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11 October 2022

Dear Andre

Subject: Pymble Ladies' College Grey House Precinct - Request for information from IPC

We refer to your email dated 5 October 2022, which seeks our response to a request from the Independent Planning Commission (IPC) dated 4 October 2022 for additional information relating to our social impact assessment report for the above development application. Thank you for forwarding this request to HillPDA for consideration and a response.

Background

We understand that the Social Impact Assessment report prepared by HillPDA for the Grey House Precinct proposal at Pymble Ladies' College (PLC) dated 26 August 2021 (the SIA report) was submitted to DPE as part of PLC's State Significant Development Application (SSDA).

The DPE Assessment Report dated August 2022 concurred with the conclusion of the Social Impact Assessment, finding:

"The Department is satisfied that the proposal would have positive social impacts as it would meet the educational needs of the area."

and

"Short term impacts arising from the construction phase would be mitigated through recommended conditions requiring construction management plans."

The SSDA was subsequently referred to the IPC who have requested clarifications as follows:

- (a) Further assessment of how magnitude levels for predicted social impacts (for both construction and operation) have been determined regarding consideration of magnitude dimensions: extent, duration, severity or scale, intensity or importance and level of concern/interest.
- (b) Comments outlining how likelihood levels have been defined, specifically for impacts on adjacent neighbours, noting that proximal neighbourhood impacts have been defined as 'possible' and that wider community benefits have been defined as 'almost certain'
- (c) Comments on any residual impacts on neighbours and how these will be managed outside of the standard mitigation strategies proposed.



HillPDA is committed to providing a high-quality assessment of social impacts to arise from the proposed development and are pleased to provide additional information to assist the IPC with its assessment of the SSDA.

We have considered each of the matters raised by the IPC and DPE and have provided our response to each item below.

Response to Item (a) - Magnitude levels

The method applied in the SIA report to evaluate social impacts was consistent with the *Draft Social Impact Assessment Guideline for State Significant Projects* (the Draft Guideline) which was in place at the time of writing. The final guideline was published by DPE in October 2021, after the SSDA was lodged. We continue to apply the method in the Draft Guideline.

The IPC will be aware that the assessment of social impacts involves an element of subjectivity. The Draft Guideline stating:

"The ratings of likelihood and magnitude – and therefore overall significance – typically have both subjective and objective components, as this will depend on people's individual experiences and/or perceptions as well as technical evaluations."¹

Our assessment of magnitude and overall significance have been made having regard for the research findings outlined in the SIA Report and the author's qualification and experience, which satisfy the requirements of the Draft Guideline.

The magnitude of a potential impact is a key consideration to determine a risk rating. In determining the magnitude of a potential impact there are five key characteristics that must be considered, these are defined in the table below which also appears in section 2.2 of the SIA report.

Characteristic	Details needed to enable assessment
Extent	Who specifically is expected to be affected (directly, indirectly, and/or cumulatively), including any vulnerable people? Which location(s) and people are affected? (e.g. near neighbours, local, regional, future generations).
Duration	When is the impact expected to occur? Will it be temporary or permanent?
Severity or scale	What is the likely scale or degree of change?
Sensitivity or importance	How sensitive/vulnerable or adaptable/resilient are affected people to the impact, or (for positive impacts) how important is it to them?
Level of concern/ interest	How concerned or interested are people?

Table 1: Characteristics of social impact magnitude

We have inserted our assessment of magnitude, for each of the above characteristics, into the schedule of social impacts that was provided in the SIA report. Appendix A reproduces the impacts from the SIA report with the evaluation of magnitude stated in terms of extent, duration, severity or scale, sensitivity or importance and level of concern. No changes have been made to the overall significance ratings and these remain as stated in the SIA report. We trust this more clearly indicates how magnitude was considered in the determination of overall social impacts.

Response to Item (b) – clarification of 'likelihood' ratings

The IPC has sought clarification as to how 'likelihood' levels have been defined, specifically for impacts on adjacent neighbours, noting that proximal neighbourhood impacts have been defined as 'possible' and that wider community benefits have been defined as 'almost certain.'

