

Wednesday, 20 March, 2019

Ms Terese Manns
General Manager
Randwick City Council
30 Frances Street
Randwick NSW 2031

Via Email: - council@randwick.nsw.gov.au

CC:

- NSW Premier, the Hon. Gladys Berejiklian MP
- The NSW Minister for the Environment, the Hon. Gabrielle Upton MP
- The Shadow Minister for the Environment, Penny Sharpe MLC
- Mr Carlos Da Rocha
- Mr Noel D'Souza
- Danny Said (Deputy Mayor)
- Greens NSW Environment Spokesperson, Dr Mehreen Faruqi MLC
- Councillor Veitch, West Ward
- State Member for Maroubra, The Hon Michael Daley,MP

Dear Ms Manns,

**Objection to Amended DAs at 11 Jennifer Street, Little Bay NSW 2036
DA-505/2017, DA-66/2018 and DA-101/2018**

I am writing as the Managing Agent for the Prince Henry at Little Bay Community Association DP 270427 (the CA). The CA borders Jennifer Street and represents around 1000 dwellings comprising some 3000 residents, several retailers, and a number of NGOs. The 11 Jennifer Street site is some 50 meters from the Prince Henry CA boundary.

The CA has written to you previously, but it has come to our attention that while no new DA has been lodged, the Applicant has filed a motion in the proceedings seeking to rely on amended plans for the three DAs that have been lodged.

We would like to state that we have reviewed the modified plans and they do not allay our objections.

This habitat is protected by the Threatened Species Conservation Act and Environment Protection and Biodiversity Conservation Act. According to the Office of Environment and Heritage, 'less than 3 per cent of the original distribution of this community remains in a number of isolated remnants' including the site at 11 Jennifer Street, Little Bay. The major threat to this habitat is the 'further loss and fragmentation of habitat as a consequence of clearing and development.'

The CA notes that the site at 11 Jennifer Street, Little Bay (Lot 5250 in DP 822223), which is subject to Amended Development Applications including DA-505/2017, DA66/2018 and DA-101/2018, is home to one of the last remaining fragments of the critically endangered Eastern Suburbs Banksia Scrub (henceforth referred to as ESBS).

Here are the CA's objections to the amended plans:

- There is no substantial buffer between the ESBS and the new construction, which is essential;
- There will be too much overshadowing for it to survive, or for some of the component species to survive;
- The buildings are proposed for the edge areas which were ESBS but are now weed infestations: this area has the potential to be ESBS again once weeds and rubbish are carefully removed;
- And our clear understanding that the underground basement linking the two main blocks will have to be excavated, and that will destroy any chance of the ESBS recovering. It says in the amended plan that the "ESBS will be reconstructed on top"- this is not feasible because ESBS regeneration depends on the soils being undisturbed. After all, if one could just "recreate" ESBS, there would be no need to conserve it in the first place.

Since ESBS has now gained the status of "critically endangered" (next stage = extinction), it is the government's position that every little bit should be thoughtfully conserved and protected. The key to ESBS recovery and survival is the soil it grows on. The soil is a particular type of soil rare here - Podzols formed on 10,000 - 100,000 year old Aeolian (wind-blown) consolidated sand dunes, which are extremely nutrient deficient, giving rise to a great number of species in a small space - each one takes advantage of a niche - heat, cold, rain, dry, etc - the seeds remain in the soil until conditions are right, then they emerge. Every year we see different plants doing well, some dying off, some new ones emerging.

A good example of ESBS recovery was in 2004, when the Byrne Crescent ESBS patch was subjected to a management burn. This ESBS was in a much worse state than the 11 Jennifer St patch. They cut down all the vegetation - the dominant tea tree which had more or less formed a monoculture mixed with bitou, placed it all in piles and burned it. In the following two years, we witnessed the most amazing regeneration of plants, many of which had not been seen for

over 30 years. All that needed to be done was to weed it occasionally as the new plants were emerging.

In addition to the serious environmental issues detailed above, the CA would also like to object on the basis that there are no other residential buildings on the eastern side of Jennifer Street, which comprises mainly National Parkland. All residential dwellings currently in Jennifer Street are on the western side of the road. And, a multi dwelling development is not in keeping with Jennifer Street or the surrounding area, which comprises mainly individual dwellings of one and two storeys.

We respectfully ask that the DA is rejected:

Should you have any questions relating to this matter, please do not hesitate to contact myself on either (02) 8203 3111, 0414 469 694 or mite@changestrata.com.au.

Yours sincerely,
CHANGE STRATA MANAGEMENT



mite domazetovski
managing director