

26 February 2026

Ms Teresa Gizzi
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Our Ref: 2026/101783

Ms Teresa Gizzi,

Council Comments - SSD-73688210 - Queenwood School Sporting Facilities - 1100 Oxford Falls Road, Oxford Falls.

Thank you for your correspondence inviting Northern Beaches Council's advice on the Environmental Impact Statement for Queenwood School Sporting Facilities - 1100 Oxford Falls Road, Oxford Falls.

Detailed comments are provided under Appendix 1 for Development Assessment, Traffic, Heritage, Development Engineering, Urban Design, Landscape, Environmental Health, Riparian Lands, Aboriginal Heritage, Flooding, and Biodiversity.

This letter forms an objection to the proposed development in that various issues have been raised under each of the above categories in the appendix.

The appendix also provides general advice which may be used to assist in the formation of consent conditions, were the proposal to be approved.

Should you require any further information or assistance in this matter, please contact Thomas Prosser, Principal Planner on 8495 6499.

Yours faithfully



James Farrington
Director Planning & Place Division

Appendix 1 Northern Beaches Council Submission - Detailed Supplementary Comments - SSD-73688210 - Queenwood School Sporting Facilities - 1100 Oxford Falls Road, Oxford Falls

1. Development Assessment

The site is in the 'B2 Oxford Falls Locality under Warringah LEP 2000. The following section of the desired future character statement provides a context for the character of the area:

The present character of the Oxford Falls Valley locality will remain unchanged except in circumstances specifically addressed as follows.

Future development will be limited to new detached style housing conforming with the housing density standards set out below and low intensity, low impact uses. There will be no new development on ridgetops or in places that will disrupt the skyline when viewed from Narrabeen Lagoon and the Wakehurst Parkway.

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.

Concern is raised about the significant visual impact of the proposal, and lack of integration with the natural landscape. The setbacks to each public frontage do not provide opportunity for a reasonable landscaped buffer to enable the structure to appropriately integrated within the natural form and character of the area. The proposal does not include the required 20m front setback with dense landscaping. What is proposed is a 10m setback to the indoor courts and the setback to be occupied by a driveway/drop off zone and parking.

The height being in the vicinity of a storey above the requirement under the LEP (8.5m) also contributes to this visual impact.

As such, concern is raised that the proposal is inconsistent with Warringah LEP 2000, with a presentation of built form that is inappropriate for the established and desired character of the area.

2. Traffic

Parking

The Warringah DCP and the Transport for NSW Guide to Transport Impact Assessment specifies the rate of parking required for this type of development. To inform the assessment of the need, a bespoke demand analysis has been undertaken by the Transport Consultant for the applicant, which indicates a capacity usage of 140 attendees at anyone time.

Whilst this is acceptable based on the proposed usage, normal operation of a sporting facility of this type would have a period between scheduled events where the number of attendees doubles as patrons from one game leave and the next game arrive. There is no mention of how this will be managed in any of the documentation provided.

The provision of 82 spaces is acceptable and additional parking capacity is potentially available within the adjoining road reserves, subject to the applicant undertaking some upgrade works to support the proposed development.

Traffic Generation

The Transport Impact Assessment report indicates the development will create an additional 68 vehicle trips in the peak hours. It is unsure how many concurrent events will be held on any given day and the impact of this when combined with the traffic generated by Oxford Falls Grammar School and the St Pius X College facility nearby when all 3 facilities are in full use.

It is noted in the Transport impact Assessment report that the trips will be spread across 3 directions to reduce the impact on any specific route. Given the facility is a private school campus this is to be expected as there is a diverse catchment for students.

The increase in bus traffic is a concern with the route to access the site likely to bring buses from the south along Oxford Falls Road from Ellis Road Beacon Hill. This will need to be further addressed by the applicant to reduce the impact on residents in peak traffic and usage periods. Further to this matter, the applicant should consider the construction of a roundabout at the intersection of Wearden Road and Oxford Falls Road to facilitate bus turn around and to act as an entry treatment to the expanded Education Precinct.

Loading/Servicing

All site servicing should be wholly contained within the subject site with all service vehicles entering and exiting in a forward direction. The site access points should cater for the largest vehicle expected to service that part of the site, noting the size of the vacuum truck required to service the septic system.

