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Planning,  
Housing and  
Infrastructure

# Patyegarang Planning Proposal

Consultation Outcomes Report

FEBRUARY 2024

Mecone





# Project Director

Mehra Jafari

## Contributors

Margaret Paige

Jack Ralph

REVISION	REVISION DATE	STATUS	AUTHORISED: NAME & SIGNATURE
1.0	18.12.2023	Draft	Mehra Jafari 
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\* This document is for discussion purposes only unless signed and dated by the persons identified.  
This document has been reviewed by the Project Director.

## Contact

### MECONE

Suite 1204b, Level 12, 179 Elizabeth Street  
Sydney, New South Wales 2000

info@mecone.com.au  
mecone.com.au

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mecone.com.au  
info@mecone.com.au  
02 8667 8668

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# Executive Summary

The Metropolitan Local Aboriginal Land Council (MLALC) has submitted a planning proposal to create a residential community with 450 new residential dwellings and a new cultural community centre, and to conserve and protect environmental and Aboriginal heritage on land owned by the MLALC at Morgan Road, Belrose. The planning proposal will implement the Northern Beaches Development Delivery Plan prepared under the *State Environmental Planning Policy (Planning Systems) 2021* which establishes a framework to enable the MLALC to realise the economic potential of their landholdings.

The NSW Department of Planning, Housing and Infrastructure (the department) placed the draft planning proposal on the NSW Planning Portal from 26 September 2023 to 7 November 2023 for public comment. The department accepted submissions made by members of the community after the formal exhibition close date to be included in the post-exhibition consideration of the planning proposal.

Submissions could be made via the NSW Planning Portal webform. Email and hard copy submissions were also received by the department.

The department received a total of 3,648 submissions from community members and community groups. Additionally, A total of 11 government agencies provided submissions, including Northern Beach Council.

This report, prepared by Mecone on behalf of the department, summarises these submissions. It captures key sentiments and the breadth of views without detailing each individual comment.

Almost all respondents express some concerns about the planning proposal. Submissions that are in favour of the proposal, those that express mixed views or which do not clearly express a sentiment total 2% of all submissions.

The table below provides an overview of the key themes raised in the submissions.

THEME	% OF SUBMISSIONS
Loss of bushland and natural habitat	87%
Location within area of bushfire risk	73%
Lack of infrastructure and services	65%
Poor alignment with the strategic planning framework	65%
Increased traffic and congestion	30%
Negative impacts on waterways	26%
Setting a precedent for rezoning and development	22%
Potential loss of cultural heritage	8%
Suitability of the site for development	4%
Housing supply	4%
Scale of proposed development	3%

Submissions from community groups express similar sentiments. Submissions from government stakeholders raised similar concerns with the draft proposal and provided detailed comment on the technical reports accompanying the draft proposal.



# 1 Introduction

## 1.1 About the planning proposal

The Metropolitan Local Aboriginal Land Council (MLALC) has submitted a planning proposal to create a residential community with 450 new residential dwellings and a new cultural community centre, and conserve and protect environmental and Aboriginal heritage on land owned by the MLALC at Morgan Road, Belrose.

The planning proposal applies to an area of 22 allotments, totalling 71ha of undeveloped and unmanaged land. The land is currently deferred from *Warringah Local Environmental Plan (LEP) 2011*, with development on the land subject to the controls in *Warringah LEP 2000*.

The area is commonly known as Lizard Rock. The MLALC has named the planning proposal Patyegarang to better reflect the cultural significance of the site to the local Aboriginal community.

**FIGURE 1: LOCATION OF THE PLANNING PROPOSAL LAND**



Source: Gyde 2023 (Nearmap)

The planning proposal seeks to:

- transfer the site from *Warringah LEP 2000* to *Warringah LEP 2011*.
- apply a mix of zones including R2 Low Density Residential to facilitate residential development, RE2 Private Recreation for the parts of the site for cultural heritage around Aboriginal rock carvings and the Snakes Creek riparian corridor and C2 Environmental Conservation for areas intended to be conserved.
- introduce a LEP provision to cap the total number of dwellings on the land at 450 dwellings.



