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Subject: REV2021/0006 - SUBMISSION

Attachments: REV2021-0006 Creek&Catchment 20210215.doc; REV2021-0006 WaterMgtPolicyIssues.doc; REV2021-0006 181 Allambie Rd Issues 20210331.doc;

Rev2021/0006 (Review of DA2020/0552)
181 Allambie Rd Allambie Heights

The 3 attached files are a SUBMISSION from Save Manly Dam Catchment Committee.

To: Northern Beaches Council
Email: council@northernbeaches.nsw.gov.au

REV2021/0006 – Review of DA2020/0552
181 Allambie Road, Allambie Heights

14 February 2021

RE CREEK and CATCHMENT ISSUES

OBJECTION is made to the proposed development for the following reasons:
Following is an outline of issues relating to Curl Curl Creek and Catchment.

WARRINGAH DCP 2011

E8 – Waterways and Riparian land

The development does not satisfy this objectives and requirements of E8 clause, which warrants consideration for inclusion as a reason for refusal.

This control applies to land identified as waterway or [riparian land](#) as shown on [DCP Map Waterways and Riparian Lands](#).

Requirements include: “Developments shall comply with the requirements of Council’s [Protection of Waterway and Riparian Land Policy](#) and Water Management Policy.”

PROTECTION of WATERWAYS and RIPARIAN LAND POLICY

Waterways and riparian land in the Warringah local government area are to be managed so that priority is given to those that:

- are classified as Group A Creeks etc.

“Bushfire asset protection zones shall be maintained outside of riparian land.”

“Development within waterways and riparian land should be avoided.”

RIPARIAN BUFFER

Initial advice in 2018:

“The APZ of the proposed development extends into riparian lands, contrary to Council's DCP and Protection of Waterway and Riparian Lands Policy. The applicant was advised during the Pre-Lodgement Meeting process that this is unlikely to be supported.”

In the previous DA2018/1667 and current DA2020/0552:

“The majority of area proposed for development is mapped as Waterways and Riparian Lands (Warringah DCP 2011) which is based on the Riparian Buffer around Curl Curl Creek (Warringah Creek Management Study (WCMS 2004)).”

The development application (DA2020/0552) contains no reference to the riparian buffer that is mapped in the Warringah DCP 2011 – Waterways and Riparian Lands MAP.

The development application includes a Map (titled Drainage lines and 10m buffer) that shows a ‘riparian buffer’ confined to a 10m margin alongside the on-site watercourse and excavated channel.

The 10m buffer may be a standard width for a 'first order creek' but it is not adequate to protect the sensitive catchment and waterway of Curl Curl Creek downstream of the development site.

The riparian buffer shown in the Warringah DCP 2011 E8 – Waterways and Riparian Land Map is based on the Warringah Creek Management Study (2004) (WCMS) and reflects the environmental sensitivity of the site within the Curl Curl Creek catchment.

In the WCMS (2004) Curl Curl Creek catchment is classified as a Group A catchment. The riparian buffer encompasses undeveloped land, including bushland, at the steep headwaters of Curl Curl Creek. The undeveloped land has an important function as a riparian buffer to protect the catchment and downstream waterway.

The land use function of the riparian buffer extending across the undeveloped land at headwaters of Curl Curl Creek has not been acknowledged as a land use constraint within a Group A catchment.

In the WCMS(2004) the classification of catchments is “based on the ecological values and the extent of catchment imperviousness, as a sustainable development (catchment capacity) limit: Group A maintain at less than 10% connected impervious area (Wheeler, Deep, Curl Curl)”

How to ensure that less than 10% site coverage will be maintained for the Group A catchment if the extent of the riparian buffer is reduced to a 10m margin?

An impervious area of less than 10% is unlikely to be maintained if extensive development is permitted in a riparian buffer of a Group A catchment.

The riparian land is not just about a margin adjacent to an excavated channel or diverted waterway, it is about the sensitivity of the catchment and associated land use. The riparian buffer identifies land where development is likely to significantly affect a waterway.

WARRINGAH DCP 2011

Clause E8 – Waterways and Riparian land applies to riparian land identified in the DCP MAP.

The DA does not comply with the objectives or requirements of the WDCP 2011 - Waterways and Riparian Land Policy. So why is it recommended for approval?