Circulation

The basement carpark circulation meets the requirements of the Australian Standard 2890.1 in terms of aisle width, parking space dimensions, and ramp grades. The plans show a boundary boom gate for primary access control along with a motorised sliding gate to control access to the basement carpark. These devices need to be actively managed in periods of peak traffic generation so as not to affect through traffic on the public road network. Currently it appears there is only sufficient space for one vehicle to queue at the boundary boom gate, which is not suitable access to the site.

Sight Lines

The applicant should ensure that sight lines are maintained within the carpark to ensure pedestrian safety. The line of sight at the entry and exit driveway should be maintained free from visual obstructions, including landscaping at both the pedestrian conflict point and at the kerb.

Works Required in the Public Domain

As part of the development the proponent should undertake the following works to support the use of the proposed development.

- Kerb and gutter construction and half road reconstruction for the full site frontage in Dreadnought Road to provide a 3.2 metre travel lane and a 2.1 metre parking lane.
- Kerb and gutter construction and half road reconstruction for the full site frontage in Oxford Falls Road to provide a 3.2 metre travel lane and a 2.1 metre parking lane, with the exception of the area between the proposed driveways which is to be further indented to facilitate the provision of the bus bay to cater for 3 buses.
- Construction of the Roundabout at the intersection of Wearden Road and Oxford Falls Road to facilitate safe access for buses attending the site.
- Construction of a 2.5-metre-wide pedestrian footpath along the site frontage between the southern boundary of the site to a point approximately 40 metres along Dreadnought Road and then continue along the boundary as a 1.5-metre-wide footpath to the western boundary of the site.
- Construction of a raised shared user crossing in Dreadnought Road to connect the site to the route bus stops on Wakehurst Parkway north of Dreadnought Road intersection.

Public Transport Access

Council supports the introduction of the Green Travel Plan for the site, with a key component of the concept is the access to the route bus stop on Wakehurst Parkway so people attending the site can utilise the 155 Bus service to access the site.

General advice

The Construction Traffic Management Plan (CTMP) submitted is not endorsed. If the application is approved and consent granted the applicant must apply to Council for a CTMP approval after engaging with the Transport Team at Northern Beaches Council to provide guidance on suitable travel routes and construction staging.

Any new of changes to existing parking restrictions required to facilitate the proposed development will need to be submitted to Council at least 8 weeks prior to the proposed implementation to allow the matter to be considered by the Northern Beaches Council Local Transport Forum.

3. Heritage

The subject site is not listed as a heritage item under the Warringah Local Environmental Plan 2000, being the relevant LEP for the site. However, it is located within the vicinity of a heritage item listed under the Warringah Local Environmental Plan 2011. This is the former *Oxford Falls Public School* which is listed as Item I116. It

is located within the Oxford Falls Peace Park located to the west of the subject site on Lots 1 and 2 DP 853151. The heritage item is set within landscape gardens and benefits from an extended vegetated curtilage that extends along Dreadnought Road through the front of the subject site, as well over the common boundary of the access handle for Lot 33 Dreadnought Road into the subject site. This extended vegetated curtilage is an important part of the setting of the item and provides an important visual break from surrounding development.

Council's heritage review of the Arboricultural Impact Assessment notes extensive vegetation removal is proposed. This includes along the Dreadnought Road frontage (T35 through T52 as well as T194 and T195) and along the western boundary of the site (T54 through T75). This includes numerous trees identified as being of high retention value with significant canopy as well local endemic species. In addition significant benching of the site in close proximity to the western boundary is proposed with a high retaining wall. Replacement plantings along the western boundary are proposed as Lily Pilly. The proposed landscaping outcome to the western boundary is insufficient and should be supplemented by native endemic vegetation capable of providing a better replacement outcome for the existing significant vegetation. This should be species capable of growing to a minimum height 10m to off set the removal of the existing screening vegetation. In addition, more screening vegetation and canopy trees are required for the Dreadnought Road frontage of the site as replacement for the removal of the existing screening vegetation.

The HIS assessed the subject site and found no items on the site as being of significance. It also notes an Inter-War building known as the pool house'. A full photographic archival recording of this building and its setting should be undertaken and provided to Council for historical archival purposes.

4. Development Engineering

On site stormwater detention is not required for this development as the property is subject to flooding which has been identified in a previous adopted Council Flood Study. Council's Water Management for Development Policy excludes flood affected lots from on-site stormwater detention requirements.

