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17/04/2019

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**RE: DA2019/0200 - 130 Old Pittwater Road BROOKVALE NSW 2100**

I wish to object to this DA based upon the potential environmental impacts detailed below.

**REQUIREMENT FOR FURTHER STUDIES:**

There is evidence that further studies i.e. a Species Impact Statement is warranted for this DA. The SIS should potentially include (but not be limited to) the following fauna species, pending the appropriate survey and reporting efforts:

1. Glossy Black Cockatoo (*Calyptorhynchus lathami*) - Site supports critical feeding habitat and potential nesting habitat. Recent recordings in adjoining bushland, at Manly Dam (2018).
2. Red-Crowned Toadlet (*Pseudophryne australis*) - Site supports foraging, shelter and breeding habitat. Prior recordings made on the site.
3. Powerful Owl (*Ninox strenua*) - Site supports nesting and roosting habitat. Recordings made in adjoining bushland.
4. Rosenberg's Goanna (*Varanus rosenbergi*) - Site supports habitat. Recordings made in Allenby Park area.
5. Giant Burrowing Frog (*Heleioporus australiacus*) - Site supports habitat. Recordings made in area.

**FLORA AND FAUNA ASSESSMENT- GENERAL COMMENTS:**

1. Conclusions made in Flora and Fauna Assessment (FFA) in regards to fauna species rely heavily on a majority studies conducted 10 years ago (pg. 27-28 FFA). Majority of studies relied upon were from 2009.
2. No targeted species searches were undertaken.
3. Recent survey efforts were limited to a single diurnal study undertaken in 2018, in unfavourable weather conditions.
4. No nocturnal surveys recently undertaken.
5. Diurnal, visual amphibian search only. No call back survey.
6. No recent hair tube, trapping, camera monitoring undertaken recently within the subject area.
7. As noted in the FFA, weather conditions were not suitable for bird activity and surveying.
8. Noted weather conditions for the single diurnal study were also not suitable for reptile surveys.
9. Survey effort was limited for reptiles and did not include searches within leaf litter, trapping or camera monitoring for species such as Rosenberg's Goanna.
10. No results from the scat and pellet search and examination published in the FFA.
11. No recent Anabat survey efforts.
12. No BioNet Atlas search for Giant Burrowing Frog included in the FFA. A BioNet Atlas search shows this species recorded in area (Beacon Hill 1994). More recent recording (2017)

made in Oxford Falls.

13. No BioNet Atlas search published for Red-Crowned Toadlet. A BioNet Atlas shows this species recorded in Allenby Park (most recently in 2013).

14. Records of Rosenberg's Goanna are missing from Figure 11 - there are two recordings from 2012 and 2017 on the BioNet Atlas search for Rosenberg's Goanna. These were made in the vicinity of Allenby Park and are not included on Figure 11 (pg.35 FFA)

15. The Flora and Fauna Assessment notes this redevelopment is in conjunction with adjoining development, by the same owner/applicant. Cumulative impacts have not been addressed.

16. Competition for resources as noted in study highlights the importance of conserving fauna habitat.

17. The arborist report states: The development proposal is expected to have moderate to high impact on the contribution of trees to local amenity or character. This sentiment is not reflected in FFA.

18. Edge effects are not considered, such as potential light and noise pollution, increased predation, increased introduced flora and fauna species etc.

19. Total number of trees to be removed (including species) not listed and mapped.

20. No vegetation mapping in the FFA.

21. Allenby Park Plan of Management not cited as a resource for the FFA.

22. Construction zone not delineated and accounted for in the FFA.

23. The scats of cat recorded 10 years ago used to suggest a lack of terrestrial fauna in lieu of recent survey efforts.

## FLORA AND FAUNA ASSESSMENT - SPECIES SPECIFIC COMMENTS:

Glossy Black Cockatoo (*Calyptorhynchus lathamii*)

1. GBC recorded twice in 2018, in adjoining Manly Warringah War Memorial Park  
<https://youtu.be/CfNTkhfDo6U>

2. Site supports critical feeding habitat for GBC.

3. GBC almost exclusively feed on Forest She-oak (*Allocasuarina torulosa*).

4. Total proposed removal of Forest She-oak is not delineated in the FFA. Pg. 34 of the FFA notes 6 female She-oaks. Pg. 61 describes the female She-oaks present as 'a few'.

5. Female She-oaks are prolific seed bearers, especially older trees which provide abundant feed for the GBC.

6. Each individual non-breeding GBC will feed on over 500 she-oak cones a day, this highlights how critical the habitat on the subject site is. It is important that all She-oaks in an area or stand are maintained for foraging opportunities.

