

# **Preliminary Arboricultural Impact Assessment** Lot 3 DP732565 - 7 City View Road, Pennant Hills



Prepared for: EG Group Australia Pty Ltd Prepared by: Travers Bushfire & Ecology Angelene Wright (B. Sc.) and Lindsay Holmes (B. Sc.) Authors: Approved by: Michael Sheather-Reid (B. Nat. Res. Hons.) - Managing Director Date: 30 November 2021

#### **Proposed Works**

The planning proposal seeks to amend Hornsby Council's planning instrument (HELP 2013) to facilitate the future renewal of the site as a mixed-use commercial office and residential redevelopment, incorporation a pocket park, community space in addition to high standards of architectural, landscape and sustainable design. The concept design capitalises on the slope of the site to provide a 7-storey, stepped building, which seeks to retain the existing heavily treed setting particularly along the City View Road and Boundary Road frontages.

The development concept has sought to retain the vast majority of existing trees particularly within the southern and western building setback areas. Whilst a number of these trees are located within the 3m development impact footprint, the proponent seeks to retain these trees wherever possible, and a specific provision will be included in the site-specific Development Control Plan to achieve tree retention and protection in these areas.

The landscaping plan prepared by Arcadia shows a number of tree plantings proposed around the perimeter of the site to compensate for losses within the development footprint and to improve site amenity. A further 30 trees close to the building footprint may be retained subject to further investigation at the DA stage. We currently recommend removal of 17 trees of approximately 110 across the site (~15%) that occur within the development footprint or 3m thereof, of whose SULE rating was a 4 (dead, dying, dangerous, etc).

Low significance - four (4) remove \ four (4) further investigation \ two (2) retain Tree summary Medium significance - thirteen (13) remove \ twenty-five (25) further investigation \ twenty-two (22) retain High significance – one (1) retain

Report	Со	nten	ts	
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#### Background

Tree survey and assessment was conducted on site on 26 August 2021, in accordance with Australian Standard AS4970 (2009)-Amendment 1 (2010). The subject site covers 6,500m<sup>2</sup> and is shown in Figure 1. The locations of 71 trees have been mapped in order to determine which trees will be impacted by the proposed development. It should be noted that there are more trees on the site than those presented in this report, however only those in close proximity to the development footprint have been assessed.

figures included in this report:

- vigour
- Tree AZ assessment

- works

Trees with diameter at breast height (DBH) of 150 mm or greater were assessed. A metal tag embossed with the tree number (e.g. T001) was attached to each tree. The location of each tree was plotted using a handheld Trimble GPS unit (subject to GPS accuracy at the time of survey).



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The following survey, assessment and measurements were also undertaken with accompanying map Tree condition, height, diameter at breast height (DBH), basal diameter (BD), canopy spread and

Tree health and risk assessment and useful life expectancy (ULE rating)

Tree protection (TPZ) & structural root zone (SRZ) calculations Assessment of the significance of individual trees using STARS

Tree retention and removal status and plans to identify the trees impacted by the proposed

Figure 1 – Subject site

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### TREE CONDITION AND LIFE EXPECTANCY

#### Condition

The assessment of tree condition is undertaken by visual inspection of the tree and takes into account the condition of the roots, trunk, branches, foliage, previous pruning, pests, disease, nesting hollows, fauna scratch marks, previous damage and the surrounding environment that may influence the condition of the tree.

#### Useful life expectancy (ULE)

The condition information is used to determine the Useful Life Expectancy (ULE) of each tree and takes into account the age of the tree, the life span of the species, local environmental conditions, recent climactic conditions, estimated life expectancy, the location of the tree and safety of persons and property.

The ULE methodology takes into account whether a tree can be retained with an acceptable level of risk based on the information available at the time of inspection. An ULE assessment is not static as it relates to the tree's health and the surrounding conditions. Whilst it is recognised that changes to the tree's condition will affect the assessment, changes to the surrounding environment may result in changes to the ULE assessment.

	Table 1 – Useful Life Expectancy (ULE) (Barrell, 2009)
Category	Description
1	Long - life span greater than 40 years
2	Medium - life span from 15 to 40 years
3	Short - life span from 5 to 15 years
4	Remove - should be removed within 5 years

#### **TREE SIGNIFICANCE**

#### **Environmental significance**

Trees need to be considered with regard to the overall environment and are subject to specific legislation such as:

- Biodiversity Conservation Act (NSW) 2016
- Environmental Protection and Biodiversity Conservation Act (Commonwealth) 1999
- Biosecurity Act (NSW) 2015
- Environmental Pest Species

#### Biodiversity Conservation Act (NSW) 2016 (BC Act)

The Schedules of the BC Act list a number of species, populations and ecological communities that are classified as critically endangered, endangered or vulnerable. Where a site is not biodiversity certified, the proposal will need to be assessed by a biodiversity development assessment report (BDAR) to accompany a development proposal. The proposal may require offsetting through the Biodiversity Offset Scheme if a) the proposal impacts biodiversity lands mapped by DPIE, b) the proposal impacts above nominated threshold areas, or c) a test of significance identifies a significant impact. The subject site is not biodiversity certified.

#### Environmental Protection and Biodiversity Conservation Act (Commonwealth) 1999

The Schedules of the EPBC Act list a number of species and ecological communities that are classified as critically endangered, endangered or vulnerable. The EPBC Act requires the preparation of an impact assessment if an activity or development is likely to have an effect on species or ecological communities listed in the schedules of the EPBC Act.

#### Biosecurity Act (NSW) 2015

There are a number of pest or exotic species that are listed within specific regions within the NSW Biosecurity Act. These listings contain detailed descriptions of each listed species, their habitat and reproductive attributes and the recommended control or eradication methods as well as actions required with regard to reporting, transport or sale of each species.

#### **Environmental Pest Species**

There are a number of environmental pest species that are not listed in the BC Act (2016), the EPBC Act (1999), or the Biosecurity Act (2015). These species commonly cause problems within or adjacent to developed or urban areas. These species can have aggressive, fast growing or fast reproduction attributes which replaces other species. They can have destructive root systems which cause damage to pipes, structures, foundations and services. Some environmental pest species can be undesirable within natural bushland areas by degrading and / or dominating habitats and reducing natural biodiversity. Environmental pest species are not classified as noxious but are recognised by Councils and other authorities as pest species and in many cases are exempt from protection under Council's Tree Preservation Orders.

