



Heritage Referral Response

Application Number:	DA2019/1190
Date:	25/05/2020
To:	Daniel Milliken
Land to be developed (Address):	Lot 1 DP 651395 , 9999 Pittwater Road BROOKVALE NSW 2100 Lot 1 DP 784268 , 9999 Pittwater Road BROOKVALE NSW 2100 Lot B DP 966128 , 9999 Pittwater Road BROOKVALE NSW 2100 Lot 6 DP 785409 , 9999 Pittwater Road BROOKVALE NSW 2100

Officer comments

HERITAGE COMMENTS
Discussion of reason for referral
The proposal has been referred to Heritage as it contains a heritage item
I132 - Brushbox and Camphor Laurel Trees surrounding Brookvale Park - Pine Avenue, Alfred Street, unmade section of Federal Parade and Pittwater Road (near Pine Street intersection)
Details of heritage items affected
Details of the item as contained in the Warringah heritage inventory is as follows: <u>Statement of significance:</u> The mixed and single species Inter-war period row plantations form a more or less contiguous green-belt around this sportsground. The multi-stemmed mature Brush Box (<i>Lophostemon confertus</i>) and Camphor Laurels (<i>Cinnamomum camphora</i>) retain a high level of visual integrity. The trees with their inter-locking canopies and substantial scale create a strong visual foil and distinctive sense of place. The trees have local significance in terms of their long association with development of the site as a showground, a park and sportsground. They share important links with the local area's cultural and social history, particularly the local school and may have been established as a WWI commemorative grove. The thematic approach is typical of Sydney's public planting schemes in the early twentieth century. <u>Physical description:</u> The single row plantations of mature Brush Box (<i>Lophostemon confertus</i>) and Camphor Laurels (<i>Cinnamomum camphora</i>) form a more or less contiguous green-belt around this sportsground. Originally planted at approximately 6 metres centres within the boundary fence of Brookvale Park, these evergreen trees are now located outside the sportsground boundary along the Pine Avenue and Alfred Road frontages. The northern row of Brush Box (23 No.) is still within the boundary fence. The Alfred Road plantation (40 No.) is also comprised of a single species row of Brush Box and extends from Pittwater Road to Federal Parade. This row includes younger infill/ replacement planting. The Pine Avenue plantation includes both Camphor Laurels (17 No. - dominant) and Brush Box (6 No.). The short row of Brush Box (4 No.) in Pittwater Road (near Pine Avenue intersection) are part of the original scheme.
Other relevant heritage listings



Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	No	
Australian Heritage Register	No	
NSW State Heritage Register	No	
National Trust of Aust (NSW) Register	No	
RAIA Register of 20th Century Buildings of Significance	No	
Other	N/A	

Consideration of Application

The proposal seeks consent for the construction of a new grandstand and centre of excellence on the northern edge of Brookvale Oval. The proposal includes the removal of 11 heritage listed brush box trees, and proposes to replace them with 7 brush boxes and 4 tuckeroos.

The brush boxes are large trees that form part of the defined formal planting line around 3 sides of Brookvale Oval along with the Camphor Laurels. The trees are both of heritage significance and visual significance due to their size and important canopy coverage in an area of known low coverage. The heritage significance of the trees is enhanced by the easily read and defined planting line. Gaps in the northern line are noticeable, but they do not interrupt the legibility of the line or its significance, nor do they justify the removal of the remaining trees.

Photographic evidence from the Mayne-Wilson & Associates' *Heritage Report on Brookvale Park* (2005) indicates that the gaps in northern line are apparent by 1933 (pg 14) and are most likely deliberate due to existing buildings or for access purposes. The aerial photo from 1951 (pg 17) reinforces that these gaps have been established on the site for decades. It is further noted that the northern planting line shows the historical extent of Brookvale Park before the resumption of Federal Parade and its shift to the north. This provides physical evidence of the development and enlargement of the broader park over time.

The heritage significance and importance of these trees cannot be understated. While the park has been used for recreational purposes since 1911, over time its focus and facilities have changed. However, as noted in the 2005 report, '*The only fabric of heritage significance are the cultural plantings (mostly Brush Box trees around the eastern and western boundaries of the park, and along the northern boundaries of the rugby field*'. As the only remaining fabric of heritage significance, all efforts must be made to ensure their retention and protection.

Turning to the proposed tree replacement planting option, it is considered to be a poor attempt to offset the loss of the heritage significant trees and is not acceptable. The proposed location of the 7 new brush boxes is impacted and constricted by the pedestrian ramp/access area and proposed sewerage and stormwater lines. The trees would never be able to grow to a sufficient size to match the existing trees proposed for removal. Additionally these trees are located behind a retained group of brush boxes and would not contribute to the re-establishment of the defined formal planting line. Further, these plantings would likely be removed by any future development of the eastern grandstand.

The 4 tuckeroos proposed for in the Village Green would also not grow to a sufficient size to match the brush boxes, nor would they contribute to the important defined heritage tree line. A 'one for one' approach is also not acceptable for the replacement of heritage significant and visually important trees, given potential losses while trees establish themselves.

