
Sent: 17/11/2020 5:12:10 PM
Subject: Local Planning Panel
Attachments: DA2020-0552 - Bushfire comments 20201117.doc;

Dear Carly

Attached is a submission from Save Manly Dam Catchment Committee.

Please forward to the Panel.

Thank you.

--

Ann Sharp
T: (02) 9938 3459
M: 0414 383 459

To: Northern Beaches Local Planning Panel
DA2020/0552
181 Allambie Road, Allambie Heights

17 November 2020

Dear Panel

We strongly support the Council recommendation for refusal of the development proposal.

Following is a brief extract of our concerns about bushfire risk and the ongoing impact it is likely to have on natural areas within the catchments of Curl Curl Creek and Manly Dam.

Re BUSHFIRE RISK

ASSET PROTECTION ZONE (APZ)

Environmental impacts relate to:

1. Land use conflict
2. Climate change and bush fire risk
3. Riparian land and creek corridor
4. Clearing and fragmentation

LAND USE CONFLICT

The proposal will result in irreconcilable land use conflict:

The bushland in and contiguous with the Park will continue to be the main threat of bushfire for this new development. Conversely, this development will be a ongoing threat to the integrity of the surrounding bushland areas.

CLIMATE CHANGE

The increased risk of bushfire is likely to result in increased setbacks for asset protection in future years. If so, further encroachment of the Park would be required under the Rural Fires Act to clear more bushland as a result of this NEW development. This scenario is not compatible with the protection of heritage conservation values within the Park.

RIPARIAN LAND

The APZ would overlap riparian land within the site and adjoining reserve. The Protection of Waterways and Riparian Lands Policy, and DCP2011, state that asset protection zones should be avoided on riparian land.

The Council approval for the APZ overlap would be combined with the APZ encompassing the creek corridor immediately adjoining the Park. The removal of vegetation adjoining the watercourse upstream will exacerbate the impact of the APZ in the Park.

CLEARING & FRAGMENTATION

The proposed Inner Protection Area (IPA) will involve the removal of wide swathes of native and disturbed vegetation and will severely fragment bushland areas contiguous with the Park.

The clearance of large portions of the bushland area for the purpose of Inner and Outer Protection Areas will have a significant negative impact on natural areas within Curl Curl Creek catchment.

BUSHFIRE RISK

The bushfire prone land is not suitable for seniors housing.

Bushfire risk associated with dry weather, high temperature and hot winds is predicted to increase in the future due to climate change.

As a consequence, setback requirements for asset protection are likely to become more onerous. Even then, the APZ requirements will only reduce bushfire risk, they will not eliminate or prevent bushfire in vulnerable locations.

The Manly Dam Reserve is acknowledged as the main bushfire risk to this development.

Under the EP&A Act the likely increased risk of bushfire associated with climate change is an additional reason to warrant refusal of the development. The Precautionary Principle needs to be applied in this instance.

If Council agrees to the APZ in the Park it is also taking on board:

1. Any future obligation under the Rural Fires Act to provide an increased APZ subject to more onerous requirements due to climate change.
2. Increased pressure on Council to undertake hazard reduction within nearby areas of the Park to reduce the actual and perceived risk to residents and property in the new development.
3. The potential liability if the new development, in close proximity to bushland, is exposed to ember attack or smoke that affects property assets or the health of residents.

We urge the Panel to refuse the development application.

From Save Manly Dam Catchment Committee

Email: savemanlydamcc@gmail.com