ETHOS URBAN

18 May 2021

Agency Submissions

Table 1 Agency Issues with Comments

Summary of issue raised	Comment
Department of Planning, Industry and Environment	
Statutory Requirements	
Please provide assessments against the following statutory/draft statutory instruments as part of the Supplementary RtS:	
Draft Housing Diversity State Environmental Planning Policy SEPP	An assessment of the Draft Housing Diversity SEPP is provided in **Table 2** below.
State Regional Environmental Plan No.20 - Hawkesbury-Nepean River (SREP 20)	The site is outside of the land identified as applying to the SREP 20 Boundary Map. As such, the SREP 20 does not apply to this development.
Draft Education SEPP	An assessment of the Draft Education SEPP is provided in **Table 3** below.
State Environmental Planning Policy (Building Sustainability Index BASIX) 2004 (BASIX SEPP)	A BASIX Certificate is located at **Appendix J**.
Traffic and Parking	
The RtS and submitted Traffic Assessment report do not confirm whether the proposed link road within the site is a one or two-way road. Please provide this information and if a one-way road is proposed, confirm the direction of one-way travel and why the proposed direction is appropriate.	As stated in the Operational Traffic Management Plan (OTMP), the proposed link road is one-way from Osborn Road to Mount Pleasant Avenue. This direction has been proposed as concerns have been raised previously regarding right turn movements at the intersection of Mount Pleasant Avenue and Pennant Hills Road. By enforcing this one-way movement and restricting use of this drop off to those travelling to and from the west, vehicles associated with this drop off will only exit left onto Pennant Hills Road. As also noted in the OTMP, a quarterly audit will be undertaken of the Mount Pleasant intersection to ensure parents/carers are only turning left onto Pennant Hills Road. See **Appendix A** for more details.
Please confirm: • The location of the 15 car parking spaces to be dedicated for Early Learning Centre use. • the purpose of the layover area outside the front entrance (P4 Primary car park) of the Boarding Accommodation building And how the above space will be managed to prevent casual parking / general student pick-up/drop-off.	• The 15 spaces required for the Early Learning Centre development application will be located within the spaces shown in Figure 1 in the Transport Response to Submission (RtS) Report, once the P1A carpark and through site link is constructed, the parking spaces that will be impacted by the works (at location 'B' and 'D' in figure 1 of the Traffic RtS Report) will be located within the P1A car park. These spaces will be clearly line marked as well as indicated to staff as part of the staff allocation discussed in Section 6.2.1 of the Operational Traffic Management Plan. • The layover area outside of the Boarding House will be used for incidental drop off (eg. parent drop off of student after weeknight or weekend leave or appointment/ to access the building and unload which is a rare occurrence on site. There is a gate to this carpark currently that provides access control through the use of swipe cards. This gate will remain in place restricting the use of this space during typical school days.

Summary of issue raised	Comment
• Whether bicycle parking and end of trip facilities will be provided in accordance with the Hornsby DCP.	• Bicycle parking and end of trip facilities will be provided in accordance with Hornsby Shire Council's DCP, refer to **Appendix A** and **Section 1.2** of the RTS letter.
Please provide swept path diagram(s) for the P3A Osborn Road car park pick-up/drop-off area to demonstrate that vehicles have sufficient space to turn around when leaving.	Refer to Appendix A in the Traffic RtS Report for a swept path diagram of the P3A Osborn Road car park.
Please confirm the total number and location(s) of: - existing bicycle parking spaces. - proposed bicycle parking spaces to be provided within the Boarding Accommodation building and within the Stage 1 works landscaping / car parking areas.	See **Section 1.2** of the RTS letter and **Appendix A** for discussion of bicycle parking.
Staging	
Please provide a single 'Staging Plan' for the Stage 1 works (to include the construction sub-stages) with stage boundaries outlined (including buildings, infrastructure and landscaping works) and provide an estimate of construction timing (how many years) for each sub-stage of the Stage 1 works.	Refer to **Appendix F Staging Letter and Plan** for timing and stage boundaries.
Please confirm the timing and phasing of the following works within Stage 1: - landscaping works. - Boarding Accommodation building. - the bus bays (located in place of the two current pick-up/drop-off bays).	• Landscaping will occur during each stage of works within Stage 1 – see staging plan (**Appendix F**). • The Boarding House will form part of Stage 2 (Stage 2b) – see Staging Plan at **Appendix F**. • The bus bays are discussed at Section 1.7 of the RTS statement. The change is operational only, and so no physical works are to occur.
Please confirm the location of the uniform shop during the site preparation of Stage 1 works.	The uniform shop is a demountable building. A temporary building will be provided on the future site of the ELC until the ELC building is completed, and at which time the uniform shop will be located within the ELC building (See **Section 1.3** of the RTS letter)
Alignment of the stage 1 works to any proposed occupation/operation/decanting staging	No decanting required. Occupation will be in accordance with the Staging Plan.
Ecosystem Credits The amended Biodiversity Assessment Report should clarify how many of the required 8 ecosystem credits relate specifically to the Stage 1 works.	All credits are related to the Stage 1 works.
Other matters	
Please clarify the Capital Investment Value (CIV) for the Concept Proposal (noting discrepancies in the CIV report and the Environmental Impact Statement (EIS)).	The Concept Proposal is estimated to have a total CIV of $130,502,809. See CIV Statement at **Appendix C**.

