

11 February 2021

17074

## Loreto Normanhurst – Response to Public Submission

Issue raised	Response
Student Increase and Growth of School	
Concerns the increase in student numbers from 1150 to 2000 is out of line with the projections of student numbers supplied by the school when lodging previous applications.	The school population is proposed to increase to a population that is appropriate for a major educational institution and the growth is proposed to facilitate the school's growth into the future. An amendment has been made to the proposal to reduce the size and extent of envelopes and major infrastructure works are now included in the Stage 1 scope to internalise parking and pick u p and drop off, reducing the impact on the locality. assessment of the impacts of that population has been carried out including traffic and parking impacts. Also, student amenity in terms of open space provision and class space per student far exceeds the guidance requirements under the Educational Facilities Guidelines. The RTS confirms the school has the capacity to support the growth and the impacts can be appropriately managed. Refer to the summary at the RTS report.
Increase in students will create large increase in pedestrian and vehicular traffic and would have substantial impact on amenity of surrounding residential streets.	
There would also be an increase in staff to support the student growth, which would also increase the impact.	
The proposal of growth creates a high-density school population within a low density living area.	
Traffic	
Intersection of Mount Pleasant Avenue and Pennant Hills Road Impact to traffic in Mount Pleasant Avenue (Mount Pleasant) and the intersection with Pennant Hills Road (Pennant Hills), during the development phase and post the development.	Trip distribution and trip generation have been revised from the original Transport Impact Assessment to reflect the revised pick up and drop off arrangements as well as the changes to parking around the site. These revisions have included traffic impacts to Mount Pleasant Avenue.
Mount Pleasant Avenue and Pennant Hills Road should be signalised.	Signalisation of Mount Pleasant Avenue and Pennant Hills Road is supported by Loreto, however it is not permitted by RMS due to its proximity to the signalised intersection at Osborn Road.  During the staged development of the School, Loreto will continue to discuss the potential signalisation of this intersection with RMS during the development application process. With the future changes to Pennant Hills Road as a result of Northconnex future signalisation may become a possibility, however this will be subject to future approval by RMS.

Issue raised	Response
<p>Compounding developments at Mount Pleasant Avenue will combine to add to traffic congestion including developments approved at 51A Mount Pleasant Avenue and a subdivision currently under approval at 53 Mount Pleasant Avenue. The Wahroonga Estate Project Precinct A has already been approved at the southern end of Mount Pleasant Avenue and is pending construction.</p>	<p>The Statement of Environmental Effects of the development of 51A Mount Pleasant Avenue states “None of the residents will drive a vehicle so the role of the support staff is to also transport residents to activities and services they want to use in the community. Traffic and noise levels will be to a residential household.” This development is a single storey group home comprising of 5 bedrooms and is replacing an existing residence. As a result it will have limited traffic impact.</p> <p>53 Mount Pleasant Avenue proposes the subdivision of one resident into two, which is expected to have limited traffic impact.</p> <p>The Wahroonga Estate Project has been approved in concept only as part of the master plan. When the detailed development approval is undertaken, a traffic impact assessment will be required to review the operation of the intersection of Mount Pleasant Avenue and Pennant Hills Road post development.</p>
<p>The traffic report does not address additional trips that will move through the Mount Pleasant Avenue/Pennant Hills Road intersection as a result of on street parking.</p>	<p>The trip generation has been updated in this report to include impacts to Mount Pleasant Avenue and adjusted for the additional car parking proposed.</p>
<p><b>Inadequate Pick Up and Drop Off</b> The school should implement an on-site parking area sufficient for all staff and students including a kiss and drop off area.</p>	<p>The revised master plan includes additional car parking sufficient for staff demand and improved pick up and drop off. The Stage 1 works include additional car parking to account for the current shortfall of on site parking at the start of the master plan.</p> <p>Loreto aims to reduce single occupancy vehicle trips through the implementation of a Green Travel Plan. This Plan has a large focus on reducing student vehicular trips.</p> <p>Additional pick up and drop off provisions are proposed as part of Stage 1.</p>
<p>Improved access for student drop-off/pick-ups is completed via Pennant Hills Road, instead of Osborn Road or Mount Pleasant Avenue. There should be an entirely internal access way to the school which does not impinge on neighbouring residents eg. entry and exit exclusively from Pennant Hills Road.</p>	<p>The RMS aims to prioritise through movements on Pennant Hills Road to reduce congestion. As a result, they prefer to remove additional connections from Pennant Hills Road. This is reflected in their request to remove the existing access driveway into Loreto from Pennant Hills Road.</p> <p>Additional access driveways from Pennant Hills Road are therefore unlikely to be approved by RMS.</p>
<p>Assurance should be given that the car park at 92- 94 Pennant Hills Road (associated with the Church of Jesus Christ of Latter-day Saints) will not be used for pick-ups and drop-offs of students. The Church currently experiences a significant amount of traffic across its property from parents of children attending to the Normanhurst Public School.</p>	<p>Additional pick up and drop off facilities are proposed internal to Loreto which will prevent pick up and drop off manoeuvres occurring off site.</p>
<p><b>Inadequate Parking</b> Loreto utilises unlimited parking conditions in the surrounding streets to accommodate a lack of onsite parking. The development needs to address street parking and traffic conditions that will be created by this development</p>	<p>Projected parking demands have been reviewed throughout the master plan and additional parking proposed.</p> <p>As part of the Stage 1 detailed application, additional parking is proposed to address the existing shortfall of on site parking.</p>

