

## Landscape Referral Response

<b>Application Number:</b>	DA2023/0894
<b>Date:</b>	02/08/2023
<b>Proposed Development:</b>	Demolition works and construction of a dwelling house including swimming pool
<b>Responsible Officer:</b>	Alex Keller
<b>Land to be developed (Address):</b>	Lot 292 DP 16362 , 18 Rock Bath Road PALM BEACH NSW 2108

### Reasons for referral

This application seeks consent for the following:

- Construction / development works within 5 metres of a tree or
- New residential works with three or more dwellings. (RFB's, townhouses, seniors living, guesthouses, etc). or
- Mixed use developments containing three or more residential dwellings.
- New Dwellings or

### Officer comments

Council's Landscape Referral is assessed against the Pittwater Local Environment Plan (PLEP) clause C4 zone Environmental Living, and the following Pittwater 21 Development Control Plan (PDCP) controls (but not limited to):

- B4.22 Preservation of Trees and Bushland Vegetation
- C1.1 Landscaping
- D12 Palm Beach Locality

The site is located in the C4 Environmental Living zone, requiring development to achieve a scale integrated with the landform and landscape, and to minimise impact on the natural environment, including the retention of natural landscape features and existing trees, to satisfy the landscape objectives of the C4 Environmental Living zone.

In the assessment of the landscape outcomes of the proposal, Landscape Referral have visited the adjoining road reserve land, rock pool, and rock platforms in proximity to the development property on a number of occasions, as well as the beach and Reserve land, to gain a clear understanding of the proposal against PLEP and PDCP principles and controls. Additionally a site review of the road reserve land with Council's Bushland Management Officer has been undertaken to determine the resilience of existing native species found.

In terms of the landscape proposal within the development property boundaries, Landscape Referral raise no concerns generally except where identified below, based on the calculation prepared by the applicant that the required landscape area of 60% is achieved, and the landscape area matter shall be determined by the Assessing Planning Officer. The Landscape Plan proposals within the property include at grade and on structure planting appropriately selected for the harsh coastal environment. The existing native Paperbark tree located along the southern boundary is proposed for retention and protection. There are no new tall trees proposed within the property and rather typical wind and salt spray suited species such as Coastal Tea Tree and Coastal She Oak, that a more typical as tall shrubs

in coastal exposed sites, are proposed to be planted below the dwelling on the lower slopes and these are typically low height and wind pruned and unlikely to impact any views.

The proposed stormwater dispersal system is located whereby dispersal is directed into the cliff bushland zone, that will ultimately, during heavy rains disperse residential chemicals and other toxins downslope and fundamentally Landscape Referral do not support this strategy, in consideration of Pittwater LEP clause 7.8 Limited development on the foreshore area. The location of the dispersal trench shall rather be located further upslope below the verandah planter, and amongst the planted zone indicated on the Landscape Plan such that at least 3 metres of mass planted area is provided from the dispersal trench to the edge of new mass planting extent.

Landscape Referral raise the following concerns for the proposals within the property that require clarification and/or further information:

- roof planted area to be 600mm soil depth to support the intended planting, however understanding of any existing view loss from the height of planters and planting is to be considered and clarified in all documents.
- selection of easy care species for roof and other planting is to be considered and whether irrigation shall be provided for all planting on structure.
- the impact of the proposed stormwater dispersal system whereby dispersal is directed into the cliff bushland zone dispersing residential chemicals and other toxins downslope.

Within the road reserve land, the Landscape Plans indicate replanting of extensive areas with proposed native trees, shrubs and groundcovers, and concerns are raised that such extensive clearing of vegetation is unwarranted and not necessary. On review of the road reserve land, many existing and resilient locally native species exist in areas that are not impacted by the road works proposed and all should be retained. The Landscape Plans and the Arboricultural Impact Assessment only document existing trees, however as sighted additional locally native trees and many typical vegetation association species have been identified and all should be retained and enhanced, and thus a Vegetation Management Plan prepared by a qualified Ecologist is required to be prepared that shall include documentation of existing species (trees, palms, shrubs, groundcovers, grasses and vines) for retention, as well as a plan for bush regeneration to areas cleared. Locally identified species sighted include: Bloodwood, Cheese Tree, She Oak, Angophora, Lillypilly, Paperbark, Pittosporum, Cabbage Tree Palms, NSW Xmas Bush, Wattle, Muttonwood, Hibbertia, Dianella, Themedia, Wombat Berry, and Wonga Vine.

Proposed tree planting within the road reserve land shall replace existing trees to be removed, replacing the canopy loss, to ensure no loss of existing views from adjoining land. The location of trees shall be placed in proximity to existing trees that are removed in order to maintain the status quo of tree canopy distribution within the road reserve land. It is noted that from the streetscape, the existing Kaffir Plums proposed to be removed currently block views northward to the ocean and beyond, and these trees are approximately more than 10 metres in height although the Arboricultural Impact Assessment nominates these trees at 8 metres in height, along with all other existing native trees in the road reserve land including Bloodwoods, Cheese Trees and She Oaks. Equal replacement of existing canopy distribution with newly planted native trees does not give rise to concerns for existing view loss for adjoining properties, whereby new tree planting is located in proximity to existing trees removed.

Landscape Referral note that the visual impact of the proposed driveway within the road reserve land, supported by sandstone clad vertical walling presents a prominent built form over 4 metres in height, and consideration of a suspended structure may reduce such visual impact and be integrated with natural environment landscape, and well as provide an opportunity to extend bushland regeneration under the suspended structure utilising typical species found within the lower slopes (ie. palms and ferns), and thus reduce the visual prominence where the built form is horizontal and able to cast shadows down to ground levels. It is however unknown if there are geotechnical reasons for this

current proposal and Landscape Referral shall ultimately be guided by the relevant Council Engineering experts on this matter.

Landscape Referral raise the following concerns for the proposals upon the road reserve land that require clarification and/or further information:

- the extent of land clearing required to establish the landscape proposal as documented, presenting potential soil erosion issues downslope.
- absence of a Vegetation Management Plan.
- the visual impact of the proposed driveway within road reserve land.

At this stage Landscape Referral do not support the application for reasons as outlined above.

The proposal is therefore unsupported.

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

**Recommended Landscape Conditions:**

Nil.