



5 November, 2023

To C/o [NSW Department of Planning and Environment](#)

Dear Sir/Madam

FOKE opposes the rezoning of land at Patyegarang, Morgan Road, Belrose (PP-2022-3802), formerly known as 'Lizard Rock' on public exhibition until 7 November, 2023

FOKE wishes to express its strong opposition to the proposal to rezone 71ha of high conservation value bushland at Patyegarang, Morgan Road, Belrose (PP-2022-3802), formerly known as 'Lizard Rock'. If the 450 residential dwellings at Morgan Road, Belrose/Oxford Falls are approved it would have a detrimental, devastating and irreversible environmental impact on the Northern Beaches' biodiversity, climate, bushfire safety, strategic planning as well as setting a dangerous precedent for other bushland sites, some of which will impact on Ku-ring-gai's bushland.

Friends of the Ku-ring-gai Environment (FOKE) is a community based organisation aimed at protecting and conserving the natural, built and cultural heritage of Ku-ring-gai.

FOKE opposes the rezoning proposal of Patyegarang, Morgan Road, Belrose (PP-2022-3802) for the following reasons:

Negative impact on Biodiversity

NSW is facing an extinction crisis with over 1000 species on the threatened list, yet the Patyegarang Planning Proposal will clear massive areas of intact and pristine bushland that will destroy habitat and exacerbate NSW's biodiversity crisis.

FOKE notes that the planning proposal seeks to rezone 19.8ha of the site for C2 Environmental Conservation purposes but argues that this is inadequate in protecting the high biodiversity of the whole site.

If approved the rezoning will lead to irreversible loss and local extinction of endangered species including powerful owls, red-crowned toadlets, bandicoots, lyrebirds, wallabies, threatened glossy black cockatoos and endangered heath monitors.

Negative impact on the Narrabeen Lagoon Catchment

If approved the rezoning will create unacceptable increases in stormwater runoff that risks flooding the Wakehurst Parkway and Oxford Falls Roads.

Excess stormwater runoff will also negatively impact on threatened species including the red-crowned toadlets and spotted-tail quolls and other marine animals living in and around the Narrabeen Lagoon.

Negative Impact on Sydney’s air quality, temperatures and carbon emissions

If approved the rezoning will exacerbate air pollutants, increase urban heat and reduce opportunities to capture greenhouse gases.

Urban bushland provides vital ecological services, such as oxygen, and water. Urban bushland sites, such as Patyegarang “plays a key role in the climate system” providing essential carbon sinks to regulate Sydney’s temperatures and help store carbon. The NSW Government has a responsibility to commit to climate action and ensure it contributes to keeping global warming to no more than 1.5°C as agreed in the Paris Climate Agreement. Australia is one of twenty countries that is responsible for about 75 per cent of global greenhouse gas emissions.

Negative Impact on Life and Property during Bushfires

The site is located on bushfire-prone lands above a forested valley. [Northern Beaches Council](#) has identified the site as having ‘extreme bushfire risk’ and evacuation problems with limited egress.

In a changing climate, bushfires are increasing in frequency and intensity. It is no longer acceptable for new developments to be built in bushfire areas. They pose unacceptable risks to the safety of residents, RFS and SES volunteers. Preserving bushland corridors are also vital escape routes for wildlife during bushfires. If the NSW Government is committed to implementing the recommendations of the ‘[Bushfire Royal Commission](#)’ it must reject this rezoning proposal.

Broader Strategic planning implications

This rezoning proposal is effectively a ‘spot’ rezoning and inconsistent with key aspects of the Greater Sydney Region Plan, North District Plan, Northern Beaches Local Strategic Planning Statement – Towards 2040, and Northern Beaches Local Housing Strategy, particularly in terms of the preferred location and type of new housing and impacts on the environment and Metropolitan Rural Area.

The site lacks infrastructure and appropriate services (schools, open spaces, sports fields, bus services, health services, libraries).

Despite the proposal seeking a limit of 450 dwellings, it is highly likely that once approved, further rezoning applications will occur to increase the site’s density.

Unacceptable traffic and urban sprawl

The proposal will add to traffic congestion along Forest Way, Wakehurst Parkway, Warringah Road and Mona Vale Road contributing to more greenhouse gases. Evidence shows that long-term exposure to traffic-related air pollution has detrimental impacts on human health.

Precedent for further inappropriate overdevelopment

If the Patyegarang Planning Proposal is approved it sets a precedent for further rezonings of Northern Beaches Aboriginal Land that includes the 135-hectare bushland site at Ralston Avenue in Belrose (only 3.5km from the Patyegarang/Lizard Rock site) adjoining the Garigal National Park and the Ku-ring-gai bushland suburbs of St Ives, East Killara and East Lindfield. Development on this site poses extreme bushfire risk with the presence of overhead power lines with electrical currents between 66,000 to 500,000 volts surging through them.

Overwhelmingly community opposition to rezoning proposal

The Metropolitan Local Aboriginal Land Council (MLALC) owns 912ha of bushland in the Northern Beaches, much of it permissible for residential development under the Aboriginal Land State Environmental Planning Policy (SEPP). Ownership has been made possible by the NSW Aboriginal Land Rights Act 1983 that supports First Nations people's economic self-determination through property development.

However, development needs to be assessed on its planning merits. The proposed development is not ecologically sustainable and not in the public interest.

On 29 June 2023, a Northern Beaches Bushland Guardians petition, signed by 12,000 people, including FOKE members and Ku-ring-gai residents, was presented to the NSW Legislative Assembly calling for the NSW Parliament to *“repeal the amendments to the State Environment Planning Policy (Planning Systems) so that 227 hectares of land in the northern beaches is no longer subject to the development delivery plan.”*

Sydney is blessed to have this bushland site, Patyegarang, with its rich Aboriginal cultural heritage and high conservation value. This is something that the NSW Government should celebrate and protect.

FOKE thus strongly urges the NSW Government to reject the Patyegarang, Morgan Road, Belrose (PP-2022-3802) planning proposal.

Yours faithfully

Kathy Cowley

Kathy Cowley
PRESIDENT

cc The Hon Paul Scully MP Minister for Planning and Public Spaces

cc The Hon Stephen Kamper MP Minister for Lands and Property

cc The Hon Jihad Dib MP Minister of Emergency Services

cc The Hon Penny Sharpe MLC Minister for Climate Change, Minister for the Environment

cc The Hon Tanya Plibersek MP Commonwealth Minister for the Environment and Water

cc Ku-ring-gai Mayor and Councillors

cc The Hon Matt Cross MP Member for Davidson

cc The Hon Alister Henskens SC MP Member for Ku-ring-gai

cc The Hon Paul Fletcher MP Member for Bradfield