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NORMANHURST 2076

6 March 2021

Attention: Director – Social and Other Infrastructure Assessments

Dear Sir/Madam

LORETO NORMANHURST SCHOOL REDEVELOPMENT (CONCEPT PROPOSAL AND STAGE 1), 91-93 PENNANT HILLS ROAD NORMANHURST (SSD-8996) – OBJECTION

We write to you to object to certain aspects of the above proposal relating to traffic.

We have lived at this address for [REDACTED] and have had to adapt to the exponential growth in traffic in this area. We believe that the proposal fails to acknowledge or address its flow-on implications to areas beyond the immediate streets, Osborn Road, Mount Pleasant Avenue and that part of Pennant Hills Road, immediately adjacent to Loreto College.

We also believe that the Traffic Report, dated 15 January 2020, the Operational Traffic Management Plan, dated 8 December 2020 and the Green Travel Plan, dated 8 December 2020, all by Taylor Thompson Whiting (NSW) Pty Ltd (TTW) make certain incorrect assumptions and their recommendations should thus be treated with caution. In particular:

The design and adequacy of the Osborn Road intersection with Pennant Hills Road and the sequencing of traffic lights at the intersection; and

The necessity of installing traffic lights at the Mount Pleasant Avenue intersection, notwithstanding the reported decision against installation by Roads and Maritime (NSW).

The Osborn Road Intersection with Pennant Hills Road

TTW acknowledges that this intersection is already operating at capacity. It sits directly opposite Normanhurst Road, neither intersection having a dedicated right turn arrow. The Osborn Road exit to Pennant Hills Road has two lanes, the left a compulsory left-turn lane, permitting a left turn against a red signal after stopping. The right-turn lane accommodates those wishing to turn right onto Pennant Hills Road and those wishing to proceed down Normanhurst Road. Those drivers wishing to turn right onto Pennant Hills Road must give way to cars crossing from Normanhurst Road into Osborn Road. Neither those cars, nor those trying to go straight ahead onto Normanhurst Rd can move until all cars from Normanhurst Road have crossed into Osborn. Very often the traffic lights change before a

single car is able to pass through. We have observed frequent near-misses, with cars trying to outrun others in this intersection.

This entire intersection is choked and dangerous. Planned increases in Loreto student numbers will inevitably exacerbate what is already a critical issue in peak times.

Both the design of the intersection and the traffic lights require attention. From our reading, TTW fails to make useful recommendations on this point. To respect part of the Loreto embankment in order to widen the approaches would, through loss of trees, adversely affect the beauty of the public approaches to the college, that is likely. However this would need to be balanced against improved safety and better traffic flow, as it is quite a tiny access road, for what it is expected to manage. And any damage could be ameliorated with landscaping and further planting.

At a minimum, we believe that the following should form a condition of any consent; that the developers liaise with Roads and Maritime for:

- i) Removal of the compulsory left turn lane in order to allow cars leaving Osborn Road to proceed safely and efficiently to Normanhurst Road;
- ii) Installation of both traffic right-turn arrows and left-turn arrows at Osborn Road
- iii) Installation of a right-turn arrow at Normanhurst Road; (a left hand signal is already provided at Normanhurst Road).

The Intersection of Mount Pleasant Avenue with Pennant Hills Road

It is hard to believe that TTW's traffic proposals are not predicated on the necessity to install signals at Mount Pleasant Avenue. The TTW report states that Roads and Maritime will not permit traffic signals at this point on the grounds that they would be too close to the Normanhurst/Osborn signals. The report also states that Roads and Maritime intend at some stage, to install a **no right turn sign** (from Mt Pleasant into Pennant Hills Road), as right turns are extremely dangerous there but TTW was unable to place a time on this. It is curious that these issues do not appear to have been raised by TTW at its meeting with Roads and Maritime on 30 September 2020. Beyond its vague assertions that Loreto will continue to make representations on the issue, TTW appears to have made little, if any effort, to advance the need for lights at the intersection and so has designed an unnecessarily convoluted drop-off and pick-up regime, in order to move people around. The suggestion, to undertake three monthly traffic audits at this intersection, appears to us as tokenism.

There must be hundreds of sets of traffic signals in Sydney that are closer to each-other than the distance between Mount Pleasant Avenue and Osborn/Normanhurst Roads. Proper sequencing of lights could minimise stop-starts along Pennant Hills Road. A *no right turn* signal will commit residents of Mount Pleasant Avenue to a convoluted round trip, in order to head east, whilst exacerbating traffic chaos in Normanhurst Road.

Traffic signals at this intersection would also help local pedestrians who live south of Pennant Hills Road, to access Normanhurst Station via Fraser Road. The very lengthy distance between the crossing at Jasmine Avenue and the footbridge near Loreto, frequently results in people, especially school children, dashing across busy Pennant Hills Road, to access the station via Fraser Road.

By failing to address these two key areas, the TTW proposal for traffic management will, if adopted, add to the existing drop-off and pick-up congestion and flow into adjoining streets, namely Normanhurst Road, Fraser Road, Denman Parade and Buckingham Road at the rail bridge.