#### Habitat tree assessment

A habitat tree assessment was not undertaken for this site. In general, if any hollows are observed in specific trees during the arboricultural impact assessment, they are noted in the tree health data table (see Attachment 1). Hollow-bearing trees are typically given a rating with regard to the numbers and sizes of tree hollows present. Habitat Trees are given a classification as follows:

Category 1: Significant habitat trees (high): Large hollow/s suitable for cockatoos or large forest owls >30cm and/or Trees containing two (2) or more good quality medium hollows 10-30cm and/or >8 small hollows.

Category 2: Significant habitat trees (moderate) Trees containing one medium hollow 10-30cm and/or 3-8 small hollows.

Category 3: Remaining hollow bearing trees generally containing small or low numbers of hollows.

#### Landscape significance

The Institute of Australian Consulting Arboriculturalists (IACA) have established a Significance of a Tree, Assessment Rating System (STARS) to assess the landscape significance of a tree. The rating system utilises structured qualitative criteria to assist in determining the retention value for a tree. There are two phases to the STARS Assessment. The first is an assessment of tree attributes with respect to High, Medium and Low Significance. Subsequently, the Tree Retention Value matrix shown on Attachment 3 is used to determine the priority for removal and retention.

The significance of a tree with regard to the landscape is generally assessed as one of the following:

- Significant Prominent from a broad landscape perspective
- High Prominent from a neighbourhood perspective
- Medium prominent from adjacent areas surrounding the site
- Low prominent from a site perspective only

Once the landscape significance of an individual tree has been assessed, the retention value can be determined. A breakdown of the tree significance and retention values are provided in Attachment 2.

#### Visual significance

Visually significant trees are assessed with respect to the average attribute values of other trees in the wider locality. A tree with well above average height, girth or spread is considered to be 'of Visual Significance'. The visual significance of a specific tree can also consider other parameters such as girth, canopy spread, health, aesthetic appearance or location (e.g., on a hilltop, or as the centrepiece of a formal garden) of the tree.

Visual Significance ratings for a tall open forest averaging 22 metres tall (typical of the coastal areas of NSW between Wollongong and Port Stephens) are as follows:

- V1 High significance typically >25m height/ >20m spread / >600mm DBH - Large emergent tree
- V2 Moderate significance generally 15-25m height/ >10m spread >600mm DBH - Prominent tree typically with a large spread
- V3 Low significance >10m height / >10m spread / >600mm DBH -Typically a visually attractive low tree with large spread and DBH

## **DEVELOPMENT PLANNING AND TREE PROTECTION ZONES**

#### Tree protection setbacks

Development footprints which impact on more than 10% of a Tree Protection Zone (TPZ) will usually require the removal of that tree. Development footprints shall be located away from retained trees such that adequate clearances are provided for the Tree Protection Zone (TP7)

Disturbance within the TPZ can be detrimental to the tree's root system and in turn affect the stability, health and condition of the tree.

#### Major encroachments into tree protection zones

Where the proposed development activity is greater than the 10% loss of TPZ area (m<sup>2</sup>), the activity is considered to be a major encroachment into the TPZ.

Where major encroachments are to occur within the TPZ of trees intended to be retained, it must be demonstrated that the works or activities will not have any significant impact upon the health and



Figure 11 - Typical diagram of a tree protection zone and structural root zone of a tree (Source: AS7970-2009)



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Where trees are proposed for retention, the development footprint must avoid the TPZ around trees. This TPZ is set aside for the protection of the tree (or group of trees) as it is essential for the stability and longevity of the tree/s. Existing soil levels should be retained within the TPZ. The TPZ is often delineated by a temporary fence during the construction phase of the project.



condition of the tree. To demonstrate this, detailed root mapping investigation by non-invasive methods may be necessary. Other factors such as age class, health, vigour, trunk lean, disturbance tolerance of the species, and building design may need to be taken into account in the arboricultural assessment.

Where major encroachments are proposed to occur into the TPZ then the Structural Root Zone (SRZ) of the tree will also be taken into account and avoided if possible.

Where trees have multiple trunks, an assessment needs to consider the number and diameter of each trunk. Based upon the Australian Standard for Protection of Trees on Development Sites, AS 4970-2009, the Diameter at Breast Height (DBH) of multi-trunk trees is calculated by:

$$DBH = \sqrt{(DBH_{1})^{2} + (DBH_{2})^{2} + (DBH_{3})^{2}}$$

#### **Development design and tree protection zones**

Based upon the Australian Standard for Protection of Trees on Development Sites (AS4970-2009), the radius of the TPZ for a single tree is calculated as:  $TPZ = 12 \times DBH$ .

#### Developments within the tree protection zone

#### Minor encroachments into tree protection zones

Based upon AS4970-2009 some minor development encroachments can occur within the calculated TPZ provided that:

No more than 10% of the area (m<sup>2</sup>) of the TPZ is removed

The area to be removed is outside the SRZ, and

The area (m<sup>2</sup>) to be removed or disturbed is compensated by increasing the TPZ radius in other directions so that there is no net loss in area (m<sup>2</sup>) of the original calculated Tree Protection Zone (TPZ).



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#### **TREE PROTECTION MEASURES**

To determine the SRZ and TPZ, the following is applied in accordance with Australian Standard AS 4970 - 2009 -Amendment 1-2010.

The tree protection zone (TPZ) radius is measured by the DBH x 12 (Australian Standard AS 4970 - 2009), where the DBH is the trunk diameter measured at 1.4m above the ground. A TPZ should not be less than 2m or greater than 15m (except where crown protection is required). Clause 3.3 covers variations to the TPZ. The TPZ of palms, other monocots, cycads and tree ferns should not be less than 1m outside the crown projection.

The structural root zone (SRZ) is the area which is required to maintain a tree's stability. The SRZ is measured as:

SRZ radius =  $(BD \times 50)^{0.42} \times 0.64$  where BD is the basal trunk diameter, in metres, measured above the root buttress. If BD is 50cm, then the SRZ would be 2.47m.

During the survey, DBH was measured for each tree to allow for TPZ to be calculated should the tree be retained as part of the future landscaping.

The SRZ and TPZ calculated for each of the trees assessed within the study area are provided in Attachment

When working in close proximity of any tree to be retained or the nominated TPZ located within or adjacent to potential development areas, the following general management principles should be adopted:

- earthworks around subject trees are to be undertaken in the presence of an AQ5-certified arborist who may provide additional on-site advice
- machine digging within the root mass of the subject tree (or trees) is to be minimised and, where possible, replaced by hand digging
- any exposed roots of the subject tree should be wrapped and protected during exposure and be replaced in a similar position prior to disturbance
- · inspection of retained trees by an AQ5-certified arborist should be conducted annually to 3 years after development completion.