¹ DPE (2021, p. 12), SIA Guideline Technical Supplement

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Likelihood refers to the probability that a given activity would impact identified with a social dimension. The approach to identifying the likelihood levels of an impact occurring is shown in the table below, which is reproduced from section 2.2 of the SIA report. These definitions of likelihood levels are consistent with the Draft Guideline including the indicative probability rankings (which are no longer included in the Social Impact Assessment Guideline).

Table 2: Defining likelihood

Likelihood	Description	Indicative probability
Almost certain	Definite or almost definitely expected (e.g. has happened on similar projects)	Greater than 90 per cent
Likely	High probability	70 per cent
Possible	Medium probability	50 per cent
Unlikely	Low probability	30 per cent
Very unlikely	Improbable or remote possibility	Less than 10 per cent

As noted by the IPC, HillPDA has rated the likelihood of impacts in the proximal neighbourhood, such as impacts from construction activities have a "possible" probability of impacting surrounding residents' peace or quiet enjoyment of their surroundings (loud or dusty activities). We have determined these impacts to be "possible" rather than "likely" because:

- The SIA report only assesses impacts to arise from the proposed development. Any existing conditions, such as noise or traffic congestion, are only relevant as baseline conditions from which the change in impacts must be considered.
- The proposed development would replace existing temporary (demountable) teaching spaces, and is therefore unlikely to lead to any significant change in the social environment, once operational. In particular, the findings of the acoustic assessment by Pulse White Noise Acoustics Pty Ltd that "analysis of noise from internal areas such of the proposed development as well as noise associated with external play areas and the use of the public address system have been assessed and suitable acoustic building constructions and operational controls to mitigate noise emissions resulting from the development are detailed in this report." Similarly, the Traffic impact assessment by Stantec noted that as the proposal is for the use of existing staff and students the only additional traffic would be generated by the Early Learning Centre (ELC), stating "it is unlikely that all 90 children will contribute to generating additional traffic. Nevertheless, the additional traffic calculated based on the RMS rates have been adopted for the SIDRA model which indicates that the proposed development will have no adverse impact on the existing performance levels of Pacific Highway/ Livingstone Avenue and Pacific Highway/Beechworth Road intersections."
- Having reviewed the various technical report and outcomes from stakeholder engagement, HillPDA considers that the likelihood of impacts occurring in the proximal neighbourhood from construction are considered to be "likely."
- However, the implementation of proposed mitigations (including a Construction Transport Management Plan and accompanying mitigations to manage construction activities times), will significantly reduce the likelihood of these activities producing a social impact, owing to the lessened duration of work and monitor of activities to adaptively manage the construction process.
- Owing to the proximity of sensitive receivers nearby, it is not considered that the likelihood of any social impact arising completely removed and that it remains possible that impacts (e.g. noise and disruption) may be experienced during the process (particularly during the times when construction is being undertaken). For that reason, the likelihood rating, with mitigation, has been evaluated as "possible," indicating a medium probability that the impact would be experienced.



In comparison, we have concluded that potential benefits of the proposed development to the wider community are 'almost certain' because:

- The proposed development will offer a significant improvement in accommodation for students and staff, potentially leading to better educational and pastoral experiences
- The school already makes its facilities available to the wider community including sports fields, swimming pool, theatre, classrooms for interschool competitions and meetings. The proposed development will enhance the offer at the school, and in doing so, will enhance the facilities available to the wider community
- In particular, the proposal will deliver suitable spaces for dance academy, out of school hours care and early learning spaces which will be open to the wider community (per section 5.5 of the Operational Plan)
- Provided the development is built, the risk of the above benefits not being realised by the wider community is small, since the school has already proven it successfully facilitates community use of the school's facilities
- Given this small degree of risk, a likelihood rating of 'almost certain' is appropriate.

Having reconsidered the likelihood ratings in the SIA report, HillPDA stands by and reaffirms its assessment of overall social impacts.

