



New South Wales Government
Independent Planning Commission

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Pymble Ladies' College Secondary Innovation Precinct

SSD-79146716

Statement of Reasons for Decision

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Juliet Grant

20 July 2026

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1. Introduction

1. On 18 June 2026, the NSW Department of Planning, Housing and Infrastructure (**Department**) referred the State significant development (**SSD**) Application SSD-79146716) (**Application**) from Pymble Ladies College (**Applicant**) to the NSW Independent Planning Commission (**Commission**) for determination.
2. The Application seeks approval for the construction of a Secondary Innovation Precinct (**SIP**) within the Pymble Ladies' College (**PLC**) campus (the **Project**) located in the Ku-ring-gai Local Government Area (**LGA**) under section 4.38 of the EP&A Act. The Application constitutes SSD under section 4.36 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**) as it satisfies the criteria under section 15(2) of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (**SEPP Planning Systems**).
3. In accordance with section 4.5(a) of the EP&A Act and section 2.7 of the SEPP Planning Systems, the Commission is the consent authority as Ku-ring-gai Council (**Council**) objected to the development.
4. Andrew Mills, Chair of the Commission, determined that Clare Sykes (Chair) and Juliet Grant would constitute the Commission for the purpose of exercising its functions with respect to the Application.
5. The Department concluded in its Assessment Report (**AR**) dated June 2026 that the Project is in the public interest and approvable, subject to conditions.

2. The Application

6. The Project is proposed to be constructed at the central-western side of the PLC campus, at 20 Avon Road, Pymble.
7. The PLC campus has a total area of 20 hectares (**ha**), and the development area (the **Site**) is 10,856 square metres. The campus currently comprises multi-storey school buildings, sports facilities, internal access roads, car parking, landscaped gardens, a riparian corridor and existing native vegetation, including Blue Gum High Forest (**BGHF**) and Sydney Turpentine Ironbark Forest. To the west is detached, low density residential development along Avon Road, while a golf course is located at the southern boundary of the campus (**Figure 1**).
8. The Site is zoned *SP2 Infrastructure* under the *Ku-ring-gai Local Environmental Plan 2015* (**KLEP 2015**), and educational establishments are permissible with consent in the SP2 zone.
9. The Project comprises:
 - demolition of four existing school buildings (refer to **Figure 2**);
 - removal of 127 trees (including 61 low retention priority trees, 56 medium retention priority trees and 10 high retention priority trees);
 - earthworks, including excavation of a basement level and integrated onsite water detention;
 - construction and operation of a new six-storey school building (refer to **Figure 3** and **Figure 4**), including:
 - general learning areas (GLAs);
 - specialist science, engineering and mathematics (STEM) facilities; and
 - food and beverage, amenities and storage facilities;

- landscaping works, including a hardstand amphitheatre and planting of 61 new trees;
 - pedestrian access paths; and
 - reduction of ten visitor and staff carparking spaces during construction with five of those spaces to be reinstated (net loss of five staff carparking spaces);
10. A complete description of the Project can be found in **Table 2** of the Department's AR.
11. The Project is proposed to be constructed in a single stage over a 24-month period, and the school is proposed to remain operational during construction.
12. The Project has an estimated development cost (EDC) of \$99,674,252 and is expected to generate up to 115 construction jobs. No change is proposed to total student numbers, staff numbers, school use or hours of operation.

Figure 1 – Local context plan and location of the Site (source: Department's AR Figure 2, from Applicant's EIS 2025)



Figure 2 – Existing buildings proposed for demolition (source: Department's AR Figure 6)

