From:

Friday, 10 November 2023 11:39 AM

To:

Subject:lizard rock submissionAttachments:submission.docx

PP-2022-3802

Hi I believe that you are accepting submissions through this email address.

Please could you confirm that the attached objection will go through for proper consideration? It is a very important matter to me.

Thank you,

## Dear Sir/Madam

I am writing to oppose the proposed rezoning of land at Patyegarang, Morgan Road, Belrose, or "Lizard Rock" (PP-2022-3802). I live in the Hunter Valley but grew up on the Northern Beaches, still visiting family regularly and am passionate about preserving the biodiversity there. It is some of the most beautiful vegetation in the world and is of global significance.

It is unique. Lizard Rock bushland is part of the Sydney Basin Sandstone vegetation community, but it also has its own unique fingerprint based on specific geology, history and microclimate. These local influences result in small variations in the genetic make-up of species as well as locally specific vegetation assemblages. Standing at the sandy entrance of this pristine bushland I see subtle differences to other areas. The spider grevilleas here appear slightly paler than those in Garigal national park, and the combination of plant species – their height, texture, density, colour showcases the unique Belrose expression of Sydney Sandstone vegetation. These patches of urban bushland are critical reservoirs of genetic diversity, it is this factor alone which will allow species to adapt and evolve to a rapidly changing world. The loss of genetic diversity is rarely weighed in development reviews, but it is of utmost important here because Northern Beaches bushland is disappearing rapidly.

This decline in the extent and health of Northern Beaches bushland threatens the **ecological function** across the local landscape. There is no doubt that biodiversity has crashed here and we have lost iconic species like koalas and squirrel gliders but also insect diversity, and small birds, the pollinators and seed carriers – the dawn chorus is now a monotone of noisy miners and the occasional lorikeet. This takes something from our humanity. It is so important that we live with nature, and retain these critical patches within the urban matrix. Lizard Rock bush is chock-full of the tiny creatures that undertake the ecosystem services that give us life.

The bushland of the northern beaches also influences the **status of our national parks** which can only be as healthy as the landscape they are within. If they are surrounded by a hard urban boundary then edge effects and loss of landscape processes will degrade them. The position of Lizard Rock as a bushland corridor makes it critical in this aspect. It's in everyone's interests to keep Kuringai and Garigal national Parks healthy.

I take issue with the claim in the application that 10% of the area will be preserved as bushland. Although the document references the risk of indirect and uncertain impacts from the development, I say that these impacts are certain. **Urban edge effects** alone are well known to affect the entirety of small patches of bushland. Worse than that, previous local developments have led to the severe degradation of any offset areas. Consider the Supercentre at Belrose, NSW, 4-6 Niangala Close which was constructed on the fringes of critically endangered Duffys forest vegetation. The remaining 'preserved' patch has now deteriorated significantly and become overrun with weeds. Moreover, a substantial area has been legally under scrubbed as part of an asset protection zone. Very little biodiversity remains.

My greatest fear is the precedent that this development will set for the further development of local bushland which will truly spell the end for any hope that future generations of children will be able to play in the bush, breathe it's dust, imprint their childhood with the sound of a scrub wren or whip bird.

Lastly, I think that it is dreadful that Aboriginal councils are compelled to sell their beloved land for financial gain. This should not be an 'either/or' situation. This land is sacred and connects us all, the true value of the land is beyond short term currency.

I believe we will be in breach of the intent of biodiversity protection laws at international and national levels by planning such generational harm to the local natural environment.

I am a local resident on the Northern Beaches and I write on behalf of those who cannot write a submission for themselves – the wildlife that live at Lizard Rock, and the future generations who have a right to a healthy natural environment.

This proposal must be refused for the following reasons:

- Loss of habitat for iconic species of flora and fauna such as swamp wallabies. This bushland forms part of a wildlife corridor connecting private land, Garigal National Park, and Narrabeen Lagoon State Park. This area has high biodiversity value and is irreplaceable.
- Impacts on the Narrabeen Lagoon Catchment as stormwater from the development will flow down hill, with less bushland to filter the water before it enters the estuary. This will impact on threatened species including the red-crowned toadlet and spotted-tail quoll and on marine animals that live in the lagoon.
- Loss of Sydney's Green lungs as trees are renown for their ability to improve air quality, help to cool urban areas, and draw down carbon from the atmosphere into the ground. With the threat of climate change, every tree plays an important role in drawing down carbon, and helping to mitigate urban heat impacts.
- Some of the sites are at significant risk of bushfire events. This would mean we are building houses in places we know that people may not be safe in the future. Northern Beaches Council has obtained independent advice on bushfire risks at the Lizard Rock site, which identified that the site includes areas of Very High Extreme risk. The report also identified concerns about the safety and viability of evacuation. This proposal will likely require significant asset protection zones, which would further erode the wildlife corridor.
- Traffic and urban sprawl this proposal will create problems with urban sprawl, as more houses are built away from urban centres, and so the residents will be reliant on cars, rather than being within a short walk or bus ride to places. This will contribute towards local traffic congestion on Forest Way, Wakehurst Parkway, and Warringah Road.
- Broader Strategic planning implications the proposed housing is happening in isolation to the broader strategic planning being done by Northern Beaches Council to meet housing needs and plan for issues such as traffic and services in a holistic way across the entire Northern Beaches.
- **Negative precedent in the deferred lands** The Northern Beaches Council is undertaking a strategic review of land use in the Metropolitan Rural Area in Oxford Falls and Belrose. Using an evidence based approach, the Council's draft plans are to zone private land in this area as Rural and C3 Environmental Management zoning. Approving the planning proposal

