City of Greater Geelong, Statutory Planning - Date Received 28/7/2026



TMC REPORTS

ARBORICULTURAL IMPACT ASSESSMENT

REPORT COMMISSIONED BY:
Dmck Planning

DATE OF ASSESSMENT:
Friday, November 28, 2025

SUBJECT SITE:
147 & 149 Bellarine Highway,
Newcomb, VIC 3219

DATE OF REPORT:
Friday, July 03, 2026

REPORT PREPARED BY:
[redacted]
Consulting Arborist
Diploma of Arboriculture
(AQF5)

VERSION 2

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1 Assignment

1.1 Author / Consulting Arborist

Name
[redacted]
Consulting Arborist
Diploma of Arboriculture (AQF5)

Company
TMC Reports
Phone
[redacted]
Email
info@tmcreports.com.au

1.2 Client

Name
Dmck Planning
Site Address
147 & 149 Bellarine Highway, Newcomb, VIC 3219

Intended Audience
- The property/tree owner(s)
- The development project manager and associated construction staff
- Council Planning Department

1.3 Brief

The purpose of this report is to provide an independent arboricultural assessment of prominent trees that are located within the subject site and within five metres of the site boundary lines.

Detail has been requested in relation to the following instructions:

- To assess the overall condition and retention value of the subject trees.
- To determine the Notional Root Zones (NRZ), Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) of the subject trees.
- To determine whether the subject trees are expected to remain viable following the proposed development.
- To propose recommendations that are expected to ensure that the subject trees would remain viable post construction.

1.4 Summary

- One tree (Tree 48) belongs to Geelong City Council.
- Five trees (Trees 24, 29, 30, 37, 38) are of moderate retention value.
- Forty-two trees (Trees 1 – 23, 25 - 28, 31 - 36, 39, 40 - 47) are of low retention value.
- Twelve trees (Trees 49 – 60) are neighbouring trees.
- Ten trees (Trees 11, 21, 24, 37, 38, 55, 57 – 60) are protected under Clause 52.17 Native Vegetation planning provision.
- Less invasive construction measures (8.3).
- Recommended tree protection measures (8.4).

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2 Data collection

2.1 Site visit

- [redacted], of TMC Reports, visited the site for an arboricultural assessment on Friday, November 28th 2025 at 1:00pm.

2.2 Method of data collection

- The subject trees were assessed from observations made as viewed from ground level.
- Access to neighbouring properties was not permitted. Assessment was therefore limited only to parts of the trees that were visible from within the subject site.
- A digital camera was used at ground level to obtain photographs within this report.
- The spreads of the trees were estimated.
- The heights of the trees were measured by using a Nikon Forestry Pro 2 Laser Range Finder.
- A circumference tape measure was used to determine the trunk dimensions of Trees 1 – 48, except where stated.
- Trunk dimensions of the neighbouring trees (Trees 49 – 60) were estimated due to restricted access.
- Encroachment percentages have been calculated via ArborCAD.

2.2.1 Documents viewed

- Site survey (01/07/2025)
- Proposed site plan (14/05/2026)
- Root Investigation Report (TMC Reports – 06/05/2026)
- Arboricultural Impact Assessment V1 (TMC Reports – 09/12/2025)
- Geelong City Council Planning Scheme
- Australian Standard AS4970 – 2025 'Protection of Trees on Development Sites'
- Australian Standard AS4373 – 2007 'Pruning of Amenity Trees'

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3 Site description

- The subject sites are located in a Low Density Residential Zone (LDRZ) within the Geelong Council.
- The subject site is comprised of two allotments under one contiguous ownership exceeding 4,000m^2, triggering Clause 52.17 Native Vegetation protection requirements.
- Multiple existing residential dwellings are located within the subject allotments.
- The terrain of the site appeared to be predominately flat.
- The subject trees are all located within the two subject allotments, the neighbouring nature strip, and the northern adjoining property (50 Coppards Road).
- No additional prominent vegetation (greater than 3m in height) was observed within five metres of the site boundary lines.

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4 Tree data

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
1	*Correa alba* White Correa	Semi Mature	Exotic	4.5 m	N-S 4.0 m E-W 4.0 m	0.22 m 0.69 m 0.10 m	Good	Fair/ poor	20+ years	Very Low	Low	2.6 m	1.5 m	No	Multi-stemmed at ground level.
2	*Duranta erecta* Pigeon Berry	Young	Exotic	3.6 m	N-S 7.0 m E-W 7.0 m	0.10 m 0.12 m 0.04 m 0.10 m (0.18 m) 0.31 m 0.38 m 0.13 m 0.31 m (1.13 m) 0.25 m	Good	Fair/ poor	20+ years	Very Low	Low	2.3 m	1.8 m	No	Multi-stemmed at ground level.
3	*Pittosporum undulatum* Sweet Pittosporum	Young	Native NSW QLD VIC	3.5 m	N-S 4.0 m E-W 4.0 m	0.08 m 0.04 m 0.04 m 0.04 m (0.10 m) 0.25 m 0.13 m 0.13 m 0.13 m (0.63 m) 0.17 m	Fair/ poor	Fair	5-10 years	Very Low	Low	2.0 m	1.6 m	No	Multi-stemmed at ground level. Chlorotic foliage.
4	*Jacaranda mimosifolia* Jacaranda	Semi Mature	Exotic	5.1 m	N-S 5.0 m E-W 5.0 m	0.20 m 0.12 m (0.23 m) 0.63 m 0.38 m (1.01 m) 0.35 m	Fair/ poor	Fair	5-10 years	Low	Low	2.8 m	2.1 m	No	Sparse canopy. Poor canopy regrowth.

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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
5	*Garrya elliptica*	Semi Mature	Exotic	3.5 m	N-S 4.0 m	0.10 m 0.10 m (0.14 m)	Fair/ poor	Fair	5-10 years	Low	Low	2.0 m	1.8 m	No	Chlorotic foliage.
						0.31 m 0.31 m (0.63 m)									
	Silk tassel bush				E-W 4.0 m	0.25 m									
6	*Ficus carica*	Mature	Exotic	4.8 m	N-S 9.0 m	0.25 m 0.25 m 0.18 m 0.14 m 0.15 m (0.44 m)	Good	Fair/ poor	20+ years	Low	Low	5.4 m	3.5 m	No	Multi-stemmed at ground level. Lifting pavers nearby.
						0.79 m 0.79 m 0.57 m 0.44 m 0.47 m (3.05 m)									
	Fig				E-W 9.0 m	1.15 m									
7	*Ficus carica*	Mature	Exotic	4.8 m	N-S 6.0 m	0.20 m 0.14 m 0.10 m (0.26 m)	Good	Fair/ poor	20+ years	Low	Low	3.2 m	2.1 m	No	Multi-stemmed at ground level.
						0.63 m 0.44 m 0.31 m (1.38 m)									
	Fig				E-W 6.0 m	0.35 m									
8	*Ficus carica*	Mature	Exotic	4.8 m	N-S 6.0 m	0.20 m 0.14 m 0.10 m (0.26 m)	Good	Fair/ poor	20+ years	Low	Low	3.2 m	2.1 m	No	Multi-stemmed at ground level.
						0.63 m 0.44 m 0.31 m (1.38 m)									
	Fig				E-W 6.0 m	0.35 m									

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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
9	*Acer negundo* 'Variegatum'	Mature	Exotic	7.0 m	N-S 7.0 m	0.28 m 0.28 m 0.10 m (0.40 m)	Fair/ good	Fair	20+ years	Low	Low	4.9 m	2.4 m	No	Existing dwelling within NRZ. Growing hard on boundary line. Co-dominant habit.
						0.88 m 0.88 m 0.31 m (2.07 m)									
	Ghost maple				E-W 7.0 m	0.45 m									
10	*Acer negundo*	Semi Mature	Exotic	3.2 m	N-S 4.0 m	0.08 m 0.08 m 0.08 m 0.04 m 0.04 m (0.14 m)	Fair	Fair	5-10 years	Low	Low	2.0 m	1.5 m	No	Insect damage in trunk.
						0.25 m 0.25 m 0.25 m 0.13 m 0.13 m (1.01 m)									
	Boxelder maple				E-W 4.0 m	0.15 m									
11	*Acacia mearnsii*	Mature	Native NSW TAS VIC	7.0 m	N-S 5.0 m	0.14 m 0.10 m 0.10 m 0.08 m (0.21m)	Fair/ good	Fair	10-20 years	Low	Low	3.8 m	2.3 m	Yes 52.17	Multi-stemmed at ground level. Insect damage. One stem has previously failed. Self-sown.
						0.44 m 0.31 m 0.31 m 0.25 m (1.32 m)									
	Black wattle				E-W 5.0 m	0.40 m									
12	*Prunus armeniaca*	Mature	Exotic	4.5 m	N-S 5.0 m	0.10 m 0.10 m 0.15 m (0.20 m)	Fair/ poor	Poor	5-10 years	Very Low	Low	2.5 m	1.8 m	No	Sparse canopy.
						0.31 m 0.31 m 0.47 m (1.10 m)									
	Apricot				E-W 5.0 m	0.25 m									

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
13	*Olea europaea*	Semi Mature	Exotic	3.5 m	N-S 5.0 m	0.08 m 0.08 m 0.08 m (0.13 m)	Fair/ good	Fair/ poor	10-20 years	Low	Low	2.0 m	1.7 m	No	Too many stems to practically measure or estimate. NRZ & SRZ have therefore been estimated.
						0.25 m 0.25 m 0.25 m (0.75 m)									
	Olive				E-W 5.0 m	0.20 m									
14	*Juglans regia*	Mature	Exotic	6.5 m	N-S 7.0 m	0.20 m 0.10 m 0.22 m (0.31 m)	Fair	Fair	5-10 years	Low	Low	3.8 m	2.3 m	No	Moderate decay in trunk. Co-dominant habit. Insect damage.
						0.63 m 0.31 m 0.69 m (1.63 m)									
	Common walnut				E-W 7.0 m	0.40 m									
15	*Prunus armeniaca*	Mature	Exotic	4.5 m	N-S 5.0 m	0.10 m 0.10 m 0.15 m (0.20 m)	Fair/ poor	Poor	5-10 years	Very Low	Low	2.5 m	1.8 m	No	Sparse canopy.
						0.31 m 0.31 m 0.47 m (1.10 m)									
	Apricot				E-W 5.0 m	0.25 m									
16	*Olea europaea*	Semi Mature	Exotic	3.5 m	N-S 5.0 m	0.08 m 0.08 m 0.08 m (0.13 m)	Fair/ good	Fair/ poor	10-20 years	Low	Low	2.0 m	1.7 m	No	Too many stems to practically measure or estimate. NRZ & SRZ have therefore been estimated.
						0.25 m 0.25 m 0.25 m (0.75 m)									
	Olive				E-W 5.0 m	0.20 m									
17	*Punica granatum*	Semi Mature	Exotic	4.0 m	N-S 4.0 m	0.10 m	Fair/ good	Fair/ poor	20+ years	Low	Low	2.0 m	1.5 m	No	Too many stems to practically measure or estimate. NRZ & SRZ have therefore been estimated.
						0.31 m									
	Pomegranate				E-W 4.0 m	0.15 m									

