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

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I wish to lodge an objection to DA2019/1340 for the proposed development at Lot 100 Meatworks Avenue, Oxford Falls Road, Oxford Falls 2100.

I object in my capacity as a homeowner and ratepayer within the Northern Beaches Council area and a local resident well (within the 5Km radius noted in the various DA reports). Our home backs on to a bush corridor which links up with Red Hill Reserve and Oxford Falls bushland. Native wildlife such as goannas, black cockatoos and wallabies can be seen in this native bushland on a daily basis. This includes vulnerable and endangered native animals and birds (some of which have not been referenced in the Flora and Fauna Assessment submitted for this DA).

I object on the grounds of:

- major threats to the local native wildlife.
 - increased traffic congestion as a direct result of this proposed development
- I provide my comments in relation to the following DA2019/1340 reports which I believe are seriously flawed: -

- Statement of Environmental Effects -Boston Blyth Fleming (Nov 2019)
- Flora and Fauna Assessment -Ecoplanning (2019)
- Arboricultural Impact Assessment Report - Urban Arbor Pty Ltd -Ref 19/10/31/100MAOF
- Construction Traffic Management Plan - ttpa - Ref 19179 (Oct 2019)
- Assessment of Traffic and Parking Implications - ttpa - Ref 19179 (Oct 2019)

A Bushland Background

The proposed Industrial Building complex is surrounded by the Oxford Falls natural bushland and adjoining Red Hill Reserve. As noted in the DA documents:

"It is located at the southern extent of the Oxford Falls Regional Crown Reserve, on the eastern slopes of Middle Creek valley, approximately 5 kilometres upstream from Narrabeen Lagoon and 5 kilometres inland from the New South Wales coastline (Statement of Environmental Effects)".

I believe the proposed expansion of an existing isolated site in a semi-rural area such as this is inappropriate, excessive and will harm the local native wildlife and their habitat. It will bring more traffic, more noise and loss of native bushland, including mature trees (designated for removal in this submission). This proposed industrial facility clearly fails to satisfy the 'low intensity and low impact' character of the Oxford Falls locality and 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
The natural landscape including landforms and vegetation will be protected"

Wildlife protection areas are set apart for the protection of our native animals and their habitats and as noted on the Northern Beaches Council website:

"These bushland areas have been identified to support populations of vulnerable native wildlife, such as possums, birds and lizards ...and provide bush corridors for native plants and

animals

"Our diverse bushland is home to hundreds of unique native animal species such as fairy wrens, honeyeaters, tree frogs, sugar gliders, water dragons, skinks and owls. A number of these species are threatened with extinction and need our help to ensure their future survival. Red Hill reserve is a part of a regional wildlife corridor containing core habitat for local native fauna including swamp wallabies, Eastern Pygmy Possum, long-nose bandicoots and ring tail possums. This reserve provides an important stepping stone for many native animals moving through the wildlife corridor between Golden Grove Reserve and Garigal National Park."

Statement of Environmental Effects - Lot 100, DP 1023183: Objections & questions

1. According to this report, "This application seeks an expansion of the approved light industrial/ warehouse development... to meet a clear demand for this form of development in this location".

Question

What evidence is there for this statement other than the developer's personal interest and why this location specifically? Who else is demanding this development? Certainly not local residents, or the voiceless wildlife!

2. According to this report, "This application would facilitate the rehabilitation of disturbed perimeter bushland and would provide for substantial betterment in terms of environmental outcomes."

Question

Please explain how the Landscape Plans & Planting Schedule submitted with this DA, improve the environmental outcomes asserted, given the report states that only 50% of the site area is to be kept as natural bushland and acknowledges "...some additional vegetation and landform impacts will arise as a consequence of the works proposed."

3. According to this report, "The accompanying Flora and Fauna Assessment confirm the proposed works will not have a significant impact on any threatened species and that an SIS or BDAR is not required under the BC Act. Additionally, no referral to the DotEE is required."

Question

How is this statement valid when 6 threatened fauna species were identified in the same report as having "a 'high' or 'moderate' potential to use the study area and two threatened microbat species were recently recorded within the study area"?

DA2019/1340 - Flora and Fauna Assessment -Ecoplanning (2019) Objections & questions

Question

What exactly were the process, duration, and extent of the cited fauna survey?

Two dates are mentioned, however the only information provided in the survey is the weather plus a precis of very limited literature reviews.

According to the NSW Department of Planning, Industry and Environment, a field survey for DAs on sites which may contain threatened species such as this report must include:

- Details of the survey methods used, including number of traps and transects
- the number of repetitions
- weather conditions at the time of surveys
- names and experience of all personnel involved in the field surveys
- justification if this differs from the recommendations in these guidelines

This report also appears to minimise the potential loss of fauna habitat on the basis that the of healthy Scribbly Gum woodland designated for clearing, was not observed to be hollow-bearing.

Objection

Hollows of a medium-size suitable for animals such as parrots (this area is home to several native and endangered birds) take up to 200 years to form. Larger and deeper hollows (needed by Glossy Black Cockatoos and owls) take even longer.

I believe local native and threatened wildlife which I and other local residents see in this bushland area will be directly affected by the proposed works. These include (but not

mentioned in this report):

Black cockatoos - All native birds, reptiles, amphibians and mammals Protected in NSW

Echidna - Conservation status in NSW: Protected

Goannas and Monitors- Conservation status in NSW: "Threats to Australian monitors include habitat loss due to land clearing and habitat degradation for urban development Protected

Southern Boobook (Mopoke)- "Most owl species rely heavily on old-growth trees with hollows for breeding.. ... land clearing is wiping out these trees at an alarming rate."