The DCP is a matter for consideration under the EP& A Act s4.15 Evaluation. The riparian buffer shown in the DCP Map relates to the context of the site and would appear to take precedence over a generic guideline for a first order creek.

The DCP map shows the riparian buffer for Curl Curl Creek, not the core riparian zone for the watercourse on-site. The riparian buffer in the DCP map encompasses a broader area to protect the ecological values of the Group A Curl Curl Creek and catchment.

The DCP is a land use constraint that discourages development within the riparian buffer. The proposed development is not compatible with the land use constraint for a Group A catchment.

ASSET PROTECTION ZONE

The communal building may be only 50m from the creek, but the APZ extends 85m from the building and overlaps the riparian zone.

The APZ in the riparian zone will require the removal of vegetation and is likely to affect aquatic vegetation and habitat due to changes in water temperature etc.

The removal of vegetation for APZ (inner and outer) in the riparian buffer will adversely affect the natural environment and sustainable management of Curl Curl Creek catchment.

WATER QUALITY

The development will result in extensive change to land use with likely impacts and potential risks from changes to water quality (urban pollutants), hydrology (low flows), erosion and sediment that will adversely affect Curl Curl Creek.

For 'undeveloped land' in a Group A or B catchment, the Water Quality Management Policy stormwater quality objectives and criteria require a 'neutral or beneficial' impact on waterways.

PL 850 WATER MANAGEMENT POLICY 2017

The Stormwater Quality Objectives trigger is:

For Group A and B Catchments: "Land on which development is proposed is undeveloped, in a natural condition or less than 10% impervious."

The proposed development will be located on land that is predominantly undeveloped. The main development is the paved access road that terminates near Eva's Track in the Park. The existing buildings are not within the land proposed for development. The reference to 'undeveloped land' refers to the land on which the development is proposed – or the 'development site'. It does not include existing development elsewhere on the site.

If the reference to 'undeveloped land' needs to be further refined, then the attribute 'less than 10% impervious' also warrants consideration. Based on a preliminary calculation, the existing impervious area (including the access road) is less than 10% of the land on which development is proposed. This applies even if the bushland area west of the watercourse is excluded.

If the land on which the development is proposed is undeveloped and/or less than 10% impervious, then the following Water Quality Criteria apply.

WATER QUALITY CRITERIA

Stormwater Quality Objectives (Table 3)

Criteria: Stormwater Quality

"Stormwater quality discharging from the development shall not impact the receiving waters. Reference shall be made to local data if available, including the Warringah Creek Management Study and the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC), or other widely accepted guidelines."

AQUATIC HABITAT

Will reference be made to local data such as aquatic fauna and habitat?

Will ANZECC Guidelines to protect aquatic habitat be applied?

What additional criteria for stormwater quality will be considered
e.g. water temperature, chemical makeup and sediment loads?

Criteria: Sediment

"Runoff from the development must be retained at natural discharge rates and sediments

controlled at the source.”

Criteria: Hydrology

“Natural flow regimes must be retained.”

How will low (base) flow be affected? The undeveloped land has minimal hard surface area and allows for the infiltration and seepage of rainfall runoff across the site. The development will result in the removal of vegetation and a significant increase in hard surfaces. This will alter the natural flow regime and is likely to affect low flow.

ENVIRONMENTAL RISKS & IMPACTS

Curl Curl Creek is an important component of the natural environment within Manly Dam Catchment and the adjoining MWWM State Park.

The potential impacts and environmental risks associated with the development pose a significant threat to the ecological values and sustainable management of Curl Curl Creek.

The likely and potential adverse impacts on Curl Curl Creek are not compatible with the protection of the natural environment and the adjoining heritage conservation area.

The proposal is not compatible with WLEP2011 Objectives:

1.2 Aims of the Plan

(f) in relation to environmental quality, to: protect, conserve and manage biodiversity and the natural environment.

(g) in relation to environmental heritage, to recognise, protect and conserve...areas of natural...heritage that contribute to the environmental...heritage of Warringah.

Re CONDITIONS

The proposed Conditions are not adequate to protect Curl Curl Creek and catchment.

As demonstrated elsewhere, it is highly probable that sediment will be washed into the downstream waterway. The erosion and sediment controls are unreliable and in spite of conditions pose a considerable risk to sensitive waterways, especially with erosive soils.

The conditions aim to mitigate but will not avoid adverse impacts on Curl Curl Creek.

