City of Greater Geelong, Statutory Planning - Date Received 30/10/2026

TMC REPORTS

TREE RETENTION REPORT



REPORT COMMISSIONED BY:
Aurora Project Management

SUBJECT SITE:
147–149 Bellarine Highway,
Newcomb Vic 3219

DATE OF REPORT:
Thursday, 29 October 2026

REPORT PREPARED BY:
[redacted]
Certificate V in Arboriculture (AQF Level 5)

VERSION:
1

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1 Assignment

1.1 Brief

This report has been prepared to assess whether Trees 29, 30, 37 and 38 can be retained in accordance with the architectural plans prepared by Brown Commercial Building Pty Ltd for the proposed mixed-use development at 147–149 Bellarine Highway, Newcomb (Job No. BC0638, Development Application Issue 33; Site Plan, Drawing 04, Revision 32, dated 06/10/2026).

Detail has been requested in relation to the following instructions:

- To assess the impact of the proposed driveway, car park, loading area and path on Trees 29, 30, 37 and 38.
- To determine whether Trees 29, 30, 37 and 38 are expected to remain viable if retained in accordance with the plans.
- To determine whether tree sensitive construction or a non-destructive root investigation would allow the trees to be retained.

1.2 Summary

- The proposed car park and driveway encroach into approximately 57% of the NRZ of Tree 29 and 67% of the NRZ of Tree 30, and into the SRZ of both trees. Tree 30 is located within a proposed car parking space. These are major encroachments.
- The proposed driveway, loading area and path encroach into approximately 35% of the NRZ of Tree 37 and 52% of the NRZ of Tree 38, and into the SRZ of both trees. These are major encroachments.
- Due to the close proximity of these works, the size and species of the trees, and the soil conditions of the area, roots are expected to be present throughout the area of the works, from ground level to approximately 600–700 mm below ground level.
- Trees 29, 30, 37 and 38 could only be expected to remain viable if the driveway, car park, loading area and path were constructed above grade using permeable materials, without excavation.
- The proposed site levels require excavation of approximately 400–500 mm below ground level for the driveway, car park and loading area, and approximately 200 mm below ground level for the path. Above-grade construction is therefore not achievable.
- A non-destructive root investigation is not considered practical, as it would be expected to uncover vital roots within the area of the works and would not change this outcome.
- It is therefore not considered practical to retain Trees 29, 30, 37 and 38 based on the plans.

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2 Trees 29, 30, 37 and 38

2.1 Tree details

Tree No.	Botanical Name & Common Name	Age	Origin	Height	Canopy Spread N-S E-W	DSH CA1 DAB	Health	Structure	ULE	Amenity Value	Retention Value	NRZ Radius	SRZ Radius	Permit Required	Comments
29	*Eucalyptus gomphocephala* Tuart	Mature	Native WA	8.8 m	N-S 6.0 m E-W 6.0 m	0.32 m 1.01 m 0.42 m	Fair	Fair	10-20 years	Moderate	Moderate	3.8 m	2.3 m	No	Moderate deadwood.
30	*Eucalyptus gomphocephala* Tuart	Mature	Native WA	8.8 m	N-S 8.0 m E-W 8.0 m	0.57 m 1.79 m 0.58 m	Fair/ good	Fair/ good	20+ years	Moderate	Moderate	6.8 m	2.6 m	No	Growing hard on boundary line. Overhanging neighbouring dwelling.
37	*Eucalyptus camaldulensis* River red gum	Mature	Native NSW QLD SA VIC	12.0 m	N-S 8.0 m E-W 8.0 m	0.65 m 2.04 m 0.75 m	Fair	Fair	10-20 years	High	Moderate	7.8 m	2.9 m	Yes 52.17	DAB has been estimated. Historic pruning does not meet AS4373 - 2007. Minor decay in trunk. Minor deadwood. Kino leakage suggestive of bacterial fungus or borer. Co-dominant habit. Dense vegetation at trunk.
38	*Eucalyptus camaldulensis* River red gum	Mature	Native NSW QLD SA VIC	12.0 m	N-S 8.0 m E-W 8.0 m	0.80 m 2.51 m 0.78 m	Fair/ poor	Fair	10-20 years	High	Moderate	9.6 m	3.0 m	Yes 52.17	Moderate decay in trunk. Minor deadwood. Kino leakage. Historic lopping. Torsion cracks in trunk.

