

Dear Sir/Madam,

Attention: Director - Social and Infrastructure Assessments
SSD-8996 Loreto Normanhurst, 91-93 Pennant Hills Road, Normanhurst

Objection to SSD-8996

I have reviewed the application for a concept plan for Loreto College Normanhurst and strongly object to the proposal for a number of reasons.

Generally, the Concept Masterplan seeks approval for:

- Establishment of 10 new building envelopes across the site for education and ancillary uses including student accommodation;
- Increase of the student number cap by 850 students from 1150 to 2000 students;
- The open space and landscape design;
- Pedestrian and circulation arrangements; and
- Associated car parking provision.

General comment

It is noted that a school has been on the site since the 1890s however in recent years there has been considerable growth both in the number of students and of facilities. In recent years there have been development applications for:

- DA 140/82 for a gymnasium - approved
- DA455/07 for a swimming pool complex and additions to the gymnasium. This DA also capped the number of students at 850 - approved
- 1018/03 for community use and change of operating hours for the gymnasium and swimming pool in 1997 - approved
- 1067/04 for a new 60 space car park in Osborn Road - approved
- 1151/04 for a new learning hall - approved
- 1277/04 for a new school building, music facilities - approved
- 1277/04/A S96(2) modification to increase the number of students from 850 to 915 - approved
- 1277/04/B to increase student numbers to 1150 -approved

Whilst the addition of facilities and replacement of school buildings is expected, since 2004 the student numbers have increased by 300 or almost 40%, however in that time there has been no commensurate attempt to mitigate the impact of the increase and associated increase in traffic on the surrounding area. This concept plan represents a further increase to 2000 students as well as 80 in the ELC (Early Learning Centre)

The Environmental Impact Statement is very detailed but contains some major flaws and I believe does not adequately address the potential impact of the proposal on the adjoining residential precinct. In fact, there is virtually no mention on the surrounding area except in regards to some comment on potential overshadowing.

Specific Objection

The EIS that accompanies the Application is deficient in a number of ways, uses flawed arguments as justification and fails to adequately address the potential impact on the surrounding residential precinct. Specifically:

- Section 2.5 which is supposed to indicate surrounding development shows only a photograph of Pennant Hills Road (Figure 11) and one house in Mount Pleasant Avenue. There is no description of the streetscape in Osborn Road which has to carry the bulk of traffic from the site or of the rest of Mount Pleasant Avenue, particularly the section potentially impacted by Stage 1.
- The EIS states that the increase in student numbers is consistent with the growth estimated by the District Plan which is estimated at 20%. The growth estimated/anticipated in the District Plan is to accommodate increased residential population in the area to which the District Plan applies. Loreto is a private school with day and boarding students. The District Plan is only relevant if the increase in students at Loreto is related to increased residential growth in the Plan's area. As it is not indicated if the students at Loreto live within the area of the Plan this correlation is tenuous.
- The proposed height of buildings - see below for detail
- Traffic – see below for detail

Despite what is stated in the EIS, there is no relationship to this proposal and the local community other than its location. It is a private day and boarding school which may be attended by some local students but to say it meets the day-to-day needs of local residents has not been substantiated.

Height of Buildings

The EIS states that “the educational establishment is not required to achieve strict compliance with the height of buildings clause contained within the Hornsby LEP and that the proposed development achieves the objectives of the height of buildings development standard because “The height of the development is appropriate given the sites context and land use” and further,

- The height of the development does not result in a significant loss of any amenity for any adjoining residences beyond what would be considered reasonable;
- The development is consistent with the development potential of the site, which is not limited by the Hornsby LEP height limit but rather by the Education SEPP;
- The proposed student capacity of the site will be addressed through increased educational floor space, recreational floor space and car parking throughout the site as part of future development applications;

Additionally, it states that:

- The proposed development is consistent with the objectives of the R2 Low Density Residential zone in providing for an upgraded facility that will assist in meeting the day to day needs of residents.
- The proposed development is in the public interest given the “numerous positive social, ecological, design and economic impacts it will deliver for the site
- The proposed development will have little or no adverse impact on adjoining sites
- The objectives of state and local strategic planning policies in providing additional educational floor space would be thwarted if strict compliance was required with the height of buildings development standard;
- The proposal will go some way to addressing the required 21,900 student spaces that are required in the North District over the next two decades.

