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01/04/2021

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Select...  
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**RE: REV2021/0006 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100**

I object to REV2021/0006 at 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100, and request that Council reject the application.

The reasons include, but are not limited to the following.

1. Constructing seniors accommodation in a bushfire risk zone contradicts the advice given by the RFS in PBFP 2019. There are very good reasons for this recommendation by the RFS and it seems negligent to condone increasing the risk to vulnerable older people.
2. The DA originally was NOT supported by the Water Management Referral Response nor the Engineering Referral Response due to deficiencies with the proposal.
3. The conditional support by the Natural Environment Referral Response - Riparian is flawed. An extract reads...  
"Note that the riparian is still within the APZ zone and the proposal is not fully satisfying the Council's DCP and Protection of Waterway and Riparian Lands Policy, however the water quality treatment chain (bioretention and pond) and the proposed vegetation regeneration MIGHT mitigate the impact of the APZ zone. It is RECOMMENDED that the planting list is amended by an ecologist for (1) the bioretention to maintain a functional system (2) regeneration mix with native species/ local provenance." (my emphases)  
  
"Might mitigate" is not good enough and indicates the likelihood that the riparian zone WILL be compromised by the APZ. If that happens (as is likely) then the damage is done. Similarly, "recommended" is an insufficient guarantee - at the very least it should be "mandatory". Finally - it is by no means certain that you can effectively revegetate in a way that maintains the competing requirements of a healthy, functioning riparian zone and an APZ that needs regular clearing.
3. Low-cost seniors' living is needed in the NBC area, however this development is advertising luxury apartments. It is not appropriate to alienate multiple use Crown land for luxury apartments not available to the broader public.
4. Good planning should take into consideration the current context. Manly Warringah War Memorial Park is a special reserve that commemorates in its entirety the sacrifices of our war service men and women. Protecting the very high ecological value of MWWMP honours these people, while preserving our wonderful natural heritage.

5. Recent surveys have located the climbing galaxias in the stream adjacent to this proposed development. The research shows that it is likely this is the last remaining population within MWWMP. Development will inevitably lead to degradation of the stream environment - if not during construction then certainly over time. The local extinction of yet another species must be avoided at all costs.

Over the years, Manly Dam has been subject to death by a thousand cuts , including Golf Course over-development, the Ardel debacle and the on-going environmental damage caused by the Manly Vale Public School rebuild. The widening of Wakehurst Parkway, the construction of a tunnel and the possibility of a High School being relocated on top of a toxic landfill at the creek's headwaters also remain very real threats to MWWMP. The integrity of the Park has been allowed to deteriorate by inappropriate development. Any more development with negative ecological consequences should not be allowed - this DA poses such a risk.

I would also like to comment that I find the DA process in this instance to unfairly favour the applicant. Such DAs get knocked-back for good reasons yet, after a little tweaking at the margins, they rise again from the dead. The community is not properly notified when DAs are re-submitted and, unless you obsessively check, eventually the DA sneaks through unnoticed and unresponded to. It seems that approval is achieved by stealth and attrition - hardly fair and not in the greater public interest.

On balance, the benefits of this DA are outweighed by the permanent negative impacts on MWWMP. I strongly urge Northern Beaches Council to reject REV2021/0006.