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2.2 Photographs



Tree 29



Tree 30



Tree 37 – basal growth



Tree 37 – historic pruning



Tree 38



Tree 38 growing conditions

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3 Proposed encroachments

The encroachments of the proposed works into the NRZ and SRZ of Trees 29, 30, 37 and 38 are as follows:

Tree	Proposed works	NRZ encroachment	SRZ encroachment
Tree 29	Car park	34%	37%
Tree 29	Driveway	23%	9%
Tree 29	**Total**	**57%**	**46%**
Tree 30	Car park	33%	86%
Tree 30	Driveway	34%	9%
Tree 30	**Total**	**67%**	**95%**
Tree 37	Driveway	28%	1%
Tree 37	Loading area	7%	0%
Tree 37	Path	0%	0%
Tree 37	**Total**	**35%**	**1%**
Tree 38	Driveway	32%	2%
Tree 38	Loading area	14%	0%
Tree 38	Path	6%	6%
Tree 38	**Total**	**52%**	**8%**

Totals are the sum of the individual encroachments.

All four trees are subject to a major encroachment, as the works exceed 20% of the NRZ and extend into the SRZ of each tree.

Tree 30 is located within a proposed car parking space, and the car park and driveway cover approximately 95% of its SRZ. The encroachments into the NRZ and SRZ of Trees 29 and 30 are shown in Figure 1.

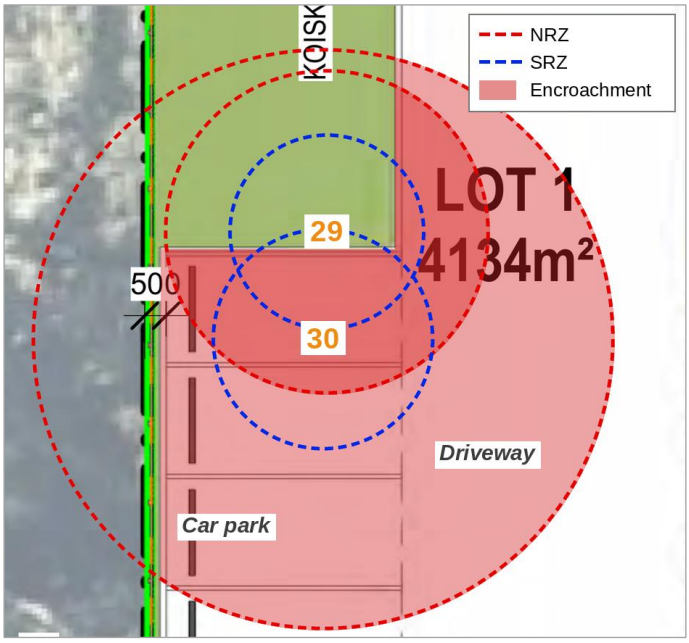


Figure 1: Trees 29 and 30 – NRZ (red), SRZ (blue) and encroachment of the proposed car park and driveway (shaded), based on the site plan (Brown Commercial Building Pty Ltd, Drawing 04, Revision 32).

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4 Discussion

4.1 Proximity of the works

Trees 29 and 30 are located in the north-western corner of the site. Tree 30 is located within a proposed car parking space, and Tree 29 is located at the edge of the car park, within the landscaped area. Combined, the car park and driveway encroach into approximately 57% of the NRZ of Tree 29 and 67% of the NRZ of Tree 30, and into approximately 46% and 95% of their SRZs respectively. An acoustic fence and 600 mm high retaining wall are also proposed along the western boundary, within the NRZ of Tree 30.

The proposed driveway, loading area and path are located in close proximity to Trees 37 and 38. Combined, the works encroach into approximately 35% of the NRZ of Tree 37 and 52% of the NRZ of Tree 38. The driveway encroaches into the SRZ of both trees, and the path also encroaches into the SRZ of Tree 38. The SRZ is the area around the base of a tree required for its stability in the ground (AS 4970–2025), and works within it would be expected to sever structural roots.

Encroachments of this size are well beyond what a tree is generally expected to tolerate. Large, mature trees are typically less able to tolerate and recover from root loss than younger trees, and tolerance varies between species (Matheny & Clark 1998; Roberts et al. 2006).

