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20/07/2020

MS Emily Fewster  
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**RE: DA2020/0552 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100**

Dear Assessing Officer,

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

I strongly object to DA 2020/0552 181 ALLAMBIE RD for the reasons outlined below:-

Overall, despite a few modifications made to this revised version of the development application this development will have a seriously negative impact on the irreplaceable bushland and waterways of the adjoining Manly Warringah War Memorial State Park (Manly Dam).

Issues to consider include:

1. Extending a seniors housing development into bushfire prone land is crazy and reckless given we will have increasing bushfire risk into the future.
2. Using crown land for this development is against the idea of land being for public and semi-public use and this parcel of land is certainly not zoned for medium density housing.
3. Placing this development at the edge of Manly Dam War Memorial Park means that the Asset Protection Zone rips through the flora and fauna in this park via clearing and ongoing hazard management. APZs should be incorporated onsite and not extend outside the development envelope. This is the tragedy of the commons in action.
4. There will be a major loss of flora and fauna onsite due to removal of 6,800m<sup>2</sup> of native vegetation onsite and adjoining the site, including removal of some 107 trees. This means major losses of both onsite habitat and linking habitat to Manly Dam and can be best described as land clearing.

For example, this clearing results in the loss of potential foraging habitat for threatened fauna species. "Eight threatened fauna species were observed using the site during the current and previous on-site surveys."

The proponent's own biodiversity assessments identified eight threatened species at the subject site...even more than the initial application ... which confirms the rich biodiversity of this area.

Eastern Pygmy Possum, Large eared Pied Bat, Square Tailed Kite, Grey Headed Flying Fox, Powerful Owl, Large Bent Winged Bat, Red Crowned Toadlet, Little Bent Winged Bat were all identified.

The development will also result in the loss of potential breeding habitat for threatened species.

"The grass swale habitat for the Red-crowned Toadlet will be entirely removed as a result of the proposal."

To try and compensate for the impact of threatened species the D.A outlines the intention of purchasing Bio-banking credits. This acknowledges that the developers realise there will be a loss, however this system is significantly flawed and biobanking will not be able to increase these types of lost animals and plants in other areas in order to "replace" them in any meaningful or accurate way.

5. Development within waterways and riparian land should be avoided and this development would impact on such land. Impacts to the sensitive Curl Curl Creek catchment are not fully modelled or known and could be disastrous for aquatic ecosystems including species such as the Climbing Galaxias Fish (of which the last population in Sydney lives in Manly Dam). In this case, the precautionary principal should be used and sensitive catchments like these protected, especially when extent of impacts are unknown.

6. The cumulative impacts on Manly Dam and its catchment of this development and other developments are not being considered in a strategic and wholistic manner. We have a precious, biodiverse gem, a bush playground with one of the last, natural, freshwater swimming areas in the middle of a busy urban area (complete with ancient, climbing Galaxies fish) that is still (just) linked to national park wildlife corridors but we are incrementally encroaching on it and degrading it via developments like this and associated APZs as well as through removal of vegetation in the upper catchment areas.

Please do not let this development proceed and please protect the biodiverse asset and precious, public, green space that is Manly Dam and its catchment. This development has too many negative externalities which the developer is not considering or paying for. The community, including future generations and the environment will end up paying for it.

Yours sincerely,  
Emily Fewster