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18	*Prunus armeniaca*	Mature	Exotic	4.5 m	N-S 5.0 m	0.10 m 0.10 m 0.15 m (0.20 m)	Fair/ good	Poor	20+ years	Very Low	Low	2.5 m	1.8 m	No	Multi-stemmed at ground level. Sparse canopy. Too many stems to practically measure or estimate. NRZ & SRZ have therefore been estimated.
						0.31 m 0.31 m 0.47 m (1.10 m)									
	Apricot				E-W 5.0 m	0.25 m									
19	*Morus alba*	Semi Mature	Exotic	4.5 m	N-S 4.0 m	0.10 m 0.10 m 0.10 m (0.17 m)	Fair/ good	Fair	20+ years	Low	Low	2.1 m	1.6 m	No	Co-dominant habit.
						0.31 m 0.31 m 0.31 m (0.94 m)									
	White mulberry				E-W 4.0 m	0.17 m									
20	*Juglans regia*	Semi Mature	Exotic	3.5 m	N-S 4.0 m	0.08 m 0.07 m 0.08 m 0.02 m (0.13 m)	Fair/ good	Fair	10-20 years	Low	Low	2.0 m	1.6 m	No	Co-dominant habit.
						0.25 m 0.22 m 0.25 m 0.06 m (0.79 m)									
	Common walnut				E-W 4.0 m	0.17 m									
21	*Melaleuca lanceolata*	Mature	Native NSW SA VIC WA	6.5 m	N-S 12.0 m	0.32 m 0.24 m 0.20 m 0.21 m 0.24 m (0.54 m)	Fair/ poor	Very poor	5-10 years	Moderate	Low	6.6 m	2.6 m	Yes 52.17	Multi-stemmed at ground level. Historic failures. Split at union. Hanging over neighbouring dwelling. Horizontal habit.
						1.01 m 0.75 m 0.63 m 0.66 m 0.75 m (3.80 m)									
	Moonah				E-W 12.0 m	0.55 m									

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22	*Prunus armeniaca* Apricot	Mature	Exotic	4.5 m	N-S 5.0 m E-W 5.0 m	0.10 m 0.10 m 0.15 m (0.20 m) 0.31 m 0.31 m 0.47 m (1.10 m) 0.25 m	Fair/ good	Poor	20+ years	Very Low	Low	2.5 m	1.8 m	No	Multi-stemmed at ground level. Sparse canopy.
23	*Melaleuca armillaris* Bracelet Honey-myrtle	Semi Mature	Native	3.5 m	N-S 4.0 m E-W 4.0 m	0.10 m 0.31 m 0.15 m	Fair	Fair/ poor	10-20 years	Low	Low	2.0 m	1.5 m	No (exempt <10 years)	Too many stems to practically measure or estimate. NRZ & SRZ have therefore been estimated.
24	*Eucalyptus leucoxylon* 'Rosea' Red flowering yellow gum	Senescent	Native	8.0 m	N-S 6.0 m E-W 6.0 m	0.29 m 0.25 m (0.38 m) 0.91 m 0.79 m (1.70 m) 0.45 m	Poor	Very poor	5-10 years	Moderate	Moderate	4.5 m	2.3 m	Yes, 52.17	Co-dominant habit. Moderate decay in basal crown. Major deadwood throughout canopy (>8cm in diameter). Unable to properly see root crown as obscured with vegetation. Tree would need further assessment of root crown to determine full retention value.
25	*Fraxinus angustifolia subsp. angustifolia* Desert ash	Semi Mature	Exotic	3.5 m	N-S 3.0 m E-W 3.0 m	0.08 m 0.25 m 0.15 m	Fair	Fair/ good	20+ years	Low	Low	2.0 m	1.5 m	No	
26	*Fraxinus angustifolia subsp. angustifolia* Desert ash	Semi Mature	Exotic	6.0 m	N-S 5.0 m E-W 5.0 m	0.17 m 0.53 m 0.25 m	Fair/ good	Fair/ good	20+ years	Low	Low	2.0 m	1.8 m	No	
27	*Eucalyptus camaldulensis* River red gum	Semi Mature	Native NSW QLD SA VIC	5.5 m	N-S 4.0 m E-W 4.0 m	0.17 m 0.10 m 0.15 m (0.24 m) 0.53 m 0.31 m 0.47 m (1.32 m) 0.30 m	Fair/ good	Fair/ poor	20+ years	Low	Low	3.0 m	2.0 m	No (exempt <10 years)	Multi-stemmed at ground level.

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
28	*Eucalyptus camaldulensis* River red gum	Semi Mature	Native NSW QLD SA VIC	5.5 m	N-S 4.0 m E-W 4.0 m	0.17 m 0.10 m 0.15 m (0.24 m) 0.53 m 0.31 m 0.47 m (1.32 m) 0.30 m	Fair/ poor	Fair/ poor	20+ years	Low	Low	3.0 m	2.0 m	No (exempt <10 years)	Multi-stemmed at ground level. Insect damage. Historically lopped. Comprised of epicormic shoots.
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.
31	*Acacia melanoxylon* Blackwood	Young	Native NSW QLD SA TAS VIC	3.2 m	N-S 1.0 m E-W 1.0 m	0.04 m 0.13 m 0.07 m	Good	Good	10-20 years	Very Low	Low	2.0 m	1.5 m	No (exempt <10 years)	Self-sown x 2.
32	*Eucalyptus gomphocephala* Tuart	Semi Mature	Native WA	4.1 m	N-S 2.0 m E-W 2.0 m	0.08 m 0.25 m 0.25 m	Very poor	Very poor	0-5 years	Very Low	Low	2.0 m	1.8 m	No	4 trees of the same species. Epicormic shoots growing from basal lopping.
33	*Eucalyptus gomphocephala* Tuart	Semi Mature	Native WA	4.1 m	N-S 2.0 m E-W 2.0 m	0.08 m 0.25 m 0.25 m	Very poor	Very poor	0-5 years	Very Low	Low	2.0 m	1.8 m	No	7 trees of the same species. Epicormic shoots growing from basal lopping.
34	*Eucalyptus globulus subsp. globulus* Southern blue gum	Semi Mature	Native NSW TAS VIC	5.5 m	N-S 4.0 m E-W 4.0 m	0.13 m 0.13 m 0.13 m 0.13 m (0.26 m) 0.41 m 0.41 m 0.41 m 0.41 m (1.63 m) 0.40 m	Poor	Very poor	5-10 years	Low	Low	3.1 m	2.3 m	No (exempt regrowth)	Moderate decay in trunk. Insect damage. Epicormic shoots coming from basal lopping.

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35	*Fraxinus angustifolia subsp. angustifolia*	Young	Exotic	5.1 m	N-S 4.0 m	0.08 m 0.06 m 0.06 m 0.06 m (0.13 m)	Good	Very poor	10-20 years	Very Low	Low	2.0 m	1.5 m	No	Epicormic shoots from basal lopping.
						0.25 m 0.19 m 0.19 m 0.19 m (0.82 m)									
	Desert ash				E-W 4.0 m	0.20 m									
36	*Eucalyptus sideroxylon*	Semi Mature	Native NSW QLD VIC	5.1 m	N-S 4.0 m	0.13 m 0.13 m 0.10 m 0.10 m (0.23 m)	Fair/ poor	Poor	5-10 years	Low	Low	2.8 m	1.8 m	No (exempt <10 years)	Growing on a lean. Insect damage. Growing from large lopped stump. Leaf decay
						0.41 m 0.41 m 0.31 m 0.31 m (1.45 m)									
	Red ironbark				E-W 4.0 m	0.25 m									
37	*Eucalyptus camaldulensis*	Mature	Native NSW QLD SA VIC	12.0 m	N-S 8.0 m	0.65 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.
						2.04 m									
	River red gum				E-W 8.0 m	0.75 m									
38	*Eucalyptus camaldulensis*	Mature	Native NSW QLD SA VIC	12.0 m	N-S 8.0 m	0.80 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.
						2.51 m									
	River red gum				E-W 8.0 m	0.78 m									

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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
39	*Coprosma repens* Mirror bush	Mature	Exotic	12.0 m	N-S 3.0 m E-W 3.0 m	0.10 m 0.31 m 0.12 m	Good	Fair	10-20 years	Very Low	Low	2.0 m	1.5 m	No	7 trees of the same species.
40	*Melaleuca nesophila* Pink melaleuca	Semi Mature	Native WA	4.1 m	N-S 4.0 m E-W 4.0 m	0.10 m 0.31 m 0.12 m	Fair/ good	Fair/ poor	10-20 years	Low	Low	2.0 m	1.5 m	No	
41	*Cotoneaster sp.* Cotoneaster	Semi Mature	Exotic	4.5 m	N-S 5.0 m E-W 5.0 m	0.08 m 0.04 m 0.07 m 0.08 m (0.13 m) 0.25 m 0.13 m 0.22 m 0.25 m (0.85 m) 0.12 m	Good	Fair/ poor	10-20 years	Low	Low	2.0 m	1.5 m	No	Multi-stemmed at ground level.
42	*Eucalyptus gomphocephala* Tuart	Mature	Native WA	12.0 m	N-S 8.0 m E-W 8.0 m	0.55 m 0.57 m 0.55 m (0.96 m) 1.73 m 1.79 m 1.73 m (5.25 m) 1.15 m	Fair/ poor	Poor	5-10 years	Moderate	Low	11.6 m	3.5 m	No	Co-dominant stems at ground level. Crown dieback. Heavily lopped. Crown comprised entirely of epicormic shoots.
43	*Melaleuca styphelioides* Prickly paperbark	Semi Mature	Native NSW QLD VIC	5.1 m	N-S 7.0 m E-W 7.0 m	0.42 m 1.32 m 0.47 m	Fair/ poor	Fair	5-10 years	Low	Low	5.0 m	2.4 m	No	Moderate deadwood in understory. Native to Victoria but not endemic to region.
44	*Eucalyptus cladocalyx* Sugar gum	Senescent	Native SA	10.1 m	N-S 8.0 m E-W 8.0 m	0.65 m 0.30 m 0.20 m (0.74 m) 2.04 m 0.94 m 0.63 m (3.61 m) 1.25 m	Fair / Poor	Poor	5-10 years	Moderate	Low	8.9 m	3.6 m	No	Co-dominant stems at ground level. Major decay in trunk. Existing road within NRZ. Overhanging road. Bees colonising tree, unable to get close. Trunk measurements have therefore been estimated.

