
From: GIS Environmental
Sent: 19/11/2025 1:14:33 PM
To: DA Submission Mailbox
Subject: Re: Submission Acknowledgment
Attachments: Skelton Objection DA20251570 290 Lower Plateau Rd.pdf; PastedGraphic-4.tiff;

45 Austin Ave, Dee Why 2099 Ph 02 9939 5129 Mob 041 943 8672 Web www.ecology.net.au

* Biodiversity Development Assessment Reports BDAR
* Biodiversity Assessment Method BAM
* Flora and Fauna Surveys
* Threatened Species Assessments
* Bushland Management Plans
* Assessments of Significance
* Ecological Monitoring & Compliance
* Review of Environmental Factors (REF)
* GIS Computer Mapping
* Court Expert Witness

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On 19 Nov 2025, at 1:11 pm, DASUB@northernbeaches.nsw.gov.au wrote:

19/11/2025

MR Nick Skelton
45 Austin AVE
Dee Why NSW 2099

RE: DA2025/1570 - 290 Lower Plateau Road BILGOLA PLATEAU NSW 2107

Dear Sir/Madam,

Thank you for your submission in respect of the above-mentioned property. Please be reminded that under provision of the Government Information Public Access Act, all submissions will be posted on Council's Website against the application.

The matters that you have raised will be noted and taken into consideration in the assessment of the proposal process. However, please note as previously stated in the notification letter, Council will not enter into correspondence in respect of any submission due to the large number of submissions Council receives annually.

Should you wish to monitor the progress of this development application, please feel free to visit the Planning and Development section of Council's Website at www.northernbeaches.nsw.gov.au.

We thank you for your submission and should you have any queries, please do not hesitate to contact Council on 1300 434 434.

Yours faithfully

Northern Beaches Council

For your reference please find below a copy of your submission:

Northern Beaches Council
725 Pittwater Rd, Dee Why
Anne-Marie Young, Planner

19th November 2025

Re: Objection to DA2025/1570 at 290 Lower Plateau Road Bilgola on Biodiversity grounds

Dear Council Planning Officer,

This application should be refused due to the absence of a Biodiversity Assessment Report and the excessive impact to biodiversity values that this design would cause.

This property contains very high biodiversity values due to the presence of native bushland, Threatened species habitat, such as tree hollows, and rock features. This site is likely to be significantly important habitat for several Threatened species and an endangered ecological community, as outlined below.

Qualifications and Experience of the Author

I am a professional ecological consultant with 25 years' experience as well as a qualified BAM assessor. I have a B. Sc. Hons in Ecology from Sydney University and a Masters in Vegetation Management from UNSW. I have written over 900 ecology reports for DAs throughout Sydney and I regularly assess DA application for several Councils and Local Planning Panels.

This Development Application should be refused for several biodiversity impact reasons, including:

1. Absence of a required Biodiversity Assessment

The Development Application proposal (DA2025/1570) does not include the required biodiversity impact assessment report to assess the ecological impact of the proposal and inform the decision-making process. The site is undeveloped and covered in native bushland habitat that has very high ecological values. A decision regarding the application on this site cannot be made in the absence of an appropriate ecologists' report that addresses the matters of consideration in section 4.15 EP&A Act 1979 and section 1.7.

The Biodiversity Conservation Act (sections 1.3, 1.7, 4.5 Part 6, 7.2 - 7.4, 7.5, 7.7 and s7.13(6) and the BC Act Regulation) requires that the determining Authority take into consideration which measures are required in relation to avoiding and minimising impacts to Biodiversity Values. There is extensive caselaw on what is sufficient Avoidance and Minimisation and how it is to be documented. It is

essential that the decision maker has the benefit of an appropriate biodiversity impact report to assess the likely impact of the proposal.

2. Need for a Biodiversity Development Assessment Report (BDAR)

Sections 7.2 to 7.4 of the Biodiversity Conservation Act 2017 requires that all Development Applications have a Threshold test applied to determine if a BDAR assessment report is required to accompany the application. No Threshold test has been applied to this proposal.

When a Threshold Test including a 5 part test is applied it is concluded that the proposal is likely to have a Significant impact on Duffys Forest EEC, the Squirrel Glider Population, the Squirrel Glider species and a BDAR report is required.

According to the Biodiversity Conservation Act 2016 and the Environmental Planning and Assessment Act 1979, Council is required to consider whether the proposed development is likely to have a significant impact (Section 7.3). Once impact minimisation and avoidance have been undertaken, then offsetting can be used as part of the mitigation of the residual impacts of the proposal on the environment.

