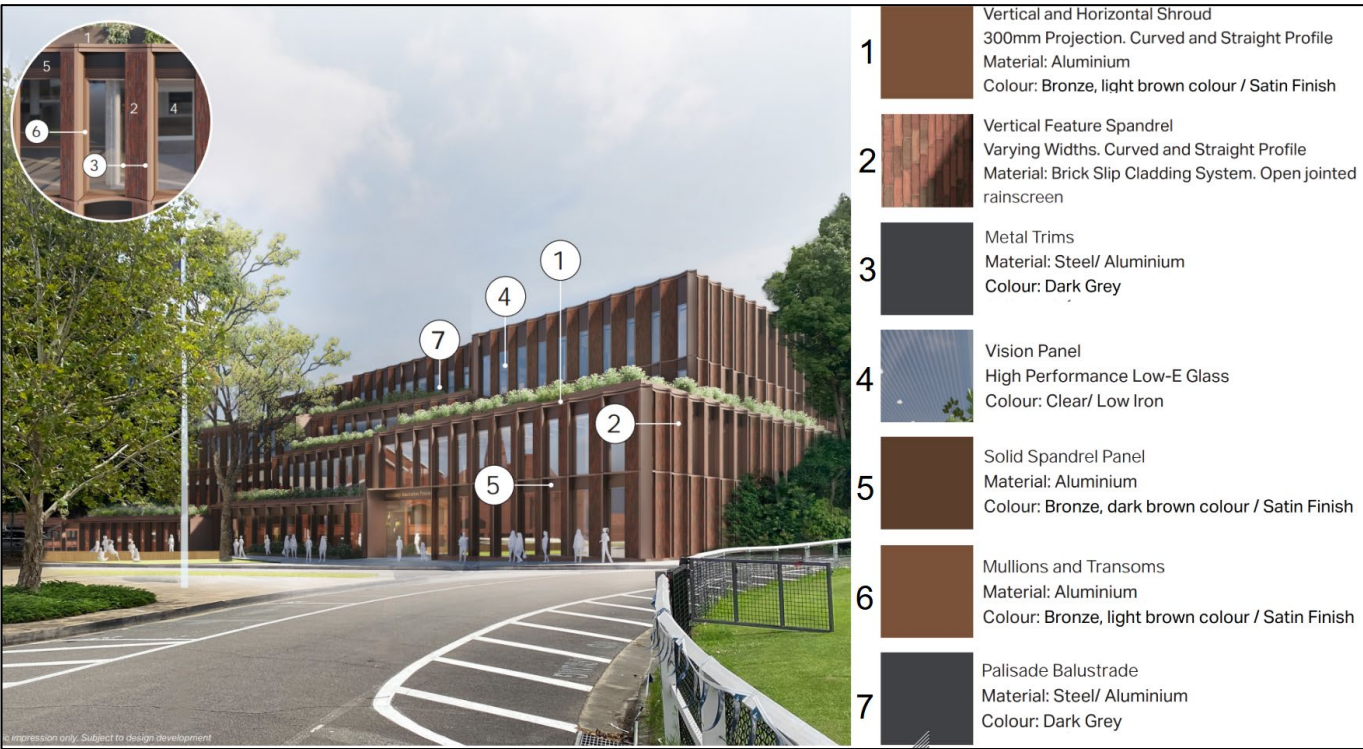


Figure 27 | Proposed SIP building colours and materials schedule (Source: Applicant’s EIS 2025)

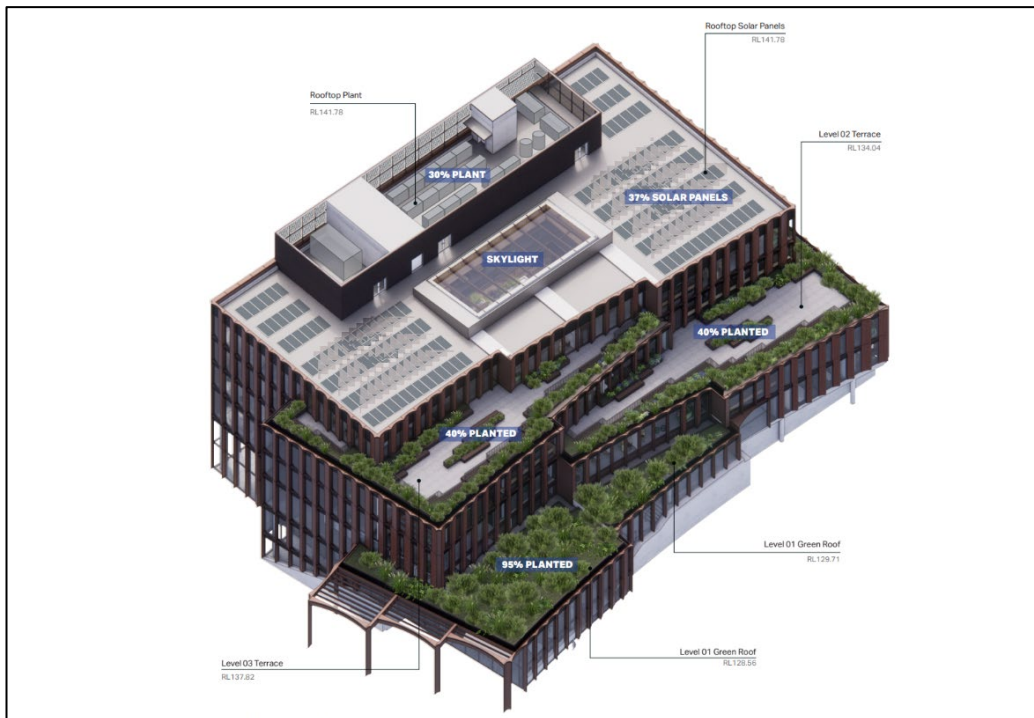


Figure 28 | 3D perspective of the proposed SIP building showing roof and terraced areas (Source: Applicant's EIS 2025)

93. The Campus Commons is proposed as a new central landscaped open space created by the demolition of the existing school buildings. It would sit between the proposed SIP building, and the existing Science Centre, Colonnade building and Ferguson House. It would function as an outdoor gathering, learning, and landscaped space. It includes lawn, amphitheatre seating, landscaped paths and terrace planting, and would facilitate pedestrian movement between the SIP building and the broader school campus (**Figure 29** and **Figure 30**).

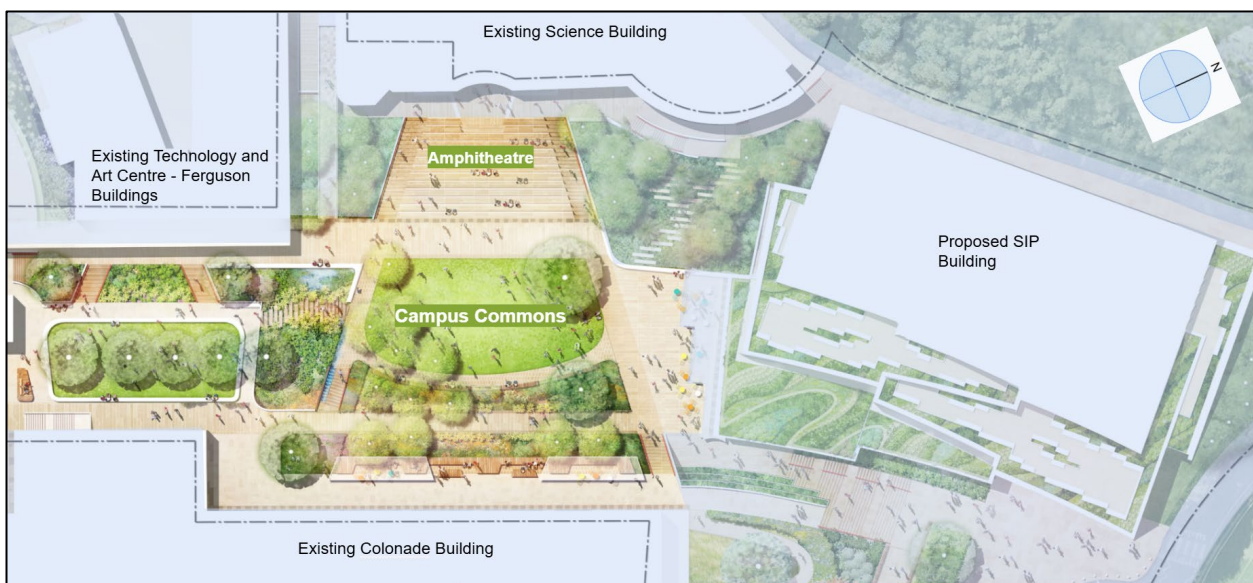


Figure 29 | Proposed Campus Commons (Base source: Applicant's EIS 2025)



Figure 30 | Indicative render of the proposed Campus Commons (Source: Applicant's EIS 2025)

6.1.2 Bulk and scale and visual impact

94. The SIP building would be part 4 and part 6-storeys above ground. When view internally toward the eastern elevation the building would present as 4 storeys, and when viewed from the west, from the western boundary of the site, it would present as 6 storey. The building would comprise Basement 01, Ground to Level 03, and a roof/plant level. **Table 11** sets out reduced levels (RLs) and proposed uses across each level. The Gross Floor Area (GFA) for each level is provided in **Table 12**.

Table 11 | SIP Building - levels and uses

Level	Reduced Level (m AHD)	Proposed uses
Basement 01	117.300	Auditorium teaching space with 327 retractable seats, loading dock, plant room.

Level	Reduced Level (m AHD)	Proposed uses
Lower Ground Floor	121.260	School canteen and open atrium (400 seats), textiles hub, food technology hub, staff rooms and school kitchen.
Ground Floor	125.580	Main entry, administration rooms, robotic and digital workshop labs.
Level 01	130.260	12 general learning spaces (GLS), staff room, 2 terrace covered outdoor learning areas (COLAs) and informal learning areas within the atrium.
Level 02	134.040	8 GLS, senior study areas and staff rooms and a terrace COLA.
Level 03	137.820	11 GLS, staff rooms and an external terrace.
Roof	141.780	The roof and plant level would accommodate mechanical plant, rooftop PV panels, and an inaccessible green roof.
Plant (top of screening)	146.980	N/A.

Table 12 | SIP Building – Gross Floor Area (GFA) schedule

Level	GFA (m ²)
Basement 01	841.3
Lower Ground Floor	1,778.4
Ground Floor	1,837.3
Level 01	1,737.9
Level 02	1,422.2
Level 03	1,245.0
Total GFA	8,862.1

95. The relationship between building levels, the stepped massing, and the topography is shown in the section drawing in **Figure 30**. The section shows how the building steps down from north to south. On the northern side (facing the adjoining BGHF and Avon Road), building levels ground to Level 03 are above the service road level (directly adjoining the SIP building), with the basement and lower ground levels embedded in the slope. On the southern side (facing the SIP forecourt), the building reads as a lower form, stepping down toward the SIP forecourt.
96. The northern facade would face the adjoining BGHF and towards Avon Road. It would present a curtain wall system of 1,800 mm-wide unitised brick panels.
97. Shadow diagrams provided with the EIS show that due to the position and orientation of the SIP building along the northern boundary and the distance to adjoining residential land, there would be no overshadowing impacts on neighbouring properties.
98. The school campus is not subject to maximum building height (HOB) or floor space ratio (FSR) development controls under the KLEP 2015.
99. Public submissions received during exhibition of the project raised concerns regarding the bulk, scale and visual impact of the project, including that the 6-storey scale of the SIP building would be out of character with the surrounding low-density neighbourhood and could set a precedent for high-rise development in the residential are.
100. The Applicant's RtS included an Architectural RtS Response and VIA Addendum. In response to Council's visual impact concerns, the Applicant provided:
- additional visualisations based on surveyed and arborist verified tree data, modelling the location of the SIP building behind retained trees/vegetation from Avon Road (**Figure 31** and **Figure 32**)
 - drone imagery facing Avon Road from the service road (adjoining the proposed SIP building) at elevations of approximately 10m to 35m, illustrating vegetation density and screening (**Figure 33**, **Figure 34** and **Figure 35**)
 - a section to show the height of the tree canopy and SIP building, and likely viewpoints from a residence on Avon Road and the public domain (**Figure 36**)
 - clarification of vegetation removal, including identification that only retained vegetation within the BGHF corridor was provided in RtS visualisations
 - amendments to the colour of the roof plant enclosure louvre panels from dark grey to a lighter silver tone (**Figure 37**).

101. The Applicant concluded that visual impacts arising from the proposed SIP building when viewed from the public domain would be minimal. **Figure 31** to **38** are extracts from the Applicant's RtS and were provided to support this conclusion.
102. Two indicative aerial visualisations provided by the Applicant in response to the Department's RFI for additional visualisations are provided at **Figure 38** and **Figure 39**.



Figure 31 | Indicative visualisation from Avon Road, modelling the location of the SIP building behind retained trees/vegetation and the BGHF corridor (Source: Applicant's RtS 2026)



Figure 32 | Indicative visualisation looking north-east from Avon Road, modelling the location of the SIP building behind retained trees/vegetation and the BGHF corridor, and adjoining retained Science Building (Source: Applicant's RtS 2026)

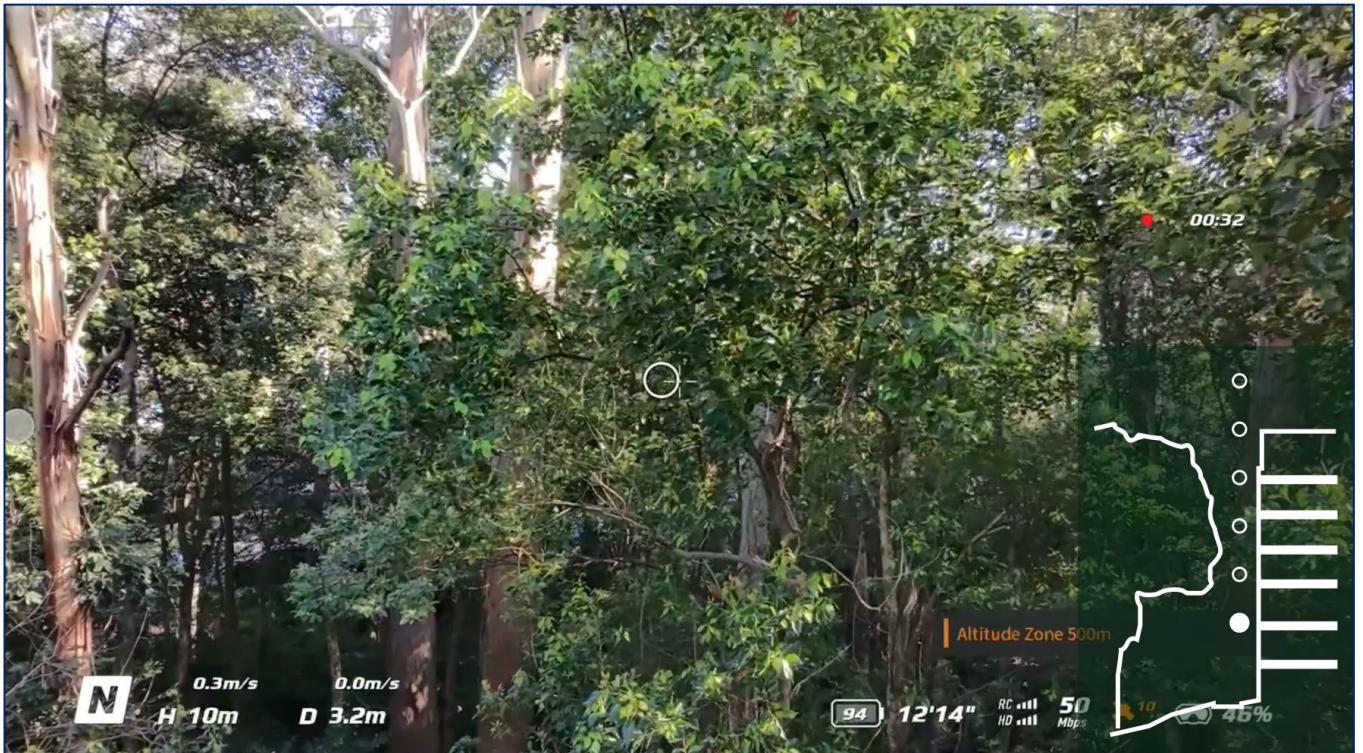


Figure 33 | 10m elevation drone images facing the BGHF corridor and Avon Road from the service road (adjoining the proposed SIP building), illustrating existing vegetation density and screening (Source: Applicant's RtS 2026)