- The site is zoned R2 Low Density Residential. This is reflective of the surrounding site context rather than the educational land use itself. Schools within NSW tend to be zoned either to reflect the adjoining landuses or SP2 Infrastructure (Educational Establishment) with no height limit. This is reflected in a number of nearby schools which are noted as: Abbotsleigh, Knox Grammar, Epping Boys high, Warrawee Public, Wahroonga Public, Killara public, Chatswood High School, St Anthony's Catholic Primary School, Marsfield.
- The taller, more flexible building envelopes will allow Loreto Normanhurst to cater for the increasing student numbers within the North District; in a manner consistent with the strategic intent of the Education SEPP, the Greater Sydney Regional Plan and the North District Plan.

Comment/Objection

The statements about the increase in student numbers being consistent with and meeting the objective of the District Plan is tenuous. The figures indicated in the District Plans primarily relate to population growth in the Plan's area. Loreto is a private catholic day and boarding school. There would only be a direct correlation if the majority of the students to be catered for were living with the area of the District Plan. **No evidence has been provided to support the claim.**

The EIS includes a table of "nearby" schools zoned SP2 Infrastructure and which therefore do not have a height control. Marsfield, Chatswood, Killara and Epping are not "nearby" schools. The EIS conveniently fails to mention Barker College, St Leo's College, Normanhurst Boys High, Normanhurst Public School, Normanhurst West Public School and Hornsby South Public School which are in fact nearby schools (in fact 2 are within visual range of Loreto) and which are all zoned R2 Low Density Residential with a height control of 8.5m.

To merely state some schools are zoned SP2 Infrastructure is not a justification for the significant increase in height that is sought, particularly as the schools located nearby are in fact zoned R2 Low Density Residential. No evidence base is provided to support the comparison with schools zoned SP2 e.g. location of the schools, relationship with surrounding land uses, traffic etc.

It is therefore considered that the argument to increase the height based on comparison with other schools fails.

Frequently through Appendix X it is stated that the proposal is in the public interest and will assist in meeting the day to day needs of residents and there will be limited impact on surrounding sites. The EIS fails to address the visual impact on local residents due to the proposed increase bulk and scale of the buildings. Loreto is located on a high point and already is a visually dominant feature of the landscape. **The fact that the proposed development will add to this visual domination is not addressed.**

Further, the EIS does not address that fact that the increase in height relates to an increase in student numbers and the resultant impact that increase will have on the local community through other matters such as traffic. I appreciate that there is a separate traffic report but there is direct link between increased height, increased student numbers and increased traffic and other impacts which are not addressed in the request to vary the height control.

The EIS focuses on the benefits to Loreto and the student population and fails to acknowledge the potential negative impact on the surrounding residential community. The potential changes do not meet the "day to day" needs of the local community and given that the area surrounding the school is zoned R2 Low Density Residential it is unlikely that there will be considerable population growth in that immediate area, rather, growth will be focused around centres with additional infrastructure, such as Hornsby.

Traffic

The traffic report is lengthy but it is considered does not adequately address the potential impact on the adjacent residential precinct particularly on Osborn Road.

Between 3.30pm – 4.15pm Monday to Friday on school days it is almost impossible to enter/exit my driveway. The result is, if I try to enter my driveway traffic backs up behind me onto Pennant Hills Road.

The traffic report submitted focusses on the functioning of the intersections and traffic flow on Pennant Hills Road. It may be correct that the intersection at Osborn Road functions at an acceptable level however during peak periods as soon as the queue to Pennant Hills Road clears another forms immediately. There is also no mention of Saturday sport. When sport does occur on Saturday morning it can take 3 phases of lights for me to be able to actually reverse onto Osborn Road.