Summary of issue raised	Comment
Please clarify the CIV for the and Stage 1 works	The CIV for Stage 1 works is estimated to be $43,338,809. See CIV Statement at **Appendix C**.
Please clarify construction and operational jobs separately for the Concept Proposal and for the Stage 1 works	The Concept Plan is estimated to create 555 jobs. Stage 1 works is estimated to create 184 jobs. Refer to **Appendix C**
Please clarify the existing and proposed maximum number of students separately for primary and secondary school	Maximum enrolments by the completion of the masterplan is 450 students in primary school (years K-6) and 1550 students in secondary (years 7-12).
Please clarify the use of the Loreto Community House (previous use, in case it is current vacantly).	The community house if to be vacated in May 2021. The previous use was for residency by the Loreto Sisters.
Please clarify whether the school offers before / after school or school holiday care or any other out of hours uses (in addition to those cited at Section 2.2.2 of the EIS) and whether the proposal seeks to change current arrangements.	The school currently operates an afterschool care program. The proposal does not seek to change current arrangements, which is to operate between Monday to Thursday from 3.15 to 8pm. There is no before school care program.
Please clarify the total number of trees to be removed as part of the Stage 1 works (the EIS states 105 trees would be removed, whereas the Arborist Report states 94 trees (59 for boarding house and 35 elsewhere)).	The Arborist has grouped some trees and provides the following commentary: *T195a (x8) and T195b (x5) are groups or line of trees of the same species, which have been treated as one. Therefore the actual number of trees to be removed for the boarding house is 70, not 59.*
Please clarify the number of hours of solar access and natural ventilation for the two staff apartments.	Cross ventilation is possible to Apartment 2 as it has the opportunity for openings on the North (currently where the entry is) however Apartment 1 is not naturally ventilated as it has a single aspect to the east. In regard to Solar Access the attached sun's eye diagram demonstrate that the terraces of both apartments receive a min. 2 hours direct sunlight between 9am and 3 pm. See **Appendix I**.
Please clarify the Green Star rating that is targeted as part of Concept Proposal environmental sustainability initiatives.	The Concept proposal is targeting a 4-star Green Star rating.
Please clarify the capacity (in Kilowatt hour) of the proposed photovoltaic panel array on the roof of the Boarding Accommodation building.	The proposed photovoltaic panel array on the roof of the Boarding Accommodation building is confirmed to have the capacity (in Kilowatt/hour) of 38.4kW based on 96 x 400w panels.
Please clarify the total volume of cut and fill in cubic metres with supporting diagrams where necessary.	The total cut for Stage 1 works is 11,470m^3 and a total fill of 1,462m^3. This will result in a net of -10,462m^3. A supporting diagram is provided in **Appendix D.**
Please clarify the exact number of existing school pickup/drop off spaces	The current facility at Osborn Road accommodates 4 pickup and drop off spaces.
Please clarify the proposed number of school bus spaces	There will be capacity for 2 additional school buses (total of four spaces) when the existing pick up and drop off is relocated.

Summary of issue raised	Comment
Documents and Drawings	
Please provide an overall Concept Landscape Plan, including those Concept Proposal areas beyond the Stage 1 works	The overall concept landscape plan is included in **Appendix E.**
Please provide an accommodation schedule for the Boarding Accommodation building, including breakdown of room types and sizes, number of beds, amenity spaces and sizes and staff apartments.	An accommodation schedule is provided in **Appendix G**.
Please provide an additional photomontage of views towards the Stage 1 Boarding Accommodation building from across the oval.	Photomontages are available in **Appendix H**
Please provide an updated image on page 54 of EIS Design Report	See **Appendix K**
Department of Planning, Industry and Environment – Traffic Peer Review Comments	
Queuing Analysis Queuing length resulting from pikcup/drop off facilities should be included in the volumes of Figure 6.1. Determine if there will be any extensive queues line up during sharp peak times (8am-8:20am and 3:15pm-3:30pm). Results should also relate to spill back into OSborn Road The statement “It was observed on site that some queuing can occur during peak periods as a result of the above geometrical constraints and driver behaviour.” in s6.1.2 needs to be quantified.	The volumes in Figure 6.1 of the original Traffic Report dated 15 January 2020 included in the first response to submission provide movements into and out of the existing pick up and drop off facility and have been used to project future demands of the pick-up and drop-off facility. The proposed pick up and drop off facility will provide through lanes to enable recirculation and will be marshaled to prevent queuing onto adjacent streets. As stated in the current Traffic RtS Report (**Appendix A)**, the existing pick up and drop off facility is insufficient in terms of length for drop off and has existing geometry that discourages recirculation by drivers. For this reason the relocation of this drop off is proposed as part of the Stage 1 works. Refer to **Appendix A** for proposed queuing locations. As part of the ELC approval process, drone surveys were undertaken in September 2019 of the intersections of Osborn Road and Mount Pleasant Avenue with Pennant Hills Road to review queue lengths within Osbornf Road. These surveys identified a 9 vehicle queue, refer to Appendix B in the Traffic RtS Report for a copy of this report.
SIDRA Modelling Traffic Report needs to include PM peak results	As part of the ELC approval process, drone surveys were undertaken in September 2019 of the intersections of Osborn Road and Mount Pleasant Avenue with Pennant Hills Road to validate the intersection model. Refer to Appendix B in the Traffic RtS Report for a copy of this report. Refer to revised SIDRA model results in Appendix C of the Traffic RtS Report that include the 95th percentile queue.
Reports need to include 95th percentile queues (in metres) and a discussion should be created to identify congested approaches and the extent of queueing as well as potential spill back to adjacent intersections/driveways	
Provide a calibration and validation report for SIDRA modelling and evidence of observed vs. modelled queue length comparisons to ascertain any existing issues, considering site observations was undertaken.	