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
45	*Eucalyptus gomphocephala* Tuart	Mature	Native WA	5.5 m	N-S 7.0 m E-W 7.0 m	0.92 m 2.89 m 1.01 m	Very poor	Poor	0-5 years	Moderate	Low	11.0 m	3.3 m	No	Major dieback. Historically lopped. Canopy comprised entirely of epicormic shoots
46	*Callistemon citrinus* Crimson Bottlebrush	Semi Mature	Native NSW QLD VIC	4.5 m	N-S 7.0 m E-W 7.0 m	0.10 m 0.10 m 0.10 m 0.10 m (0.20 m) 0.31 m 0.31 m 0.31 m 0.31 m (1.26 m) 0.40 m	Fair/ poor	Fair/ poor	5-10 years	Low	Low	2.4 m	2.3 m	No	Multi-stemmed at ground level. Historic failures.
47	*Cupressus sempervirens* Mediterranean cypress	Mature	Exotic	4.5 m	N-S 1.7 m E-W 1.7 m	0.10 m 0.31 m 0.12 m	Good	Good	20+ years	Low	Low	2.0 m	1.5 m	No	2 trees of the same species.
48	*Allocasuarina verticillata* Drooping sheoak	Semi Mature	Native	4.5 m	N-S 4.0 m E-W 4.0 m	0.21 m 0.66 m 0.28 m	Fair	Fair/ poor	5-10 years	Low	Council Owned Tree	2.5 m	1.9 m	Council Owned Tree	Council owned tree situated within the front nature strip. Existing driveway within NRZ. Historic lopping. Canopy comprised of epicormic shoots.
49	*Acacia melanoxylon* Blackwood	Semi Mature	Native NSW QLD SA TAS VIC	4.5 m	N-S 4.0 m E-W 4.0 m	0.22 m 0.69 m 0.23 m	Fair	Fair	10-20 years	Low	Neighbouring Tree	2.6 m	1.8 m	No (exempt <10 years)	Historic lopping.
50	*Allocasuarina verticillata* Drooping sheoak	Young	Native	5.1 m	N-S 4.0 m E-W 4.0 m	0.12 m 0.38 m 0.15 m	Fair	Fair/ poor	5-10 years	Low	Neighbouring Tree	2.0 m	1.5 m	No (exempt <10 years)	Neighbouring tree located within the northern adjoining property (50 Coppards Road). Sparse canopy.
51	*Acacia mearnsii* Black wattle	Semi Mature	Native NSW TAS VIC	4.5 m	N-S 6.0 m E-W 6.0 m	0.10 m 0.31 m 0.12 m	Fair	Fair	10-20 years	Low	Neighbouring Tree	2.0 m	1.5 m	No (exempt <10 years)	Neighbouring tree located within the northern adjoining property (50 Coppards Road).

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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
52	*Corymbia citriodora* Lemon-scented gum	Mature	Native NSW QLD	8.5 m	N-S 12.0 m E-W 12.0 m	0.22 m 0.19 m (0.29 m) 0.69 m 0.60 m (1.29 m) 0.35 m	Good	Fair	20+ years	High	Neighbouring Tree	3.5 m	2.1 m	No	Neighbouring tree located within the northern adjoining property (50 Coppards Road). Historic failures. Overhanging subject site.
53	*Allocasuarina verticillata* Drooping sheoak	Young	Native	5.1 m	N-S 4.0 m E-W 4.0 m	0.12 m 0.38 m 0.15 m	Fair	Fair/ poor	5-10 years	Low	Neighbouring Tree	2.0 m	1.5 m	No (exempt <10 years)	3 trees of the same species. Neighbouring trees located within the northern adjoining property (50 Coppards Road). Sparse canopy.
54	*Eucalyptus gomphocephala* Tuart	Mature	Native WA	15.0 m	N-S 6.0 m E-W 6.0 m	0.68 m 0.22 m (0.71 m) 2.14 m 0.69 m (2.83 m) 0.75 m	Good	Fair/ good	20+ years	High	Neighbouring Tree	8.6 m	2.9 m	No	Neighbouring trees located within the northern adjoining property (50 Coppards Road).
55	*Allocasuarina verticillata* Drooping sheoak	Semi Mature	Native	6.0 m	N-S 4.0 m E-W 4.0 m	0.22 m 0.69 m 0.28 m	Good	Good	10-20 years	Low	Neighbouring Tree	2.6 m	1.9 m	Yes 52.17	Neighbouring trees located within the northern adjoining property (50 Coppards Road).
56	*Eucalyptus gomphocephala* Tuart	Mature	Native WA	11.0 m	N-S 6.0 m E-W 6.0 m	0.45 m 0.45 m (0.63 m) 1.41 m 1.41 m (2.83 m) 0.85 m	Good	Fair	20+ years	High	Neighbouring Tree	7.6 m	3.1 m	No	Neighbouring trees located within the northern adjoining property (50 Coppards Road).
57	*Eucalyptus camaldulensis* River red gum	Mature	Native NSW QLD SA VIC	8.0 m	N-S 6.0 m E-W 6.0 m	0.50 m 1.57 m 0.60 m	Good	Fair/ good	20+ years	High	Neighbouring Tree	6.0 m	2.7 m	Yes 52.17	Neighbouring trees located within the northern adjoining property (50 Coppards Road).
58	*Eucalyptus camaldulensis* River red gum	Mature	Native NSW QLD SA VIC	8.0 m	N-S 6.0 m E-W 6.0 m	0.40 m 1.26 m 0.45 m	Good	Fair/ good	20+ years	High	Neighbouring Tree	4.8 m	2.4 m	Yes 52.17	Neighbouring trees located within the northern adjoining property (50 Coppards Road).

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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
59	*Allocasuarina verticillata*	Semi Mature	Native	6.0 m	N-S 5.0 m	0.15 m	Fair	Fair/ good	20+ years	Low	Neighbouring Tree	2.0 m	1.6 m	Yes 52.17	Neighbouring trees located within the northern adjoining property (50 Coppards Road).
						0.47 m									
	Drooping sheoak				E-W 5.0 m	0.18 m									
60	*Acacia melanoxylon*	Semi Mature	Native NSW QLD SA TAS VIC	4.5 m	N-S 3.0 m	0.10 m	Good	Fair/ good	20+ years	Low	Neighbouring Tree	2.0 m	1.5 m	Yes 52.17	Neighbouring trees located within the northern adjoining property (50 Coppards Road).
						0.31 m									
	Blackwood				E-W 3.0 m	0.12 m									

**Tree Protection Zones (10.1) are identical to the Notional Root Zones (NRZ) unless states otherwise.*

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4.1 Photographic evidence



Tree 1



Tree 2



Tree 3



Tree 4



Tree 5



Tree 6



Tree 7



Tree 8



Tree 9



Tree 10



Tree 11



Tree 12



Tree 13



Tree 14



Tree 15



Tree 16



Tree 17



Tree 18



Tree 19



Tree 20



Tree 21



Tree 21 - basal union



Tree 21 - split



Tree 22



Tree 23



Tree 24



Tree 24 base



Tree 25



Tree 26



Tree 27



Tree 28



Tree 29



Tree 30



Tree 31



Tree 32



Tree 33 group



Tree 33 group continued



Tree 34



Tree 35



Tree 36

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Tree 37



Tree 37 – basal growth



Tree 37 – historic pruning



Tree 38



Tree 38 growing conditions



Tree 39 group nothern side



Tree 39 group southern side



Tree 40



Tree 41



Tree 42



Tree 43



Tree 44



Tree 45



Tree 46



Tree 47 west



Tree 47 east



Tree 48



Tree 49



Tree 50



Tree 51



Tree 52



Tree 53



Tree 54



Tree 55



Tree 56



Tree 57



Tree 58



Tree 59



Tree 60



Site 147 as viewed from Bellarine Highway



Site 147 existing driveway and eastern border



Site 147 as viewed from Bellarine Highway



Site 147 existing driveway as viewed from the south



Site 147 existing driveway as viewed from the north



Site 147 rear yard as viewed from the north



Site 147 rear yard as viewed from south-west



Site 147 existing driveway as viewed from the south



Site 147 rear yard as viewed from south-west



Site 147 rear yard as viewed from south-east



Sites 147 – 149 boundary viewed from the west



Site 149 viewed from south



149 Rear yard viewed from north



Site 149 viewed from Bellarine Highway



Site 149 viewed from Bellarine Highway



Site 149 eastern border



Site 149 eastern border



Site 149 eastern border

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5 Site maps

5.1 Existing conditions

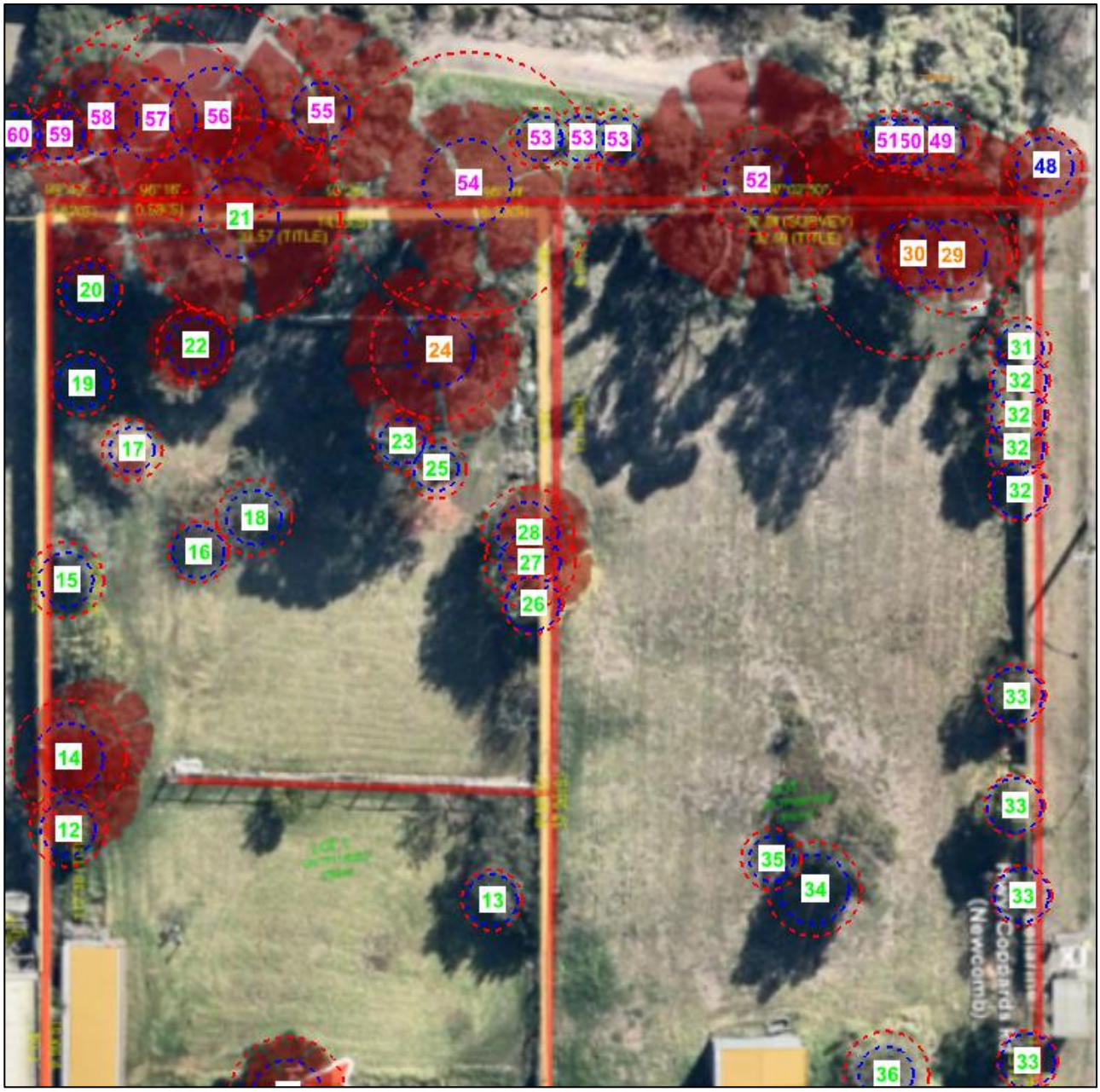
The following map indicates the approximate tree locations in relation to the existing conditions:



