

**From:**  
**To:** [council](#)  
**Cc:**  
**Subject:** Attention Luke Munro - Planning  
**Date:** Sunday, 26 January 2020 7:52:34 AM  
**Attachments:** [image001.png](#)

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Development Application (10.2019.466.1)

Dear Sir,

I write to express my concerns at the proposed subdivision at Lot 282 D.P.1018663 Bottlebrush Crescent, Suffolk Park.

Our concerns relate to bush fires and the likelihood of increased bushfire risk.

The latest plans propose 17 lots, of which 11 lots are densely situated at the rear (western) end of the site. These 11 blocks are very close together in an area which has a high risk of bush fires. The recent drought, and no doubt those that are forecast for the future due to climate change, make the western area extremely bush fire prone with limited access. The proposed road out of the western area is very narrow (one way) and there would be issues with traffic in an emergency situation. Imagine those people rushing home to get things at a time when others would be trying to leave?

Council has identified bush fire related issues with previous subdivision applications on this site. More recently in October 2018, council declared an “climate emergency” – see [here](#).

*“In a shire like Byron that will mean sea level rise and a likely **increase** in floods, droughts, **fires** and extreme weather events such as damaging storms,” Cr Coorey said.*

Cr Coorey’s comments are correct and the recent bushfire disasters in NSW are evidence of this.

To allow the construction of dwellings and people to live in such a bushfire prone area – even more so now that ever before – is an irresponsible act that council should not permit.

The lack of access to and from the western end of this site has always been an issue for council. I hope that council addresses access for bush fire purposes in this application. The density of the proposed lots will no doubt increase the need to access the area in the event of any emergency.

I ask you to please reconsider the proposed subdivision and density of the housing for the above reasons.

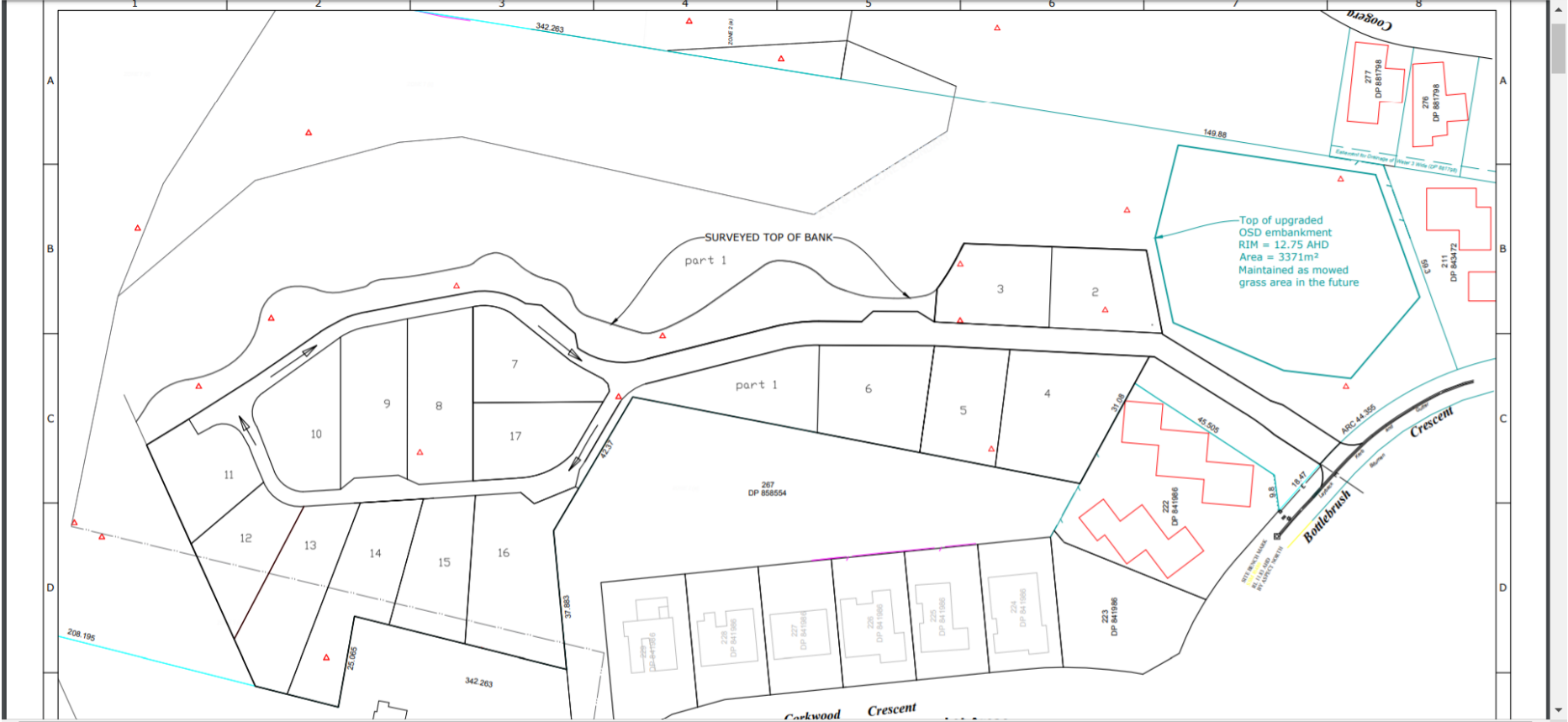
Your sincerely,

Dear [REDACTED]

[REDACTED] the On-site Stormwater Detention (OSD) basin which in years gone by caused numerous problems when there has been a deluge in rainfall, resulting in my and other houses in the immediate area to be totally inundated, inside and out. These were 'freak' instances however they have occurred 3 times since 1999 [REDACTED] and there have been other 'close-calls'.

