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Subject: Online Submission

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

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

I have assessed the subject DA2019/1340 and oppose the proposed Stage 2 light industrial development on the following grounds.

EP&A Act 1979 - S.4.15(1)(a)(i) - Compatibility with zone - under WLEP 2000: "The Desired Future Character Statement for the B2 Zoned Oxford Falls Valley Locality" specifies "low intensity, low impact uses" stipulated for the locality. This does not meet the desired requirement. The ad for the current units states 'suitable for all types of businesses'. Oxford Falls is not zoned for 'all types of businesses under its B2 Zoning'. As a statutory zoning objective, Council must be satisfied that the proposal meets the prescribed land use and development objective. The proposed intensification of development on the site is not considered to be low impact given the inherent increase in traffic generation.

DA2019/1340 - Report - Construction Traffic Management and DA2019/1340 - Report - Traffic and Parking) are both flawed, in that the report does not address the impacts of the broader road network and the findings represent the bare minimum. The Oxford Falls Grammar School has a student population of 1200 pupils, with an additional 40 teachers and related staff. The school is serviced by 10 busses in the morning, leaving 40 staff and 620 pupils to arrive, predominantly, by vehicle, as the catchment does not cater for public transport or pedestrian movements.

Since the school doesn't encourage carpooling, it is reasonable to assume that with a minimum of 3% siblings or 36 pupils, up to 642 vehicles in the morning are travelling to the school, with the majority of these vehicles, returning after drop off. The road corridor of Oxford Falls Road and Meatworks Avenue is currently a dead-end. Therefore, the intersection of Oxford Falls Road and Dreadnought Road alone currently carries in excess of 1284 vehicles daily - this doesn't take into consideration the people travelling through to and from work, the people travelling to feed their horses in the morning and night or the residents of Oxford Falls Road. Neither does it take into consideration the tennis academy and its patrons.

The proposed development consisting of almost 50 industrial units, will all have a minimum of two people working at each one, that adds an extra possible 200 cars a day in an already congested area (up and down, each car counts as two as the road is one in and one out, there is no public transport so cars are a necessity), plus all their deliveries, extra employees and customers. That makes well over 1500 cars daily. Plus trucks and ancillary traffic.

Then there is a need to consider the C3 Church and St Pious sporting fields. The C3 Church

itself states that they have 'thousands of people attending their services', they too have only one road in and out, causing traffic congestion at the intersection of Dreadnought Road and Wakehurst Parkway and increased traffic along Oxford Falls Road from Iris Street. The church also have multipole weekday 'community groups' of which many people walk along Oxford Falls Road to attend.

Oxford Falls Road has no kerbs, no guttering and no provision for formed carriageways. It is a semi rural street which has many blind corners and is not wide enough to walk two abreast without walking in the actual street. Pedestrian safety is of concern, as is safety of other road users such as cyclists and horse riders. The majority of Oxford Falls Road is double yellow lines, the road is not as wide as other local streets and trucks often have to cross to the wrong side to simply navigate their way down. They often struggle to enter from Iris Street and as such cause regular traffic jams.

The intersection of Oxford Falls Road and Iris Street has not been assessed yet this is the main route used. I refer to the road maps on the submission... the construction route for trucks to travel to and from the building site: It is blue for trucks heading in and green for them heading out. There is a major flaw in this report in that Oxford Falls Road has a 3T limit. The exemption is lifted only for trucks travelling DOWN to Meatworks Ave, not up - therefore the report is incorrect and need to be reviewed.

DA2019/1340 - Report - Traffic and Parking The traffic report was conducted in the middle of the day. This is not sufficient and needs to be redressed to be conducted during school peak hour to assess fully the impact the school and work traffic has in the area. It needs to include the intersection of Iris Street and Oxford Falls Road, Oxford Falls Road and the Wakehurst Parkway, Oxford Falls Road and Dreadnought Road and Dreadnought Road and the Wakehurst Parkway - without these intersections monitored adequately this report is insufficient.

The report "DA2019/1340 - Report - Traffic and Parking " states that the projected vehicle generation of Stage 1 and Stage 2 developments during the peak traffic periods would be:-
Total vehicle movements IN in AM peak = 82 Total vehicle movements OUT in AM peak = 22
Total vehicle movements IN in PM peak = 46 Total vehicle movements OUT in PM out = 62.
These will be fighting with 10 school busses in the morning and 17 busses in the afternoons along with the previously mentioned over 600 parents and teachers vehicles, plus the numerous vehicles travelling to and from work who use Oxford Falls as a rat run which already account for over 1500 vehicle movements per day.

