
From: Emma Tonkin
Sent: 21/11/2025 8:58:31 AM
To: Council Northernbeaches Mailbox
Cc: Emma Tonkin
Subject: Attention DA Team Re DA2025/1570 Please confirm receipt of submission

Emma Tonkin
286 Lower Plateau Road
BILGOLA PLATEAU NSW 2107

Thursday 20 November, 2025

Re: DA2025/1570

Lot 11 DP 12838, 290 Lower Plateau Road, Bilgola Plateau

Development Assessment Team

Attention: Anne-Marie Young

Dear Ms Young,

Thank you for your time on the phone last Friday afternoon to discuss the above proposed Development Application. I wish to strongly object to this cookie-cutter, environmentally insensitive design and I ask that Council rejects the Application in its current form.

Executive Summary

There are several non-compliance issues with this Application and the basis of my objection is as follows:

This is a vacant and heavily vegetated site with extensive tree removal and excavation proposed: 24 trees are proposed to be removed (40% of the site), including 22 prescribed trees with only 7 native trees to be replanted. This is excessive and unacceptable. The environmental ramifications are irreversible and profound.

Excavation up to 5m in depth is proposed which is unnecessary and avoidable. A more environmentally sensitive design based on pier foundations would significantly reduce root incursions and reduce tree loss.

The bulk and scale of the proposed dwelling include significant breaches of the building envelope. I note that the upper floor is not setback from the side boundaries which is excessive and non-compliant.

1. Insufficient and Inaccurate Documentation

I refer to Council's request for further reports to be commissioned[\[1\]](#) along with particular reference to the Arborists Report[\[2\]](#) and that "A number of matters need to be addressed before the application can be supported:..."

The Arborist report contains numerous errors and requires clarifications as per above. It fails to consider the *totality of encroachment impacts*, some of which will be catastrophic. Removal of significant or endangered trees is inconsistent with the Pittwater DCP[3] principles of environmental preservation, landscape character and biodiversity protection.

I request that Council either place the Application on hold or extend the submission period until after the reports have been re-submitted and made available for community consultation.

2. Evidence-based Advocacy for Trees in Urban Design

I am requesting that Council ask the Applicant for a revision of the Arborists Report to include: *total tree by tree % encroachment* along with an indication of compliance with the Australian Standard[4].

For example, Tree 18, a magnificent *Angophora costata* has a cumulative encroachment impact (26%) [5] beyond acceptable standards, being classified as “Major >20% of NRZ or any encroachment into SRZ/ SRZ breach = automatically Major Detailed investigation; design alternatives must be explored; viability must be demonstrated.” [6]

This aspect of the “Tree Sensitive Design and Construction solution” to take adequate measures to protect the environment *have not been sufficiently prioritised* and therefore do not meet the Australian Standard. There are several other unacceptable encroachments to Cat A Trees (T28 is 36%!) which will inevitably lead to the death of the tree.

I have approached Council prior to the lodgement of this DA for assistance with T18’s protection (15/08/25), as the neighbouring block had been sold and the potential for its development seemed imminent. It, along with the exceptional rock outcrop must be protected at all costs.

Considering the unique and sensitive nature of the site, I ask that Council request the Applicant to provide:

An Ecological Site Assessment Report (ESA)

Biodiversity Impact Assessment (BIA) and

Ecological Sustainability Plan (ESP).

The below image taken 16/08/2024 depicts the abundant fauna on my block, and neighbouring Tree 18 adjacent to the sandstone outcrop.

Additionally, will Council please consider the implications to the third party (owner of 288 Lower Plateau Road) should Council approve this Application, and the tree is damaged or dies? Who bears this responsibility and accountability for compensation?



3. Environmental and Biodiversity Impacts

This design concept shows huge environmental disregard and completely contradicts Pittwater's DCP, LEP Guidelines and The EPA Act 1979. How can a proposal for the removal of over 40% of a virgin bushland block be considered as reasonable on any level?

This application should be refused for several biodiversity impact reasons, not limited to the absence of a Biodiversity Impact Assessment Report, Biodiversity Development Assessment Report, the irreversible and unacceptable loss of native bushland, rock outcrops, excessive tree loss, potential impact to Duffys Forest EEC, avoidance and minimisation of ecological impact, the threatened population implications and erosion impacts of the design.

4. Black cockatoos and Gliders

I have personally on numerous occasions witnessed the South Eastern Glossy Black-Cockatoo feed on the mature Casuarinas on my block and the neighbouring 288/290 (most recently on the morning of 13 August, 2025).

