
From: DYPXCPWEB@northernbeaches.nsw.gov.au
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Subject: TRIMMED: Online Submission

30/07/2024

MR Evan Turner
- 6 Joseph ST
Avalon Beach NSW 2107
[REDACTED]

RE: DA2024/0849 - 231 - 233 McCarrs Creek Road CHURCH POINT NSW 2105

Dear Mr England,

Thankyou for your consideration of the submission contained herein regarding the Development Application lodged for 231-233 McCarrs Creek Road, Church Point (DA2024/0849).

I implore NBC to strongly reject the application in question, and to likewise reject any substantially similar applications lodged for this address in the future. If allowed to proceed this development would set a deleterious precedent.

A blind bandicoot could see that the proposed development is absolutely inappropriate for an almost undisturbed bush block. As obvious as this may be, it doesn't preclude the proponent from lodging such an application. Unfortunately, it doesn't give council a solid basis for rejecting the application either.

However, I have read the attached reports and identified numerous issues, ranging from inconsistencies in information between different reports, to significant factual inaccuracies. I have detailed some of these below.

Issues with Statement of Environmental Effects (SEE) -

The issues contained within the FFA, AIA and Landscape Plans, which I will discuss shortly, could be described generously as disappointing. But the key issue with the SEE is that, by virtue of its astounding lack of detail, appallingly minimal effort to understand the locality, and plainly false claims, it makes a mockery of council and the community more broadly.

By way of contrast, there was a development application lodged today for the construction of a new boundary fence at a property in Avalon Beach, with the cost of works cited on the application as \$5,500 - well less than 1% of the cost of works cited on this application. Yet the SEE for the fence construction DA (which requests no DCP variations) is more extensive and detailed than the one submitted alongside this application.

I take deep issue with the statement in the SEE that "providing an adequately sized residential dwelling on the uniquely shaped allotment has resulted in the landscaped area

falling short of minimum requirements". There are thousands of other properties across the area that the Pittwater DCP applies which are smaller allotments and do not all fall short of landscaped area requirements. The intent of the landscaped area requirements in the DCP are of particular relevance for this and similar sites.

There are many other parts of the SEE which seem confusing or even sarcastic when read within the context of this application. However, I trust that this will be observed by council, and will now move on to some other issues.

Issues with Flora and Fauna Assessment (FFA) -

FFA - Likelihood of occurrence of Endangered Population excluded on erroneous basis:
The Endangered Population of 'Koala in Pittwater LGA' is excluded from consideration due to its "large home range". The Koala population in the Pittwater Local Government Area is listed as endangered, meaning it is a small and localised population facing high risk of extinction. Therefore the exclusion of this Endangered Population of Koala from further assessment is erroneous and means that part of the FFA is essentially missing.

FFA - Habitat Requirements of Southern Brown Bandicoot:
The report asserts that there are "no suitable rocks" on the site for Southern Brown Bandicoots to use as shelter. However, there is no evidence to support the claim that Southern Brown Bandicoots use rocks for shelter. Their typical shelter is a shallow depression in the ground covered by leaf litter and other plant material. This irrelevant assertion should be rectified and the 5-part test redone before council accepts the FFA for consideration.

FFA - Site Disturbance Unclear:
The report contradicts itself regarding the levels of historical ecological disturbance. On page 23 it states that "There is very little disturbance history on the site. It is made up mostly of native vegetation" - suggesting a relatively intact ecosystem. However, on page 44, it the report concludes that "The proposal will remove less than 750sqm of highly disturbed native vegetation." This contradiction raises questions about surveying, the veracity of other facts claimed in the report and, ultimately, the potential ecological impacts of the proposed development.

FFA - Indirect Impacts of Development:
The report briefly mentions potential indirect impacts, such as the impact of the new dwelling's proximity to retained trees, but fails to substantially assess these impacts. Indirect impacts, like changes in microclimate, edge effects, and altered hydrology can significantly affect the remaining vegetation and fauna. A more comprehensive evaluation of these impacts is essential to understanding the proposal's full ecological consequences.

FFA - Flora species missing from list:
The flora list for the site is incomplete, as evident from Google Maps' street view. Two prominent examples are the absence of *Eucalyptus botryoides* and *Livistona australis*, which are easily identifiable species. Their omission from the flora list raises concerns about the thoroughness and accuracy of the ecological survey conducted for the report.

Landscape Plans -

Although it is humorously claimed in the SEE that "replacement planting will occur following construction in order to maintain the ecological value of the land", this is clearly not borne out in the Landscaping Plans.

The choice of species does not reflect the Plant Community Type which occurs on the site, with only a single species listed in the plans being recorded in the FFA's flora list. This, and the aforementioned commentary in the SEE, demonstrate a lack of appreciation of the site's unique amenity and ecology. There are also no replacement plantings for trees listed in the plants schedule, contrary to what is stated in the SEE. Poor landscaping choices on a site like this would have significant ecological consequences beyond the obvious and immediate ecological damage proposed in the application.

Arboricultural Impact Assessment (AIA) -

It is highly unlikely that *Eucalyptus microcorys* (Tallowwood) or *Eucalyptus piluris* (Blackbutt) occur on the site, as claimed in the report. There are no records of either species occurring in the Northern Beaches LGA or Ku-ring-gai Chase NP on the type of soils found at this site (Narrabeen group), nor were either species reported to be present in the aforementioned FFA.

The trees in reference are probably from somewhat similar looking species that occur nearby, such as *Eucalyptus botrioides* (Bangalay), *Eucalyptus resinifera* (Small-fruited Red Mahogany), *Eucalyptus umbra* (White Mahogany), *Eucalyptus piperita* (Peppermint) or *Corymbia gummifera* (Red Bloodwood). Correct identification of these trees is absolutely crucial as arboricultural decisions are guided by knowledge of different species' size, structure, etc. - and some have been assessed for removal. If even one tree has been incorrectly identified, I do not believe the council should accept the AIA for consideration.

Furthermore, it is erroneously claimed in the report that *Eucalyptus robusta* occurs on the site (it has been incorrectly dubbed as 'Bangalay' - i.e. *Eucalyptus botryoides* - a species which does likely occur on the site).

The development application for 231-233 McCarrs Creek Road, Church Point (DA2024/0849) is riddled with inconsistencies and inaccuracies. The submitted SEE, FFA, AIA, and Landscape Plans are substandard, failing to meet the basic requirements for a proposal of this scale and potential ecological impact. These shortcomings collectively render the application unfit for approval. I strongly urge the Northern Beaches Council to reject this application and any future proposals that do not adequately address the environmental concerns raised herein. It is imperative that the council uphold its commitment to preserving the unique ecological value of the area and prevent the establishment of a harmful precedent.

Thank you for your time and consideration,

Evan Turner-Schiller