
Sent: 20/07/2020 5:02:23 PM
Subject: Online Submission

20/07/2020

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

An email has been sent to council@northernbeaches.nsw.gov.au containing the formal submission from the NSW Nature Conservation Council. The text is pasted below.

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 150 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

Through our network of member groups, NCC is keenly aware of the incremental and cumulative loss of rare urban high value bushland in NSW over time. These losses are often associated with small projects and developments and are responsible for the ongoing degradation of our urban and suburban environments. Each loss is significant and our member groups advocate hard to prevent them.

NCC has been alerted by our member group, the Save Manly Dam Catchment Committee, to the proposed development in the Manly Warringah War Memorial State Park's bushland catchment. The development assessment has found that this site hosts several species listed as vulnerable and threatened under the NSW Biodiversity Conservation Act and under the Commonwealth Environment Protection and Biodiversity Conservation Act.

We support the objection of the Save Manly Dam Catchment Committee because:

- This site contains the only war memorial in Australia created by conserving natural bushland
- The site is of significant enough value to be nominated for national and state heritage status, having previously been on the National Estate Register
- There are high levels of connectivity with other areas of bushland to the south and west of the site. The land is contiguous with the Manly Warringah War Memorial Park, a 375ha park located on the western and southern boundaries of the subject land
- NSW has been experiencing drought conditions and lower than average rainfall, impacting the reliability of the surveying undertaken on the site. Species which may normally be present may not have been detected at the time of the surveying
- The site is on environmentally sensitive land at the headwaters of Curl Curl Creek catchment. The site is identified as a riparian buffer upstream of Curl Curl Creek, which supports aquatic vegetation and habitat. Any increase in urban development in Curl Curl Creek catchment can affect the viability of aquatic habitat downstream
- Save Manly Dam Catchment Committee are concerned that construction in this fragile catchment will seriously threaten the only population of Gondwanan Climbing Fish in Sydney

Housing development, while necessary, should actively avoid bush destruction wherever possible. The proponent of this project should seek to improve existing habitat values by

supporting community efforts to restore and preserve local vegetation. The current application instead accepts the loss of habitat for vulnerable and threatened species and fails to account for cumulative impacts outside of the surveyed area. It is our view that every alternative to harming precious ecology should be explored and pursued. The proposed development does not do so, and should be rejected in its current form.

We welcome the opportunity to discuss this matter further. Your key contact point for correspondence is policy and outreach coordinator, Jacquelyn Johnson, available on jjohnson@nature.org.au and (02) 9516 1488.