Southern Brown Bandicoots - "Northern Beaches is home to them, however the population has been reduced to a critical level. This is primarily attributed to loss of habitat for urban development, "

The North Head bandicoot -" considered to be geographically restricted, predominantly due to urban development."

Swamp wallaby - "...wallaby are now listed as threatened in NSW."

Parrots, Yellow-tailed Black Cockatoo & Red-tailed Black-Cockatoo - " nest in tree hollows. the large hollow-bearing trees are becoming scarce as more and more land is cleared"

Of particular concern is the fact that this report minimises or makes no mention of:

- potential impacts on local wildlife corridors
- Increased roadkill due to increased traffic in the immediate area, Oxford Falls Rd and the Wakehurst Parkway
- Noise disturbance, dust, vibration and general disruption of this bushland area
- • Cumulative impacts due to expansion of this area which is incongruent with the bushland

Although this report concludes:

"No threatened species listed under the EPBC Act or BC Act were recorded within the study area."

It also includes the caveat,

Nevertheless, it is possible that the subject site could be used by threatened native fauna for foraging purposes, particularly those assessed as having a 'moderate' and 'high' likelihood of occurring in the study area."

Arboricultural Impact Assessment Report Ref 19/10/31/100MAOF - Urban Arbor Pty Ltd

According the Northern Beaches Council website, their bushland reserves and wildlife corridors are Wildlife Protection Areas ensuring habitat for local native fauna including swamp wallabies, long-nose bandicoots and ring tail possums. They have Plans of Management and provide:

" an important stepping stone for many native animals moving through the wildlife corridor to Red Hill Reserve and Garigal National Park.

"Council is committed to the protection of trees and bushland on the Northern Beaches

"Our bushland is vital habitat for native animals from the threatened pygmy possums and powerful owls, to the common swamp wallaby and ring tail possum.

"These reserves are home to an array of native flora and fauna often providing the last remaining refuges for threatened species.

" all trees at the site are subject to protection under the Warringah Local Environmental Plan (LEP) 20115 and Warringah Development Control Plan (DCP) 2011.6"

Questions

1. Is the fact that 25 trees are recommended for removal to accommodate this development, including eleven 'higher retention value' trees (category A & AA) of no consequence?
2. How can the economic ambition of a developer take precedence over the need to retain trees and vegetation and prevent further displacement and decline of wildlife?

Assessment of Traffic & Parking Implications Transport and Traffic Planning Associates Ref: 19179

Construction Traffic Management Report - ttpa - Ref 19179 (Oct 2019)

I found these reports to be very selective in their scope, cursory in detail and biased towards the developer. I believe the current proposal would have a significant adverse impact on the

surrounding local road network (including Iris Street) and object to this development on the basis of traffic & safety issues and specifically in relation to the following points:

1. The 'road network' as described in this report, totally omits the double intersections of Brooker Ave & Iris St and Oxford Falls Rd and Iris St.

This is clearly a major omission that needs to be addressed - there are -2 entry points to Oxford Falls Rd and the development site -not just the one included in this report!

Exiting Brooker Ave onto Iris Street by car is already fraught with danger in both the mornings and afternoons due to increased traffic flow associated with the Northern Beaches Hospital plus heavy traffic backed up Oxford Falls Rd (sometimes as far back as Oxford Falls Grammar School) also trying to enter Iris Street.

Crossing Iris St as a pedestrian at these times is even more perilous as there is no pedestrian crossing or lights to safeguard school children and local residents attempting to cross the street to access the public bus stop.

2. This report states: "The operational performance of intersection (sic) of Wakehurst Parkway/Dreadnought Road has been assessed and the results indicate satisfactory performances..."

This is totally incorrect! As a regular driver, I frequently face long traffic holdups trying to access the Wakehurst parkway from Dreadnought Rd in a northerly direction - both in the mornings and afternoons. Vehicle queues often extend beyond the tennis academy already! With additional construction vehicle and increased traffic loads if this development goes ahead, traffic queues will be significantly worse.

I question the movement data provided in the appendices as they appear quite unrelated to reality. The information provided is very unclear - no lane diagrams, table definitions or legends are provided. It appears from Appendix C that there are 3 lanes in Dreadnought Rd but there are only 2!

Traffic conditions cannot be assessed with any validity on one single day of the year. Most traffic professionals would insist on 5 consecutive days. As it turns out, 27 August 2019 was a Tuesday and totally unrepresentative of peak traffic loads as St Pius X College, on the opposite side of this intersection (never mentioned in this report) create significantly more traffic on their Wednesday, Friday, and Saturday sports days.

I also have serious questions about the modeling used in this report given that it appears to be based on RTA guide circa 2002.

3. Why is no consideration given to the safety of pedestrians, bicycles and horse riders on Oxford Falls Rd in this report?

Pedestrians (frequently school children) are already at serious risk on this narrow road with no designated pedestrian pavement. Regular car drivers already need to slow down and move over when faced with large trucks, pedestrians, bicycles and local horses. This road will become increasingly hazardous to pedestrian, cyclists & horses (this is zoned as semirural) with increased vehicle numbers & size.

In closing, I believe the developer and various report writers have a responsibility to provide answers to the questions. I am also hopeful that the Northern Beaches Council will act in a manner that supports their espoused position on the protection of local bushland and our vulnerable native flora and fauna. The safety and protection of local residents and school children should also be paramount.

Thank you

Desley Vorobieff