Any retained tree on site will require protection both during and after development construction, applying the following tree protection guidelines:

The following guidelines are proposed in relation to any trees that may be retained within or adjacent to the proposed works area:

i. Installation of a TPZ will be required surrounding any retained tree or group of trees. This TPZ can generally be provided by preserving an area equivalent to that shown in Schedule 1. A <u>SRZ</u> will apply to all retained trees in close proximity to work areas. No more than 10% of the TPZ should be impacted by earthworks with no infiltration into the SRZ. The TPZ is to be compensated elsewhere on the impacted tree to compensate for the loss of small areas of the TPZ. This is achieved by increasing the TPZ to an equivalent area to the area of impacted TPZ (Figure 11).

- ii. Trees to be retained, and in close proximity to any works, are to be protected by temporary fencing. Such temporary fencing can be constructed from plastic mesh, post and wire or temporary chain link fence panels. All fence posts and supports are to be located clear of the roots and have sufficient strength to support the fence without bending or collapsing. TPZs in close proximity to proposed works are to be marked and signposted. The protection fencing is not to be removed or altered without the approval an appointed arborist. TPZ fencing is to be inspected on a regular basis and maintained in good condition.
- iii. All trees nominated for removal are to be removed only after the temporary fencing of the trees to be retained has been completed and prior to any construction activity or bulk earthworks. Approved tree removal operations in the vicinity of retained trees are to be undertaken in a manner that avoids canopy or root damage and / or soil compaction to any TPZ associated with any retained tree. Such works should be supervised by a qualified arborist.
- Stumps are to be ground not dozed or dug out unless iv. they impact on the installation of services, roads or building works.
- v. All excavation including but not limited to trenches, footings and major earth movement are to be avoided within TPZs.
- vi. Stockpiling materials and soils within TPZs is to be avoided.
- vii. All machinery and vehicles are to be excluded from TPZs during all operations.
- viii. Where the proposed works are likely to cause excessive dust generation, the tree is to be protected with shade cloth on the tree protection fence to minimise dust collection on the leaves.
- ix. The following activities prohibited within TPZs includes but is not limited to:
  - machine excavation (including trenching)
  - excavation for silt fencing
  - cultivation
  - storage
  - · preparation of chemicals, including cement products
  - · parking of vehicles or plant
  - refuelling
  - dumping of waste
  - refuelling
  - wash down or cleaning of equipment
  - placement of fill
  - lighting of fires
  - soil level changes
  - temporary or permanent installation of signs
  - Physical damage to trees.
- x. Any works undertaken within TPZs are to be supervised and certified (photographed and documented) by a qualified arborist.
- xi. Where advised by the arborist, trunk and branch protection (Figure 12) is to be installed to a minimum

height of 2m using materials and positioning as advised by an appointed arborist.

- Where advised by the arborist, other temporary root xii. protection measures (Figure 12) such as thick mulch (50-100mm deep) or crushed rock below rumble boards, are to be installed to prevent root damage and soil compaction within the TPZ.
- xiii. Scaffolding is to be erected outside of the TPZ, where unavoidable, protection measures are to be specified by the appointed arborist.
- All services are to be routed outside of the TPZ. xiv. Where not possible the arborist will specify directional drilling (at least 600mm deep) or manual excavation to avoid impacted on the in-situ roots subject to the works and potential root damage.
- xv. If pruning is required it is to be undertaken by an arborist in accordance with AS4373 to prevent structural damage, disease and poor form.

#### General tree protection measures during construction

Prior to earthworks or construction, the removal of the trees identified for removal should be undertaken with particular attention given to ensure that no damage occurs to any part of the retained trees such as canopy foliage, branches, trunk or SRZ.

Prior to demolition or earthworks, secure protective fencing is to be erected around individual trees or groups of trees that have been identified as being retained. This fencing shall be located no closer than the extent of the TPZ of each retained tree (refer to the Tree Retention and Removal Plan). Where the structure to be demolished is within the TPZ the protective fencing shall be aligned to be a maximum of 0.5m away from the structure to be demolished.

Where the approved construction footprints encroach into the TPZ, protective fencing must be aligned no further than 0.5 metre away from the proposed structure or footprint.

The purpose of the fencing is to protect the tree roots, trunk and branches, and to minimise detrimental impacts on the trees during demolition and construction. Fencing shall be 1.8m high chain mesh material securely fixed to steel supporting posts with top and bottom strainer top or steel pipe rails. Chain-link fencing panels are acceptable but must have connectors top and bottom to each adjoining panel.

The site supervisor shall ensure that at all times during site works that no activities, stockpiles, storage, disposal of materials, vehicle access or vehicle and machinery parking shall take place within the areas encompassed by the tree protection fencing. The site supervisor shall also ensure that the protective fences remain secure throughout the development work period.

Construction scaffolding can be erected within the tree protection fencing provided that each of the weight

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irrigation.

arborist.

Any tree damage that occurs to trees or tree roots during site works is to be treated by an experienced and suitably qualified arborist. Where branch pruning works are required, all pruning works including the removal of deadwood are to be undertaken in accordance with Australian Standard AS 4373-1996 - Pruning of Amenity Trees and the work is to be undertaken by an experienced and suitably qualified arborist

distribution points are spread over a minimum of 2m<sup>2</sup> and these points are over existing soil levels to avoid soil compaction.

Trees shall be inspected at regular intervals by the project arborist or at critical stages during the demolition and construction stages to identify signs of stress and recommend remedial action such as mulching and

Specific excavation for services that require critical fall (e.g. sewer, stormwater) may be undertaken within the tree protection fencing provided that trenching is dug using hand tools, thrust or directional boring or vacuum excavation, and tree roots are not severed unless they spatially conflict with the installed pipes. This work within the tree protection fencing must be carried out under the instructions from an experienced and suitably qualified project arborist.

All access within the tree protection fencing for temporary and permanent works must be carried out under the instruction of an experienced and suitably gualified project

Tree protection fencing must remain in a functional condition throughout the demolition and construction works and can only be removed to allow for works identified in the landscape plan.

Landscape works in the vicinity of retained trees must be sympathetic to tree retention and existing ground levels within the TPZ. The natural ground contours and depth within TPZs located outside of the construction or earthworks footprint must remain unchanged.