3. Unacceptable loss of native bushland and rock features

The property 290 Lower Plateau Road, Bilgola is dominated by extensive endangered remnant native vegetation. The proposal (DA2025/1570) will remove nearly all the native vegetation and rock features from the 800 sqm property due to the house driveway, proposed excavation and landscaping. This is not consistent with the requirement of Section 4.15(1)(a)(i) of the Environmental Planning and Assessment Act 1979

In particular LEP and DCP LEP Part 7 Cl 7.6

7.6 Biodiversity

(1) The objective of this clause is to maintain terrestrial, riparian and aquatic biodiversity by-

- (a) protecting native fauna and flora, and
- (b) protecting the ecological processes necessary for their continued existence, and
- (c) encouraging the conservation and recovery of native fauna and flora and their habitats.

(2) This clause applies to land identified as "Biodiversity" on the Biodiversity Map.

(3) Before determining a development application for development on land to which

this clause applies, the consent authority must consider-

(a) whether the development is likely to have-

9(i) any adverse impact on the condition, ecological value and significance of the fauna

and flora on the land, and

(ii) any adverse impact on the importance of the vegetation on the land to the habitat

and survival of native fauna, and

(iii) any potential to fragment, disturb or diminish the biodiversity structure, function and composition of the land, and

(iv) any adverse impact on the habitat elements providing connectivity on the land, and

(b) any appropriate measures proposed to avoid, minimise or mitigate the impacts of

the development.

(4) Development consent must not be granted to development on land to which this

clause applies unless the consent authority is satisfied that-

(a) the development is designed, sited and will be managed to avoid any significant

adverse environmental impact, or

(b) if that impact cannot be reasonably avoided by adopting feasible alternatives-the

development is designed, sited and will be managed to minimise that impact, or

(c) if that impact cannot be minimised-the development will be managed to mitigate

that impact.

NBC's DRAFT LEP

Under Bushland and Biodiversity Land, NBC states:

The clause aims to protect and conserve native fauna and flora on specific land identified on the Terrestrial Biodiversity Map across the LGA.

The key objectives of the clause are to:

- o Protect native fauna and flora and the ecological processes necessary for their continued existence.

- o The clause aims to protect and conserve native fauna and flora on specific land identified on the Terrestrial Biodiversity Map across the LGA.

DCP

B4.1 Flora and Fauna Conservation Category 1 Land

- o B4.2 Flora and Fauna Conservation Category 1 and Wildlife Corridor

- o B4.6 Wildlife Corridors

Outcomes

The long-term viability of locally native flora and fauna and their habitats in the Pittwater Local Government Area.

Controls

Development shall not directly negatively impact on threatened species, endangered

populations or endangered ecological communities; Development shall retain and enhance habitat for locally native species, threatened species, endangered

populations or endangered ecological communities; Development shall result in no significant onsite loss of canopy cover and no net loss in native canopy trees;

Development shall ensure that at least 80% of any new planting incorporates native

vegetation (as per species listed in Native Plants for Your Garden available on the Pittwater Council website). Landscaping is to be outside areas of core bushland and

not include environmental weeds.

The proposed extent of vegetation clearing is excessive, unnecessary and is not consistent with the LEP/DCP or the EP&A Act 1979.

The site also contains at least two significantly large rocks (Donovan Associates Survey 12/12/2024) and scattered bush rock throughout the property. The LEP states that the development must avoid the removal of rock features where possible, and this has not been successfully executed in the existing development proposal.

The proposal is for a cut and fill development on a steep slope that will have a significant impact on the site and adjacent trees. See Drawing A202 (Darren Campbell Architecture Master Set).

It is recommended that the house should be designed to have a minimal impact and be built as a suspended building, rather than cut into the slope, to avoid unnecessary removal of trees and minimise the impact of the development on biodiversity values.

4. Avoidance and Minimisation of Impact

Chapter 7 of the BAM under the Biodiversity Conservation Act (2016) requires that all development applications adequately Avoid and Minimise ecological impact.

The current proposal (DA2025/1570) will remove nearly all of the native vegetation and rock features from the 800 sqm property due to the house driveway, proposed excavation and landscaping.

The bulk, scale, location, footprint and construction design in this proposal removes an excessive number of trees and bushland habitat and does not avoid and minimise ecological impact as is required and should be refused.