- apply a minimum lot size LEP development standard that provides for a mix of lot sizes (200m<sup>2</sup>, 450m<sup>2</sup> and 600m<sup>2</sup>).
- introduce a maximum building height of 8.5m as a LEP development standard.
- permit dual occupancies as an additional permitted use within the R2 Low Density Residential zone to support housing diversity; and
- secure additional permitted uses within the RE2 Private Recreation zone to enable environmental management works, stormwater services, asset protection zone and bushfire works, utilities and servicing works where required.

This will implement the Northern Beaches Development Delivery Plan prepared under the *State Environmental Planning Policy (Planning Systems) 2021* which establishes a framework to enable the MLALC to realise the economic potential of their landholdings.

## 1.2 Purpose of this report

This Consultation Outcomes Report provides an overview of the engagement activities and feedback received from the community and stakeholders during the exhibition of the planning proposal for Patyegarang.

The report summarises:

- how the department engaged with the community and stakeholders.
- the submissions received, who provided feedback and the mechanisms for providing feedback.
- key issues raised by the community and community groups.

Each submission has been examined individually with key issues extracted and categorised under key themes. This report captures the key sentiments and breadth of views expressed through the consultation process. It does not capture every individual comment.

The feedback summarised in this report will inform the post-exhibition report to the Sydney North Strategic Planning Panel (the panel).

## 1.3 Exhibition period

The department placed the draft planning proposal on the NSW Planning Portal from 26 September 2023 to 7 November 2023 for public exhibition. The department accepted submissions made by members of the community after the formal exhibition close date to be included in the post-exhibition consideration of the planning proposal.

More information about Aboriginal Land and planning for this land was available on a dedicated Northern Beaches Aboriginal Land webpage <https://www.planning.nsw.gov.au/plans-for-your-area/priority-growth-areas-and-precincts/northern-beaches-aboriginal-land>.

Notification activities undertaken by the department to advise the community and stakeholders of the exhibition included:

- 700 notification letters sent to landowners located near the site.
- 3,465 emails delivered to subscribed contacts throughout the exhibition period.



- Digital advertising campaigns geo-targeted to communities in the Northern Beaches. These achieved 39,989 online impressions.

## 1.4 The submissions process

To provide feedback, respondents could use the NSW Planning Portal and webform at [Patyeagarang, Morgan Road, Belrose | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](https://www.patyeagarang.morganroad.belrose.nsw.gov.au/planning-portal)

A total of 3,665 submissions were received on the planning proposal from individuals and organisations, including government, environmental organisations, local societies, and advocacy groups, consisting of 1,808 Public Portal submissions, 1,317 Form Letter submissions (submitted via the Local Member Michael Regan MP), 168 Email submissions, and 355 Hardcopy Letter submissions.

- A total of 3,648 Community submissions received, comprising 15 group/organisation submissions and 3,633 individual submissions, which include:
  - 1 submission from Michael Regan MP, State Member for Wakehurst
  - 1 submission from Sophie Scamps MP, Federal Member for Mackellar
  - 1 submission from former State Member for Pittwater, Rory Amon MP
- 10 Government Agencies provided a total of 16 submissions. The Biodiversity, Conservation and Science Group (BCSG), the NSW Rural Fire Service (RFS), the NSW State Emergency Service (SES), Sydney Water, and Transport for NSW (TfNSW) provided multiple submissions.
- 1 Council submission from Northern Beaches Council.

## 2 Submissions Summary

### 2.1 Who made submissions

Local residents and interested community members provided most of the submissions. 11 submissions were received from government organisations and 15 were received from community groups and organisations.

Community feedback is spread across 110 postcodes with 94% of all community feedback where a suburb or postcode is provided, is from the Northern Beaches. Belrose (postcode 2085) is the suburb providing most submissions (17%). Figure 2 illustrates the postcodes where submissions represent approximately 2% or more of community submissions with a postcode.

**FIGURE 2: SUBMISSIONS BY POSTCODE AREA**





## 2.2 General sentiment

Most respondents express concerns about the planning proposal.

Approximately 36% of submissions are uniform hardcopy form cards highlighting concerns such as excessive clearing, bushfire risk, insufficient infrastructure, and loss of critical flora, fauna, and habitat. Another 10% of submissions are hardcopy form letters raising a series of concerns such as the loss of habitat and Sydney's "green lungs", bushfire risk, urban sprawl, and impact on water catchments.