# Tree protection fencing

Temporary tree protection fencing should be erected before any machinery or materials are brought onto the site and before the commencement of works (including demolition and bulk earthworks). Once erected, protective fencing must not be removed or altered without approval by the project arborist. The fencing is to be fully secured to restrict access onto the protected root zone.

AS4687 specifies applicable fencing requirements. Installed construction fencing on the recommended alignment of the TPZ fencing can be installed as part of the protective fencing.

For construction crews, signage identifying the TPZ shall be placed at 10m intervals along the TPZ barrier fencing. These signs will face towards the development site and shall have lettering that complies with AS 1319. These signs will also specify the severe penalties for harming the TPZ in any way.

TPZ barrier fencing is to be inspected on a regular basis and maintained in good condition. Any works within the mapped TPZs is to be supervised (for excavation works) or under the direction of an AQ5 qualified arborist to limit damage to root zones and to install additional root, trunk and branch protection measures.

# **CONCLUSIONS**

This report has been prepared to assess the condition and significance of a number of trees on the property known as Lot 3 DP732565, 7 City View Rd, Pennant Hills, and to assess the potential impact of the proposed development on the identified trees. The assessments carried out in this report are based on the Australian Standard AS4970-2009 – Protection of Trees on Development Sites. The terminology used in this report is also consistent with that used in the AS 4970-2009.

This report has been commissioned by EG Group Australia Pty Ltd and site drawings and plans have been provided by Fender Katsalidis Architects. Arcadia has prepared the landscape plans

Provided that the tree protection measures in this report are implemented and works are carried out in a sensitive manner it is considered that the proposed development will not have a significant impact on long-term health of the retained trees.

Of the 71 trees assessed on-site and based upon the proposed development this report has determined the following:

- Twenty-four (24) trees are able to be retained ٠
- Thirty (30) are recommended for further investigation
- Seventeen (17) are recommended for removal

There is approximately 30-40 tree further on site that have not been assessed, largely near the corner of Boundary Rd and City View Rd, as well as a few individuals along the railway corridor boundary, bringing the total number of trees estimated on site to 110.



Trees subject to further investigation are those typically located in close proximity to the proposed development footprint that may have an SRZ or TPZ partially compromised. In addition, exotic species are included that may not necessarily require removal if in moderate-good condition. It is recommended that further investigation is undertaken upon thirty (30) of the assessed trees when final plans are submitted for DA approval. For selected trees of good health in close proximity to the building, tree root mapping or branch mapping may be undertaken to justify the retention or removal status.

Table 2 - Summary of the 24 trees for retention (# of trees)							
		Listed in Biodiversity	Env Pest (Exempt	Low Landscape	Medium Landscape	High Landscape	
		Cons. Act	from TPO)	Signif.	Signif.	Signif.	
	SULE 1						
	SULE 2			1	21		
Condition	SULE 3			1			
	SULE 4						

Table 3 - Summary of the 17 trees for removal (# of trees)									
		Listed in	Env Pest	Low	Medium	High			
		Biodiversity	(Exempt	Landscape	Landscape	Landscape			
		Cons. Act	from TPO)	Signif.	Signif.	Signif.			
	SULE 1								

SULE 2

SULE 3

SULE 4

Condition

Table 4 - Summary	of the 30 trees fo	or further investiga	tion (# of trees)

Table 4 - Summary of the So trees for further investigation (# of trees)							
		Listed in	Env Pest	Low	Medium	High	
		Biodiversity	(Exempt	Landscape	Landscape	Landscape	
		Cons. Act	from TPO)	Signif.	Signif.	Signif.	
	SULE 1						
	SULE 2			4	24	1	
Condition	SULE 3				1		
	SULE 4						





Notes:

1) For trunk and branch protection, use boards and padding that will prevent famage to bark. Boards are to be strapped to trees, not nails or screwed. 2) Rumble boards should be of a suitable thickness to prevent soils compaction and root damage.

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# Figure 13 - Examples of trunk, branch and ground protection as per AS4970-2009

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Disclaimer: The mapping is indicative of available space and location of features which may prove critical in assessing the viability of the proposed works. Mapping has been produced on a map base with an inherent level of naccuracy, the location of all mapped features are to be confirmed by a registered surveyor. 1:250 GDA 1994 MGA Zone 56 dwg no. 210831 AW

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# ATTACHMENT 1 – TREE ASSESSMENT DATA TABLE

Tag No.	Common Name	Scientific Name	DBH (cm)	Calc DBH (cm)	BD (cm)	Height (m)	Spread (m)	Vigour %	ULF	Δ7	STARS Life Expect.	STARS	STARS retain value	TPZ Radius	SRZ Radius	Retain \ Remove \ Further	Reason for Removal	Comment
	Nume	Hume	(611)	(011)		(,	(,	70	011		Expecti	3,8,,,,,	Value				nemova	connent
T001	Blackbutt	Eucalyptus pilularis	77	77	87	20	11	80	2d	A2	15-40yrs	Medium	Medium	9.24	3.12	FIR		Exotic vines causing damp on trunk. healthy tree otherwise
T002	Blackbutt	Eucalyptus pilularis	45	45	52	20	7	90	2d	A2	15-40yrs	Medium	Medium	5.40	2.51	FIR		Exotic vines causing damp, rot on trunk, crowding adjacent Grevillia
T003	Silky Oak	Grevillea robusta	34	34	41	14	8	95	2a	A1	15-40yrs	Medium	Medium	4.08	2.28	FIR		Other unknown vine
		Grevillea																
T004	Silky Oak	robusta	22	22	26	15	5	90	2a	A1	15-40yrs	Medium	Medium	2.64	1.88	Retain		Few dead branches
		Corvmbia																
T005	Spotted Gum	maculata	28	28	34	18	4	95	2a	A1	15-40yrs	Medium	Medium	3.36	2.10	Retain		Nice tall straight tree
T006	Blackbutt	Eucalyptus pilularis	29	29	37	20	4	95	2a	A1	15-40yrs	Medium	Medium	3.48	2.18	Retain		Nice straight tree
T007	Blackbutt	Eucalyptus nilularis	27	27	32	21	Δ	95	20	710	15-40vrs	Medium	Medium	3 24	2.05	FIR		45 deg bend in trunk at 8m otherwise tall and straight
1007	Didekbutt	pirarans	27	2,	52	21			20	210	10 40 913	Weddin	Weddin	5.24	2.05			Stugn
		Corymbia																
T008	Spotted Gum	maculata	15	15	19	16	2	95	2a	A1	15-40yrs	Medium	Medium	2.00	1.65	Retain		On slope approx. 10deg lean, tall
		Fucalyptus																
T009	Blackbutt	pilularis	41	41	45	27	8	95	2a	A1	15-40yrs	Medium	Medium	4.92	2.37	FIR		Bracket fungus at 5m
T010	Sweet Pittosporum	Pittosporum undulatum	20	20	25	10	3	95	3c	Z10	15-40yrs	Medium	Medium	2.40	1.85	FIR		Crown broken, dead branches, poor canopy
T011	Turpontino	Syncarpia	10	10	22	14	E	QE	20	710	15 <b>4</b> 0vrc	Modium	Low	2 20	1 70	EID		Boor crown, crowdod, canony off contro
1011	ruipentine	giomunjeru	19	19	25	14	5	65	20	210	13-40913	Weddulli	LOW	2.20	1.75	FIN		For crown, crowded, carropy on centre
T012	Dead stag	Dead stag	47	47	64	23	2	0	4a	Z4	<5yrs	Low	Very low	5.64	2.74	Remove	Health	
		Grevillen																
T013	Silky Oak	robusta	25	25	32	14	7	90	2a	A1	15-40yrs	Medium	Medium	3.00	2.05	Retain		Exposed roots, on slope, tall and straight



