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

I have concerns about this development for the following reasons.

- a. The development site is located at the headwaters of Curl Curl Creek, which flows through Manly Warringah War Memorial Park to Manly Dam. "Curl Curl Creek is classified as a Group A creek- meaning it has very high ecological value.
- b. The development would be located on Crown land that was reserved for public and semi-public use. The Rural Fires Act (Planning for Bush Fire Protection) specifically discourages locating Special Purpose Developments within bush fire prone land.
- c. The required fire break (Asset Protection Zone) would mean the removal and modification of bushland in and adjoining the park.
- d. A total of twenty-five (25) vertebrate fauna species were recorded during the environmental field survey including five threatened fauna species."
- e. Of the existing 107 trees within the relatively cleared area of the site, 85 are proposed to be removed.
- f. Bushland and riparian buffer areas in Manly Dam Catchment should be zoned E2 for conservation not R2 (residential).
- g. The development would impact on the headwaters of Curl Curl Creek-the main feeder creek to Manly Dam and of "very high ecological value". This is the only habitat in Sydney of the ancient Climbing Galaxias Fish (see below link).

http://members.iinet.net.au/~kenhiggs/manlydam/Environment/Galaxias/galaxias_fish.html

- h. Increase in stormwater erosion and urban pollutants would put at risk downstream areas (as happened at Manly Vale School)
- i. Manly Warringah War Memorial State park is currently being nominated for National Heritage listing. The proposed development is not compatible with the high conservation values of the adjoining reserve.
- j. The leasee of the land is the Benevolent Society which has charitable status to provide low rental accomodation to underprivileged seniors. This application includes "luxury" appartments.
- k. Manly Warringah War Memorial Park was gazetted as a State park in April 2017. The intent was to provide better conservation status.

The entirety of the park is a living war memorial. All negative impacts degrade the war memorial.