

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

## Loreto IPC speech

Please note, additional information in red

Good morning, everyone.

Thankyou for facilitating this meeting.

I live in Currawong Avenue, one of the feeder streets of **a giant cul-de sac** of which Osborn Road is the only exit.

I have **three points** I wish to make, and to comment on Loreto's Corporate Social responsibility and Social License to operate.

The **first** is the apparent glossing over and dismissing of Hornsby Shire Council's submission to **widen Osborn Road**. The submission was made on the 6th of July but could not be found on the DPIE portal. It was embedded in the IPC portal but that is not a place most residents would have looked, as anyone engaged with the development had been guided to the DPIE portal.

In the DPIE assessment the council recommendation was dismissed by Bitzios (**the consultant engaged by DPIE**) as "**too difficult**" but with no explanation as to what this difficulty is.

Clearly the council traffic engineers did not regard the widening as **too difficult**.

When I contacted the council, they were yet to receive a formal response to their submission and advised a traffic engineer would be addressing this IPC meeting, but perhaps their submission will be dealt with in a different forum.

**The widening of Osborn Road** with two lanes on the eastern school side all the way down to gate 3 would be **a good engineering solution** which has been proposed by the council who are **an authority** on the subject. As much as **I would like to protect the trees along the road** this seems to be a compromise that I believe most residents could come to terms with.

Most, if not all, residents have been denied the opportunity to comment on the proposal and have been **denied procedural fairness**.

**Secondly**, the re-located Drop Off and Pick Up areas allow for 36 vehicles in a road length of 139 metres. Simple maths shows this is only 3.86m/car. According to the Australian standard 2890 a minimum of 6m/car is needed for safe queuing. This is a **crucial** error in a consultant document and renders the recirculation "solution" impractical.

**Additional information:**

**6.2.28 Based on the proposed student population, short-term travel mode share targets and the typical pickup/drop-off usage (90 seconds) the updated TAR predicts during the peak periods,**

the school would generate demand for the following vehicle queuing on Osborn Road: • eight to nine vehicles queuing - 100 additional students. • 10 to 11 vehicles queuing - 150 additional students. • 13 to 14 vehicles queuing - 250 additional students. • 15 to 16 vehicles queuing - 500 additional students. **How can this progression possibly be correct?** It starts at an additional 2-3 additional vehicles per 50 additional students, 3-4 additional vehicles per additional 100 students and 2-3 additional vehicles per additional 250 students. **This is gobbledygook.** If you ratio up 15-16 vehicles for 500 students, then an additional 850 students would need 26-27 cars. **Completely implausible for an additional 850 students. And these numbers do not include the current school population of 1150 students.**

As per 6.2.29 To address existing traffic issues and to meet future demand due to student and staff increase, the Applicant's RtS proposed a new through site road, two pick-up/drop-off areas (five spaces) and **onsite queuing capacity for approximately 36 vehicles** (Figure 29). In addition, the Applicant advised that the existing four pick-up/drop-off spaces would be converted into two bus bays.

Figure 29 shows the link road allows only 3.5 m/car and the Osborn DOPU allows 4.55 m/car. The existing DOPU has 6.08m/car

As per AS 2890, 6.0m/car is what is required for safe queuing. The length of an average car is 4.5m, and many parents drive large 4WD and would need at least this.

If 6m is required, then the Osborn carpark length of 54.6m would only take 9 cars (not 12) and the link road length of 84.6m would only take 14 cars (not 23)

**Total 23 cars and not the 36 they have allowed for.**

The residents are owed an explanation as how any of the above makes sense. **And how the queuing and recirculation options can possibly work.**

**Thirdly**, the Green Travel Plan is an implausible, aspirational document and should not be relied upon for predicting future traffic flow **particularly** in an ongoing new Covid world and which relies purely on the goodwill of the parents and **cannot be enforced.**

**Note, in 6.2.7 of the DPIE assessment, it is acknowledged 30% students drive or are driven.**

This is 15.8% dropped off and 13.9% driven=29.7% rounded up to 30%

We are being asked to believe that a voluntary GTP will reduce this to 18.5% after stage 1 and to 13% by completion. This when student numbers have increased by 850 (74%) and Covid is the new normal where car travel will be king.

If for a moment we do believe the 13% of students arriving by car at completion that would still be 260 car movements

130 for each of Osborn and MPA And that is just students/parents **and not including staff movements where >250 staff are needed to run the school.**

**The Green Travel Plan is pure fantasy (unenforceable) invented to obfuscate a clearly unworkable re-circulation" solution.**

**Corporate social responsibility** is a company's commitment to manage the social, environmental, and economic effects of its operations responsibly **and in line with public expectations**. Loreto has shown **none**.

Neither has Loreto grasped the concept of **social license to operate**.

Social License exists when a project has the **ongoing approval** within the local community. It must be earned and then maintained. **Loreto has NO social license** to operate in our community.

Whilst it may not be the remit of the IPC to assess whether an applicant has displayed Corporate Social Responsibility and/or whether they have a social license to operate, the IPC most certainly should consider the degree of community unrest that will be unleashed if their concerns are not properly and fairly addressed.

There have been 80 Objections from residents and the Adventist aged care Home. Every one of these objections has been batted away by consultants engaged by Loreto to do just that. There is **not a single submission in favour** of the development.

The attached pdf shows the traffic chaos that can occur under current school size.



2020-09 - Photos -  
Loreto - Traffic chaos

The impact on parents of the Primary school on Normanhurst Road as well as parents travelling from the east to Normanhurst West Primary school and Normanhurst Boys Selective school has not been considered in any kind of holistic analysis. That impact would get considerably worse if the no right hand turn at Mount Pleasant Avenue is implemented and Loreto parents forced to exit left, move immediately to the right-hand lane (possibly dangerous) and then turn right (north) into Normanhurst Road before going round the roundabout and heading south up to PHR trying to make their way East again.

The new link road and relocated DOPU into the Osborn Road carpark at Gate 3 with recirculation options is not viable as the maths is incorrect-Refer my second point. DPIE have simply accepted Bitzios recommendation to proceed with the relocated DOPU areas saying this will solve everything. It will not, as it cannot work.

**I urge the IPC to consider the following:**

Understand that the community feels it has **NOT really** been listened to. And is very angry.

Understand that Loreto does **NOT** have a social license to operate and in current form is a very unwelcome neighbor.

Ask the DPIE to look again at the **Council recommendation to widen Osborn Road** which would be a **good engineering solution** that does not rely on an implausible and aspirational Green Travel Plan.

Ask the DPIE to go over the Bitzios and other consultant reports with an **impartial eye** on the **errors and deficiencies** pointed out by myself and other speakers

**Scale back the development** from 2000 students (an increase of 74% from the current 1150 students) and cap the number at say 1450 which is still a **very significant 26% increase**.

Advise Loreto to **completely reconsider the scale, scope, and impact on the community**.

**Please consider** that “Consultant Solutions” developed for paying clients need high level scrutiny, and it is clear that the work in a number of areas in these reports is of an unacceptable standard and in some cases plain wrong. If DPIE does not have the in-house expertise to impartially assess these reports then there should be a process in place to **engage a competent independent assessor**. Bitzios has clearly not applied sufficient scrutiny to Loreto consultant reports.

Thankyou.