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Тад	Common	Scientific	DBH	Calc DBH	BD	Height	Spread	Vigour			STARS Life	STARS	STARS retain	TPZ Radius	SRZ Radius	Retain \ Remove \ Further	Reason for	
No.	Name	Name	(cm)	(cm)	(cm)	(m)	(m)	%	ULE	AZ	Expect.	signif.	value			Investigation Required (FIR)	Removal	Comment
T014	Spotted Gum	Corymbia maculata	43	43	48	27	13	95	2a	A1	15-40vrs	Medium	Medium	5.16	2.43	Retain		Large tree, good form, straight
T015	Spotted Gum	Corymbia maculata	34	34	48	25	13	95	2a	A1	15-40yrs	Medium	Medium	4.08	2.43	Retain		Canopy off centre, otherwise health tree
T016	Swamn Oak	Casuarina	20	29	41	15	0	05	20	A 1	15 40 mg	Madium	Madium	2.26	2.28	Datain		Some dead lower branches, canopy off
1016	Swamp Oak	giauca	28	28	41	15	9	95	Za	AI	15-40yrs	weatum	weatum	3.30	2.28	Retain		centre
T017	Swamp Oak	Casuarina glauca	16	16	22	14	2	85	2c	Z11	15-40yrs	Medium	Medium	2.00	1.75	FIR		Crowded
		Casuarina																
T018	Swamp Oak	glauca	19	19	22	15	3	90	2a	Z11	15-40yrs	Medium	Medium	2.28	1.75	FIR		Tall and spindly
		Conversion																
T019	Swamp Oak	glauca	20	20	28	17	3	90	2a	Z11	15-40yrs	Medium	Medium	2.40	1.94	FIR		Tall and spindly
T020		Acmona cmithii	11 17	20	26	0	0	80	20	A 1	1E 40.000	Madium	Madium	2 4 2	1 00	Dataia		
1020		Acmena smithi	11,17	20	20	9	8	80	Zd	AI	15-40915	weatum	Medium	2.43	1.88	Retain		
	Sydney Blue	Fucalvatus																
T021	Gum	saligna	52	52	70	22	13	60	4c	Z5	5-15yrs	Low	Low	6.24	2.85	Remove	Health	Exposed wood 0-3m, borers in trunk
T022	Sydney Blue	Eucalyptus	27	37	18	22	11	75	40	75	5-15vrs	Medium	Low	A A A	2 / 3	Remove	Health	Exposed wood at Am, bracket fungus attack
1022	Guili	Sungnu	57	57	40	23		75	40	25	5 15 15	Weddin	LOW	4.44	2.43	Kemove	ileaith	
		Corymbia																
T023	Spotted Gum	maculata	33	33	42	19	14	85	2a	A1	15-40yrs	Medium	Medium	3.96	2.30	FIR		Crowded by existing development
T024	Sydney Blue Gum	Eucalyptus saliqna	43	43	60	24	13	90	2a	A1	15-40yrs	Medium	Medium	5.16	2.67	FIR		
											· · ·							
	Chinese																	Planted exotic sp., crowded by surrounding
T025	Hackberry	Celtis sinensis	17	17	22	6	4	80	2a	A1	15-40yrs	Low	Low	2.04	1.75	FIR		development
	Chinasa																	Planted exetic cn. crowded by currounding
T026	Hackberry	Celtis sinensis	16	16	22	6	4	80	2a	A1	15-40yrs	Low	Low	2.00	1.75	FIR		development
T027	Swamp Oak	Casuarina	72	72	20	22	0	00	22	Λ1	15 10000	Modium	Modium	2 74	2 20	Potoin		
1027	эматтр Оак	yiuuca	21	21	38	23	ŏ	90	Zd	AT	10-40γrs	wealum	wealum	3.24	2.20	Keldili		
	Sydnev Blue	Eucalvotus																
T028	Gum	saligna	30	30	38	23	12	90	2a	A1	15-40yrs	Medium	Medium	3.60	2.20	Retain		