Unique submissions range from short objections to the planning proposal to more detailed submissions raising pertinent questions about the potential outcomes of the planning proposal on the natural environment and cultural heritage, providing technical or local information knowledge regarding endangered species, considerations for traffic and bushfire or commentary on alignment with strategic planning policies and frameworks including the Northern Beaches Local Housing Strategy, Northern Beaches Local Strategic Planning Statement and regional plans.

Respondents expressing support represent 1.8% of total submissions. Submissions containing mixed views or no clearly expressed support/objection, are categorised as 'neutral' (0.3% of total).

## 3 Submissions by the Community

A total of 3,648 submissions were received from the community, 15 of which were from community groups and organisations.

The key issues raised by the community are summarised in Table 1 below.



TABLE 1: SUMMARY OF KEY THEMES RAISED BY THE COMMUNITY

THEME	% OF SUBMISSIONS
Loss of bushland and natural habitat	87%
Location within area of bushfire risk	73%
Lack of infrastructure and services	65%
Poor alignment with the strategic planning framework	65%
Increased traffic and congestion	30%
Negative impacts on waterways	26%
Setting a precedent for rezoning and development	22%
Potential loss of cultural heritage	8%
Suitability of the site for development	4%
Housing supply	4%
Scale of proposed development	3%

Some submissions also address the planning process associated with the planning proposal.

### 3.1 Loss of bushland and natural habitat

Most (87%) submissions express concern about potential impacts associated with the loss of bushland, including:

- Loss of habitat for native fauna (including endangered wildlife) which currently reside in or near the proposed development area (80% of submissions). This includes impacts relating to the displacement of local species and the loss of the wildlife corridor across the Patyegarang site.
- Loss of endangered flora and fauna species (37% of submissions). Species listed in the submissions as likely to be affected include the glossy black cockatoo, powerful owl, Rosenberg’s goannas, red-crowned toadlet, and the threatened Coastal Upland Swamp Endangered Ecological Community.
- Loss of bushland which serves as ‘green lungs’ and a carbon sink for the city. Submissions note that the bushland currently helps to mitigate the impacts of climate change (26% of submissions) and lower local air temperatures (17% of submissions).

36% of submissions suggest that clearing the equivalent of 45 football fields is excessive. Approximately 1% of submissions call for the land to be conserved as national park.

*“I am the collective voice of the creatures who cannot draft submissions, the ancient trees that cannot speak for themselves, and the children who deserve a future blessed with a thriving natural environment.”*



27% of submissions express concerns about the loss of bushland which is valued by the community for its contribution to the local character and landscape. Respondents note that, despite the site being private property, bushland is used by the local community for social and recreational purposes and contributes to mental health and wellbeing.

*“Living near the bush is what makes the northern beaches such a beautiful and inviting place to live and visit.”*

### 3.2 Location within area of bushfire risk

73% of respondents highlight the risk of bushfire, expressing concern that rezoning land identified as bush fire prone land for residential development may present a risk to life and dwellings. Some submissions note that in the context of climate change, there is potential for more frequent and severe weather events, including bush fire.

24% of submissions identify that the limited ingress and egress routes may not be able to facilitate effective evacuation in the case of a bushfire and may hinder access for firefighters.

*“The proposal proposes to build houses in places we know that people may not be safe in the future.”*

### 3.3 Availability of infrastructure and services

Potential issues relating to infrastructure are identified in 65% of submissions. These question the availability of adequate infrastructure and services to support the development. Submissions note the high cost of providing the infrastructure and express concern that this will need to be borne by the residents of the Northern Beaches Council area or the residents of the proposed development.

About 23% of submissions identify that the existing roads may not be able to cope with the increased traffic likely to result from development facilitated by the rezoning. A further 18% of submissions note that the public transport services may be inadequate to service the area. 4% of submissions comment on the availability of other infrastructure, including (but not limited to) schools, hospitals, wastewater and electricity.

42% of submissions cite infrastructure provision more generally and do not identify a specific area of concern.

### 3.4 Alignment with broader strategic planning directions

65% of submissions address strategic planning for the area. These submissions provide feedback on the proposed rezoning in the context of the current strategic planning frameworks such as the Greater Sydney Region Plan, the Northern Beaches Local Planning Statement – Towards 2040 and Local Housing Strategy which do not identify this land for future housing. A small number of submissions discuss the policy directions for housing to be located near to services and infrastructure, transport and existing centres.

