

**To:** Independent Planning Commission: Level 3, 201 Elizabeth Street, Sydney, NSW 2000, Phone: (02) 9383 2100, Email: [ipcn@ipcn.nsw.gov.au](mailto:ipcn@ipcn.nsw.gov.au).

**From:** Matthew Gee  
[REDACTED]

**Date:** October 4, 2021

### **Written Submission to the IPC re Loreto SSD 8996**

Dear Commissioners Adrian Pilton, Juliet Grant and Wendy Lewin,

Thank you for taking the time to read this submission.

- I draw your attention to uploaded *Greys Mark II Peer Review* dated 20 September, 2021. This second peer review commissioned by concerned residents is in response to the Bitzios Peer Review which has referenced Greys Mark II but has done a poor job in trying to dismiss it. The Applicant's modelling seems flawed in many aspects. Software modelling validated by selective drone footage on a day when some of the school was away on an excursion and year 12s had already finished, smacks of an overly simplistic analysis that simply cannot, and should not, be relied upon.

Other residents have addressed major problems associated with the development application, such as pedestrian safety, the inadequacy and over-reliance by the Applicant of the GTP, bulk and scale and biodiversity but in this submission I would like to address two things that have concerned me as I have read the DPIE Assessment report.

[1] the maths the Applicant, their representatives and the DPIE does not reveal and

[2] the maths they do reveal, but have wrong

#### **[1] The maths they don't reveal**

This matter has been referred to the IPC as there were significant community objections. Most of these I note are from residents from surrounding streets.

- There are about 200 homes in MPA, Osborne Rd and its 5 feeder streets Currawong Ave, Nepean Ave, Rivertop Cl, Wendy Ave and Dunbar Cl. According to \* ABS stats for Normanhurst, only about 130 of these would be owner-occupiers, the rest are renters. It is fair to say that it is mainly going to be owners that object to DAs.

There were 78 objections to the Applicant's RtS and amended proposal exhibited from 23 February to 8 March 2021 (15 days). Fair to say then **that's 60%** of owners from all surrounding streets who have objected to this development.

That's high and higher still when you consider that some owners would have only moved in in the last couple of years and due to COVID have not experienced the full extent of the school's traffic wrath. There are also the folks to be taken out of the mix that have simply given up, disillusioned by years of being worn down by Loreto's constantly changing DAs.

And the mix is further reduced by residents who send their kids to Loreto and would hardly want to be seen to be objecting to them.

To have **way over 60%** of affected residents complaining is highly significant and it should indicate to the IPC just how deep this community objection runs. (1 min30)

Obviously, the Applicant has not presented the DPIE such data as it is damning for them, but it needs to be acknowledged and considered by the IPC.

**[2] The second thing that concerns me is the maths the Assessment Report does reveal, but has wrong**

\* The queuing analysis of cars on Loreto property is flawed, yet it has been accepted by the DPIE. The analysis states 12 cars will be able to internally queue on the lower Osborn DOPU/24 cars on the Osborne/MPA link Rd but at 6m per car as per the \*\*AS/NZS 2890.1:2004 standard, these figures should actually be *not 12 and 24 but 9 and 14*. This of course means that the extra cars queue not internally - but on Osborn Rd, impacting significantly on residents and the flow of traffic around the school.

Another problem with the projected queuing as more students are added is that the maths simply does not make sense. There is a linear relationship between more students and more traffic, yet the Applicant presents a massive deceleration in queuing with no explanation as to why this is. What is more worrying is that the DPIE have accepted this without question. Maybe they rely on the *magical GTP-effect* but Alex Giyahi from Greys addressed this point at the IPC Hearing – there is simply no data from industry that this effect is real v simply aspirational. In other words, traffic reports make a big thing of GTPs and whilst we would like to think they have an impact on traffic, the reality is that they simply don't. The whole traffic report presented by the Applicant can therefore be viewed as being built on somewhat of a house of cards...

\* secondly, as local resident Mark Westcott has argued at the IPC Hearing, the GTP is aspirational and has certainly not taken into account COVID (or actually the relative attractiveness of driving to school now that NorthConnex has taken some of the traffic off PHR). What if the GTP does not end up reducing the amount of car traffic that enters the school? The result will be queueing up and down Osborn Ave, MPA, Normanhurst Rd and probably even onto PHR. Noted that Member for Ku-ring-gai Alister Henskens SC MP has also questioned the aspirational nature of the GTP in several submissions he has made to the DPIE, including his last on to the IPC on Oct 1, 2021.