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<p>Parking should be provided within the school for students, staff, parents, drop-offs, etc. and that no kerbside parking at all be allowed for school purposes.</p>	<p>As above.</p> <p>The Operational Traffic Management Plan has detailed allocation of parking within the site to provide for staff and students. Loreto is also committed to implementing the Green Travel Plan to reduce single occupancy vehicle trips and reduce parking demands.</p>
<p>During events days parents and guests park in Carrawong Avenue, a small in width street.</p>	<p>The Operational Traffic Management Plan details the use of the sports field for overflow parking. Additional parking provision on site will also assist in parking occurring on local streets during events.</p>
<p><b>Safety of Mount Pleasant Avenue and Osborn Road</b>  Traffic calming and safety issues in Mount Pleasant Avenue. The proposed development will increase the traffic and parking burdens and therefore increase the already hazardous and unsatisfactory traffic and parking situation in the surrounding "no through" roads.</p> <p>There being no exit from Mount Pleasant Avenue other than onto Pennant Hills Road means that school traffic needs to make a 180 degree turn often by nosing into a vacant driveway then backing out. This presents a danger especially for students</p>	<p>At all entrances to Loreto provision is made for vehicle to enter and exit in a forward direction. Additional pick up and drop off facilities on site will prevent informal pick up and drop off movements occurring on Mount Pleasant Avenue.</p>
<p>When cars are parked on both sides of Mount Pleasant Avenue there is insufficient space for cars travelling in opposite directions to pass each other. Access to Pennant Hills Road is reinstated via Nepean Avenue, to relieve increased local traffic on Osborn Road.</p>	<p>Local traffic flows such as reinstatement of the Nepean Avenue/Pennant Hills Road intersection is ultimately up to Hornsby Shire Council and RMS.</p>
<p><b>Intersection of Osborn Road and Pennant Hills Road</b>  The traffic report claims the Osborn Road 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.</p>	<p>With reduction in the Pennant Hills Road through volumes, there is less demand on the phase of the intersection catering for this movement. As a result, greater green time can be provided to side roads from Pennant Hills Road.</p>
<p>The intersection of Osborn Road and Pennant Hills Road 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. The number of lanes in Osborn Road should be increased to at least five lanes.</p>	<p>The through site link provided from Osborn Road to Mount Pleasant Avenue will alleviate impacts to the Osborn Road/Pennant Hills Road intersection by further distributing traffic flows generated by the School.</p> <p>Loreto is committed to implementing Green Travel initiatives to reduce the number of vehicle trips to and from the School to ameliorate impacts on the local road network.</p> <p>Further, the widening of Osborn Road has been investigated and it would require removal of a number of significant trees which would reduce the amenity of the streetscape.</p>
<p>Retention of the left hand turn after stopping for traffic exiting Osborn Road to Pennant Hills Road.</p>	<p>This was requested to be removed by RMS due to safety concerns.</p>

