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30/04/2024

DR Emilie Field
- 10 Yarrabee PL
Bilgola Plateau NSW 2107
[REDACTED]

RE: DA2024/0303 - 337 Lower Plateau Road BILGOLA PLATEAU NSW 2107

Dear Anne Marie Young,

I am writing to formally oppose the development application for the subdivision of 337 Lower Plateau Road, Bilgola Plateau into 3 lots and the construction of one dwelling on each lot. It is my strong contention that this proposal should be rejected based on several grounds, including its non-compliance with the Pittwater Local Environmental Plan 2014 (PLEP), the significant adverse impacts on the local environment, the loss of critical habitat for fauna including vulnerable species, and the potential threats to cultural heritage.

The proposed development will result in the clearing of approximately 100 trees, including a high retention value tree and 23 medium retention value trees. This extensive clearing will lead to a substantial loss of canopy cover and habitat, posing a grave threat to local native fauna.

An on-ground inspection of the site, conducted by Ecologist Geraldene Dalby-Ball, revealed the presence of powerful owls in the area, along with Eastern Whipbirds. It was noted that the trees likely provided habitats for ringtail possums, microbats, and flying foxes. Such diverse and sensitive wildlife populations are indicative of the ecological importance of the area and underscore the need for its preservation.

Furthermore, the proposed development will disrupt critical wildlife corridors and breeding grounds, further jeopardizing the survival of these already vulnerable species. The loss of suitable nesting sites, foraging grounds, and shelter will exacerbate the decline of these populations and undermine efforts to conserve and protect them.

The site in question contains vegetation that is likely part of the Escarpment Moist Forest and PCT 3592 - Sydney Coastal Enriched Sandstone Forest. These ecosystems are of significant local ecological value and must be protected from further clearing.

Moreover, the proposed development will have adverse impacts on local traffic and infrastructure. Lower Plateau Road currently lacks on-street parking and footpaths, and the addition of two extra lots will exacerbate congestion and safety concerns in the area. The widening of the driveway to accommodate increased traffic will likely affect tree 94, a sandpaper fig and other vital root systems. It is noted that no root evaluation report has been undertaken to assess the potential damage to this significant region of Forest.

The increased silt and sediment runoff resulting from these activities could introduce pathogens, including Phytophthora, into local waterways, endangering their ecological health. I feel it is imperative that a comprehensive assessment of the potential impacts of development on water quality and aquatic ecosystems be conducted before any further development proceeds.

The introduction of six additional waste bins (general, recycling and green) on collection days will exacerbate the already limited frontage, presenting logistical challenges, congestion and exacerbating safety hazards, particularly along a road characterized by blind corners, elevated terrains and no pathways. The suggestion of implementing a traffic light system to manage the anticipated surge in traffic raises concerns regarding the feasibility and safety of such an approach, particularly in light of the potentially adverse consequences associated with system malfunctions and maintenance issues.

In addition to the environmental concerns, there the likelihood of Indigenous heritage that needs to be investigated further. As stated by the report, it is possible that sharpening grooves could be present deep under leaf litter, indicating the presence of Indigenous cultural sites. Failure to adequately assess and mitigate the potential impacts on Indigenous heritage would constitute a breach of legal obligations and ethical responsibilities.

In light of the preceding concerns, I earnestly implore the Northern Beaches Council to decline the development application for the subdivision of 337 Lower Plateau Road, Bilgola Plateau. The preservation of critical ecosystems, the protection of cultural heritage, the safeguarding of fauna, and the mitigation of adverse environmental impacts must unequivocally take precedence over any short-term developmental interests.

Yours sincerely,

Dr Emilie Field