The proposal is a significant threat to the ecological values of Curl Curl Creek and is not compatible with conservation values of the surrounding natural environment.

MONITORING & MAINTENANCE

Creek and catchment protection will be reliant on human intervention and conditions of consent being complied with in perpetuity. The natural ground cover that currently protects the catchment will be removed for buildings and roads, thus introducing a significant impervious area within the slope immediately above Curl Curl Creek. This will change the hydrology and be an ongoing source of urban pollutants and potential weed invasion downstream.

In the adjoining Park the burden of maintaining Curl Curl Creek and removing weeds etc. will be borne by a public authority.

ESD PRINCIPLES

WATER MANAGEMENT ACT 2000 - SECT 3

Objects include:

- (a) to apply the principles of ecologically sustainable development, and*
- (b) to protect, enhance and restore water sources, their associated ecosystems, ecological processes and biological diversity and their water quality, and*
- (f) to integrate the management of water sources with the management of other aspects of the environment, including the land, its soil, its native vegetation and its native fauna,*

The Protection of Waterways and Riparian Land Policy provides “guidance and direction having regard to the legislative framework of, and guidelines associated with, the Water Management Act 2000 (NSW)”. “The object of the Act is the sustainable and integrated management of the State's water for the benefit of both present and future generations.”

WARRINGAH CREEK MGT STUDY

The development proposal does not satisfy the following:

Principle (for Group A and B creeks):

“Preserve all natural components that contribute to ecological value – particularly streamflow, water quality and flora/fauna.”

Performance criteria include:

- No artificial barriers to capture water
- Site imperviousness is less than 10% etc.
- All development is outside riparian zone and riparian buffer zone

“relatively small changes in catchment land use can have significant impacts on flows, which in turn can strongly influence ecology.”

SENIORS HOUSING

WCMS 2004

Seniors housing (SEPP5)

It is recommended that an application for exemption from SEPP5 be made for land identified on the Warringah Local Environmental Plan on the basis of it being ‘environmentally sensitive land’:

This includes:

- *all land within riparian buffers of Group A and Group B creeks; and*
- *all land within the catchment of Group A creeks.*

The seniors housing proposal is within a riparian buffer of a Group A creek.

The recommendation is that Group A catchments be identified as ‘environmentally sensitive land’ for the purpose of SEPP5 – Seniors Housing.

In September 2007, the revised and renamed seniors housing SEPP (Housing for Seniors or People with a Disability) 2004 introduced a site compatibility clause for seniors housing.

Under Clause 25 (5) (b) (i) a consent authority must take into consideration:

the natural environment (including known significant environmental values, resources or hazards) and the existing uses and approved uses of land in the vicinity of the proposed development,

The WCMS 2004 recommendation is based on the ecological values of Group A catchments and the sustainable development (catchment capacity) limit of 10% impervious area.

The recommendation is relevant to the subject site and an indication that the seniors living proposal, which is a medium density development, is not compatible with the ecological values of Curl Curl Creek catchment.

LAND USE

Why no mention of Group A Catchment sensitivity re land use?

“Catchment land use is a major (if not *the* major) factor governing conditions of most creeks.”
(8.1.2 WCMS 2004)

Re Warringah’s Creeks: “without further significant intervention on two key issues – land development and weed proliferation – the remaining high quality natural areas will be lost and rather than being assets for future generations, they will become burdens”. (WCMS 2004)

CATCHMENT SENSITIVITY

“Curl Curl Creek is classified as a Group A creek meaning it has very high ecological value and less than 10% connected impervious area (WCMS 2004).”

“Generally, Group A creeks can sustain very little further development before their aquatic ecosystems will change substantially, especially when they are close to natural condition and minor perturbations can have a major impact (WCMS 2004).”

LAND USE - LIKELY IMPACTS

Will likely environmental impacts, including the high probability of adverse impacts on the waterway and catchment, be considered (for example, under the EP&A Act)?

The development will result in extensive intervention and interception of runoff. Water quality etc. will be heavily reliant on monitoring and maintenance. This outcome does not satisfy the environmental objectives of the WLEP2011 and requirements of the WDCP2011 E8 – Waterways and Riparian Lands etc. to provide reliable protection for the waterway.

A strong correlation exists between urban development and adverse impacts on waterways and aquatic habitat. Why is evidence based information re this correlation not relied upon to predict likely environmental impacts on Curl Curl Creek?