LEGEND					
#	LOW RETENTION VALUE	#	COUNCIL OWNED TREE	◌	NOTIONAL ROOT ZONE
#	MODERATE RETENTION VALUE	#	NEIGHBOURING TREE	◌	STRUCTURAL ROOT ZONE
#	HIGH RETENTION VALUE				

5.1.1 Northern context

The following map indicates the approximate tree locations in relation to the existing conditions within the northern half of the subject site:



LEGEND					
#	LOW RETENTION VALUE	#	COUNCIL OWNED TREE	◌	NOTIONAL ROOT ZONE
#	MODERATE RETENTION VALUE	#	NEIGHBOURING TREE	◌	STRUCTURAL ROOT ZONE
#	HIGH RETENTION VALUE				

5.1.2 Southern context

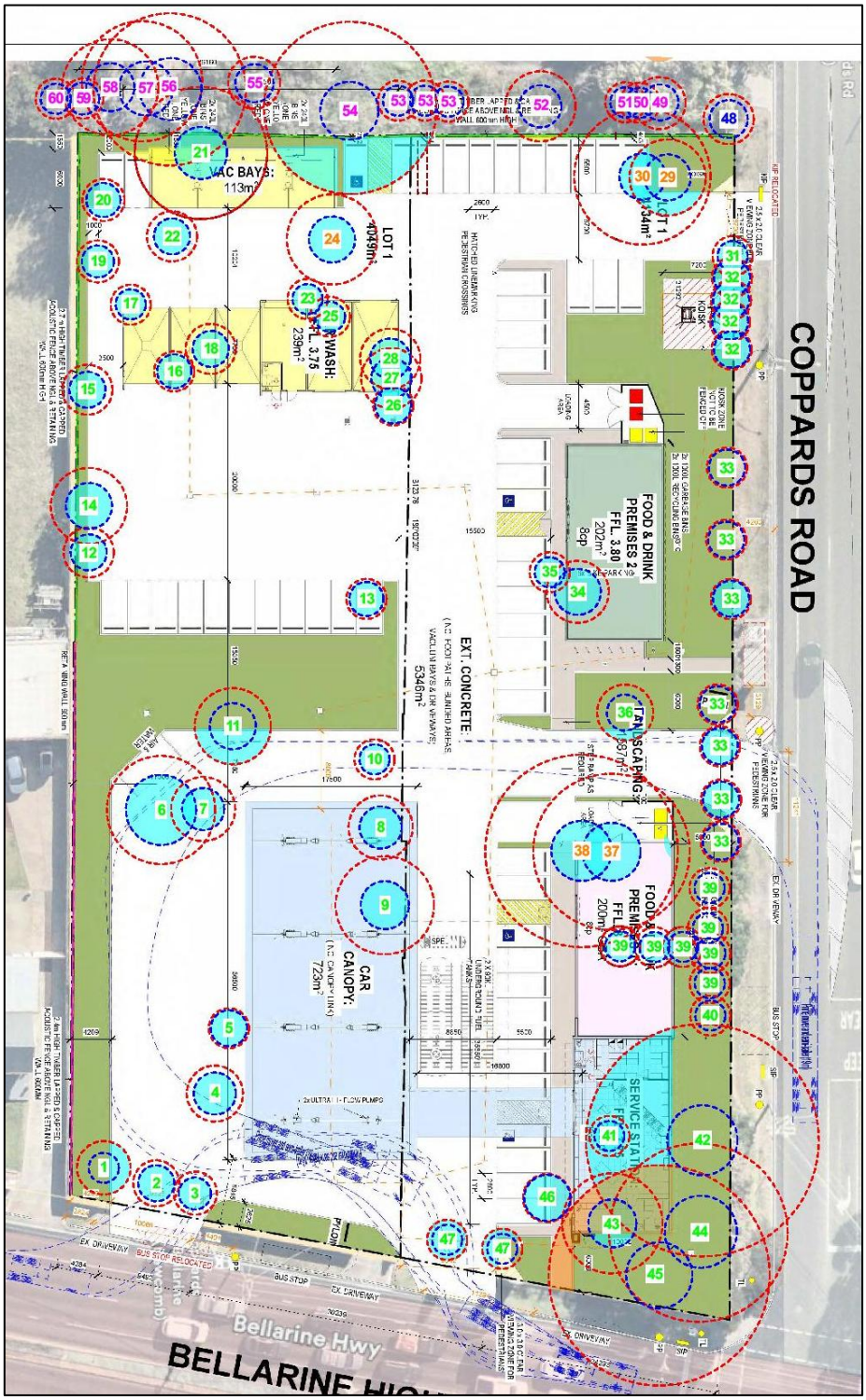
The following map indicates the approximate tree locations in relation to the existing conditions within the southern half of the subject site:



LEGEND					
#	LOW RETENTION VALUE	#	COUNCIL OWNED TREE	◌	NOTIONAL ROOT ZONE
#	MODERATE RETENTION VALUE	#	NEIGHBOURING TREE	◌	STRUCTURAL ROOT ZONE
#	HIGH RETENTION VALUE				

5.2 Proposed plan

The following map indicates the approximate tree locations in relation to the proposed plans (text size exaggerated for readability):



LEGEND					
#	LOW RETENTION VALUE	#	COUNCIL OWNED TREE		NOTIONAL ROOT ZONE
#	MODERATE RETENTION VALUE	#	NEIGHBOURING TREE		STRUCTURAL ROOT ZONE
#	HIGH RETENTION VALUE				
	MINOR ENCROACHMENT		MODERATE ENCROACHMENT		MAJOR ENCROACHMENT

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6 Discussion

6.1 Minor encroachment

A proposed encroachment is considered to be ‘minor’ if works (structures, surfaces, site cuts, underground services, fill etc.) are proposed to encroach into the NRZ by 10% or less and is outside the SRZ.

Generally, trees are likely to tolerate minor encroachments. However, tolerance can vary depending on several factors such as tree age, species, health, existing conditions etc. (refer to section 10.9 for more details).

6.2 Moderate encroachment

A proposed encroachment is considered to be ‘moderate’ if it is greater than 10% and less than or equal to 20% of the area of the NRZ and is outside of the SRZ.

It is possible that a tree could tolerate a moderate encroachment. However, tolerance can vary depending on several factors such as tree age, species, health, existing conditions etc. (refer to section 10.9 for more details).

In some situations less invasive construction measures such as permeable paving, less invasive footings or arborist supervision may be required.

6.3 Major encroachment

A proposed encroachment is considered to be ‘major’ if it is greater than 20% of the area of the NRZ or inside the SRZ.

Generally, trees are less likely to tolerate major encroachments. However, tolerance can vary depending on several factors such as tree age, species, health, existing conditions etc. (refer to section 10.9 for more details).

In some situations less invasive construction measures or a non-destructive root investigation (10.8) may be required to assess the tree’s root system and determine if the tree is expected to tolerate the loss of roots that may need to be pruned in order to accommodate the proposed design.

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7 Conclusion

7.1 Tree retention value

7.1.1 Council owned tree

The following tree belongs to Geelong City Council:

- Tree 48

7.1.2 Low retention value

The following trees are considered to be of low retention value as they are relatively small specimens that are insignificant to the landscape:

- Tree 1
- Tree 2
- Tree 3
- Tree 4
- Tree 5
- Tree 6
- Tree 7
- Tree 8
- Tree 9
- Tree 10
- Tree 11
- Tree 12
- Tree 13
- Tree 14
- Tree 15
- Tree 16
- Tree 17
- Tree 18
- Tree 19
- Tree 20
- Tree 22
- Tree 23
- Tree 25
- Tree 26
- Tree 27
- Tree 28
- Tree 31
- Tree 32
- Tree 33
- Tree 34
- Tree 35
- Tree 36
- Tree 39
- Tree 40
- Tree 41
- Tree 43
- Tree 46
- Tree 47

The following trees are to be considered moderate amenity value, however are classed as low retention value due to poor health and / or significant structural defects:

- Tree 21
- Tree 42
- Tree 44
- Tree 45

7.1.3 Moderate retention value

The following trees are considered to be of moderate retention value as they are moderate sized specimens that are growing in a prominent location:

- Tree 24
- Tree 29
- Tree 30
- Tree 37
- Tree 38

7.1.4 Neighbouring trees

The following trees do not belong to the property owner:

- Tree 49
- Tree 50
- Tree 51
- Tree 52
- Tree 53
- Tree 54
- Tree 55
- Tree 56
- Tree 57
- Tree 58
- Tree 59
- Tree 60

7.2 Permit requirements

7.2.1 Clause 52.17 'Native Vegetation'

The combined subject sites trigger a Clause 52.17 Native Vegetation Planning Provision within the Geelong Council, as they are over 4000m_2 in size.

Under Clause 52.17, native trees require a Victorian planning permit to remove destroy or lop. This clause does not apply to vegetation that was either planted or grown as a result of direct seeding, nor does it apply to naturally-regenerated vegetation that is less than 10 years old.

This exemption does not apply to native vegetation planted or managed with public funding for the purpose of land protection or enhancing biodiversity unless the removal, destruction or lopping of the native vegetation is in accordance with written permission of the agency (or its successor) that provided the funding.

7.2.2 Vehicle Crossings (Neighbourhood Amenity Local Law)

Any changes to an existing vehicle crossing i.e. relocation, widening, etc or if an additional vehicle crossing is requested the property owner/contractor is required to gain approval from Council's Works Inspectors.

Further, if the Inspector gives approval for the alterations to the vehicle crossing or approval for a new vehicle crossing the contractor will need to obtain a Vehicle Crossing Permit.