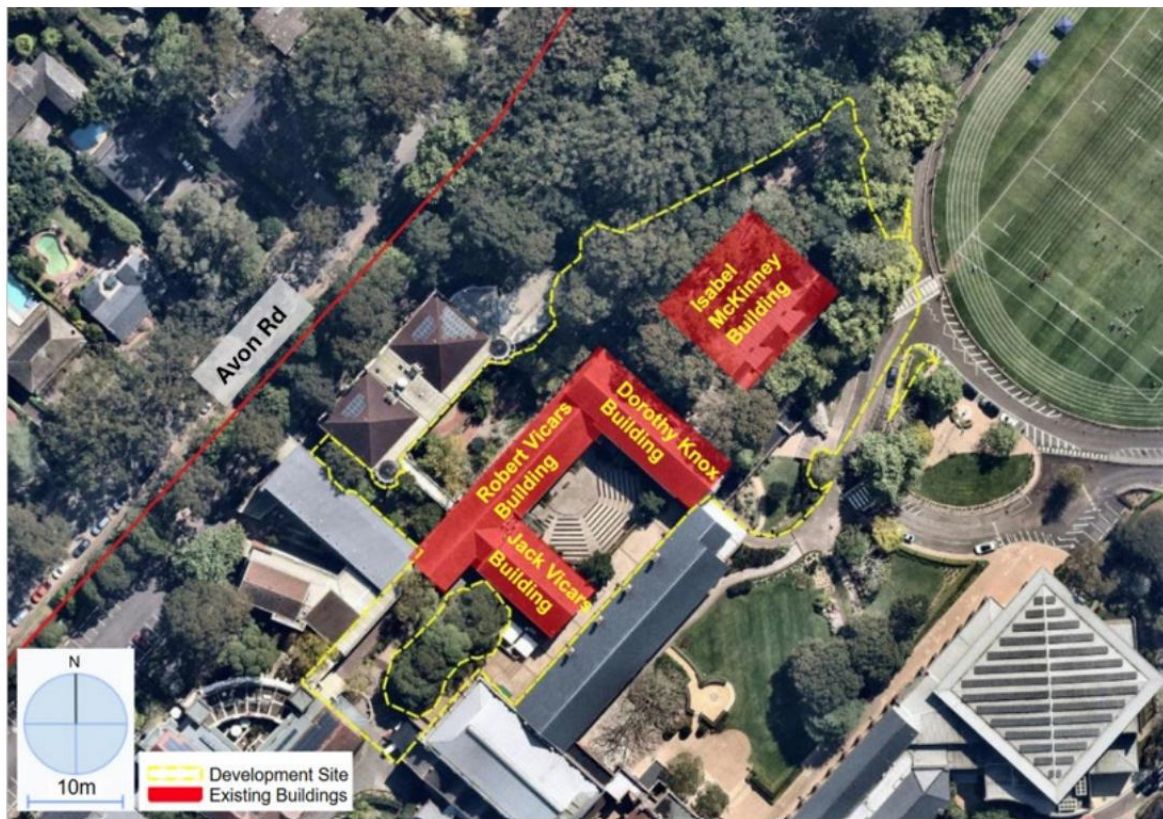


Figure 3 – Site layout plan (source: Department's AR Figure 14)

