

[REDACTED]
Normanhurst, NSW, 2076
27 January 2020

Attention: Director – Social and Infrastructure Assessments
Planning and Assessments
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Sent by email: [REDACTED]

SSD 8996 – Loreto Normanhurst School Redevelopment

Dear Jasmine

As a resident of [REDACTED] I object to the proposed development on grounds relating to traffic, parking and safety. I note that the public exhibition period has closed, however, I understand that the Department will still consider submissions up until 31 January, 2020. This was confirmed by email dated 19th December 2019, from Jason Maslen.

The following outlines my concerns with the application as currently available on the Department's web page.

1. Intersection of Pennant Hills Road and Osborn Road

There are approximately 160 residences that are reliant on Osborn Road as their point of access (Currawong Ave, Nepean Ave, Rivertop Close, Osborn Road). With the current school population predominantly using this intersection to access the school, there are already significant delays, particularly in the AM peak when the school peak and commuter peak coincide.

Page 27 of the Transport Assessment (TA) states that the intersection of Pennant Hills Rd/Osborn Rd/Normanhurst is currently operating at a good level of service (LOS) although notes there are capacity constraints in the AM peak hour. The capacity constraints are shown by the full SIDRA results provided in the Appendix to the TA. These results show that Osborn Rd in the AM peak is operating at a LOS E for through and right turning traffic. Under the RMS level of service this means **Osborn Rd is already at capacity with excessive delays in the AM peak.**

The application has failed to identify and address the existing problem at the Osborn Road/Pennant Hills intersection. Page 48 of the TA states that the signals are capable of clearing the right turn queue from Osborn Road. This is not correct.

During the AM peak it takes 3-4 phases for traffic to exit Osborn Road. These traffic delays will be significantly exacerbated with the proposal to increase the student population from 1100 to 2000, an 82% increase.

To reduce the traffic delays at this intersection, the intersection needs to be widened (on the school side) to create a dedicated right turn lane, through lane and retain the left turn lane in Osborn Road. It is noted that this request was made by another resident during the community consultation period (refer Table 7 of the EIS) but no consideration has been given in the application to this solution.

2. Parking

The traffic report states that the proposal will remove on street parking which currently occurs in Osborn Road and on Saturdays and events this extends into Currawong and Nepean Avenues. However, the application fails to demonstrate how this removal will be achieved.

According to the EIS documentation there are currently 179 carparking spaces provided for a student population of 1100 and staff population of 300. The application suggests additional parking will be provided in basement parking but leaves this to a future assessment.

This is not acceptable. If consent is being requested to increase the capacity of the school, the school must provide and address these impacts by providing all parking within its own property boundaries.

3. Pedestrians

The TA notes (page 4) that there are good pedestrian paths in the area. This is correct. However, the problem arises on a far too regular basis during Saturday sports days and events where pedestrians fail to use the footpath on the western side of Osborn Road, preferring to walk along the roadway as there is no footpath on the eastern side of Osborn Road due to the vegetation. This creates a safety issue with conflicts between pedestrians and vehicles.

If the school provided sufficient on-site parking to meet demands on Saturdays and events, this risk would be removed. Failing that, the school needs to educate and enforce with parents, students and visitors that they observe basic pedestrian safety practices, using footpaths not roads. Traffic/pedestrian controllers need to be employed by the school on these days to direct pedestrians and school traffic.

4. Construction

4.1 *Parking* - the application indicates that there will be approximately 60 site workers and that some (not specified how many spaces) will be provided on site. It also states that no street parking will be allowed but does not demonstrate how this will be achieved. A condition of consent must be imposed requiring the school to provide on-site parking for the construction workforce in addition to the on-site parking for staff and students.

4.2 *Truck access* - the sweep paths for the truck and dogs exiting onto Osborn Road will take out vehicles parked on Osborn Road near the exit.

As no sweep paths have been provided for truck and dogs entering the site from Osborn Road, it is assumed that this will access be prohibited. If this is not the case, then the applicant needs to demonstrate that truck and dogs can turn into Osborn Road from Pennant Hills Road, in particular the left turn movement needs to be assessed.

