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Subject: Online Submission

03/11/2018

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RE: DA2018/1667 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100

DA 2018/1667 181 ALLAMBIE ROAD, ALLAMBIE HEIGHTS NSW 2100

Please do not allow this development to proceed.

The subject site is an environmentally sensitive area that is not suitable for the proposed seniors living development. In addition it is a significant bush fire risk for less mobile elderly people.

My objections to the proposal include:

1. Significant Bushfire Risk

Should the new residents be put at so much bushfire risk?

The proposed development is on Bush Fire Prone Land and is also subject to a SFPP as a Retirement village. In addition, the location of the Class 10 building "does not comply with provisions of section 79BA of the Planning for Bush Fire Protection."

What exceptional circumstances enable this to be compliant???? "However this buildings fabric, design, fire protection assets and its purpose provide exceptional circumstances for its approval by the relevant consent authorities."

Unusually the new site is being used as a buffer for existing buildings! Is this really justification to build this new development?

"Importantly the site is located between the fire threat and several existing Special Purpose Developments which were built prior to PBP and which consequently have no APZ or other PBP mandated Fire Management obligations. Managed APZ's and an Ecologically Sound Bushfire Management Plan upon the site will significantly reduce the fire threat to these vulnerable properties while protecting ecologically important features."

2. Infill development?

Please advise what "infill development" is and how this application complies? Is this a planning loophole?

"The proposal at 181 Allambie Road is contiguous with and managed concurrent to the Allambie Heights Village Residential Aged Care Facility and the AHV Retirement Village and is governed by a 50 year lease and as such can be considered to be an extension of the AHV and the proposed development is, to all intents and purposes, an infill development and has been treated as such within this report. The proposed residential buildings are compliant with the requirements of PFBFP."

3. Creation of APZ zones into MWWMP.

The APZ would require the removal of vegetation and modification of bushland areas and the APZ will impact on bushland that is contiguous with existing bushland in MWWMP.

Please consider the recent impact to Manly Vale Public School. The development and the subsequent APZ has decimated the population of Eastern Pygmy Possums (and other fauna) at the school. This proposal is for further EPP population to be bought off with Offset Credits. How does this actually protect the EPP population?

"Of the three types of native plant communities identified on the whole subject site, only two (2) would be subject to clearing along the development boundary. The very small area to be cleared (.03ha) approximately results in the minimum offset credit requirement of one (1) credit for each of these communities. The small size of the cleared area was insufficient to trigger any credit requirements for threatened fauna species even though a range of predicted "ecosystem credit species" were assumed to be present and one (1) "species credit species" - The Eastern Pygmy Possum was identified."

The development would impact on the habitat of native fauna, including threatened species.

4. Riparian Lands

From the report: "A large part of the site has been mapped as riparian lands by Council. Part E 8 Waterways and Riparian Lands. Part E 8 lands prescriptively must not have Asset Protection Zones located on them. A very large section of the site is E8 mapped lands.

Northern Beaches Council has made a concession at a pre-Development Application meeting that the extent of the mapped waterway be reduced by the exclusion of a man made drain. 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.

I disagree with concessions being made due to degradation reasons. Surely this then provides the "Trojan Horse" for the ongoing development of the MWWMP." The depleted native plant community and weed infestations could be managed through bush regeneration rather than development.

5. Notification Map - Limited.

It is disappointing that the Council requirement allows for such limited notification - which includes a huge amount of empty bushland and 3 other retirement villages. (see Notification Map documentation).

6. Curl Curl Creek and Manly Dam impacts:

A large part of the development would be located on land identified as a riparian buffer within Curl Curl Creek. The development site is located at the headwaters of Curl Curl Creek, which flows through Manly Warringah War Memorial Park to Manly Dam.

"Existing detention basin will be upgraded with council permission." The existing detention basin is in MWWMP and should not be required to be upgraded for the purpose of increased development.

The development would impact on the natural waterway downstream in Manly Warringah War Memorial Park that supports riparian vegetation and aquatic habitat.

Two first order tributary creeks flow through the site via small culverts into the natural creek line immediately below the site.

7. Excavation impacts:

The extensive excavation would intercept subsurface flow and result in irreversible changes to

the natural hydrology of the site. The excavation for building and underground tanks would remove sandstone substratum and alter the natural topography of the site.

8. Use of remnant Crown Land

The development would be located on Crown land that was reserved for public and semi-public use.

The community has been striving for many years to conserve the Manly Dam Catchment and it's sensitive bushland surrounds.

Could these areas of remnant Crown land adjoining the park not be given suitable E2 zoning and conservation status?

9. Removal of trees for development

85 out of 107 trees assessed are recommended for removal.

"In summary, one hundred and seven (107) trees were assessed for this development and 85 trees were recommended for removal as they are either:

- within or immediately adjacent to the construction footprint and unable to be retained due to impacts from construction, installation of services, bulk earthworks and regrading; OR,
- are considered weeds or in poor, or very poor, condition and unsuitable to be retained in the context of the development."

10. 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 do NOT approve this development.