

05/05/20

DR Nicole Richardson
Lot 1109 Oxford Falls RD
Oxford Falls NSW 2100

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

Please note my objection to the above referenced planning application, as a mother of children at Oxford Falls Grammar School and as a resident of Oxford Falls. My objections are summarised as:

1. The development of a significant industrial facility is not in keeping with the stated council objective in the WLEP 2000: "the present character of the Oxford Falls Valley locality will remain unchanged". Specifically:

"The present character of the Oxford Falls Valley locality will remain unchanged...The natural landscape including landforms and vegetation will be protected and, where possible, enhanced. Buildings will be located and grouped in areas that will minimise disturbance of vegetation and landforms whether as a result of the buildings themselves or the associated works including access roads and services. Buildings which are designed to blend with the colours and textures of the natural landscape will be strongly encouraged."

2. The traffic survey is not statistically valid, the methodology and finding is flawed and misleading:

- a. A single day survey has been used (Tuesday 27th August 2019) on which to base the traffic report and cannot be considered statistically valid;
- b. The junction being assessed is not the key congestion point: Wakehurst Parkway / Dreadnought Road junction has been assessed, rather than the actual point of congestion at the Oxford Falls Road / Dreadnought Road junction;
- c. Even based on the flawed methodology above, the AVD statistics appear to indicate the outcome to be within 1.1% of an E rating (56.4 projected AVD, versus Category E range of 57 AVD (see table 1 & 2 below)). The method used is certainly not accurate to within 1.1%;
- d. Category E outcome is defined as "At capacity and requires other control mode";
- e. Even allowing for the flawed methodology, the explanation of 'vehicle movements' is fundamentally misleading given that the primary movements of concern will not be cars but industrial vehicles, creating significantly greater social, environmental and risk factors than implied by simple vehicle movements analysis;
- f. Added to this is the increased construction traffic impact and public safety risk, for some 2-3 years during construction;
- g. Based on the above, the statement from the planning consultant that, "the traffic generation of the proposed development will not present any adverse traffic implications and traffic-related environmental impacts" is clearly misleading;
- h. In the previous 2017 DA, the Council's Engineer Referral accurately assessed that, "any increase in number of trucks travelling on Dreadnought Road during the school's AM and PM peak hours "8am-9.30am and 2.30pm-4pm Monday to Friday" will have a significant adverse impact on the school and is not supported."
- i. And finally, all traffic assessments ignore the obvious, that the key issue with transportation in the vicinity is that of public safety and that access is required for buses, in addition to parent drop-offs, for the > 1000 school children, given that there is no public transport to the location.

3. The suitability of the development and the road usage is at odds with the location of Oxford Falls Grammar school for Kindy to Yr 12 students, within 400 meters of the proposed site:

- a. The existing walking paths, road crossing from Oxford Falls Road and Dreadnought Road are woefully inadequate and risk levels will be further increased;
- b. Specifically, there are no pathways on Oxford Falls Road and Dreadnought Road close to the school, and no pedestrian crossing across Dreadnought Road or Oxford Falls Road. There is a high risk of accident for children and parents walking to school along Oxford Falls Road, and for the parents and students who park along Dreadnought Road and Oxford Falls Road due to the limited parking on site and further along Oxford Falls Road, beyond the school;
- c. Existing speed limits of 50KMH on Oxford Falls Road and 40KMH on Dreadnought Road are largely ignored by commercial and private use vehicles. It should also be noted that there is not a continuous 40KMH school speed restriction for the key pedestrian areas around the school;

d. A sense check of expanding a commercial recycling premises into a full industrial facility, with 111 parking spaces, less than 400m from a school, would confirm the inappropriateness of the development application;
e. The school has plans for increasing its student intake, resulting in a greater number of buses, cars and pedestrians around the school. The inadequate, and at some points, non-existent pathways around the school cannot cope with increased pedestrians and increased traffic without a significant increased risk of accident;
f. Should the proposal go ahead, I would expect the Council and the developer underwrite the risk of accidents to property and people that will result from the approval.

In conclusion, I would strongly encourage Council reviewers to visit the site at any peak school period, try walking to the main school entrance from Oxford Falls Road and Dreadnought Road (including crossing Oxford Falls Road or Dreadnought Road); and the inappropriateness of the application will be painfully obvious, without the need for statistically valid surveys or assessments.

Sincerely,

Dr. Nicole Richardson

Table 1, source: DA2019/1340 - Report - Traffic and Parking

Table 2, source: DA2019/1340 - Report - Traffic and Parking