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Loreto should be required to construct a road through their property with direct access to Pennant Hills Road leaving Osborn Road for resident's access.	The RMS aims to prioritise through movements on Pennant Hills Road to reduce congestion. As a result, they prefer to remove additional connections from Pennant Hills Road. This is reflected in their request to remove the existing access driveway into Loreto from Pennant Hills Road. Additional access driveways from Pennant Hills Road are therefore unlikely to be approved by RMS.
<b>Traffic Generation and Modelling</b> The traffic report has made an assumption that staff numbers will increase by 77 based on an unreferenced ratio of 1:10 (staff to students). This ratio is questionable for private schools.	The revised staff projections have been provided by Loreto and are based on anticipated staffing requirements as part of the increased classroom requirements.
The Traffic Report does not use consistent student numbers with the School's projections.	Projections have been used in this report that have been provided from Loreto
The SSD-8996 is part of stage 1, which means there are many more stages Loreto has planned.	This State Significant Development Application seeks approval for a Concept Master Plan and a Stage 1 Detailed Development. Increased student and staff numbers that are proposed as part of the future stages have been accounted for within the Concept Master Plan.
Tangible incentives are provided to promote public transport usage for students and teachers.	Loreto is committed to implementing the Green Travel Plan that has been included as part of this Response to Submissions.
Traffic counts were conducted during the closing days of term 3 2019 including one day when the only students at the school were boarders.	Updated SIDRA models have been prepared that rely on SCATS volumes from Thursday the 7th of November 2019 while the School was in typical operation.
<b>Inadequate Bus Facilities</b> The bus bay is not long enough for all the buses servicing the school and parents are using this facility. Parents need a separate space or road lane and much longer than the bus lane.	The relocation of the existing pick up and drop off facility from the slip road will provide additional length for bus layover. This will also allow for separation of bus and parent/carer vehicle movements.
Frequently buses and cars are banked up on Pennant Hills Road awaiting entry into Osborn Road at school pick up times.	The improved pick up and drop off facilities proposed as part of the Stage 1 detailed development will increase queuing capacity within the site which will avoid overflow queuing into Osborn Road.
<b>Bulk and Scale</b>	

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The EIS does not adequately address the height of buildings provision of the LEP. It is not adequate justification to only name nearby schools zoned Sp2 as a justification to not comply with the height limit of the site's R2 zoning. Several schools in the vicinity (Hornsby South Public School, Normanhurst Boys High School etc.) are in R2 Low Density Residential zones.	<p>The amended Concept Plan and amended Stage 1 DA continues to propose built form that 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.</p> <p>Clause 42 of the Education SEPP permits that development consent may be granted for the purpose of a school that is State Significant Development 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.</p> <p>The amended Concept Proposal and Stage 1 DA has been significantly revised with removal of envelopes, reduced envelope and building heights and increased envelope and building setbacks to ensure the bulk and scale is in keeping with the school context and relationship to its residential neighbours and heritage considerations. An assessment of environmental impacts of the building height including overshadowing and view and visual impacts is provided below that confirms the environmental impacts are acceptable.</p>
Boarding House	
The size and siting of the six-storey boarding house is out of keeping with surrounding residential bungalows and would dominate what is currently an old residential area.	Five additional views of the Boarding House along Mt Pleasant Avenue (Appendix X) show that the amended Boarding House will have an appropriate scale and visual relationship to the streetscape.
The building is located too close to Mound Pleasant Avenue and should be set back. If the boarding house was set back, there would be more room for landscaping and trees to ameliorate the visual impact of the boarding house	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 original designs for the boarding house was a two-storey building, which is no longer the case	The design has been amended to enable the retention of more trees and inclusion of additional tree planting in the street setback that will ensure the boarding house sits within a landscaped setting.
Early Learning Centre	
Objection to the ELC which has been assessed by Hornsby Shire Council. The ELC has been included in the drawings but not in the notification. This ELC will create additional traffic and difficulties on Mt Pleasant Avenue.	The ELC is shown in the plans for context only as the DA was approval by Council since the original SSD was submitted to the Department. The ELC does not form part of the SSD application. The parking strategy under this SSD accounts for parking to be provided on campus for the ELC.
The traffic impacts of the ELC have not been included in the assessment of traffic impacts as part of this Stage 1 application.	
Noise	
Concerns regarding the noise impacts of the school.	The SSD application has undertaken as assessment of the works proposed by this application at in the Noise and Vibration Assessment.