*“The proposed development in this area of land is unnecessary”*



Some submissions also note that the proposed rezoning may not align with the proposed zoning of the land as C2 Conservation Zone as proposed by Northern Beaches Council's Environment Conservation Zone review.

### 3.5 Increased traffic and congestion

30% of submissions indicate concerns that the proposed rezoning may result in increased traffic volumes, congestion and commute times on local streets and/or major arterial roads on the Northern Beaches. Discussion highlights that the area is not served by nearby shops or social facilities, the topography is not conducive to walking and the location is not well served by public transport, resulting in a reliance on private cars.

Specific feedback comments on the limited capacity of Morgan Road to accommodate the increased traffic and increasing congestion on Forest Way, Wakehurst Parkway and Warringah Road.

Respondents also note that congestion could be compounded by the closure of Morgan Road and Wakehurst Parkway due to flooding during severe storms.

### 3.6 Negative impacts on waterways

26% of submissions raise concerns about the potential impacts of development facilitated by the planning proposal on the Narrabeen Lagoon and its catchment. These suggest that construction activity and the day-to-day work associated with development could increase hard surfaces and erosion on the edge of creeks leading to increasing siltation and decreased water quality of flows into Narrabeen Lagoon. Respondents also comment on the potential consequences of these impacts for species living in or dependent on the lagoon e.g. red-crowned toadlet.

### 3.7 Setting a precedent for rezoning and development

22% of submissions comment on the potential impact of the planning proposal on future expectations for rezoning and development in areas of bushland. Submissions discuss the possibility that the development facilitated by the planning proposal will encourage more development in the local area.

### 3.8 Potential loss of cultural heritage

A key theme in the submissions is preserving sites of cultural and heritage significance. 4% of submissions note that there is potential for these to be lost or damaged if the land is rezoned and developed.

A total of 4% of submissions relate to the land council's intention to raise funds through development of the land. Some respondents support development while others want the site retained as a valued cultural asset, A small number of submissions suggest the site should form part of an Aboriginal National Park or call on the NSW government to work with the MLALC to consider alternatives, including a land swap.

These comments don't recognise that the land is in freehold ownership, meaning it is not required to held and can be sold by the MLALC, and not all of the site is of cultural significance.

Some submissions indicate support for the proposed cultural centre.

A small proportion of respondents comment on the process for consultation with local Aboriginal groups in the Northern Beaches.



## 3.9 Suitability of the site for development

4% of submissions raise comments about the suitability of the land identified for residential development. Respondents note that the geographic features of the sites will result in high development costs and have flow-on effects across the ecosystem. These include:

- Topography and steep slopes, which will require substantial preparation work and clearing prior to development.
- Instability of ground surfaces and general erodibility of soils will be exacerbated by land clearing and an increase in hard surfaces and runoff.

Some respondents suggest that that the high development costs will mean that housing may not be as affordable as other homes in the area

## 3.10 Housing supply

4% of submissions address housing supply. Of these, 1% support the planning proposal highlighting that the rezoning will allow for additional housing in the area. These submissions highlight the limited housing supply in the Northern Beaches area and express the hope that the additional housing will improve affordability in the area.

*“Northern Beaches significantly lacks housing at all levels.”*

*“I understand that the development will have an impact on the area, but also appreciate the fact that there is a desperate need for more housing in all areas of Australia.”*

1% of submissions suggest that the Northern Beaches Council does not require this additional housing to meet its housing target.

## 3.11 Scale of proposed development

A total of 3% of respondents address the scale or density of development that will be facilitated by the planning proposal, with 2% of submissions indicating that they do not support the proposed density. A further 1% indicate that they support higher density development.

## 3.12 Process

Some submissions provide feedback on the process for the rezoning. Some of these submissions address the role of the department in the rezoning process. Other submissions request that the same planning ‘rules’ apply to the MLALC as apply to other landowners. Two submissions request that a public hearing be held in relation to the planning proposal.



## 4 Submissions by community groups

Fifteen submissions were made by community groups with an interest in the environment. The key issues raised in submissions by community groups relate to:

- Loss of bushland and natural habitat.
- Location within an area of bushfire risk.
- Lack of infrastructure and services.
- Increased traffic and congestion.
- Stormwater management and negative impact on the Narrabeen Lagoon and its catchment.
- Poor alignment with broader strategic planning directions.
- Potential setting of a precedent for rezoning of other areas of urban bushland.

