

1st August, 2019

**Addendum for RFI dated 5 July 2019 for proposed RFB – DA54602
87 – 89 John Whiteway Drive, Gosford**

This letter is in response to the RFI from Council for the DA 54602, dated the 5 July, 2019.

We refer to the attached Vegetation Management Plan (VMP) by Conacher Consulting, and would like to make the following observations in regards to amenity, visual impact and preservation of scenic values.

The proposed tree retention forms a canopy cover of 14.9% in accordance with the NSW RFS recommendations and requirements dated 8 March 2019. The recommendations stipulate the entire site, of 87 – 89 John Whiteway Drive, is to be maintained as an Inner Protection Area (IPA) with the requirement of the canopy to be less than 15%. This requirement allows for appropriate bushfire fuel load reduction to improve the evacuation route for all residents in the John Whiteway Drive Precinct, in the unlikely event of a bushfire. This improves the amenity of the area by providing the proper duty of care for accessing or egressing by residents.

The reduced tree canopy amount, as shown on the revised architectural site plan DA100, consists of the removal of 807 trees, outside of the existing disturbed area on site. Historically, the site has had noncyclic changes in levels of disturbance resulting in a fluctuating tree canopy coverage, this is evident in aerial photographs presented in the contamination report by EIS. Furthermore, the proposed tree removal takes steps to achieve the NSW RFS bushfire requirements as well as prioritise the retention of native tree species with a long or medium useful life expectancy, with the identification of 84 exotic trees to be removed. Additionally, native flora non-endemic to the site constitute 261 trees to be removed of the proposed 807 trees. Removing non indigenous plants and retaining native species will enhance the outlook for residents and provide a non-competitive environment for the native trees.

Moreover, only 151 trees to be removed have been assessed to be of medium to useful life span as identified in the Conacher VMP. The remaining 656 trees to be removed are young trees (607), have less than 5 year life expectancy (18) or have a short life expectancy (31). 89 useful life expectancy trees are proposed to be

retained, with retention where possible of trees containing hollows for native fauna. These findings are presented in the extensive VMP and Flora and Fauna (FF) reports by Conacher Consulting, which have been undertaken to ensure that the tree removal is sympathetic to the establishment of a long lasting tree canopy.

An accompanying Geotechnical Report by JK Geotechnics supports the removal of trees as specified by the VMP will not adversely affect the stability of the ridgeline or result in an increased landslide risk for surrounding properties.

A CPTED report, by BRS, has been provided with the development application, which highlights the importance of the maintenance and reduction in dense vegetation in terms of impacting surveillance, *“landscaping that makes places attractive, but does not provide offenders with a place to hide or entrap victims.”* The reduction of low lying and dense unmaintained undergrowth with the retention of tall trees improves safety and security in the neighbourhood, in accordance with the recommendations of crime prevention.

An updated Visual Impact Assessment shows little impact in regards to altering the tree canopy when viewed from selected viewing corridors. The reduced canopy still maintains a pleasant outlook from Brisbane Water, Kibble Park and from Brian McGowan Bridge.

Lastly, a reduced canopy allows an improved outlook for residents to viewing vistas towards Gosford CBD and Brisbane Water for residents of the John Whiteway Precinct as well as bushwalkers visiting Rumbalara Reserve.