Also, in general, the following applies to all vehicle crossings:

- must be at least 1.0 metre away from any tree, power pole, drain, etc

7.2.3 Trees subject to permit requirements

A permit is required to remove, destroy, or lop the following native vegetation under Clause 52.17 of the Victoria Planning Provisions:

- Tree 11
- Tree 21
- Tree 24
- Tree 37
- Tree 38
- Tree 55
- Tree 57
- Tree 58
- Tree 59
- Tree 60

The following tree belongs to Geelong Council and must not be pruned or removed except by Council staff or contractors:

- Tree 48

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7.3 Impact assessment

The following table represents the encroachments of the proposed development:

Tree No.	Encroachment	NRZ encroachment	SRZ encroachment	Encroachment category	Proposed retention
1	Driveway	31.3%	27.7%	Major	Remove
2	Driveway	Entire	Entire	Major	Remove
3	Driveway	Entire	Entire	Major	Remove
4	Driveway	Entire	Entire	Major	Remove
5	Driveway	Entire	Entire	Major	Remove
6	Driveway	Entire	Entire	Major	Remove
7	Driveway	Entire	Entire	Major	Remove
8	Fuel pumps	Entire	Entire	Major	Remove
9	Fuel pumps	Entire	Entire	Major	Remove
10	Driveway	Entire	Entire	Major	Remove
11	Driveway	45.4%	42.6%	Major	Remove
12	Driveway	Entire	Entire	Major	Remove
13	Carpark	Entire	Entire	Major	Remove
14	Driveway	Entire	Entire	Major	Remove
15	Driveway	Entire	Entire	Major	Remove
16	Car wash	Entire	Entire	Major	Remove
17	Car wash	Entire	Entire	Major	Remove
18	Car wash	Entire	Entire	Major	Remove
19	Driveway	Entire	Entire	Major	Remove
20	Carpark	Entire	Entire	Major	Remove
21	Vac bays	Entire	Entire	Major	Remove
22	Driveway	Entire	Entire	Major	Remove
23	Car wash	Entire	Entire	Major	Remove
24	Driveway	Entire	Entire	Major	Remove
25	Car wash	Entire	Entire	Major	Remove
26	Driveway	Entire	Entire	Major	Remove
27	Car wash	Entire	Entire	Major	Remove
28	Car wash	Entire	Entire	Major	Remove
29	Driveway & carpark	44.4%	21.3%	Major	Remove
30	Carpark	Entire	Entire	Major	Remove
31	Driveway	Entire	Entire	Major	Remove
32	Kiosk (maximum)	Entire	Entire	Major	Remove
33	Driveway (max)	Entire	Entire	Major	Remove
34	Retail shop	Entire	Entire	Major	Remove
35	Carpark	Entire	Entire	Major	Remove
36	Driveway	15.5%	2.1%	Major	Remove
37	Retail shop	Entire	Entire	Major	Remove
38	Retail shop	Entire	Entire	Major	Remove
39	Retail shop (max)	Entire	Entire	Major	Remove
40	NA	0.0%	0.0%	NA	Remove
41	Service station	Entire	Entire	Major	Remove
42	Service station & retail shop	32.6%	2.9%	Major	Remove
43	Service station	Entire	Entire	Major	Remove
44	Service station	14.7%	3.1%	Major	Remove

Tree No.	Encroachment	NRZ encroachment	SRZ encroachment	Encroachment category	Proposed retention
45	Service station and path	19.0%	0.0%	Moderate	Remove
46	Car park	Entire	Entire	Major	Remove
47	Driveway & path (max)	Entire	Entire	Major	Remove
48	NA	0.0%	0.0%	NA	Retain
49	NA	0.0%	0.0%	NA	Retain
50	NA	0.0%	0.0%	NA	Retain
51	NA	0.0%	0.0%	NA	Retain
52	Car park	3.3%	0.0%	Minor	Retain
53	N/A	0.0%	0.0%	N/A	Retain
54	Carpark and Vac bays	24.7%	1.0%	Major	Retain
55	NA	0.0%	0.0%	NA	Retain
56	Carpark & Vac bays	6.5%	0.0%	Minor	Retain
57	N/A	0.0%	0.0%	N/A	Retain
58	N/A	0.0%	0.0%	N/A	Retain
59	NA	0.0%	0.0%	NA	Retain
60	NA	0.0%	0.0%	NA	Retain

Note: encroachment calculations are based on the proposed footprint. Further clarification of the impact on roots beyond the proposed footprint can be found in section 7.3.4 where relevant

7.3.1 No encroachment

Development is not proposed to encroach into the NRZ or SRZ of the following trees:

- Tree 40
- Tree 48
- Tree 49
- Tree 50
- Tree 51
- Tree 53
- Tree 55
- Tree 57
- Tree 58
- Tree 59
- Tree 60

The proposed development is not expected to compromise the long-term viability of the above-mentioned trees.

Less invasive construction measures or development redesign are therefore not required to ensure that these trees would remain viable post construction.

7.3.2 Minor encroachment

The proposed development is considered to be a minor encroachment according to section 3.3.4 of the Australian Standard AS4970 – 2025 ‘Protection of Trees on Development Sites’ of the following trees:

- Tree 52
- Tree 56

The proposed development is not expected to compromise the health and/or structural integrity of the above-mentioned trees.

Less invasive construction measures or development redesign are therefore not required to ensure that these trees remain viable post construction.

7.3.3 Moderate encroachment

The proposed development is considered to be a moderate encroachment according to section 3.3.5 of the Australian Standard AS4970 – 2025 'Protection of Trees on Development Sites' of the following trees:

- Tree 45

Tree 45	
Encroachment	• The footprint of the service station is a 19.0% encroachment into the NRZ and 0% into the SRZ. • This is considered a moderate encroachment (6.2).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions

7.3.4 Major encroachment

The proposed development is considered to be a major encroachment according to section 3.3.6 of the Australian Standard AS4970 – 2025 'Protection of Trees on Development Sites' of the following trees:

- Tree 1
- Tree 2
- Tree 3
- Tree 4
- Tree 5
- Tree 6
- Tree 7
- Tree 8
- Tree 9
- Tree 10
- Tree 11
- Tree 12
- Tree 13
- Tree 14
- Tree 15
- Tree 16
- Tree 17
- Tree 18
- Tree 19
- Tree 20
- Tree 21
- Tree 22
- Tree 23
- Tree 24
- Tree 25
- Tree 26
- Tree 27
- Tree 28
- Tree 29
- Tree 30
- Tree 31
- Tree 32
- Tree 33
- Tree 34
- Tree 35
- Tree 36
- Tree 37
- Tree 38
- Tree 39
- Tree 41
- Tree 42
- Tree 43
- Tree 44
- Tree 46
- Tree 47
- Tree 54

Tree 1	
Encroachment	• The footprint of the driveway is a 31.3% encroachment into the NRZ and 27.7% into the SRZ. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Trees 2, 3, 4, 5, 6 & 7	
Encroachment	• These trees are all located within the footprint of the driveway spread across the subject site. • These are considered to be major encroachments (6.3).
Retention value	• These trees are all of low retention value.
Proposed retention	• These trees are proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• These trees are not subject to known permit restrictions.

Tree 8 & 9	
Encroachment	• These trees are located within the footprint of the fuel pumps. • These are considered to be major encroachments (6.3).
Retention value	• These trees are all of low retention value
Proposed retention	• These trees are proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• These trees are not subject to known permit restrictions.

Tree 10	
Encroachment	• The tree is located within the footprint of the driveway. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 11	
Encroachment	• The footprint of the driveway and carparking is a 45.4% encroachment into the NRZ and 42.6% into the SRZ. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is protected under Clause 52.17.

Tree 12	
Encroachment	• The tree is located within the footprint of the driveway. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 13	
Encroachment	• The tree is located within the footprint of the carpark. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Trees 14, 15, 19, 22, 24 and 26	
Encroachment	• These trees are all located within the footprint of the driveway. • These are considered to be major encroachments (6.3).
Retention value	• These trees are all of low retention value.
Proposed retention	• These trees are all proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• Trees 14 – 22 & 26 are not subject to known permits • Tree 24 is subject to Clause 52.17 restrictions.

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Tree 21	
Encroachment	• This tree is located within the footprint of the vac bays. • This is considered to be a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• This tree is subject to Clause 52.17 restrictions.

Trees 16, 17, 18, 23, 25, 27 and 28	
Encroachment	• These trees are all located within the footprint of the car wash. • These are considered to be major encroachments (6.3).
Retention value	• These trees are all of low retention value.
Proposed retention	• These trees are all proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• These trees are not subject to known permit restrictions.

Tree 29	
Encroachment	• The footprint of the driveway and carpark is a combined 44.4% encroachment into the NRZ and 21.3% into the SRZ. • This is considered a major encroachment (6.3).
Retention value	• This tree is of moderate retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 30	
Encroachment	• This tree is located within the footprint of the carpark. • This is considered to be major encroachment (6.3).
Retention value	• This tree is of moderate retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• This tree is not subject to known permit restrictions.

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Trees 31	
Encroachment	• This tree is located within the footprint of the driveway. • This is considered to be a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 32	
Encroachment	• These trees are all located within the footprint of the proposed kiosk. • These are considered to be major encroachments (6.3).
Retention value	• This tree group is of low retention value.
Proposed retention	• This tree group is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree group is not subject to known permit restrictions

Tree 33	
Encroachment	• These trees are all located within the footprint of the driveway spread across the subject site. • These are considered to be major encroachments (6.3).
Retention value	• These trees are all of low retention value.
Proposed retention	• These trees are proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• These trees are not subject to known permit restrictions.

Tree 34	
Encroachment	• This tree is located within the footprint of the retail shop. • These are considered to be major encroachments (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 35	
Encroachment	• This tree is located within the footprint of the carpark. • These are considered to be major encroachments (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 36	
Encroachment	• The footprint of the driveway is a 15.5% encroachment into the NRZ and 2.1% into the SRZ. • This is considered a major encroachment (6.3).
Retention value	• This tree is of moderate retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 37 & 38	
Encroachment	• These trees are located within the footprint of the retail shop. • These are considered to be major encroachments (6.3).
Retention value	• These trees are of moderate retention value.
Proposed retention	• These trees are proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• These trees are subject to Clause 52.17 restrictions.

Trees 39 & 41	
Encroachment	• These trees are located within the footprint of either the service station or retail shop. • These are considered to be major encroachments (6.3).
Retention value	• These trees are of low retention value.
Proposed retention	• These trees are proposed to be removed. • Less invasive construction measures or development redesign are therefore not required.
Permits	• These trees are not subject to known permit restrictions

Tree 42	
Encroachment	• The footprint of the service station and retail shop is a combined 32.6% encroachment into the NRZ and 2.9% into the SRZ. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.
Tree 43	
Encroachment	• The tree is located within the footprint of the service station. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 44	
Encroachment	• The footprint of the service station is a 14.7% encroachment into the NRZ and 3.1% into the SRZ. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

Tree 46	
Encroachment	• The tree is located within the footprint of the carpark. • This is considered a major encroachment (6.3).
Retention value	• This tree is of low retention value.
Proposed retention	• This tree is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree is not subject to known permit restrictions.

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Tree 47	
Encroachment	• The tree group is located within the footprint of the driveway and path. • This is considered a major encroachment (6.3).
Retention value	• This tree group is of low retention value.
Proposed retention	• This tree group is proposed to be removed. • Less invasive construction measures or development redesign is therefore not required.
Permits	• This tree group is not subject to known permit restrictions.

Tree 54	
Encroachment	• The footprint of the carpark and vac bays is a 24.7% encroachment into the NRZ and 1.0% into the SRZ. • This is considered a major encroachment (6.3). • The construction of the driveway has the potential to compromise the tree's long-term viability. • Recommendations within section 8.3 and 8.4 of this report are required to ensure that this tree would remain viable post construction
Retention value	• This is a neighbouring tree.
Proposed retention	• This tree is proposed to be retained.
Permits	• This tree is not subject to known permit restrictions.