CONCLUSION

The likely and potential impacts of the proposed development on Curl Curl Creek and Catchment is major concern. The environmental issues associated with the Group A Creek and catchment warrant consideration and support the refusal of the proposed development.

Ann Sharp

On behalf of Save Manly Dam Catchment Committee

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REV2021/0006 (Review of DA2020/0552) - SUBMISSION
181 Allambie Road, Allambie Heights

4 March 2021

OBJECTION is made to the proposed development for the following reasons:

The proposal does not satisfy the objectives and requirements of the Water Management Policy.

This includes an aim of the Policy:

To protect and improve the ecological condition of our waterways and surrounding bushland.

PL 850 WATER MANAGEMENT POLICY 2017

The Stormwater Quality Objectives [Table 3] trigger is:

For Group A and B Catchments: "Land on which development is proposed is undeveloped, in a natural condition or less than 10% impervious."

The proposed development will be located on land that is predominantly undeveloped. The main development is the paved access road that terminates near Eva's Track in the Park. The existing buildings near Allambie Road are not within the land proposed for development. The reference to 'undeveloped land' refers to the land on which the development is proposed – or the 'development site'. It does not include existing development elsewhere on the site.

If the reference to 'undeveloped land' needs to be further refined, then the attribute 'less than 10% impervious' also warrants consideration. Based on a preliminary calculation, the existing impervious area (including the access road) is less than 10% of the land on which development is proposed. This applies even if the bushland area west of the watercourse is excluded.

PL 850 WATER MANAGEMENT POLICY 2017 (Extract)

Principles

The aims of the Water Management Policy include to:

- *Protect and improve the ecological condition of our beaches, lagoons, waterways, wetlands and surrounding bushland*

Section 8.1 – Stormwater Quality

This section applies to the proposed development:

Development Type: *Residential Flat Buildings:*

Development with a site area greater than 1000m²

Site/Development Characteristics: *Increased hard surfaces:*

Development proposing an increase in impervious area of more than 50m²

8.1 Stormwater Quality

Stormwater treatment measures are required to ensure the development does not impact on the receiving waters. The stormwater quality requirements are generally aligned with the catchment classifications as detailed in the Warringah Creek Management Study.

8.1.1 Stormwater Quality Requirements

To determine which stormwater requirements apply to the site use the table below to identify the land type.

Land Type

Undeveloped land within a Group A & B Catchment

Notes:

- i. Refer to the Definition section at the end of this Policy for definitions for “Undeveloped Land”.*
- ii. Catchment Boundaries & Groupings are identified in the Warringah Creek Management Study*

Definition

Undeveloped land means land:-

- a) that has not been subject to prior development, or*
- b) is in a state of nature, or*
- c) with an impervious area of less than 10%.*

TABLE WHICH APPLIES

Table Which Applies

Table 3 – Stormwater Quality Objectives

Re UNDEVELOPED LAND

The proposed development is located in Curl Curl Creek Catchment, which is classified as a Group A Catchment in WCMS 2004.

The proposed development will take place on undeveloped land that appears to satisfy the definition of ‘undeveloped land’ in the Water Management Policy.

“Undeveloped Land - means land; that has not been subject to prior development, or is in a state of nature, or with an impervious area of less than 10%”.

These two factors, ‘undeveloped land’ within a ‘Group A or B Catchment’, provide a trigger for the application of Stormwater Quality Objectives and Criteria (in Table 3) that are more appropriate for environmentally sensitive catchments.

Relevant Points:

- The proposed development will be located on land that is predominantly undeveloped.
- The footprint of proposed buildings and associated infrastructure will be located within an existing landscaped area that has not been subject to prior development.
- Development on the land is confined (mainly) to a paved access road that traverses the land. (This road terminates at Eva’s Track and is currently used as a pedestrian walkway.)
- On the ‘development site’ the existing impervious area is estimated to be less than 10%. (This applies even if the bushland area west of the on-site watercourse is excluded.)

- The existing buildings that are located near Allambie Road are not within the land proposed for development.

If the land on which the development is proposed satisfies the definition of ‘undeveloped’, for example is less than 10% impervious, then Stormwater Quality Objectives and Criteria (in Table 3) would apply. [See attachment]

Table 3 – Stormwater Quality Objectives

Importantly, the Stormwater Quality Criteria and Objectives in Table 3 would allow environmental information specific to Curl Curl Creek to be applied to the proposed development.

