



Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

Date: 16-Dec-2015

To: The General Manager
Blue Mountains City Council
Locked Bag 1005
Katoomba NSW 2780

By Email to: council@bmcc.nsw.gov.au

Subject: **Submission Opposing DA X/2224/2015, 60 Winnicoopa Rd Blaxland**

The Blue Mountains Conservation Society is a community based volunteer organisation with over 830 members. Its mission is to help conserve the natural environment of the Greater Blue Mountains, and to increase awareness of the natural environment in general.

I write on behalf of our Membership to support local residents in opposing the proposed development of 20 cluster houses at 60 Winnicoopa Rd Blaxland for the following major reasons:

- Unacceptable Bushfire risk for new dwellings and increase in risk for surrounding residents.
- Damage to existing native flora & fauna and landscape
- Stormwater management

Bushfire Risk

Existing risk from bushfire comes in part from the long, narrow and winding, single entry and exit roadway that is Winnicoopa Road and from the steep slope of the land. The additional 20 dwellings increase the potential number of vehicles and people needing to escape in the event of a wildfire. In addition, the proposed development brings the following specific threats:

- **Cluster Housing** could increase the likelihood of house-to-house ignition in this development, particularly from a fire coming up the slope.
- **Private Yards** could increase Bushfire ignition and fuel risk while decreasing accessibility for emergency services.
- **Only One Road in and out** could increase risk to human life (including firefighters) and to property in the event of a bushfire
- **Community Title** could threaten the effectiveness of compliance with Bush Fire Protection Measures (maintenance of APZ etc.).

Environmental Damage

A colony of *Lomandra brevis* has been reported on the proposed development site. Dr Trevor Hawkeswood states: "*Lomandra brevis* grows in dry sclerophyll forest and sclerophyll woodland on sandstone-derived soils in the Sydney region" (e.g. Carolin & Tindale, 1994). Robinson (1995) stated the species occurred in "moist open heathland", while Fairley & Moore (1995) noted that the species grows in "damp sandy areas or sheltered situations in dry open forest". The species is presently classified as **a rare or threatened Australian plant with a ROTAP rating of 2Rc** (reference <http://www.calodema.com/freefiles/339.pdf>). This species is little understood and seems to prefer areas around and under sandstone outcrops. Its range is limited to parts of the Sydney basin from the coast to lower Blue Mountains only (Fairley & Moore Native Plants of the Sydney Region, 2010). The proposed development would destroy - i.e. build a road over - approximately 50% of the plants in this area. This is clearly unacceptable.

There is a possibility that *Persoonia hirsuta* also exists at this site. While no specimens were noted on the site during the 2014 survey, they have been recorded previously - this does not mean there are none, or that they will not regenerate if the habitat in which they have previously been found is left undisturbed. The species is listed as endangered under the *Threatened Species Conservation Act 1995* (New South Wales) as well as under Commonwealth legislation (*Environment Protection and Biodiversity Conservation Act 1999* - Cth EPBC Act).

While no rare or threatened frog species have been noted to date, there is significant habitat in the proposed development area, including some currently ephemeral watercourses dependant on seasonal rainfall. An area we understand is a frog breeding area in relatively undisturbed native habitat, is designated to be sterilised (that is, native vegetation removed and sealed) to act as a stormwater sediment basin.

As well as the specific concerns raised above, the Society also has concerns in regard to adequacy and completeness of the flora and fauna impact assessment. A complete and comprehensive on-site flora and fauna assessment (including bats & birds surveys) should be carried out prior to the development being approved. Such surveys must also be carried out in various weather conditions, both diurnal and nocturnal and over appropriately-long periods of time to take in a number of seasons in order to have a reasonable chance of recording as many species and individuals as possible. Should such surveys produce more examples of endangered species, Council needs to apply appropriate development conditions or refuse the development.

We are also extremely concerned at the destruction of the natural landscape and bushland that is an inevitable consequence of the proposed development and its attendant large-scale works, including the removal of or damage to mature native trees in the 100s. The sandstone ridges and outcrops will be destroyed, or damaged at best; topsoil will be completely removed along with its seed bank, including seeds from rare and endangered plants, and replaced with exotic turf, likely sourced from outside the area and increasing the possibility of introducing exotic weeds.

Stormwater

Blue Mountains City Council is seen in the community, both in this LGA and elsewhere as a leader in efficient, economic and environmentally-sensitive stormwater management. Note the

accolades given to BMCC at the October Water-Sensitive Urban Design conference in Sydney, where Dr Alan Lane presented a case study on Popes Glen "Wasteland to Wetland" to showcase the benefits of community/Council co-operation and innovative design. Why then are development applications in water-sensitive areas - and this Winnicoopa Rd site is one - not required to take advantage of or learn from those in Council with the most up-to-date expertise; rather than adopting the same "easy" options, that in fact costs more and achieve less. We believe the DA does not adequately document the potential impacts from stormwater or provide adequate management of the negative stormwater impacts which will result from the development.

In particular, we refer to the sample "frog pond" mentioned in the Environmental Damage section. Without having seen the location, we would hazard a guess that this pond and associated watercourse could be designed to achieve a better outcome while leaving the natural structures intact, which is a more appropriate and sensitive approach.

There also appear to be issues with mapping of watercourses. We are very concerned that the development as detailed in the application will result in the delivery of massive silt and weed propagule plumes to the Fitzgerald Creek catchment. A local Bushcare Group has been actively working within the Fitzgerald Creek catchment to rehabilitate the area including weed removal in the bushland areas.

Conclusion

In addition to the major items listed, we ask Council to give weight to the amenity and social impact of the development for current residents and visitors.

We offer the examples outlined above as indicators of the inappropriateness of such a development on the site and in this instance we ask Council to reject the application.

Failing this preferred outcome, we request that Council rigorously monitor the compliance of any conditions of consent imposed on the development aimed at minimising environmental impacts including conditions aimed at minimising disturbance to the landscape, disruption to existing residents, current best-practice stormwater mitigation & management and improved bushfire safety.

Thank you for the opportunity to contribute to this process.



Tara Cameron
Senior Vice-President
Blue Mountains Conservation Society
bmcs@bluemountains.org.au