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**Sent:** 30/10/2018 5:17:32 PM  
**Subject:** Online Submission

30/10/2018

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**RE: DA2018/1667 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100**

I have serious concerns about this DA and object to it on the following grounds:-

The community has been striving for many years to conserve the Manly Dam Catchment and sensitive bushland surrounds. Why haven't these areas of remnant Crown land adjoining the park not been afforded suitable E2 zoning and conservation status ?

"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)." (SEE)

"Connectivity: The site is upstream of an important tributary of Curl Curl Creek that flows into Manly Reservoir and there is continuous connectivity of bushland from the site to Manly Dam Reserve (i.e. Manly Warringah War Memorial Park)."

"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))."

"The central creekline is mapped as forming part of the upper headwaters of Curl Curl Creek within the Manly Creek sub-catchment (WCMS 2004). Council has determined the beginning of Curl Curl Creek on site to be the culvert below the existing road."

"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)."

"A large part of the site has been mapped as riparian lands by Council. Part E 8 Waterways and Riparian Lands. Part E 8 lands prescriptively must not have Asset Protection Zones located on them." (Bushfire report)

"The construction phase of the proposed development will require excavation works including cutting into the existing bedrock / slope. The impact of these works will be detailed in the hydrological engineer's report including alterations to flow rates, the impact of impermeable surfaces, and mitigation measures such as detention tanks."

"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;
- Increase in peak stormwater flows, and;
- Increased stormwater runoff being directed into Council's drainage systems."

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

There were 5 threatened species recorded on the site. Other recent constructions (such as Manly Vale School) have already caused substantial harm to the biodiversity of the War Memorial Park.

Other detention basins for stormwater control ( such as that at nearby Madison Way) have interrupted natural water flows, been a contributing factor of invasive weeds and caused great harm to the catchment. The report says that the "Existing detention basin will be upgraded with council permission." The existing detention basin is in MWWMP and should not be required to be upgraded for the purpose of increased development.

The viability of Manly Dam as the last Sydney location where you can safely swim in freshwater has been at tipping point for years (there is a propeller near the dam wall that has to oxygenate the water to prevent blue green algae). If further development like this is approved, the water quality will further deteriorate.

Surely the Council should be asking the Minister not to approve such an intrusive development on Crown Land.