Response to item C – residual impact to neighbours

The IPC has requested comments on any residual impacts on neighbours and how these will be managed outside of the standard mitigation strategies proposed.

The SIA report provided a range of mitigations, which if implemented, would minimise substantive residual negative impacts to surrounding properties. The residual impacts that may potentially affect surrounding neighbours were identified as:

- Reduced access and amenity for local residents, particularly on Avon Road and Pymble Avenue, during construction
- Noise and dust impacts for local residents, particularly on Pymble Avenue, and for on-campus boarders during construction
- Potential overshadowing effects for residents on Pymble Avenue following completion.

Construction impacts are by nature disruptive in a range of ways, however as noted in the SIA report, these impacts can be managed by effective planning and coordination of building activities through the Project Management Plan, Construction Management and Transport Plan and open communication with potentially affected stakeholders within the school and its surrounds. Adaptive monitoring and management is a key part of this planning and may include monitoring of noise levels, outdoors and dust as required.

While the Visual Impact Assessment (VIA) included measures to minimise operational impacts to privacy and overall bulk, the very nature of the change in built form would result in a change or impact to the surrounds of the immediate residences. It should be noted. VIA proposes natural screening, proposing significant plantings to screen the proposal from surrounding residences to mitigate this.

No other residual operational impacts were identified, however the report advocates an adaptive approach to social impact management. Chief amongst these tools will be a clear process for managing activity during construction and operation, including a transparent complaints management process. Potential noise disruption can be further managed through monitoring equipment, which can further assist in minimising noise impacts during construction. The school is well set up to manage such a process, having strong community connections and offering a single point of contact.



The school already has in place a system where by residents can notify the school, at any time, of an incidents or express their concerns. The school has an established and continuing connection with the wider community and endeavours to act with regard to maintaining that relationship. This will be reinforced prior to and during construction, as referenced in Section 6.9 the EIS:

"A clear communications process should be established for stakeholder engagement and in relation to construction activities, which identifies the nature of activities requiring surrounding residents to be notified, nominates a point of contact for issues or complaints and establishes a resolution process."

This would include:

- Advising neighbours of the construction timeframes
- Providing contact details to occupants of neighbouring residents
- A nominated liaison officer who is available 24/7 to receive complaints and provide information
- Responding to complaints and if required, referring the matter to the relevant authorities.

Having considered the various matters above, HillPDA remains of the opinion that the negative impacts of the proposal can be successfully managed with appropriate mitigation measures and the proposal would have an overall benefit to the social environment.

Should you have any questions concerning the above please do not hesitate to contact us on (02) 9252 8777.

Sincerely

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Appendix A: Detailed evaluation matrix

Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
Way of life	Peace or quiet enjoyment of nearby dwellings by surrounding residents may be impacted while some construction activities are being carried our (loud or dusty activities)	 Implementation of a Construction Management Plan, which will include: Measures to minimise the length of time of disruptive activities and restrict the times in which they can occur Measures to mitigate the severity of construction activity (on site sound metering, water suppression or covering of dusty materials) 	Possible	Surrounding residents	Temporary (work hours during construction phase)	Moderate – disruptions could be intense at certain phases of construction	Moderate – The impacts could be felt in nearby residences during work hours, disrupting quite enjoyment of one's home. No highly vulnerable receivers have been identified as being impacted.	High – consultation has identified high interest amongst some adjoining residents	Moderate	Medium
	Increased scale of structures on campus may impact upon surrounding residents sense of privacy	 Implementation of recommendations of VIA, particularly undertaking landscaping and screen planting along the southern boundary adjacent to properties 59B, 57A and 53 Pymble Ave, in consultation with property owners. It is recommended that semi- mature evergreen tree planting of at least 700L 	Possible	Surrounding residents	Permanent	Mild – with appropriate screening described in mitigations the impact is considered to be mild	Low – the potential effects are not deemed to impact any sensitive receivers; no highly vulnerable receivers have been identified as being impacted.	High – consultation has identified high interest amongst some adjoining residents	Minor	Medium