Summary of issue raised	Comment
The *Transport for NSW Traffic Modelling Guidelines (2013)* lists the 95th percentile queue as a core performance element that should be assessed for any intersection modelling using SIDRA Intersection. This also ensures that the base models are fit for the purpose of assessing future scenarios	
Include modeling of a future year scenario to identify impacts on Mount Pleasant Avenue approach, right turn from Osborn Road and the proposed egress route via Normanhurst Road for drivers travelling east due to redistributed traffic. This should be based on Section 5.6.3 of the traffic report which states that there is no timeframe for the installation of the No Right Turn from Mount Pleasant Avenue (south) into Pennant Hills Road (east)	While there is no timeframe for the installation of the No Right Turn, the Operational Traffic Management Plan details how right turns will be restricted for traffic associated with the pick up and drop off: • Vehicles using the through site link will only be from addresses that are to the west of the School. • Parents/carers/other drivers will be instructed to only turn left onto Pennant Hills Road. • An audit of the above instruction will be conducted quarterly to ensure this instruction is followed. ELC traffic that is required to travel east from Mount Pleasant Avenue has been modelled to travel through the proposed egress route via Normanhurst Road. Vehicles using the Osborn Road pick up and drop off (those travelling to the east of the School) have been modelled in the future year scenario to turn right onto Pennant Hills Road. As the through site link is one-way in an east direction only, no vehicles will travel from Mount Pleasant Avenue to Osborn Road.
Include indication of the timing of each stage of the development and modeling to determine progressive impacts and need for design modifications prior to the full development being realised	The development seeks approval for the detailed DA for stages 1-4. As such the modelling has been conducted to account for the full stage that is seeking detailed approval and for the full concept stage development. Any future development applications for building work within the site will have an associated Traffic Impact Assessment that will review the proposal in relation to the overall traffic and assess whether any design modifications will be required.
The Pennant Hills Road/Normanhurst Road/ Osborn Road and Pennant Hills Road/Mount Pleasant Avenue intersections should be modelled as a network as the outputs show that westbound queues on Pennant Hills Road at Normanhurst Road/Osborn Road spill back beyond Mount Pleasant Avenue	Refer to revised SIDRA model results in Appendix C of the Traffic RtS Report with the intersections modelled as a network model. While the westbound queues extend past Mount Pleasant Avenue, this is an existing issue shown in the 2019 existing model and evidenced by the installation of signage to prevent queuing over the intersection. Queues are shown to reduce in the future due to reduced vehicle volumes as a result of Northconnex.
Existing models should incorporate User-Given Phase Times using the Transport for NSW Intersection Diagnostic Monitor data to reflect actual traffic conditions on the individual approaches. The future models can use Practical or Optimal Cycle Time where necessary	User given phase times have been applied based on SCATS data received for Thursday the 7th of November 2019.
Surveyed pedestrian volumes should be used for assessing the overal impact, rather than default pedestrian volumes.	The north and south intersection legs on the Pennant Hills Road/Osborn Road/Normanhurst Road intersection provide signalised pedestrian crossings. These crossings experience low volumes of pedestrians during school peak times as train and bus connections are located to the east of Normanhurst Road.

