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**Sent:** 20/07/2020 11:15:30 PM  
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20/07/2020

MR Kevin Collins  
Select...  
Manly Vale NSW 2093  
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**RE: DA2020/0552 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100**

I object to DA2020/0552 at 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100, and request that Council reject the application.

The reasons include, but are not limited to the following.

1. Constructing seniors accommodation in a bushfire risk zone contradicts the advice given by the RFS in PBFP 2019. There are very good reasons for this recommendation by the RFS and it seems negligent to condone increasing the risk to vulnerable older people.
2. The DA is NOT supported by the Water Management Referral Response nor the Engineering Referral Response due to deficiencies with the proposal.
3. The conditional support by the Natural Environment Referral Response - Riparian is flawed. An extract reads...  
"Note that the riparian is still within the APZ zone and the proposal is not fully satisfying the Council's DCP and Protection of Waterway and Riparian Lands Policy, however the water quality treatment chain (bioretention and pond) and the proposed vegetation regeneration MIGHT mitigate the impact of the APZ zone. It is RECOMMENDED that the planting list is amended by an ecologist for (1) the bioretention to maintain a functional system (2) regeneration mix with native species/ local provenance." (my emphases)  
  
"Might mitigate" is not good enough and indicates the likelihood that the riparian zone WILL be compromised by the APZ. If that happens (as is likely) then the damage is done. Similarly, "recommended" is an insufficient guarantee - at the very least it should be "mandatory". Finally, it is by no means certain that you can effectively revegetate in a way that maintains the competing requirements of a healthy, functioning riparian zone and an APZ that needs regular clearing.
3. Low-cost seniors' living is needed in the NBC area, however this development is advertising luxury apartments. It is not appropriate to alienate multiple use Crown land for luxury apartments not available to the general public.
4. Good planning should take into consideration the current context. Manly Warringah War Memorial Park is a special reserve that commemorates in its entirety the sacrifices of our war service men and women. Protecting the very high ecological value of MWWMP honours these people, while preserving our wonderful natural heritage.

Over the years, Manly Dam has been subject to death by a thousand cuts , including Golf Course over-development, the Ardel debacle and the on-going environmental damage caused by the Manly Vale Public School rebuild. The widening of Wakehurst Parkway, the construction of a tunnel and the possibility of a High School being relocated on top of a toxic landfill at the creek's headwaters also remain very real threats to MWWMP. The integrity of the Park has been allowed to deteriorate by inappropriate development. Any more development with negative ecological consequences should not be allowed - this DA poses such a risk.

I strongly urge Northern Beaches Council to reject this DA.