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13/05/2025

MR Matthew Field
10 Yarrabee PL
Bilgola Plateau NSW 2107
[REDACTED]

RE: REV2025/0005 - 337 Lower Plateau Road BILGOLA PLATEAU NSW 2107

Dear Maxwell Duncan

As long-standing residents of Bilgola Plateau, we once again wish to register our strong objection to Development Application DA2024/0303, which proposes the demolition of a single dwelling, removal of 65 trees, and subdivision of the land into three lots at 337 Lower Plateau Road.

We reside at 10 Yarrabee Place, a property that directly borders the subject site, and we are gravely concerned by the scale and intensity of the proposed development. This application, even in its amended form, remains excessive, environmentally destructive, and at opposition for the character of the area.

1. Excessive Scale of the Development

It is entirely disproportionate to demolish one dwelling and replace it with three dwellings on land zoned C4 Environmental Living. This zoning exists to ensure that any development is environmentally sensitive, consistent with the surrounding landscape and community values.

- The scale of this proposal will triple traffic, noise, and hard surface coverage;
- It undermines Clause A4.3 of the Pittwater 21 DCP, which sets the character for Bilgola Plateau as a bushland suburb with limited built form;
- It introduces urban-style subdivision, disrupting the ecological and social character of the street.

2. Destruction of Tree Canopy - 65 Trees to Be Removed

While we acknowledge the amended proposal reduces tree removal from 93 to 65, this remains an extraordinarily high number, particularly for a sensitive bushland lot that provides a wildlife corridor to native animals. Among the trees proposed for removal are numerous prescribed trees:

Trees 50, 96, 97, 99, 101, 101A, 103A, 108, 139, 257, 260, and 261.

Most notably, Tree 97 (*Angophora costata*) is classified as High Retention Value. This classification is legally and environmentally significant. It indicates the tree is essential to slope stability, ecological continuity, and wildlife habitat. Its removal directly contradicts the

principles of sustainable development, NBC's own environmental planning controls, and community expectations for protection of native flora.

3. Inadequate Tree Replacement Conditions

Council's proposal to replace the lost canopy with just three (3) native canopy trees, each reaching a mature height of 8.5 metres, is grossly insufficient in light of the 65 being removed. Moreover, native canopy trees can take decades to reach maturity. We request that Council require a minimum planting height of 3 metres for replacement trees and request that this number be increased to at least 10 to ensure rapid establishment and at least some interim restoration of canopy and ecological function.

4. Proposed Screening Buffer to Protect Neighbouring Amenity

As adjoining residents, we will lose the natural buffer that currently provides privacy and acoustic protection. With the removal of trees and the construction of three dwellings, the residential amenity of 10, 9, 8, and 11 Yarrabee Place will be severely impacted. To mitigate this, we propose that Council require the developer to establish a planted fence line of native trees/shrubs along the boundary adjoining Yarrabee Place to a minimum planted height of 4 metres, using fast-growing native screening species. This is consistent with DCP controls relating to visual and acoustic privacy and reflects the site's zoning intent to preserve the outlook and amenity of neighbouring lots.

5. Wildlife Impacts and Habitat Loss

Ecological inspection by Geraldene Dalby-Ball confirmed the presence of species such as the Powerful Owl, Eastern Whipbird, microbats, ringtail possums, and flying foxes. No provision has been made to quantify this and to monitor or mitigate the displacement or loss of habitat for these species.

- No wildlife rescue or relocation program is proposed;
- No nesting boxes or biodiversity offset works are included;
- This disregards B1.4 of the DCP and obligations under the Biodiversity Conservation Act 2016.

6. Pedestrian Safety & Traffic Impacts - Blind Corner on Steep Hill

The proposed development sits on a blind corner at the base of a steep hill on Lower Plateau Road-a road with no pedestrian footpaths. During construction which will likely go on for years, the influx of tradespeople for not only the subdivision but then the construction of 3 properties, including large cement trucks for concrete slabs will:

- Block road verges, forcing children walking to and from school-including our own-to step onto the road.
- Create hazards for vehicles, particularly on the corner where sightlines are already dangerous;
- Overflow into Yarrabee Place, which already suffers from a chronic parking shortage due to excess vehicles on Lower Plateau Road.

The absence of a traffic and pedestrian safety management plan is a serious oversight.

Council has a duty to ensure that children and pedestrians are not endangered by a development-induced increase in vehicular congestion and verge encroachment.

7. Stormwater and Hard Surface Overload

The introduction of increased impermeable surfaces will disrupt existing water flows, increase runoff and sedimentation, and risk introducing pathogens such as *Phytophthora* into local bushland. The stormwater plan does not account for downstream impacts on local creeks, nor does it provide evidence of compliance with Clause B5.15 of the DCP.

8. Unresolved Aboriginal Heritage Concerns

The development site sits on land with potential Indigenous heritage significance, including possible sharpening grooves. The application has not included a full Aboriginal Heritage Impact Assessment, nor has it consulted with the relevant Registered Aboriginal Parties (RAPs). Proceeding without this due diligence may result in breach of:

- Clause 5.10 of the LEP;
- National Parks and Wildlife Act 1974;
- NSW Aboriginal Cultural Heritage Regulation 2022.

9. Not in the Public Interest

The proposal is fundamentally not in the public interest. This is reflected by the sheer number of previous submissions from the local community. It prioritises private development profit at the expense of the environment and public interest. Under Section 4.15(1)(e) of the Environmental Planning and Assessment Act 1979, the application fails to demonstrate any net public benefit and instead introduces risk, degradation, and stress on local infrastructure.

Conclusion and Requests

We strongly urge Council to refuse DA2024/0303 in its current form. Should any revised version proceed, we request the following non-negotiable conditions:

1. Retention of all High Retention and prescribed trees, especially Tree 97.
2. Minimum 3m planting height for any replacement canopy trees.
3. Tree-lined privacy buffer (minimum 4m height at planting) along the Yarrabee Place boundary.
4. Comprehensive traffic and pedestrian safety plan, accounting for school children and blind corners.
5. Wildlife mitigation measures, including fauna monitoring, nesting boxes, and staged vegetation removal.
6. Full Aboriginal Heritage Impact Assessment before any further approval.

Yours sincerely,

Matthew Field
10 Yarrabee Place, Bilgola Plateau, NSW 2107