5. Impact to the Threatened Duffy Forest EEC, Endangered Ecological Community

The property contains 800 sqm of the Threatened Ecological Community known as Duffys Forest EEC, nearly all of which will be removed by this proposal. The site is dominated by native shrubs and ground cover plants which contribute to the existing ecological community. Alternative designs that would reduce the impact of a house and landscaping on the Duffys Forest TEC on the site and adjacent habitat are available.

6. Excessive Tree Loss

There are 62 native trees surveyed by the Arboricultural Impact Assessment Report (Urban Arbors Pty Ltd 10/10/2025) on and immediately adjacent to the property. The report concludes that 24 trees will need to be removed and 7 additional trees will be significantly impacted as a result of the development and will need a high level of intervention measures to try to retain these additional trees. It is likely that more trees will be removed due to the cut and fill needed for the development.

Table 1. Trees identified to be removed in the Arborist Report (Urban Arbor 10/10/25)

Tree Number	Scientific Name	Common Name	Retain or Remove	Height off Ground (m)	Arborist Category
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T27	Angophora costata	Smooth Barked Apple	Remove	9m	A
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T31	Corymbia gummifera	Red Bloodwood	Remove	8m	A
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T35	Corymbia gummifera	Red Bloodwood	Remove	9m	A
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T62	Angophora costata	Smooth Barked Apple	Remove	7m	A
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T30	Angophora costata	Smooth Barked Apple	Remove	7m	Z1
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T33	Corymbia gummifera	Red Bloodwood	Remove	6m	Z1
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T14 Eucalyptus resinifera Red Mahogany Remove 7m Z4
T17 Allocasuarina littoralis Black She Oak Remove 8m Z10
T24 Angophora costata Smooth Barked Apple Remove 9m Z10
T32 Corymbia gummifera Red Bloodwood Remove 8m Z1
T34 Allocasuarina littoralis Black She Oak Remove 8m Z4
T37 Corymbia maculata Spotted Gum Remove 8m Z1
T44 Angophora costata Smooth Barked Apple Remove 9m Z10
T45 Eucalyptus reticulatus Blueberry Ash Remove 6m Z11
T51 Allocasuarina littoralis Black She Oak Remove 3m Z6
T52 Angophora costata Smooth Barked Apple Remove 7m Z10
T60 Angophora costata Smooth Barked Apple Remove 6m Z1

Additional native trees that will have significant root incursion and are unlikely to be able to be retained but will be attempted to be retained are:

Tree 10
Tree 11
Tree 18
Tree 28
Tree 29
Tree 46 and
Tree 57

There are also several dead trees on the site which have not been surveyed by the arborist, and which are likely to be important habitat for threatened species. These additional trees need to be shown on the arborist plans and tables and included in the conclusions.

It is highly likely that T18, a very large and majestic Sydney Red Angophora (Angophora Costata), will be significantly impacted by the proposed excavation of the site and will not survive this proposal. This tree (T18), and others such as T41 and T46, are not on the property of the developer and are likely to be impacted by the development.

7. Habitat value of the trees proposed to be removed

There are several dead trees which are important habitat for a range of threatened fauna. There are also over 20 tree hollows on the site (See Photos 1-4), which are critical habitat for arboreal mammals, such as Squirrel Gliders, and cannot be easily replaced.

The trees also form an important canopy for arboreal species and is part of a wildlife corridor to Newport Heights Reserve above and between adjacent properties. There are also particularly important chimney hollows on properties immediately adjacent to the site, which may accommodate Threatened owls.

8. Threatened Squirrel Gliders

Squirrel Gliders are both a Threatened species and a Threatened Population on this site. The Endangered Population of Squirrel Gliders has been determined on the Barrenjoey Peninsula north of Bushrangers Hill (See Appendix A: NSW

Scientific Determination, 1996).

Threatened Squirrel Gliders have been found in the immediate vicinity of this site.

Gliders were found on the adjacent property this week see photos attached. There are also anecdotal records from local residents confirm sightings of Squirrel Gliders in the vicinity, and a deceased individual was reportedly found in Loombah Street, Bilgola Plateau, in late 2017 (see Photo 6).

9. Gliders were recorded on the adjacent property this week

Motion detecting cameras were placed on the adjacent property 286 Lower Plateau Rd between the 12th and 18th of November 2025, at the request of the property's owner, Emma Tonkin.

The results showed that Gliders were recorded on video on 4 nights in two different trees. Still images from these cameras are shown on photo page 2, attached.

The videos of these Gliders are available on request. The location of their nesting hollow is not known but may be in or near to the subject property. The proposal will remove trees and habitat that is known to be important Glider habitat.