Figure 34 | 20m elevation drone images facing the BGHF corridor and Avon Road from the service road (adjoining the proposed SIP building), illustrating existing vegetation density and screening (Source: Applicant's RtS 2026)



Figure 35 | 30m elevation drone images facing the BGHF corridor and Avon Road from the service road (adjoining the proposed SIP building), illustrating existing vegetation density and screening (Source: Applicant's RtS 2026)

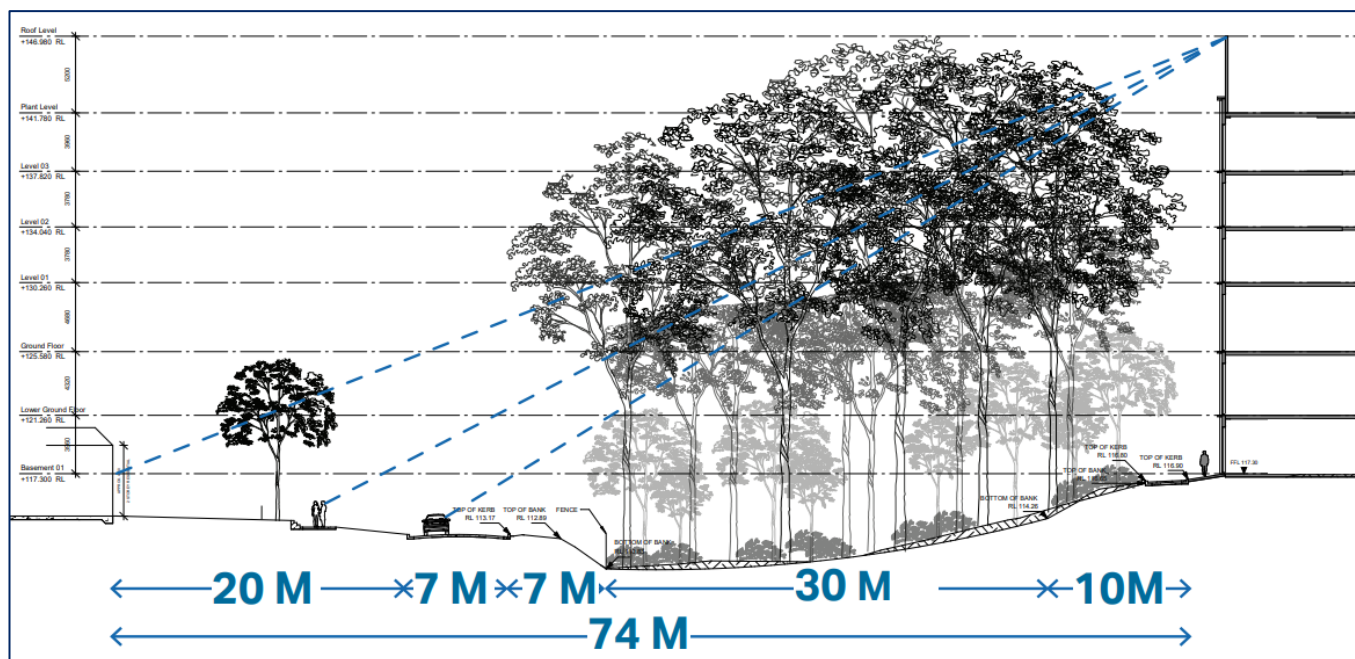


Figure 36 | North-south section showing the height of the tree canopy and the SIP building, and viewpoints towards the SIP building (Source: Applicant's RtS 2026)



Birds Eye View - Previous Proposed Colour Scheme

Solid Aluminium Vertical Louvres

Colour: Bronze, light brown colour / Satin Finish



Birds Eye View - Amended Colour Scheme

Solid Aluminium Vertical Louvres

Colour: Silver, light silver colour / Satin Finish

Figure 37 | EIS proposed and RtS amended colour to roof plant enclosure louvre panels (Source: Applicant's RtS 2026)



Figure 38 | Indicative aerial visualisation looking north-east towards the proposed SIP building, including proposed trees adjoining the SIP building grown to approximately 30m in height (Base source: Applicant's RFI response 2026)



Figure 39 | Indicative aerial visualisation looking north-east towards the proposed SIP building, including proposed trees adjoining the SIP building grown to approximate mature height (50m) (Base source: Applicant's RFI response 2026)

6.1.3 The Department's consideration and findings

103. The Department has assessed the proposed bulk and scale and visual impact of the SIP building in consideration of the Applicant's EIS, RtS and RFI responses, Council's EIS and RtS submissions, GANSW advice, public submissions, and the educational context of the site and its surrounding environment.
104. The Department acknowledges that the 6-storey northern facade would represent a change in scale relative to development within the R2 Low Density Residential zone on the western side of Avon Road. The Department also acknowledges Council's position that visual impact should not rely on vegetation for screening.
105. The Department is satisfied that the visualisations, drone imagery and section provided by the Applicant in the RtS and RFI responses demonstrate that retained vegetation would reasonably screen the SIP building from public domain viewpoints.
106. The Department further considers that the northern facade's varied materials and proportions would substantially break up the perceived bulk and scale of the 6-storey SIP building. Combined with the screening provided by the retained vegetation, the presentation of the building from the public domain would be acceptable.
107. The Department is satisfied that, on balance, the bulk and scale and visual impact of the SIP building are acceptable as the:
- SIP building would be set back a minimum of 40m from Avon Road, with most of the building set back greater than 40m, and 70m to 100m from the nearest residential dwellings on Avon Road
 - SIP building would step down with the topography of the site, presenting 3 to 4-storeys to the south (campus side) and 6-storeys to the north towards the existing service road, BGHF corridor and Avon Road
 - northern facade would be articulated through its vertical division into 3 components separated by glazed strips, continuous horizontal sunshades, and curved brickwork
 - roof plant enclosure has been amended from dark grey to a lighter silver tone in response to Council's advice, reducing visual bulk at the upper most level
 - SIP building's planted terraces and surrounding tree planting, together with the landscaped Campus Commons incorporating retained and new trees, would be consistent with the adjoining vegetated corridor and the wider landscaped setting of the school campus

- SIP building, although in part 6-storeys, would contribute to the established built form of the school campus, which is educational in character and already distinct in design and scale from the adjoining residential area
- land has no height or GFA limit under current SP2 zoning
- proposal is consistent with the SP2 zone objectives as discussed at Section 4.1 above, which seeks to facilitate infrastructure – in this instance school infrastructure.

108. The Department concludes that the bulk and scale and visual impact of the SIP building, including the 6-storey northern façade element, would be appropriate within the context of the school campus and residential context.

6.2 Biodiversity

109. The Department has considered the biodiversity impacts of the project against the *Biodiversity Conservation Act 2016* (BC Act), Biodiversity Assessment Method (BAM), and the project's SEARs. This includes consideration of the Applicant's revised BDAR, revised AIA, revised VMP and Landscape Design Report, public submissions, advice received from Council and CPHR and the Applicant's RtS and RFI response.

6.2.1 Existing biodiversity values

110. The development site is in an area of the campus comprising existing buildings, hardstand and access pathways and managed landscaping. The development site also contains a 0.19ha area of Blue Gum High Forest (BGHF) on its northern edge. BGHF is classified as Plant Community Type (PCT) 3136 and listed as a Critically Endangered Ecological Community (CEEC) under the *Biodiversity Conservation Act 2016* (BC Act).

111. BGHF is also identified as a Serious and Irreversible Impact (SAIL) entity under the BC Act. The 0.19ha of BGHF within the development site forms the southern edge of a larger BGHF area that extends outside the development site to the north and northeast forming a 40m to 70m wide corridor between Avon Road and the existing service road north of the development site (**Figure 40**).

112. The Applicant states that 171 BGHF trees located within the BGHF corridor adjoining the development site would be retained as part of the project (**Figure 40**).

113. The development site also contains approximately 0.36ha of exotic vegetation, comprising introduced and common planted species within landscaping, gardens and lawn, with some non-local native species also present.



Figure 40 | Blue Gum High Forest areas within and surrounding the development site (Base source: Applicant's EIS 2025)

6.2.2 Biodiversity impacts

114. The project would:

- clear 0.19ha of BGHF (PCT 3136) within the development site, with the BDAR classifying the trees as low to moderate integrity with a vegetation integrity score (VIS) of 28.2
- clear 0.36ha of exotic/non-native vegetation within the development site
- remove 127 trees within the development site (**Figure 41**), including:
 - 61 low retention priority trees
 - 56 medium retention priority trees
 - 10 high retention priority trees
- retain 8 trees within the development site

- retain the 40m to 70m wide BGHF corridor and all 171 BGHF community trees north of the development site (Figure 40).

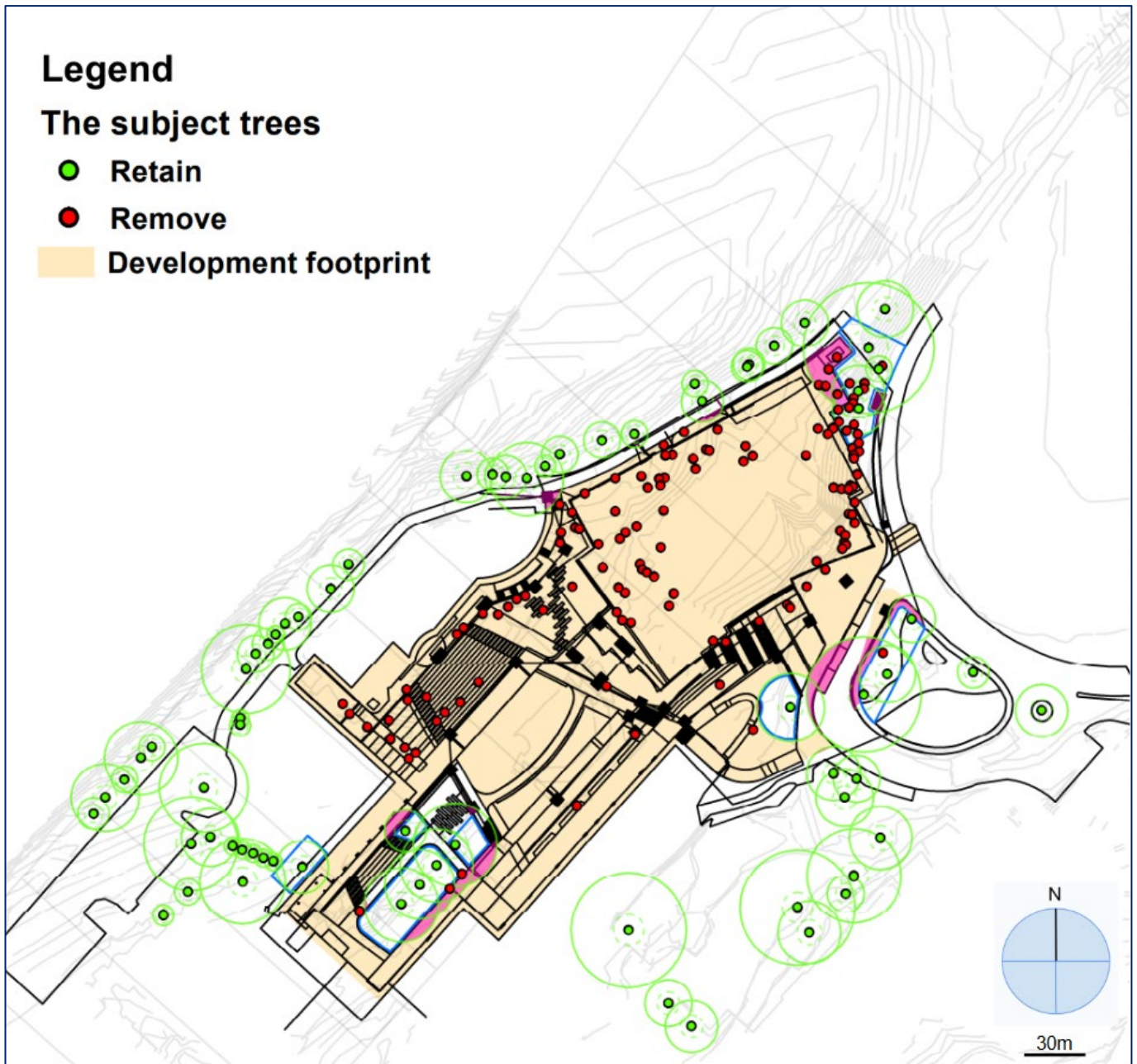


Figure 41 | Tree removal and retention plan (Base source: Applicant's EIS 2025)

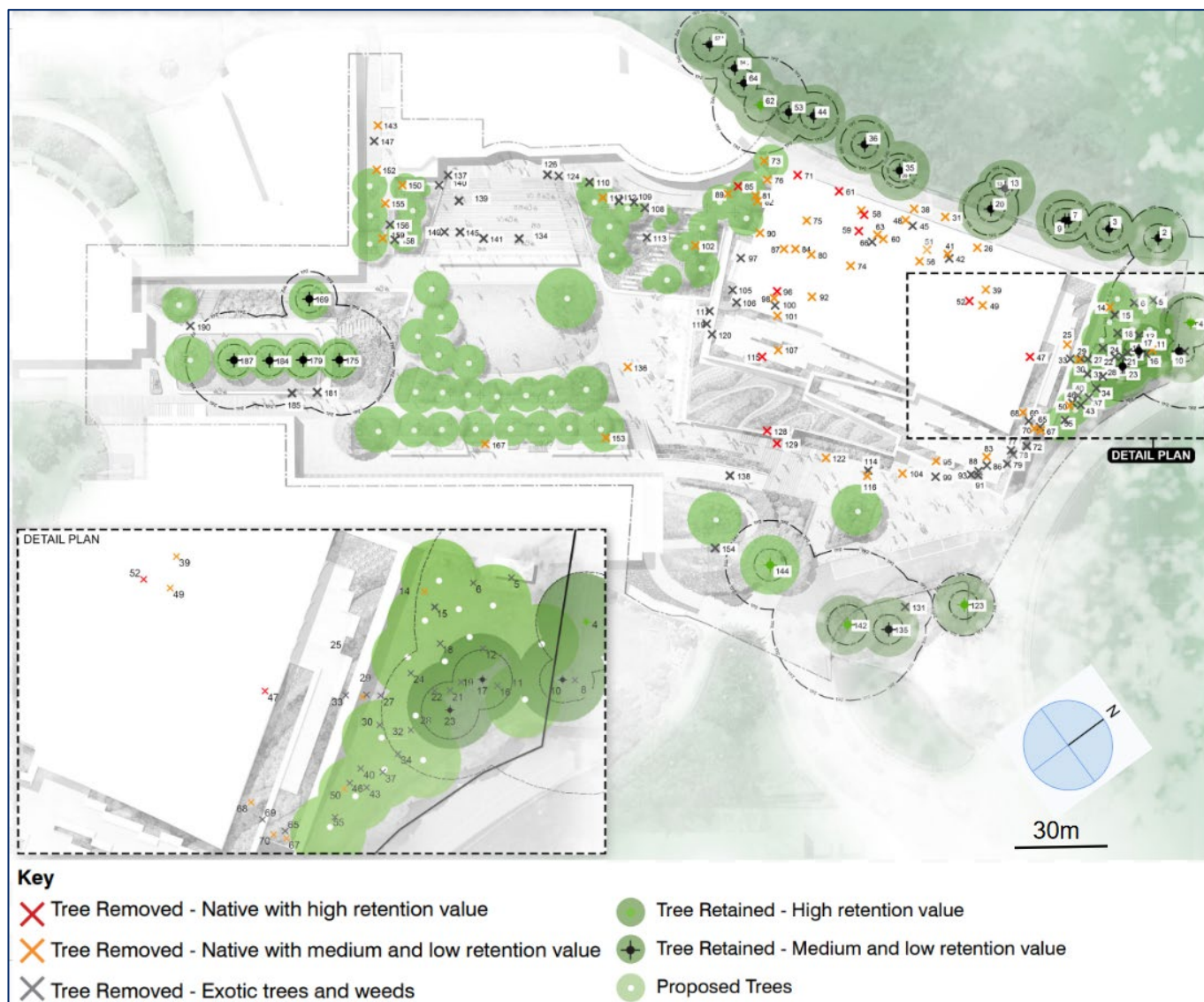


Figure 42 | Tree removal and retention, and tree value plan (Base source: Applicant's EIS 2025)