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
		pot size be planted at close intervals and that proposals are discussed with adjoining property owners.								
	The routine utilisation of some nearby parks may vary due to the reduced amenity.	 Ensure that access and construction management plan sufficiently considers amenity impacts on nearby parks. 	Low	School community, local residents	Temporary – short term (construction phase)	Mild – with mitigations in place	Low. No highly vulnerable groups have been identified as being impacted.	Low – engagement has not identified concern on this matter	Minimal	Low
	Improved amenity from new facilities, including the Early Learning Centre, Dance Academy and OSHC holiday care program.	• None required	Almost certain	School community, broader local community	Permanent	Moderate – affects the existing and future school community and school staff	Low. No highly vulnerable groups have been identified as being impacted.	Moderate – the school community has an interest in improved facilities. Improved ELC places are important to staff.	Minor positive	Medium positive
Community	Potential positive impacts to community cohesion through increased access to employment and economic activity.	None required	Possible	Broader local community	Permanent	Mild – effects would be diffuse in nature	Low. No highly vulnerable groups have been identified as being impacted.	Low – engagement has not identified specific aspirations on this matter	Minimal positive	Low positive
Com	Improved community cohesion through additional facilities located within the proposal, with the Early Learning	 Existing school policies should be updated to incorporate appropriate management procedures for proposed community 	Possible	Broader local community	Permanent	Mild – effects would be diffuse in nature	Low. No highly vulnerable groups have been identified as being impacted.	Low – engagement has not identified specific	Minimal positive	Low positive



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
	Centre, Dance Academy and OSHC holiday care program to be made available to the community.	access arrangements to the new facilities.						aspirations on this matter		
	Improved access to facilities to be offered within the proposal when completed, including the Early Learning Centre, Dance Academy and OSHC holiday care program.	 Completion of an accessible pathway from Centenary Car Park Implementation of recommendations of TIA to encourage use of Centenary Car Park and existing drop off and pickup facilities over Pymble Avenue. 	Almost certain	School community, local residents, broader local community	Permanent	Medium – this would offer a range of facilities and programs not currently on offer. Improved physical access would benefit mobility impaired visitors	Moderate – the proposal would see the addition of several previously non- existent purpose-built facilities built to more modern accessibility standards	Medium – the school community has an interest in permanently improving access to facilities within the school.	Moderate positive	High positive
Accessibility	There may be disruption to services and access during construction (increased vehicle movements, access changes within school, and temporary parking for construction operations). A desktop analysis of the existing college road network indicates that current vehicular access to the site would likely be through the Avon Road entrance. There	 Prepare construction transport management plan to mitigate impacts of vehicle movements and coordinate access during construction. Particular attention should be given to maintaining safe pedestrian connections for students, visitors, and employees on site. 	Likely	School community, neighbouring dwellings, local residents on Avon Road	Temporary – short term (construction phase)	Mild – appropriate management will provide and communicate appropriate alternative access and parking	Low. No highly vulnerable groups have been identified as being impacted. Clear communication of temporary changes and measured should ensure sufficient adaptability	Low – No specific concerns have been identified as part of engagement	Minor	Medium



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
	may be impacts to internal road usage and parking.									
	Increased demand for services on site following commencement of operations may impact traffic and availability of parking. Though the educational facilities are intended to support the existing student structure, the Early Learning Centre would add capacity for 90 children and associated traffic.	• Implementation of the recommendations of the TIA, Green Travel Plan and Operational Transport Access and Management Plan to ensure that any impacts arising from additional traffic are effectively mitigated and that additional travel to the site utilises dedicated points of arrival/drop off to minimise impacts to residential streets	Possible	School community, local residents on Avon Road and Pymble Avenue	Permanent	Mild – with mitigations in place and access patterns being as described in the TIA it is not considered to have a severe impact	Moderate – the school is situated in a residential area, increases in traffic could be disruptive, however no highly vulnerable groups have been identified as being impacted.	Moderate – some concern has been identified regarding	Minor	Medium
	Grey House Walk may need to be closed during construction, limiting access for the 150 students who use it daily.	 Ensure Grey House Walk is only closed to pedestrian access if necessary Ensure sufficient alternate pedestrian access is provided if safe and practicable It is noted that the access from Centenary Car Park is considerably shorter than Grey House Walk and it is anticipated that the majority of parents 	Likely	School community, students accessing PLC by Pymble Avenue	Temporary – short term (construction phase)	Mild – it is understood a smaller subset of students utilise the walk and that alternatives will be provided.	Low – It is understood that alternative access will not be a significant inconvenience for students during construction	Low – No concerns about temporary close of Grey House Walk were identified	Minor	Medium