10. Importance of the site for other Threatened species

It is very likely that the site is important habitat for Threatened microbats such as Eastern Cave Bat, Bent Wing Bats, large-eared Pied Bat.

There are also several Glossy Black Cockatoo (*Calyptorhynchus lathami lathami*) food trees, such as *Allocasuarina littoralis* on the site and this Threatened species is known to occur in the area. Retaining as many Glossy Black Cockatoo food trees on this site as possible is essential for protecting this threatened species that depends heavily on mature *Casuarina* (She-Oak) trees for both food and nesting. These cockatoos feed almost exclusively on the seeds of she-oaks and require hollow-bearing eucalypts for nesting, and the loss of these trees directly reduces their food supply and breeding opportunities. By preserving existing trees and maintaining continuous canopy cover, the development could ensure the survival of this iconic bird, support biodiversity, and sustain the ecological balance that makes Bilgola's natural environment so distinctive.

The Glossy Black-Cockatoo, once widespread across south-eastern Australia, has experienced a significant contraction in range and population due mainly to habitat loss and fragmentation. In New South Wales, including the Sydney basin and coastal zones, such as Bilgola, relatively large areas of suitable habitat were historically present, and records show the species in the region. Therefore, in Bilgola and its surrounding coastal woodlands, retaining trees is not just desirable but critical: it helps protect one of the few remaining coastal habitats in which these specialised birds may persist, offering hope that local populations might continue rather than disappear altogether.

There are also particularly important chimney hollows on properties immediately adjacent to the site, which may accommodate Threatened owls.

11. Erosion potential of the land

The land has a slope of more than 14° and is fundamentally unsuitable for cut and

fill excavation proposed. The amount of fill produced is excessive and is not consistent with the LEP. The amount of collateral impact due to sedimentation is unacceptable.

12. Public consultation of any new ecologist report

Due to the high biodiversity values on this site and the extensive public interest, it is requested that, if a Ecologists report is submitted with the proposal then the period of public consultation should be reopened to allow public comment.

If the house construction type is changed then there should also be further public consultation.

13. Timing of public consultation

Due to the likely need to withdraw the application due to:

- Change of design to reduce excavation and tree impact
- The absence of the biodiversity report

It is requested that the time for public consultation for submissions for any new application that may be submitted not be in the period over the Christmas break to allow submissions from the large number of interested parties.

Conclusion

These values clearly warrant a comprehensive ecological assessment prior to any development being considered.

There is clear evidence that the site is important foraging habitat for Squirrel Gliders and is part of an already threatened habitat extent for an endangered population and species and may contain nesting hollows for Squirrel Gliders. The removal or modification of mature habitat trees within or adjacent to the site would therefore likely result in direct and significant impacts on local biodiversity and the ongoing persistence of Squirrel Glider populations within the Northern Beaches.

Accordingly, I respectfully request that Council:

1. Refuse or defer determination of the current Development Application
2. Require a detailed biodiversity and habitat assessment is undertaken by a suitably qualified and experienced ecologist;
3. A BDAR report is required
4. A Bushland Management Plan and appropriate conditions of consent are required to describe how the property will be managed to avoid an minimise impact to biodiversity value in perpetuity and
5. Protect and retain a greater proportion of existing habitat trees and associated native vegetation within and adjoining the site to maintain ecological connectivity and the viability of local wildlife populations.

The Northern Beaches supports a mosaic of unique and sensitive ecological communities that require careful management and protection. Approving development in the absence of adequate environmental assessment risks irreversible biodiversity loss and the fragmentation of critical wildlife corridors fundamental to the region's ecological integrity.

Thank you for considering this submission. I trust that Council will give due weight to these concerns and take appropriate action to ensure the protection of this important habitat.

If you would like any further clarification on the works described above, please contact me on [REDACTED]

Yours sincerely,

Nicholas Skelton - [REDACTED]

45 Austin Ave, North Curl Curl

Attachments:

- Photo Page
- Scientific determination for Squirrel Glider Population on Barrenjoey peninsular north of Bushrangers Hill in Northern Beaches Council

Northern Beaches Council

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Northern Beaches Council
725 Pittwater Rd, Dee Why
Anne-Marie Young, Planner

19th November 2025

Re: Objection to DA2025/1570 at 290 Lower Plateau Road Bilgola on Biodiversity grounds

Dear Council Planning Officer,

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This property contains **very high biodiversity values** due to the presence of native bushland, Threatened species habitat, such as tree hollows, and rock features. This site is likely to be significantly important habitat for several Threatened species and an endangered ecological community, as outlined below.