The TMP (page 21) indicates that there will be 5 concrete agitators (10 movements) per hour during the morning peak. Yet in the following paragraph it is stated that the school will not allow any trucks to leave the school between 6-9am. It needs to be clarified whether there will be any heavy vehicles during the AM peak, noting that 6-9 am is the usual peak period for concrete deliveries.

5. Inadequacy and inaccuracies with the application

- 5.1 There is no assessment of the traffic and parking impacts on Saturdays or during events. During these periods on street parking extends along Currawong Avenue and into Nepean Avenue.

Given the width of Currawong Avenue, this restricts traffic to one narrow lane (for both directions) regularly causing blockages when larger vehicles try to drive through. We own a motorhome and cannot enter or exit our street during Saturday sports days or events. In the event of an emergency, a fire truck would be unable to access any residents in Nepean Ave, Currawong Ave or Rivertop Close. This is clearly a safety issue and must be resolved.

- 5.2 The EIS states on page 34 states there will be an increase of 770 students, yet elsewhere it is indicated that the existing student population of 1100 is to increase to 2000. This is an increase of 900 students plus 80 at the early learning centre. Given this error, the accuracy of the assessment is called into question.

- 5.3 The TA has made an assumption that staff numbers will increase by 77 based on an unreferenced ratio of 1:10 (staff to students). Given the increase in student numbers is 900 not 770, if this ratio was correct, staff numbers would increase by 90.

The ratio of 1:10 to determine increase in staff is questionable for private schools. Based on the current school population, the ratio of staff to students is 1:3.6 or comparing to other nearby private schools of Barker and Knox, ratios are 1:6 (based on data published on <https://myschool.edu.au/>).

The applicant should be required to confirm the staff numbers and re-assess if the assumptions made in the TA are understated.

- 5.4 The TA states that the proposal will remove on street parking which currently occurs in Osborn Road and on weekends and during events this extends into Currawong and Nepean Avenue. Yet the EIS indicates car parking numbers will only be increased to accommodate 77 additional staff, so this will not remove on street parking. A condition of consent must be imposed requiring the school to increase the provision of on-site parking so as to remove parking in the street.

The suggestion in the TA that the car parking requirements can be assessed in the future is not acceptable. If the school is seeking approval to increase its population, then it must be required to mitigate and provide for the impact of this increase within its own property boundaries.

- 5.5 The application claims that appropriate measures (not specified) will be taken to ensure there is no queuing on public roads. The school fails to do that now with vehicles regularly queued back onto Osborn Road. This issue is also recognised in Hornsby Council's submission.

- 5.6 The traffic assessment claims that currently the school generates 331 arrival trips and 125 departure trips in the AM peak. However, using the assumptions in the TA, 30% of students arrive at school by car (driver, dropped off, taxi). Assuming 1.2 students per car as stated in the TA, that means 275 arrival vehicles for students plus 267 staff arrivals (89.1% of 300) which is a total 542 vehicles. This is 211 more vehicles arriving in the AM than what is stated in the TA.

In terms of departure trips in the AM peak, if 16% students are dropped off (including taxi/uber) and assuming 1.2 students per car that means 147 vehicles would depart after dropping off students, not the 125 trips stated on page 21.

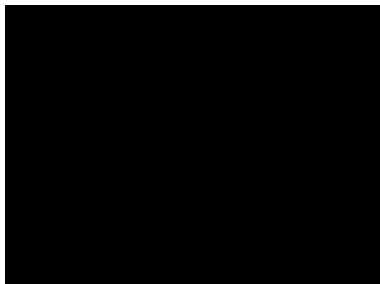
Given there are errors with the calculation of the existing traffic generated by the school, the assessment of the impact as a result of the increase in the school population cannot be relied upon.

- 5.7 The TA (page 46) claims the Osborn Rd intersection will improve as a result of Northconnex. A reduction in traffic volumes along Pennant Hills Road, will not remove the traffic delays for traffic exiting Osborn Road in the AM peak and therefore this statement is not correct.

For the reasons outlined above, the application should not be approved unless and until the school is prepared to mitigate its traffic and parking impacts.

In conclusion, I confirm that I have not made any reportable political donations in the last 2 years.

Yours faithfully

A large black rectangular box redacting the signature of Judy Grayson.

Judy Grayson
BA Dip Ed, M Env Plan