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Subject: Online Submission

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RE: DA2020/0552 - 181 Allambie Road ALLAMBIE HEIGHTS NSW 2100

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I strongly object to DA 2020/0552 181 ALLAMBIE RD for the reasons outlined below:-

1. FLORA and FAUNA

The site contains bushland that is contiguous with the Manly Warringah War Memorial Park. All bushland within the site will be managed to maintain fire fuel levels at less than 10t/ha. (meaning it will be culled significantly).

The removal of vegetation will mean the loss and modification of habitat and connectivity. The development will remove about 6.8 (6,800 m²) of native vegetation on and adjoining the site. A total area of approximately 0.56ha (5,600m²) of native vegetation will be cleared.

The Outer Protection Area (OPA) requires an additional clearing of approximately 0.12ha (1,200m²) of bushland in moderate and good condition.

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

The development will result in the loss of potential foraging habitat for threatened fauna species. "Eight threatened fauna species were observed using the site during the current and previous on-site surveys."

The proponent's own biodiversity assessments identified eight threatened species at the subject site...even more than the initial application ... which confirms the rich biodiversity of this area.

Eastern Pygmy Possum, Large eared Pied Bat, Square Tailed Kite, Grey Headed Flying Fox, Powerful Owl, Large Bent Winged Bat, Red Crowned Toadlet, Little Bent Winged Bat.

The development will result in the loss of potential breeding habitat for threatened species. The grass swale habitat for the Red-crowned Toadlet will be entirely removed as a result of the proposal.

To try and compensate for the impact of threatened species the D.A outlines the intention of purchasing Bio-banking credits. This acknowledges that they realise there will be a loss, however I maintain that this system is significantly flawed.

2. INDIRECT IMPACTS

The development would reduce the viability of adjacent habitat for native fauna due to noise and artificial light spill.

The intensity of use associated with the 24 apartments (with 2-3 bedrooms) would have indirect impacts on bushland areas in and adjoining the Manly Warringah War Memorial Park.

The direct and indirect impacts are not compatible with conservation values of Curl Curl Creek Catchment and Manly Warringah War Memorial Park.

3. LOSS of TREES

Of the existing 107 trees within the relatively cleared area of the site, 85 are proposed to be removed.

4. CATCHMENT SENSITIVITY

Curl Curl Creek catchment has very high ecological value and less than 10% connected impervious area. The sensitivity of Curl Curl Creek catchment means that even small land use changes could substantially affect aquatic ecosystems.

Curl Curl Creek, the main feeder creek to Manly Dam and Manly Lagoon (for which the subject site is a watershed) is home to the only population of Climbing Galaxias fish in Sydney. This is a Gondwanan relic- thought to have survived in this creek for 60 million years. It climbs up sheer rocks using its fins and breathes through its skin, but its continued existence depends on clean unsullied freshwater.

The lake into which this creek drains (Manly Dam) is the last place in Sydney where humans can still swim in unpolluted fresh water.

5. HERITAGE CONSERVATION AREA AND WAR MEMORIAL PARK

The site is adjacent to land identified as a Heritage Conservation Area in Manly Warringah War Memorial Park.

Clearing on the edge of the park creates a much larger impact than the sum total of flora removed because it takes away an important vegetative buffer creating cumulative land degradation. The park will be left vulnerable to edge effects due to the removal of shrub and canopy layers within the adjacent APZ.

6. RIPARIAN LAND

The majority of the area proposed for development is mapped as 'Waterways and Riparian Lands' (Warringah DCP 2011) based on the Riparian Buffer around Curl Curl Creek (Warringah Creek Management Study 2004).

The Protection of Waterways and Riparian Lands Policy states that: "Development within waterways and riparian land should be avoided".

7. CROWN LAND & ZONING ISSUES

This Crown Land parcel is not zoned for medium density so how could an additional 24 units possibly be approved here. Apartment buildings are not listed as a permitted use in the low density R2 zone. (WLEP2011)

This current proposal by Allambie Heights Village is for over 55s "Luxury" units which seems to be totally contrary to the spirit of the original lease and at odds with the provisions of the Local Environment Plan.

8. BUSHFIRE PRONE LAND

The proposed development is on Bush Fire Prone Land, which is not suitable for seniors

housing. The Rural Fires Act (Planning for Bush Fire Protection 2006) specifically discourages locating Special Fire Purpose Developments within bush fire prone land.