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8 Recommendations

8.1 Tree retention

The following Council owned tree is proposed to be retained:

- Tree 48

The following neighbouring trees are proposed to be retained:

- Tree 49
- Tree 50
- Tree 51
- Tree 52
- Tree 53
- Tree 54
- Tree 55
- Tree 56
- Tree 57
- Tree 58
- Tree 59
- Tree 60

The following is recommended in order to ensure that trees that are proposed to be retained would remain viable post construction:

- Comply with less invasive construction measures (8.3)
- Comply with tree protection measures (8.4)

8.1.1 Permit requirements for trees that are proposed to be retained

A Clause 52.17 permit is required to remove, destroy or lop the following trees that are proposed to be retained:

- Tree 55
- Tree 57
- Tree 58
- Tree 59
- Tree 60

8.2 Tree removal

The following trees of moderate retention value are proposed to be removed:

- Tree 24
- Tree 29
- Tree 30
- Tree 37
- Tree 38

The following trees of low retention value are proposed to be removed:

- Tree 1
- Tree 2
- Tree 3
- Tree 4
- Tree 5
- Tree 6
- Tree 7
- Tree 8
- Tree 9
- Tree 10
- Tree 11
- Tree 12
- Tree 13
- Tree 14
- Tree 15
- Tree 16
- Tree 17
- Tree 18
- Tree 19
- Tree 20
- Tree 21
- Tree 22
- Tree 23
- Tree 25
- Tree 26
- Tree 27
- Tree 28
- Tree 31
- Tree 32
- Tree 33
- Tree 34
- Tree 35
- Tree 36
- Tree 39
- Tree 40
- Tree 41
- Tree 42
- Tree 43
- Tree 44
- Tree 45
- Tree 46
- Tree 47

In the event of tree removal, the following is recommended:

- Tree removal should be undertaken prior to construction commencing or during demolition.
- Written consent from the responsible authority must be obtained prior to tree removal where required.

8.2.1 Permit requirements for trees that are proposed to be removed

The following trees that are proposed to be removed are protected under Clause 52.17 and require a permit for removal:

- Tree 11
- Tree 21
- Tree 24
- Tree 37
- Tree 38

8.3 Less invasive construction measures

Less invasive construction measures or development redesign are required to ensure that trees which are proposed to be retained (8.1) would remain viable post construction.

8.3.1 Carparking (Tree 54)

Option 1

- A root investigation was undertaken along the proposed vac bays and carpark location within the NRZ of Tree 54.
- Major structural roots were encountered adjacent to Tree 54. This has implications for the vac bays and carpark where it encroaches the NRZ.
- Excavation within the NRZ should not exceed 400mm depth below existing grade, and should be supervised by a suitably qualified arborist.
- The supervising arborist should prune any roots that are encountered in accordance with section 9 of AS4373-2007 ‘Pruning of Amenity Trees’.

Option 2 (in the event excavation is required greater than 400mm in depth)

- Redesign so that the proposed carparking does not encroach into the NRZ of Tree 54 by greater than 20% and does not encroach into the SRZ, unless a root investigation (10.8) determines that the tree would remain viable post construction

8.3.2 Underground services

- All services should be located outside the NRZ/TPZ and SRZ wherever possible.
- If underground services are required to be installed within the SRZ or will result in a total combined encroachment from all proposed works (e.g. buildings, site cuts, driveway, services, etc.) that is greater than 20% into the NRZ/TPZ, a suitably qualified arborist (AQF Level 5) should be engaged to determine if installation should be carried out using non-destructive methods.
- Acceptable non-destructive methods include directional drilling greater than 0.6m in depth, hydro excavation, hand excavation, or other techniques as specified by a suitably qualified arborist (AQF Level 5).

8.4 Tree protection measures

8.4.1 Pruning

- Pruning of trees that are proposed to be retained (8.1) is not anticipated to be required. However, in the unforeseen event that pruning is required the following should be undertaken:
  - Only the minimum amount necessary for clearance in order to complete construction should be removed.
  - Pruning should be undertaken by a suitably qualified Arborist (minimum AQF level 3).
  - The pruning should be undertaken in accordance with the Australian Pruning Standard AS 4373 – 2007.
  - Pruning should be undertaken prior to machinery being brought onto site.
  - Any pruning of a neighbouring tree should be undertaken in consultation with the responsible owner.

8.4.2 Tree protection fencing

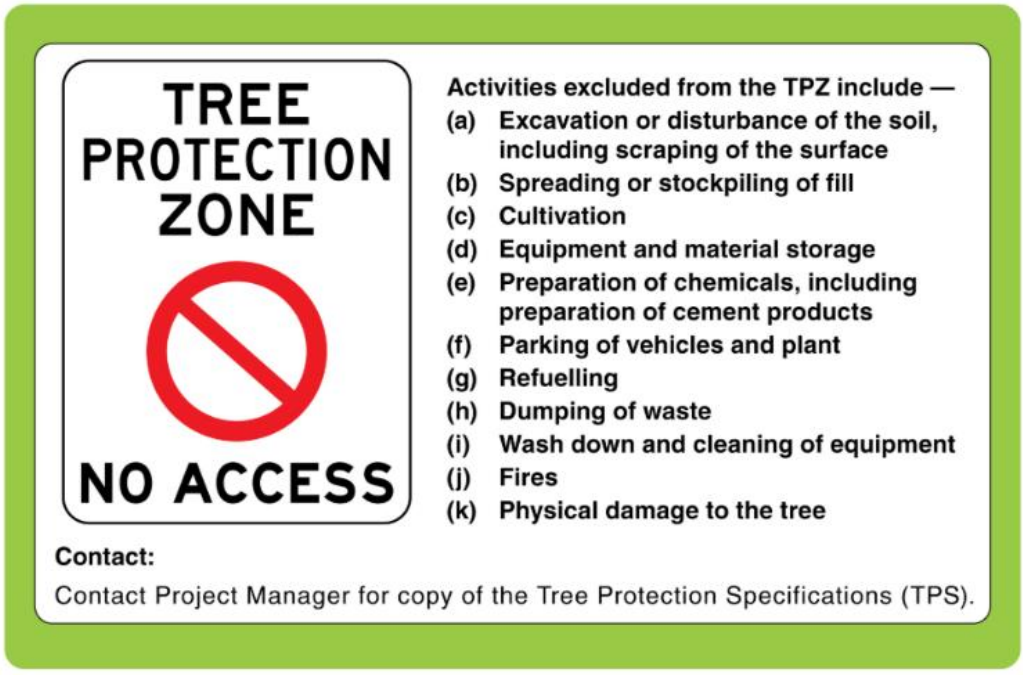
- Tree protection fencing (TPF) should be installed for Trees 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60 in locations referenced in the Tree Protection Plan.
- TPF should be installed as close to the NRZ/TPZ boundary as practically possible provided that it does not encroach onto the road, footpath, crossover or proposed works.
- TPF should be erected before any machinery or materials are brought onto the site and before the commencement of works, including demolition,

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- Once erected, protective fencing shall not be removed or altered without approval by the project arborist except in accordance with the Tree Protection Specifications (TPS).
- TPF should restrict access to the enclosed portion of the TPZ

8.4.3 Tree protection signage

- A TPZ sign provides clear and readily accessible information to indicate that a TPZ has been established.
- The sign should be minimum A3 size

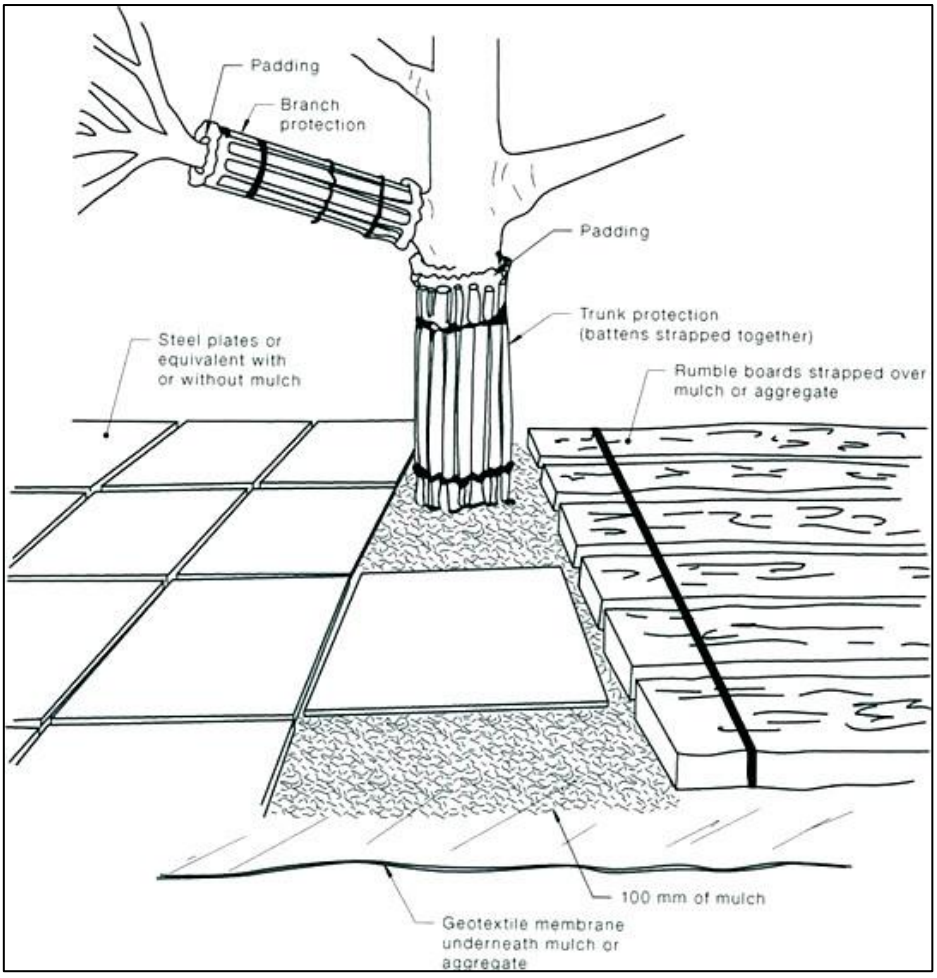


8.4.4 Site storage

- A designated storage area where building materials, chemicals etc. can be stored should be located outside the TPZ of retained trees.

8.4.5 Ground protection

- Mulch should be installed for Tree 54 in the location referenced in the Tree Protection Plan.
- Mulch should be installed where access is required within the TPZ of Tree 54 and located at least 1 metre outside of the building footprint.
- Additional recommended ground protection should be in accordance with section 4.5.3 of the AS4970-2025 “Protection of Trees on Development Sites”.



Ground protection examples

8.4.6 Prohibitions within the TPZ

The following activities are prohibited within the TPZ:

- Excavation, cultivation or disturbance of the soil, including scraping of the surface.
- Equipment and material storage.
- Preparation of chemicals, including preparation of cement products.
- Movement or parking of vehicles and plant.
- Dumping of waste.
- Spreading or stockpiling of fill.
- Refuelling.
- Washing down and cleaning of equipment or hard surfaces.
- Fires.
- Physical damage to the tree.

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9 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.