We note that, in TTW's proposal for the Early Learning Centre (ELC), parents traveling from the east and dropping off in Mount Pleasant Avenue, will be advised to turn left onto Pennant Hills Road, then right at Normanhurst Road, down to the roundabout at Denman Parade then back up to the Normanhurst Road / Pennant Hills Road intersection, before turning left. Normanhurst Road and adjoining streets are already incapable of functioning properly during school drop-off and pick-up times, due to the confluence of students from Loreto, Normanhurst Boys High School and Normanhurst Public School. These, in turn pass commuters and the many local students who travel to high schools in other areas and the traffic generated by parents, buses and students-who-drive. They have to wend their way along streets choked with commuter parking and people circling in search of a parking space.

Traffic is frequently at a standstill during peak times. Northbound traffic from Normanhurst Road is channelled through a roundabout via the shopping centre at Denman Parade and over a dual lane rail bridge at Buckingham Avenue, having merged with traffic from four other streets. From there, traffic wishing to turn right into busy Milson Parade/Malsbury Street is held up for extended periods, as there are no traffic signals, and those wishing to turn left are caught behind those turning right. This frequently results in a traffic conga-line, backing up all the way through the shops, through Normanhurst Road and up to Pennant Hills Road. For TTW to invite ELC parents to join this melee is preposterous. Some ELC parents may try to re-join Pennant Hills Road via Fraser Road from Normanhurst Road, but would do so at their peril. They will quickly learn that this is an impossibility, as commuter cars line both sides, leaving barely room for one car to squeeze past and the road is dominated by cars having picked up students from the main entrance to Normanhurst Boys High School on Fraser Road and trying to navigate towards the stand-still in Normanhurst Road.

Our prediction is that parents of students living to the east of Loreto, will attempt to avoid the *drive through the school* option and drop their daughters off in Mount Pleasant Avenue. Then, unless a *no right turn* signal is installed, they will take their chances and turn right at Pennant Hills Road, as at present, an option fraught with danger. If forced to turn left, they will join ELC parents in the Normanhurst Road debacle.

The inclusion of a full primary school at Loreto will add many younger children to enrolments. We are therefore cautious about TTW's predictions about reducing the numbers of arrivals at, and departures from school by car. We live directly opposite a primary school. Apart from walkers, almost all other children arrive by car or, for some older students, bus. A similar pattern might be expected at Loreto, the difference being that a high proportion of children attending the local primary school live locally, whereas, on TTW's 2019 figures, only 3.8% of students live close enough to the school to walk. Some older, primary school children might find their way to school by train or bus, but we believe that the K-12 proposal, together with implementation of the ELC will lead to a significant increase in the numbers of vehicles accessing the school.

The proposed *drive-through* road across the school property will present significant safety risks for staff and students. TTW's Green Travel Plan acknowledges risks to pedestrian safety but does not, from our reading propose risk-mitigation issues for students crossing the two-way road that will bisect the school through its busy heart. Younger, primary school students, whose stage of brain development renders them less able to anticipate danger, would be at particular risk.

TTW's traffic study was undertaken one day, on 7 November 2019, the third last day of the HSC examinations, when mostly non-core subjects were being attempted and most HSC students from Loreto and nearby Normanhurst Boys High School were unlikely to have been anywhere near the school. In our view, TTW fails its own test of conducting its study on a typical school day and its data and modelling thus understate the issues.

To us, installation of traffic signals at the Mount Pleasant intersection must be a **condition of consent**. If a project such as this is deemed to be one of State Significance, much greater influence needs to be brought to bear, in order to achieve this outcome than has been apparent so far.

We also make the following observations:

TTW's traffic studies do not acknowledge the traffic already generated by existing Loreto students and their parents accessing the school via Normanhurst Road, which is frequently used as a drop-off and pick-up site. It also fails to acknowledge the existing and projected needs of Normanhurst Boys High School and Normanhurst Public School as they continue to expand with population growth. Current enrolments for the former are approximately 750 students and for the latter 400.

As Loreto is a private school, it is assumed that many children living within Normanhurst attend schools outside of Normanhurst and this would be reflective of the statistic that only 3.8% of students from Loreto walk to school and none cycle. Whilst the proposed Green Travel Plan is to be lauded, we feel that location, distance and topography are likely to mitigate against achievement of some of its targets, including walking and cycling. Were it to achieve its near 6% increase in students traveling by train, this could amount to up to 500 students moving between station and school, adding to foot congestion and perhaps necessitating staggered starting and finishing times, in order to increase safety on the roads and at the station.

General Observations and Comments

We note that many of our observations about the travel arrangements for students apply equally to staff, including the proposed 70 new staff who will work in the fully completed facility and the many current and future support staff engaged in such a large facility.

Teacher needs are quite different from those of students. Many start early and finish late. Many bring work home and take it back to school. Non-peak buses and trains are less frequent. Many staff are involved in extra-curricular school activities. Many staff will have family responsibilities which will necessitate using their own transport, eg collecting children from childcare, preparing meals etc. We feel that the green travel goals for teachers are therefore ambitious and that requirements for parking may well be understated.

We wish to state that we have always found Loreto to be good neighbours and that, in all our years here, we have never had cause for complaint against the school or any of its students. Our comments arise from a desire to ensure the safety of current and future Loreto staff and students and towards ameliorating impacts of the proposed development upon our local community.

Declaration – We have not made a political donation in the last two years.

Yours sincerely,

A solid black rectangular box used to redact the signature of the person writing the letter.