6.2.3 Mitigation and offsets

115. The Applicant proposes a combination of avoidance, mitigation, management and offset measures to address biodiversity impacts associated with proposed tree removal and demolition including:
- 61 replacement trees (and 26 tree ferns) within the development site including indigenous species associated with BGHF (**Figure 42** and **Figure 43**)
 - implementation of a 5-year VMP for the BGHF corridor, including 4,962 plantings across 2 management zones, weed control, monitoring, habitat installation and adaptive management (**Figure 44**)
 - pre-demolition microbat surveys, pre-clearing fauna surveys, ecologist supervision, fauna relocation, and reuse of habitat features from felled trees

- tree protection fencing, erosion and sediment controls, and arborist supervision of works within the Tree Protection Zones (TPZ) of retained trees
- retirement of 3 ecosystem credits for PCT 3136 through the Biodiversity Offsets Scheme.



Figure 43 | Tree location plan (SIP) (Base source: Applicant's EIS 2025)

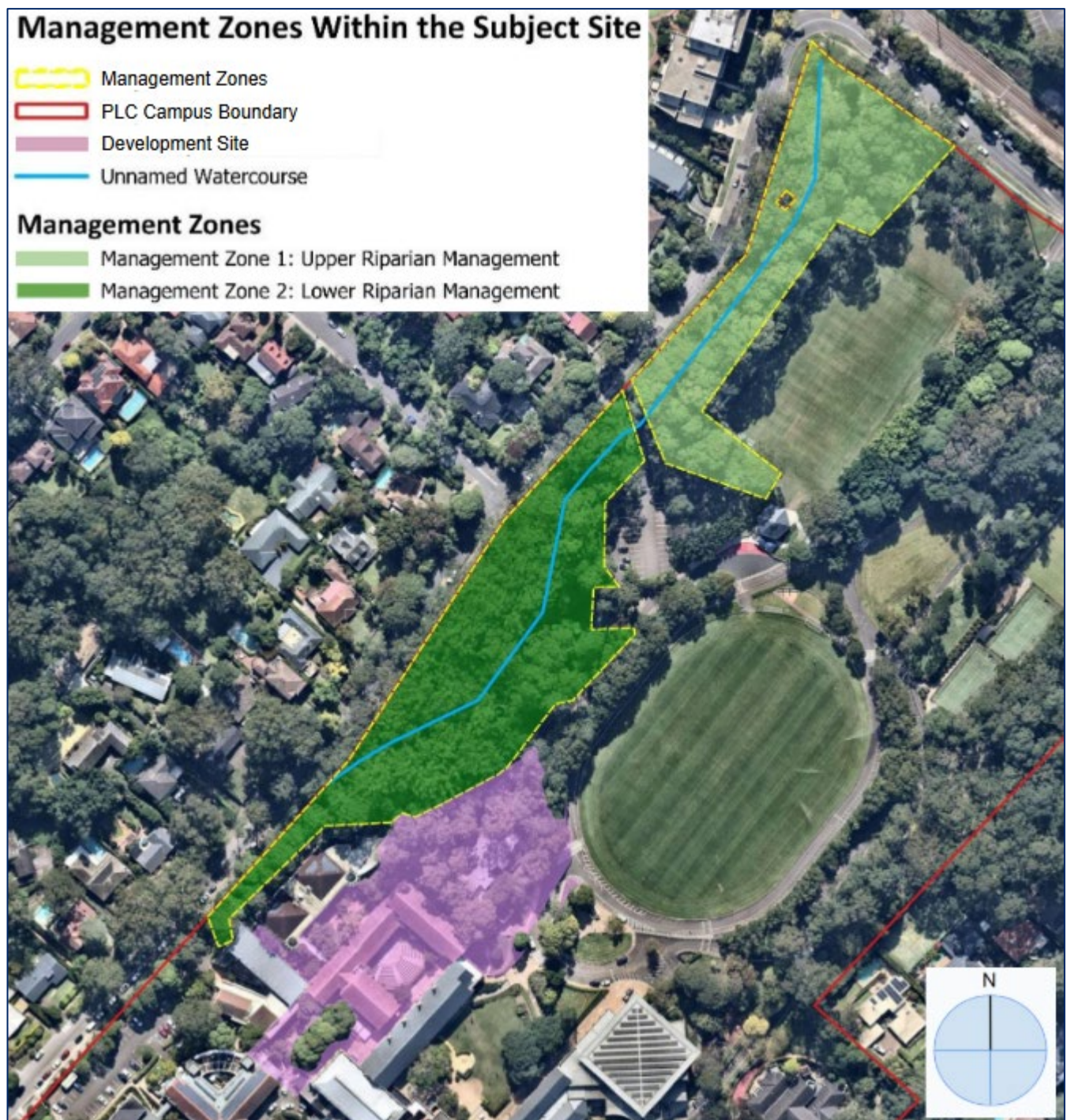


Figure 44 | Vegetation Management Plan zones (Base Source: Applicant's EIS 2025)

116. The Vegetation Management Plan (VMP) includes 2 management zones covering a 1.84ha area of BGHF (Core Riparian Zone as defined under the Ku-ring-gai DCP) north of the development site. The Applicant has identified the VMP as a supporting mitigation on the basis that the development site has limited capacity for additional plantings, and that targeted works within the BGHF corridor would deliver measurable ecological gains to offset the impacts of the project on the BGHF edge within the development site. The VMP provides performance criteria, including a 90% reduction in priority weeds, 80% reduction in

weed cover, and a 90% survival rate for new plantings by Year 5, with annual monitoring reports and management responses if targets are not being met. While formal monitoring is proposed for 5 years, management of the 2 zones would extend for the life of the school to ensure the long-term health of the BGHF corridor.

6.2.4 Biodiversity issues raised in agency advice and submissions

117. Council's objection and CPHR's advice on the EIS included issues related to tree loss, impacts on retained trees, and associated loss of biodiversity; and that the EIS did not provide information to demonstrate that impacts to the BGHF had been avoided and minimised in accordance with the BAM, including consideration of reasonable and feasible alternatives. Public submissions also raised concerns regarding tree removal and impacts to the adjoining BGHF.
118. After exhibition of the EIS, the Department requested the Applicant respond to issues raised by government agencies, and submissions from Council and the public (see **Section 5.1**). The Department also issued a Key Issues Letter requiring the Applicant to demonstrate how impacts to BGHF had been avoided and minimised in accordance with the BAM, including consideration of reasonable and feasible alternatives, and to address the retention of significant trees identified by Council and CPHR through revised design and increased SIP building setbacks. The Applicant's RtS response and RFI response are provided in **Section 5.2** and **5.3** and an assessment of the Applicant's information is below.

6.2.4.1 Avoidance and minimisation under the BAM

119. The Applicant's RtS included avoidance and minimisation analysis, set out in the revised BDAR and supported by drawings and design analysis in an Architectural RtS response. The analysis:
 - assessed 4 alternative building locations (studies 1 to 4), set out in Section 6.1.2 of the revised BDAR and supported by the Architectural RtS Response
 - considered a reduced building footprint, set out in Section 6.1.3 of the revised BDAR
 - considered redesigning the building within its current location to retain the high retention value trees identified by CPHR and Council (T61, T71, T85, T102, T128 and T129), set out in the Applicant's Architectural RtS response.
120. The Applicant concluded none of the 4 alternative building location scenarios were viable. The scenarios, and the reasons for their rejection by the Applicant, are summarised below:

- Study 1: Shift Northeast - would encroach on the main sports oval, impact the Gate 1 ring road, require removal of additional mature trees (including T4, T10 and T23), and require increased excavation (**Figure 45**)
- Study 2: Shift South - would impact the Gate 1 ring road, encroach on the heritage listed Colonnade Building and Flagpole Lawn, intrude into the TPZs of T61 and T71, and require increased excavation to retain access to the loading dock (**Figure 46**)
- Study 3: Shift Southeast - would encroach on the main sports oval, impact the Gate 1 ring road, require deeper excavation due to slope constraints, and conflict with existing drainage and service alignments (**Figure 47**)
- Study 4: Locate on existing demolition footprints - would impact the Colonnade Building and Science Building, prevent delivery of the planned Campus Commons, and result in an over height building due to existing site levels (**Figure 48**).

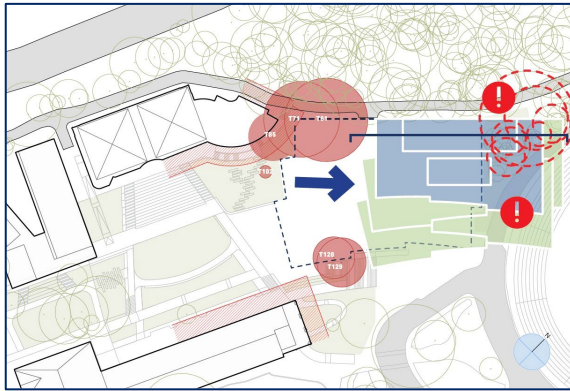


Figure 45 | Study 1 - shift northeast (Base source: Applicant's RtS 2026)

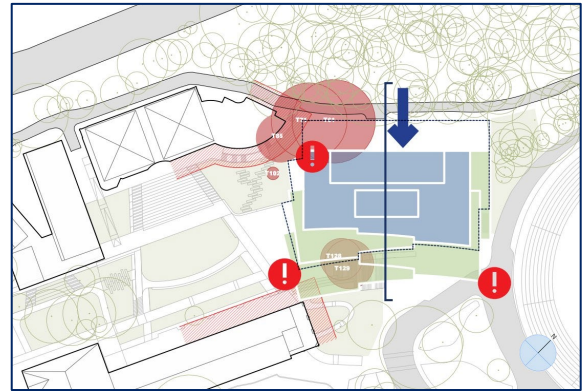


Figure 46 | Study 2 - shift south (Base source: Applicant's RtS 2026)

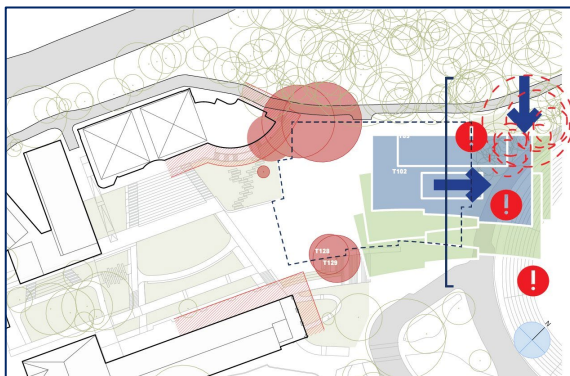


Figure 47 | Study 3 - shift southeast (Base source: Applicant's RtS 2026)

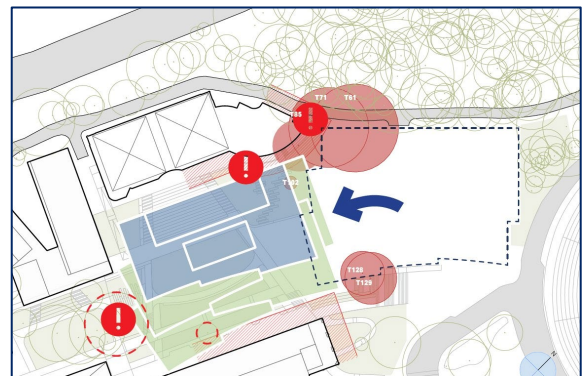


Figure 48 | Study 4 - locate on existing demolition footprints (Base source: Applicant's RtS 2026)

121. The revised BDAR also considered a reduced building footprint. This was rejected by the Applicant on the basis that a smaller building would not provide adequate space to

consolidate planned educational programs into a single facility and would require additional smaller buildings elsewhere on campus, increasing total site disturbance.

122. The Architectural RtS response considered whether the building could be redesigned within its current location to retain Trees T61, T71, T85, T102, T128 and T129. The analysis concluded that retention of these trees would require significant building redesign, including up to an approximate 38% reduction in GFA, and consequential impacts on the auditorium, circulation and fire safety provisions.
123. CPHR RtS advice advised that previously raised biodiversity matters had been adequately addressed, and recommended retirement of biodiversity credits, implementation of mitigation measures outlined in the revised BDAR, and AIA recommended tree protections measures be included in the consent.
124. Council RtS advice maintained their objection to the project (see **Section 5.2**).
125. In consideration of Council's RtS advice, the Department issued an RFI requesting the Applicant respond to Council's remaining issues.
126. The Applicant provided a revised Architectural response with additional studies (studies 5 to 7 below), concluding the additional study scenarios were also not viable. The additional scenarios, and the reasons for their rejection by the Applicant, are summarised below:
 - Study 5: Increase building height - would require an increase in overall building height to recover lost floor area, result in increased visual impact on neighbouring properties along Avon Road, and require removal of the proposed green roof and external planted terraces (**Figure 49**)
 - Study 6: Split the Project across multiple buildings - would result in renewed campus fragmentation, increased cumulative visual bulk, reduced landscape and biodiversity outcomes, and require additional access paths and greater building and general infrastructure modifications across the campus (**Figure 50**)
 - Study 7: Displace the building elsewhere - 4 alternative campus locations (Western, Central, North/South of the existing senior school, and Eastern) studied with each found to be unviable due to constraints including encroachment on the adjacent Turpentine-Ironbark Forest and BGHF, demolition of essential campus wide facilities (including the library and boarding halls), reduced amenity to surrounding buildings, and loss of student open space (**Figure 51**).