The proposal has also not considered key actions of the *Brookvale Oval Plan of Management 2002* (PoM). The plan catered for eventual development of the eastern and northern stands, however Action 53 specifically requires investigation and justification for their development, and for this to be provided in any development application. There has been no consideration of the eastern end in the proposal. Given the larger width and length of the eastern side, it would be considered possible to accommodate all the desired facilities on this side without having to remove any of the heritage trees in this area along Pine Street.

It is considered that there is the potential to further explore additional design options that retain the heritage listed trees. This could include the construction of a basement level on the northern side, reallocation of spaces and a shrinking of the building width. An option exploring a reduction in the size of the area behind the dead ball line on the southern end and shifting the entire field down should also be considered. It is noted that the proposal has already included this for the northern end and adopting a similar approach on the southern end would give additional space to construct the grandstand and retain the heritage listed trees.

There are also some further actions in the PoM that have not been addressed including:

- Action 47 to investigate the heritage significance of the two northern ticket booths
- Action 75 to retain mature trees on Alfred Street, Pine Street and Federal Parade.

Concerns are also raised in relation to the proposed stormwater and sewerage piping lines. Heritage would suggest that the proposed lines be amended to exit the site between trees 59 and 60 on the Pine Street frontage, given the larger gap here between plantings.

The proposed concrete ramp on the eastern end of the northern grandstand is also likely to heavily impact upon the structural root zone of tree 35, as will the proposed waste storage area. The proposed construction method for pier and beam construction as detailed in the arborist report is considered unlikely to be feasible in this area given the proposed concrete ramp. The design approach in this area should be reviewed to minimize impacts upon tree 35. Additionally, the proposed waste storage area should be moved to minimize impacts upon trees 35 and 34.

The design of the additional 18 car parking spaces on Alfred Road should also be revised to minimize impacts upon the heritage trees. The outward facing spaces should be removed. Any parking loss can be compensated by extending the car park to the north along the fence line.

Heritage does not object to the external design or presentation of the northern grandstand, only its location.

However, Heritage cannot support the proposal given the impact of the loss of the trees on the heritage significance of the overall item, the inadequacy of the tree replacement plan and the failure to address key actions of the *Brookvale Oval Plan of Management 2002*.

Recommendation

Heritage cannot support the proposal due to the adverse impact on the overall heritage item.

There are potential design solutions that should be further explored that will allow for the construction of the required facilities while still retaining the heritage significant trees, such as construction on the eastern end of the field.

Therefore Heritage recommends refusal of the application.

Consider against the provisions of CL5.10 of WLEP.

Is a Conservation Management Plan (CMP) Required? No

Has a CMP been provided? No

Is a Heritage Impact Statement required? Yes

Has a Heritage Impact Statement been provided? Yes

Updated Comments 24 April 2020

The amended plans from March 2020 indicate the removal of the brushbox trees from the northern side of the oval, and their replacement with wallum banksia and red bottle brush trees. These trees are indicated to grow to a height of 5m. These trees are unacceptable to Heritage as a replacement option as they are not a 'like for like' replacement of the brushbox trees nor will they grow to match their 16m to 20m height. Further, the area proposed for their planting appears to be constricted by overhead powerlines and hardspace that could impact upon the future health and potential growth of these trees. Heritage considers that the new grandstand and centre of excellence should be on the eastern side of the oval as this would avoid the removal of the heritage listed trees.

Heritage also maintains the aforementioned concerns for trees 34 and 35, and the proposed exit locations for stormwater and sewerage lines.

The updated Heritage Impact Statement has considered Action 47 of the PoM and investigated the heritage significance of the ticket booths. This issue is considered resolved.

Updated drawings for the car park on Alfred Road were provided on 24 April 2020. Drawing L_1103 indicates that the car park's outer row has been removed with car parking being extended along the fence lines as required in the previous referral response. This is acceptable to Heritage.

Recommendation

Heritage cannot support the amended plans. Heritage recommend refusal of the application due to its impacts upon the heritage trees and the unacceptable replacement plantings proposed.

Updated Comments 25 May 2020

Additional information was submitted by the applicant on 18 May 2020 in which the applicant notes it has not amended the proposed offset tree planting approach. Therefore Heritage's previous concerns of 24 April 2020 remain outstanding.

However the additional storm water drawings raise potential tree retention issues for heritage trees 47, 48, and 49 with significant impacts as identified in Council's landscape referral response (22/5/2020) . It also indicates retaining walls through the proposed bio-swale on the northern side of the building which will impact upon the ability of this area to support replacing plantings of brushboxes. Additionally the vehicle swept path analysis raises more concerns for potential impacts to heritage tree 35 which Heritage has already identified as being significantly impacted. These additional concerns need to be addressed in conjunction with the previous outstanding concerns. Heritage cannot support the proposal as presented.

Further Comments

COMPLETED BY: Brendan Gavin, Principal Planner

DATE: 27 November 2019 - Additional Comments 24 April 2020, Further Comments 25 May 2020

The proposal is therefore unsupported.

Note: Should you have any concerns with the referral comments above, please discuss these with the Responsible Officer.

Recommended Heritage Advisor Conditions:

Nil.