would create an inappropriate precedent that other landowners in the MRA can also seek a spot rezoning, further eroding the remaining bushland on private land.
Thank you for your consideration
Sincerely,
Name:
Signed:
Email:

From:

Sent: Tuesday, 21 November 2023 11:04 AM

To:

**Subject:** FW: Lizard Rock Submission - PP-2002-3802 **Attachments:** submission\_lizard rock submission.pdf

From:

Sent: Tuesday, 21 November 2023 10:25 AM

To:

**Subject:** Lizard Rock Submission - PP-2002-3802

Hello

I've just become aware that my submission may not have been registered through your portal properly.

Resending just incase.

Please confirm receipt and acceptance.



## Dear Sir/Madam

I am a local resident on the Northern Beaches and am writing to oppose the proposed rezoning of land at Patyegarang, Morgan Road, Belrose, or "Lizard Rock" (PP-2022-3802).

That policy position represents nearly every person I spoke to on the Northern Beaches, including constituents that support more housing on the Northern Beaches but oppose this development because it is completely inconsistent with the planning scheme.

I stand with the rest of the Northern Beaches Community in opposing this development for the following reasons.

- The planned proposal is inconsistent with the Greater Sydney Region Plan, North District Plan, Northern Beaches Local Strategic Planning Statement – Towards 2040 and Northern Beaches Local Housing Strategy.
- The land is Conservation Zoning because it is high quality bushland housing endangered animals and wallabies. This is the appropriate zoning that should remain.
- There is no justification to change the zoning and allow for the destruction of bushland. There are many alternative development opportunities to meet housing targets within the existing urban footprint.
- To approve this proposal would not only lead to the destruction of 45 hectares of bushland but would set a precedent that could lead to further destruction and overdevelopment.
- There remains part of Ingleside and Scotland Island with limited infrastructure and essential services that should be addressed before new greenfield developments are considered.
- The Patyegarang site will put undue pressure on infrastructure and is inconsistent
  with planning. Schools are already oversubscribed, public transport poor, Warringah
  Road is the third most congested road in NSW and there are no plans to improve this
  infrastructure or public transport.
- The area is subject to unacceptable bushfire risk, risking the lives of those who will live there.
- The area is subject to significant flooding to the Wakehurst Parkway which causes huge traffic issues with the Wakehurst Parkway (a main route to the Northern Beaches Hospital) closing completely in rain events. These types of infrastructure issues must be addressed before further developments are contemplated.

It should also be noted that in addition to the proposed development being inappropriate, there are significant concerns with the inconsistent and conflicting information in the applicant's documentation, undermining the strength of the application. Specifically, there is conflict between the independent fire safety report undertaken by the Northern Beaches Council which states 'severe bushfire risk' with the applicant's assessment and inconsistency regarding the provision of aged care services.

Good planning is required to meet the needs of Sydney. If this proposal went ahead it would be an appalling planning outcome that would cause such community outrage it would undermine confidence in the government's approach. It lacks any social licence and risks broader planning initiatives.

I, like others on the Northern Beaches, support aboriginal determination (Mackellar and Warringah voted 'yes' in the referendum) but this planning decision must be considered on merit and there is no merit in this proposal.

Yours sincerely,



Sent: To: Subject: Attachments:	Thursday, 9 November 2023 8:03 AM Lizard Rock pdf	
Dear		
Please find attached submission letter in relation to the above proposal.		
Regards,		

I was a local resident on the Northern Beaches for 17 years recently having moved to the Central Coast and I am writing to oppose the proposed rezoning of land at Patyegarang, Morgan Road, Belrose, or "Lizard Rock" (PP-2022-3802).