This includes:

- Water quality parameters that relate to freshwater ecology.
- Reference to environmental information e.g. re aquatic habitat.
- Appropriate ANZECC Guidelines to protect aquatic habitat and water quality.

Currently, the environmental data re Curl Curl Creek and catchment has not been taken into account. Yet this information is directly relevant to site compatibility issues and heritage conservation.

If Table 3 does not apply, Table 4 applies to all other development.

Table 4 – General Stormwater Quality Requirements

Pollution and Performance requirements in Table 4 are based on:

“The percentage reduction in the post development mean annual loads are relative to the loads from the proposed development without treatment applied.”

For Curl Curl Creek, which is a Group A Creek, this would result in an increase in pollutant loads compared to its current condition with water quality that sustains aquatic habitat.

The General Stormwater Quality Requirements are intended for development in an urban environment and are inappropriate for undeveloped land in a Group A or B catchment.

- The performance requirements allow an increase in pollutants, such as phosphorous and nitrogen, which are associated with weed invasion.
- The performance requirements allow an increase in discharge for larger storm events that erode waterways and reduce water quality.
- The potential changes to natural flow regimes would adversely affect freshwater ecology and aquatic habitat etc.

The proposed development satisfies the General Requirements but is predicted to significantly increase phosphorus and nitrogen, as well as flow volumes in the downstream waterway.

The performance outcomes of the proposed development would result in the ongoing degradation of Curl Curl Creek.

The development poses a significant threat to Curl Curl Creek catchment and cumulative impacts associated water quality, sediment and hydrology are likely to be irreversible.

The Stormwater Quality Requirements that apply to the undeveloped land need to be reviewed to protect Curl Curl Creek and catchment - and the proposed development refused.

Ann Sharp

On behalf of Save Manly Dam Catchment Committee

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ATTACHMENT

Table 3 – Stormwater Quality Objectives

Criteria & Objectives

Stormwater Quality

Stormwater quality discharging from the development shall not impact the receiving waters. Reference shall be made to local data if available, including the Warringah Creek Management Study and the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC), or other widely accepted guidelines.

Sediment

Disturbance to stream and wetland sediments is to be minimised by regulated discharge of stormwater and dissipation of flows at discharge locations. Runoff from the development must be retained at natural discharge rates and sediments controlled at the source.

Hydrology

Stormwater flow is to mimic natural conditions and ensure a dispersed pattern of flow, avoiding centralised or concentrated discharge points into the wetland or waterway. Natural flow regimes must be retained. The reduction or increase in flows, alteration in seasonality of flows, changes to the frequency, duration, magnitude, timing, predictability and variability of flow events, altering surface and subsurface water levels and changing the rate of rise or fall of water levels must be avoided.

All other land not identified above

Table 4 – General Stormwater Quality Requirements

Pollutant & Performance Requirements

- *Total Phosphorous 65% reduction in the post development mean annual load**
- *Total Nitrogen 45% reduction in the post development mean annual load**
- *Total Suspended Solids 85% reduction in the post development mean annual load**
- *Gross Pollutants 90% reduction in the post development mean annual load (for pollutants greater than 5mm in diameter)**
- *pH 6.5 - 8.5*
- *Hydrology The post-development peak discharge must not exceed the pre-development peak discharge for flows up to the 2 year ARI*

Note:

**The percentage reduction in the post development mean annual loads are relative to the loads from*

To: Northern Beaches Council
Email: council@northernbeaches.nsw.gov.au

REV2021/0006 (Review of DA2020/0552) - SUBMISSION
181 Allambie Road, Allambie Heights

31st March 2021

Objection is made to the proposed development at 181 Allambie Road, Allambie Heights.

The development proposal for the 24 apartments is on Crown land in Manly Dam Catchment. The proposal is for seniors housing on bushfire prone land adjoining Manly Warringah War Memorial State Park.

The development proposal would affect Curl Curl Creek, which traverses Manly Dam Catchment. Approval of this development would appear to contravene Crown Lands Management Act 2016 (CL Mgt Act Section 9.3). The proposal is also inconsistent with Principles of Crown land management (CL Mgt Act Section 1.9).

Crown Lands issued owner's consent in 2018 to allow the development application to be submitted to Northern Beaches Council. However, this consent was provided in advance of relevant information re environmental impacts on Curl Curl Creek and catchment.