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This Development Application should be refused for several biodiversity impact reasons, including:

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In particular LEP and DCP LEP Part 7 Cl 7.6

7.6 Biodiversity

(1) The objective of this clause is to maintain terrestrial, riparian and aquatic biodiversity by—

- (a) protecting native fauna and flora, and*
- (b) protecting the ecological processes necessary for their continued existence, and*
- (c) encouraging the conservation and recovery of native fauna and flora and their habitats.*

(2) This clause applies to land identified as "Biodiversity" on the Biodiversity Map.

(3) Before determining a development application for development on land to which this clause applies, the consent authority must consider—

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9(i) any adverse impact on the condition, ecological value and significance of the fauna and flora on the land, and

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(c) if that impact cannot be minimised—the development will be managed to mitigate that impact.

NBC's DRAFT LEP

Under *Bushland and Biodiversity Land*, NBC states:

The clause aims to protect and conserve native fauna and flora on specific land identified on the Terrestrial Biodiversity Map across the LGA.

The key objectives of the clause are to:

- o Protect native fauna and flora and the ecological processes necessary for their continued existence.

- o The clause aims to protect and conserve native fauna and flora on specific land identified on the Terrestrial Biodiversity Map across the LGA.

DCP

B4.1 Flora and Fauna Conservation Category 1 Land

o B4.2 Flora and Fauna Conservation Category 1 and Wildlife Corridor

o B4.6 Wildlife Corridors

Outcomes

The long-term viability of locally native flora and fauna and their habitats in the Pittwater Local Government Area.

Controls

Development shall not directly negatively impact on threatened species, endangered populations or endangered ecological communities; Development shall retain and enhance habitat for locally native species, threatened species, endangered populations or endangered ecological communities; Development shall result in no significant onsite loss of canopy cover and no net loss in native canopy trees; Development shall ensure that at least 80% of any new planting incorporates native vegetation (as per species listed in Native Plants for Your Garden available on the Pittwater Council website). Landscaping is to be outside areas of core bushland and not include environmental weeds.

The proposed extent of vegetation clearing is excessive, unnecessary and is not consistent with the LEP/DCP or the EP&A Act 1979.

The site also contains at least two significantly large rocks (Donovan Associates Survey 12/12/2024) and scattered bush rock throughout the property. The LEP states that the development must avoid the removal of rock features where possible, and this has not been successfully executed in the existing development proposal.

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5. Impact to the Threatened Duffy Forest EEC, Endangered Ecological Community

The property contains 800 sqm of the Threatened Ecological Community known as Duffys Forest EEC, nearly all of which will be removed by this proposal. The site is dominated by native shrubs and ground cover plants which contribute to the existing ecological community. Alternative designs that would reduce the impact of a house and landscaping on the Duffys Forest TEC on the site and adjacent habitat are available.

6. Excessive Tree Loss

There are 62 native trees surveyed by the Arboricultural Impact Assessment Report (Urban Arbors Pty Ltd 10/10/2025) on and immediately adjacent to the property. The report concludes that 24 trees will need to be removed and 7 additional trees will be significantly impacted as a result of the development and will need a high level of intervention measures to try to retain these additional trees. It is likely that more trees will be removed due to the cut and fill needed for the development.

Table 1. Trees identified to be removed in the Arborist Report (Urban Arbor 10/10/25)

Tree Number	Scientific Name	Common Name	Retain or Remove	Height off Ground (m)	Arborist Category
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T25	Angophora costata	Smooth Barked Apple	Remove	9m	A
T26	Angophora costata	Smooth Barked Apple	Remove	9m	A
T27	Angophora costata	Smooth Barked Apple	Remove	9m	A
T31	Corymbia gummifera	Red Bloodwood	Remove	8m	A
T35	Corymbia gummifera	Red Bloodwood	Remove	9m	A
T59	Angophora costata	Smooth Barked Apple	Remove	7m	A
T62	Angophora costata	Smooth Barked Apple	Remove	7m	A
T30	Angophora costata	Smooth Barked Apple	Remove	7m	Z1
T33	Corymbia gummifera	Red Bloodwood	Remove	6m	Z1
T14	Eucalyptus resinifera	Red Mahogany	Remove	7m	Z4
T17	Allocasuarina littoralis	Black She Oak	Remove	8m	Z10
T24	Angophora costata	Smooth Barked Apple	Remove	9m	Z10
T32	Corymbia gummifera	Red Bloodwood	Remove	8m	Z1
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T44	Angophora costata	Smooth Barked Apple	Remove	9m	Z10
T45	Eucalyptus reticulatus	Blueberry Ash	Remove	6m	Z11
T51	Allocasuarina littoralis	Black She Oak	Remove	3m	Z6
T52	Angophora costata	Smooth Barked Apple	Remove	7m	Z10
T60	Angophora costata	Smooth Barked Apple	Remove	6m	Z1

