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Subject: Online Submission

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

I am opposed to the proposed development due mainly to environmental reasons.

1. 85 trees are proposed to be removed. Many of these are important food trees for wildlife. The proposal will remove mature flowering gums (*E robusta* and *E botryoides*) in good health. These provide important food for our Grey-headed Flying foxes. Stating the trees will be replaced and improve the site is clearly inaccurate. No services will be replaced for at least 30 years - including erosion control, food provision, habitat. And that is even if the plantings survive - in a warming and drying environment new plantings are struggling to survive and many become pest / disease ridden and die. Developers never follow up and replant any failures. Mature healthy trees should not be removed. They have become especially important since the bushfires last season and the food shortages the drought has caused over the past few years. Flying Foxes are especially vulnerable to loss of flowering gums and have been identified as under severe threat. GHFF are listed as vulnerable and are also on the Priority Species List of the Bushfire Recovery Expert Panel. Also note that any species at all (even more common species like brushtail possums) that rely on these trees as food and habitat will die now (they have territories) and cannot wait for 30 years before next plantings are useable.

2. All endemic species of flora should be retained. Any other plantings would be most welcome of course, but plantings should be as a complement to current mature trees and as part of a succession plan over the next 20-30 years.

3. It is objectionable that the developer states the plan would improve the environmental health of the site. They could have been assisting in weed management earlier. It is developments in that area that have lead to escaped plantings and increased weeds in the catchment

4. Removal of plantings for APZ severely impacts on buffer zones to protect Manly Dam. The approval by RFS is only assessing impact on buildings. They do not comment on removal of vegetation and adverse impact on wildlife.

5. Although there is precedent of building "over-55 housing" in this region, this has lead to poor social and environmental outcomes - difficulty of access should there be a bushfire, increased weed incursion, increased presence of pets in the Manly Dam area that attack wildlife. Council should be setting a new precedent about retaining mature trees

6. Erosion and runoff into the creek headwaters is likely to increase. Removal of vegetation always leads to increased erosion. As the example of upgrading MV public school showed, the measures in place during the development were totally inadequate and not maintained, leading to very heavy sediment loads being washed into the waterways during rain events. And as the bushfire scenario showed, the loss of vegetation meant that ash and soil and other debris washed into waterways and killed aquatic fauna that had survived the fire. A number of species of galaxias fish and freshwater crayfish have now been placed on priority species list of the Bushfire Recovery Expert Panel

7. The plans talk about excavation for parking, but I cannot find any details on impacts on groundwater. As this is sandstone substrate, both water flow and erosion are likely. Therefore adverse impacts on curl curl creek headwaters are likely.

I can see that the plans for most northerly set of units may be suitable, but the community building and the second residential building near the current access road are not suitable at all for this area as impact on wildlife and the adjoining Manly Dam reserve are highly damaging.