7. She-oak is especially susceptible to fire, ongoing planned hazard reduction burns in the area should be considered.

8. Ongoing HRD burns in area lead to temporary and/or permanent loss of feed species for GBC.

9. On the Northern Beaches, the forest oak community is only found at Allenby Park and is noted is a major food source for the GBC.

10. Regardless of the current male to female ratio of plants, this site presents ongoing habitat for this critical feed species for GBC and a long term secure food source required for the survival of the threatened GBC.

11. Various age cohorts of the Forest She-oak on the subject site, documented allelopathy by this species and infrequent fire in the subject area present secure feeding habitat for the GBC on site.

12. Presence of Smooth Barked Apple (*Angophora costata*) as a main canopy tree on site presents a potential nest site for GBC in future, if left to mature. Smooth Bark Apple is a known

hollow producer.

13. Retention of hollow producing trees is important for continued breeding success of this species.

14. Site supports critical feeding habitat and potential nesting habitat. The loss of the habitat may be considered as having a significant impact on this species under the Threatened Species Conservation Act.

15. Further studies and reporting i.e. a SIS is warranted for this species.

Powerful Owl (*Ninox strenua*):

1. No nocturnal studies, including targeted studies with call backs undertaken for this species.

2. The site has been incorrectly identified as 'occasional foraging habitat only' (pg 62 of Flora and Fauna Assessment).

3. The FFA incorrectly states that Powerful Owl require tree hollows for roosting (pg. 62 of the FFA). Powerful Owl commonly roost on tree branches.

4. The site supports optimal roosting and nesting habitat for the Powerful Owl.

5. Vegetation class (Coastal Sandstone Gully Forest), the drainage line on site and main canopy tree present (Smooth Barked Apple) all present optimal roosting and nesting habitat for the Powerful Owl.

6. FFA appears to misrepresent BioNet Atlas data for this species. FFA notes an abundance of records on the BioNet Atlas, however noting the grid-like distribution, this species appears to be 'blanket mapped' over certain areas. Powerful Owl Project records may give a more accurate representation.

7. FFA misrepresents habitat needs for main food source of Powerful Owl, Ringtail Possum. Ringtail Possum commonly build dreys (nests). Tree hollows do not need to be present on the site in order for this prey species to be present.

8. Directly adjoining bushland reserve (Allenby Park) supports Powerful Owl main food source, Ringtail Possum. Further food source Grey-Headed Flying Fox (*Pteropus poliocephalus*) recorded in Allenby Park and wider area.

9. Presence of Smooth Barked Apple (*Angophora costata*) as a main canopy tree on site presents a potential nest site for GBC in future, if left to mature. Smooth Barked Apple is a known hollow producer.

10. Main canopy tree on the subject site, Smooth Barked Apple is noted as a significantly important tree for Powerful Owl for both roosting and nesting.

11. The loss of roosting and nesting habitat in the area may be considered as having a significant impact on this species under the Threatened Species Conservation Act.

12. Further studies and reporting i.e. a SIS is warranted for this species.

Red-Crowned Toadlet (*Pseudophryne australis*):

1. Red-Crowned Toadlet twice recorded on site, in 2003 and 2009 (pg. 34 FFA). RCT also present in adjoining bushland.

2. RCT habitat requirements are incorrectly portrayed in Flora and Fauna Assessment (pg. 60 FFA).

3. It is stated in the FFA that the site does not contain a 'wet drainage line' (pg. 60 FFA). A wet drainage line is not a prerequisite for the species breeding cycle. The site contains a periodically wet drainage line, supporting the breeding habits of RCT.

4. It is stated that there is no 'permanently damp leaf litter suitable' for RCT on the subject site. Permanently damp leaf litter is not a prerequisite for the species breeding cycle. The site contains periodically damp leaf litter, supporting the requirement for the species breeding cycle.

5. Vast She-oak cladode ground litter on the subject site provides optimal habitat for RCT shelter and breeding. Especially when present around temporary drainage lines as on the subject site.

6. RCT previously recorded in upper portion of site. Breeding cycle describes this species lays eggs in upper portion of ephemeral streams, which are washed into lower areas where tadpoles form. The subject site forms the complete habit for breeding regime of RCT.
7. There was no targeted search for RCT Toadlet, a nocturnal study should be done after heavy rain and/or a thunderstorm with call back.
8. Subject site supports full lifecycle for the species i.e. foraging, shelter and breeding habitat. The loss of this habitat may be considered as having a significant impact on this species under the Threatened Species Conservation Act.
9. Further studies and reporting i.e. a SIS is warranted for this species.