4.2 Soil conditions and expected root distribution

The subject site is located on the western Bellarine Peninsula. Much of the Bellarine Peninsula is covered by a thin (approximately 5 m) blanket of marine sand deposited during the late Neogene, around 4 million years ago (Dahlhaus & Currell 2013). Soils formed on these sands, known as the Moorabool Viaduct Formation, are typically texture-contrast (duplex) soils: a loamy sand to sandy loam topsoil approximately 300–500 mm deep over a dense, strongly sodic clay subsoil. The clay subsoil disperses in water and restricts root growth (Agriculture Victoria, Victorian Resources Online, soil pit SW94).

Tree roots grow where oxygen, moisture and nutrients are available, which is mainly the upper soil profile. The majority of a tree's root system, including the structural roots that anchor it and the fine roots that absorb water and nutrients, is generally found within the upper 600 mm or so of soil, and rooting depth is limited further where the subsoil is dense, poorly aerated or sodic (Perry 1982; Gilman 1990; Roberts et al. 2006; Day et al. 2010). In texture-contrast soils such as these, roots are expected to be concentrated within the sandy topsoil and the upper part of the clay subsoil.

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Given the close proximity of the works, the size and species of the trees and the soil conditions of the area, the roots of Trees 29, 30, 37 and 38 are expected to be present throughout the area of the proposed works, from ground level to approximately 600–700 mm below ground level.

4.3 Tree sensitive construction

As roots are expected to be present from ground level, any excavation within the area of the works is expected to sever roots. The only way Trees 29, 30, 37 and 38 could be expected to remain viable is if the driveway, car park, loading area and path were constructed above the existing ground level using permeable materials, with no excavation (for example, a cellular confinement system laid on geotextile over the existing soil surface, with permeable paving above). This would leave the roots undisturbed and allow water and air to continue to reach them.

However, the proposed site levels require excavation of approximately 400–500 mm below ground level for the driveway, car park and loading area, and approximately 200 mm below ground level for the path. This excavation falls within the main root zone of all four trees and would remove a large proportion of the roots within the area of the works, including roots within the SRZ. Above-grade construction is therefore not achievable based on the plans.

4.4 Root investigation

A non-destructive root investigation (for example, hydro-excavation or air-spade excavation along the alignment of the works) is normally used to determine whether significant roots are present within a proposed encroachment.

In this case, a root investigation is not considered practical. Based on the size of the trees, the extent of the encroachments and the soil conditions of the area, roots are already expected to be present throughout the area of the works, and an investigation would be likely to uncover vital roots. It would confirm, rather than change, the conclusion of this report, and the investigation itself would disturb the roots of all four trees.

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5 Conclusion

Based on the architectural plans prepared by Brown Commercial Building Pty Ltd (Site Plan, Drawing 04, Revision 32, dated 06/10/2026), it is not considered practical to retain Trees 29, 30, 37 and 38.

The proposed driveway, car park, loading area and path would require excavation within the main root zone of all four trees, including the SRZ, and the proposed site levels do not allow these works to be constructed above grade. A non-destructive root investigation is also not considered practical, as it is expected to uncover vital roots within the area of the works.

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6 References

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7 Limitation of Liability

TMC Reports and their employees are tree specialists who use their qualifications, education, knowledge, training, diagnostic tools and experience to examine trees, recommend measures to enhance the beauty and health of trees, and attempt to reduce the risk of living near trees. Clients may choose to accept or disregard the recommendations of this assessment and report.

Trees are living organisms that fail in ways the arboriculture industry does not fully understand. Conditions are often hidden within trees and below ground. Unless otherwise stated, observations have been made from ground level and limited to accessible components without dissection, excavation or probing. There is no guarantee that a tree will be healthy or safe under all circumstances, or for a specified period of time. Likewise, remedial treatments cannot be guaranteed.

Treatment, pruning and removal of trees may involve considerations beyond the scope of this report, such as property boundaries and ownership, disputes between neighbours, sight lines, landlord-tenant matters, and related incidents. Such issues cannot be taken into account unless complete and accurate information is given prior to or at the time of site inspection.

Information contained in this report covers those items that were examined and reflect the condition of those items at the time of inspection. There is no warranty or guarantee expressed or implied that the problems or deficiencies of the trees or property in question may not arise in the future. Trees can be managed, but they cannot be controlled. To live or work near a tree involves a degree of risk. The only way to eliminate all risks involved with a tree is to eliminate the tree.

All written reports must be read in their entirety, at no time shall part of the written assessment be referred to unless taken in full context of the whole written report.