SUBMISION RE SSD-8996

AMENDED STATE SIGNIFICANT DEVELOPMENT APPLICATION – LORETO NORMANHURST SCHOOL REDEVELOPMENT (CONCEPT PROPOSAL AND STAGE 1)

OBJECTION TO PROPOSAL

I object to the Development proposal for the reasons of:

1. **Impact on the intersection of Mt Pleasant Ave and Pennant Hills Rd,**
2. **Height and use of the boarding house (Envelope 1), and**
3. **Need for clarification of construction traffic arrangements.**

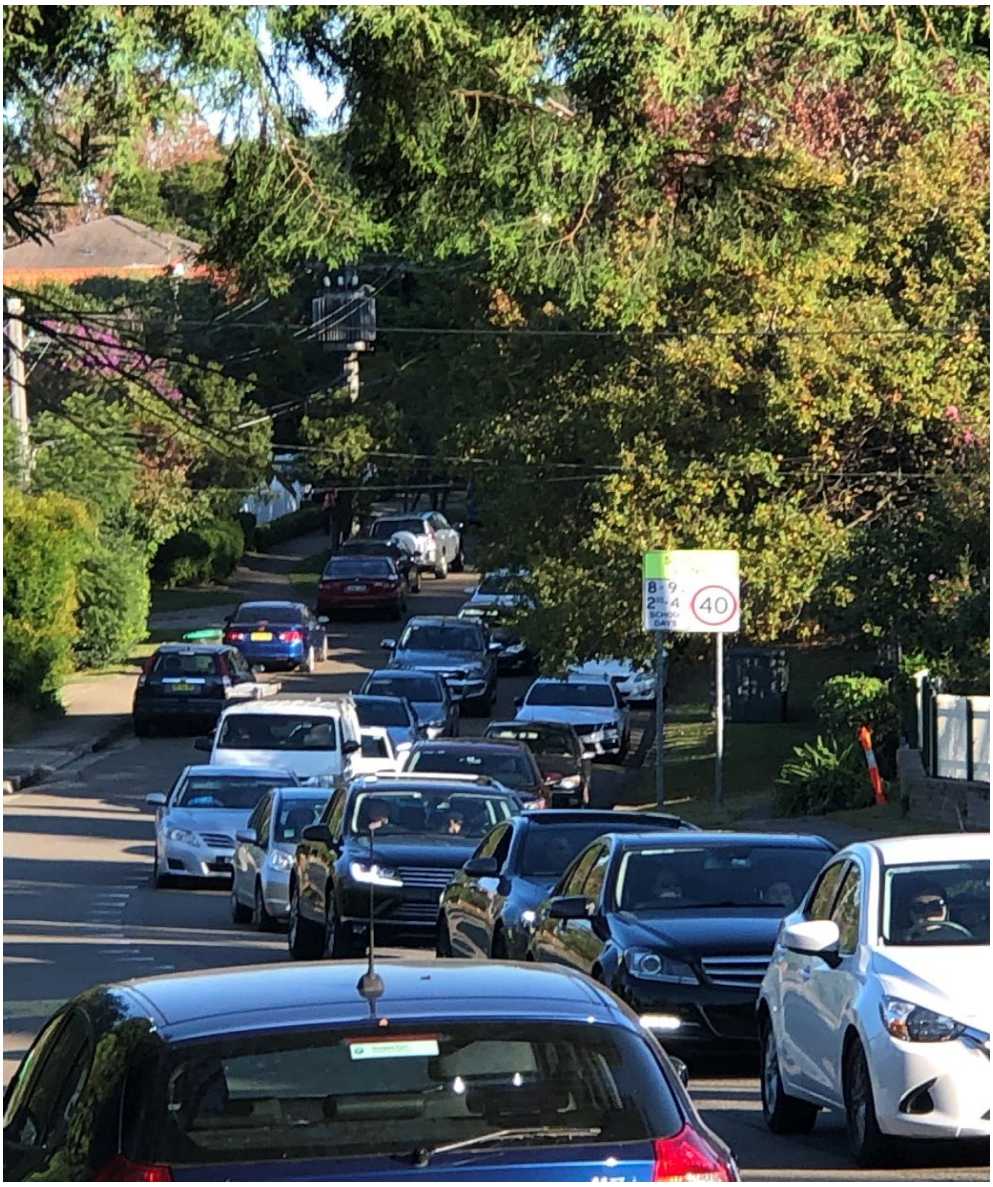
1. INTERSECTION OF MT PLEASANT AVE AND PENNANT HILLS RD

Under Loreto's amended State Significant Development Application (**SSD Application**), Mount Pleasant Ave (**MPA**) will bear half the school pickup and drop-off traffic, all the early learning centre (**ELC**) traffic, all student driven traffic, all teacher traffic and an indeterminate amount of the construction traffic. This is a major transfer of traffic load from the intersection of Osborn Rd and Pennant Hills Rd (PHR) (a signalised intersection currently operating at level B) to the intersection of MPA and PHR (an uncontrolled intersection currently operating at level F) (**MPA Intersection**). In addition, traffic will grow by 40% with the increase in student population foreshadowed in This Application. I do not believe that the proposals in This Application would solve Loreto's traffic issues, they would just transfer them, and I believe that they would greatly exacerbate problems at the MPA Intersection.

- Intersection delay is a measure of intersection safety and is of particular importance to residents as MPA is a dead-end street. Residents must leave and return to their homes via the MPA Intersection.
- The SSD Application proposes that all student traffic, all teacher traffic, all ELC traffic and 50% of the school pickup and drop-traffic will leave via MPA. This would be a huge increase in traffic volume at the MPA Intersection.
- Transport for NSW and Hornsby Council are well aware of the safety issues at the MPA Intersection and have held many discussions with residents over the years. There were seven major accidents including one fatality in the three year window considered in the traffic analysis for the ELC and for the SSD Application. I recall that it was because of this issue that Transport for NSW asked for ELC pickup and drop-off traffic to be shared equally between MPA and Osborn Rd (rather than being carried entirely by MPA as originally proposed by Loreto) and that this sharing was reflected in the ELC approval. The SSD Application would reverse the sharing requirement with all ELC traffic now entering and leaving via MPA. Nothing in the SSD Application explains why this was previously unacceptable but should be considered acceptable now. In addition to the extra ELC traffic, Stage 1 of the Loreto development would add more than one hundred extra vehicle movements out of the intersection each school day during each peak period, this is unacceptable for an intersection already operating at level F.
- Intersection analysis for the SSD Application models performance on an overall intersection basis and by individual leg (eg the Mt Pleasant Ave leg). The results for show that the