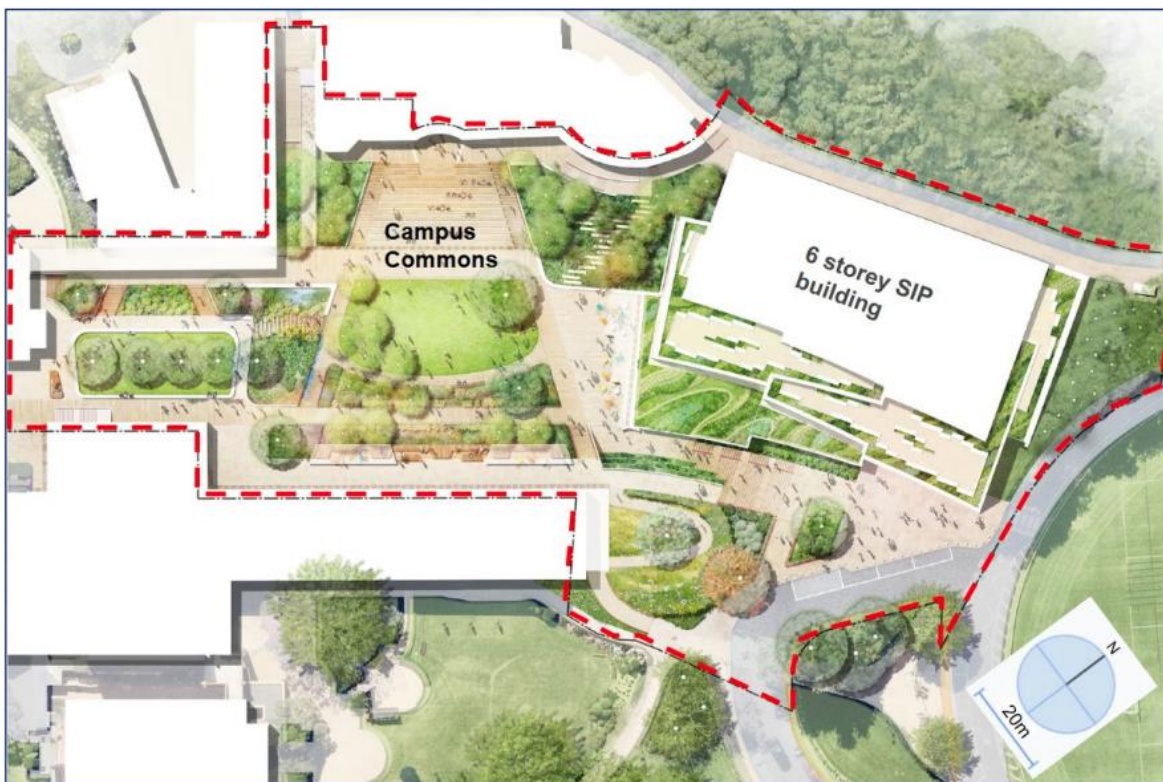


Figure 4 – Aerial view render perspective looking north-east over the Site (source: Department's AR Figure 23, from the Applicant's RFI Response 2026)



3. Material Considered by the Commission

13. In this determination, the Commission has given consideration to the:
- matters raised in public submissions received by the Commission as set out in section 4;
 - material and planning framework as set out in [Appendix A – Commission's Considerations](#); and
 - Department's whole-of-government assessment as set out in [Appendix B – Department's Assessment Report](#).
14. The Department's whole-of-government assessment of the Project was undertaken in consultation with five government agencies, including Transport for NSW (TfNSW); Heritage NSW; NSW Rural Fire Service (NSW RFS); Fire and Rescue NSW (FRNSW); and Conservation Programs, Heritage and Regulation Group (**CPHR**) of the NSW Department of Climate Change Energy, the Environment and Water (**DCCEEW**). Several of these agencies provided comments on the Application, and none objected to the Application. Council objected to the Application and provided detailed submissions to the Department. The Commission has considered all of this material in making its determination.

4. Public Consultation

15. The Department exhibited the Application between Tuesday 8 July 2025 and Wednesday 6 August 2025 and received two public submissions, both of which objected to the Project. Chapter 5 of the Department's AR outlines how these submissions were taken into consideration in its assessment.

16. The community was offered the opportunity to make written submissions to the Commission from Thursday 18 June 2026 to Sunday 5 July 2026. The Commission received a total of one written submission objecting to the Application.
17. The objection to the Commission raised a number of matters which principally relate to the scale of the Project and its environmental footprint. These matters are summarised below:
 - the removal of trees and subsequent loss of mature tree canopy and fragmentation of biodiversity corridors;
 - the bulk and scale of the building and its incompatibility with the adjoining established low density residential neighbourhood, resulting in unacceptable overshadowing and privacy impacts to adjacent residential properties;
 - the construction of the Project and impacts to adjoining residences and users of the school, particularly regarding noise and dust pollution, and safety (particularly in relation to school drop off and pick up times).
 - the need for the exploration of alternative design options that reduce bulk and scale and minimise tree loss.
18. The Commission held meetings with the Applicant on Thursday 25 June 2026 and with the Department and Council on Thursday 2 July 2026. The Commission also inspected the Site on Thursday 25 June 2026. During its meeting with the Commission, Council reaffirmed its position as objecting to the Application and transcripts from these meetings are publicly available on the Commission's website.