There is an endangered population of Squirrel Gliders on the Barrenjoey Peninsula. I refer Council to GIS Environmental Consultant's Report (objection lodged 19/11/25 online) in which evidence of Gliders were found in the immediate vicinity of this site.

I request that Council reject this Application as the removal or disturbance of native habitat trees and corridors would be likely to have a detrimental impact on this unique and sensitive ecological community.

5. Sterilisation of adjacent site: 288 Lower Plateau Road

I ask that Council consider the implications of the solar study depicted in Darren Campbell Architect's Shadow Diagram A902 (21 June at noon). Can Council confirm if the overshadowing of this block meets compliance requirements and the future environmental/loss of amenity implications?

6. Landslip

The surrounding land is zoned subject to Landslide. Pittwater's geography is quite different to Warringah's which is underlain by solid sandstone. Apparently, the shale underneath the sandstone makes it more prone to slippage and why so much of it is classified as unstable/landslide-prone. From experience, during periods of rain, a huge volume of water flows from the reserve above my block, flowing through the deeply gouged easement on 288 and onto Lower Plateau Road. The proposed 5m basement excavation and extensive tree loss could only potentially further compromise an already vulnerable area. See Annexure A* which depicts the landslide nearby on Lower Plateau Rd in March 2022.

7. Traffic and Parking

The section of Lower Plateau Road from 290 through 276 has parking permitted on both sides. It is often full (often residents from nearby Lower Plateau Road parking on this strip) as there is no permissible parking on the deeply curved sections of the road to the north and south.

Additionally, it is a very popular dog walking area, and as there is no footpath, pedestrians are sometimes forced to walk on the road, exposing them to speeding vehicles through this narrow section. I have previously written to Council regarding two-sided parking and these safety issues to no avail.

The approval of this application will exacerbate existing congestion and safety issues. In addition, it should be noted that the proposed Applicant's driveway is on a blind bend, and it would be in the community's safety interests that front-facing only exiting or a car turntable should be proposed as a condition of consent.

Please see Annexure B.

Conclusion and Request

Living in such an environmentally exquisite part of the world is something I have a profound appreciation for. My granddaughter gazes up with wonder at Tree 18^[Z]; the gnarly, twisted limbs and 12 metre canopy of the "Grandmother Angophora Tree". Our family cherish the opportunity to sit, listen and watch the hive of activity within and below the canopy...to witness these native birds and other inhabitants take shelter amongst the hollows of the trees is truly breathtaking.

Whilst I appreciate the reasonable development rights of the Applicant, my concerns and objections are significant as outlined above and I urge Council to reject this Application in its current form.

I would like to thank you for considering my submission.

Yours sincerely

Emma Tonkin

ANNEXURE A



Landslide March 2022, Lower Plateau Road, Bilgola Plateau

ANNEXURE B

Traffic Investigation - Request for No Parking - 286 Lower Plateau Road BILGOLA PLATEAU - TrP2024/01162

Linji Chen

[REDACTED]

Dear Emma Tonkin,

Apologies for the delay in the follow-up since our last conversation over the phone. Our team has inspected the traffic conditions on Lower Plateau Road, Bilgola Plateau. However, as I have explained, the road width and sightline conditions allow parking on both sides of the road while two-way traffic may pass through each other intermittently, which is a typical circumstance for such local roads.

The removal of parking not only reduces the available parking capacity where there are limited alternative options, but is also likely to encourage an increase in vehicle speed. Due to the associated safety concerns with higher vehicle speeds, Council does not propose to restrict parking to only one side of the road.

If you would like a footpath on Lower Plateau Road for better pedestrian safety, please make a separate request for new footpaths which will be considered together with the other similar requests in Northern Beaches.

Best regards,

Linji Chen

Acting Engineer - Traffic

Transport Network

[REDACTED]

[REDACTED]

northernbeaches.nsw.gov.au

[1] Natural Environmental Referral Response – Biodiversity: Northern Beaches Council, Dated 13/11/2025

[2] Arboricultural Impact Assessment Report: John Cruickshank and Jack Williams Urban Arbor Pty Ltd
Reference: 251010_290 Lower Plateau Rd, Dated 10/10/2025 Prepared for Carty Homes

[3] [Pittwater Local Environmental Plan 2014 - NSW Legislation](#)

[4] "Protection of Trees on Development Sites" AS 4970:2025

[5] Arboricultural Impact Assessment Report: John Cruickshank and Jack Williams Urban Arbor Pty Ltd
Reference: 251010_290 Lower Plateau Rd, Dated 10/10/2025 Prepared for Carty Homes
P14

[6] AS 4970:2025

[7] Concept Landscape Architects Landscape Plan Dated September 2025: "T18 =Angophora costata
16x12m Good Retain"