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

To Northern Beaches Council DA Assessment Team,

I have examined the Development Application for DA2019/1340 - LOT 100, DP 1023183 50 MEATWORKS AVENUE OXFORD FALLS, particularly the flora and fauna assessment. I have the following comments on the 'Ecoplanning (2019). Flora and Fauna Assessment- Lot 100 // DP 1023183, Lots 1053 & 1054 // DP 752038 100 Meatworks Avenue, Oxford Falls. Prepared for Gelder Architects.'

The area to be cleared is approximately 0.1 ha and a further 0.29 ha will be impacted by thinning for an APZ around the new buildings. The report reflects this small area of clearance by being relatively brief and written by a junior member of Ecoplanning's team. In the report it states it has been assessed using Threatened Species Test of Significance Guidelines (OEH 2018), indicating it is minor and therefore is not required to be assessed (and offset) using the Biodiversity Assessment Method (BAM) under the Biodiversity Conservation Act 2017. While this is probably correct, there is no explanation/justification of this.

The report is a reasonable attempt at assessment for a minor development, and it is not my desire to nit pick other consultants work, so I focus just on key omissions that mean that the report doesn't paint a full picture of potential ecological impacts:-

- 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 at least be addressed
- The decision on which species of threatened entity from those recorded within 5 km to undertake further detailed assessment appears fairly arbitrary and based on how far away recent records are (Appendix A), best practice is to provide detail on habitat requirements (foraging and breeding) and distribution, and then provide justification against this as to if the species is likely to occur, taking into account the proximity of recent records. However, just because something has not been recorded in the vicinity recently, does not mean it isn't there, different areas receive different levels of survey and have different accessibility, which is just as much of an influence on the number, type and proximity of records.
- While my speciality is fauna, I note that the Black-eyed Susan *Tetratheca glandulosa* (a species I have surveyed for and found in the Duffys Forest area) is cryptic and very difficult to find, even by the most seasoned botanist when it is not flowering. Surveys were undertaken in March, well outside the flowering season. No mention of the difficulty of detecting threatened flora outside of their flowering times (for some species) was made.
- The dates and the ecologist surveying were provided, but no indication of survey effort was made, it is standard
- While the Powerful Owl, Grey-headed Flying-fox, Pygmy Possum and Red-crowned Toadlet

were the subject of further detailed 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. There is no indication within the report that the habitat found would rule these species out of at least a more detailed assessment.

- Some minor errors such as not referring to other Grey-headed Flying Fox camps that would have animals foraging in that area (ie. Burnt Bridge and Warriewood Wetlands camps)

While the above should be addressed and/or taken into consideration during the approval process, 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) , 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 - this is a big one for me, the expansion of this area, which is incongruent with the bushland and surrounding land uses is likely to pave the way for further expansions in that facility and in others. The current location was not a good idea when it was approved, due to bushfire risk, local resident amenity, ecology and traffic issues, but we should now limit that footprint to what it is and not allow further development there, or in the vicinity.

Thank you for your attention to my submission and I hope you will look further into the above matters during your assessment process.

Regards,

Elvira Lanham - Principal Ecologist with 24 years experience, including experience in the local area for this site. Also rate payer in Northern Beaches LGA, property owned in Frenchs Forest).

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