### 4.1 Australian Conservation Foundation Northern Beaches Community Group

The Australian Conservation Foundation Northern Beaches (ACFNB) Community Group does not support the planning proposal due to the following concerns:

- Loss of high biodiversity value bushland providing habitat for flora and fauna and serving as 'green lungs' for Sydney.
- Negative impacts on the Narrabeen Lagoon, its catchment and threatened species from stormwater.
- Risks associated with locating housing in an area of very high to extreme bush fire risk.
- Likely increase in traffic and local congestion.
- Poor alignment with broader strategic planning being undertaken by Northern Beaches Council.
- Potential to set a precedent for the rezoning privately owned bushland in the Metropolitan Rural Area.

### 4.2 Coastal Environment Association

The Coastal Environment Association does not support the planning proposal due to the following concerns:

- Inadequate consideration of the increased risk of bush fire due to climate change and difficulties with evacuation.
- Loss of natural bushland and biodiversity.
- Lack of alignment with broader strategic planning objectives and strategies.
- Insufficient buffer areas to protect Aboriginal cultural sites and landscapes.
- Inconsistencies with management strategies for the Narrabeen Lagoon catchment and potential for siltation of water courses leading to increased flood risk.



- Poor resolution of requirement for asset protection zones with protection of natural conservation areas.
- The high cost of required urban infrastructure and services.

## 4.3 Friends of Narrabeen Lagoon Catchment

The Friends of the Narrabeen Lagoon Catchment does not support the planning proposal. The following concerns are raised:

- The potential loss of a large area of native bushland and the lack of reference to the requirements of the *NSW Biodiversity Conservation Act 2016* in the proposal.
- The lack of consideration of the importance of bushland in supporting mental and physical health.
- The location of the site within an area of bushfire risk with limited evacuation routes, and extensive clearing required for asset protection zones.
- The potential for increased stormwater runoff and potential negative impacts on water flows and quality and vegetation buffers.
- Poor alignment with the strategic planning studies and strategies which do not support urban development in this location.
- The site is in an isolated location with no infrastructure and no public transport services and will place an increased burden on Council, community and emergency services.
- The scale and density of development proposed for the site is an overdevelopment, compared to the scale of development permissible under current controls and will have high environmental impacts.
- Crown lands within the site should remain within public ownership.
- That not all issues identified in the independent assessment of the Development Delivery Plan, particularly relating to the natural environment, have been investigated and informed the proposal.
- The planning proposal is inconsistent with the *Aboriginal Land Rights Act 1983*, which requires that the land is not identified for residential purposes before transfer to the MLALC.
- The planning proposal and accompanying non-binding offer by the MLALC offer no benefit for the broader community or the environment, beyond what is usually required for subdivision, apart from the dedication of some conservation land.
- The role of the Department of Planning, Housing and Infrastructure in the Development Delivery Plan, recommending the inclusion of sites including Patyegarang in the previous Aboriginal Lands SEPP and assessing this planning proposal.

Detailed information relating to the importance of the site, including significant Aboriginal heritage sites, scenic values, rocky outcrops, endangered species and wildlife corridors is included in the submission. Details relating to site constraints including the capacity of the Warriewood Sewage Treatment Station, highly erodible soils and creek catchments are provided.

The Friends of the Narrabeen Lagoon Catchment recommends that submissions received, and the planning proposal are assessed by an independent planning authority. It also suggests alternative solutions for funding Aboriginal Land Councils to reduce the need for the Aboriginal Land Councils to develop their landholdings.



## 4.4 Northern Beaches Labor Environmental Action Network (NBLEAN)

Northern Beaches Labor Environmental Action Network (NBLEAN) does not support the proposal due to the following concerns:

- Poor alignment with the state and Northern Beaches Council strategic planning framework.
- Loss of biodiversity, remnant bushland and core habitat for threatened species of flora and fauna.
- The location within an area of high bushfire risk.
- Negative impact on wetlands, watercourses and soils within the Narrabeen catchment.
- Lack of support by Northern Beaches Council, local community and the principal environmental groups.
- The potential to establish a precedent for rezoning of other areas of urban bushland.