This proposal must be refused for the following reasons:

- Loss of habitat for iconic species of flora and fauna such as swamp wallabies. This
  bushland forms part of a wildlife corridor connecting private land, Garigal National Park, and
  Narrabeen Lagoon State Park. This area has high biodiversity value and is irreplaceable.
- Impacts on the Narrabeen Lagoon Catchment as stormwater from the development will flow down hill, with less bushland to filter the water before it enters the estuary. This will impact on threatened species including the red-crowned toadlet and spotted-tail quoll, and on marine animals that live in the lagoon.
- Loss of Sydney's Green lungs as trees are vital for their ability to improve air quality, help
  to cool urban areas, and draw down carbon from the atmosphere into the ground. With the
  threat of climate change, every tree plays an important role in drawing down carbon, and
  helping to mitigate urban heat impacts.
- Some of the sites are at significant risk of bushfire events. This would mean we are building houses in places we know that people may not be safe in the future. Northern Beaches Council has obtained independent advice on bushfire risks at the Lizard Rock site, which identified that the site includes areas of Very High Extreme risk. The report also identified concerns about the safety and viability of evacuation. This proposal will likely require significant asset protection zones, which would further erode the wildlife corridor.
- Traffic and urban sprawl this proposal will create problems with urban sprawl, as more houses are built away from urban centres, and so the residents will be reliant on cars, rather than being within a short walk or bus ride to places. This will contribute towards local traffic congestion on Forest Way, Wakehurst Parkway, and Warringah Road.
- Broader Strategic planning implications the proposed housing is happening in isolation to the broader strategic planning being done by Northern Beaches Council to meet housing needs and plan for issues such as traffic and services in a holistic way across the entire Northern Beaches.
- Negative precedent in the deferred lands The Northern Beaches Council is undertaking a strategic review of land use in the Metropolitan Rural Area in Oxford Falls and Belrose. Using an evidence based approach, the Council's draft plans are to zone private land in this area as Rural and C3 Environmental Management zoning. Approving the planning proposal would create an inappropriate precedent that other landowners in the MRA can also seek a spot rezoning, further eroding the remaining bushland on private land.





Many thanks for the call and conversation yesterday. As mentioned, I did not save a copy of my original submission in the portal, and as such I have attempted to re-write it below as close to my memory of that submission, albeit, that this is without a doubt a truncated version!

I'd like to open by making it very clear, that alongside the vast majority of the local community, I strongly oppose the development of the land at Lizard Rock/Patyegarang,

The core reasons for my opposition to the development is grounded around the key areas of:

- Safety (in multiple forms as explained below)
- Biodiversity impact
- Lack of suitable infrastructure

The amount of Bushland -whether virgin or reclaimed, continues to diminish in the Sydney basin, in parallel with Australia's horrific record on a global scale of bushland clearing. This, as has been clearly demonstrated, has led Australia to have the unenviable position of a global leader in biodiversity loss - particularly our mammal, and native species of fauna and flora as a whole. While the Lizard Rock site in and of itself may be relatively small in the larger battle to prevent loss of biodiversity, its, significance lies in its proximity to a population base, and if we as a people are to change the behaviours that lead to major biodiversity loss - anthropogenic climate change, habitat destruction, overexploitation, pollution and invasive species, we must protect the parcels of land closest to population centres to influence these behaviours in a positive manner.

While on the topic of biodiversity, it is an important opportunity to discuss the protection of sensitive Aboriginal land along with the sanctity of sensitive land claims. Many of us were present when just a few years ago when walking and riding trails had emerged in this very land, the MLALC put up clear signs highlighting the sensitivity and cultural importance of the land for our Aboriginal communities and the response was to accept and respect that. This is now the second parcel of land in the broader area where we have seen this behaviour, only to then develop it in the least culturally sensitive manner possible. Belief and respect of Aboriginal culture is being put at risk by the behaviour of the MLALC.

The most important topic, and the clearest area of objection to this proposal lies in the area of safety. Safety surrounding road traffic accidents (including pedestrians and cyclists), bushfire risk, and water quality and flooding. The access to and exits from this development onto either wakehurst parkway or Forest Way is already a safety risk with the low number of vehicles travelling on it at the moment. The number of near misses I have personally witnessed, particularly of cyclists and pedestrians using the area to either access schools, retirement villages or the bushland is large. Since my original portal submission, a very serious accident involving a young schoolchild highlights the risk of this, that is simply not worth taking.

Bushfires have devastated this area in the past, and with the clear communication to us as public of the increasing bushfire risk, combined with the limited exit areas, and the land where the development is proposed currently

acting as a bushfire "buffer zone", the risk of fire extending not only into the development but affecting other parts of the community is heightened.

We have in addition seen past examples (Engravings trail MLALAC development) that as a developer, MLALAC cannot be trusted to maintain environmental sensitivity, and the risk of water borne pollution is clear, and the flow that would occur from this development site would devastate a large and highly sensitive area.

Thank you for contacting me, and providing the opportunity to respond once again. Whilst this is a shorter response that does not include some of the original research based references of my original submission, I do hope that it captures key areas for you and with the support of the agencies submissions, will lead to a successful outcome for the community.

Many thanks



On Thu, Nov 30, 2023 at 3:52 PM DPE Metro Central and North Mailbox < wrote:

## Metro Central and North Planning and Land Use Strategy Department of Planning and Environment Service Strategy NSW GOVERNMENT

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through