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	The traffic counts completed as part of the original submission found low pedestrian volumes of 1 pedestrian across Normanhurst Road and 21 pedestrians across Osborn Road. As such, the default of 50 pedestrians across both crossings allows for a more conservative approach than applying the existing pedestrian volumes experienced at the site.
Operational Traffic Management The Operational Traffic Management Plan (OTMP) indicates drivers are instructed to 'recirculate' if spaces are available or children aren't ready. Confirm what is the extent of queueing as a result of circulating and whether it would spill back to the exit driveway and/or impact through vehicles on Osborn Road and parking	Recirculation of vehicles is to prevent cars from stopping internally and queuing back onto external roads. By having a through lane adjacent to the pick up and drop off areas, vehicles will not be required to stop to wait for a location to pull into a drop off bay. As such vehicles will be moving in free flow without queuing.
Confirm how management measures will ensure that drivers do not stop within the through site link to pick up and drop off to avoid recirculating via Mount Pleasant Avenue, Pennant Hills Road and Osborn Road. E.g. traffic marshals, No Stopping restrictions.	As stated in the Operational Traffic Management Plan, traffic marshals will be used on site to direct vehicles to continue circulating. No stopping restrictions will also be in place along the internal roadways.
Confirm how management measures will ensure that impacts (if any) of drivers using the Osborn Road pick-up/drop-off facility requiring to recirculate are not exacerbated by the recirculation arrangements (i.e. point 8 above)	Traffic marshals will be in place to direct vehicles to recirculate and prevent queuing onto Osborn Road.
Environmental, Energy and Science Group	
Flooding Prepare a flood impact and risk assessment utilising Council's existing flood information to outline the base case overland flow behaviour for the full range of flooding up to the probable maximum flood (PMF)	The buildings proposed in stage 1 have been identified as being outside the extent of the PMF flooding. As such, a flood impact assessment or flood study is not required. Accordingly there is no flood mitigation or management required. These items have been discussed with EES Group by TTW in forming a response. EES Group requested the Civil Engineering Report be updated to include the above response within the report – see updated report at **Appendix B**.
Address developed scenario and assess the impact of the development on overland flow flooding and the impact of flooding on the development for the full range of flooding up to the PMF.	
Management Identify management options required to mitigate any adverse impacts from the development and identify development controls required in accordance to 1 C3.2 of the amended Council DCP	
Documentation Prepare an emergency response plan, including safety signs, at the school site near the flow path. The	It is suggested that a Flood Emergency Response Plan be included in the draft condition of consent. The Plan cannot be completed until the full development proposal have been confirmed during the detailed design phase (following consent) e.g. all access/egress points, floor levels/external levels, external landscaping etc

Summary of issue raised	Comment
preparation and implementation of an emergency response plan will help ensure the safety of students, teachers, parents, carers and other members of the school community during rarer flood events for the full range of flooding.	
Traffic Impact Assessment Peer Review	
There is no evidence of queuing analysis in the traffic report. A detailed microsimulation analysis or numerical queuing assessment would be required to clarify queuing issues. Inappropriate modelling platform has been used for the purposes of the assessment. A microsimulation platform would be recommended for further traffic modelling and assessment	In accordance with Austroads Guide to Traffic Modelling, microsimulation models are generally appropriate for large scale analysis (refer to Section 8.3 of Austroads Guide to Traffic Management art 3 Traffic Study and Analysis Methods). The proposed development is not of a significant scale such as to warrant development of a microsimulation model. Further, this has not been requested during consultation with both Transport for New South Wales and Hornsby Shire Council.
SIRA traffic model has not been validated in terms of queue length at both intersections, and should be undertaken in a network arrangement rather than isolated intersection modelling	Drone surveys were undertaken to validate intersection modelling during the preparation of the ELC development approval (refer to Appendix B in the Traffic RtS Report).
A pedestrian survey at the intersection due to numerous students crossing the signalised intersection should be undertaken	There are no crossings provided across Pennant Hills Road. Previous surveys of the intersection indicated that low pedestrian volumes were experienced at the signalised crossings due to the availability of the pedestrian overpass and the location of bus and train connections.
TTW traffic engineers have not undertaken a site observation to determine the local background traffic issues associated with Loreto	As stated in the previous traffic report TTW dated 15 January 2020 we were on site to observe the current pick up and drop off arrangement and also attended site numerous times during the preparation of the Response to Submissions reporting.
The GTP mode targets are aspirational and impractical and COVID has not been taken into account	Hornsby Shire Council's Community Plan 2013-2023 provides reference for travel targets within the Hornsby Shire Council Local Government Area for the year 2023. The 10 year goals dictated within the plan provided targets related to sustainable travel that Council aims to achieve (refer to Transport RtS Report Figure 3). These targets are more aspirational than those detailed in the Green Travel Plan. As part of Hornsby Shire Council's Integrated Land Use Traffic Study, a Car Parking Management Study was developed that addressed parking management within the Shire. Identified within this Car Parking Management Study was a trend away from vehicle usage, with public transport use growing 30% and car driver/passenger modes reducing by 4% over a five-year period from 2011 to 2016. This is also in line with the targets proposed within the Green Travel Plan. At this time, it is unclear what the lasting impact of COVID will be to transport in the future. The Green Travel Plan is a dynamic document that is continually updated per year to adjust to changing travel behaviours and therefore will be able to adjust to changing behaviour that may occur post-COVID.
A holistic Road Safety Audit of the surrounding road network during school time has not been undertaken	We note that a previous Road Safety Audit was conducted of the pick up and drop off as part of the ELC response to the Sydney Northern Planning Panel and has been attached in the RtS Report Appendix B.