Stormwater Drainage and Road Upgrade Works Required within the Council Road Reserve

As part of the development the proponent should undertake the stormwater drainage upgrade and road upgrade works in Oxford Falls Road and Dreadnought Road. Details for road upgrade works are contained under Section 2 Traffic.

The applicant proposes stormwater drainage upgrade works in Oxford Falls Road for the frontage of the site as detailed in the stormwater management plan prepared by WSCE Consulting Engineers. These works include the provision of a stormwater drainage line with the Oxford Falls Road frontage to capture the upstream overland and piped flows. The system has been designed for a 5/100 AEP storm event. However as required by ARR(Australian Rainfall and Runoff) section 4.2 Climate change is to be factored into the calculated stormwater flows.

The alignment of the proposed stormwater drainage line in Oxford Falls Road needs to be relocated as required by the travel and parking lane widths detailed above.

Additionally, any headwalls that are to either discharge to proposed swales or the existing creek system are to incorporate scour protection best practice principles.

The design of the stormwater and road upgrade works are to be in accordance with Council's Auspec One Design specification document.

Also, any stormwater and road upgrade works required within Dreadnought or Oxford Falls Road will require a separate Section 138 and 139 Road Act approval by the Road Authority.

5. Landscape

- Outdoor sportsfield
 - Recommend taller locally native canopy tree planting, such as *Angophora costata* along the frontage to Dreadnought Road. Tree planting indicated is relatively sparse and low-medium height. Local native landscape character should be enhanced along the public interface via the use of locally native tree shrub and groundcovers. This will assist protect and enhancing the natural landscape and integrating the 'hard' elements of the proposal (walls, fences and sportsfield lighting poles)
 - Tree planting in the Dreadnought Road road reserve should also be considered to extend the native landscape character beyond the limited width garden area.
 - Western and Southern boundaries of the sportsfield are indicated to be planted with Lilly Pillys as a hedge. Whilst a wider planting area would be preferable to accommodate a more varied natural mix of species, the narrow garden bed indicated in the design (approximately 1.5m wide) could accommodate the Lilly Pillys indicated. However, see Heritage comments regarding landscaping adjoining the Heritage items.
- Indoor Sports Hall
 - The entrance to the Sports Hall is dominated by hard elements. The bulk of the proposed buffer planting is located within the Oxford Falls Road road reserve on the edge of the property rather than within the subject property. Preference should be given to a greater setback to the building to provide a better landscape buffer to the public interface of the proposal.
 - Trees in the south eastern corner of the property on Oxford Falls Road are indicated for removal to accommodate the substation. It would be preferable to find an alternate location for the sub-station to enable retention of these trees.
- Open Landscape Areas including the Riparian Zone and North East corner.
 - These open landscape areas are important for improving the overall natural landscape character of the property. Treatment of these areas should aim to re-create the natural landscape structure. As such, local native tree, shrub

and ground cover species should be used exclusively, all weeds species removed and planting densities as dense as possible in consultation with the bushfire consultant. Landscape Plans should be certified as compliant to bushfire requirements by the bushfire consultant.

- All Tree Protection Plans and Tree Protection Specifications should be in accordance with AS4970-2025 Protection of trees on development sites.

6. Environmental Health

- The Detailed Site Investigation provided identifies further investigation is to be undertaken in the former boat storage area to determine the extent of the potential contamination associated with this activity.
- In addition, the area in the vicinity of the creek line, that being the creek and the embankments to the east and west, within the proposed Riparian Zone, could not be fully accessed, therefore there is a potential for buried fill and/or other potential environmental concerns in this area.
- Both these areas need to be investigated further and the DSI amended to include this additional testing. Should the additional soil investigation indicate other areas of concern and the requirement for further remediation, an addendum or revision to this RAP will be required to amend the remediation strategy.