intersection is already operating well into the worst category, that is Level F, and that this is driven by turns out of Mt Pleasant Ave. Although the analysis can't distinguish between left out and right out, the SSD Application concludes that the only problem is the right turn out and, apparently, that if this turn is removed then the intersection would have the capacity to handle a great deal more traffic. This assumption is based on measured delay time for left turns during a short window on one day in June 2020 which was during the Covid-19 lockdown if I recall correctly. Either way traffic along PHR (and MPR) was exceptionally light at that time and was not representative of normal operation. The measured delay was 11 seconds but corresponding right turn delays are not reported. Given the highly unusual conditions at the time of measurement, a corresponding measure for right turns is the only way to put the left turn result into any useful context and to get a sense of whether it is one or both turns that are problematic. Without this additional information the left turn measure is of no value.

- Experience, safety analysis and accident statistics, do not support the conclusion that only the right turn out of MPA is problematic:
    - I have attached a photo taken a little earlier in the lockdown (May 11) when Loreto directed its pick-up traffic to depart via MPA and turn left onto PHR. On that day traffic was queued on PHR waiting to turn into MPA (MPA, with cars parked on both sides, is too narrow to allow passing) and the queue waiting to turn left onto PHR extended for 500m – the photo below shows the first 100m looking back from a little south of the MPA Intersection. A teacher who was trying to manage traffic at the intersection, with assistance from two residents, had to regularly stop traffic at the intersection to allow students from Normanhurst Public School, Loreto and Normanhurst Boys High to cross MPA (there is no pedestrian crossing and conditions at the intersection were chaotic). The situation was clearly dangerous for all concerned and especially for the younger children.
    - An intersection safety audit prepared for and submitted with Loreto's original application noted that turning out of a residential street to merge into fast moving traffic on a major arterial road is inherently dangerous. It also noted that sightlines for the left turn out of MPA are poor due to a five foot high brick fence at the corner and to overhanging branches of trees (mostly on private property to the east along PHR). Additionally, the geometry of the intersection dictates that a left turning vehicle leaving MPA will face a little towards the west requiring the driver to look back over his shoulder to see oncoming traffic and because of the sightlines and geometry of the intersection some drivers have to move a little into the intersection to decide if it is safe to turn (the safety auditor's report included a photograph of a vehicle doing this). Nothing is proposed in the SSD Application to address these problems despite the planned dramatic increase in the number of vehicles turning left out of MPA.
    - Major accident statistics do not support the conclusion that restricting right turns out of MPA will make the intersection safer. Seven major accidents, including a fatality, were recorded in the review period considered for Loreto's Application. They were associated with either left turn out of MPA, straight through along PHR or right turn into MPA. None were associate with the right turn out of MPA.



