

AW/YFRS

Our Ref: KMG:640026

28 February 2017

Private & Confidential

Department of Planning and Environment Level 22, 320 Pitt Street SYDNEY NSW 2000

Dear Sir/Madam

Objection to Draft Structure Plan - The Ingleside Project

We act for owners of Lots was being numbers Walter Road, Ingleside respectively.

We submit this letter by way of objection to the draft Ingleside Precinct Structure Plan and in particular, to the mapped Environmental Conservation corridor along the western boundary of the above properties as shown in Figure 1.

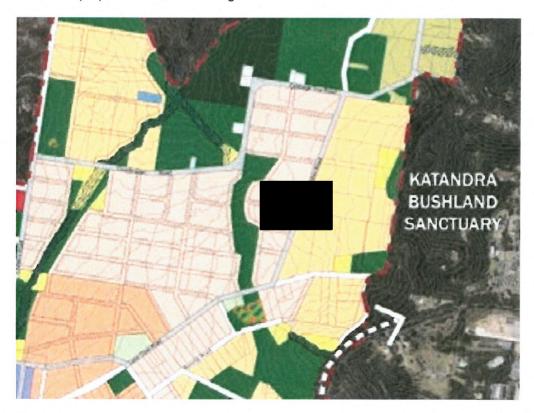


Figure 1.

Adelaide Alice Springs

Brisbane

Canberra

Darwin

Hobart

Melbourne

Norwest Perth

reitii

Sydney

We understand that the Structure Plan was informed by the draft technical studies, including the Draft Biodiversity Assessment Report prepared by Ecological Australia (**Biodiversity Report**).

Figure 32 in the Biodiversity Report maps ecological Corridor No. 5 as running along the western boundary of our clients' properties connecting the Kur-ring-gai Chase National Park to the north with the Katandra Bushland Sanctuary to the east.

Table 14 in the Biodiversity Report contains the following comment for Corridor No. 5:

'The Draft Structure proposes to deliver an additional ecological corridor connection via Environmental Conservation to provide additional ecological connectivity. This corridor includes an area of Coastal Upland Swamps EEC, and will help to facilitate ecological connectivity. Revegetation of some lands north of Land Cove Road will be required to make this corridor functional from an ecological perspective.'

Figure 33 in the Biodiversity Report shows the area of mapped corridor as proposed Environmental Conservation (E2) to facilitate ecological connectivity. Corridor No. 5 is shown in Figure 33 as connected by proposed culverts for fauna crossing at the southernmost bend of Cicada Glen Road and at Lane Cove Road, near its intersection with Walter Road.

In our view, the mapped location of Corridor No. 5 is not supported by the ecological evidence presented in the draft technical studies. Despite the comment in Table 14, the only area of Coastal Upland Swamp mapped along Corridor No. 5 is located south of the Lane Cove Road, at a significant distance from our clients' properties and fragmented by the present condition of the land that has been cleared in parts for private use.

We note the comments at the top of page 66 of the Biodiversity Report to the effect that Pittwater Council, as it then was, supplied Ecological Australia with a GIS layer of the wildlife corridor (Figure 26) without supporting documentation in circumstances where it was unclear whether any field validation was conducted, particularly over private lands.

The third paragraph on page 66 of the Biodiversity Report states [in relation to the Pittwater Council's wildlife corridor mapping]:

'The wildlife corridor mapping has identified fragmented vegetation and often privately owned lands adjoining Mona Vale Road, as well as between Cicada Glen Road in the north to Mona Vale Road in the south and Monash Golf Course, as part of the corridors. These areas are likely to provide limited current connectivity, and would require substantial restoration works to function effectively as linkages for a wide suite of fauna species.'

Significantly, Ecological Australia's own wildlife corridor mapping (Figure 27) which was based on a combination of field study and desktop assessment, did not map a wildlife corridor in the location of Corridor No. 5.

Figure 27 is extracted below.



Figure 27.

We request that the Structure Plan be revised to be consistent with the wildlife corridor mapping conducted by Ecological Australia.

In our submission, the considerable resources which would otherwise be put towards 'substantial restoration works' required to re-establish an ecological corridor in the location of Corridor No. 5 could be better spent elsewhere in the Biodiversity Certification Assessment Area.

If it is thought necessary to impose planning controls over our clients' property in order to preserve the existing biodiversity value of this area, such as it is, we submit that adequate protections are available under Biodiversity clause 7.6 of the *Pittwater Local Environmental Plan 2014*.

If you would like to discuss the contents of this submission please do not hesitate to contact the undersigned.

Yours faithfully

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