The report states that in 2027

“As can be seen, there would be a total of 311 additional students arriving at the School during the morning peak hour, with 123 travelling by car. As a result, there would be a total of 160 vehicle travelling to / from the School (82 arrivals / 78 departures). There would also be an additional 8 School bus trips (4 arrivals / 4 departures) generated in the morning peak hour.” And

“As can be seen, there would be a total of 314 additional students departing the School during the afternoon peak hour, with 124 travelling by car. As a result, there would be a total of 160 vehicle travelling to / from the School (78 arrivals / 82 departures). There would also be an additional 8 School bus trips (4 arrivals / 4 departures) generated in the afternoon peak hour.”

Further on 2047:

“As can be seen from Table 11, there would be a total of 577 additional students arriving at the School during the morning peak hour, with 235 travelling by car. As a result, there would be a total of 302 vehicle travelling to / from the School (157 arrivals 1145 departures). There would also be an additional 16 School bus trips (8 arrivals 18 departures) generated in the morning peak hour.” And,

‘Table 12 provides the additional afternoon trip generation of the School by 2047. As can be seen, there would be a total of 588 additional students departing the School during the afternoon peak hour, with 238 travelling by car. As a result, there would be a total of 305 vehicle travelling to / from the School (146 arrivals /159 departures). There would also be an additional 16 School bus trips (8 arrivals /8 departures) generated in the evening peak hour.”

The effect on the local area of the number of additional trips generated is not addressed. Rather the discussion focusses on Pennant Hills Road, the intersections with that road and the possible but of course unproven benefits of NorthConnex.

The Traffic Study concludes with the comment:

“In summary, the Proposal is supportable on traffic planning grounds and will not result in any adverse impacts on the surrounding road network or the availability of on-street parking.”

This statement is totally inadequate. Introducing that many car and bus movements into a local residential precinct must have an impact on local traffic. I also find it strange that a masterplan of this scale appears to impact less than an 80 Place Early Learning Centre, it being noted that the traffic report for the ELC recommended a number of changes within the Osborn Road precinct, including the removal of some on street parking and changes to the traffic signals, which personally I did not support as they would have had a negative impact on local residents.

Conclusion

Section 6.21 of the EIS is titled Site Suitability and Public Interest and argues among other things that:

- The proposal is consistent with the objectives of the zone as it provides a complementary facility and service that meets the day-to-day needs of the residents;
- The proposal adequately plans and responds to anticipated future growth in school enrolments in Hornsby LGA and surrounds;
- The proposal will create additional jobs, during the construction phase as well as during the operation phase, and represents an investment in the local economy;

Further in the Social and Economic Justification of the proposal the EIS states:

"Importantly, the proposal strategically plans for anticipated growth in student enrolment numbers in Hornsby LGA and nearby LGAs and increases the school's student capacity. The proposal will also create new long term job opportunities and contribute to the economic activity of the locality. The staged 30 year masterplan will also facilitate the supply of construction jobs. As such, the overall proposal will result in positive social and economic outcomes."

There is no relationship to this proposal and the local community other than its location. It is a private day and boarding school which may be attended by some local students but to say it meets the day-to-day needs of local residents has not been substantiated. Nor has the relationship to the provision of local jobs. Additionally, as stated previously, to relate the proposal to targets in the District Plan is also fallacy as the District Plan targets relate to housing and population growth in the Plan area and that has not been adequately addressed in the EIS. The District Plan is only relevant of the increase in student numbers relates to growth in the plan area.

Consequently, I object to the concept plan as proposed in SSD 8996 as I believe it will have a significant detrimental affect on the surrounding residential precinct. Further, while the Environmental Impact Statement is very detailed it ignores that potential impact and contains some major flaws as detailed in my comments above.

DECLARATION

I have not made any reportable political donations in the previous two years.

Yours faithfully



Meredith Shipway