20/07/2020 5:59:02 PM Sent:

Development application No: 2020/0552 Address: 181 Allambie Road, Subject:

Allambie Heights Development

Attachments: sub july NBC seniors Allambie.pdf;

Dear Councillors

Please find attached an objection letter regarding the proposed development 2020/0052 from STEP Inc.

your sincerely

Jill Green President 0408 470 043

https://aus01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.step.org.au% 2F&data=01%7C01%7Ccouncil%40northernbeaches.nsw.gov.au% 7C38c5ef37c1c846a9e9f508d82c829e5a%7C8c5136cbd646431c84ae9b550347bc83% 7C0&sdata=Oj4BJdzX3Ocw8%2BTx6rBSN1FKAiXU2E4COsUZZaSc46A%3D&reserved=0 secretary@step.org.au



20 July 2020

Northern Beaches Council

Email: council@northernbeaches.nsw.gov.au

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

STEP Inc is a local community-based environmental group, with a membership of over 400 in the northern Sydney area. Our main objective is to preserve natural bushland in northern Sydney from alienation or degradation and ensuring proper management of this bushland. Our group has considerable experience in environmental issues and regenerating and preserving natural bushland and native vegetation. We are also members of the Powerful Owl Coalition, a group of community organisations concerned about the future of the Powerful Owl population in Sydney.

STEP objects to the extension of Allambie Heights Village / William Charlton Village. The extension will involve the clearing of bushland that is on Crown Land. that was reserved for public and semi-public use. Some of the reasons for our objections are listed below.

- 1. The land is not zoned for the intended use as medium density development and is inconsistent with the provisions of the Local environment Plan. If this development is allowed how many such developments will be allowed using this as a precedent?
- 2. The proposed development is on Bush Fire Prone Land, which is not suitable for seniors housing. The Rural Fires Act (Planning for Bush Fire Protection 2006) specifically discourages locating Special Fire Purpose Developments within bush fire prone land. The development will require an Asset Protection Zone or Outer Protection Area thereby alienating even more bushland than the actual development footprint.
- 3. Eight threatened fauna species were observed using the site as a foraging area during the current and previous on-site surveys which confirms the rich biodiversity of this area. The area is also a potential breeding site for these threatened species.
- 4. To try and compensate for the impact of threatened species the D.A outlines the intention of purchasing Bio-banking credits. This acknowledges that they realise there will be a loss, however this system is significantly flawed. The credits cannot make up for the loss that will occur on this particular site.
- 5. The development will have major impacts on the Manly Warringah War Memorial Park, its bushland and waterways. There will loss of connectivity that has already been severely compromised by the major road construction around the Warringah Hospital.

- 6. There is no mention in any of the reports of the presence of the Climbing Galaxias fish (or any aquatic fauna) in the waterway that this proposed development will drain into. This is habitat for the only population of this fish in Sydney (reported to have existed in just one or two small creeks here for 60,000 years!
- 7. The development site is located at the headwaters of Curl Curl Creek, which flows through Manly Warringah War Memorial Park to Manly Reservoir. The development would be located on land identified as a riparian buffer within the Curl Curl Creek catchment. The development will create additional stormwater flows that will lead to additional nutrients that will lead to weed intrusion and erosion in the Park.

Yours faithfully,

Juil Green

Jill Green President