

Our Ref: PRE2024/0053

2 December 2024

Homes NSW
Community Engagement Team
Cindy Cunningham

CommunityEngagement@homes.nsw.gov.au

Dear Cindy,

Subject: Proposed Residential Flat Development (P5-2024-175)

Property: 69 Trafalgar Street and 2-6 Gover Street, Peakhurst

Proposal: Consolidation of 4 existing lots into 1 lot, tree removal, and construction of a 3 storey residential flat building comprising 33 dwellings (22 x 1-bedroom and 11 x 2-bedroom units), 15 basement parking spaces and landscaping on site

Thank you for the opportunity to provide feedback on the proposal at the above address. I have included the below advice for your consideration in the detailed design of the development.

Please note that engineering comments were not able to be provided given the short timeframe provided to provide comments.

Trees and Landscaping

Council's Senior Landscape and Arboricultural Assessment Officer has undertaken a desktop assessment and provided the following comments:

Comments

- 1) *The submitted Arboricultural Impact Assessment (AIA) prepared by Red Gum Horticultural dated 19 September 2024 has assessed 39 trees that will be impacted by the proposed development.*
- 2) *The AIA recommends the removal of 35 trees numbered 1-10, 12-31, 33 and 36-39.*
- 3) *Trees numbers 1, 2 and 4 are located on Councils verge. These trees are not considered a design constraint; however, they should be replaced with new street trees consistent with the surrounding street trees along Gover Street.*
- 4) *12 of the proposed tree removals are classified as exempt species, noxious weed or dead.*
- 5) *The AIA recommends the retention of four (4) trees numbered 11, 32, 33, 34. Trees numbered 11, 33 and 34 are located within the neighbouring allotments. T32 is located on Councils verge.*
- 6) *The submitted documentation appears to be poorly coordinated with several inconsistencies and conflicting information being provided.*
- 7) *The 'Locality Plan' as part of the Civil Plans prepared by Xavier Knight dated 18 September 2024 'Rev F' has incorrectly shown No. 6 Gover Street as being outside the*

- 'PROPOSED DEVELOPMENT' area. No. 6 Gover Street forms part of the proposed Development site.*
- 8) The AIA is not based on the current Architectural or Stormwater Plans. Furthermore, it has not assessed the proposed Landscaping and Civil Plans. This means that the AIA is outdated and has not assessed the true development impacts to existing trees.*
 - 9) The Landscape Plans prepared by Conzept Landscape Architects dated 17 September 2024 'Rev E' does not detail the proposed new footpath within Council's verge surrounding the site.*
 - 10) The proposed new footpath is within the Structural Root Zone (SRZ) of Council's street tree (T32) that is proposed to be retained. The new footpath impact to T32 has not been assessed in the provided AIA. The street tree is a mature native Lophostemon confertus in good health with a 'High' Retention Value rating and forms part of an avenue planting along Gover Street. In accordance with IACA 'Significance of a Tree Assessment Rating System (S.T.A.R.S)', 'High' Retention Valued trees are a priority for retention and should be retained and protected with design modifications / appropriated setbacks prescribed by Australian Standard AS4970 'Protection of trees on development sites'.*
 - 11) In accordance with Australian Standard AS4970 'Protection of trees on development sites' the SRZ is the area required for tree stability (a larger area is required to maintain a viable tree).*

Recommendations

- 12) It is recommended that all plans and documents are properly coordinated and assessed by an AQF level 5 Arborist to assess the full development impact to existing trees. Based on the findings of a revised AIA and potential non-destructive root investigation in accordance with Section 3.3.4 AS4970, tree sensitive design modifications should be investigated to retain neighbouring trees and Council's street tree T32.*
- 13) That tree protection measures are installed prior to any works commencing in accordance with Australian Standard AS4970 'Protection of trees on development sites' and Appendix F 'Site Plan B – Survey of Trees to be Retained and Tree Protection Plan' prepared by Red Gum Horticultural dated 19 September 2024.*
- 14) It is also recommended that the Landscaping Plans are updated to include seven (7) replacement Lophostemon confertus street trees along Trafalgar Street and Gover Street. This is to replace the removed street trees and contribute to increase and enhance the extent of urban tree canopy throughout the Georges River LGA to the achievable 40% minimum by 2038 set by the Greater Sydney Regional Plan. All new trees must be grown in accordance with Australian Standards AS2303:2018 'Tree stock for landscape use'.*

Should you need any further assistance, please do not hesitate to contact Georges River Council on 9330-6400.

Regards,



Linley Love
Coordinator of Advisory and Specialist Assessment