I have looked at the Engineering Design and can see there is mention of the OSD. From memory, in years gone by when our houses were inundated, no one and Council seemed to know who was responsible for the maintenance of the OSD. Do you know who is? In addition, has there been consideration of increasing the diameter of the pipe that empties the OSD under Bottlebrush Crescent?

I am no engineer and can only think that the stormwater/runoff will increase once Lot 282 has been developed (17 lots) and if so, is the drainage adequate to prevent my property and surrounding neighbours from being inundated with water?



## **Submission on development application 10.2019.466.1 'Community Title Subdivision Seventeen (17) Lots'**

I am a resident of Hayter's Drive, Suffolk Park and owner of a lot within the Community Title estate known as Seacliffs. The Community Lot (Lot 1) at Seacliffs adjoins the land at 41 Bottlebrush Crescent along the northern boundary.

I wish to express my concern at the scale of this development and consider the number of lots and impact on the natural values of the site to be beyond an acceptable level and will create a negative impact on the environment and adjoining properties at Byron Hills - Suffolk Park.

**The development application 10.2019.466.1 'Community Title Subdivision Seventeen (17) Lots' proposal should not be approved in its current form** for the following reasons.

**The number of residential lots (16) and the very small lot sizes** are an over development of the site. The APZ requirements alone seriously impacts on the available lot area / building envelope for home construction, and the capacity for lot owners to have adequate amenity such landscaping or screen planting, and for garden / lawn areas on each lot. The majority of the lots are less than 750 square metres in area and are further and significantly reduced by APZ requirements.

I understand that smaller lot sizes are a positive planning direction for the shire, but feel this subdivision will create an 'overcrowded enclave' with a very low level of residential privacy and community experience. Overall it lacks sufficient buffers and setbacks between future dwellings, and has little regard to the site's land surface and its favourable aspects. Overshading from adjoining dwellings (and likely landowner discontent or conflict) would become a feature of this future residential area.

**Many of the lots are also of a very irregular shape and dimension** which will also impede reasonable residential experience. It appears that the lots have been 'squeezed in' just to maximize available lots and meet the planning provisions within the current land zoning.

**There is only one access road to the site** and in the event of wild fire or other emergency there is no alternative access or escape route for residents. Further, the narrow road pavement (4.0 meters) in the western section of the proposal will not allow for safe passing of fire control and other emergency service vehicles. In addition, the elevated nature of the site is likely to have water pressure issues and sufficient delivery of water for fire fighting (as well as domestic use) is of concern.

**The vegetation assessment and mapping** done in 2005 by JWA is well out of date and should not be used as the basis of the BDAR and Bushfire Protection Assessment Report. AWC (Australian Wetlands Consulting) make this point themselves (refer BDAR Report page 10) ..... 'It must be noted that since the survey in 2005, the Rainforest Community Mid-high Mixed Rainforest identified has developed and it is considered this is now consistent with the EEC'. Subsequently, I believe this would meet the status and be determined to be Littoral Rainforest EEC, as the native vegetation is likely to be in good to

very good condition and would affect the environmental assessment and the credit calculations in the BDAR.

**New and current vegetation assessment and mapping need to be completed**, and the BDAR credit recalculated based on current vegetation condition.

**Further, a full inventory of the tree and shrub species** that are proposed to be removed needs to be undertaken to get an accurate picture of the loss of biodiversity on the site. A range of options needs to be provided to ameliorate this impact within the proposed development and on the Community Lot.

**A Vegetation Management Plan (VMP)** should accompany the Development Application and be of a high professional standard and consistent with the appropriate management of high conservation value vegetation and endangered ecological community forest.

In the event of approving this development, Council needs to require a VMP and specify VMP content and format that provides management recommendations that leads to favourable forest restoration, revegetation and habitat management outcomes. Specific attention to restoration and revegetation method, management units, important habitats, action priorities, risk management, costing, contracting and monitoring is required. **The VMP also needs to have clear guidelines for future long-term management** of the Community Lot by the residents as required under community title association mechanisms. Long-term management is a conservation management imperative, and these works will complement other community environmental management being undertaken within the local environs at Suffolk Park.

kind regards

**From:** [no-reply-da-tracking@byron.nsw.gov.au](mailto:no-reply-da-tracking@byron.nsw.gov.au)  
**To:** [submissions](#)  
**Subject:** 10.2019.466.1\_Submission and Acknowledgement\_Oppose  
**Date:** Wednesday, 16 October 2019 10:21:24 PM

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Description: Community Title Subdivision Seventeen (17) Lots

Properties: 41 Bottlebrush Crs, Suffolk Park 2481 NSW (LOT: 282 DP: 1018663)

Summary of Submission details.

Submission: Oppose

Grounds For Objection or Support: Suffolk Park is losing trees and vegetation at an alarming rate. Recently built new houses are denuding the area of green vegetation which is destroying the nature of the suburb and turning it into a concrete wasteland. For example a recent build at 41 Armstrong St has scraped every shred of green from the site and replaced it with concrete. This DA will have a serious impact on the area of Bottlebrush Cr as it is gross over development with very small lots leaving little room for adequate garden and landscaping. With increasing hot weather we need more trees in the suburb, not less. I therefore oppose the density of building proposed for this site.

Yours faithfully,