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Subject: Online Submission

30/05/2023

MS Danielle Bressington
York TCE
Bilgola Plateau NSW 2107
[REDACTED]

RE: DA2023/0511 - 337 Lower Plateau Road BILGOLA PLATEAU NSW 2107

Thank you for the opportunity to comment on the proposed subdivision and tree removal at 337 Lower Plateau Rd, Bilgola Plateau.

I strongly oppose the proposed development in its current form for the following reasons:

1.) Loss of trees and impact upon wildlife and biodiversity-

The DA proposes a loss of 93 trees in what is described in the arborist's report as a large, densely vegetated site with many tall trees and thick understorey. This describes perfect habitat and a vital wildlife corridor. This is evidenced in aerial photos of the block within the context of the surrounding suburb.

The report downplays the loss of trees by summarising it as a loss of only 26 protected species. The issue with this is that regardless of the species present, this clearly is a rich and valuable ecosystem; one that is tied closely to the two creeks running through it as a life-giving water source.

Thanks to my involvement with local tree advocacy group "Canopy Keepers" and local wildlife carers, I have become acutely aware of how our native wildlife doesn't necessarily discriminate against non-native when it comes to habitat. Especially given their fast-dwindling options.

This a large (almost 3,500 sqm), protected site with a dense canopy within a gully, one that neighbours have described as being home to "lorikeets, king parrots, possums, brush turkeys, powerful owls and (visited occasionally by) Black Cockatoos and sugar gliders". Eastern water dragons are also prevalent within the surrounding area thanks to the vital water source and protected habitat.

I understand that Birdlife Australia have recorded roosting and nesting sites of Powerful Owls within one kilometre of this property, and so it stands to reason that such a large, protected and densely vegetated block would be a hunting ground, resting place and possible nesting site ; due to the presence of many species that Powerful Owls prey upon; e.g. Ringtail Possums, gliders, Flying Foxes, bandicoots and other birds. Our Powerful Owl community was described by Birdlife Australia's powerful owl project officer Beth Mott back in 2017 as being " a vulnerable species...one step away from becoming endangered".

Since then we know their numbers have declined greatly. She describes their ideal habitat as being "along the creek lines, gullies and waterways, and because they are nocturnal they roost during the day in densely vegetated trees above a creek". Precisely what is present at 337 Lower Plateau Rd.

The S.E.E provided relies heavily on the arborist's report to support it's claim that the "development shall not negatively impact on threatened species, endangered populations or endangered ecological communities". However the arborist's report states itself that it serves only to "assess the vigour and condition of the surveyed trees, and identify the potential impacts the proposed development may have on those trees to be retained in proximity to the works". Neither the arborist's report nor the S.E.E makes mention of other flora or any fauna, including nesting sites or even evidence of wildlife activity such as bark markings from Sugar Gliders.

Given no documents or reports have been supplied to support the above claim, one would question it's veracity.

I welcome the Biodiversity department's decision to NOT support this DA, and its request that a Flora and Fauna assessment be carried out. Given that council's 'Biodiversity Requirements for Development Applications' document clearly outlines the assessments required for a property such as this, I am surprised and disappointed that BBF Town Planners have not already been forthcoming with this document.

I also note that Biodiversity dept. highlights the vegetation-type of the area as having significance. I understand that it falls within the threatened Wagstaffe Spotted Gum community, with a possible question mark over potential Littoral Rainforest status. It's description as a gully in the Geotech report, with rainforest plants lends evidence to the Littoral Rainforest description.

I would hope to see the public exhibition period for this DA reinstated upon the uploading of the F&F report- in the interests of transparency and veracity- given the overwhelming environmental concern of residents. It is unfair to expect the community to form a fully educated opinion when such a crucial document is missing during the initial 2 week exhibition period.

These are just the concerns for the proposed subdivision. Further degradation of the land will undoubtedly occur with the construction of dwellings, with the potential for pools, landscaping and even granny flats.

With the looming threat of loss of conservation status zoning to so many Bilgola Plateau properties, combined with current canopy tree loss and lack of compliance around tree replacement, properties such as this should be considered for their irreplaceable ecological value, and the best possible outcome should be sort at every stage of council's decision-making process. And that is my request of council; best practice, best outcomes.

2.) Potential for land instability and landslips.

There is credible cause for concern that the substantial clearing of vegetation of the block- described as steep/very steep in the geotech report- for both the subdivision and inevitable future development of the 3 blocks (dwellings, pools, hard and soft landscaping etc.) will undermine the stability of this land by altering the soil stability and the natural water courses. Bilgola Plateau has a long history of landslip events, with many being recorded during the recent period of unprecedented rain. I don't think we've seen the end of these weather events, and the geotech report only addresses issues around subdivision. It says nothing of future land clearing and land disturbance.

The accumulative affect of sustained land clearing across the suburb should be taken into consideration here.

*Daily Telegraph ; April 2017.