- Given the length of the queue along MPA on 11 May it seems unlikely that the internal link road will be of adequate length for the volume of traffic exiting via MPA and if it is not then the link road will quickly fill. It is not clear from the SSD Application how this eventuality will be handled and it will occur if the MPA Intersection does not clear efficiently during peak times.
- Going around again for cars to pick up or drop off a child via the link road could be a lengthy and frustrating process and it could even happen more than once (link road, MPA, MPA Intersection, PHR, Osborn Rd intersection, Osborn Rd and back onto the link road). This needs to be avoided or parents will go back to picking up and dropping off in surrounding streets. This means that there must be substantial redundancy in pickup/drop off points.
- Previous studies have shown that approximately half the vehicles leaving MPA turn right into PHR and half turn left so a requirement for all traffic to turn left would roughly double the left turn volume before adding the traffic generated by Loreto's developments. As both turns currently operate in parallel, stopping the right turn out of MPA would most likely increase overall waiting times substantially.

- The Adventist retirement and aged care complex at the end of Mt Pleasant Ave is to be expanded as the final phase of an approved SSD (**Mt Pleasant Precinct**). All other phases have either been completed or are currently under construction. The application for that SSD included a detailed traffic analysis for the MPA Intersection. Loreto's Application effectively disregards the Mt Pleasant Precinct except to state that it will be subject to further traffic analysis. Given the existing preliminary approval of the Mt Pleasant Precinct, the obvious necessity for all associated traffic to enter and leave via the MPA Intersection and the advanced stage of the overall project, it seems certain that the Mt Pleasant Precinct will be allowed to proceed and the traffic it generates will add to traffic at the MPA Intersection (there is no alternative). Logically the SSD Application should include all traffic generated by the Mt Pleasant Precinct in its own traffic analysis.

2 - THE BOARDING HOUSE (ENVELOPE 1)

- I am pleased to see that the boarding house has been reduced in height but I believe that it is still too high to be in keeping with the surrounding streetscape. I think that no part of the building should be more than two stories above ground.
- I notice that it is proposed that the dining room be available for external use. There is no indication of what this entails but presumably it could permit use as a commercial function facility whenever not being used for school purposes. I think there is no allowance for the traffic it would generate as a commercial facility in the traffic analysis. I believe that non-school use should not be permitted.

3 – CONSTRUCTION TRAFFIC

No guidance is given regarding entry and exit of construction vehicles other than to require the Principal Contractor to submit a proposal. I don't believe this is adequate. For previous construction jobs at Loreto, construction trucks have came in via MPA and entered the site at the bottom gate in MPA. They then delivered their load at a temporary transfer site near the gate from where it was transferred to the parking area which will now be known as P4, by conveyor, for final distribution around the site. Trucks left via a temporary road across the bottom of the Loreto oval and departed via Osborn Rd. This worked well and it avoided having large trucks turn into and out of P4 (at the top of the hill and at a bend in the road in MPA) and it shared the burden between MPA and Osborn Rd. It also brought the trucks back out onto PHR at lights. I suggest that a similar arrangement be required of Loreto as a condition of approval for the SSD Application.

CONCLUSION

Traffic matters are key to making the proposed development work. As operation of the MPA Intersection is now highly unsatisfactory (well into Category F) it is not okay to add a lot more traffic when analysis shows it will put the intersection even deeper into Level F. I believe there are only three ways to proceed:

1. Transport for NSW agrees to signalise the MPA intersection before Stage 1,
2. Loreto provides the land and funds to widen Osborn Ave from the PHR intersection to the bottom gate and all additional traffic goes in and out through Osborn Rd, or
3. Loreto rethinks its long term strategic plan.