Tag	Common	Scientific	DBH (cm)	Calc DBH	BD (cm)	Height	Spread	Vigour	1115	47	STARS Life	STARS	STARS retain	TPZ Radius	SRZ Radius	Retain \ Remove \ Further	Reason for Romoval	Commont
NO.	Name	Name	(cm)	(cm)	(cm)	(11)	(11)	70	ULC	AL	Expect.	Signin.	Value			investigation Required (FIR)	Removal	Comment
т029	Swamp Oak	Casuarina alauca	22	22	42	22	6	85	2a	A1	15-40vrs	Medium	Medium	2.64	2.30	Retain		
		5																
		Casuarina			10		-											
1030	Swamp Oak	glauca	22	22	42	23	6	85	Za	A1	15-40yrs	Medium	Medium	2.64	2.30	Retain		Slightly crowded
T031	Swamp Oak	Casuarina	18	18	30	22	6	85	25	۸1	15- <i>4</i> 0vrs	Medium	Medium	2 16	2.05	Petain		Slightly crowded
1051	Swallip Oak	giuucu	10	10	52	25	0	65	Zd	AI	13-40915	Medium	Medium	2.10	2.05	Retain		
T032	Turpentine	Syncarpia glomulifera	15	15	18	8	10	40	4c	Z5	5-15yrs	Low	Low	2.00	1.61	Remove	Health	Leaning >30deg, canopy off centre, poor form
	Sydney Blue	Eucalyptus																
T033	Gum	saligna	38	38	52	25	14	90	2a	A1	15-40yrs	Medium	Medium	4.56	2.51	FIR		
T034	Swamp Oak	Casuarina alauca	26	26	46	23	12	90	2a	A1	15-40vrs	Medium	Medium	3.12	2.39	Retain		Slightly crowded
		5												-				
		Syncarpia																
T035	Turpentine	glomulifera	15	15	18	11	7	80	2d	Z1	15-40yrs	Low	Low	2.00	1.61	Retain		Crowded
T036	Swamp Oak	Casuarina alauca	16	16	25	19	7	80	2a	A1	15-40vrs	Medium	low	2.00	1.85	Retain		Slightly crowded
1030	Swamp Oak	giudeu	10	10	25	15	,	00	20	//1	15 40415	Wiedidini	2000	2.00	1.05			
		Casuarina																
T037	Swamp Oak	glauca	19	19	33	20	6	85	2a	A1	15-40yrs	Medium	Medium	2.28	2.08	Retain		Slightly crowded
T020	Plackbutt	Eucalyptus	41	41	EA	24	15	00	22	۸1	15 40 vrc	Modium	Madium	4 0 2	2 5 5	Potoin		
1038	BIACKDUTT	pilularis	41	41	54	24	15	90	Za	AI	15-40yrs	weatum	wealum	4.92	2.55	Retain		
		Casuarina																
T039	Swamp Oak	glauca	24	24	35	17	8	75	2c	Z11	5-15yrs	Medium	Low	2.88	2.13	FIR		Crowded, canopy off centre
		Syncarpia	24	24	26		_		2		15 40	<b></b>		0.50	4.00	515		At bottom of slope, suppressed, dead lower
1040	Turpentine	glomulifera	21	21	26	11	/	90	2c	211	15-40yrs	Medium	Medium	2.52	1.88	FIR		branches
		Conumbia																
T041	Spotted Gum	maculata	33	33	41	20	6	95	2a	A1	15-40yrs	Medium	Medium	3.96	2.28	FIR		Healthy, good form, canopy slightly off centre
		Grevillea														_		
T042	Silky Oak	robusta	31	31	37	26	8	95	2a	A1	15-40yrs	Medium	Medium	3.72	2.18	FIR		Good form, straight, tall
	Crucere	Fuendantes																
T043	Swamp Mahogany	Eucalyptus robusta	38	38	51	17	9	95	4e	Z8	<u>15-40</u> yrs	Medium	Medium	4.56	2.49	Remove	Health	Dangerous lean toward building



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Тад	Common	Scientific	DBH	Calc DBH	BD	Height	Spread	Vigour			STARS Life	STARS	STARS retain	TPZ Radius	SRZ Radius	Retain \ Remove \ Further	R
No.	Name	Name	(cm)	(cm)	(cm)	(m)	(m)	%	ULE	AZ	Expect.	signif.	value			Investigation Required (FIR)	R
<b>TO 44</b>		A	22.40	20	24	12		05	2-		45.40		N 4 a alta una	2.40	2.40	Distain.	
1044		Acmena smithii	22,19	29	34	13	8	95	Za	AI	15-40yrs	iviedium	weatum	3.49	2.10	Retain	
T045	Lilly Pilly	Acmena smithii	19	19	24	12	4	95	2a	Δ1	15-40vrs	Medium	Medium	2.28	1 82	FIR	
1015	Liny i my			15					24	7.11	10 10/10	meanan	inculuit	2.20	1.02		
	Chinese																
T046	Hackberry	Celtis sinensis	15	15	22	8	4	50	2a	A1	15-40yrs	Low	Very low	2.00	1.75	FIR	
T047	Syzygium sp	Syzygium sp	22	22	29	13	7	95	2a	A1	15-40yrs	Medium	Medium	2.64	1.97	FIR	
T048	Syzygium sp	Syzygium sp	12,20	23	26	9	7	95	2a	A1	15-40yrs	Medium	Medium	2.80	1.88	Remove	Dev
T040	Disakhutt	Eucalyptus	50.29	70	07	25	10	05	20	710	15 40 mc	Madium	Madium	0 4 2	2 1 2	Pomovo	Day
1049	BIACKDULL	piluluris	59,50	70	87	25	12	65	20	210	15-40915	weaturn	Medium	0.42	5.12	Kelliove	Dev
		C															
T050	Swamp Oak	alauca	15	15	22	15	8	85	2a	A1	15-40yrs	Medium	Low	2.00	1.75	Retain	
											/ -						
		Casuarina															
T051	Swamp Oak	glauca	16	16	23	19	6	80	2a	A1	15-40yrs	Medium	Low	2.00	1.79	FIR	
		Casuarina															
T052	Swamp Oak	glauca	35	35	55	23	8	85	2a	A1	15-40yrs	Medium	Medium	4.20	2.57	FIR	<b> </b>
		Casuarina	10	10	20	22	_	05	2		45.40			2.22	2.00		
1053	Swamp Oak	glauca	19	19	30	22	5	85	Za	Al	15-40yrs	Medium	Medium	2.28	2.00	FIR	
T054	Sydney Blue Gum	Eucalyptus saliana	56	56	75	25	18	85	2d	Δ2	15-40vrs	Medium	Medium	6 72	2 93	Retain	
1031	Guili	Sungha	50		, 3	25	10		24	7.12	10 10/10	meanan	inculuit	0.72	2.55		
T055	Lilly Pilly	Acmena smithii	14,13	19	24	17	8	85	2a	A1	15-40yrs	Medium	Low	2.29	1.82	FIR	
		Eucalyptus															
T056	Blackbutt	pilularis	61	61	78	28	25	90	2a	A1	15-40yrs	High	High	7.32	2.98	FIR	
					_	_	_		_						_		
T057	Lilly Pilly	Acmena smithii	15	15	18	13	6	90	2a	A1	15-40yrs	Medium	Medium	2.00	1.61	Remove	Dev
TOPO		Acmona cmithii	10	10	24	10	0	00	3-	Λ1	15 40.000	Madium	Madium	2 20	1 0 2	Datain	
1020	LIIIY PIIIY	ACHIERU SITIUTII	19	19	24	10	9	00	۷Zd	AT	10-40915	weaturn	wealum	2.20	1.02	Retain	



