**Sent:** 31/03/2021 10:08:17 PM

Subject: Online Submission

31/03/2021

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## RE: REV2021/0006 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100

I strongly object to the proposed development:

- 1. This development is very similar to the previous development application that was refused in 2019 due to an unacceptable impact on the natural environment.
- 2. The peripheral improvements are token measures that can be made independently of the development and do not compensate for the direct, indirect and potential negative impacts on the natural environment within and adjoining the Crown land site.
- 3. The site is within a bushfire prone location that is not suitable for seniors housing.
- 4. The main bushfire threat will be the Park to the west and south west. The development will introduce an ongoing land use conflict between the conservation values of the Park and providing asset protection for this development on the adjoining Crown land.
- 5. The development is not compatible with the existing use of the adjoining Manly Warringah War Memorial Park for the conservation of native flora and fauna, protection of waterways in Manly Dam Catchment and public recreation.
- 6. The existing aged care facility at the eastern end of the site has a set back from the bushfire hazard of over 100m which greatly reduces the risk of ember attack.
- 7. The proposed development is much nearer to the bushfire hazard and would require the removal of vegetation for asset protection from within the Crown land site and adjoining public land.
- 8. The recent bushfires during 2019/20, and the likely increased risk of bushfire, is a warning to avoid locating new Special Fire Protection Purposes development, such as seniors housing, in vulnerable bush fire prone locations.
- 9. The bushland on the Crown land and the adjoining Manly Warringah War Memorial Park is significant and shares a common boundary with the Park to the west and south.
- 10. The asset protection zone (APZ) is not confined to the site but would require the removal of vegetation in perpetuity from adjoining public land.
- 11. The APZ would overlap bushland within the Crown land site and adjoining public land. It would also overlap riparian land within the subject site and adjoining Park.

- 12. The development will be located on land identified as a riparian buffer that provides the important function of protecting Curl Curl Creek immediately downstream.
- 13. Curl Curl Creek is classified as one of only three Category A creeks in Warringah. Curl Curl Creek catchment is identified as environmentally sensitive with less than 10% impervious area.
- 14. Curl Curl Creek supports aquatic vegetation and habitat and is very sensitive to land use changes within the catchment, particularly within riparian land. Even small changes to land use can significantly affect the waterway and aquatic habitat downstream.
- 15. The protection of conservation and heritage values of the Park are dependent on the protection of the natural environment within the adjoining Crown land.
- 16. The proposed development, similar to medium density housing, would be located on a riparian buffer and also require the removal and modification of surrounding bushland.
- 17. The proposed development is not suitable for the subject site. A seniors housing development can be located elsewhere, but this Crown land has a unique and important function in protecting the environment in Manly Dam Catchment and providing landscape open space.