#### Rosenberg's Goanna (*Varanus rosenbergi*)

1. Rosenberg's Goanna is considered a cryptic species due to its large range.
2. There was no targeted search for species, such as motion camera monitoring.
3. Site supports habitat for this species.
4. RG Found in heath, open forest and woodland.
5. Individuals require large areas of habitat.
6. Species is associated with vegetation class described on the subject site.
7. Site supports faunal corridor for this species, with linkages to suitable habitat at Manly Dam.
13. Loss of habitat may be considered as having a significant impact on this species under the Threatened Species Conservation Act.
14. Further studies and reporting i.e. a SIS is warranted for this species.

#### Giant Burrowing Frog (*Heleioporus australiacus*):

1. Giant Burrowing Frog considered a cryptic species.
2. Spends more than 95% of its time in non-breeding habitat in areas up to 300 m from breeding sites
3. Found in heath, woodland and open dry sclerophyll forest.
4. Whilst in non-breeding habitat it burrows below the soil surface or in the leaf litter. Individual frogs occupy a series of burrow sites, some of which are used repeatedly.
5. Eggs and are laid in burrows or under vegetation in small pools. After rains, tadpoles are washed into larger pools where they complete their development in ponds or ponded areas of the creekline.
6. Breeding habitat of this species is generally soaks or pools within first or second order streams. They are also commonly recorded from 'hanging swamp' seepage lines and where small pools form from the collected water.
7. No targeted surveys including call back undertaken for this species.
15. Subject site supports habitat for this species. Loss of habitat may be considered as having a significant impact on this species under the Threatened Species Conservation Act.
16. Further studies and reporting i.e. a SIS is warranted for this species.

#### GENERAL COMMENTS:

1. The Allenby Park Plan of Management notes that the Forest Oak Forest that appears to be present on site is of regional significance (pg. 7, Allenby Park POM).
2. Forest She-oak Forest community poorly represented in Ku-ring-Gai and Garigal NP (pg. 29 Allenby Park POM).
3. Land acquisition should be considered by Council, this option is supported by the Allenby Park POM, the fauna corridor values, existence of regionally significant vegetation and threatened species habitat.

4. Encroachment into the fauna corridor and the endorsement of diminished environmental values of the adjoining Allenby Park may set an unfavourable precedent for further development on the escarpment.
5. Significance of this of fauna corridor has been elevated after hospital development in Frenchs Forest.
6. Value of the fauna corridor noted in the Allenby Park POM. "Opportunities for faunal corridors and genetic exchange are now highly fragmented and restricted by urban development (a potential contiguous linkage with Manly Dam offers significant opportunities)." (Pg. 26 POM)
7. The subject site forms part of a significantly important wildlife corridor, allowing for genetic exchange and survival of species.
8. Due to its position, the subject site may be an important refuge for fauna during bushfire events in Allenby Park.
9. The value of corridor recognised by Council. Protections sought as a Management Action in the Allenby Park POM.
10. The Allenby Park POM lists the following Management Action as 'High Ongoing': (Item A4) "Investigate future options for consolidation of contiguous remnant bushland and protection of faunal corridors along the western portions of privately owned land between Allenby Park Parade and Old Pittwater Rd."
11. The Allenby Park POM seeks to protect the parks values through this action listed above. This DA conflicts with this action.
12. The Allenby Park POM seeks to enhance faunal corridor and linkage to Manly Dam through indigenous street plantings in Allambie Heights. This DA conflicts with this action. (Item D4).
13. The Allenby Park POM notes the significant encroachment and isolation of the park. Further isolation and encroachment should not be supported.

Resources:

BioNet Atlas: <http://www.bionet.nsw.gov.au/>

Allenby Park Plan of Management:

<https://files.northernbeaches.nsw.gov.au/sites/default/files/test-gab/appofm-gab.pdf>

OEH Threatened Species Profiles: <https://www.environment.nsw.gov.au/>

Northern Beaches Council Website:

(<https://www.northernbeaches.nsw.gov.au/environment/native-flora/sydney-sandstone-gully-forest>).

Hornsby Council Website:

[https://www.hornsby.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0010/104041/HSC3865-Angophora-costata.pdf](https://www.hornsby.nsw.gov.au/__data/assets/pdf_file/0010/104041/HSC3865-Angophora-costata.pdf)

Birdlife: <http://birdlife.org.au/documents/POW-PowerfulOwl-nest-roosttree-species.pdf>