

The General Manager Hornsby Shire Council

Dear Sir,

DA/1147/2022 - Residential - Construction of a split level dwelling house - 6 Chilworth Close, BEECROFT NSW 2119

The Beecroft Cheltenham Civic Trust objects to this proposed development on two broad issues, weed management and loss of significant Council owned trees.

Weed management.

The Trust has taken the liberty of forwarding this objection directly onto Council's Community and Environment Division for the reasons set out below. It is <u>essential</u> that Council's bushland management/ natural resources sections comment on this proposed development.

The subject site fronts 3 roads, Chilworth, Kenwick and Fiona. Council, with assistance from their volunteer bush regenerators, has been regenerating the weed infested Kenwick Lane road reserve over the past 5 years. The ongoing results, adjoining the subject site, have been outstanding. It is very important that the remaining northern section of Kenwick Lane adjoining the subject site is also completed. The weeds in this northern corner are extremely invasive weeds that, if not eradicated completely, will in the future, create ongoing maintenance issues with the potential to re-invade the regenerated bushland located downstream.

The ultimate goal is to completely eradicate the remaining weed infestation on Council land, and hopefully on the privately owned land. The optimum strategy to achieve this goal and permanently remove the weeds is to regenerate the two privately owned lots 11 and 12 at the same time as the road reserves. The worst weed infestation is on the western side of the two lots and this is where any bush regeneration should concentrate on.

So while the subject site can be conditioned through this DA process, dealing with the adjoining privately owned lot 12 will probably require a different approach by Council. Hence the inclusion of Council's Community and Environment Division in this DA objection. While the adjoining lot 12 is not part of this DA it is still important that all efforts are attempted by Council to get the best outcome. Therefore there is a strong argument that such a holistic approach is clearly in the public interest for all stakeholders to work collaboratively.

The determination of the proposed dwelling and its surrounding landscaping will not be affected by the proposed weed removal strategy as the bulk of the weeds are concentrated on the western side of the drainage easement. If the above strategy of cooperation is not employed then the Landscape Plan on the western section of the site is extremely likely to fail over time.

Even the use of heavy machinery on the western side is unlikely to achieve the desired outcome of total weed eradication. The landscape plan on the western side can be deferred for about 5 years so the invasive weeds can be fully eliminated by hand.

As a matter of interest Council has numerous examples of conditioned development approvals where the approved weed eradication program has not been properly managed and the highly invasive weeds remain, creating ongoing management problems for the owners, the community and of course Council. A good example of a successful project is the ecological recovery of a similarly

infested area in Burns Rd South where hand weeding by bush care volunteers has removed all invasive weeds over a 4 year period.

This DA is the ideal opportunity for Council's volunteer bush regenerators to work in conjunction with the owner of the site, and hopefully with the other land owner of Lot 12 at No5A to eliminate the invasive weeds completely. The suggested strategy will benefit Beecroft and is therefore in the public interest.

Significant tree loss in road reserve.

Referring to the Aboricultural Impact Appraisal Statement, there are two significant Blue Gums (No 2 and 4), that belong to Council, within the Chilworth Close road reserve, that have been identified for removal to construct the access driveway. The plan showing the two long-sections for the driveway indicate that the middle section of the driveway will be over two metres above natural ground level. However there appears to be no plans indicating how the raised driveway will be constructed. The driveway also appears to be wider than normal with planting down the centre.

The Trust questions the design and positioning of the driveway as there appears to be sufficient area to redesign the drive to avoid the two Blue Gums. Also the concept of an elevated driveway with piers to bridge the 2.5 m deep gully in the road reserve should be considered. There is no objection if the two Celtis trees (No1 and 3) need to be removed as the numerous Celtis trees in this area have become an ongoing weed problem.

Other matters.

The Biodiversity Development Assessment Report assessed the impact of the building platform and refers to the retirement of one credit for the loss of BGHF, but it appears to be silent on the potential loss of Blue Gums in the road reserve for the driveway. This needs checking. The report however does support the Trust's position on weed removal, as it states that a vegetation management plan should be prepared for the whole site to protect the retained trees as well as a weeding program to remove all invasive HTW (high threat weed) weeds.

The survey plan has only plotted about half the trees on the western section of the lot. Also, while the plan states pegs at the corners they cannot be found due to the irregular nature of the boundaries, the weed cover and topography. There should be indicators placed at the corners as a minimum. These two matters, missing trees and no boundary markings, are omissions that make it harder for Council's staff, the consultants and volunteer bush regenerators to carry out work in the area.

The SEE and the arboricultural report refer to the area being Blue Gum High Forest community (BGHF). They both acknowledge that the existing ecological community is in a poor degraded condition and has low floristic, structural and functional integrity. This is accepted but like the Biodiversity Development Assessment report they are silent on the site's potential for recovery of the bushland. As the western side of the subject site appears to be historically undisturbed, there is a high probability that hand weeding practices suggested above will achieve successful weed elimination and healthy bush recovery, as evidenced by the successful recovery of the adjoining bushland downstream within Kenwick Lane.

This objection should be treated as an invitation to reach out to the site's land owner to achieve a better outcome in the long term.

As outlined above, the local community wants to work in collaboration with the land owners to achieve a better ecological outcome. The Trust welcomes any opportunity to discuss the above comments with Council and the land owners, and work with all stakeholders to achieve the best outcome.

This approach is clearly consistent with Council's various strategies and therefore clearly in the public interest.

Yours faithfully
Ross Walker OAM
Vice President
Beecroft Cheltenham Civic Trust