## 4.5 Friends of Ku-ring-gai Environment

Friends of the Ku-ring-gai Environment does not support the planning proposal due to the following concerns:

- Impact of clearing of bushland on habitat, endangered species, air quality and urban temperatures.
- Negative impact on the Narrabeen Lagoon from stormwater runoff.
- Risks associated with development in an area of extreme bushfire risk with limited evacuation routes.
- Poor alignment with broader strategic plans and policies.
- Lack of infrastructure and services servicing the site.
- Potential for increased traffic congestion.
- The potential to establish a precedent for similar rezoning requests.
- Lack of support from the local community.

Friends of Ku-ring-gai Environment recommends that the site, that they consider rich in Aboriginal cultural heritage and high conservation value should be celebrated and protected.

## 4.6 Pittwater Environmental Heritage Group

The Pittwater Environmental Heritage Group does not support the planning proposal due to the following concerns:

- The loss of bushland, biodiversity and habitat.
- Potential risk associated with bush fire and lack of evacuation routes.
- Poor alignment with broader strategic planning directions.



- Lack of community support and understanding of the outcomes and impacts of the proposal.

The Group notes that a key challenge associated with the proposal is achieving asset protection while conserving and protecting Aboriginal heritage.

## 4.7 Birdlife Australia (Southern NSW Branch)

Birdlife Australia does not support the planning proposal due to the following concerns:

- The likely loss of threatened woodland bird species, native birds and their habitat associated with the proposal. The critically endangered Regent Honeyeater and Swift Parrot are specifically referenced.
- Fragmentation of bushland caused by clearing, roads and increased urbanisation generally, with remnant forest and woodland that comprises the most significant wildlife corridors in Snake Creek and Upper Oxford Creek being separated the Deep Creek area of bushland and ultimately Ku-rig-gai Chase National Park

The Birdlife Australia submission also provides feedback on the biodiversity assessment, which is included in the discussion in Section 7.

## 4.8 Mosman Parks and Bushland Association

The Mosman Parks and Bushland Association supports the cultural centre and recommends that it contain a natural history section.

The Association is concerned about the loss of biodiversity and bushland. It recommends that the area to be developed is reduced and the environmental conservation area increased.

## 4.9 Australian Plant Society

The Northern Beaches branch of the Australian Plant Society does not support the planning proposal due to the following concerns:

- The richness of the vegetation across the site.
- The high bushfire risk and limited evacuation routes.
- Potential negative stormwater impacts downstream from the development.
- Poor alignment with strategic planning directions and policies.
- Poor alignment with national endeavours to reduce carbon emissions.

The submission also provides technical feedback on the Biodiversity Assessment.

The Society recommends:

- Additional biodiversity studies are conducted to address shortcomings in the existing biodiversity survey.
- An independent review of submissions and assessment of the proposal.



## 4.10 Save Northern Beaches Bushlands

Save Northern Beaches Bushlands does not support the planning proposal due to the following concerns:

- Loss of bushland, biodiversity, habitat and established ecosystems which support native flora and fauna.
- The land is subject to bushfire risk and identified as a flood prone area.
- Increase in pollution of air, land, and waterways.
- Impact on health and wellbeing of the community living in the area.

Save Northern Beaches Bushlands suggests that the bushland should be protected in perpetuity. It recommends reconsideration of a previous proposal for an Aboriginal Owned National Park (Gai-mariagal National Park) on this and other land in the Northern Beaches.

## 4.11 Save Manly Dam Catchment Committee

The Save Manly Dam Catchment Committee does not support the planning proposal due to the following concerns:

- Poor alignment with the strategic planning directions on the location of housing.
- Location in a bushfire prone area.
- Loss of a significant area of bushland, habitat and wildlife corridors which connect to national parks.
- Potential negative impacts on the Narrabeen Lagoon Catchment.
- Traffic impacts and availability of infrastructure.

It requests that alternative ways to support the MLALC are investigated as there is limited remaining urban bushland in Sydney.

## 4.12 National Parks Association of NSW – Sydney Region Branch

The National Parks Association - Sydney Region Branch (NPA) identifies the following concerns with the proposal:

- Substantial loss of vegetation and loss and fragmentation of habitat for threatened species.
- Lack of consideration of or planning for climate change effects.
- The potential impacts of development on water flows and availability for vegetated areas, both within the proposed conservation areas and outside the site.
- The extent of bush fire risk in the area and limited evacuation routes.
- The scale of development requiring significant loss of tree canopy and urban green space to deliver more dwellings than required in the Local Housing Strategy and only 45 affordable dwellings.