Additional native trees that will have significant root incursion and are unlikely to be able to be retained but will be attempted to be retained are:

Tree 10
Tree 11
Tree 18
Tree 28
Tree 29
Tree 46 and
Tree 57

There are also several dead trees on the site which have not been surveyed by the arborist, and which are likely to be important habitat for threatened species. These additional trees need to be shown on the arborist plans and tables and included in the conclusions.

It is highly likely that T18, a very large and majestic Sydney Red Angophora (*Angophora Costata*), will be significantly impacted by the proposed excavation of the site and will not survive this proposal. This tree (T18), and others such as T41 and T46, are not on the property of the developer and are likely to be impacted by the development.

7. Habitat value of the trees proposed to be removed

There are several dead trees which are important habitat for a range of threatened fauna. There are also over 20 tree hollows on the site (See Photos 1-4), which are critical habitat for arboreal mammals, such as Squirrel Gliders, and cannot be easily replaced.

The trees also form an important canopy for arboreal species and is part of a wildlife corridor to Newport Heights Reserve above and between adjacent properties. There are also particularly important chimney hollows on properties immediately adjacent to the site, which may accommodate Threatened owls.

8. Threatened Squirrel Gliders

Squirrel Gliders are both a Threatened species and a Threatened Population on this site. The Endangered Population of Squirrel Gliders has been determined on the Barrenjoey Peninsula north of Bushrangers Hill (See Appendix A: NSW Scientific Determination, 1996).

Threatened Squirrel Gliders have been found in the immediate vicinity of this site.

Gliders were found on the adjacent property this week see photos attached.

There are also anecdotal records from local residents confirm sightings of Squirrel Gliders in the vicinity, and a deceased individual was reportedly found in Loombah Street, Bilgola Plateau, in late 2017 (see Photo 6).

9. Gliders were recorded on the adjacent property this week

Motion detecting cameras were placed on the adjacent property 286 Lower Plateau Rd between the 12th and 18th of November 2025, at the request of the property's owner, Emma Tonkin.

The results showed that Gliders were recorded on video on 4 nights in two different trees. Still images from these cameras are shown on photo page 2, attached.

The videos of these Gliders are available on request. The location of their nesting hollow is not known but may be in or near to the subject property. The proposal will remove trees and habitat that is known to be important Glider habitat.

10. Importance of the site for other Threatened species

It is very likely that the site is important habitat for Threatened microbats such as Eastern Cave Bat, Bent Wing Bats, large-eared Pied Bat.

There are also several Glossy Black Cockatoo (*Calyptorhynchus lathami lathami*) food trees, such as *Allocasuarina littoralis* on the site and this Threatened species is known to occur in the area. Retaining as many Glossy Black Cockatoo food trees on this site as possible is essential for protecting this threatened species that depends heavily on mature *Casuarina* (She-Oak) trees for both food and nesting. These cockatoos feed almost exclusively on the seeds of she-oaks and require hollow-bearing eucalypts for nesting, and the loss of these trees directly reduces their food supply and breeding opportunities. By preserving existing trees and maintaining continuous canopy cover, the development could ensure the survival of this iconic bird, support biodiversity, and sustain the ecological balance that makes Bilgola's natural environment so distinctive.

The Glossy Black-Cockatoo, once widespread across south-eastern Australia, has experienced a significant contraction in range and population due mainly to habitat loss and fragmentation. In New South Wales, including the Sydney basin and coastal zones, such as Bilgola, relatively large areas of suitable habitat were historically present, and records show the species in the region. Therefore, in Bilgola and its surrounding coastal woodlands, retaining trees is not just desirable but critical: it helps protect one of the few remaining coastal habitats in which these specialised birds may persist, offering hope that local populations might continue rather than disappear altogether.

There are also particularly important chimney hollows on properties immediately adjacent to the site, which may accommodate Threatened owls.

11. Erosion potential of the land

The land has a slope of more than 14° and is fundamentally unsuitable for cut and fill excavation proposed. The amount of fill produced is excessive and is not consistent with the LEP. The amount of collateral impact due to sedimentation is unacceptable.