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10 Definition of terms

10.1 Terms within the tree data table

Category	Description
NRZ	The **Notional Root Zone (NRZ)** is defined in Clause 1.3.11 of AS 4970:2025 as: *"a zone enclosed by a radius of 12 times DSH that is a primary trigger for arboricultural input on a development site."* • The radius of the NRZ is calculated by multiplying the tree's diameter at standard height (DSH) by 12. • The DSH is measured at 1.4m above ground level. The minimum NRZ radius shall not be less than 2m, and the maximum shall not exceed 15m.
SRZ	The **Structural Root Zone (SRZ)** is defined in Clause 1.3.17 of AS 4970:2025 as: *"theoretical area around the base of a tree required for the tree's stability in the ground."* The SRZ radius is determined using the following formula: • SRZ radius = (D × 50)^0.42 × 0.64 • Where D = trunk diameter (in metres), measured above the root buttress flare. The SRZ only accounts for structural stability, not the full extent of the root zone needed for long-term health and viability • The SRZ calculation does not apply to palms, cycads, tree ferns and the like. • The minimum SRZ radius shall not be less than 1.5m
TPZ	The **Tree Protection Zone (TPZ)** is defined in Clause 1.3.19 of AS 4970:2025 as: *"specified zone above and below ground and at given offsets from the trunk set aside to protect a tree's roots and crown where these might be damaged by development."* • The NRZ is the starting point for determining the TPZ. • The TPZ should be determined using various considerations in relation to the tree and proposed encroachments.
DSH:	**Diameter at Standard Height (DSH)** (1.4m from ground level). The DSH measurement is what is used to calculate the Notional Root Zone (NRZ).
DAB:	The **Diameter Above Buttress** is the diameter of the trunk measured immediately above the root buttress flare. The DAB measurement is what is used to calculate the Structural Root Zone (SRZ).
CA1 / CA1.5:	**Circumference of trunk at either 1m or 1.5m from ground level**. Combined circumference is the sum of individual stem circumferences.

10.2 Tree health

Category	Description
Good:	The tree is demonstrating good or exceptional growth for the species. The tree is exhibiting a full canopy of foliage and may have only minor pest or disease problems. Foliage colour size and density is typical of a healthy specimen of that species.
Fair:	The tree is in reasonable condition and growing well for the species. The tree may exhibit an adequate canopy of foliage. There may be some dead wood in the crown, some grazing by insect or animals may be evident, and/or foliage colour, size or density may be atypical for a healthy specimen of that species.
Poor:	The tree is not growing to its full capacity. Extension growth of the laterals may be minimal. The canopy may be thinning or sparse. Large amounts of dead wood may be evident throughout the crown, as well as significant pest and disease problems. Other symptoms of stress indicating tree decline may be present.
Very poor:	The tree appears to be in a state of decline, and the canopy may be very thin and sparse. A significant volume of dead wood may be present in the canopy, or pest and disease problems may be causing a severe decline in tree health.
Dead:	The tree is no longer alive.

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10.3 Structure

Category	Description
Good:	The tree has a well-defined and balanced crown. Branch unions appear to be strong, with no defects evident in the trunks or the branches. Major limbs are well defined. The tree would be considered a good example for the species. Probability of significant failure is highly unlikely.
Fair:	The tree has some minor problems in the structure of the crown. The crown may be slightly out of balance at some branch unions or branches may be exhibiting minor structural faults. If the tree has a single trunk, this may be on a slight lean, or be exhibiting minor defects. Probability of significant failure is low.
Poor:	The tree may have a poorly structured crown, the crown may be unbalanced, or exhibit large gaps. Major limbs may not be well defined; branches may be rubbing or crossing over. Branch unions may be poor or faulty at the point of attachment. The tree may have suffered major root damage. Probability of significant failure is moderate.
Very poor:	The tree has a poorly structured crown. The crown is unbalanced or exhibits large gaps. Major limbs are not well defined. Branch unions may be poor or faulty at the point of attachment. A section of the tree has failed or is in imminent danger of failure. Active failure may be present, or failure is probably in the immediate future.
Failed:	A significant section of the tree or the whole tree has failed.

10.4 Useful life expectancy (ULE)

Category	Description
Unsafe:	The tree is considered dangerous in the location and should be addressed as a priority..
0 years:	The tree no longer provides any amenity value.
Less than 5 years:	The tree under normal circumstances and without extra stress should be safe and have value of maximum of 5 years. The tree will need to be replaced in the short term. Replacement plants should be established as soon as possible if there is efficient space, or consideration should be given to the removal of the tree to facilitate replanting.
5 to 10 years:	The tree under normal circumstances and without extra stress should be safe and have value of maximum of 10 years. Trees in this category may require regular inspections and maintenance particularly if they are large specimens. Replacement plants should be established in the short term if there is sufficient space, or consideration should be given to the removal of the tree to facilitate replanting.
10 to 20 years:	The tree under normal circumstances and without extra stress should be safe and of value of up to 20 years. During this period, regular inspections and maintenance will be required.
20 + years:	The tree under normal circumstances and without extra stress should be safe and of value of more than 20 years. During this period, regular inspections and maintenance will be required.

10.5 Tree retention value

Category	Description
High:	The tree may be significant in the landscape, offer shade and other amenities such as screening. The tree may assist with erosion control, offer a windbreak or perform a vital function in the location (e.g. habitat, shade, flowers or fruit). The tree is free from structural defects and is vigorous. Consider the retention of the tree and designing the development to accommodate the tree.
Moderate:	The tree may offer some screening in the landscape or serve a particular function in the location and have minor structural defects. The tree may be entering the mature stage of its life cycle. The tree may be retained if it does not hamper the design intent.
Low:	The tree offers very little in the way of screening or amenity and may have significant structural defects. The tree may also be mature and entering the senescent stage of its life cycle. The tree may be removed if necessary.
Neighbouring tree:	The tree is located within an adjoining private property/land. The tree is to be protected unless written consent from the tree owner(s) and/or responsible authority is obtained. Consider the retention of the tree unless written consent is obtained from the tree owner and/or responsible authority.
Council owned tree:	The tree is located within Council owned land. The tree is to be protected unless written consent from the responsible authority is obtained. Consider the retention of the tree unless written consent is obtained from the tree owner and/or responsible authority.

10.6 Age

Category	Description
Young:	Juvenile or recently planted approximately 1-7 years.
Semi Mature:	An established tree but one which has not reached its potential ultimate height and has significant growth potential. Tree is actively growing.
Mature:	Tree has reached expected size in its growing conditions.
Senescent:	Tree is over mature and has started to decline.
Dead:	The tree is no longer alive.

10.7 Amenity value

Category	Description
Very Low:	Tree makes little or no amenity value to the site or surrounding areas. In some cases, the tree might be detrimental to the area's amenity value (e.g. unsightly, risk of weed spread).
Low:	Tree makes some contribution of amenity value to the site but makes no contribution to the amenity value of surrounding areas. The removal of the tree may result in little loss of amenity. Juvenile trees, including street trees are generally included in this category. However, they may have the potential to supply increased amenity in the future.
Moderate:	The tree makes a moderate contribution to the amenity of the site and/or contributes to the amenity of the surrounding area.
High:	The tree makes a significant contribution to the amenity value of the site, or the tree makes a moderate contribution to the amenity value of the larger landscape.

10.8 Root investigation

Description
Where it is proposed that development is considered to be a major encroachment, a non-destructive root exploratory investigation may be required within the alignment of the proposed encroachment. By undertaking a non-destructive root exploratory investigation, the extent of roots within that particular area may be determined. If a negligible amount of roots are required to be removed or damaged in order to construct the proposed development, the tree may remain viable. If a significant amount of roots are proposed to be removed or damaged in order to construct the proposed development, the tree may not remain viable. Obstructions (paving, vegetation, structures) within the alignment of proposed encroachments may be required to be removed prior to the non-destructive root exploratory investigation occurring. The non-destructive root exploratory investigation report should: ○ Be undertaken by a suitably qualified Arborist (AQF Level 5 Arboriculture). ○ Detail the total distance of each excavation line. ○ Detail the closest distance from the trunk centre to the excavation line. ○ The size (diameter) and number of roots discovered and the depth of roots (where relevant). ○ Include photographs of the subject tree(s) trenches and roots. ○ Include a discussion of the findings of the root investigation and the impact of the proposed works on the long-term health/ structural stability of the tree(s).

10.9 Considerations for encroachments

Consideration	Description
Tree species	Different tree species vary significantly in their ability to tolerate root pruning. The same extent of root loss may have minimal impact on one species while causing severe decline or instability in another. As such, species tolerance is a critical factor when assessing the potential impact of a proposed encroachment. A consulting arborist must consider the biological characteristics and root sensitivity of the tree species when determining whether the tree is likely to tolerate root disturbance. Some species exhibit greater resilience to root loss due to their growth habits, rooting patterns, or adaptive capacity, while others may be highly susceptible to even minor disturbances. Therefore, species tolerance should be a key component of any encroachment assessment, especially in situations involving root pruning or excavation within the NRZ.
Tree health	A tree's health is a critical factor in its ability to tolerate root loss. Healthy trees have greater energy reserves, primarily produced through photosynthesis, which fuels vital functions such as wound compartmentalisation, root regeneration, and stress response. Trees with a full, vigorous canopy are typically more efficient at photosynthesis, enabling them to recover more effectively from pruning or disturbance. In contrast, trees in poor health or with a sparse canopy may lack the photosynthetic capacity to generate the energy needed for recovery, making them more susceptible to decline following root loss. Therefore, overall tree health and canopy condition are important considerations when assessing the potential impacts of encroachment within the NRZ.
Tree age	Young trees typically have a smaller, more concentrated, and vigorous root system, which allows them to respond more effectively to disturbance. Their high growth rates and metabolic activity mean they are generally more resilient to root pruning and can regenerate lost roots more quickly than mature trees. In addition, younger trees often have greater photosynthetic capacity relative to their size, enabling them to allocate more energy toward recovery and new growth. In contrast, mature trees usually have a much larger and more structurally complex root system that supports a greater canopy mass. The loss of structural or fine roots in older trees can significantly affect their stability and function. Furthermore, mature trees tend to have reduced growth rates and slower physiological responses, making recovery from root damage less efficient. As a result, tree age and developmental stage are important factors for a consulting arborist to consider when evaluating a tree's capacity to tolerate root disturbance associated with a proposed encroachment.
Lean of tree	The lean of a tree can provide valuable insight into the distribution of its root system. Structural roots typically develop more extensively on the side opposite the direction of the lean—known as the *tension side*—to provide mechanical support and resist gravitational forces. The tension side plays a critical role in tree stability and is expected to have a higher concentration of anchoring roots. Therefore, when assessing proposed encroachments within the NRZ (Notional Root Zone), particular attention should be given to the tension side, as disturbances in this area may have a greater impact on the tree's structural integrity.
Soil characteristics	Soil type plays a critical role in determining root architecture and has direct implications for assessing encroachments. In coarse-textured soils, such as sandy soils, tree roots typically grow deeper and develop larger diameters due to lower compaction, better aeration, and improved drainage. As a result, a greater proportion of the root system is often located at depth rather than near the surface. This deeper rooting habit means that surface-level or shallow encroachments—such as driveways, paths, or trenching less than 200 mm deep—are less likely to intersect major structural roots in sandy soils compared to clay soils. Consequently, trees growing in sandy conditions may be more likely to tolerate shallow encroachments within the NRZ or TPZ, provided deeper roots remain undisturbed. However, a site-specific assessment by a suitably qualified arborist is essential, as root depth and distribution can still vary based on other factors such as species, age, water availability, and past site disturbance.