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<b>Landscaping</b>	
Concerns over the presentation of the school to the street and streetscape and removal of vegetation.	<p>Whilst the Concept Plan does not identify landscaping, the consideration of landscape works will be a requirement of any detailed DA under the Concept approval. Landscaping is proposed as part of the Stage 1 DA (physical) works that seeks to ensure the school has a positive relationship with the street, streetscape and public domain.</p> <p>The removal of vegetation a concern for the school and accordingly the design has been amended to enable the retention of a large number of trees. The avoidance of all tree impacts is not possible due to the high constraints of the school however the school has committed to the replanting of all trees that are removed. A condition of approval is proposed in this regard.</p>
<b>Other</b>	
Notification was inadequate – the neighbours did not receive any notification by letter and there was no street signage either. This reflects Loreto Normanhurst's sense of entitlement and disregard for its neighbours.	Additional community consultation was carried out in August – November 2020 to ensure the community was aware of the proposal and to provide genuine engagement with the community by Urbis and a summary of the notification process is provided at <b>Appendix F</b> .
Concerns that residents are not being heard – why don't authorities take rate payers objections seriously?	
Lights from (permanent) demountables on Osborn Road stream into residents bedrooms all night	The proposal does not seek approval for (permanent) demountable lighting.
All schools must have a Student Management Plan to supervise students as they arrive and depart the school. A Student Management Plan is required for this application.	An Operational Management Plan is provided at <b>Appendix G</b> .
Based on our previous experiences with construction of the pool building, additional class rooms, landscaping and building extensions and renovations – we fear the unhealthy impact from dust, noise, heavy trucks and car exhaust will be very dangerous health conditions for school kids and neighbours.	A Construction Management Plan is included at <b>Appendix U</b> that outlines the management measures and principles that the construction program will implement to mitigate impacts. The detailed Construction Environment Management Plan will form a condition of approval by the Department of Planning.
Lack of information re usage of proposed buildings – will buildings such as the Pavilion be used at night/day, what are the noise issues etc.?	At this stage the Concept does not propose specific uses as that will be resolved by the detailed DA under each application under the Concept approval. All uses will be in accordance with the uses that are Education Use or uses that are ordinarily ancillary to that use in accordance with those permitted under the Education SEPP. Indicative uses are identified in the Design Report at <b>Appendix C</b> for information only.
Neither the EIS nor any supporting documentation addresses the impact on the surrounding community.	The EIS and RTS and the supporting consultant documentation has carried out an environmental assessment of all impacts from the proposal, including built form, view and visual impacts, overshadowing, traffic, noise, heritage and the like.
The school does not honour its previous promises to residents e.g. it was promised to residents that the pool would not be used for commercial purposes – now it is used for public swim school etc.	This is outside of the scope of this application.

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<p>Bushfire report provided with EIS is out of date and was prepared prior to the catastrophic bushfire season experienced over Summer 19/20. No emergency and evacuation plans have been prepared for Loreto. This combined with the existing traffic issues and lack of access for emergency vehicles will create catastrophic outcomes.</p>	<p>The Bushfire assessment has been carried out in accordance with relevant legislation.</p>