7. Riparian Lands

- The tributary of Middle Creek that flows through the site is a NSW mapped hydro line watercourse and is regulated by the Water Management Act 2000 (WM Act). The NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) administers the WM Act and is required to assess the impact of any proposed controlled activity to ensure that no more than minimal harm will be done to waterfront land because of carrying out the controlled activity. DCCEEW recommends a Vegetated Riparian Zone (VRZ) width based on watercourse order as classified under the Strahler stream ordering system. This tributary is considered a 3rd order stream and is required to have a VRZ of 30 metres on each side of the watercourse.
- Council has also mapped this watercourse as a 3rd order stream and requires a 30 metres VRZ. The Warringah LEP 2000 for the deferred lands states 'Development is to be sited and designed to maintain and enhance natural watercourses and aquatic habitat.' If development is sited within 40 metres of a watercourse, a controlled activity approval is required from the NSW Government.
- The proposed development only establishes a 10 metre wide Vegetated Riparian Zone (VRZ). The outdoor sports field and indoor sports hall have been located outside of this 10 metre zone, however the VRZ should be 30 metres.
- In accordance with the DCCEEW guidelines for riparian corridors, non-riparian corridor works such as recreational areas, can be authorised within the outer riparian corridor, so long as the average width of the vegetated riparian zone can

be achieved over the length of the watercourse within the development site. However, an equivalent area connected to the riparian corridor must be offset on the site and the inner 50% of the vegetated riparian zone must be fully protected and vegetated with native endemic riparian plant species e.g. the inner 15 metres of the VRZ.

- The site is not connected to the sewer and so a modified on-site septic system is proposed. Note this is not for on-site treatment. It is proposed to be emptied on an ongoing basis by a vacuum truck. In the landscape design the septic system is positioned close to the creek and next to a swale flowing to the watercourse and this should not be located within the VRZ.
- A Synthetic turf sports field is proposed. Microplastic pollution, chemical leachates, and reduced soil health are listed as potential impacts. Other concerns listed in the Report provided are pollutants, heat impacts, and end of life disposal. All raise concerns for the creek – pollutants, warm water runoff, synthetic grass decay should be addressed. Note that heat impacts are somewhat mitigated because the proposed surface does not include rubber, which is a significant driver of heat.
- The Rehabilitation Plan could not access the creek line to assess for soil contamination such as buried fill and/or other potential environmental concerns in this area. Future works should cater for the possible need to rehabilitate creek line, particularly for construction of the swale and stormwater outlet connection to the creek.
- The proposal includes a stormwater outlet and a swale, both of which connect to the creek. Proper scour protection is required in the design to prevent damage to the creek. This will likely require work on the bed or banks of watercourse, which is a controlled activity. At this stage the proposal does not appear to include creek reconfiguration but if this changes then it would raise additional concerns. Any connections are to be constructed as per relevant DCCEEW guidelines.
- The inclusion of piers in the bridge design is not known at this time. Any piers should be located outside of the creek channel area.
- The landscape drawings include a boundary fence at the upper and lower limits of the property. It should be made clear that, should these capture debris during high flow events, maintenance will be the responsibility of the school.
- It is recommended a Waterway Impact Statement be prepared to address development within the VRZ as per Councils 'Protection of Waterways and Riparian Land Policy'. A Waterway Impact Statement should demonstrate the development will either enhance, or as a minimum, will not adversely affect ecological function or limit opportunities to reinstate the area in the future to the greatest possible extent. The Waterway Impact Statement should demonstrate through an attached engineer's report the proposed development is not at risk from damage from creek bank erosion. The Statement should address why the VRZ is not 30 metres and discuss any offsetting of the VRZ as per DCCEEW guidelines for riparian corridors.

8. Aboriginal Heritage

The Aboriginal Heritage Office recommends a preliminary inspection ('due diligence' under the *National Parks and Wildlife Act 1974*) by a qualified Aboriginal heritage professional. The assessment would provide information on what potential Aboriginal heritage issues exist on the land and recommendations for any further action if required.

A Due Diligence Aboriginal heritage assessment should be completed for the subject area to confirm if Aboriginal objects are located or area likely to be located within the subject area. Under the National Parks and Wildlife Act 1974 (NPW Act) all Aboriginal objects are protected.

9. Flooding

Floor level requirements are generally satisfied. However, the final design should ensure there is at least one step up from the ground level to the hall on its eastern side, so that overland flow does not enter directly into the hall. For Vulnerable uses such as schools, floor levels for the building and entry points for the basement car park are required to be at or above the PMF level or FPL, whichever is higher. Despite the fact that the report does not address freeboard in the overland flow flooding area (whereas Council does apply freeboard for overland flow flooding, generally reduced to 0.3m for 1% AEP flood depths less than 0.3m), it appears from Figures 18 and 20 that the floor levels would be above the FPL if freeboard had been applied. It should be noted that the FPL and PMF levels are quite close to each other on the eastern side of the hall, and that climate change has not been considered in the determination of the floor level. (The NSW Government's Flood Risk Management Manual requires consideration of climate change, and Council's draft DCP which is expected to go on public exhibition in 2026 would require inclusion of climate change scenario SSP3 plus freeboard. The report has estimated this would add about 0.2m to the 1% AEP level).

