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**Sent:** 20/07/2020 2:25:20 PM  
**Subject:** Online Submission

20/07/2020

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

I object to this Development Application for the following reasons;

The changed siting of the Communal Building to the east, and the removal of the bush fire Asset Protection Zone from within the Manly Warringah War Memorial State Park to west and south, will not mitigate nor remove the damaging environmental impacts of this development.

The development does not comply with Councils "Protection of Waterways and Riparian Lands Policy" the required priority to protect both significant threatened species and creeks classified as Group A are being ignored This development will severely impact on this riparian land, with the complete removal of the threatened Red Crowned Toadlet found on site. Bio Banking credits are a very poor and flawed way of compensating for this. All threatened species within (eight recorded on site) and surrounding the War Memorial Park should be protected for their future viability, as recorded populations are continually being isolated and destroyed not only by development, but wild fires, and hazard reduction burns. Threatened species recorded on site have not been acknowledged nor assessed in the both the Waterway Impact Statement and Bushfire Report.

Reference is made by the developer in documents that Council gave the developer a concession regarding the width of the riparian zone buffer, and this could be reduced. This is not recorded in the Pre Lodgement DA notes, in fact Councils Natural Environment Branch stated "should the APZ extend into riparian land, Council is unlikely to support the proposal on the basis of ecological impacts on a Group A catchment and that the proposal does not comply with Councils Protection of Waterways and Riparian Lands Policy and Clause E8 of the Warringah DCP 2011". This new development still does not comply with this Policy.

The number of trees to be removed, 85 as stated, does not appear to include (no plan has been submitted in the Arborist Report showing the location of these trees as required), the proposed removal of bushland to the north in the Sydney Water land for the APZ requirements. A Arborist Report should be submitted, and the impacts also on the threatened Pygmy Possum found in this Sydney Water easement should be assessed.

No Aboriginal Due Diligence Report was done as advised by the Aboriginal Heritage Office for the previous proposed development, this should be done for this current development application. Quote "The Aboriginal Heritage Office advised Council that there are known Aboriginal sites in the area and the area of the proposed development is identified as having high potential for recorded Aboriginal Sites. The Aboriginal Heritage Office recommends a preliminary inspection ('Due Diligence' under the National Parks and Wildlife Act 1974) by a qualified Aboriginal heritage professional. The assessment would provide information on what potential Aboriginal heritage issues exist on the land and recommendations for any further

action is required". Councils response is quite alarming. "The requirement of the Aboriginal Heritage Officer can be addressed by way of conditions, if the application is considered for approval". Obviously this will be too late, and it is unacceptable that Council should show so little regard in preserving our local aboriginal heritage.

Where will the construction zone be located? Will this impact on the supposed to be retained bushland to the west and south?

Impacts from extensive clearing and excavation will result in irreversible changes to the natural hydrology of the site. The negative impacts of approving this development cannot be successfully mitigated against by imposing conditions such as "Soil and Water Management Plans". Manly Vale Public Schools recent construction is an example of no such Plan being done, and the disastrous impacts polluted stormwater can cause from sites developed adjoining bushland and having sensitive waterways directly below. Not only sediment but cement, paint, chemicals and numerous other pollutants result from these construction sites, as seen, and Council and the EPA are woeful in stopping this. Fines are not a solution, and until better construction practices are developed and Council can successfully enforce the conditions they impose, then these developments should not be approved in sensitive catchments, such as the War Memorial Park. The development has not even been referred to the Council Heritage Officer as required, let alone, as one would think to the State Park Committee for comment.

The continual disregard of the dangers of siting vulnerable classed developments on ridge top bushfire prone land, and all the problems and extra pressures this involves should be taken more seriously by developers, and the advise of the Rural Fire Service adhered to not do so!

This development application should be rejected by Council.