Reason for Removal	Comment
	Good canopy tree
	Healthy
	Dormant starting to hud
Development	Exotic vines
Development	
	Slightly crowded
	Slightly crowded
	Slightly crowded
	Slightly crowded
	Small & medium deadwood
Development	Crowded

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Tag No.	Common Name	Scientific Name	DBH (cm)	Calc DBH (cm)	BD (cm)	Height (m)	Spread (m)	Vigour %	ULE	AZ	STARS Life Expect.	STARS signif.	STARS retain value	TPZ Radius	SRZ Radius	Retain \ Remove \ Further Investigation Required (FIR)	
											•	Ŭ					
T059	Syzygium sp	Syzygium sp	21	21	28	13	7	85	2a	A1	15-40yrs	Medium	Medium	2.52	1.94	FIR	
T060	Syzygium sp	Syzygium sp	19	19	25	18	8	80	2a	A1	15-40yrs	Medium	Medium	2.28	1.85	FIR	
T061	Grev Ironhark	Eucalyptus paniculata	34	34	41	23	13	90	2a	Δ1	15-40vrs	Medium	Medium	4 08	2.28	Remove	De
1001		panneanata		51	11	20	10	50	24	7.12	10 10 10	Incolum	mediam		2.20		
		Eucalyptus															
T062	Blackbutt	pilularis	41	41	48	23	18	85	2a	A1	15-40yrs	Medium	Medium	4.92	2.43	Remove	De
		5															
T063	Blackbutt	eucalyptus pilularis	110	110	116	27	13	95	2a	A1	15-40yrs	Medium	Medium	13.20	3.52	Remove	De
TOCA	<u> Dia akhutt</u>	Eucalyptus	27	27	22	22	14	00	20	A 1	15 40 ura	Madium	Madium	2.24	2.05		
1064	BIACKDULL	pilularis	27	27	32	22	14	90	Zd	AI	15-40915	Medium	wedium	3.24	2.05	FIK	
		Eucalyptus															
T065	Blackbutt	pilularis	36	36	46	20	9	95	2a	A1	15-40yrs	Medium	Medium	4.32	2.39	Remove	De
т066	Blackbutt	Eucalyptus pilularis	89	89	108	25	14	95	2a	A1	15-40yrs	Medium	Medium	10.68	3.42	Remove	De
	Sweet	Pittosporum															
T067	Pittosporum	undulatum	18,16,11	26	29	8	7	90	2a	A1	15-40yrs	Medium	Low	3.18	1.97	Remove	De
		Fucalvatus															
T068	Blackbutt	pilularis	58	58	66	25	18	85	2a	A2	15-40yrs	Medium	Medium	6.96	2.78	Remove	De
T060	Sydney Blue	Eucalyptus	58	58	69	27	17	75	Ac	75	5-15vrc	Medium	Medium	6.96	2.83	Remove	
1009	Guili	sunynu	50	50	03	21	1/		40	23	2-13A12	weduum	weduum	0.50	2.03	iteniove	
	Sweet	Pittosporum															
T070	Pittosporum	undulatum	21	21	26	17	10	75	3c	Z10	5-15yrs	Low	Low	2.52	1.88	Retain	<u> </u>
T071	Sydney Blue Gum	Eucalyptus saligna	61	61	90	25	18	65	4c	Z5	5-15yrs	Low	Low	7.32	3.17	Remove	



dwg no.

Reason for	
temoval	Comment
velopment	
velopment	
velopment	Canopy a bit off centre and leaning toward rail line
velopment	
velopment	Large tree, good form
velopment	
velopment	Small deadwood
Health	Large bark wound, scar and borers
	Crowded, suppressed, stressed, lots of small deadwood
Health	Bark damage at base 0-1.8m, exposed wood, borers in base

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# **ATTACHMENT 2 – TREE SIGNIFICANCE CRITERIA**

# Tree Significance - Assessment Criteria





- The tree is in good condition and good vigour;
- The tree has a form typical for the species;
- The tree is a remnant or is a planted locally indigenous specimen and/or is rare or uncommon in the local area or of botanical interest or of substantial age;
- The tree is listed as a Heritage Item, Threatened Species or part of an Endangered ecological community or listed on Councils significant Tree Register;
- The tree is visually prominent and visible from a considerable distance when viewed from most directions within the landscape due to its size and scale and makes a positive contribution to the local amenity;
- The tree supports social and cultural sentiments or spiritual associations, reflected by the broader population or community group or has commemorative values:
- The tree's growth is unrestricted by above and below ground influences, supporting its ability to reach dimensions typical for the taxa in situ - tree is appropriate to the site conditions.

#### 2. Medium Significance in landscape

- The tree is in fair-good condition and good or low vigour;
- The tree has form typical or atypical of the species; -
- The tree is a planted locally indigenous or a common species with its taxa commonly planted in the local area
- 2 The tree is visible from surrounding properties, although not visually prominent as partially obstructed by other vegetation or buildings when viewed from the street,
- The tree provides a fair contribution to the visual character and amenity of the local area,
- The tree's growth is moderately restricted by above or below ground influences, reducing its ability to reach dimensions typical for the taxa in situ

### 3. Low Significance in landscape

- The tree is in fair-poor condition and good or low vigour;
- The tree has form atypical of the species; -
- The tree is not visible or is partly visible from surrounding properties as obstructed by other vegetation or buildings,
- The tree provides a minor contribution or has a negative impact on the visual character and amenity of the local area,
- The tree is a young specimen which may or may not have reached dimension to be protected by local Tree Preservation orders or similar protection mechanisms and can easily be replaced with a suitable specimen,
- The tree's growth is severely restricted by above or below ground influences, unlikely to reach dimensions typical for the taxa in situ - tree is inappropriate to the site conditions,
- The tree is listed as exempt under the provisions of the local Council Tree Preservation Order or similar protection mechanisms. The tree has a wound or defect that has potential to become structurally unsound. 62
- Environmental Pest / Noxious Weed Species
- The tree is an Environmental Pest Species due to its invasiveness or poisonous/ allergenic properties,
- The tree is a declared noxious weed by legislation. -
- Hazardous/Irreversible Decline
- The tree is structurally unsound and/or unstable and is considered potentially dangerous,
- The tree is dead, or is in irreversible decline, or has the potential to fail or collapse in full or part in the immediate to short term.

