
Sent: 20/07/2020 11:39:43 PM
Subject: Objection to Development Application No: 2020/0552 - 181 Allambie Road
Attachments: DA2020-0552 181 Allambie Rd AC submission.docx;

Development application No: 2020/0552
Address: 181 Allambie Road, Allambie Heights

Please find attached objection to DA 2020/0552 181 Allambie Road, Allambie Heights.

Regards,
Ann Collins

A. Collins
41 Gordon Street
Manly Vale 2093

Development application No: 2020/0552

Address: 181 Allambie Road, Allambie Heights NSW 2100
(Extension of Allambie Heights Village / William Charlton Village)

I **strongly object** to DA 2020/0552 181 ALLAMBIE RD for the reasons not limited to these outlined below.

The current proposal is for the construction of Seniors Housing development incorporating 24 independent living units, a private communal building, car parking and associated works on CROWN LAND in bushfire prone area. (It is presented as affordable social housing - but is marketed as luxury units on AHV website.)

Whilst I agree more seniors' housing is required in the Northern Beaches, it should not be at the expense of ongoing environmental impacts, edge creep into MWWMSP, inappropriate use of Crown Land, potentially wiping out a small and isolated population of Galaxias Climbing fish and polluting the waters into the catchment. 181 Allambie Rd is located directly above/at the headwaters of Curl Curl Creek and feeds into the catchment for Manly Dam.

In 2019, the NBC Local Planning Panel **refused** the application (D.A. 2018/1667) stating that this development will have a seriously negative impact on the irreplaceable bushland and waterways of the adjoining Manly Warringah War Memorial State Park. The current proposal is very similar. 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.

I note that sections of Northern Beaches Council do NOT support this DA and other sections have imposed Conditions.

The development does not comply with Councils "Protection of Waterways and Riparian Lands Policy".

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". We have witnessed and are still suffering from failures at Manly Vale Public School. This development will further degrade the ability of the catchment to slow down, soak up and clean our precious freshwater

The site contains bushland that is contiguous with the Manly Warringah War Memorial Park. This bushland is a wildlife corridor; it is habitat for fauna including 8 threatened species; it is food for these and other native species.
Why does it get classified as expendable in an APZ?

How can the proponent discuss Bio-banking if they do not know there is going to be destruction? Dealing with the local extinction/disruption of threatened species on the site

by purchasing offset credits is flawed and does nothing to protect our local ecosystem and identified flora and fauna.

It is Bush-Fire Prone land. I understand all the comments have been made against a superseded Planning for Bushfire Protection 2006 (now replaced by PBFP November 2019), the operative document. The application continually refers to the 2006 document and fails to measure proposed bush fire management against the recently adopted 2019 criteria. PFBP 2019 specifically "discourages" placement of a SFPP project within a Bush Fire Zone. Who will be responsible for maintaining the APZ? Does the proponent intend to impose the cost of manual clearing and hazard reduction in perpetuity upon the relevant adjoining land holders, i.e. NBC and also Sydney Water.?

This is adjoining a War Memorial Park. This reserve was set aside in the 1920s to honour the sacrifice of all those who fought and died in the First World War. It was to be a lasting tribute to their memory, where subsequent generations could enjoy the beauty of nature, while also being reminded of the horrors of the Great War. Most specially, it is the only "living" war memorial in Australia, created by conserving natural bushland with the whole area as the memorial. Rather than diminish it by whittling away its area and integrity, we should be increasing the protection offered for its future.

This is Crown Land. The development would be located on Crown land that was reserved for public and semi-public use. This is not consistent with this planned usage.

*The Applicant has identified **that they are exempt from the provision of development contributions** under the Northern Beaches Council Contributions Plan 2018. The Ministerial Direction issued by the NSW Minister for Planning dated 14 September 2007 identifies that development contributions are not applicable to DA's made by social housing providers. A social housing provider is defined in the SEPP (Affordable Rental Housing) 2009 as, among other things, a not-for-profit organisation that is a direct provider of rental housing to tenants.*

How does this development equate to social housing AND the applicant does not contribute back into the Council with Development Contributions! An \$18 million project! Is this rental to tenants?

In June 2019 I spoke against the very similar DA at the Local Planning Panel. All the arguments still stand – please reject the Development Application.

“Thank you for the opportunity to speak today.

My name is Ann Collins and I represent Save Manly Dam Catchment Committee and I am a concerned resident.

My main argument is that this current development proposal cannot be looked at in isolation.

The Manly War Memorial STATE PARK and its surrounding crown lands are being eroded on all sides and this is impacting and will impact further on water quality and biodiversity values. It was gazetted a War Memorial Park and a State Park to attempt to protect these important values.

Currently in the pipeline are: (show on MAP – “death by a 1000 cuts”):

* this proposed development of aged care facilities;

* the proposed Forest High School relocation to the Aquatic site,

* the redevelopment of the Warringah Road / Wakehurst Parkway road systems and hospital

* the proposed tunnel and widening of the Wakehurst Parkway to 4 lanes;

and we are dealing with the ongoing impact of the Manly Vale Public School redevelopment and Ardel Housing as referred to by my colleague Malcolm Fisher.

These developments are having or will have impacts on the Manly Dam ecosystems and catchment, including downstream to Queenscliff.

This needs to be looked at as a whole of park, catchment and ecosystem issue and not a patchwork “development by development” approach.

I fully support and commend the Council’s recommendation to refuse this application in areas of:

- Environmental considerations
- Waterway and Riparian Lands
- and Bushfire risk / management

However I am still concerned about:

- Stormwater and proposed swathes – top of catchment
- Visual Impact – with no Visual impact assessment given. Views from other areas of Manly Dam – not just the Dam Wall (Heritage listed)
- Affordable housing - Consistency with model of operation? Affordable rental housing to tenants?
- Lease - Inability to get access to the Lease.
- Aboriginal heritage – possible items.
- Insufficient Community consultation – adjoining areas are all Nursing homes owned by same group. Manly Daily is smaller and useless.

Can I turn the tables for a moment?

My colleagues and I look like the “bad guys” here as we seek to prevent the development of Seniors and Aged Care housing because of a “few environmental issues”.

However, when the Lease of Crown Land adjoining Manly Dam was acquired and developments were planned, this was a known bushland site with Riparian, Environmental and drainage protections already in place.

Total Earth Care has documented the different vegetation communities including weeds and exotics – which is now planned to be cleared for an APZ. “The reduced APZ (20-25metres) for the Class 10 building is set within the E8 Waterways and Riparian lands. This riparian

land has been previously cleared and currently supports a depleted native plant community and substantial weed infestations.”

According to their newsletter, Allambie Heights Village Ltd. reported a profit of \$2.25 million in 2017-2018.

The process of bush regeneration is well known, and yet, it appears no effort or expenditure has been taken to provide custodianship or remediate the site that is now desired for development or for an APZ! I completely disagree with concessions being made due to degradation reasons.

How come we are the “bad guys”?

The Applicants own reports also indicate: "Potential impacts of the proposed development include: - Increased erosion and sedimentation, especially during the construction phase; - Increased stormwater runoff during the operational phase due to an increase in impermeable surfaces; - Modification & Loss of habitat and connectivity due to the removal of vegetation; - Decrease in water quality and increase in nutrient loads; - Potential contamination of natural areas downstream including Manly Dam Reserve;"

Please help us to plan for a future in our area where people young and old can visit a place of beauty and unique, thriving ecological diversity and still enjoy swimming in fresh water.

In summary, please reject this application as:

*** this development is inappropriate for the site**

*** this development should be considered as part of a wider cumulative impact assessment of the MWWMSP.**

Thank you.”