

Department of Planning and Environment

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Our ref: DOC22/946186
Your ref: SSD 17899480

Subject: Response to additional Information - Wentworthville Northside West Clinic Extension (SSD-17899480)

Thank you for your email received 20 October 2022 requesting comments from Environment and Heritage Group (EHG) on the additional information submitted in relation to impacts to trees associated with the proposed Wentworthville Northside West Clinic Extension (SSD-17899480). The additional information includes the following documents,

- *Review of DPIE EHG comments*, prepared by Birds Tree Consulting dated 6 October 2022, and
- *Impact Assessment of Trees 41, 48 and 49*, prepared by Birds Tree Consulting dated 14 October 2022.

EHG has undertaken a review of the above and notes the following.

- In considering the impacts of encroachment into the tree protection zones of trees 41, 48 and 49 the additional information states that 3.3.4 (b) – (h) of Australia Standard 4970:2009 Protection of Trees on Development Sites (AS4970:2009) has been considered. EHG notes the following in relation to this assessment.
 - In relation to 3.3.4(a), EHG retains the view that root mapping is the most practical way to determine the extent of impacts to the subject trees from the proposed development. The additional information states that the presence of roots has been assumed however this assumption does not provide any detail on the number and size of roots that will be impacted. This is a key consideration in determining the viability of the subject trees into the future.
 - In relation to 3.3.4 (b) it is unclear to EHG how the potential loss of root mass including the number and size of roots to be lost has been considered if root mapping has not been undertaken.
 - In relation to 3.3.4 (c), no evidence is provided to support the statements that the subject tree species are tolerant to root disturbance. It is also noted that tree 48 is identified in the arborist report as a *Casuarina cunninghamiana* however site photos indicate the tree has been misidentified and is likely a Eucalypt species.
 - In relation to 3.3.4 (e), the additional information notes that none of the trees are on a lean however tree 48 has substantial trunk lean with tension roots anticipated in the direction of the proposed development footprint.

With the above noted, EHG does acknowledge that although classified as major under AS4970:2009, the proposed encroachment of 13 - 18% may be sustainable by some trees species provided the trees are in good health and condition prior to impacts and there is no damage to structural roots as a result of the works.

Whilst EHG considers there is insufficient justification to demonstrate the ongoing viability of the trees, should the proposal proceed to an approval, the following conditions should be applied to assist in mitigating and remediating any impacts that do occur. As the trees are located within the Council reserve it may be appropriate to seek confirmation from Council that it accepts the risk that the subject trees may not remain viable.

Recommended tree protection conditions

Project Arborist

A Diploma qualified Arborist (AQF 5) must be engaged to establish tree protection measures, including tree protection fencing and ground protection within the tree protection zone (TPZ) of trees to be retained prior to the commencement of any works. The Arborist must be on site to supervise any works in the vicinity of or within the Tree Protection Zone (TPZ) of any trees required to be retained on the site or any adjacent sites.

The Project Arborist must provide certification that all works are undertaken in accordance with Australian Standard 4970:2009 Protection of trees on development sites and a copy of this certification shall be submitted to the approval authority upon completion of the works.

Excavation within the tree protection zone of tree 41, 48 and 49

All excavation within the tree protection zone trees 41, 48 and 49 must be undertaken under the supervisions of a Diploma qualified (AQF 5) Arborist using minimally destructive techniques such as hand-digging, compressed air or water-jetting or other non-destructive techniques. Root pruning should be avoided however where necessary, all cuts should be clean cuts using sharp tools such as secateurs, pruners, handsaws, chainsaws or specialised root pruning equipment. Roots greater than 50mm diameter must not be severed.

Monitoring and maintenance

Trees 41, 48 and 49 are to be monitored for a period of 18 months following the completion of works within the tree protection zone by a Diploma qualified (AQF 5) Arborist. The arborist must inspect the trees every 6 months and undertake any remedial works required to maintain tree vitality. The tree monitoring inspections, findings and any remedial works undertaken must be documented and provided to the satisfaction of DPE Planning upon completion of the monitoring period. In the event the subject trees die or substantially decline, they are to be replaced by advanced replacement tree of the same species (minimum pot size of 100L).

In relation to tree 41, Cumberland Council has suggested that a picus sonic tomograph test be undertaken to determine the extent of internal decay at the primary/codominant stem union. EHG recommends that this test be undertaken prior to works commencing on site and before suggested pruning works are undertaken. This will ensure any defects (and associated risk) can be managed before the site becomes an active construction site. If tree 41 requires removal at any point it must be replaced by advanced replacement tree of the same species (minimum pot size of 100L).

Should you have any queries regarding this matter, please contact Shaun Hunt, Senior Conservation Planning Officer via [REDACTED] or [REDACTED]

Yours sincerely



14/11/22

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Biodiversity and Conservation