\* thirdly, selective drone footage provided by the Applicant's representatives indicates a current max queuing at 9 vehicles on Osborne Rd. Can this be relied on? The queuing number of 9 is consistent with the DOPU stats provided by the Ason group but I note a couple of things here:

[1] what about the teachers and students who drive to school? According to Loreto's figures, there are about 330 additional cars currently coming from these groups into Osborn Road each morning too. The analysis focuses on DOPU but that is not the only traffic. The

applicant conveniently forgets about these 330 cars but they are significant. 90% of teachers drive in each day and you have a sizable student population driving themselves in each day which is approximately equal to the DOPU numbers. And what about all of the residents that want to use the road as well? They will add to queuing but are ignored by the Applicant's stats.

[2] how reliable are the Traffic Assessment Report surveys that the Applicant relies on? What was asked? Who crunched the numbers? Is it appropriate to be relying on *Survey Monkey* figures that the applicant has presented and have we all really just assumed that the extrapolations from there are correct? How can an SSD of this size not have proper accurate and actual **quantitative** data and how can the government not demand it? The extrapolations from the Survey Monkey data are highly questionable. For example, the Applicant's surveys present a current DOPU with 1150 students having a queue of 9 during peak times on Osborn Rd. But a queue of 9 takes it back to PHR and then what about the extension of that queue down on Normanhurst Rd which then causes traffic mayhem for the parents and kids of Normanhurst Public School who then cause problems for Normanhurst Boys High School and it's easy to see that Loreto's problems then end up extending into Thornleigh's problems.

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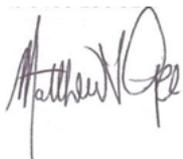
At the end of the day the IPC has to look at the development and ask themselves whether the Applicant has truly done their homework. Also, surely the IPC must contemplate whether this growth can be sustained given the site and the low-rise residential community that the school finds itself in.

I wonder whether the nuns 120-odd years ago, would have ever thought that their small boarding school of 20-30 students would one day aspire to have **2000 students** and **500 teachers** streaming in every day via just **two, single lane, dead-end, cul-de-sacs**.

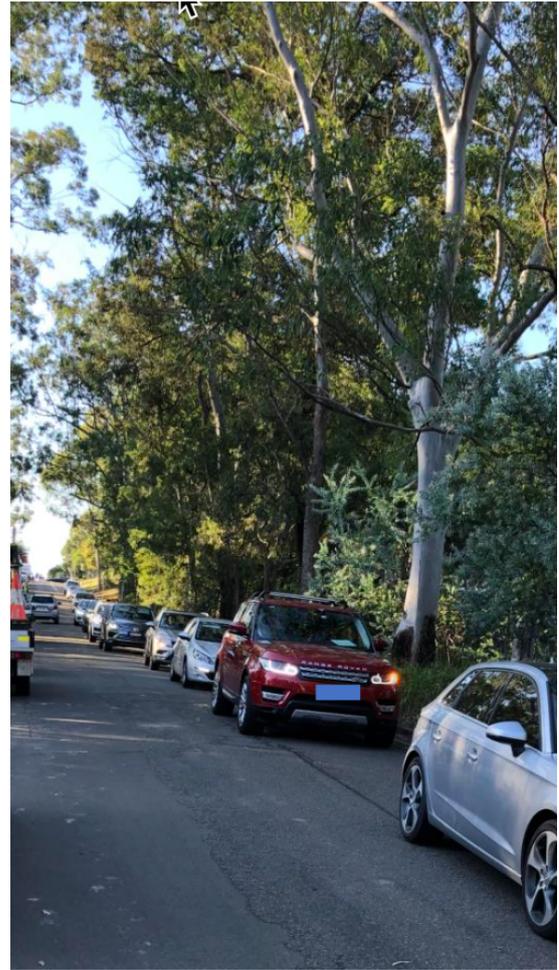
If peak hour is a nightmare now, what can the residents expect when this school practically doubles?

To my mind this is all quite simple: if Loreto want to expand, they should bear the economic costs of doing so and should ensure that the social costs are not shafted onto the residents – all for the sake of 'growth.'

Kind regards,



Matthew Gee  
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Traffic congestion during pick-up from turning off at traffic light on the intersection of PHR and Osborn Rd all the way into Loreto Normanhurst oval.



Traffic heading north along Mt Pleasant Ave waiting to turn into Pennant Hills Rd (traffic line was 500m long). How can residents break into this and how long will someone at the back of that line have to wait to get onto PHR? 30 minutes? (This happens at Unwin Rd and College Crescent at Barker College frequently and the same thing will happen here).



Convoys of buses don't belong on quiet cul-de-sacs. These should be entering off PHR (Loreto have their own entrance but someone in TfNSW has recommended it be closed!)

\* Australian Bureau of Statistics (May 2021) 2016 Census DataPacks[<https://datapacks.censusdata.abs.gov.au/datapacks/>], ABS Website, accessed 2016.

\*\*[https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as2000/2800/2890.1-2004\(+A1\).pdf](https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as2000/2800/2890.1-2004(+A1).pdf)