
Sent: 1/04/2021 8:00:56 AM
Subject: Submission against REV2021-0006 from SMDCC
Attachments: REV2021-0006 Subm - SMDCC 20200331.pdf;

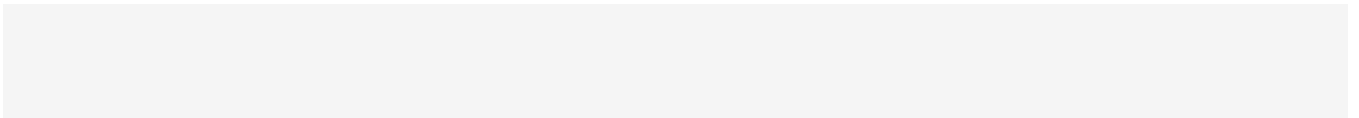
Please find attached submission from Save Manly Dam Catchment Committee objecting to the Review (REV2021-0006) of 181 Allambie Road, Allambie Heights.

Regards,
Ann Sharp

per Save Manly Dam Catchment Committee



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Review No: 2021/0006 - Seniors Housing
Address: 181 Allambie Road, Allambie Heights
31 March 2021

Save Manly Dam Catchment Committee Submission

We wish to strongly object to the proposal for a seniors housing complex comprising 24 independent living apartments, communal building, car parking and associated infrastructure.

This is our 3rd submission against this development on Crown Land adjoining the Manly Warringah War Memorial State Park. This Review follows the Northern Beaches Council and the Local Planning Panel rejecting Development Applications in both 2018 and 2020. This proposal shows no changes to the 2020 proposal and maintains the unacceptable impacts, both direct and indirect, of the construction and operational phases, and therefore we strongly object.

Our Objections include (but are not limited to) the following:

COMMUNAL BUILDING:

In the current proposal the communal building has been located further east to reduce the impact on bushland to the west. However, the building and APZ are still located on riparian land and the APZ extends into the adjoining Manly Warringah War Memorial State Park.

BUSHFIRE PRONE LAND:

The proposed development is on Bush Fire Prone Land.

“The Rural Fires Act (Planning for Bush Fire Protection) specifically discourages locating Special Purpose Developments within bush fire prone land.”

For Special Fire Protection Purpose Developments (seniors housing):

APZ: “Where ember protection is not feasible, then setbacks greater than 100 metres from bushland should be adopted.” (Planning for Bushfire Protection 2006)

The building setback would be only 50 metres from Vegetation Category 1 bush fire hazard to the west. (Bushfire report)

ASSET PROTECTION ZONE (APZ)

- A large area of bushland would need to be managed as an Inner or Outer Protection Area.
- The APZ would require the removal of vegetation and modification of bushland areas.
- The APZ will impact on bushland that is contiguous with existing bushland in MWWMSF.

BUSHLAND

The development would impact on the habitat of native fauna, including threatened species.

The subject site is surrounded by significant bushland vegetation to the west and south-west. Adjoining bushland to the west and south-west is contiguous with the Manly Warringah War Memorial Park (MWWMP).

“The primary direct impact of the proposal is the removal of vegetation and habitat including disturbed and intact native vegetation.” (Biodiversity)

“A total of twenty-five (25) vertebrate fauna species were recorded during the current field survey including five (5) threatened fauna species.” (SEE)

“The FFA determined that there was one threatened species *Cercartetus nanus* (the Eastern Pygmy Possum) listed on Schedule 1 of the Biodiversity Conservation Act found on site.”

HERITAGE CONSERVATION AREA

“The site is adjacent to land identified as Heritage Conservation Area (HCA) C9 being Manly Dam and surrounds.” (SEE)

LOSS of TREES

“Of the existing 107 trees within the relatively cleared area of the site, 85 are proposed to be removed.” (SEE)

RIPARIAN LAND

“The majority of area proposed for development is mapped as Waterways and Riparian Lands (Warringah DCP 2011) which is based on the Riparian Buffer around Curl Curl Creek (Warringah Creek Management Study (WCMS 2004).”

A large part of the development would be located on land identified as a riparian buffer within Curl Curl Creek.

The development site is located at the headwaters of Curl Curl Creek, which flows through Manly Warringah War Memorial State Park to Manly Dam.

A first order tributary creek traverses the site and diverts runoff via a small excavated channel that flows into the natural creekline immediately below the site.

Definition: “Creek means any watercourse, whether ephemeral, intermittent or perennial, whether on its natural course or altered by human interference, whether channelled or not.” (WCMS 2004)

The development would impact on the natural waterway downstream in Manly Warringah War Memorial Park that supports riparian vegetation and aquatic habitat.

The siting of the proposed development is contrary to the objective in WDCP2011 “E8 Waterways and Riparian Lands: “Encourage development to be located outside

waterways and riparian land”.

CATCHMENT SENSITIVITY

“Curl Curl Creek is classified as a Group A creek meaning it has very high ecological value and less than 10% connected impervious area (WCMS 2004).”

“Generally, Group A creeks can sustain very little further development before their aquatic ecosystems will change substantially, especially when they are close to natural condition and minor perturbations can have a major impact (WCMS 2004).”

HYDROLOGY

The extensive excavation would intercept subsurface flow and result in irreversible changes to the natural hydrology of the site.

This would occur during construction and ongoing during operation.

TOPOGRAPHY

The excavation for building, car parking and underground services would remove sandstone substratum and alter the natural topography of the site.

EROSIVE SOILS

“The geotechnical issues associated with this soil type include very high soil erosion hazard, rock outcrop, seasonally perched water table, shallow, highly permeable soil, very low soil fertility.” (Geo)

TRANSITION AREA

The existing landscape area provides a transition between the bushland and existing buildings.

STORMWATER

The increase in impervious surfaces and urban pollutants are a risk to downstream areas in the Park. The proposed stormwater and mitigation measures would not be adequate to protect aquatic habitat.

POTENTIAL IMPACTS

“Potential impacts of the proposed development include:

- Increased erosion and sedimentation, especially during the construction phase;
- Increased stormwater runoff during the operational phase due to an increase in impermeable surfaces;
- Modification Loss of habitat and connectivity due to the removal of vegetation;
- Decrease in water quality and increase in nutrient loads;
- Potential contamination of natural areas downstream including Manly Dam Reserve...”

PLANNING CONTROLS

The development does not satisfy compatibility criteria and requirements in SEPP (Housing for Seniors or People with a Disability) 2004.

The proposed development is not compatible with the surrounding land uses, in particular, Manly Warringah War Memorial State Park.

The development does not satisfy planning controls and requirements in Warringah LEP 2011 Warringah DCP 2011. The development is not compatible with the protection of bushland and riparian land within Curl Curl Creek catchment.

HEIGHT LIMIT

The proposal has a maximum height of 8.65 metres, which exceeds the maximum 8 metre height limit in SEPP (HSPD) Clause 40(4)(a) by 0.65m.

CROWN LAND

The development would be located on Crown land that was reserved for public and semi-public use.

SUITABILITY of the SITE

The subject site is an environmentally sensitive area that is not suitable for the proposed seniors living development.

PUBLIC INTEREST

It is in the public interest that the natural features of the subject site are protected.

STRATEGIC ISSUES

Manly Warringah War Memorial Park has high conservation values associated with its bushland and waterways. An overlay of environmental protection is required for natural areas within Manly Dam Catchment. This applies particularly to land adjoining Manly Warringah War Memorial Park. The proposed development is not compatible with the heritage conservation values of the adjoining reserve.

Ann Sharp
On behalf of SMDCC