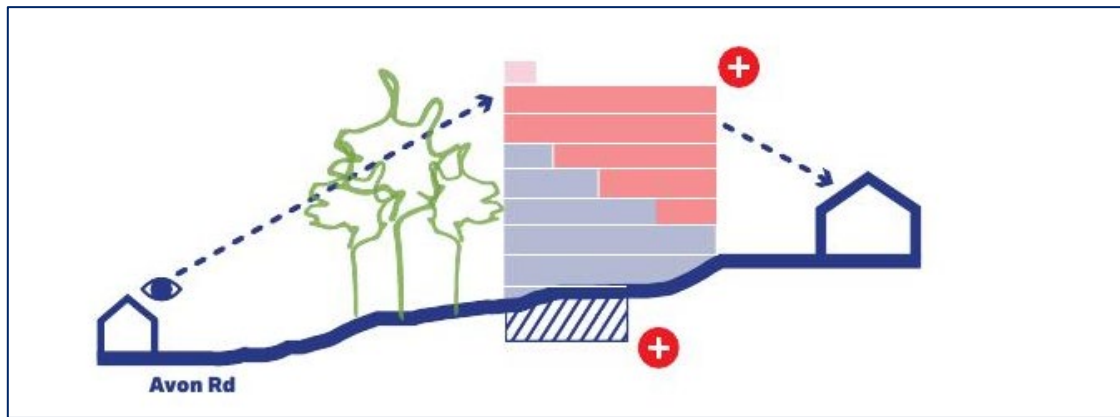


Figure 49 | Study 5 - increase building height (Source: Applicant's RFI response 2026)

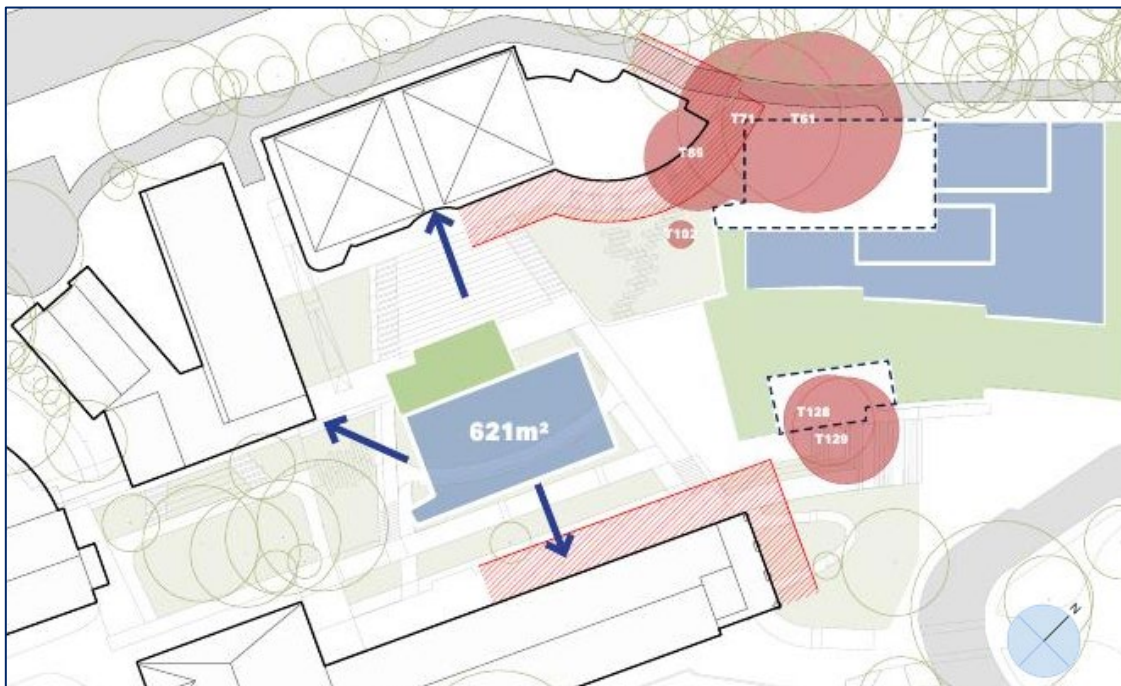


Figure 50 | Study 6 – split the project across multiple buildings (Base source: Applicant's RFI response 2026)



Figure 51 | Study 7 – displacement of the SIP building elsewhere on site, with four potential options (as numbered) (Base source: Applicant’s RFI response 2026)

127. The Applicant provided a hydrological and soil profile response which advised the development site sits on a local high point, with runoff directed away from the development towards a drainage depression. An on-site stormwater detention tank will limit post-development discharge volumes and velocities to pre-development levels. The response advised that the retained BGHF occupies a separate, intact soil profile separated from the development site by a service road, with basement excavation confined to the SIP building footprint, and subsurface flows to the adjoining BGHF root zone would not be intercepted.
128. The response acknowledged edge effects as a cumulative threat but noted the development site is already bordered by educational infrastructure, the BGHF area to perimeter ratio within 500m changes by only 2.38%, and the VMP includes measures for hydrological buffering, erosion control, weed suppression, enrichment planting, and edge monitoring.

6.2.4.2 Serious and Irreversible Impact (SII) assessment

129. The revised BDAR updated the SII assessment to address tree loss impacts as CPHR and Council noted that the BGHF is a SII entity under the BC Act. The assessment was updated with site-specific evidence regarding vegetation condition, fragmentation, avoidance, resilience and cumulative impacts, in accordance with section 9.1 of the BAM.
130. The assessment found that the impact to the BGHF is restricted to the edge of a ‘disturbed patch’, which the BDAR described as being vegetation that has regrown on land previously

modified by human activity (in this case former hardstand and ageing campus infrastructure on a site continuously occupied by the school since 1917).

131. The BDAR attributed the patch's condition to historical disturbance, including soil compaction, weed invasion and limited native regeneration, with an allocated VIS of 28.2 (low to moderate). The BDAR compared this with the adjoining 40m to 70m wide BGHF corridor along Avon Road, which it identified as supporting higher vegetation integrity with intact canopy, and which would not be impacted by the project.
132. The BDAR found that given the existing developed nature of the campus, the project and resulting loss of BGHF trees would not significantly increase landscape fragmentation or reduce ecological connectivity between existing patches of BGHF. The core BGHF corridor north of the development site would remain structurally continuous before and after proposed works.
133. The SAI assessment concluded that the change in fragmentation and ecological impact would be minor. CPHR confirmed that the RtS adequately addressed its concerns.

6.2.4.3 Retention of Trees T123, T142, T169, T175 and T180

134. The Applicant updated the AIA and Landscape RtS response to demonstrate viable retention of these trees through proposed tree sensitive construction methods, including maintenance or building up of soil levels within the Structural Root Zone (SRZ), use of tree collars where existing tree base is below proposed reduced level, use of free-draining aggregate, manual removal of existing structures within TPZs, and arborist supervision of all works.
135. The revised AIA downgraded the classification for the 5 trees from 'major' to 'moderate' in accordance with Australian Standard AS 4970-2025 *Tree Protection on Development Sites*.
136. Council and CPHR both accepted that the updated information adequately addressed their concerns regarding tree retention.
137. The Department is satisfied that the information provided by the Applicant shows that the proposed retention measures would be appropriate to ensure viable retention of the trees.
138. Conditions are recommended requiring implementation of the proposed tree protection measures and required arborist certification.

6.2.4.4 Fauna impact mitigation

139. The revised BDAR was updated to include additional pre-construction and construction phase mitigation measures, including pre-demolition microbat surveys, pre-clearing fauna

surveys, ecologist supervision, soft-felling of habitat trees, and fauna relocation under licence. The VMP was updated to require installation of microbat nest-boxes prior to tree removal and demolition, and relocation of logs from felled trees into the 2 VMP management zones.

140. CPHR raised fauna mitigation issues at the EIS stage and accepted the Applicant's response without further comment.

6.2.4.5 Landscape plan details and Vegetation Management Plan

141. The Applicant updated the landscape plans and provided a Landscape RtS response to clarify the locations, quantities and species of all proposed planting and trees, improve graphic clarity, remove weed species from the retention list, and confirm adequate deep soil areas.
142. The VMP was also updated to include a detailed planting schedule totalling 4,962 plants (453 canopy, 905 mid-storey, 3,604 ground layer) across management zones 1 and 2, all species characteristic of PCT 3136 BGHF, along with identification of primary and secondary weeds with a staged removal methodology, edge effect management measures, and a 5-year formal monitoring program.
143. Council's RtS advice accepted that the updated landscape plans adequately addressed its concerns. However, Council raised that the VMP's 5 year monitoring period, while exceeding the minimum required under the NSW Office of Water guidelines, may be insufficient to achieve the under 5% weed cover threshold. Council stated that given the BGHF is a CEEC, monitoring should continue in perpetuity to prevent ongoing edge degradation.
144. In response, the Applicant further updated the VMP to strengthen long-term monitoring commitments, providing that formal monitoring would continue beyond Year 5 where the under 5% weed cover threshold has not been achieved. Following over 80% plant survival thresholds, monitoring and reporting would continue every 3 years in perpetuity.

6.2.5 The Department's consideration

145. The Department acknowledges that the project would result in the loss of 0.19ha of BGHF, a CEEC and SAI entity under the BC Act, and the removal of 127 trees (including 10 of high retention value of which 6 (T61, T71, T85, T102, T128 and T129) have been subject to objections from Council). The Department is satisfied the Applicant has provided reasonable justification for removal. Retention of these trees would require redesign of the building to accommodate their TPZs, resulting in an approximate 38% reduction in GFA. This would not

constitute a minor refinement to the building layout and may compromise the project's educational objectives.

146. The Department is satisfied that, on balance, the biodiversity impacts of the project are acceptable as:

- the Applicant tested alternative building form and location scenarios to retain the significant trees, and has demonstrated that each option would result in greater biodiversity impact, impact on existing school infrastructure, or would not meet the school's educational and operational requirements. Accordingly, the Department is satisfied that the avoidance and minimisation process has been satisfactorily undertaken in accordance with the BAM
- residual impacts would be offset through planting of 61 replacement trees including high value indigenous species, management of the retained BGHF corridor under the VMP including ongoing monitoring beyond Year 5 where required, and the retirement of 3 ecosystem credits through the Biodiversity Offsets Scheme (BOS)
- the impact is restricted to the edge of a disturbed patch of low to moderate integrity BGHF (VIS of 28.2) within an urbanised setting
- the larger, better condition 40m to 70m wide BGHF corridor north of the development site including 171 BGHF trees, would be retained and managed under the VMP
- the project would retain Trees T123, T142, T169, T175 and T180, with tree-sensitive construction methods supervised by a project arborist and certified at all relevant stages of construction
- fauna impacts would be minimised through pre-demolition microbat surveys, pre-clearing fauna surveys, ecologist supervision, and the installation of microbat nest-boxes and habitat features within the management zones
- the SAI assessment, prepared in accordance with BAM section 9.1, concludes that the proposal would not increase landscape fragmentation or reduce ecological connectivity, and is not expected to result in a serious and irreversible impact on BGHF. The Department accepts the Applicant's conclusion that the proposal is unlikely to result in a serious and irreversible impact on BGHF
- hydrological and soil profiles within the retained BGHF would not be materially altered, with stormwater detention limiting post-development flows to pre-development levels and excavation confined to the development footprint

- CPHR confirmed that previously raised biodiversity matters have been adequately addressed, subject to recommended consent conditions for credit retirement, BDAR mitigation and AIA tree protection.
147. The Department concludes that the biodiversity impacts of the proposed development, including the loss of 0.19ha of BGHF and the removal of 127 trees, are acceptable in the context of the project's educational function, the retention and management of the larger BGHF corridor north of the development site, the avoidance and minimisation analysis undertaken in accordance with the BAM, and the project's offset and management commitments.
148. The Department recommends conditions of consent requiring:
- retirement of 3 ecosystem credits for PCT 3136 in accordance with the Biodiversity Offsets Scheme
 - implementation of mitigation measures recommended in the revised BDAR, including pre-demolition microbat surveys, pre-clearing fauna surveys, ecologist supervision, and reuse of habitat features
 - implementation of tree protection measures and tree sensitive construction methods recommended in the revised AIA, including project arborist supervision and certification at all relevant stages of construction
 - the planting of 61 replacement trees with high value indigenous species characteristic of BGHF
 - implementation of the VMP, including its recommendations for the planting schedule, weed management plan, habitat installation, and long-term monitoring extending beyond Year 5 where performance criteria have not been met.

6.3 Traffic and parking

6.3.1 Construction traffic and parking

149. The EIS included a Construction Traffic Management Plan (CTMP) detailing proposed construction timing, construction vehicle routes and types, construction worker parking arrangements, and construction traffic management measures.
150. Construction is anticipated to occur over 24 months in 2 phases, three months of demolition and 21 months of building works and landscaping.
151. Construction hours would be Monday - Friday 7:00am to 6:00pm, with no weekend work proposed. Truck movements would be restricted to outside DOPU peak periods.

152. Construction vehicles would access the site via Pacific Highway, Livingstone Avenue, Everton Street and Avon Road to Gate 2 (closest gate to the proposed SIP – see **Figure 4**).
153. The largest vehicle is anticipated would be a 12.5m heavy rigid vehicle, with truck-and-dog vehicles potentially used for demolition and material delivery, subject to swept path assessment in the detailed CTMP.
154. The Applicant states that peak construction is estimated to generate up to 74 heavy vehicle movements per day, and up to 39 light vehicle movements in AM and PM peak when construction workers arrive and depart the campus.

6.3.1.1 Temporary changes to existing staff parking

155. Staff parking at the Kelso and Conde on-site campus carparks would be temporarily reduced or unavailable during construction. The Applicant proposes temporary replacement staff parking across the campus and an off-site agreement with the Gordon-Pymble Uniting Church (approximately 700m walking distance from the school's main entry), with all temporary areas reverting to their current use after construction. Permanent staff parking changes are addressed in **Section 6.3.2. Table 13** outlines the Applicant's proposed car park and staff parking arrangements during construction.

Table 13 | Proposed car park and staff parking arrangements during construction.

Location	Current allocation / use	During construction	Change
Kelso	40 staff spaces	10 staff spaces retained - 30 spaces converted to construction worker use	-30 staff spaces
Condo	59 staff spaces	Closed for demountable classrooms	-59 staff spaces
Back Court	Used for Grey House Precinct construction worker parking	46 staff spaces	+46 staff spaces
Oval (south east side)	Verge	24 formalised spaces	+24
Lower Junior School	Verge	4 new spaces	+4
Flagpole	Existing layout	2 new temporary spaces	+2

Location	Current allocation / use	During construction	Change
Uniting Church	Off-site	7 spaces via private agreement	+7
Staff places displaced			-89
Temporary replacements			+83
Temporary shortfall during construction			-6

6.3.1.2 Construction worker parking

156. Construction worker parking would be provided on-site at the Kelso carpark (40 spaces) and the Applicant proposes a tandem parking arrangement for 10 light vehicles on the service road behind the SIP building. The Applicant estimates demand of 46 vehicles, based on a 115-person workforce and 40% private vehicle mode share. The proposed number, layout and location of construction worker parking spaces would be included in the detailed CTMP. Proposed construction worker parking allocation and demand is detailed in **Table 14**.

Table 14 | Construction worker parking

Construction worker parking (on-site)	Spaces
Kelso car park (30 current spaces used in tandem arrangement to fit up to 40 cars)	40
Service road behind SIP	10
Total on-site provision	50
Estimated peak demand (115 workers × 40% private vehicle mode share)	46
Surplus	+4

157. Despite the estimated surplus of construction worker parking reported by the Applicant, the Department requested on-street parking surveys to inform its assessment of potential overflow on-street parking by construction workers (see **Section 5.3**). The survey results showed that on-street parking on four roads adjoining the school site was near, or at

capacity between 9:30am and 2:30pm on the 2 weekdays surveyed. Council's RtS advice recommended that the CEMP be amended to include a requirement that the developer/builder actively monitor the travel mode and car-pooling arrangements of construction workers to reduce potential on-street parking.

