
Sent: 11/02/2022 10:40:57 PM
Subject: DA2022/2039 - Submission
Attachments: FoNLC DA2022-2039 20220211.doc;

Please see attached submission from Friends of Narrabeen Lagoon Catchment.

Friends of Narrabeen Lagoon Catchment



P.O. Box 845, Narrabeen NSW 2101

11 February 2022

To: Northern Beaches Council
Attention: Adam Mitchell
Email: council@northernbeaches.nsw.au

SUBMISSION to Development Application DA2022/2039

Address: 70A Willandra Rd, Narrabeen

Dear Sir/Madam

We wish to object to the proposed development.

Our reasons for OBJECTION include the following:

The development would be located in core habitat of Wheeler Creek Catchment.

Warringah Creek Management Strategy states:

“Although natural catchment land use has been altered in Cromer Heights, the majority of the Wheeler Creek sub-catchment is characterised by natural vegetation with a very high degree of continuity, canopy cover, native species richness and community composition. This provides excellent potential for dispersal and refuge for native fauna.” “The creek itself also provides habitat for a number of important species, including the endangered Red-crowned toadlet, *Pseudophryne australis* and Giant Burrowing Frog, *Heleioporus australis* (NPA NSW, 2001).”

The development will remove or modify 0.39 ha (3,900 square metres) of bushland within Wheeler Creek Catchment.

The footprint of the dwelling is substantially larger than the a normal size dwelling.

The asset protection zone (APZ) would remove a wide area of surrounding bushland.

The proposed dwelling is in a high bush fire prone location.

The development is within the watershed of Wheeler Creek Catchment, which has high conservation values.

The site contains a threatened Coastal Upland Swamp downslope of the development.

The APZ abuts a 20 metre buffer adjacent to the threatened ecological community.

The development will remove threatened fauna species habitat. This includes foraging habitat and areas suitable for shelter and nesting by the Eastern Pygmy Possum.

The development will impact on ecological communities within the Catchment.

Warringah LEP 2000

The proposed development is not consistent with the requirement of the WLEP2000 Oxford Falls Valley Locality.

Desired Future Character (DFC)

- *There will be no new development on ridgetops.*
- *The natural landscape including landforms and vegetation will be protected and, where possible, enhanced.*
- *Development in the locality will not create siltation or pollution of Narrabeen Lagoon and its catchment and will ensure that ecological values of natural watercourses are maintained.*

The development is on a ridgetop and will mar the scenic amenity of Narrabeen Lagoon Catchment.

The development does not adequately protect the natural landscape and vegetation.

The excavation for the dwelling and in-ground pool would change the natural landform and drainage pattern. The rock outcrops are a distinctive natural feature of the site.

Direct impacts of the development include vegetation removal, habitat loss, soil disturbance and changes to hydrology.

The indirect impacts will affect a wider area including downslope areas that sustain water dependent vegetation.

The proposed single dwelling is not a low impact development.

Housing Density

The maximum housing density is 1 dwelling per 20 ha of site area.

The proposal is for a housing density of 1 dwelling for a site area of only 2.9 ha.

General Principles

Clause 56 - Retaining distinctive environmental features

Clause 58 - Protection of existing flora

Clause 61 - Views

Clause 76 - Management of stormwater

Clause 78 - Erosion and sedimentation

The development does not adequately protect existing flora or distinctive environmental features.

The development will be highly visible from vantage points in Narrabeen Lagoon Catchment.

The likely impacts of the development:

This development will have direct and indirect impacts on the natural environment including threatened species habitat, vegetation, soils and hydrology.

The suitability of the site for the development:

The site is not suitable for the proposed development, as it would be highly exposed to bushfire hazard and located in a high conservation catchment.

In conclusion, the development is in a high bush fire prone area and is not compatible with the long term protection and sustainable management of the natural landscape within Wheeler Creek Catchment.

A restriction should be placed on the title to preserve the bush land within the site if any approval is given.

Yours sincerely,