5. Reasons for the Decision

19. The Commission has decided to grant consent to the Application, subject to the imposed conditions. The Commission's decision has been informed by the mandatory considerations under section 4.15 of the EP&A Act, including but not limited to submissions made in respect of the Application. The Commission's key reasons for its decision are set out below.
20. The Project is consistent with the State's strategic planning framework, which seeks to ensure that education infrastructure delivers fit-for-purpose and future-focused schools. By upgrading the senior student facilities within the existing PLC campus, the Project supports the efficient use of established educational infrastructure and enhances opportunities for contemporary teaching and learning. The Project also aligns with Council's local strategic planning framework by delivering a well-planned and appropriately located education facility.

Built form

21. The Project's built form and landscape design respond appropriately to the Site's constraints, including its steep topography and existing environmental features. The architectural design is sympathetic to the established scale and character of the PLC campus, particularly in its relationship with the neighbouring Main Colonnade Building. The Project's height, massing and siting are appropriate within the context of the surrounding BGHF. It has been carefully designed to minimise visual impacts using articulated façades, stepped building forms and suitable setbacks. The Project will provide an appropriate transition between the school campus and the adjoining residential area on the western side of Avon Road and will maintain the landscaped character of the locality. The Project will not result in unreasonable impacts to neighbouring properties along Avon Road and is unlikely to be perceived as visually intrusive, in part due to screening provided by the established BGHF.

Biodiversity impacts

22. The Project has been designed to avoid, minimise and mitigate impacts on biodiversity, including BGHF, through site design, vegetation retention, replacement planting, biodiversity offsets and ongoing management measures, as set out in the following paragraphs. Having considered the SAI two-step assessment process, the Commission is satisfied that the residual impacts are unlikely to contribute significantly to the risk of extinction of BGHF in the Sydney Basin Bioregion and therefore are not likely to result in a serious and irreversible impact.
23. The Project will result in the removal of 0.19 ha of BGHF and 0.36 ha of exotic and non-native vegetation, including 127 trees, of which 10 have been identified as having a high retention priority. The Project has been designed to retain eight trees within the development footprint. The landscaping strategy includes the planting of 61 replacement trees and 26 tree ferns, with a focus on BGHF species.
24. Biodiversity impacts have been minimised through the Project's siting, design and mitigation measures, with impacts confined to an area of the PLC campus comprising existing buildings, planted vegetation and the "disturbed edge" of the BGHF (see page 68 of the revised Biodiversity Development Assessment Report (**BDAR**), dated October 2025). To minimise impacts on BGHF, and to address concerns raised by Council and CPHR, the Applicant amended the landscape design during the Response to Submissions (**RtS**) phase of the Application's assessment and has proposed a range of avoidance, mitigation and ongoing management measures, as detailed in the revised BDAR, revised Arboricultural Impact Assessment (AIA), and the revised Vegetation Management Plan (VMP). These measures include weed suppression, enrichment planting, hydrological buffering, erosion control, and monitoring of edge stability of the retained BGHF to ensure its long-term preservation. Additionally, the Applicant considered alternative design options during the RtS phase, which CPHR confirmed satisfactorily addressed its concerns.
25. BGHF is a Serious and Irreversible Impact (**SAII**) entity under the *Biodiversity Conservation Act 2016* (**BC Act**), and consistent with the Biodiversity Assessment Method (BAM), the Applicant has assessed the Project's impacts and identified a requirement to retire three ecosystem credits through the Biodiversity Offsets Scheme (BOS).
26. In undertaking its assessment, the Applicant considered the Department's 2019 SAI guideline – *Guidance to assist a decision-maker to determine a serious and irreversible impact* (DPIE, 2019). The Commission notes that the NSW Government's updated guideline – *Guidance on serious and irreversible impacts* (DCCEE, 2026) – was published after the preparation of the BDAR and revised BDAR. The Commission has nevertheless given consideration to the 2026 guideline in making its determination, including the 'two-step process' for identifying and determining serious and irreversible impacts. The SAI test requires:
 - *Step 1*: the identification of the threatened species or ecological community – in this instance, "Blue Gum High Forest in the Sydney Basin Bioregion", as identified by the Applicant's revised BDAR (section 8.4), dated October 2025; and
 - *Step 2*: consideration of whether the residual impact is likely to contribute significantly to the risk of extinction of the ecological community. After considering the *Biodiversity Conservation Regulation 2017* (BC Regulation) principles, the scale and condition of the affected vegetation, the effectiveness of avoidance and minimisation measures, retention of the core BGHF corridor, limited cumulative impacts, and negligible increase in fragmentation, the Commission finds that the Application is unlikely to contribute significantly to the risk of extinction of BGHF in