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	A Road Safety Audit as part of a Condition of Consent has been requested by TfNSW in their response and is likely to form a condition of consent.
Hornsby Shire Council	
Planning	
The proposal seeks approval for building envelopes up to a maximum building height of 20.6m and 5 storeys which exceeds the 8.5m height limit for the subject site and surrounding low density area. The proposed boarding school building would front onto low-density residential dwellings and would not provide an appropriate transition in scale of built form as minimal front setbacks are provided to Mount Pleasant Avenue.	Amended and additional view and visual impact diagrams have been prepared by AJ+C and are provided at Appendix C of the Amended DA and original RTS dated 15 January 2020. The amended design seeks to mitigate concerns over bulk and scale and visual impacts of the proposal. In summary: Five additional views of the Boarding House along Mt Pleasant Avenue (Appendix C of Traffic RtS) show that the amended Boarding House will have an appropriate scale and visual relationship to the streetscape. Due to the topography (in which Mt Pleasant Avenue is generally higher than the school) the boarding house is only two to three storeys in height above the street, making the building visually appropriate in its context.
The boarding school building would appear as an unbroken building with a building length of approximately 150 metres. This would result in a scale and character that is not typical of a low-density residential zone. Consideration should be given to breaking the building mass and/or setting the building back further into the site to provide greater opportunity for deep soil planting along the street frontage. It should be noted that where residential buildings of 5 storey are permitted in Hornsby Shire, they are restricted to a maximum building length of 35m with indentations to provide variation to the building facades. The proposal does not satisfy Council's controls for landscaping, setbacks or built form and articulation.	The boarding house has been designed with a zig-zag shape to provide modulation and increased setbacks to the streetscape that includes tree planting and landscaping that will visually break down the building when viewed from the street. A series of 3D view models have been provided from multiple angles that demonstrate the building will not be visually intrusive or out of place in the streetscape. It is noted that Council's DCP does not apply to the development in accordance with Clause 42 of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*.
In the Department's assessment of the proposed breach in height, the Department should be satisfied that the scale and setbacks to boundaries proposed would cause negligible visual amenity impacts in relation to adjoining land uses and that the Clause 4.6 variation sought adequately addresses each prescribed element of Clause 4.6(3) and (4) of the Hornsby Local Environmental Plan 2013.	The proposal has been designed to ensure an appropriate height and scale with negligible visual amenity impacts (see Section 5.0 of the Amended Concept Plan and original RTS Report dated 15 January 2020). A Clause 4.6 Variation Request has been submitted with the proposal.
Heritage In summary, no heritage objections are raised to the revised Concept Proposal or revised Stage 1 DA on heritage grounds subject to the following conditions	Noted. The applicant will review draft conditions with the Department of Planning at the appropriate time.

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should the Department recommend approval of the application: (refer to submission)	
Trees Concerns are raised that 28 trees of medium to high retention value would be removed in the stage 1 development. These trees comprise native species including Spotted Gum, White Mahogany, Narrow-leaved Ironbark Grey Ironbark, Blackbutt, Swamp Mahogany, Sydney Blue Gum, Scribbly Gum, Paperbark and Turpentine. The trees are of good health and condition and contribute to the amenity of the site and surrounding properties. Should the Department recommend approval of the development, consideration should be given to replacement planting with new trees as part of stage 1 development. Furthermore, a landscape plan should be submitted that clearly indicates the species, location and number of replacement trees to be planted on-site.	The proposal seeks a net 1:1 planting replacement (see Section 3.4.3 of the Amended Concept Plan and Stage 1 RTS Report). It is expected that a condition reflecting this will be imposed to the DA.

