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**Sent:** 20/10/2020 3:18:49 PM  
**Subject:** DA 2020/0393 - submission/comments

Hi,

Apologies for the lateness of the submission. I missed the development when it was on exhibition. While the development overall is considered a suitable use of the land, it is fundamentally deficient in its approach to assessment and mitigating impacts to local biodiversity. With this in mind, could Council give consideration to the following if these have not been addressed separately during the assessment phase.

- The SEE is deficient and non-compliant with the EP and A regulations, as it provides no assessment of the impact of development in relation to the loss of native vegetation nor the impact on native fauna species. The SEE has not addressed Schedule 1 2 (4) of the Environmental Planning and Assessment Regulation 2000 to the required extent.
- The site currently provides ecosystem services for a vast array of native bird species and the impact of the loss of this habitat has not been considered nor addressed.
- Many of the tree species on the site provide habitat and resources for nectar feeding birds and arboreal fauna. This will be lost. The loss of this local native habitat will favour invasive bird species such as the Indian Myrna. The development will also favour invasive bird species by way of the scrap food typically associated with similar urban developments. The local area currently has a limited problem with Indian Myrna species due to the retention of existing native vegetation and the availability of resources that support native species. The re-establishment of native vegetation should be mandated for this development to prevent further invasion by the Indian Myrna species.
- The proposed landscaping strategy does not appear to consider the replacement nor offset of the loss of this local habitat.
- The proposed landscaping strategy is considered lazy and the species selected generally do not integrate with the surrounding native vegetation. For example species such as Agave, Frangipani, Star Jasmin, Yucca, bamboo, are poorly aligned with local native vegetation communities and generally out of character with the species in the area. The landscaping strategy requires substantial rework to be considered appropriate for the a development of this nature and location.

Thanks,

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