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**From:** Deb Collins @ Canopy Keepers  
**Sent:** 11/04/2025 4:52:52 PM  
**To:** Council Northernbeaches Mailbox  
**Subject:** Objection to MOD 2025/0071  
**Attachments:** Submission 69-71 Central Rd Avalon Canopy Keepers.pdf;

Please find attached our submission objecting to the Modification 2025/0071 of the Development at 69-71 Central rd Avalon Beach .  
We thank you for considering our perspective.

Sincerely,  
Deb Collins on behalf of  
Canopy Keepers  
Here for the Trees  
PO Box 838, Avalon Beach 2107  




**Canopy Keepers**

PO Box 838, Avalon Beach 2107

April 11 2025

To the Planning Department

Re: CANOPY KEEPERS' SUBMISSION: 69-71 Central Road, Avalon Beach - MOD2025/0071

Canopy Keepers (CK) wish to register our acute concern regarding the above modification to an already extreme DA that proposes the removal of 70 trees. This DA was submitted prior to the existence of the Canopy Keepers (CK) community group, so we were unable to object at the time. CK strongly opposes the DA and the Modifications. The sheer number of significant habitat native trees to be removed is extreme and unnecessary. The modifications suggested puts even greater pressure on the biodiversity and ecology of the site and the surrounding area by increasing the building envelope and encroachment on nearby significant trees.

We are particularly concerned about the proposed removal of:

- 4 road reserve trees (all locally native) - white mahogany T17, cheese tree T17A, rough-barked apple T17B, & Sydney red gum T18, for the unnecessary widening of the proposed driveway
- these significant and threatened trees: T19 T35, 35A, 23, 23A & B – classed as "too close to development footprint"
- Plus, other habitat trees on the site.

We request these proposed tree removals be seriously reconsidered.

We also object to the level of encroachment upon Trees 14, 16 and 49 in this MOD 2025/0071.

We find it disappointing, but not surprising that a DA & MOD - with developers obviously pushing the boundaries of compliance to make greater profits - can encroach on significant trees on road reserves. Street trees belong to the community and the local fauna - and add to the beauty and amenity of the whole neighbourhood. Road reserve trees are covered by the Tree Canopy Plan and the draft Tree Management Policy, and these trees should not (per NBC policy) be removed to suit a private development. Replacing them with saplings (if at all) is not an equivalent trade-off for trees that are reaching their hollow-bearing years and provide shade and shelter to the community.

We will campaign rigorously for these street trees to be retained. These trees could be easily retained if the driveway hardstand was raised and not widened.



This DA and MOD needs to be rethought to retain more habitat trees overall. This area of significant [REDACTED] idors from Stapleton Reserve to Angophora Reserve - particularly as these blocks adjoin Toongari Reserve (located between these two significant reserves).

We note that there is a proposal to reduce the size of the planter space in the central courtyard. We object to this further reduction in the already-limited planting area.

DAs of this extreme bulk, scale and tree removal are all adding to the relentless gentrification and loss-of-character of our unique, canopy-rich suburb, known for its 'homes amongst the trees' featuring low key, native landscapes and informal often quirky architecture and rustic bush gardens.

Most residents value the capacity of our gardens and our suburb to provide habitat for wildlife. With developments of this size and (level of ecosystem) destruction, the areas where wildlife can thrive are diminishing to smaller and smaller pockets of unconnected bushlands where wildlife compete for fewer and fewer resources, often losing their corridors, water and nesting sites. Tree replanting of medium size shrubs or groundcovers does not replace habitat trees in the short term or the long term.

We also object to any proposed upsizing of the units listed, or increase to the size of any of the terraces in this already overscaled development. We also object to the increase in roof overhang in the north-west corner (bulk & scale objection).

Approving this MOD 2025/0017 will set concerning precedents for future builds, tree loss & encroachment. Council should be duty-bound by the Tree Canopy Plan and the Tree Management Policy to do whatever it takes to retain and protect more of the existing trees on this build and on the road reserve, and retain the full size of the existing DA planting areas in the central courtyard.

We are also concerned about the serious parking/transit problems on Central Road that will be exacerbated by this massive build (plus how this also affects street trees). Noting that Council and the developer are relying on old data which does not take into account the reduction in parking spaces on the street since the original DA.

Both Canopy Keepers and the community expect an increased level of support from Council to defend our tree canopy, which is under considerable pressure. This is not the first DA/MOD in our LGA that is removing more than 60 trees in the past couple of years. This is a worrying trend and one that requires special attention. Developers must be challenged to retain and develop within the natural environment, not raze it to the ground to maximise their gains - then push the envelope even further with modifications.





We again draw your attention to the enormous amount of work we have all done over close to a decade [REDACTED] Management Plan created and revised and implemented. By NBC not challenging this MOD, and NOT pressuring developers to compile and consider alternatives, all the Tree Canopy Plans and updated policies are simply words on a page. Not objecting to this MOD will erode further the community's trust and our belief that Council can adequately manage our greatest asset – our unique and rich biodiversity - our precious urban forest..

Please refuse this MOD 2025/0017 and its resulting tree, habitat and amenity loss.

This DA modification is not in the community's best interest.

Yours sincerely,

**Canopy Keepers Steering Committee**  
Here for the Trees

Kind regards,  
**Add name here**  
*Canopy Keepers*

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[www.canopykeepers.org.au](http://www.canopykeepers.org.au)

