
Sent: 31/03/2021 3:39:41 PM
Subject: Online Submission

31/03/2021

MRS Susan Byrne
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RE: REV2021/0006 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100

I object to this development at 181 Allambie Road, Allambie Heights

The application should be refused for the following reasons:

Impact on Bushland and Biodiversity - The footprint is in proximity to the western portion of the site, and the APZ extends into adjoining land parcels, which are covered with high quality native vegetation and threatened species habitats.

Direct and indirect impacts to native vegetation will result from tree removals, clearing and modification for asset protection zones, sewer infrastructure, passive recreation, with increased and ongoing management of native vegetation and fauna habitat as part of the overall bush fire management measures.

The proposed development will directly and indirectly impact native vegetation and fauna habitat, including threatened species or vegetation communities with potential for a serious and irreversible impact as mapped on the Biodiversity Values Map.

The development is located on land adjoining public open space, and should protect, preserve and enhance the native bushland and natural qualities of the adjoining Park, and not threaten the protection or preservation of the bushland and fauna habitats. Additional impacts that require further assessment, and potentially additional biodiversity offsets, have not been adequately addressed in regard to a Bushfire Asset Protection Zone.

The form and scale of the proposal is not suitable for the available site area.

The location and design of the proposed development does not satisfy the objectives and/or requirements of the WDCP 2011, including E2 Prescribed Vegetation, E5 Native Vegetation, E6 Retaining unique environmental features, and E7 Development on land adjoining public open space.

The proposed development should be refused as a part of the required APZ is located on land external to the site and the proposal relies on ongoing management of vegetation on land within the adjoining Manly Warringah War Memorial State Park and Sydney Water pipeline corridor.

Has Crown Lands as owners given consent to this APZ?

The adjoining MWWMSF is subject to existing asset protection and strategic fire advantage management requirements, both as a result of a historic agreement with the adjoining development at Allambie Heights Village, and the Manly Warringah War Memorial Fire Regime Management Plan. However, to achieve the full 85m setback as shown in Map 2 of the Bush Fire Management Plan (Total Earth Care Feb 2020), the development relies on the modification of native vegetation to create an asset protection zone beyond what currently exists in both extent and fuel load.

The additional APZ requirements will result in unacceptable direct and indirect impacts to native vegetation and fauna habitat, including threatened species or vegetation communities with potential for a serious and irreversible impact as mapped on the Biodiversity Values Map. The proposed development should be refused as it is not in the public interest.

Planning for Bush Fire Protection 2019 indicates APZs should be contained wholly within

development sites and this will facilitate appropriate management by the development site owner in perpetuity. The Development Application was submitted after this new 2019 policy came into effect, yet the submitted report relies on the old legislation.

The location of the proposed APZ within the adjoining Sydney Water land to the north, relies on the written agreement of Sydney Water and the impact on native vegetation and threatened species habitat has not been properly assessed in the BDAR.

Pursuant to Clause 25 (5) (ii) of SEPP (Housing for Seniors or People with a Disability) 2004, the proposal will have unreasonable impacts on the natural environment and due to this impact, the proposal is inconsistent with the clause.

The Waterway Impact Statement submitted is inadequate, as the impacts "offsite" have not been properly assessed, and this document falls short of what is required by Council.

Details of the proposed pond etc. and other plans submitted have not been made available on Council's website for this development as required.

An Aboriginal Due Diligence Report should be conducted for the DA submission, not after DA approval has been given. A registered aboriginal site exists in close proximity to this development, and the site features, being on a ridgetop and having flat sandstone surfaces makes the importance of having this survey done, as was stated by the Aboriginal Heritage Office as a requirement, but ignored by Council.