



The General Manager  
Hornsby Shire Council

Dear Sir

**DA/572/2017 - 112 Chapman Avenue, BEECROFT - SUBDIVISION - ONE LOT INTO TWO**

The Beecroft Cheltenham Civic Trust objects to the amended plans dated 28 February 2020 to the proposed subdivision on the following grounds, listed below.

For such a highly constrained site the subdivision stage is a very important step in the development approval process and it is critical that all future problems emanating from any approval must be addressed now and not later. A fully designed dwelling, and not a concept design as submitted, should be incorporated as part of the subdivision DA so matters such as privacy, solar access and service connections are fully assessed.

There appears to be no assessment of the existing dwelling in terms of compliance on the new lot 2 in any of the submitted documentation. This matter was raised at the LEC conciliation conference. The existing dwelling appears to have serious compliance issues that should not be ignored.

The proposed drainage works within lot 1 are not minor but significant, and consequently potentially damaging to the long term health of the significant trees onsite. The submitted tree report tends to provide insufficient analysis of the long term impact of the drainage works on these trees. The Trust must assume that these trees source a high percentage of their moisture and nutrients from the watercourse area of the site, especially in times of drought. So logically this is the area where the important roots of the trees would be. Yet this is where the drainage works will be carried out.

The tree report does not appear to address the long term management of the significant trees. These gum trees are known to regularly drop branches. It is not wise to construct dwellings under gum trees. If any subdivision is approved, it would be simply a matter of time before both significant trees will be completely removed, or trimmed back to the extent their survival will be severely compromised. Associated with this is the issue of safety and liability and approving a dwelling will create a liability issue. This has not been addressed in any of the reports and appear to be silent on the subject.

In summary, the Trust has serious concerns that the object of the EPA Act can be achieved if approval is granted. If approved, the end result is likely to result in both dwellings being inferior to the existing development, plus loss of the trees. Which is contrary to the object of the Act. Subdivision is a critical step in the development approval process where any approval has the potential to lead to irreversible and poor environmental decisions at the next development stage.

Therefore the Trust again strongly recommends a refusal, as the likely cumulative adverse impacts of this development are definitely not in the public interest.

Yours Sincerely  
Ross Walker OAM  
President  
Beecroft Cheltenham Civic Trust

11 March 2020