6.3.1.3 Department consideration

158. The Department considers that for construction worker parking to be contained within the school site, the proposed 50 on-site construction worker parking spaces is reliant on the successful function of the tandem arrangement for parking within the Kelso carpark and the service laneway, and the Applicant's 40% vehicle mode share target being achieved.
159. The Department acknowledges a 6-space temporary staff parking shortfall compared to current staff car parking allocation, and that the proposed agreement provided in the CTMP for temporary use of 7 spaces for school staff at the Gordon-Pymble Uniting Church would need to be formally executed before commencement of works, to maintain the Applicant's expected shortfall.
160. Notwithstanding, the Department considers proposed construction parking arrangements acceptable on the basis that impacts are temporary, additional staff parking spaces would be provided during construction, and the Applicant proposes a range of measures in the CTMP aiming to reduce construction worker vehicle use.
161. The Department has recommended conditions requiring a detailed CTMP to be prepared in consultation with Council and approved prior to commencement of construction. The CTMP would confirm the final number, layout and location of temporary parking spaces, and detail measures to reduce private vehicle use by construction workers and staff.

6.3.2 Operational traffic and parking

162. A Traffic Impact Assessment (TIA) was prepared for the project, assessing existing transport conditions and the operational transport impacts of the proposal. The site is accessed via 3 gates on Avon Road and is serviced by Pymble train station (200m to the east), bus routes on Pacific Highway, and 5 PLC private bus services.
163. The project would replace existing school buildings and does not increase student or staff numbers. As such, the Applicant states that no additional trip generation is anticipated, and the surrounding road network is not expected to be impacted.
164. A single space, basement loading dock is proposed for service vehicles, accessed via the existing 3.6m wide service road adjoining the proposed SIP building. The loading space would accommodate small to medium size utility trucks and vans. Swept path analysis

provided in the TIA confirms acceptable manoeuvring with reverse-in forward-out via Gates 2 and 3.

165. No additional car or bicycle parking is proposed as the Applicant states that no additional demand is generated. Six existing end of trip facilities and 2 bicycle rack areas within the school site would remain unchanged.
166. The TIA states pedestrian safety at the DOPU area adjacent to the Flagpole would be improved with a modified kerb/paving redesign, reducing intersection size and zebra crossing length. No change to DOPU spaces is proposed, with 4 DOPU spaces maintained adjoining the development site at the Flagpole area.
167. School run special events on Saturdays and Sundays would occur outside standard school hours. The Applicant states that existing on-campus supply would be sufficient to accommodate parking demand due to reduced staff use.
168. The Applicant conducted a school site parking survey in 2024 which determined there were 431 formal car parking spaces provided on site for staff and visitors.
169. Permanent parking changes proposed as part of the project are shown in **Table 15**.

Table 15 | Permanent parking changes proposed as part of the project

Location	Current allocation / use	Post construction / completion	Change
Executive Shed	6 Board Member spaces	Removed (replaced by SIP building)	-6
Flagpole (visitor)	4 visitor spaces	Removed (modified kerb / pedestrian works)	-4
Flagpole (staff)	6 staff spaces	Reallocated as shared staff / Board Member use	0 (allocation change only)
Centenary carpark	5 spaces currently used for storage (these spaces are not included in the existing number of spaces used on site)	Storage would be cleared and the spaces reallocated for staff use (these spaces will be added back into the total number of spaces on site)	5 (existing spaces reinstated)
Existing spaces removed			-10

Location	Current allocation / use	Post construction / completion	Change
New spaces added			0
School site total	431 spaces (staff and visitor)	426 spaces (including 6 in shared-use arrangement)	-5 spaces

170. An Operational Transport and Access Management Plan (OTAMP), dated 16 May 2025, was provided with the EIS. The OTAMP responds to condition requirements for an updated OTAMP under a Council DA (DA0041/23 - increase in student numbers to 2,550 students) and SSD-17424905 (Grey House Precinct). The OTAMP reflects SEARs requirements for the current project and addresses pedestrian routes and crossings, drop-off/pick-up operations and management, traffic controller arrangements, parking allocation across the campus, measures to discourage Year 12 students from driving, and a monitoring and review program.

6.3.2.1 Department consideration

171. The Applicant's TIA framed the change in permanent parking as resulting in no net loss of parking supply on the basis that the loss of 6 permanent board member spaces would be reallocated to a shared arrangement with staff spaces at the Flagpole area. The Department accepts the Applicant's position that the 6 staff spaces at the Flagpole area would serve as shared spaces for staff and school board members with minimal expected overlap of demand on the basis that Board attendance is occasional, and predominantly outside standard school operating hours.
172. Despite this, the Department notes that the project would permanently remove 10 current dedicated formal parking spaces on the campus (6 Board and 4 visitor), and reinstate 5 spaces at the Centenary carpark. As a result, there would be a 5 space shortfall from the existing number.
173. Despite the 5 space shortfall, the Department considers that the reinstatement of 5 spaces within the Centenary carpark and the 6 space shared use arrangement is acceptable, subject to implementation through the updated OTAMP, and on balance, considers that the demand for parking would remain at a similar level compared to the pre-development scenario.

174. For school run special events, the Applicant advised that existing robotics competitions and other special events are run at a frequency of approximately 10 events per year. This frequency would likely be maintained for use of the SIP building for special events. The Department considers that a condition to restrict special events to maximum of 10 per year calendar year would be appropriate to ensure potential on-site traffic and parking impacts are minimised.
175. The Department is satisfied that operational traffic and parking impacts of the project would be minor on the basis that:
- the project would not increase student or staff numbers or generate additional trip demand on the surrounding road network or increased on-site parking demand
 - the net loss of 10 parking spaces would be offset by reinstatement of 5 spaces in the Centenary carpark, and the shared use of 6 parking spaces, allocated to school staff and board members who would likely not generate demand for parking spaces at the same time
 - the proposed loading dock would be accessed by the existing service road and would accommodate loading/unloading of vehicles without impacting the amenity of nearby residential development or existing school users
 - proposed works to the kerb and surrounding paving adjoining the Flagpole would deliver improved pedestrian safety
 - special events that already occur as part of the existing school operations, and would continue to be accommodated through existing on-site existing parking spaces on weekends, when typical on-site visitor and staff parking use are significantly reduced
 - for school run special events over 100 people, an Out of Hours Event Management Plan would be prepared and include measures to encourage non-vehicular travel to the school, promote and support the use of alternate travel modes, and measures to minimise localised traffic and parking impacts
 - subject to conditions, school run special events would be restricted to 10 events per calendar year
 - the OTAMP addresses operational transport, parking and access matters relevant to the future SIP and provides an established framework for ongoing management of pedestrian, parking and DOPU activity.
176. The Department has recommended conditions requiring:
- a minimum of 426 on-site formal car parking spaces to be provided and maintained across the campus

- the OTAMP detail the location of all car parking spaces on the school campuses and their allocation
- school run special events of over 100 people to continue to require an Out-of-Hours Event Management Plan, including traffic and parking arrangements
- school run special events be restricted to 10 events per calendar year.

177. Subject to these conditions, the Department is satisfied that operational traffic and parking impacts would be minor and appropriately managed.

6.4 Other issues

178. The Department's consideration of other issues is summarised in **Table 16**.

Table 16 | Assessment of other issues

Issue	Findings	Department's consideration and recommended conditions
Construction noise and vibration	A noise and vibration impact assessment (NVIA) was prepared for the project, addressing both operational and construction noise and vibration impacts. The development site is within the established school campus, with nearby residential dwellings located along Avon Road. Five nearby sensitive receivers were identified as residential properties along Avon Road (Nos. 35, 39, 41, 45 and 49). Unattended noise monitoring was undertaken at the western boundary of the site over a 12-day period in early 2025 to establish background and ambient noise levels. The measured Rating Background Levels (RBL) at the surrounding residential receivers were 42 dB(A) (daytime), 38 dB(A) (evening) and 30 dB(A) (night-time). The <i>Interim Construction Noise Guideline</i> (DECCW, 2009) was adopted to derive Noise Management Levels (NMLs). For standard construction hours, the noise affected NML at the residential receivers was determined to be 52 dB(A) (RBL + 10 dB), with the highly noise affected level being 75 dB(A).	The Department has reviewed the NVIA and is satisfied it provides an appropriate assessment of construction noise and vibration impacts. Whilst construction is temporary, the Department recognises that construction has the potential to impact both the closest off-site residential receivers and existing on-campus school users, particularly during the noisiest activities such as ground works. The Department notes that, although the NVIA's modelled receivers are limited to the 5 nearest residential properties along Avon Road, the construction noise predictions and mitigation framework provide an indication of the likely scale of impact across

Issue	Findings	Department's consideration and recommended conditions
	Construction is anticipated to occur in a single stage over approximately 24 months and to be confined to standard construction hours (Monday–Friday 7:00am–6:00pm and Saturday 8:00am–1:00pm). Predicted construction noise levels at the 5 nearest residential receivers were modelled for each phase of works (site establishment, ground works, structure, internal works, common and external works). The NVIA indicated that there would be exceedances of noise management levels, however no receivers would experience noise above 75 dB(A) (highly noise affected), with the highest noise levels occurring during ground works (predicted combined levels of up to approximately 75 dB(A)). Notwithstanding these exceedances, predicted levels remain at or below the highly noise affected level (75 dB(A)) at all modelled receivers. Construction traffic was assessed against the NSW Road Noise Policy 2011 2 dB increase threshold. Traffic volumes on surrounding roads would need to increase by approximately 60% from existing flows for a 2 dB increase to occur, which is not anticipated. The NVIA states that a CTMP would be prepared once a building contractor is appointed, which would address unexpected noise from construction traffic. The NVIA's modelled receivers focused on the surrounding residential properties most exposed to off-site noise emissions. Existing school buildings adjacent to the SIP construction footprint were not separately modelled in the NVIA. However, the Applicant confirmed (and the Mitigation Measures Table states) that the school would: • implement a regular internal communication plan to staff regarding noisy activities, to inform decisions about temporarily relocating classes	all sensitive receivers in the vicinity. Retained school buildings closer to the works (the Science and Colonnade buildings) are likely to experience high external noise levels. However, the school users would benefit from onsite project coordination strategies and measures to coordinate construction scheduling and class locations on a day-to-day basis throughout the duration of works. The Department considers that impacts on both off-site residential receivers and on-campus school users can be appropriately mitigated and managed through the measures recommended in the NVIA, and the Mitigation Measures Table including: • preparation and implementation of a Construction Noise and Vibration Management Plan by a suitably qualified noise expert, including: – measures to identify all sensitive receivers (including school buildings on the site occupied during construction) and the predicted construction noise and vibration levels at each – a complaints management system and a program to

Issue	Findings	Department's consideration and recommended conditions
	• issue the school diary to construction tenderers so that the construction program is planned around sensitive school periods (such as exams and key school events). A range of management and mitigation measures were recommended in the NVIA and Mitigation Measures Table, including general mitigation measures aligned with Australian Standard AS 2436-2010 <i>Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites</i>, acoustic enclosures or screening for static plant, vibration monitoring at the most affected structures (with operator warning and halt levels), validation measurements at commencement of works, alternative equipment or processes, work scheduling, complaints management, community consultation and contingency planning. Noise concerns were raised by in public submission. The concern related to substantial noise resulting from demolition and excavation and the impact on the health of residents. Council did not provide any comment on construction noise impacts.	monitor and report on construction performance against the management measures – a Communication Protocol with the school requiring construction activities to be aligned with the academic calendar (including examination periods) where feasible, advance written notification of high noise and vibration generating activities, identified points of contact, and scheduled respite periods • employee, contractor and subcontractor inductions covering noise and vibration mitigation requirements; and • a complaints management system with a 24-hour contact number prominently displayed on site, and proactive community consultation prior to and during the works. The Department also recommends standard conditions limiting construction to standard hours and requiring the CNVMP to be prepared in consultation with neighbouring residents prior to the commencement of works. Subject to these conditions, the Department is satisfied that construction noise and vibration impacts can be appropriately

Issue	Findings	Department's consideration and recommended conditions
		mitigated and managed in accordance with the project-specific noise emission criteria established in the NVIA.
Operational noise and vibration	The NVIA assessed the anticipated operational noise impacts of the project. Hours of operation for the SIP would be Monday - Friday 7:30am to 6:00pm, with weekend and school holiday use limited to special events between 8am to 10pm. Operational noise sources were identified as: • mechanical plant and equipment within 2 rooftop plantrooms • vehicle movements from the single basement loading space • student noise from outdoor terraces and learning areas • noise from internal teaching spaces and the school auditorium • public address system and school bells The Applicant also considered the impact of surrounding traffic upon the new internal learning environment. As there is no specific acoustic criteria for assessment of acceptable noise levels for school operation, the NVIA adopted project specific NMLs using the Association of Australasian Acoustical Consultants (AAAC) Guideline for Child Care Centre Acoustic Assessment, adopting a daytime NML of 47 dB(A) for outdoor play (more stringent than the AAAC's background + 10 dB threshold of 52 dB(A), to align with the NSW EPA Noise Policy for Industry intrusiveness approach). The NVIA found that predicted noise levels from outdoor play areas would reach up to approximately	The Department has considered the findings of the NVIA and considered issues raised by Council and concludes that the proposal would not unreasonably impact on the acoustic amenity of nearby residents, subject to conditions. These include: • a verification report to be prepared by a suitably qualified acoustic consultant demonstrating compliance with the noise criteria identified in the NVIA • compliance with the noise mitigation measures and operational controls recommended in the NVIA • post installation acoustic verification testing in accordance with the NPI to confirm compliance • use of the SIP outside of proposed hours of operation is not permitted unless separately approved. Subject to these conditions, the Department considers operational noise impacts would be acceptable.

Issue	Findings	Department's consideration and recommended conditions
	55 dB(A) at the surrounding residential receivers during periods of full student use of outdoor areas such as recess and lunch, exceeding the AAAC guideline threshold of 52 dB(A) by approximately 3 dB(A), and the more stringent project specific NML of 47 dB(A) by approximately 8 dB(A). The NVIA notes that noise levels during structured outdoor learning would occur more frequently than peak school use periods, and noise levels would be significantly lower. Subject to recommended operational controls (including supervision of outdoor play by school staff to prevent excessive yelling and restriction of outdoor play to school daytime hours), the NVIA concludes that predicted noise levels from outdoor areas would be acceptable. The NVIA found that internal noise levels from the use of the internal Auditorium would not exceed NML when the entry doors are open, and the noise level within the auditorium does not exceed 85 dB(A). The NVIA recommends operational controls for the use of the Auditorium including that entry doors must be closed outside of daytime periods. Weekend school run special events would be run within the Auditorium and would be subject to the NVIA's operational controls. The Department recommends a condition to restrict the frequency of school run special events to a maximum of 10 events per calendar year. The NVIA states that mechanical plant noise was not assessed quantitatively as the final plant equipment is yet to be selected, and that this would be undertaken at the Construction Certificate stage. Council raised concerns regarding the acoustic performance/effectiveness of the proposed rooftop plant's 5m architectural louvre enclosures, a	

Issue	Findings	Department's consideration and recommended conditions
	referenced 300 mm acoustic louvre, and predicted compliance with nighttime noise trigger levels. The Applicant responded with a revised NVIA which removed the 300mm acoustic louvre reference, clarified that the 5m louvres are not specifically proposed as acoustic mitigation, and confirmed detailed acoustic modelling will be undertaken to ensure compliance with nighttime noise trigger levels at the Construction Certificate stage. Council subsequently advised that the matters raised in its submission regarding the rooftop plant had been satisfactorily addressed. The Applicant proposed mitigation measures to ensure the development complies with relevant policies and guidelines, mainly the NSW EPA Noise Policy for Industry (NPI). Mitigation measures include: • acoustic treatment of selected rooftop mechanical plant equipment to comply with the NPI • supervision of outdoor play and limiting use of outdoor areas to school daytime hours • closing classroom windows during high intensity activity, with no classroom use during the nighttime period • operational controls on the auditorium (doors closed for evening use, audio limited to 85 dB(A)) • the PA system not to exceed RBL + 5dB(A) at residential receivers. The NVIA recommended that for external noise intrusion (including vehicle noise) to not impact on learning spaces, facades should include glazing of at least 6.38 mm laminated glass for general learning areas and 10.38 mm laminated glass for the auditorium.	