The Owner's Consent form previously included a Land assessment section, but this has now been removed. As a consequence, land use issues relevant to Curl Curl Creek and Manly Dam Catchment were not taken into account prior to issuing owner's consent.

A land assessment having regard to prescribed land evaluation criteria (Crown Lands Regulation 2006 - Reg 19) would have identified that the Crown land is an environmentally sensitive site. Relevant criterion include: "the ecological sustainability of potential land uses of the land and any catchment of which the land forms part".

We are particularly concerned that the requirement for a Land Assessment (under the former Crown Lands Act 1989) has been deleted from the Crown Lands Management Act 2016. In terms of evaluating land use, there appears to be a procedural flaw in issuing owner's consent in the absence of a land assessment. Coincidentally, the new Act came into effect on 1 July 2018 and the initial development application was submitted on 11 October 2018.

The proposed private development for 24 apartments is not in the public interest and will alienate Crown land. The removal of vegetation for asset protection will inhibit or prevent bushland areas being incorporated into Manly Warringah War Memorial State Park, as per Plan of Management 2014.

The development was refused by the Local Planning Panel in 2019 and 2020. If approved, the conditions imposed will not prevent adverse impacts on Crown land or the Heritage Conservation Area in Curl Curl Creek catchment.

The proposed development is not compatible with the conservation values of Crown land in Manly Dam Catchment and its future management for conservation.

LAND USE ISSUES

- Bushfire prone land – vegetation buffer
- Riparian buffer at headwaters of Curl Curl Creek
- Direct and indirect impacts on adjoining natural areas, including reserve

WATER QUALITY CRITERIA

Neutral or beneficial impact is a prerequisite that is necessary to protect Curl Curl Creek and Manly Dam Catchment. Also, avoidance of risk and potential impacts on creek ecology, not just measures to mitigate adverse impacts.

The development will impact on the isolated (potentially endangered) population of the ‘climbing galaxias’ native fish and the two species of crayfish that inhabit Curl Curl Creek.

ENVIRONMENTAL IMPACTS

The risks and likely outcomes of the proposal on the heritage conservation area have not been adequately assessed.

Council / Crown land – inability to adequately protect creek and control / prevent pollution from urban development in riparian land.

Water quality and flow impacts on creek, including sediment, with reduction in macro-invertebrates / aquatic habitat / fauna, and increased weed invasion.

Impervious areas and road runoff etc. - urban stormwater pollutants and likely temperature increase due to rainfall on exposed hard surfaces etc. / removal of vegetation.

Increased hazard reduction of adjoining bushland and (higher) frequency burns reducing biodiversity – due to close proximity of development to bushland. [See North Head email.]

Climate change and likely increase in hazard / APZ.

Informal impacts on surrounding bushland due to loss of park-like area for outdoor recreation and open space purposes associated with existing seniors housing.

Re POLLUTION OF WATERWAYS

The proposal will pollute waters in Crown land and be a source of pollution on Crown land.

To permit this development would appear to be a contravention of the Act.

Crown Lands Management Act 2016

9.3 Pollution or contamination involving Crown land

(1) A person must not do any of the following--

(a) pollute or contaminate Crown land or any waters in, on or under the land,

(b) pollute or contaminate other land or any waters in, on or under the land if the source of the pollution or contamination is in, on or under Crown land.

: Maximum penalty--as determined under [section 11.7](#).

(2) A person must not cause or permit a contravention of subsection (1).

: Maximum penalty--as determined under [section 11.7](#).

PRINCIPLES OF CROWN LAND MANAGEMENT

Principles of Crown land management

1.4 Principles of Crown land management

For the purposes of this Act, the

"principles of Crown land management" are--

(a) that environmental protection principles be observed in relation to the management and administration of Crown land, and

(b) that the natural resources of Crown land (including water, soil, flora, fauna and scenic quality) be conserved wherever possible, and

(c) that public use and enjoyment of appropriate Crown land be encouraged, and

(d) that, where appropriate, multiple use of Crown land be encouraged, and

(e) that, where appropriate, Crown land should be used and managed in such a way that both the land and its resources are sustained in perpetuity, and

(f) that Crown land be occupied, used, sold, leased, licensed or otherwise dealt with in the best interests of the State consistent with the above principles.

The proposal is not consistent with the principles of Crown land management.

Ann Sharp

On behalf of smdcc

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