The pedestrian bridge across the creek is high enough. The deck varies from 77.2 to 79.0 m AHD and is above the PMF level of about 76.2m AHD and well above the 1% AEP level of about 74.4m AHD. The inclusion of piers is unknown at this stage, but design of the bridge and piers needs to take into account the forces of floodwater, debris impact, blockage and buoyancy.

Emergency response is addressed in the Preliminary FERP and FIRA and is satisfactory. It recommends shelter in place as road access to the site is flooded during a PMF event, with high hazard flooding on Dreadnought Road. Floor levels for the hall and bridge are above the PMF level, and the hall's floor space of 2900m² has more than 1m² for the maximum occupancy of 250 people. A PMF flood event is expected to last a matter of minutes or at worst, several hours. If evacuation was attempted (say for a medical emergency), flow on Oxford Falls Road and across the sports courts is only low hazard overland flow in the PMF.

There are some adverse impacts, and impact mapping has not been provided for the PMF event, only for the 1% AEP event (Figure 23). The DCP defines impacts as adverse if there is an increase of more than 0.02m in the 1% AEP event or more than 0.05m in the PMF event. In the 1% AEP event, there would be impacts of up to 0.1m on the near side of Oxford Falls Rd, but not on private property. In the PMF event, it appears from the depth contours on Figures 10 and 20 that there would be an increase of more than 0.05m on Oxford Falls Grammar School downstream of Dreadnought Rd. The fact that the property downstream is a school which also requires planning for the PMF event makes the requirement for no adverse impacts in the PMF event even more important. The impact mapping for the PMF event needs to be provided, and if impacts on Oxford Falls Grammar School are more than 0.05m in the PMF, they need to be addressed.

The final design should ensure there is at least one step up from the ground level to the hall on its eastern side, so that overland flow does not enter directly into the hall. The entry to the basement car park is above the PMF level, but it should also be ensured that any other entry points such as stairs and ventilation areas are also above the PMF level.

The pedestrian bridge design needs to take into account the forces of floodwater, debris impact, blockage and buoyancy.

The impact mapping for the PMF event needs to be provided, and if it shows that flood levels at Oxford Falls Grammar School would be increased by more than 0.05m in the PMF, the design needs to be amended, e.g. by reducing the constriction on the flow area.

10. Biodiversity

- The Biodiversity Development Assessment Report (BDAR) (AEP, January 2026) identifies two Plant Community Types (PCTs) on the subject site:
 - PCT 3595 – Sydney Coastal Sandstone Gully Forest
 - PCT 3176 – Sydney Enriched Sandstone Moist Forest

It is recommended the landscape plan be updated to include additional areas of locally native vegetation to ensure biodiversity values are retained following removal of existing vegetation.

- The BDAR indicates that trees with hollows will need to be removed. It is recommended that the impact mitigation measures better address these removals and include remedial measures to retain habitat or compensate for the removal of these hollows.
- It is acknowledged that a Landscaping planting schedule has been submitted and includes only native species. However, it is recommended that 100% of species planted to replace trees and vegetation removed should consist of species belonging to PCT 3595. This will allow to Avoid and Minimise impacts to the natural environment in line with the requirements of the EP&A Act as well as the NSW Biodiversity Conservation Act 2016 and could be included in the impact mitigation

measures in Table 22 – Summary of proposed mitigation and management measure for residual impacts.

- Mitigation measures presented within Table 22 of the BDAR generally relate to impacts or potential impacts during works. Amendments are recommended to assist in addressing ongoing impacts:
 - 10 hollow-bearing trees are proposed to be removed (Table 13: Hollow-bearing Tree Assessment). The hollows should be either retained in vegetated areas of the site and replaced with appropriate nest boxes that will provide habitat during works and after completion of works.
 - The recommendations relevant to biodiversity included in Appendix C (Mitigation measures) should be incorporated into Table 22 of the BDAR to ensure that these measures are conditioned and actioned at the right stage of the development.
 - It is recommended that permanent delineation of Asset Protection Zones is included in Table 22 of the submitted BDAR as part of the impact mitigation measures.