The NPA also provides detailed comment on some of the supporting technical documents.



## 4.13 Garigal Landcare Group

The Garigal Landcare Group does not support the planning proposal due to the following concerns:

- Loss of high-quality bushland and biodiversity.
- High risk of bushfire with few evacuation routes.
- The creation of a car dependent community.
- Poor alignment with overall strategic planning policies and strategies.
- Potential for increased localised flooding and negative impact on water quality of local creeks.
- The geological dyke and kaolin deposits in the area may have Aboriginal cultural significance which has not been assessed.

The Garigal Landcare Group requests that the planning proposal is independently assessed.

## 4.14 Northern Beaches Envirolink Inc

The Northern Beaches Envirolink Inc (also known as the Northern Beaches Bushland Guardians campaign) does not support the planning proposal due to the following concerns:

- Loss of significant amount of interconnecting habitat would have broader implications for the habitat and a range of species.
- Considers that the BDAR report is inadequate, and the proposal should be refused due to its unacceptable environmental impacts and inadequate information provided.
- Considers the site has 11 vegetation types not the 3 vegetation types as described in the BDAR report and there is further potential for impact on Duffys Forest Endangered Ecological Community.
- The site has a large number of features which make it unsuitable for the proposed housing from a planning perspective. Concern over inappropriate proposed zone, lack of site specific merit and excessive number of housing lots is not consistent with local character
- Concerns over bushfire risk to new residents and that the submitted reports do not align with Council's bushfire report by Blackash.
- Concerns over potential increased traffic impacts with a lack of public transport resulting in increased car dependency.
- The geological dyke and kaolin deposits in the area may have Aboriginal cultural significance which has not been assessed.

# 5 Submissions from peak bodies

## 5.1 NSW Council of Social Service (NCOSS)

NCOSS supports the planning proposal as it will:



- Provide an opportunity for self-determination by the Metropolitan Local Aboriginal Land Council.
- Increase housing supply, diversity and affordable housing in the Northern Beaches LGA.
- Provide a range of community benefits including pedestrian and cycling paths and public open space.
- Provide bushfire protection and management for the site through new Asset Protection Zone and fire trails and improve the level of bushfire protection for adjoining development.
- Provide an opportunity for the broader community to engage with and better understand Aboriginal heritage through protection of Aboriginal heritage items, a proposed new cultural community facility and informative and interpretive signage and wayfinding.
- assists State government and the Northern Beaches Council in meeting their responsibilities under the Closing the Gap agreement.

## 6 Conclusion

The submissions received in response to the public exhibition of the planning proposal for Patyegarang express concern about the proposed rezoning of the land for residential development.

A total of 3,665 submissions were received from stakeholders across the community, community groups, and across 11 government agencies, including Council. Key concerns identified in the submissions are:

- **Loss of bushland:** In 87% of submissions this is a significant concern. This includes the loss of habitat for native fauna, impacts leading to loss of endangered species of plants and endangered ecological communities and the loss of a 'carbon sink for the city. There is also concern expressed regarding the loss of bushland valued for its contribution to the local character and landscape.
- **Bushfire Risk:** 73% of submissions highlight that the land is identified as bushfire prone land, and residential development will present a risk to life and dwellings. Concern is also expressed regarding the limited evacuation routes in the locality.
- **Lack of Infrastructure and services:** 65% of submissions express concerns including that there is limited infrastructure and services in the area to support development, that the existing roads will not be able to cope with the increased traffic generation and the limited public transport services available in the area.
- **Poor alignment with strategic planning:** 65% of submissions note that strategic planning has not identified this land for future housing and that the proposed zoning of the land does not align with the proposed zoning of the land by the Northern Beaches Council as a conservation zone.



The overall sentiment of the submissions is that the land is not appropriate for the proposed future development.

*“This is not a NIMBY issue. I fully support planned, affordable, energy efficient homes in my area. This particular location is not a wise choice.”*

*“A large area of valuable natural resources gets destroyed for a very modest gain of dwellings.”*

## 7 Next steps

The issues identified in this report will be considered in an Independent Planning Recommendations report. This report will inform the department's report to the Sydney North Strategic Planning Panel on the future of the planning proposal.