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
		dropping off and picking up their children from the ELC will opt to use the Centenary Car Park with dedicated parking.								
	The new ELC may increase traffic on Avon Road and Pymble Avenue.	 Consider modification to dangerous informal pickup / drop off area at Grey House to offset any increase in traffic during peak times The proposal is significantly closer to Centenary Car Park, which will be linked via an accessible pathway. The TIA anticipates that the majority of parents dropping off and picking up their children from the ELC will opt to use this access and not Pymble Avenue 	Possible	School community, local residents on Avon Road and Pymble Avenue	Permanent	Mild – the TIA and proposal indicate that any traffic increase can be managed through improved drop off/pickup facilities and that traffic is likely to use alternative route.	Low – the school is situated in a residential area, increases in traffic could be disruptive, however no highly vulnerable groups have been identified as being impacted.	Low – No specific concerns have been identified as part of engagement	Minor	Medium
Culture	There are no known Aboriginal artefacts present and the ACHAR suggested the site has low significance and archaeological potential. However, a potential unknown artefact may be	 Implement recommendations of ACHAR, including unexpected finds policy. 	Unlikely	Aboriginal stakeholders	N/A	Mild – provided an unexpected finds policy remains in place	Low – the ACHAR has not identified items of cultural significance	Low – No specific concerns have been identified as part of engagement	Minor	Low



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
	uncovered during construction.									
	There is no known non-Aboriginal heritage significance within the site. The draft Archaeological Assessment suggested there is nil potential that significant archaeological remains are present within the site. The report also advises that it will have no adverse impacts on the setting of the nearby Heritage Conservation Area.	 Implement recommendations from Archaeological Assessment, including an Unexpected Finds Policy. 	Very unlikely	Council, broader community	N/A	Mild – provided an unexpected finds policy remains in place	Low – the AA has not identified items of cultural significance	Low – No specific concerns have been identified as part of engagement	Minimal	Low
	Positive impacts to local culture through improved community access to cultural facilities, specifically the Dance Academy.	• None required	Likely	School community, broader local community	Permanent	Mild – some community members will benefit from improved facilities	Low – No highly vulnerable or sensitive groups are likely to be impacted	Low – No specific aspirations have been identified as part of engagement	Minor positive	Medium positive
Health and wellbeing	Potential health and wellbeing impacts may result from construction, affecting campus students, particularly in boarding houses to the north and	 Implement recommendations for mitigating construction impacts in Construction Management Plan, including managing hours of construction and implementing measures 	Possible	School community, boarding students, local residents on Pymble Avenue	Temporary – short term (construction phase)	Mild – mitigations will minimise impacts of this nature	Low – No highly vulnerable or sensitive groups have been identified that are likely to be impacted	Moderate – engagement revealed concern amongst adjacent properties regarding	Minor	Medium