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Traffic and Safety Council has received representations from some members of the community concerning traffic, parking and drop-off/pick-up arrangements associated with the current operation of Loreto Normanhurst School. A number of residents comment that the proposal to significantly increase student numbers will exacerbate these existing problems. In the Department's assessment of the traffic and parking impacts associated with the proposed increase in student population, the Department should be satisfied the following has been adequately addressed: Drop-Off/Pick-Up In the traffic report 6.1.2 it states that 'TTW has collected tube counts of the existing access and egress points into the School and conducted a site visit during a peak morning drop off period to observe current driver behaviour.' The traffic analysis and queuing survey appears to be only conducted during the morning peak, not afternoon peak. It should be noted that drop off behaviour is different from pick up behaviour since in the pick-up, parents often come to the school site early and wait for the children to arrive. Queuing of vehicles on surrounding streets that adjoin the School is an existing issue shared by residents and Council and has been observed to last for a long period of time and is the primary reason for long queues back to Osborn Road during the afternoon peak. The traffic report does not identity or discuss the queueing situation during PM pick up time.	The traffic count survey was also conducted during the afternoon peak as shown in Figure 6.1 of the original Response to Submissions report. As evidenced by the tube count survey, afternoon peak movements through the facility are approximately half of those in the morning peak. Nevertheless, traffic modelling has been conducted of the afternoon peak and detailed results are shown in Appendix B. As part of the ELC development, drone surveys were undertaken in September 2019 of the intersections of Osborn Road and Mount Pleasant Avenue with Pennant Hills Road. These drone surveys indicated a peak queue on Osborn Road of 9 vehicles and showed that queues cleared during each intersection cycle. A summary report has been attached in Appendix B of the Traffic Response to Submission.
In previous conversations with School representatives, it was established that the School does not currently open their access gate until the afternoon pick-up is about to begin. Prior to this, parents who arrive early sit idle in their vehicles on Osborn Road, queuing to access the School through the gates. This appears to start at least 30 minutes prior to pick-up. Currently the afternoon queuing travels down Osborn Road into the intersection with Pennant Hills Road. On Pennant Hills Road the queuing is in the northbound right turn lane (into Osborn Rd) and in the southbound lane three queuing to turn left into Osborn Road. The current allowance provided by the school is 4 pickup spaces	Loreto is aware of the current issues with the existing pick up and drop off facility accessed by Osborn Road, as such the relocation of this facility has been prioritised to occur in Stage 1 of the development.

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and only 3 queuing spaces. The existing queue reaches far beyond this onto the State Road.	
The School proposes that as the development stages progress and the School population increases, so will the additional requirement for queuing spaces. However, it is evident from the current operation of the School that the number of vehicles queuing is closer to the proposed allowance of 15 to 16 vehicles as estimated for the Stage 4 of the development and the existing capacity is already insufficient for current demand. As the population of the junior school increases, so will the desire for parents to have access to the School to pick-up primary aged children. The Department should consider bringing any proposal for works to reduce traffic queuing for drop off and pick up to Stage 1 or before any increase in student population is approved that would lead to an increase in vehicles to the School occur.	Vehicles queuing are a result of the lack of recirculation that currently occurs due to geometric constraints reducing use of the recirculation. Allowing for this recirculation and providing additional queuing area within the school site will eliminate the need to queue on the surrounding streets. The relocated Osborn Road pick up and drop off proposed as part of Stage 1 of the works will reduce traffic queuing, which is why it has been prioritised to the beginning of the development works.
The proposed future road link through the site has the potential to create other traffic and safety issues to the Mount Pleasant Avenue intersection which is not signalised. The through link would send traffic out to Mount Pleasant Avenue and the traffic would use the intersection of Mount Pleasant Avenue with Pennant Hills Road. This intersection is subject to many complaints regarding safety and delays and signalisation of the intersection at Mount Pleasant Avenue and Pennant Hills Road should be required should this application be approved as a condition of consent.	Loreto is aware that right turn movements at the intersection of Mount Pleasant Avenue and Pennant Hills Road have associated safety concerns. As discussed with Hornsby Shire Council during the preparation of the Response to Submissions Loreto is supportive of signalisation of this intersection, however TfNSW does not support this due to its proximity with the signalised intersection of Osborn Road and Pennant Hills Road. To reduce safety concerns, the OTMP provides a management solution such that only left turns will be required out of Mount Pleasant Avenue onto Pennant Hills Road as a result of Loreto traffic.
Increasing or relocating the internal queuing area would not address all traffic issues on Osborn Road at present or in the future. It is recommended that Osborn Road be widened to accommodate two traffic lanes along the School side as well as the proposals from traffic report.	Widening of Osborn Road was discussed with the Department of Planning, Industry and Environment. Widening would result in a significant loss to streetscape amenity along Osborn Road due to the required removal of a number of trees. The traffic issues on Osborn Road are a direct result of the deficiency in queuing area and lack of recirculation currently occurring within the school site. Once vehicles are able to queue internally to the school with the relocated Osborn Road pick up and drop off then improved capacity for the local street traffic will be experienced on Osborn Road.
On Street Parking The initial development plan states the School has approximately 300 members of staff, but only 179 car parking spaces on site. Council has observed that currently, a high proportion of the School staff and	As outlined at Section 5.4 of the Amended Concept Plan and Stage 1 DA RTS Report Stage 1 DA infrastructure delivery (construction of through site link and car parks) is proposed to be constructed in stages, as set out at Table 7. Infrastructure delivery will support population growth at the school.