the Sydney Basin Bioregion and therefore is not considered likely to result in a serious and irreversible impacts.

27. The Commission acknowledges that Council maintains its objection to the Project's biodiversity impacts (and specifically, the proposed removal of trees T61, T71 and T85). However, subject to the retirement of the required credits and implementation of the proposed biodiversity management measures, the Commission is satisfied that the Project's impacts on biodiversity, including the SAI entity, have been appropriately avoided and minimised and are acceptable, and remaining impacts can be appropriately managed through the imposed conditions of consent.

Traffic and carparking

28. The Project will not increase the approved number of staff or students on campus. Existing parking arrangements will be modified during construction and result in a net loss of five on-site parking spaces upon completion. The operational traffic and parking impacts of the Project will be minor, notwithstanding the loss of five parking spaces, and can be appropriately managed through the imposed conditions of consent.
29. The Department notes that the temporary construction parking arrangements would be dependent on achieving construction worker mode share targets and the effective operation of tandem parking arrangements (AR para 158). The Commission agrees with the Department that the temporary parking impacts associated with construction are acceptable. Subject to the implementation of the Construction Traffic Management Plan (CTMP), as required by the imposed conditions of consent, construction related impacts can be effectively managed and are not expected to result in unacceptable impacts on the surrounding road network or local amenity.

Council's submission

30. The matters raised by Council – including in its submissions to the Department and during its meeting with the Commission on 2 July 2026 – have been appropriately addressed or mitigated by design refinements, and any residual issues can be appropriately managed through the conditions of consent imposed by the Commission.

The Commission's findings

31. Overall, the Commission finds:
- the Project is permissible with consent and is consistent with the objectives of the *SP2 Infrastructure (Educational Establishment)* zone under the KLEP 2015;
 - the Project demonstrates consistency with the State's strategic planning framework by providing contemporary education infrastructure within an established school and will support high-quality and innovative teaching and learning opportunities;
 - the Project has been designed to respond appropriately to the Site's environmental constraints, including its topography, existing vegetation and ecological values, while maintaining a suitable relationship with adjoining land uses;
 - the SIP building represents a refined architectural response to the Site and will improve the amenity and functionality of the school campus;
 - the new landscaped area (Campus Commons) will provide a high-quality open space with enhanced amenity, accessibility and opportunities for passive recreation, teaching and learning;

- impacts on the BGHF, and on trees identified with high ecological significance, have been avoided as far as practicable and minimised through design refinements, with residual impacts capable of being satisfactorily offset and managed through the imposed conditions of consent;
 - the Project's construction and operational traffic, parking and access impacts would be limited and can be effectively managed through the mitigation measures required by the imposed conditions of consent;
 - other construction-related impacts, including noise and amenity impacts, can be appropriately managed through the imposed conditions of consent; and
 - the Project will deliver public benefits, including improved educational facilities for current and future students and the generation of up to 115 construction jobs.
32. The Commission finds that the Application meets all necessary legal requirements, including the mandatory considerations under section 4.15 of the EP&A Act; it is consistent with NSW Government policies; and its approval supports the public interest in providing a high-quality education facility. The Commission has therefore determined to approval the Application subject to the conditions of consent in [Appendix C – Instrument of Consent](#).
33. The reasons for the Decision are given in the Statement of Reasons dated 20 July 2026.



