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**RE: DA2019/1340 - 100 / 0 Meatworks Avenue OXFORD FALLS NSW 2100**

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This DA should be firmly rejected for the following reasons.

Northern Beaches Council has declared a Climate Emergency and committed not to lose any more bushland or threatened species habitat.

- The site is within the area of potential occurrence of Duffys Forest Endangered Ecological Community, and there are some indicator species in the flora list. However, there is no plot data or mention of any comparison made between what is on site and what constitutes Duffys Forest, particularly in relation to Smith and Smiths (2000) guide to this community. Given that the site is within the area that supports Duffys Forest, and the description of the soil type indicates it is lateritic, this should be addressed

- While the Powerful Owl, Grey-headed Flying-fox, Pygmy Possum and Redcrowned Toadlet were the subject of assessments, other species were not considered, which had recently been recorded in close proximity and would be expected to occur, given the vegetation descriptions. These species include: Giant Burrowing Frog, Barking Owl, Rosenberg's Goanna. Also there is no mention of the rare and precious Spotted-tailed quoll (*Dasyurus maculatus*) which has been documented in this location by experts.

The three key areas that are not addressed in this report and should be are:

- Impacts on local and regional wildlife corridors (construction and operation phase)
- Increased traffic movements on road kill, both in the immediate vicinity, and Wakehurst Parkway, an identified "hot spot" for road kill already (e.g SMEC (2011) , There is no mention of how much additional traffic in the local vicinity and region will occur and what impact that would have on road kill
- Cumulative impacts -The expansion of this area, which is incongruent with the bushland and surrounding land uses is likely to pave the way for further expansions

A very short distance away, (Lot 908 & 907) the two blocks uphill from the old 'Meatworks' have just been listed as an important 'Aboriginal Place' These contain Aboriginal carvings, a rock shelter and provision of required pigments from flora and clays which offer insights into aboriginal customs and tradition.

The application to increase the industrial units would not only imply an increase in overall activity but also an extension towards these blocks of land with a diminution of the separating

vegetation barrier. This would result in lesser noise absorption, much higher visual impact and also greater light pollution.

The Flora and Fauna report stated that.. "A full fauna survey following Threatened Species Survey and Assessment Guidelines (OEH 2013) was not undertaken in sufficient detail to determine the likelihood of occurrence of threatened and migratory species for the purpose of this report". This is not good enough.

The bushland to be totally cleared or thinned for the APZ contains healthy good quality bush which should not be negatively impacted or degraded..