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students park on the residential side of Osborn Road and Mount Pleasant Avenue. This observation is further confirmed by the Applicant in Section 4.3 Parking Supply document (page 12) whereby it is noted that the School currently has an existing shortfall in parking on campus. The Applicant proposes to manage this parking shortfall in the future through a proposed Green Travel Plan. While the Green Travel Plan is welcome, the proposal states that parking onsite will increase in stages in accordance with rising enrolments and staff numbers. In addition, the Staff Travel Surveys conducted for the initial development proposal in 2019, indicated that 89.1% of staff drive to the School, yet the current proposal does not come close to meeting the need for additional staff parking and would not address existing parking issues on surrounding roads as a result of the school enrolment and staff numbers. Additional parking provision to meet demand should be required prior to any increase in student and staff numbers.	To ensure the school delivers the relevant infrastructure in line with student population growth a condition of consent is proposed that will ensure the infrastructure is in place in line with population growth.
Footpath capacity The increased pedestrian movements will create a situation where the existing 1.2m wide footpath cannot safely accommodate pedestrians. In the Department's Assessment, consideration should be given to upgrading the footpaths adjoining the site to 2m width along the pedestrian desired lines. It is acknowledged that a plan should be submitted to demonstrate how a widened footpath in addition to an extra lane along the Osborn Road frontage of the site could be accommodated within the building setbacks. A plan showing the dedication of part of the site for the purposes of road widening to accommodate the proposal may be required.	The amended proposal seeks to internalise the traffic movements for the school, within the school boundaries which will alleviate demand on the external footpaths. Further a new internal through site link is proposed between Osborn Road and Mt Pleasant Avenue which will take significant pressure off the existing drop off arrangements which make the need for an extra lane and widened footpath on Osborn Road unnecessary. See project description at Section 3.2, 4.0 and Traffic Report at Appendix G of the Amended Concept Plan and Stage 1 DA Report.

Summary of issue raised	Comment
Public Interest Council has received numerous representations from residents in the locality objecting to the proposed development. The areas of main concern include traffic safety and car parking concerns. These views of the local community are supported and it is respectfully submitted that issues of traffic, parking and drop-off/pick-up of students should be appropriately addressed prior to any approval being granted for intensification of the use of the School.	Since the exhibition of the proposal and given the nature and range of submissions made from agencies and the public, the proponent, Loreto Normanhurst has extensively reviewed the overall approach and elements of the original Concept Proposal and Stage 1 application. This process was undertaken with close engagement with key stakeholders, including the Department, and has accordingly led to developing an amended Concept Proposal and Stage 1 design. The following key amendments have been made to the proposal: • Overall refinement of all building envelopes including deletion of the tallest building (Building 3) from the Concept Proposal to address the concerns relating to built form, heritage and landscaping; and • Inclusion of a new through site road link between Mount Pleasant Avenue and Osborn Road to allow for school drop offs to occur within the site and evenly distribute traffic, provision of additional on-site parking (a 72% increase) across Stage 1, and adoption of a range of Green Travel Plan measures that collectively will alleviate concerns around traffic and parking impacts. The Loreto Normanhurst Concept DA and associated Stage 1 works provides a new 30 year framework to guide the future renewal and upgrades across the campus. The amended proposal balances the School's growth strategy whilst protecting the heritage, ecology and aesthetically significant qualities of the campus and managing the traffic and parking impacts of its operations. The proposal responds to the strategic planning directions of the Greater Sydney Region Plan and the North District Plan which identify the need to accommodate a 20% increase in school enrolments by 2036 within the North District area of Sydney.
Transport for New South Wales	
Reference is made to your correspondence dated 18 February 2021, regarding the abovementioned Application which was referred to Transport for NSW (TfNSW) for comment. TfNSW has reviewed the submitted information and requests the following requirements to be included as conditions in the development consent: (see TfNSW submission for conditions)	Noted. The project team will review and respond to the draft conditions of approval provided by the Department at the appropriate time.

1.0 Schedule 1 – Statutory Requirements

1.1 Draft Housing Diversity State Environmental Planning Policy

The Draft Housing Diversity SEPP will introduce a new definition for purpose-built student housing. **Table 2** provides an overview of the proposal against the draft provisions for key development standards for student housing with respect of the boarding house building. It is important to acknowledge that the proposed provisions are indicative only and subject to further refinement and resolution by the Department.