#### The tree is to have a minimum of three (3) criteria in a category to be classified in that group.

Note: The assessment criteria are for individual trees only, however, can be applied to a monocultural stand in its entirety e.g. hedge.

				Significance
		1. High	2. Medium	
		Significance in Landscape	Significance in Landscape	Significance in Landscape
nated Life Expectancy	1. Long >40 years			
	2. Medium 15-40 Years			
	3. Short <1-15 Years			
Estir	Dead			







# ATTACHMENT 3 – TREE RETENTION VALUE – PRIORITY MATRIX

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## **ATTACHMENT 4 - TREE AZ CATEGORIES**

#### ATTACHMENT 5 - USEFUL LIFE EXPECTANCY (ULE)

(Source: Jeremy Barrell 2009 <u>www.Barrelltreecare.co.uk</u>)

	1 – Long	2 – Medium	3 – Short	4 – Removal	5 – Moved or Replaced
A	Trees that appeared to be retainable at the time of assessment for more than 40 years with an acceptable level of risk	Trees that appeared to be retainable at the time of assessment for 15 – 40 years with an acceptable level of risk	Trees that appeared to be retainable at the time of assessment for 5 - 15 years with an acceptable level of risk	Trees that should be removed within the next 5 years	Trees which can be reliably removed or replaced
В	Structurally sound trees located in positions that can accommodate future growth	Trees that may only live between 15 and 40 years	Trees that may only live between 5 and 15 years	Dead, dying, suppressed or declining trees through disease or inhospitable conditions	Small trees less than 5m in height
С	Trees that could be made suitable for retention in the long term by remedial care	Trees that may live for more than 40 years but would be removed for safety or nuisance reasons	Trees that may live for more than 15 years but would be removed for safety or nuisance reasons	Damaged trees through structural defects including cavities, decay, included bark, wounds or poor form	Trees that have been pruned to artificially control growth
D		Trees that could be made suitable for retention in the medium term by remedial care	Trees that require substantial remedial tree care and are only suitable for retention in the short term	Damaged trees that are clearly not safe to retain	
E				Trees that may live for more than 5 years but should be removed to prevent interference with more suitable individuals or to provide space for new plantings	
F				Trees that are damaging or may cause damage to existing structures within 5 years	
G				Trees that will become dangerous after removal of other trees for reasons given in (A) to (F)	

**CAUTION:** TreeAZ assessments <u>must</u> be carried out by a competent person qualified and experienced in arboriculture. The following category descriptions are designed to be a brief field reference and are <u>not</u> intended to be self-explanatory. They <u>must</u> be read in conjunction with the most current explanations published at <u>www.TreeAZ.com</u>.

#### Category Z: Unimportant trees not worthy of being a material constraint

Local p	olicy exemptions: Trees that are unsuitable for legal protection for le
Z1	Young or insignificant small trees, i.e. below the local s
Z2	Too close to a building, i.e. exempt from legal protection
72	Species that cannot be protected for other reasons, i.e. so
Lo	setting of acknowledged importance, etc
High ri	isk of death or failure: Trees that are likely to be removed within 10
	failure
Z4	Dead, dying, diseased or declining
	Severe damage and/or structural defects where a high ris
<b>Z</b> 5	reasonable remedial care, i.e. cavities, decay, included b
	and vulnerable to adverse weather conditions, etc
Z6	Instability, i.e. poor anchorage, increased exposure, etc
	Excessive nuisance: Trees that are likely to be removed within 10 y
77	Excessive, severe and intolerable inconvenience to the e
21	would be likely to authorize removal, i.e. dominance, de
	Excessive, severe and intolerable damage to property to
<b>Z8</b>	tribunal would be likely to authorize removal, i.e. severe
	etc
Good	I management: Trees that are likely to be removed within 10 years the
	Severe damage and/or structural defects where a high ris
<b>Z</b> 9	reasonable remedial care, i.e. cavities, decay, included b
	to adverse weather conditions, etc
710	Poor condition or location with a low potential for recov
210	trees or buildings, poor architectural framework, etc
Z11	Removal would benefit better adjacent trees, i.e. relieve
Z12	Unacceptably expensive to retain, i.e. severe defects req
NOTE:	Z trees with a high risk of death/failure (Z4, Z5 &

**NOTE:** Z trees with a high risk of death/failure (Z4, Z5 & Z6) or causing severe inconvenience (Z7 & Z8) at the time of assessment and need an urgent risk assessment can be designated as ZZ. ZZ trees are likely to be unsuitable for retention and at the bottom of the categorization hierarchy. In contrast, although Z trees are not worthy of influencing new designs, urgent removal is not essential and they could be retained in the short term, if appropriate.

Ca	tegory A: Important trees suitable for rete
	worthy of being a materia
1	No significant defects and could be retained with minimal re
12	Minor defects that could be addressed by remedial care and/
	Second significance for historical subtrand commencementing

A3	efforts to retain for more than 10 years
A4	Trees that may be worthy of legal protection for ecological

**NOTE:** Category A1 trees that are already large and exceptional, or have the potential to become so with minimal maintenance, can be designated as AA at the discretion of the assessor. Although all A and AA trees are sufficiently important to be material constraints, AA trees are at the top of the categorization hierarchy and should be given the most weight in any selection process.

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Scale at A3

A3 dwg no.

 Rev.
 Sheet
 of

 1.0
 24
 24

Project Tree Assessment Report Lot 3 DP 732565 City View Rd, Pennant Hills

Scale at

ocal policy reasons including size, proximity and species size threshold for legal protection, etc in because of proximity, etc cheduled noxious weeds, out of character in a

years because of acute health issues or severe structural

sk of failure <u>cannot</u> be satisfactorily reduced by park, wounds, excessive imbalance, overgrown

vears because of unacceptable impact on people extent that a locally recognized court or tribunal ebris, interference, etc

the extent that a locally recognized court or e structural damage to surfacing and buildings,

brough responsible management of the tree population sk of failure can be <u>temporarily</u> reduced by park, wounds, excessive imbalance, vulnerable

ery or improvement, i.e. dominated by adjacent

physical interference, suppression, etc uiring excessive levels of maintenance, etc

# ention for more than 10 years and ial constraint

emedial care /or work to adjacent trees

e or rarity reasons that would warrant extraordinary

reasons (Advisory requiring specialist assessment)

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