Issue	Findings	Department's consideration and recommended conditions
	The Applicant concluded that the operation of the proposal would not adversely impact upon sensitive receivers and would operate within acceptable limits in accordance with the NSW EPA NPI.	
Flooding and stormwater	A preliminary Flood Report, and a Water Management Plan were lodged with the EIS. Key findings from the Flood Report were that the: • school site is not identified as flood prone land under the Ku-ring-gai Council flood mapping • development site is located on a local high point in the upstream area of the Avondale Creek catchment, adjacent to a minor tributary, and is not affected by mainstream flooding • school site is subject to shallow, locally generated rainfall runoff and minor overland flows from storm events, with runoff from the small upstream area less than 20 m³/s • proposed SIP building is currently located within an existing local overland flow path, which would be diverted around the building subject to proposed stormwater infrastructure design. In considering the overland flow path, the Department notes that, consistent with NSW practice and the <i>NSW Flood Risk Management Manual</i> (2023), shallow inundation resulting from rainfall within the site, or from its upstream catchment, is not regarded as 'flooding'. The Manual's policies and procedures apply to inundation from defined watercourses and identified floodplains, not to local overland flow. The local overland flow path passing through the development site is therefore not treated as flooding, but as being subject to standard stormwater management practices and Australian Rainfall and Runoff (ARR) guidance.	The Department has reviewed the Applicant's Flood Report and Water Management Plans, EIS and RtS advice from Council and CPHR. The Department is satisfied that: • the site is not flood prone and is not affected by mainstream flooding • residual flood/inundation risk from local rainfall runoff would be appropriately managed through the proposed stormwater drainage design, OSD tanks, and diversion of local overland flow around the SIP building • Council's stormwater and water management were adequately addressed in the updated Water Management Plan • the proposed stormwater design meets Council's requirements. The Department has recommended a condition requiring the project's stormwater management system be designed and implemented in consultation with Council and in accordance

Issue	Findings	Department's consideration and recommended conditions
	Stormwater management measures incorporated into the project's design include grading of pavements away from building entrances (such as at the southern entrance and loading dock), 2 on-site stormwater detention (OSD) tanks to manage and limit peak stormwater flows in accordance with Council's discharge requirements, water quality treatment within the OSD tanks to meet Council's pollutant load reduction targets, a 25kl rainwater tank for landscape irrigation to reduce site runoff, a level spreader swale at the north-eastern boundary to safely convey upstream overland flow around the SIP building, and gravity drainage of the basement to the existing downstream stormwater network. The basement finished floor level is approximately 4m above the bed level of the adjacent minor tributary. In its EIS advice, CPHR confirmed the development site is not flood prone and that no further flood risk management input was required, subject to habitable floor levels being identified in accordance with Clause 3 of the Ku-ring-gai DCP section 24D.3 and Table 3 of the flood assessment being amended to reflect this clause. Council did not comment on flood risk. In respect of stormwater and water management, Council requested further information including supporting calculations to demonstrate the rainwater tank achieves a 50% reduction in runoff days, clarification of the rainwater tank's purpose, submission of Council's OSD calculation sheet, and clarification of the basement drainage and pump-out arrangement. The Applicant's RtS provided an updated Flood Report which addressed Clause 3 of the Ku-ring-gai DCP (section 24D.3).	with relevant standards and guidelines.

Issue	Findings	Department's consideration and recommended conditions
	The Applicant provided an updated Water Management Plan which addressed Council's EIS advice including water balance, demonstrating compliance with the 50% reduction in runoff days, Council's OSD calculation sheet confirming compliance with Council's discharge requirements, clarification that the rainwater tank is sized for landscape irrigation only, and confirmation that basement floor levels permit gravity drainage to the downstream stormwater network (therefore a pump-out tank would not be required). Council's RtS advice acknowledged the adequacy of the Applicant's response and did not provide further comment. CPHR's RtS advice confirmed that the updated Flood Report addressed CPHR's previous comments and that no further flood risk management input was required.	
Contamination and hazards	A Detailed Site Investigation (DSI), an Acid Sulfate Soils Management Plan and a Hazardous Materials Survey were included with the EIS. Key findings of the DSI were: - the site has a long history of educational use, with potential areas of environmental concern (PAECs) associated with historical agricultural use, possible uncontrolled fill, and the presence of asbestos-containing materials and lead-based paints within the buildings to be demolished 23 soil samples were taken across the development footprint and tested below the adopted health-based criteria (HIL-A) for sensitive land uses such as schools - the current risk of exposure of contaminants to onsite and offsite human and environmental receptors is considered low, and no contaminants of concern or areas of environmental concern	The Department has reviewed the DSI, the Hazardous Materials Survey, and Council's EIS and RtS advice, and is satisfied that: - accessible parts of the development area have been adequately sampled and the site does not contain any contaminants of concern, with risk to onsite and offsite receptors classified as low - hazardous materials identified within the 4 buildings to be demolished can be safely managed and disposed of in accordance with the recommendations of the Hazardous Materials Survey and

Issue	Findings	Department's consideration and recommended conditions
	were identified within the accessible parts of the development area - the building footprints could not be sampled prior to demolition. An addendum sampling and analysis program is recommended after demolition, with a Remedial Action Plan (RAP) to be prepared only if contamination is then identified. Key findings of the Hazardous Materials Survey were: - non-friable asbestos was detected in accessible areas of the 4 buildings proposed for demolition, posing no immediate risk to staff or students in its current state but requiring removal by a licensed asbestos contractor prior to demolition - lead paint was detected on selected windows and doors of the Robert Vicars Building and is to be managed in situ until removal as part of demolition - smaller quantities of synthetic mineral fibres, and refrigerant gases were also identified, all of which can be safely managed through standard demolition controls and disposal practices. The Acid Sulfate Soils Assessment concluded that the likelihood of acid sulfate soils occurring at the site is low and that development and construction activities are unlikely to be impacted by them. In its EIS advice, Council raised concerns regarding land contamination, requesting that either the DSI demonstrate the site is suitable without remediation, or that a RAP be submitted prior to determination. Council expressed the view that deferral of a RAP until post-consent should not be supported. The Applicant's RtS response to Council maintained that the DSI confirms the site does not contain contaminants of concern within the accessible development footprint, and that further investigation	applicable WHS and NSW EPA requirements - post-demolition sampling of the building footprints, and preparation of a RAP if contamination is then identified, is the appropriate and standard means of managing the residual risk on developed site, where the building footprints cannot be physically accessed until demolition occurs. In relation to Council's position that a RAP should be submitted prior to determination, the Department notes that any RAP prepared at this stage would address contamination that has not been confirmed and may not exist. The Department considers the more appropriate and supported approach is to confirm site suitability through standard conditions of consent. The Department has therefore recommended conditions requiring: - the Applicant to undertake site investigations prior to the commencement of construction involving ground disturbance to confirm the full nature and extent of any contamination, prepared in accordance with the <i>Contaminated Land Management</i>

Issue	Findings	Department's consideration and recommended conditions
	can only be meaningfully undertaken after the existing buildings are demolished and their footprints become accessible. The Applicant noted that, if any contamination is identified at that point, a RAP would then be prepared in accordance with NSW EPA guidelines.	Act 1997 and EPA guidelines by suitably certified consultants, and to update and implement the recommendations of the DSI and the unexpected finds procedure throughout the project • should ongoing on-site management of soil or groundwater contamination be required following further investigations, the Applicant engage a NSW EPA-accredited Site Auditor and obtain a Section A2 Site Audit Statement, accompanied by an Environmental Management Plan, confirming the land is suitable for the proposed use prior to the commencement of operation • preparation and implementation of an Asbestos Management Plan and removal of all asbestos-containing materials in accordance with the Hazardous Materials Survey, prior to demolition • an unexpected finds protocol to form part of the Construction Environmental Management Plan (CEMP) • classification and disposal of any excavated material in accordance with the NSW EPA Waste Classification Guidelines.

Issue	Findings	Department's consideration and recommended conditions
		Subject to these conditions, the Department is satisfied that the site is suitable for the proposed continued educational use in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021, and that the hazards and site contamination impacts of the proposal would be appropriately mitigated and managed.
Social impact	A Social Impact Assessment (SIA) accompanied the EIS, prepared in consideration of the Department's Social Impact Assessment Guidelines (SIA Guidelines). The SIA identified social impacts through primary and secondary data captured through engagement with Council, the school community and surrounding residents. Key negative impacts identified by the Applicant in the SIA include: • construction noise and dust impacts on the College community and surrounding residents • disruption to teaching and learning during construction, including the temporary relocation of classes to demountable buildings • increased construction traffic and reduced on-street parking during construction • permanent loss of 4 visitor car parking spaces during operation • loss of reference to the school's history through the demolition of existing buildings named after persons of significance to the College • cumulative impacts associated with ongoing and recent construction projects at the College.	The Department has reviewed the findings of the SIA and the provided mitigation and measures. The Department acknowledges that there would be short term social impacts associated with the construction of the proposal, including amenity impacts on surrounding residents and some disruption to teaching and learning environments. The Department also acknowledges potential cumulative impacts associated with concurrent and recent construction projects at the College. The Department is satisfied that construction management plans and operational management plans would sufficiently mitigate negative social impacts identified in the SIA and the specific mitigation and enhancement measures proposed by the

Issue	Findings	Department's consideration and recommended conditions
	Key social benefits identified in the SIA include: • improved educational facilities including specialist STEAM-based learning and teaching spaces • enhanced opportunities for student interaction and connection through new indoor and outdoor spaces • recognition and representation of Aboriginal cultural heritage through the Connecting with Country process • improved pedestrian access and wayfinding within the College campus during operation • pathways into STEAM-related tertiary education and employment for young women. The SIA included mitigation and enhancement measures to address identified social impacts including: • communication and ongoing engagement • construction management including a CMP and CTMP • provision of high quality demountable buildings to support continued learning during construction • connecting with country elements incorporated into the architectural and landscape design • operational GTP initiatives.	Applicant would likely address identified impacts. On balance, the Department considers the proposal would provide significant long term positive social impacts which would benefit school users through the provision of improved educational infrastructure, including specialist STEAM facilities supporting young women, and recognition of Aboriginal cultural heritage.
Aboriginal cultural heritage	The EIS included an Aboriginal Cultural Heritage Assessment Report (ACHAR) that considered the impact of the project on Aboriginal cultural heritage, including the potential of the site to contain archaeological items of significance. The ACHAR found that: • no AHIMS registered sites are located within the study area	The Department has reviewed the ACHAR and considers that potential impacts on Aboriginal cultural heritage have been appropriately addressed. The Department recommends conditions requiring the implementation of the unexpected finds policy and the Aboriginal

Issue	Findings	Department's consideration and recommended conditions
	- no Aboriginal objects or sites were identified during the archaeological survey - the study area demonstrated significant levels of disturbance caused by development of the Pymble Ladies' College campus across the 20th century, and Aboriginal objects are unlikely to be present - no specific cultural heritage values were identified through background research or stakeholder consultation. The ACHAR was reviewed and endorsed by Registered Aboriginal Parties consulted in accordance with the <i>Aboriginal cultural heritage consultation requirements for proponents 2010</i> (DECCW 2010). The ACHAR recommended the implementation of an unexpected finds policy during construction. Heritage NSW's EIS advice requested confirmation that the Aboriginal Heritage Office had been contacted and noted that the study area had been altered since the ACHAR was finalised. The Applicant's RtS confirmed the Aboriginal Heritage Office was invited to register for consultation with no response received and provided a memo confirming that the altered boundary would not impact Aboriginal cultural heritage. Heritage NSW's RtS advice confirmed that the matters raised in its EIS submission had been adequately addressed and provided recommended draft conditions of approval.	cultural heritage management measures recommended by Heritage NSW through the implementation of an Aboriginal Cultural Heritage Management Plan.
Waste management	A Waste Management Plan (WMP) was lodged with the EIS and covered both the demolition and construction phase and the ongoing operation of the SIP. Key findings of the WMP were:	The Department has reviewed the WMP, the EIS and Council's advice, and is satisfied that the: WMP appropriately identifies, quantifies and classifies the waste streams expected to be

Issue	Findings	Department's consideration and recommended conditions
	- the main demolition and construction waste would be concrete, masonry, steel, timber, plasterboard, mixed recyclables and residual waste, together with hazardous materials (primarily non-friable asbestos and lead paint) identified by the Hazardous Materials Survey and to be removed by a licensed contractor prior to demolition - during construction, waste would be either loaded directly into covered trucks or stored on the worksite in covered, labelled skip-bins within the worksite boundary. Disposal times and frequencies would be coordinated with the school to minimise disturbance, given the school will remain operational throughout demolition and construction - the SIP building is expected to generate approximately 2,170L of recyclables and 2,650L of residual waste per day, with source separation at the point of generation across learning spaces, staff areas and the kitchen/canteen facilities - operational waste would be collected daily by cleaning staff and transferred to a dedicated waste room in the basement of the SIP building (36.4m² in size, providing sufficient capacity for the required 18.8m² of bin storage), from which it will then be moved to the school's existing centralised waste facility at the southern end of the campus for consolidation and off-site disposal by a private contractor - additional 240L bins for comingled recyclables and residual waste are to be distributed throughout the Campus Commons and serviced under the school's existing outdoor bin servicing arrangements. Council reviewed the proposed waste arrangements against Part 25 of the DCP and, in their EIS advice,	generated during both demolition and construction, and ongoing operation - proposed measures to reuse, recycle and safely dispose of construction and demolition waste, including hazardous materials, are consistent with NSW EPA guidance and the recommendations of the Hazardous Materials Survey - proposed bin storage areas in the basement of the SIP building are appropriately sized for anticipated operational waste volumes, and integration into the school's existing centralised waste facility provides suitable waste servicing arrangements. The Department has recommended conditions requiring implementation of the WMP, including its recommendations for separate management of any liquid or hazardous waste generated from the science, design and technology spaces in accordance with the relevant Australian Standards, and preparation of a CEMP incorporating site-specific demolition and construction waste controls. Subject to these conditions, the Department considers the waste

Issue	Findings	Department's consideration and recommended conditions
	confirmed that the proposed bin storage, servicing and access provisions for both the SIP building and the Campus Commons satisfy Council's requirements.	management impacts of the proposal, during both construction and operation, to be acceptable.
Timing and sequencing, and temporary arrangements	The EIS and supporting Preliminary Construction Management Plan outline the proposed staging, timing and decanting arrangements for the project. Key aspects detailed by the Applicant are: • construction is proposed to be delivered in a single stage over approximately 24 months, from December 2026 to December 2028, with occupation of the SIP building and Campus Commons anticipated for Semester 1, 2029 • the construction stage comprises three sequential phases including: site preparation and demolition (including removal of the four buildings to be demolished, tree removal and establishment of site access); main construction (civil works, structure, services and façade); and external works and landscaping • the school will remain fully operational throughout construction, with hoardings, temporary protection measures and clear delineation between the construction site and the broader campus to prevent interaction between students and the works • to accommodate students and staff displaced by demolition of the Isabel McKinney Harrison, Dorothy Knox, John Vicars and Robert Vicars Buildings, the College proposes the installation of 14 two-storey demountable classrooms on the existing Conde staff carpark on the northern part of the campus, close to the existing Conde Library and Senior School Centre. The demountables	The Department has reviewed the proposed staging, timing and decanting arrangements and the additional information provided in the RtS and is satisfied that: • appropriate measures would be provided to maintain safe separation between the operational school and the construction site, allowing the school to continue operation during construction • the preliminary information provided for the temporary demountables is sufficient to assess their cumulative impact, and the proposed location on the existing Conde carpark (a sealed bitumen surface with no trees or vegetation) is acceptable. The Department has recommended conditions requiring preparation of a Construction Environmental Management Plan (CEMP) and a CTMP prior to the commencement of works, which would document staging, decanting arrangements and temporary site-management measures to be implemented during construction.

