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**Sent:** 20/07/2020 3:07:17 PM  
**Subject:** Online Submission

20/07/2020

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**RE: DA2020/0552 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100**

Dear M/s Haidari,

I wish to strongly object to this application on the following grounds.

#### BUSH FIRE

1. the application document, Bush Fire Management Plan, that accompanies this application entirely relies on and references throughout a superseded Planning for Bushfire Protection 2006 (now replaced by PBFP November 2019, the operative document. The application continually refers to the 2006 document and fails to measure proposed bush fire management against the recently adopted 2019 criteria.

This is an important distinction because the 2019 RFS document contains significantly different elements in relation to Special Fire Protection Purposes, the relevant document with which to measure the ability of the development to comply with current Best Practice.

I therefore believe, on this ground the application should be rejected.

2. PFBP 2019 specifically "discourages" placement of a SFPP project within a Bush Fire Zone. The Bush Fire Management Plan accompanying the application is contrary to that important criteria and therefore should be recommended by NBC for refusal.

3. The Bush Fire Management Plan accompanying the application claims to have existing use rights to utilise AZP on the Manly War Memorial Parkland, adjacent. This is uncertain and may have to be resolved at law. This claim purports to impose the cost of manual clearing and hazard reduction in perpetuity upon the relevant adjoining land holders, i.e. NBC and also Sydney Water.

While Sydney Water might as a consequence of development approval, perhaps make some agreement along these lines, the acceptance of such an encumbrance on NBC would, at its least, require due consideration and resolution of the elected council and then only after a fair process of public consultation and opportunity for input.

If the proper process resulted in a refusal by NBC to provide guarantee

to maintain this part of the APZ, in perpetuity, this application be Non-Compliant. Alternatively it is unreasonable in my opinion to so burden Northern Beaches Council. I therefore submit that determination of this application could not and should not be proceeded with unless and until this salient point is resolved.

4. The Bush Fire Management Plan document claims that " hazard reduction and manual clearing is regularly carried out by MWMMP", however there is no detail to support that claim nor the supposed frequency of these critical elements. In any event why should the cost-beleagured MWMMP be so encumbered as to provide enhanced maintenance to give the Bush Fire Management Plan credibility... and in perpetuity, at that.

David James OAM