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
	adjoining residential lots to the south, due to noise, air quality impacts, and access changes. Impacts would also be felt by residents of neighbouring properties who may be working from home.	to manage potential impacts to air quality arising from construction materials.						construction impacts		
	Noise from the operations of the ELC and dance academy may impact on residents of neighbouring properties, particularly those who may be working from home.	• The dance studio is to be located underground with appropriate sound mitigation measures in place, as per the acoustic assessment.	Likely	Local residents on Pymble Avenue	Permanent	Mild – the acoustic assessment evaluated the impacts to be low with appropriate noise mitigations	Low – No highly vulnerable or sensitive groups have been identified that are likely to be impacted	Moderate – consultation has identified high interest amongst some adjoining residents	Minimal	Low
Surroundings	The proposal of the new college STEM building on the southern boundary is noticeably higher than the currently existing structures and may potentially cause overshadowing on adjoining southern residential lots as well as disrupt views from those lots.	 Discuss potential overshadowing with residents of any identified neighbouring dwellings Ensure shadow diagrams are prepared and exhibited with the SSDA to enable residents to consider any impact on their solar access. 	Possible	School community, local residents on Pymble Avenue	Permanent	Moderate – overshadowing impacts can reduce the amenity of ones surroundings	Low – No highly vulnerable or sensitive groups have been identified that are likely to be impacted	consultation has identified high interest amongst some adjoining	Moderate	Medium



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
	Improved amenity and aesthetic value for school community including students, teachers, and boarders	 Consider including students, teachers, and boarders in any ongoing design aspects of the planning process. 	Likely	School community, boarding students	Permanent	Mild – the staff and students would experience some intangible benefits from improved surroundings	Low – No highly vulnerable or sensitive groups have been identified that are likely to be impacted	Low – No specific aspirations have been identified as part of engagement	Minor	Medium
Livelihood	Positive impacts to livelihoods arising from economic activity and direct and indirect employment opportunities during construction and operation.	• Utilise local labour where possible	Possible	Broader local community	Temporary – short term (construction phase)	Mild – impact would be beneficial but diffuse in intensity	Low – No highly vulnerable or sensitive groups have been identified that are likely to be impacted	Low – No specific concerns/aspira tions have been identified as part of engagement	Minor positive	Medium positive
Γŀ	Additional employment opportunities available on site during operation.	None required	Possible	Broader local community	Permanent	Mild – impact would be beneficial but diffuse in intensity	Low – No highly vulnerable or sensitive groups have been identified that are likely to be impacted	Low – No specific concerns/aspira tions have been identified as part of engagement	Minor positive	Medium positive
Decision-making systems	Notification of development and making submissions regarding it may not be accessibly to residents with low computer literacy or English language proficiency.	 Provide a variety of opportunities for engagement that are accessible (e.g. advertisement, letterboxing, phone / online interviews, fora or doorknocking as appropriate) 	Unlikely	Local residents, elderly residents, residents with low English proficiency	Temporary – short term (construction phase)	Mild – information to be provided through a range of channels and formats to assist stakeholders	-	Low – No specific concerns/aspira tions have been identified as part of engagement	Minor	Low



Theme	Impact detail	Suggested mitigation	Likelihood	Extent	Duration	Severity/scale	Sensitivity	Level of concern/ interest	Magnitude	Significance
	Stakeholders may not understand that an SSDA consultation process is different to a DA and be unable to engage.	 Provide information to stakeholders outlining the process for the proposed development, the relevant timeframes, and how and when they can participate in consultation. 	Possible	Local residents, broader local community	Temporary – short term (construction phase)	Mild – information has been provided through a range of channels and formats to assist stakeholders	has involved surrounding	Low – No specific concerns/aspira tions have been identified as part of engagement	Minor	Medium
	Stakeholders affected by proposed works and activities (students, staff and parents; surrounding residents) may feel unable to influence the project and may come forward with queries or concerns about potential impacts. The effective management of community and stakeholder engagement should be considered as part of a construction	 A clear communications process should be established for construction activities as part of the EIS, which identifies the nature of activities requiring surrounding residents to be notified, nominates a point of contact (e.g. telephone number) for issues or complaints and establishes a resolution process (e.g. through an incident diary). 	Unlikely	School community, local residents, broader local community.	Temporary – short term (construction phase)	Mild – some fears may persist. The project should offer concerned parties support with their issues as part of the CMP.	Low – residents and the school community will be informed of proposed works	Low – The engagement process is ongoing	Minor	Low

management plan.