Issue	Findings	Department's consideration and recommended conditions
	would be delivered under a separate planning pathway and do not form part of this SSDA the temporary use of the Conde carpark for demountables would result in the loss of 59 staff parking spaces, which would be compensated through temporary spaces provided in the back court (46), adjacent to the oval (24), within the Junior School (4 on-street) and at the nearby Gordon-Pymble Uniting Church (7). The Department's RFI (issued following exhibition of the EIS) raised concerns under the Department's Cumulative Impact Assessment Guidelines that the siting and impacts of the demountables should be assessed as part of this application. In response, the Applicant provided the additional detail outlined above in the RtS, including a preliminary impact assessment confirming the demountables are proposed on a sealed bitumen carpark with no impacts on vegetation/biodiversity.	Subject to these conditions, the Department considers the timing, staging and decanting arrangements for the project to be acceptable.
Development Contributions	Section 7.12 of the <i>Environmental Planning and Assessment Act 1979</i> provides for a consent authority to impose, as a condition of development consent, a requirement for the Applicant to pay a fixed levy. The Ku-ring-gai Council Section 7.12 Local Infrastructure Contributions Plan 2023 applies to the development and imposes a contribution at the rate of 1% of the cost of works for development with a cost of works greater than \$200,000. The EIS confirms that the proposal is subject to the Ku-ring-gai Council Section 7.12 Local Infrastructure Contributions Plan 2023.	The Department has reviewed the applicable contributions framework and is satisfied that the Ku-ring-gai Council Section 7.12 Local Infrastructure Contributions Plan 2023 applies to the proposed development. A condition requiring payment of development contributions in accordance with the Ku-ring-gai Council Section 7.12 Local Infrastructure Contributions Plan 2023, at the rate of 1% of the cost of works, has been recommended.

7 Evaluation

179. The Department has reviewed the EIS, RtS, RFI, and responses from the Applicant and assessed the merits of the proposal taking into consideration advice from government agencies, Council and public submissions.
180. The Department considers that the project is approvable as it would deliver a modern, purpose-built secondary education precinct that would support the school's operational and curriculum needs and enhance educational outcomes for secondary school students at an established educational establishment. The project would replace ageing school infrastructure, consolidate STEM, robotics, design and technology, and general learning functions into a single building, and would provide upgraded campus open space through the new Campus Commons. The proposal represents a direct investment in social infrastructure exceeding \$50 million and would generate between 92 and 115 FTE construction jobs.
181. The project is consistent with the objects of the *Environmental Planning and Assessment Act 1979* and with the State, district and local strategic planning objectives set out in the Greater Sydney Region Plan – A Metropolis of Three Cities, the North District Plan and the Ku-ring-gai Local Strategic Planning Statement. The proposal is permissible with consent on land zoned SP2 Infrastructure under the Ku-ring-gai Local Environmental Plan 2015 and is consistent with the relevant zone objectives and provisions of applicable State Environmental Planning Policies.
182. The Department identified and considered the project's key issues for assessment to be built form and urban design, biodiversity, and traffic and parking. The Department is satisfied that:
- the height, bulk and scale of the proposed development, including the northern Avon Road interface, are appropriate within the broader school campus context and surrounding landscaped setting, and adjoining residential development
 - impacts on Blue Gum High Forest, a Critically Endangered Ecological Community, and on individual high-significance trees, have been avoided and minimised to the extent reasonable and feasible through revised arboricultural and biodiversity measures, with residual impacts capable of being offset and managed through conditions
 - construction and operational traffic and parking impacts would be minor and could be appropriately managed.

183. The Department has recommended conditions to manage residual environmental and amenity impacts, including conditions relating to biodiversity offsets, tree retention and protection, landscape and vegetation management, construction and operational noise management and parking management.
184. Overall, the Department concludes that the impacts of the development are acceptable and can be appropriately managed or mitigated through the implementation of recommended conditions of consent. Consequently, the Department has formed the opinion that the:
- proposed development is not contrary to the public interest
 - project is approvable, subject to conditions.

Prepared by:



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Recommended by:



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Infrastructure Assessments

Glossary

Abbreviation	Definition
AAAC	Association of Australasian Acoustical Consultants
ACH	Aboriginal Cultural Heritage
ACHAR	Aboriginal Cultural Heritage Assessment Report
ADR	Architectural Design Report
AEP	Annual exceedance probability
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
AQF	Australian Qualifications Framework
ARR	Australian Rainfall and Runoff
BC Act	<i>Biodiversity Conservation Act 2016</i>
BAM	Biodiversity Assessment Method
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
BGHF	Blue Gum High Forest
BOS	Biodiversity Offsets Scheme
CEEC	Critically Endangered Ecological Community
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
CPTED	Crime Prevention Through Environmental Design
CNVMP	Construction Noise and Vibration Management Plan
COLA	Covered outdoor learning area

Abbreviation	Definition
Council	Ku-ring-gai Council
CPHR	Conservation Programs, Heritage and Regulation Group
CTMP	Construction Traffic Management Plan
DA	Development application
dB	Decibel
DCP	Development Control Plan
Department	Department of Planning, Housing and Infrastructure
DOPU	Drop-off/pick-up
DSI	Preliminary and Detailed Site Investigations
EDC	Estimated Development Cost
EFSG	Educational Facilities Standards and Guidelines
EIS	Environmental impact statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPI	Environmental planning instrument
ESD	Ecologically sustainable development
FRNSW	Fire and Rescue NSW
FSR	Floor Space Ratio
FTE	Full-time equivalent
GANSW	NSW Government Architect
GFA	Gross Floor Area
GLS	General Learning Space
HNSW	Heritage NSW
IPC	Independent Planning Commission

Abbreviation	Definition
KLEP	Ku-ring-gai Local Environment Plan 2015
LEP	Local environmental plan
LGA	Local government area
LSPS	Local Strategic Planning Statement
NML	Noise management level
NPI	NSW Noise Policy for Industry
NVIA	Noise and Vibration Impact Assessment
OSD	On Site Detention
OTAMP	Operational Transport and Access Management Plan
PBFP	Planning for Bush Fire Protection 2019
PCT	Plant Community Type
PLC	Pymble Ladies College
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
PMF	Probable Maximum Flood
RAP	Remedial Action Plan
RFI	Request for information
RL	Reduced Level
RFS	NSW Rural Fire Service
RtS	Response to Submissions
SDRP	NSW State Design Review Panel
Secretary	Secretary of the Department of Planning, Housing and Infrastructure
SEPP	State environmental planning policy
SES	State Emergency Service

Abbreviation	Definition
SAII	Serious and Irreversible Impact
SRZ	Structural Root Zone
SSDA	State Significant Development Application
STIF	Sydney Turpentine-Ironbark Forest
SIP	Shelter-In-Place
TAIA	Transport and Accessibility Impact Assessment
TfNSW	Transport for NSW
TPZ	Tree Protection Zone
VIA	Visual Impact Assessment
VIS	Vegetation Integrity Score
VMP	Vegetation Management Plan
WHS	Work Health and Safety
WMP	Waste Management Plan

Appendices

Appendix A – Summary of key amendments to the project

Since lodgement, some aspects of the project have been amended as per Council advice.

A summary of the key amendments is provided in **Table 17**.

Table 17 | Key amendments

Aspect	Original project in EIS	Amended project
Roof plant screening	Roof plant atop the proposed SIP building screened with solid aluminium vertical louvres in a dark grey colour.	Roof plant atop the proposed SIP building screened with solid aluminium vertical louvres in a light grey colour, to appear less prominent and blend better with surrounds.

Appendix B – List of referenced documents

The following supporting documents and information to this assessment report can be found on the Department's website as follows:

1. Environmental Impact Statement (EIS)

www.planningportal.nsw.gov.au/major-projects/projects/pymble-ladies-college-secondary-innovation-precinct

2. Response to Submissions (RtS)

www.planningportal.nsw.gov.au/major-projects/projects/pymble-ladies-college-secondary-innovation-precinct

3. Response to Request for Information (RFI)

www.planningportal.nsw.gov.au/major-projects/projects/pymble-ladies-college-secondary-innovation-precinct

Appendix C – Submissions and government agency advice

All submissions and government agency advice can be found here:

www.planningportal.nsw.gov.au/major-projects/projects/pymble-ladies-college-secondary-innovation-precinct

Appendix D – Statutory considerations

Objects of the EP&A Act

A summary of the Department's consideration of the relevant objects (found in section 1.3 of the EP&A Act) are provided in **Table 18** below.

Table 18 | Objects of the EP&A Act and how they have been considered

Object	Consideration
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	The proposal would provide direct investment in services and social infrastructure to meet the community's changing needs in the non-government school's sector and provide enhanced educational facilities for current and future school users. The proposal will create temporary construction jobs over an estimated 24-month period. The development will not negatively impact on the economic welfare of the community, or the State's natural resources. The project has been designed to minimise impacts to the State's natural and built resources, where possible.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development (ESD), as detailed following this table.
(c) to promote the orderly and economic use and development of land,	The project promotes the orderly and economic use of the land. Educational establishments are permitted with consent in the SP2 Zone under the KLEP 2015. The merits of the proposal are considered in Section 6.
(d) to promote the delivery and maintenance of affordable housing,	Not applicable.
(e) to protect the environment, including the conservation of threatened and other species of	The development site contains a 0.19ha edge BGHF and adjoins a larger BGHF corridor located north of

Object	Consideration
native animals and plants, ecological communities and their habitats,	the existing service road. BGHF is classified as Plant Community Type (PCT) 3136 and listed as a Critically Endangered Ecological Community (CEEC) under the Biodiversity Conservation Act (BC Act). BGHF is also identified as a Serious and Irreversible Impact (SII) entity. The project would remove BGHF trees within the development site. An assessment of this impact, discussion of proposed offsets, and the Department's consideration and findings is discussed in Section 6.2.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The school site's southeastern boundary adjoins a Heritage Conservation Area (HCA) and several locally listed heritage items are located on Pymble Avenue, which sits adjacent to the school site's southeast boundary. Three local heritage items are also located opposite the school site's northwest boundary, but not directly oppose the development site. Council and Heritage NSW did not provide comment on the adjoining and nearby HCA or the local heritage items. The Department considers that, given the vegetated corridor providing visual screening between Avon Road and the development site, and the distance between the SIP building and the HCA and heritage items on Pymble Avenue, the project would not impact on heritage values of the HCA and nearby heritage items. Aboriginal Cultural Heritage Assessment Report submitted with the EIS confirmed that no AHIMS registered sites are located within the study area and no Aboriginal objects or sites were identified during the archaeological survey

Object	Consideration
	The recommended conditions ensure unexpected finds are managed appropriately and RAPS are consulted. The Department is satisfied any impacts to Aboriginal heritage can be managed and mitigated, subject to compliance with the recommended conditions. Aboriginal heritage is considered in Section 6.4.
(g) to promote good design and amenity of the built environment,	The project was developed through the NSW State Design Review Panel process. The Department considers the overall built form of the development to be acceptable in the context of the existing school and surrounding environment for reasons discussed in Section 6.1. Consideration of the proposal against the Design Quality Principles set out in Schedule 8 of State Environmental Planning Policy (Transport and Infrastructure) 2021 is provided below.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposal promotes the proper construction and maintenance of buildings, subject to compliance with the recommended conditions of consent.
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State.	The Department publicly exhibited the proposal which included consultation with Council, other State government agencies and relevant authorities and considered the responses received (see Section 5).
(j) to provide increased opportunity for community participation in environmental planning and assessment.	The Department publicly exhibited the project. This included notifying occupiers and landowners in the vicinity of the site about the public exhibition and displaying the project on the NSW planning portal during the exhibition periods (see Section 5).

Ecologically sustainable development

The EP&A Act adopts the definition of ecologically sustainable development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD

requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle
- inter-generational equity
- conservation of biological diversity and ecological integrity
- improved valuation, pricing and incentive mechanisms.

The Department required the applicant to demonstrate how the principles of ESD have been incorporated into the project, including how it addresses:

- national best practice sustainable building principles to improve environmental performance and reduce ecological impact
- projected climate change impacts.

The Applicant has demonstrated a commitment to ESD and sustainability measures, targeting a minimum 5-Star Green Star rating or equivalent, achieved by:

- passive design measures including building orientation, fabric and external shading to optimise daylight, minimise glare and reduce solar heat gain
- maximised natural ventilation and natural lighting in circulation and learning spaces, reducing reliance on mechanical systems
- installation of rooftop photovoltaic panels to generate electricity from solar energy, contributing to on-site renewable energy production
- implementation of a rainwater harvesting system for rainwater collection, storage and reuse, reducing potable water demand
- high efficiency heating, ventilation and air-conditioning systems to optimise thermal comfort
- high efficiency LED lighting with sensor-based controls to reduce overall lighting demand
- high efficiency heat pump hot water systems
- installation of an energy and water metering and monitoring system to monitor consumption
- consideration of embodied carbon through material selection and reporting.

The Department has considered the project in relation to ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the project. On balance, the project is

consistent with the principles of ESD and the Department is satisfied the proposed sustainability initiatives will encourage ESD, in accordance with the objects of the EP&A Act.

Environmental Planning and Assessment Regulation 2021

The Environmental Planning and Assessment Regulation 2021 requires the Applicant to have regard to the State Significant Development Guidelines when preparing their application. In addition, the Planning Secretary's environmental assessment requirements (SEARs) require the Applicant to have regard to the following:

- *Social Impact Assessment Guideline for State Significant Projects*
- *Undertaking Engagement Guidelines for State Significant Projects*
- *Cumulative Impact Assessment Guidelines for State Significant Projects.*

The Department is satisfied that the Applicant has demonstrated the application has been prepared having regard to the guidelines above.

Environmental Planning Instruments (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report refers to the provisions of EPIs that govern the carrying out of the project and were considered in the Department's assessment. EPIs considered as part of the proposal's assessment are:

- State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)
- State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP)
- State Environmental Planning Policy (Sustainable Buildings) 2022 (Sustainable Buildings SEPP)
- Ku-ring-gai Local Environmental Plan (KLEP) 2015.