Furthermore, DA2017/0739 - Traffic Engineer Referral Response, which is Northern Beaches Council's Traffic Engineer Referral Response to the previous DA for this site. In this report, the Officer states "The site is located in close proximity of the Oxford Falls Grammar School and 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."

Bushfire hazard: "The site has bushfire prone land surrounding it' and 'The proposed new building and the site is required to respond and implement an appropriate level of bushfire protection measures' - this report is cursory at best. It does not address the instance of a bush fire (most recent out of control one was in 2017). There are no plans for evacuation nor consideration of evacuation along with the 1200 students plus teachers and related staff at Oxford Falls Grammar School. This needs to be redressed and assessed fully for the safety of all concerned.

The study area is identified as Lot 100 // DP 1023183 and Lots 1053 and 1054 // DP 752038 (100 Meatworks Avenue, Oxford Falls, NSW (Figure 1.1) States "It is situated in The Northern Beaches Local Government Area (LGA) and is zoned under Warringah Local Environmental Plan 2011 (WLEP) as "Deferred Matter". The subject site comprises 0.68 hectares (ha) of land mostly consisting of cleared land, existing infrastructure and native vegetation in a range of condition classes. The study area is situated to the north east of the suburb of Frenchs Forest and is situated to the east of the Wakehurst Parkway and to the north east of Oxford Falls Grammar School. No watercourses have been mapped within the study area". Yet there is a creek which runs right beside the proposed site and flows down into Narrabeen Lagoon.

It also states "However, a definitive list of the flora within the study area cannot be gathered without systematic traverses and survey across a number of seasons. Based on the likelihood of occurrence (Appendix A) and incorporating the field based habitat assessments, six threatened fauna species have been identified as having a 'high' or 'moderate' potential to use the study area. Additionally, two threatened microbat species were recently recorded within the study area. The following threatened fauna species may be affected by the proposed works: Additional species would be recorded during a longer survey over various seasons."

Perhaps if a through survey was conducted you would find that there are in the area many endangered and native species, such as the: • *Cercartetus nanus* (Eastern Pygmy-possum) (high), • *Pseudophyrne australis* (Red-crowned Toadlet) (moderate), • *Miniopterus australis* (Little Bent-winged Bat) (recent record), • *Miniopterus orianae oceanensis* (Large Bent-winged Bat) (recent record), • *Ninox strenua* (Powerful Owl) (recent recorded), and • *Pteropus poliocephalus* (Grey-headed Flying-fox) (high) **Varanus varius* (lace monitor) (high), red tailed cockatoo (*Calyptorhynchus lathami*) (high), Yellow tailed black cockatoo (*Calyptorhynchus funereus*) (high), Echidna (high), Swamp wallaby (*Wallabia bicolor*) (high), Lyrebird (*Menura novaehollandiae*) (high), Eastern brown snake (*Pseudonaja textilis*) (high), Green tree snake (*Dendrelaphis punctulatus*) (high), diamond python (*Morelia spilota*) (high), Native quail (*Coturnix ypsilophora*) (high), Quolls (*Dasyurus maculatus*) (high). Waratah (*Telopea*) (high), native orchids (*aladenia*) (very high), golden wattle (*Acacia pycnantha*) (very high). Amongst many others. These are all regularly sighted close, if not adjacent to the proposed sight.

Twenty three mature trees will be removed. The replacement species have little to no value in terms of biodiversity and are not native, Oxford Falls is a vital green buffer between Manly Dam and Garigal/Kuringai national Park. The lack of native habitat is of concern and will potentially increase road kill. There has already been a sharp increase in this on Oxford Falls Road as more native animals become displaced, The development of the hospital and the expansion of Manly Vale Primary School has seen an increase in native animals seeking new homes in the Oxford Falls area.

In conclusion, this proposal has no place nor demand in the Oxford Falls area. There are already two function centres operating in Oxford Falls and many more locally, as well as many vacant industrial factories available in neighbouring suburbs.

This is clearly a development that will purely be financially viable to one private party and is not for the overall good of the community.

Based on this and the assessments above the council must reject this development.