Clare Sykes (Chair)
Member of the Commission



Juliet Grant
Member of the Commission

Appendix A – Commission’s Considerations

Material considered by the Commission

Appendix B – Table 1: Material considered by the Commission

Document	Date
Secretary’s Environmental Assessment Requirements (SEARs)	16 January 2025
Applicant’s Environmental Impact Statement and its accompanying appendices	19 June 2025
Government agency advice to the Department	Various
Public submissions made to the Department during exhibition	Various
Applicant’s Response to Submissions Report and its accompanying appendices	18 December 2025
Department’s Assessment Report and recommended conditions of consent	Received by the Commission on 18 June 2026
Observations made at the Site Inspection	25 June 2026
Comments and presentation material from meetings with:	
• Applicant	25 June 2026
• Council	2 July 2026
• Department	2 July 2026
All written submissions made to the Commission up until	5 July 2026
Department’s advice to the Commission regarding the imposition of conditions	15 July 2026

Planning Framework

Appendix B – Table 2: Strategic and Statutory context

Strategic context	Commission’s consideration
Greater Sydney Regional Plan, 2018 (GSRP)	The GSRP provides a vision for Sydney to 2056 and informs planning across five districts, including the Northern District. The Commission finds that the Project contributes to several objectives of the GSRP, including: • Objective 1 – infrastructure supports the three cities; • Objective 2 – infrastructure aligns with forecast growth; • Objective 6 – services and infrastructure meet communities’ changing needs; and • Objective 7 – communities are healthy, resilient and socially connected. The Project will deliver education infrastructure, thereby contributing to the GSRP’s objectives for liveability and infrastructure alignment.
North District Plan, 2018 (NDP)	The NDP is a long-term strategic framework that guides land use, housing, transport, infrastructure and environmental planning across nine local government areas in Sydney’s Eastern Harbour City. Its aim is to support population growth while maintaining the district’s liveability, productivity, sustainability, unique character and heritage. The Project supports <i>Planning Priority N3</i> – “Providing services and social infrastructure to meet people’s changing needs.” By delivering education infrastructure, the Project aligns with the NDP’s vision for a liveable, productive and sustainable city, helping meet future educational needs, support community wellbeing and create connected, vibrant places.

Ku-ring-gai Local Strategic Planning Statement (Ku-ring-gai LSPS)	The Ku-ring-gai LSPS plans for the LGA's economic, social and environmental land use needs for the 20 years between 2016 and 2036. The LSPS provides a vision for Ku-ring-gai with an emphasis on jobs, homes and infrastructure and identified priorities for the local community. The Project aligns with the LSPS's vision by providing well-planned education infrastructure which supports liveability outcomes, including: • <i>Local Planning Priority K1: Providing well planned and sustainable local infrastructure to support growth and change; and</i> • <i>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.</i>
Our Ku-ring-gai: Growing together, Community Strategic Plan, 2035 (Community Strategic Plan)	The Community Strategic Plan is the long-term strategic plan for the future of the Ku-ring-gai LGA and identifies that access to quality education, desirable housing, the natural environment and transport infrastructure continue to attract new residents to the area. The Project is consistent with the Community Strategic Plan's vision for Ku-ring-gai.
A New Approach to Strategic Planning: Discussion Paper, December 2025 (Discussion Paper)	The Discussion Paper forms part of the NSW Government's steps toward a more streamlined strategic planning framework that aims to: • reduce duplication across the strategic planning system; • align housing, jobs and infrastructure planning; • support councils with clearer guidance and direction; and • make planning priorities and policies easier to navigate and implement. The Discussion Paper proposes a three-tier structure for land use priorities – State, Regional and Local – with a new State Land Use Plan that would set land use priorities to guide planning at each level. The Project would not result in any inconsistencies with the State's proposal to improve the strategic land use planning framework.
Statutory context	Commission's consideration
Objects of the EP&A Act and Ecologically Sustainable Development	The Commission has considered the Objects of the EP&A Act and is satisfied that the Application is consistent with those Objects. The Commission finds that the Application is consistent with ESD principles and would achieve and acceptable balance between environmental, economic and social considerations.
Permissibility	The Site is zoned <i>SP2 Infrastructure (Educational Establishment)</i> under the KLEP 2015. Educational establishments are permissible with development consent in the SP2 zone. Pursuant to Part 3.4 of <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> the SP2 zone is a 'prescribed zone' where development for the purpose of school is permitted with development consent.
State significant development	The Application comprises development for the purpose of erection of a building within an existing school that has an estimated development cost of more than \$50 million. As such and pursuant to section 4.36 of the EP&A Act, the Application is SSD as it satisfies the criteria under section 2.6(1) and item 15(2) of schedule 1 of SEPP Planning Systems.
Consent authority	In accordance with section 4.5(a) of the EP&A Act and section 2.7(1) of SEPP Planning Systems, the Commission is the consent authority as the Department received a submission from the local Council objecting to the Application.