12. Public consultation of any new ecologist report

Due to the high biodiversity values on this site and the extensive public interest, it is requested that, if a Ecologists report is submitted with the proposal then the period of public consultation should be reopened to allow public comment.

If the house construction type is changed then there should also be further public consultation.

13. Timing of public consultation

Due to the likely need to withdraw the application due to:

- Change of design to reduce excavation and tree impact
- The absence of the biodiversity report

It is requested that the time for public consultation for submissions for any new application that may be submitted not be in the period over the Christmas break to allow submissions from the large number of interested parties.

Conclusion

These values clearly warrant a comprehensive ecological assessment prior to any development being considered.

There is clear evidence that the site is important foraging habitat for Squirrel Gliders and is part of an already threatened habitat extent for an endangered population and species and may contain nesting hollows for Squirrel Gliders.

The removal or modification of mature habitat trees within or adjacent to the site would therefore likely result in direct and significant impacts on local biodiversity and the ongoing persistence of Squirrel Glider populations within the Northern Beaches.

Accordingly, I respectfully request that Council:

1. Refuse or defer determination of the current Development Application
2. Require a detailed biodiversity and habitat assessment is undertaken by a suitably qualified and experienced ecologist;
3. A BDAR report is required
4. A Bushland Management Plan and appropriate conditions of consent are required to describe how the property will be managed to avoid an minimise impact to biodiversity value in perpetuity and
5. Protect and retain a greater proportion of existing habitat trees and associated native vegetation within and adjoining the site to maintain ecological connectivity and the viability of local wildlife populations.

The Northern Beaches supports a mosaic of unique and sensitive ecological communities that require careful management and protection. Approving development in the absence of adequate environmental assessment risks irreversible biodiversity loss and the fragmentation of critical wildlife corridors fundamental to the region's ecological integrity.

Thank you for considering this submission. I trust that Council will give due weight to these concerns and take appropriate action to ensure the protection of this important habitat.

If you would like any further clarification on the works described above, please contact me on [REDACTED]

Yours sincerely,

[REDACTED]

45 Austin Ave, North Curl Curl

Attachments:

- Photo Page
- Scientific determination for Squirrel Glider Population on Barrenjoey peninsular north of Bushrangers Hill in Northern Beaches Council

Photo Page 1 - Site Features



Photo 1. Photo of several Hollows, looking North (12/11/2025)



Photo 2. Photo of medium sized Tree Hollow (12/11/2025)



Photo 3. Photo of small Tree Hollow (12/11/2025)



Photo 4. T18 (*Angophora Costata*) with Hollows (12/11/2025)



Photo 5. Screenshot of Glider during Fauna Survey on Adjacent Site (15/11/2025)



Photo 6. Photo of Dead Glider found in a yard on Loombah Avenue, Bilgola (Late 2017)

Photo Page 2 - Gliders recorded during Fauna Survey (12/11/25-18/11/25)



Photo 1. Screenshot of Glider on Adjacent Site (12/11/2025)



Photo 2. Screenshot of Glider on Adjacent Site (12/11/2025)



Photo 3. Screenshot of Glider during Fauna Survey on Adjacent Site (14/11/2025)



Photo 4. Screenshot of Glider during Fauna Survey on Adjacent Site (15/11/2025)



Photo 5. Screenshot of Glider during Fauna Survey on Adjacent Site (15/11/2025)



Photo 6. Screenshot of Glider during Fauna Survey on Adjacent Site (15/11/2025)



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Squirrel Glider on Barrenjoey Peninsula, north of Bushrangers Hill - profile

Scientific name: *Petaurus norfolcensis* - endangered population

Conservation status in NSW:
Endangered Population

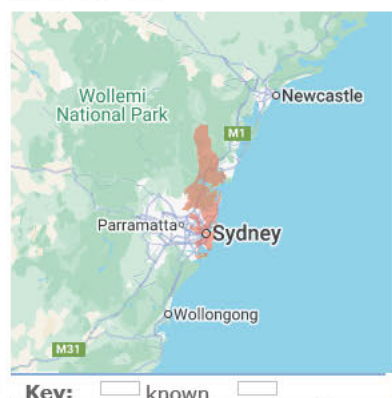
Commonwealth status: **Not listed**

Gazetted date: 06 Sep 1996
Profile last updated: 13 Nov 2024

Description

A nocturnal mammal, very similar to the more common and smaller Sugar Glider. However, the Squirrel Glider has a longer more pointed face, longer and narrower ears and a bushier tail. Fur is blue-grey to brown-grey above and white or cream below. A distinctive dark mid-dorsal stripe which extends from between the eyes to the mid back. Tail is bushy and is covered with grey to black fur. Vocalisation is a deep and throaty gurgling chatter.