State Environmental Planning Policy (Planning Systems) 2021

Chapter 2 of the Planning Systems SEPP identifies development that is State significant development (SSD), State significant infrastructure, critical State significant infrastructure and regionally significant development. An assessment of the proposal against the relevant provisions of the Planning Systems SEPP is provided in **Table 19**.

Table 19 | Planning Systems SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
2.1 Aims of Policy The aims of this Chapter are as follows - (a) to identify development that is State significant development	The proposed development is identified as SSD.	Yes
2.6 Declaration of State significant development: section 4.36 (1) Development is declared to be State significant development for the purposes of the Act if - (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and (b) the development is specified in Schedule 1 or 2.	The project is permissible with development consent and is development specified in Schedule 1 of the Planning Systems SEPP.	Yes
Schedule 1 State significant development – general 15 Educational establishments (1) Development that has a capital investment value of more than \$20 million.	The project is for development that has a capital investment value of more than \$20 million that is for the redevelopment of an existing school.	Yes

State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 3 of the Transport and Infrastructure SEPP simplifies and standardises the planning approval pathways for educational establishments and child care facilities, while minimising impacts on surrounding areas and improving the quality of the facilities. The SEPP specifies where these developments can be built and sets out the development and construction standards that apply. The application has been assessed against the relevant provisions of Chapter 3 of the SEPP.

Clause 3.36 of the SEPP identifies school-specific development controls applicable to school development permitted with consent, and requires the consent authority to consider the design quality principles set out in Schedule 8 of the SEPP. The application has been assessed against these provisions, including the design quality principles, and is consistent with the relevant

requirements. An assessment of the development against the design principles is provided in **Table 20**.

Table 20 | Consideration of Schedule 8 Transport and Infrastructure SEPP – Design quality principles in schools

Design principle	Consideration
Responsive to context	The configuration and siting of the proposed SIP building respond to the site's topography, the adjoining BGHF, the surrounding campus buildings, and the adjacent low-density residential dwellings along Avon Road. Stepped massing and terracing follow the natural topography to integrate the building into the landscape, while the facade materiality and articulation complement surrounding buildings, particularly the Colonnade Building. A Connecting with Country process undertaken with Konanngo Cultural Heritage Services and local Aboriginal knowledge holders has informed the landscape and architectural design, including blue gum planting, references to Hawkesbury sandstone geology, and yarning circles. The integrated landscape includes the Campus Commons, connecting the SIP to the wider campus. Substantial setbacks, retained vegetative screening and articulated terraces assist in mitigating visual impacts on adjoining residential properties (see Section 6.1 and 6.2).
Sustainable, efficient and resilient	ESD initiatives measures will be integrated throughout the proposed development, including natural cross ventilation, passive solar design and durable, low-maintenance materials to minimise reliance on mechanical heating, cooling and ventilation systems, improving energy efficiency and reducing operational costs. Extensive landscaping, including 61 replacement trees, is provided to support biodiversity, shading and cooling. The proposal also involves rainwater harvesting and reuse.
Accessible and inclusive	The project is designed to be accessible and inclusive through the provision of internal passenger lifts servicing the new SIP building, a new lift within the bridge linkage connecting to the existing Science Centre, compliant external ramps and walkways linking the SIP to the Campus Commons and main vehicular drop-off area, and accessible paths of travel throughout the new building and external landscape. The Access Report confirmed that the proposed design is capable of compliance with the Federal Disability (Access to Premises – Buildings) Standards 2010, the Building Code of Australia 2022 access provisions, and referenced Australian Standards, with further design detail to be developed at the detailed design and Construction Certificate stages.

Design principle	Consideration
	The proposal will enable use of school facilities, including the auditorium and Campus Commons, with the broader school community for activities outside of school hours.
Healthy and safe	The project would provide a safe and secure environment through the incorporation of Crime Prevention Through Environmental Design principles, including passive surveillance via glazing and the building's location within the heart of the campus, CCTV monitoring, access-controlled entries and well-lit access ways. External lighting is to be designed in accordance with AS/NZS 4282:2019 to avoid light spill onto adjoining residential dwellings along Avon Road. The design maximises natural light and ventilation through operable windows, the central atrium and skylight, and a green roof at Level 01, with retained and replacement landscaping providing shading and cooling to outdoor spaces. The site is not mapped as bushfire prone land and is not subject to mainstream flooding, with minor rainfall runoff to be managed through the proposed stormwater drainage and OSD design. The school site is well served by public and active transport, being located approximately 200m from Pymble train station and within proximity to bus services along the Pacific Highway. An existing GTP and school Travel Access Guide would encourage sustainable travel modes by staff and students, and a CTMP would mitigate conflicts between pedestrians, vehicles and construction traffic during DOPU times. The Detailed Site Investigation identified potential areas of environmental concern requiring further investigation post-demolition, and the Department has recommended conditions to reflect this requirement, and if necessary, a Remedial Action Plan to be prepared to ensure the development site is suitable for its intended educational use.
Functional and comfortable	The project would provide high quality school facilities with a variety of comfortable and engaging spaces that are accessible for a wide range of formal and informal educational and community activities. The project would not have unreasonable impacts on adjoining residential properties, screened by adjoining BGHF and with façade articulation through design to reduce perceived bulk. Appropriate indoor and outdoor learning and play spaces, access to services and adequate storage would be provided on site.

Design principle	Consideration
Flexible and adaptable	The proposal is considered consistent with the long term State strategic planning objectives and the school's Master Plan in the non-government sector to support future growth. The school design would provide adaptable learning spaces and multi-purpose facilities to meet future learning requirements.
Visually appealing	The proposed SIP building within its landscape setting is of a high quality design, with articulated built form with durable materials and a neutral to warm colour palette, following the site's topography. Subject to conditions, the Department considers that the development is contextually appropriate, minimises visual impacts and enhances the existing school and with open space and high quality design.

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 of the Resilience and Hazards SEPP relates to the remediation of contaminated land. Section 4.6 of the SEPP requires a consent authority to consider contamination and remediation in determining a development application.

A Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI) have been prepared for the development site. The PSI identified four Potential Areas of Environmental Concern (PAECs) associated with the site's historical use, including historical agricultural land use and potential uncontrolled fill, historical pesticide application, potential off-site contamination migration from nearby former service stations or dry cleaners, and potential asbestos-containing materials and lead-based paints within buildings proposed for demolition.

The DSI investigated the identified PAECs and concluded that the development site currently does not contain any chemical contaminants of concern or areas of environmental concern. The DSI recommended that an addendum sampling and analysis program be implemented under the footprints of the existing buildings nominated for demolition, which were not accessible at the time the DSI was prepared. Should contamination be identified within these footprint areas following demolition, a Remedial Action Plan (RAP) would be prepared by a suitably qualified environmental consultant in accordance with NSW EPA guidelines to ensure the site is made suitable for its ongoing educational use.

The Department has recommended conditions requiring the Applicant to undertake site investigations prior to the commencement of construction involving ground disturbance to confirm the full nature and extent of any contamination, prepared in accordance with the *Contaminated Land Management Act 1997* and EPA guidelines by suitably certified consultants, and to update and

implement the recommendations of the DSI and the unexpected finds procedure throughout the project. Should ongoing on-site management of soil or groundwater contamination be required following these further investigations, the Applicant must engage a NSW EPA-accredited Site Auditor and obtain a Section A2 Site Audit Statement, accompanied by an Environmental Management Plan, confirming the land is suitable for the proposed use prior to the commencement of operation. The Department is satisfied that, subject to the recommended conditions, the site is suitable for its ongoing use as an educational establishment, in accordance with the Resilience and Hazards SEPP.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

The Biodiversity and Conservation SEPP consolidates planning provisions relating to the protection of native vegetation, threatened species and ecological communities across NSW. Relevant chapters of the SEPP for the project are Chapter 2 (Vegetation in Non-Rural Areas) and Chapter 4 (Koala Habitat Protection).

The Department finds that the project is generally consistent with the relevant provisions of the Biodiversity and Conservation SEPP, subject to recommended conditions. Consideration of the relevant chapters of the SEPP is provided in **Table 21**.

Table 21 | | Consideration of Chapters 2 and 4 of the Biodiversity and Conservation SEPP

Relevant chapter	Consideration
Chapter 2 – Vegetation in non-rural areas	Chapter 2 applies to the clearing of native vegetation in non-rural areas of the State. The Chapter applies to the site as it is located within the Ku-ring-gai local government area and is zoned SP2 Infrastructure under the KLEP 2015. Under Chapter 2, vegetation clearing in such areas is prohibited without a permit from the relevant council. The proposal would result in the clearing of approximately 0.19ha of PCT 3136 BGHF, a CEEC under the BC Act, and approximately 0.36ha of exotic vegetation. As the clearing is associated with a SSDA, the proposed vegetation removal has been assessed through the project's revised BDAR under the BC Act. The Applicant is required to retire ecosystem credits in accordance with the Biodiversity Offsets Scheme to offset residual impacts to BGHF, and a VMP has been prepared to protect, retain and enhance the retained area of BGHF along the site's northern boundary. A detailed assessment of the project's biodiversity impacts is provided in Section 6.2. Subject to recommended conditions, the Department is satisfied that the impacts of vegetation clearing have been appropriately assessed and mitigated.

Relevant chapter	Consideration
Chapter 4 – Koala habitat protection	Chapter 4 of the SEPP encourages the conservation and management of areas of natural vegetation that provide habitat for koalas. As Ku-ring-gai is listed in Schedule 2 of the SEPP and the site is greater than 1h with no approved koala plan of management applying to the land, Chapter 4 applies to the site. A site assessment undertaken as part of the project's BDAR identified that the site contains suitable koala habitat, with 15% or more of the trees comprising regionally relevant species listed in Schedule 2 of the SEPP. However, no signs of koalas or koala occupancy (scats or scratch marks) were observed within the site, and there are no historical koala records on the property. While koala records exist within 2.5km of the site over the previous 18 years, the BDAR concluded that the site is unlikely to constitute core koala habitat given the absence of records on the property itself and the fragmented and urbanised nature of the surrounding habitat. The Department is satisfied that the proposed development is likely to have low or no impact on koalas or koala habitat, consistent with Chapter 4 of the SEPP.

State Environmental Planning Policy (Sustainable Buildings) 2022

The Sustainable Buildings SEPP aims to encourage and ensure the design, delivery and assessment of sustainable buildings. In accordance with the savings and transitional provisions set out in section 4.2 of the Sustainable Buildings SEPP, the SEPP does not apply to the project as the development application was submitted on the NSW Planning Portal but not finally determined before 1 October 2023.

Ku-ring-gai Local Environmental Plan (KLEP) 2015

The Department finds that the project is generally consistent with the relevant provisions of the KLEP 2015. Consideration of the relevant clauses of the KLEP 2015 is provided in **Table 22**.

Table 22 | Consideration of the KLEP 2015

Relevant clause	Consideration
2.3 Zone objectives and Land Use Table	The site is zoned SP2 Infrastructure (Educational Establishment) under the KLEP 2015. Development for the purpose of an educational establishment is permissible with consent in the SP2 zone. The project is consistent with the objectives of the SP2 zone, which provide for development that is ordinarily associated with the identified infrastructure use.

Relevant clause	Consideration
2.7 Demolition requires development consent	The project involves the demolition of the existing Isabel McKinney Harrison Centre, Dorothy Knox Building, John Vicars Building and Robert Vicars Building. Development consent is sought as part of this SSD application for the proposed demolition activities.
4.3 Height of buildings	The site is not subject to a maximum height of buildings control under the Height of Buildings Map. The proposed SIP building would have a maximum height of 29.68m and has been designed to respond to the existing campus topography and built form, with stepped massing and terracing to integrate with the existing school and minimise visual impact on the surrounding low-density residential area. Further details on built form and visual impact are provided in Section 6.1.2.
4.4 Floor space ratio	N/A.
5.10 Heritage conservation	The school site's southeastern boundary adjoins a Heritage Conservation Area (HCA) and several locally listed heritage items (under the KLEP 2015) are located on Pymble Avenue, which sits adjacent to the school site's southeast boundary. Three local heritage items are also located opposite the school site's northwest boundary, but not directly oppose the development site. Council and HNSW did not provide comment on the adjoining and nearby HCA and local heritage items. The Department considers that, given the vegetated corridor providing visual screening between Avon Road and the development site, and the distance between the SIP building and the HCA and heritage items on Pymble Avenue, the project would not impact on heritage values of the HCA and nearby heritage items. An Aboriginal Cultural Heritage Assessment Report submitted with the EIS identified that the site has low Aboriginal cultural heritage sensitivity and no Aboriginal objects were identified. The Department is satisfied that any potential impacts to Aboriginal heritage can be managed through the recommended unexpected finds protocol (see Section 6.4).
5.21 Flood planning	The site is not identified within a Flood Planning Area on the KLEP 2015 Flood Mapping.

Relevant clause	Consideration
	The Preliminary Flood Report lodged with the EIS confirmed that the site is not subject to mainstream flooding and the flood risk is minimal. Shallow rainfall runoff will be managed through the proposed stormwater drainage design and on-site detention. The Department is satisfied that the development is appropriately designed having regard to flood risk (see Section 6.4).
6.1 Acid sulfate soils	The development site is mapped as containing Class 5 Acid Sulfate Soils under the KLEP 2015. Acid sulfate soils are not typically present in Class 5 areas, which are mapped as a precautionary buffer to adjoining higher-class land. The Department is satisfied that the proposed excavation works will not disturb acid sulfate soils (see Section 6.4).
6.2 Earthworks	The project involves excavation of a basement level approximately 5m deep. The Department is satisfied that, subject to conditions, the proposed earthworks are unlikely to cause any detrimental effect on existing drainage patterns, soil stability, the amenity of adjoining properties, or any watercourse or environmentally sensitive area.
6.3 Biodiversity protection	Part of the site is identified as 'Biodiversity' on the KLEP 2015 Terrestrial Biodiversity Map, corresponding to the BGHF along the northern portion of the site. The proposal would result in the clearing of approximately 0.19ha of BGHF, with most of the mapped vegetation to be retained and protected under a VMP. Subject to recommended conditions, the Department is satisfied that the impacts of vegetation clearing have been appropriately assessed and mitigated through the BDAR and the Biodiversity Offsets Scheme (see Section 6.2).
6.4 Riparian land and watercourses	An unmapped watercourse identified on the KLEP Riparian Lands and Watercourses Map as 'Category 3' is located to the north-west of the site. The development footprint does not intersect the associated 10m riparian buffer.

Relevant clause	Consideration
	The Department is satisfied that the proposal will not have an adverse impact on riparian land or watercourses.
6.5 Stormwater and water sensitive design	A Water Management Plan and stormwater drainage design were provided with the EIS, incorporating water sensitive urban design principles. Stormwater runoff would be managed through grading pavements away from building entrances and discharge to the existing stormwater network, with 2 OSD tanks proposed to manage peak flows. The Department is satisfied that the proposed stormwater management system incorporates reasonable measures to avoid and mitigate adverse impacts on adjoining properties, native bushland and waterways, consistent with the objectives of Clause 6.5.

Other matters

In accordance with section 2.10 of the Planning Systems SEPP, Development Control Plans do not apply to SSD. Regardless, objectives of relevant controls under the Ku-ring-gai Development Control Plan 2015, where relevant, are considered in **Section 6**.

Appendix E – Recommended instrument of consent

www.planningportal.nsw.gov.au/major-projects/projects/pymble-ladies-college-secondary-innovation-precinct