Amended application	Pursuant to section 37 of the <i>Environmental Planning and Assessment Regulation 2021 (EP&A Reg)</i> , a development application can be amended at any time before its determination. Following Council's submission to the Department, the Applicant sought to amend the Application by replacing the proposed vertical rooftop plant louvres with a lighter coloured finish. This amendment was agreed to by the Department and is detailed in Table 17 of the AR.
Other approvals and authorisations	Pursuant to section 4.41 of the EP&A Act, several approvals are integrated into the SSD process and therefore not required to be separately obtained for the Project. Pursuant to section 4.42 of the EP&A Act, further approvals that may be required cannot be refused and must be substantially consistent with the development consent for the Project. The Department has consulted with government agencies during its assessment process and considered the advice received. Relevant recommended conditions of development consent are subsequently included in the Department's draft conditions (AR para 60).
Mandatory considerations	Commission's consideration
Relevant environmental planning instruments (EPIs)	Appendix D of the AR identifies relevant EPIs for consideration. The key EPIs (in their present, consolidated form) include: • <i>State Environmental Planning Policy (Planning Systems) 2021</i>; • <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>; • <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>; • <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>; • <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>; and • <i>Ku-ring-gai Local Environmental Plan 2015</i>. The Commission has considered these EPIs as part of its determination.
Relevant DCPs	Pursuant to section 2.10 of the SEPP Planning Systems, DCPs do not apply to SSD.
Any planning agreement or draft planning agreement	The <i>Ku-ring-gai Council Section 7.12 Local Infrastructure Contributions Plan 2023</i> applies to the Project 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 Commission has imposed Condition B8 requiring the Applicant to pay to Ku-ring-gai Council the levy as imposed under section 7.12 of the EP&A Act.
Relevant matters prescribed by the EP&A Reg	The Commission has considered matters relevant to the Application, including Australian Standard AS 2601—2001: <i>The Demolition of Structures</i> as prescribed by the EP&A Reg.
Likely impacts of the development	The Commission has considered the likely impacts of the development as set out in Section 5 of this Statement of Reasons for Decision.
Suitability of the Site for development	The Site is suitable for the following reasons: • it is zoned SP2 Infrastructure and is an existing educational establishment; • the scale of the Project is consistent with existing development on the Site; • the Site's existing vegetation and tree cover provides suitable screening at the boundary interface of the Site; • the Site is serviced and the project is an orderly and economic use of the land;

	• impacts on surrounding land uses have been minimised where possible, with remaining impacts capable of being mitigated through conditions of consent.
The public interest	The Commission has considered the public interest in deciding to grant conditional consent to the Application. In doing so, the Commission has evaluated the likely impacts of the Application and considered the relevant ESD principles. The Commission has concluded that the Project will support the public interest by providing upgraded school facilities and thereby improved educational opportunities.

Appendix B – Department's Assessment Report

[Link to Department's Assessment Report, dated June 2026](#)

Appendix C – Instrument of Consent

[Link to Instrument of Consent, dated 20 July 2026](#)



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