Indicative distribution



The areas shown in pink and purple are the sub-regions where the species or community is known or predicted to occur. They may not occur throughout the sub-region but may be restricted to certain areas. ([click here](#) to see geographic restrictions). The information presented in this map is only indicative and may contain errors and omissions.

Distribution

Occurs in eastern Australia extending from north eastern Queensland through eastern NSW and down through northern and central Victoria. The endangered population is within the Pittwater Local Government Area on the Barrenjoey Peninsula, north of Bushrangers Hill.

Habitat and ecology

- NSW: occurs on the coast in a range of habitats including low scrubby eucalypt woodlands and banksia thickets to tall, wet eucalypt forests bordering on rainforest .
- The availability of a year-round supply of carbohydrates (nectar, sap, gum, and honeydew) appears to be an important habitat feature. In NSW, this corresponds to a high diversity of tree and shrub species, including a high nectar producing species and one or more winter flowering species.
- In Pittwater, important food sources are likely to be the winter flowering Coast Banksia (*Banksia integrifolia*) and Spotted Gum (*Corymbia maculata*) and the summer flowering Old Man Banksia (*B. serrata*) and Grey Ironbark (*Eucalyptus paniculata*). Other likely food sources include *Angophora costata*, *Banksia spinulosa*, *Corymbia gummiifera*, *Eucalyptus botryoides*, *E. punctata*, *E. robusta*, *Melaleuca quinquernervia*, mistletoes and *Xanthorrhoea* species.
- This animal will gouge and lick incisions on the trunks and main branches of *Eucalyptus*, *Corymbia* and *Angophora* trees to feed on sap and on *Acacia* trees and shrubs to feed on gum, especially when nectar is in short supply.

- Tree hollows are an important habitat feature providing den sites for raising young. Hollows can be found in trees of the following genera *Eucalyptus*, *Corymbia* and *Angophora*. Other species such as *Melaleuca quinquenervia* can also provide suitable hollows.
- A family group consists of 2-9 individuals, one male and at least two adult females and their dependent offspring, which shelter by day and breed in leaf lined nests in tree hollows. Litter size is one to two and the young remain in the pouch for about 70 days, after which they stay in the nest for another 30 days, and are weaned at four months.
- Births may occur throughout the year, usually with peak in winter. Most females exhibit the capacity to raise two litters per year. Young gliders disperse at a mean age of 12.5 months.

Regional distribution and habitat

Click on a region below to view detailed distribution, habitat and vegetation information.

- **Sydney Basin**

Threats

- Habitat loss, modification and fragmentation due to urban development.
- Predation by cats, dogs, and foxes.
- Death or injury by fire and motor vehicles.

Recovery strategies

A Saving Our Species conservation project is currently being developed for this species and will be available soon. For information on how you can contribute to this species' recovery, see the Activities to assist this species section below.

Activities to assist this species

- Control of predators (dog, cat, & fox).
- Protect areas of known and potential habitat from clearing and further fragmentation.
- Habitat enhancement by planting key feed and habitat trees.
- Restore degraded habitat using bush regeneration techniques.
- Maintain and enhance wildlife corridors.
- Rehabilitation of sick, injured or orphaned animals.

Information sources

- NSW Scientific Committee (1996) Squirrel glider population, Barrenjoey Peninsula - Endangered population determination - final. DEC (NSW), Sydney.
- Quinn D.G. (1995) Population Ecology of the Squirrel Glider (*Petaurus norfolcensis*) and the Sugar Glider (*P. breviceps*) (Marsupialia: Petauridae) at Limeburners Creek, on the Central North Coast of New South Wales. Wildlife Research 22: 471-505.
- Sharpe D.J. and Goldingay, R.L. (1998) Feeding behaviour of the squirrel glider at Bungawalbri Nature Reserve, north-eastern New South Wales. Wildlife Research 25: 243-254.
- Smith, P. and Smith, J. (2000) Management Plan for threatened fauna and flora in Pittwater. Report to Pittwater Council. P & J Smith Ecological Consultants, Blaxland.
- Suckling, G.C. (1995) Squirrel Glider *Petaurus norfolcensis*. Pp. 234-5 in Strahan, R. (ed.) The Mammals of Australia. Reed Books, Chatswood.

