
Sent: 11/01/2020 1:21:16 PM
Subject: Online Submission

11/01/2020

MR PLANNING PARTNERSHIPS Pty Ltd
49 Willowtree CRES
BELROSE NSW
ben_rourke_planning@hotmail.com

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

RE DA2019/1340 - LOT 100, DP 102318350 MEATWORKS AVENUE OXFORD FALLS
Proposed Stage 2 light industrial development

Dear Sir / Madam,

As a parent of students at OFGS, and as a local town planning consultant I have the following concerns with the proposed light industrial development. In summary these are intensification of development and overdevelopment of the site, incompatibility with the local character for the Oxford Falls Locality and excessive traffic with regard to the local road network capacity.

1. EP&A Act 1979 - S.4.15(1)(a)(i) - Compatibility with zone - under WLEP 2000:
"The Desired Future Character Statement for the B2 Oxford Falls Valley Locality" specifies "low intensity, low impact uses" stipulated in for the locality. As a statutory zoning objective, Council must be satisfied that the proposal satisfies this land use and development objective.

The proposed intensification of development on the site is not considered of low impact due to increased traffic generation, and impacts of this on the local road network, as described further in this submission.

2. EP&A Act 1979 - S.4.15(1)(b) & (c) - Impacts - Intensification of use and suitability of the site:

The proposal seeks an additional 13 units + ancillary buildings / 4000m2 GFA beyond the Court approved Stage 1 development of 30 light industrial units. The increase in number of units is more than 40% and represents a significant intensification for an area identified under WLEP 2000 for low density development. This is considered unacceptable without an upper limit in industrial development density / GFA being established beyond the 'agreed' terms of the Court approval.

As a 'low intensity and low impact' development, as described in the SEE, its overall size and 4 storey character (including the approved Stage 1) resembles part of a larger industrial development such as the industrial suites at North Belrose or Warriewood, rather than a discrete standalone light industrial premises with limited, inconsequential traffic generation (such as a storage facility). Accordingly the Stage 2 development cannot reasonably be described as a "low intensity and low impact" development, with associated low level impacts to its surrounds, and the site is therefore considered unsuitable to support the proposed development.

3. EP&A Act 1979 - S.4.15(1)(b) - Impacts - Traffic impacts:

The Traffic Report by TTPA (ref. 19179 dated Oct. 2019) acknowledges the site is isolated with no public transport services, and as a consequence justifies a surplus of parking (111 spaces proposed whereas 77 required under Council's DCP).

Based on a traffic survey the Report advises a Level of Service D ('Operating near capacity') for the PM peak at the intersection of Dreadnought Road and Wakehurst Parkway, with a reported average delay of 56.4 seconds. This does not clarify the PM peak period (4pm - 5pm or 5pm - 6pm?), noting traffic from OFGS has a PM peak period of 3pm - 4pm school days.

From personal experience, traffic delays at this intersection (close to 4pm, school day under existing traffic conditions) can be up to 5 minutes (LOS E to F, requiring an intersection upgrade). Therefore the addition of the approved Stage 1 development and proposal would likely increase the PM peak traffic volume, and resultant intersection delays. Accordingly clarification is sought as to whether the PM peak traffic assessment was surveyed to include the 3pm - 4pm.

Furthermore the traffic assessment does not address the un-signalised intersection of Oxford Falls Road and Dreadnought Road, being the key intersection for access and egress for the site along with Oxford Falls Grammar School. Concern is raised that in addition to existing traffic at this intersection during the AM and PM peaks, additional traffic generation from the development (including Stage 1) will result in both increased delays turning south or west into Dreadnought Road, and increased risk to traffic safety at this intersection. Noting the school environment, pedestrian safety will also be at increased risk for those crossing the road at or in the vicinity of this intersection.

Conclusion

The proposed expansion to the approved industrial development is considered to result in an overdevelopment of an isolated site, which cannot reasonably satisfy the 'low intensity and low impact' character of the Oxford Falls locality. The development is likely to result in excessive traffic volumes that the local road network cannot accommodate without causing unreasonable traffic delays. Accordingly the proposal as submitted is considered unsatisfactory in response to the statutory assessment criterion as required under S.4.15 of the EP&A Act, and cannot be supported by Council.

Yours faithfully,
Ben Rourke (BTP, MEnvLaw, RPIA)
Planning Partnerships