Table 2 Draft Housing Diversity SEPP Review

Development Standard	Proposed Standard	NSW Department of Planning, Industry and Environment's Comment	Assessment
Height of buildings	In accordance with the relevant LEP	Maintaining LEP standard will ensure that new development is compatible with local character and consistent with community expectations.	The boarding house will exceed the 8.5 metres height control under Hornsby Local Environmental Plan. An amended Clause 4.6 Variation request is provided to reflect the amended development. Clause 42 of the Education SEPP permits that development consent may be granted for the purpose of a school that is SSD despite the contravention of a development standard imposed by an Environmental Planning Instrument (EPI), in this case being the height of buildings standard imposed under the Hornsby LEP.
Floor space ratio	In accordance with the relevant LEP	Maintaining LEP standard will ensure that new development is compatible with local character and consistent with community expectations.	The Hornsby LEP does not assign the site with a Floor Space Ratio Standard.
Car Parking	No minimum spaces required	Developers can choose to provide on-site car parking but there will be no minimum number of spaces required and a consent authority will not be able to refuse an application on the basis of car parking. It is expected that councils will permit student housing in areas that are in close proximity to educational establishments and the demand for on-site parking will be minimal.	The student housing is provided 32 parking spaces (including 2 accessible)
Bicycle Parking	1 space minimum per 3 bedrooms	The minimum bicycle parking rate will be a nondiscretionary, 'must not refuse' provision.	The boarding house has 125 bedrooms which would require 42 bicycle parking. 15 bicycle parking spaces are provided in the Boarding House basement with 5 existing spaces in front of the Mary Ward building.
Motorcycle Parking	1 space minimum per 5 bedrooms	The minimum motorcycle parking rate will be a non-discretionary, 'must not refuse' provision.	No motorbike spaces are proposed for the development. It is not within the nature of primary and secondary school student boarding house to provide motorbike spaces.

Development Standard	Proposed Standard	NSW Department of Planning, Industry and Environment's Comment	Assessment
Room Size	Minimum 10 m^2	The minimum room size is based on similar standards in other jurisdictions and reflects current industry practice, which is to provide a range of room options in a single development, including rooms that have an area of less than 10 m^2. The proposed 10 m^2 standard will be a discretionary standard. This will allow developers that wish to, to demonstrate that a smaller area has adequate internal amenity and that shared facilities are available to compensate for the smaller room size.	All room sizes are larger than 10m^2.
Communal Area (indoor)	15 m^2 per 12 students	High quality indoor communal space must be provided to meet the study, social, and religious needs of students. Depending on the size of the development, multiple rooms could be appropriate.	The boarding house is complying with this standard. The total indoor communal area of 1043.1 allows 87m^2 per 12 students.
Communal Area (outdoor)	Consider access to open space	In locations that are within 400m of the relevant university, it may be possible to rely on the open space that is provided on campus. In other locations the new SEPP will recommend 2.5 m^2 of outdoor space per student.	Boarding students will have access to 13ha of open space within Loreto campus. This will result in 39m^2 outdoor space per student.

2.2 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP)

An assessment of the proposed development against the Education SEPP has been conducted as part of the Environmental Impact Statement section 6.1.1 dated 18 June 2019. Ethos Urban has assumed the Departments request relates to the Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 Explanation of Intended Effects (November 2020). This assessment is contained in **Table 3.**

Table 3 Assessment of Draft Educational SEPP Explanation of Intended Effects (November 2020)

Description of Issue and Proposed Change	Effect	Comment
Definitions	None	The amendment does not affect the proposal definition.
Clarification of terms in vegetation clearing clause	None	The proposal is not Development without Consent.
Correcting cross referencing	None	The amendment does not affect the proposal.
Updating Department names	None	The proposal is not Development without Consent orComplying Development.
Clarifying permissible uses on State land	None	The proposal does not rely on Clause 16 of the SEPP.
Clarifying circumstances where schools can be expanded	None	The proposal does not rely on Clause 16 of the SEPP.
Restricting childcare centres within close proximity of each other in low density residentialzones	None	The proposal does not seek approval for a Child Care Centre.
Bush fire prone land	None	The proposal is not Complying Development.
Enabling student housing on sites with existing educational establishments	None	The proposal seeks student housing on an existing educational establishment. The proposal is in compliance with the Draft Housing Diversity SEPP

Description of Issue and Proposed Change	Effect	Comment
Planning pathways for development affected by a10% student cap	None	The proposal is not Development without Consent.
School development permitted without consentfor two-storey buildings	None	The proposal is not Development without Consent.
Clarification regarding application of conditions ofconsent	None	The proposal is not Development without Consent orComplying Development.
Directional signage and information boards	None	The proposal is not exempt development.
Exempt development standards for school-basedchild care	None	The proposal is not exempt development.
Timeframes for short-term portable classrooms(e.g. demountables) as exempt development	None	The proposal is not exempt development.
Teaching facilities to include classrooms	None	The proposal is not Complying Development.
Canteens as complying development	None	The proposal is not Complying Development.
Allowing shops selling school related supplies	None	The proposal is not Complying Development.
External property boundaries	None	Change is noted for interpretation however does not affect theproposal.
Tertiary institution development permitted withoutconsent for two-storey buildings	None	The proposal is not a University
Innovation spaces/hubs within existing tertiaryinstitutions	None	The proposal is not a University
Landscaping associated with new development	None	The proposal is not Complying Development.
Garbage and waste storage	None	The proposal is not Development Without Consent, ComplyingDevelopment or a University
Retaining walls and earthworks	None	The proposal is not Complying Development.
Measuring noise impacts for complyingdevelopment	None	The proposal is not Complying Development.
Complying development over registeredeasements	None	The proposal is not Complying Development.