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Consideration	Description
Existing retaining wall	Depending on the soil type, tree roots can extend to depths of approximately 600–800 mm below ground level. In well-drained soils such as sand, roots may grow deeper, while in compacted or poorly drained soils like clay, root growth is typically shallower and more lateral. Retaining walls can influence root distribution by acting as physical barriers. If a retaining wall is located near a tree, particularly within the TPZ or NRZ, it may have already restricted root development beyond its base—especially if the wall is deep or constructed with impermeable materials such as concrete. In such cases, root growth is often concentrated on the near side of the wall, and there may be significantly fewer or no structural roots extending beyond it.
Existing soil level difference	Tree roots generally grow in the path of least resistance, favouring areas with adequate oxygen, moisture, and loose, uncompacted soil. When there is a change in soil level—such as a raised or lowered area, or a sharp transition created by a retaining wall or excavation—root growth into the adjacent zone may be restricted. This is particularly true if the difference in soil level results in increased compaction, reduced aeration, or a physical barrier. For example, if a tree is growing on a higher plane, roots may be less likely to extend into a lower, excavated area due to the added resistance and potential moisture accumulation. Conversely, roots may not grow upward into a raised area if the fill is heavily compacted or lacks adequate conditions for root development. Therefore, changes in soil level can significantly influence root distribution, and should be considered when assessing potential impacts of encroachment or planning construction near trees.
Existing vegetation	Existing vegetation in close proximity to a tree can create competition for essential resources such as water, nutrients, and space within the soil profile. Dense or well-established vegetation, particularly other trees or large shrubs, may create a zone of intense competition that can deter root growth from neighbouring trees into that area. As a result, a tree's root system may be less developed in areas where strong competition exists, especially if the surrounding vegetation has already established dominance over the available soil resources. This can influence root distribution patterns and should be considered when assessing the likely presence or absence of roots in a particular area.
Hard encroachment	A hard encroachment involves works that typically require deep excavation or substantial soil modification such as strip footings, site cuts and retaining walls greater than 200mm in depth, basements etc.
Soft encroachment	A soft encroachment refers to less invasive works that have a lesser impact on tree roots and soil conditions. Such as driveways, paving, fill, site cuts or retaining walls less than 200mm in depth etc.
Hard and soft encroachment comparison	Trees are generally able to tolerate a higher percentage of soft encroachment compared to hard encroachments due to the reduced likelihood of root damage and soil disruption. When determining if a tree is expected to tolerate a moderate or major encroachment, a suitably qualified arborist (AQF Level 5) will not only consider the encroachment percentage, but also consider if type of encroachment (i.e. hard or soft) and its potential to impact a trees root system.
Compensatory area	In the event of an encroachment into the NRZ, a compensatory area may be considered within the TPZ. If a suitable portion of the TPZ remains available for root growth and is accessible to the tree, it can help offset the encroachment and increase the likelihood of the tree's ongoing health and structural stability.

City of Greater Geelong, Statutory Planning - Date Received 28/7/2026

11 Appendix

11.1 Clause 52.17 exemptions

The requirement to obtain a permit does not apply to:	
Conservation work	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to enable the carrying out of conservation work: • which provides an overall improvement for biodiversity; and • with written agreement of the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*).
Crown land	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to manage Crown land: • by or on behalf of the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*), or Parks Victoria, and in accordance with the *Procedure for the removal, destruction or lopping of native vegetation on Crown land*; or • with written permission from the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*).
Dead native vegetation	Dead native vegetation Native vegetation that is dead. This exemption does not apply to a standing dead tree with a trunk diameter of 40 centimetres or more at a height of 1.3 metres above ground level.
Emergency works	Native vegetation that is to be removed, destroyed, or lopped: • in an emergency by, or on behalf of, a public authority or municipal council to create an emergency access associated with emergency works; or • where it presents an immediate risk of personal injury or damage to property. Only that part of the vegetation that presents the immediate risk may be removed, destroyed or lopped under this exemption.
Existing buildings	Native vegetation that is to be removed, destroyed, or lopped to the minimum extent necessary to enable the use or maintenance of a building constructed in accordance with a planning or building permit issued before 15 September 2008. This exemption does not apply to: • the operation or maintenance of a fence; or

The requirement to obtain a permit does not apply to:	
	• native vegetation located more than 10 metres measured from the outermost point of the building.
Existing buildings and works in the Farming Zone and Rural Activity Zone	Native vegetation that is to be removed, destroyed, or lopped to the minimum extent necessary to enable the use or maintenance of an existing building or works used for Agricultural production, including a dam, utility service, bore, horticultural trellising and accessway in the Farming Zone or the Rural Activity Zone. This exemption does not apply to: • the use or maintenance of a Dwelling; or • the operation or maintenance of a fence; or • native vegetation located more than 10 metres measured from the outermost point of the building or works.
Fences	Native vegetation that is to be removed, destroyed, or lopped to the minimum extent necessary to enable: • the operation or maintenance of an existing fence; or • the construction of a boundary fence between properties in different ownership. The clearing along both sides of the fence when combined must not exceed 4 metres in width, except where land has already been cleared 4 metres or more along one side of the fence, then up to 1 metre can be cleared along the other side of the fence.

Fire protection	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to carry out any of the following fire protection activities:
	• fire fighting;
	• planned burning;
	• making or maintenance of a fuelbreak or firefighting access track (or any combination thereof) that does not exceed a combined width of 6 metres;
	• making a strategic fuelbreak up to 40 metres wide by, or on behalf of, a public authority in accordance with a strategic fuelbreak plan approved by the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*);
	• in accordance with a fire prevention notice issued under either:
	  ○ Section 65 of the Forests Act 1958; or
	  ○ Section 41 of the Country Fire Authority Act 1958.
	• keeping native vegetation clear of, or minimising the risk of bushfire ignition from, an electric line in accordance with a code of practice prepared under Part 8 of the *Electricity Safety Act 1998*;

The requirement to obtain a permit does not apply to:	
	• minimising the risk to life and property from bushfire on a roadside of a public road managed by the relevant responsible road authority, and carried out by or on behalf of that authority, in accordance with the written agreement of the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*). In this exemption, roadside, public road and responsible road authority have the same meanings as in section 3 of the *Road Management Act 2004*. *Note: Additional permit exemptions for bushfire protection are provided at Clause52.12.*
Geothermal energy exploration and extraction	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary in accordance with an operation plan approved under the *Geothermal Energy Resources Act 2005.*
Grasses	Native grass that is to be mowed or slashed for maintenance only, provided that the grass is: • located within a lawn, garden or other landscaped area; or • maintained at a height of at least 10 centimetres above ground level.
Grazing	Native vegetation that is to be removed, destroyed or lopped by domestic stock grazing on: • freehold land; or • Crown land in accordance with a license, permit or lease granted under applicable legislation.
Greenhouse gas sequestration and exploration	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary in accordance with an operation plan approved under the *Greenhouse Gas Geological Sequestration Act 2008.*
Harvesting for timber production – naturally established native vegetation	Naturally established native vegetation that is to be removed, destroyed or lopped to enable timber harvesting operations and associated activities that are in accordance with the *Code of Practice for Timber Production 2014* and are: • undertaken on public land under a licence or permit issued under section 52 of the *Forests Act 1958*; or • authorised in accordance with Part 5 of the *Sustainable Forests (Timber) Act 2004*.
Land management or directions notice	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to comply with a land management notice or directions notice served under the *Catchment and Land Protection Act 1994*.

The requirement to obtain a permit does not apply to:	
Land use conditions	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to comply with a land use condition served under the *Catchment and Land Protection Act 1994*.
Lopping and pruning for maintenance	Lopping or pruning native vegetation, for maintenance only, provided no more than 1/3 of the foliage of each individual plant is lopped or pruned. This exemption does not apply to: • the pruning or lopping of the trunk of a native tree; or • native vegetation on a roadside or railway reservation
Mineral exploration and extraction	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary by the holder of an exploration, mining, prospecting, or retention license issued under the *Mineral Resources (Sustainable Development) Act 1990*: • that is low impact exploration within the meaning of Schedule 4A of the *Mineral Resources (Sustainable Development) Act 1990*; or • in accordance with a work plan approved under Part 3 of the *Mineral Resources (Sustainable Development) Act 1990*. *Note: Schedule 4A of the Mineral Resources (Sustainable Development) Act 1990 specifies limits on the extent of native vegetation that may be removed as part of low impact exploration.*
New buildings and works in the Farming Zone and Rural Activity Zone	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to enable the construction of a building or works used for Agricultural production, including a dam, utility service, bore and accessway, in the Farming Zone or the Rural Activity Zone. The maximum extent of native vegetation that may be removed, destroyed or lopped under this exemption on contiguous land in the same ownership in a five year period must not exceed any of the following: • 1 hectare of native vegetation which does not include a tree. • 15 native trees with a trunk diameter of less than 40 centimetres at a height of 1.3 metres above ground level. • 5 native trees with a trunk diameter of 40 centimetres or more at a height of 1.3 metres above ground level. This exemption does not apply to the construction or operation of a pivot irrigation system or horticultural trellising.
New dwellings in the Farming Zone and Rural Activity Zone	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to enable the construction of a dwelling in the Farming Zone or Rural Activity Zone. The maximum extent of native vegetation removed, destroyed or lopped under this exemption on contiguous land in the same ownership in a five year period must not exceed any of the following:

The requirement to obtain a permit does not apply to:	
	• 300 square metres of native vegetation which does not include a tree. • 5 native trees with a trunk diameter of less than 40 centimetres at a height of 1.3 metres above ground level. • 1 native tree with a trunk diameter of 40 centimetres or more at a height of 1.3 metres above ground level. This exemption does not apply native vegetation removed, destroyed or lopped to enable the construction of a swimming pool, tennis court or horse ménage.
Personal use	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to obtain reasonable amounts of wood for personal use by the owner or lawful occupier of the land. For the purpose of this exemption personal use means uses such as heating and cooking, building and fence construction on land, and hobbies such as arts and craft. This exemption does not apply to: • contiguous land in one ownership that has an area of less than 10 hectares; • the removal, destruction or lopping of native vegetation by means other than cutting or chopping; or • a standing native tree (including a dead tree) with a trunk diameter of 40 centimetres or more at a height of 1.3 metres above ground level.

Pest animal burrows	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to enable the removal of pest animal burrows in the Farming Zone or the Rural Activity Zone:
	• in accordance with written agreement of an officer of the department responsible for administering the *Flora and Fauna Guarantee Act 1988*; or
	• provided the maximum extent of native vegetation removed, destroyed or lopped on contiguous land in the same ownership in a five-year period does not exceed any of the following:
	  ○ 1 hectare of native vegetation which does not include a tree; or
	  ○ 15 native trees with a trunk diameter of less than 20 centimetres at a height of 1.3 metres above ground level.

Planted vegetation	Native vegetation that is to be removed, destroyed or lopped that was either planted or grown as a result of direct seeding. This exemption does not apply to native vegetation planted or managed with public funding for the purpose of land protection or enhancing biodiversity unless the removal, destruction or lopping of

The requirement to obtain a permit does not apply to:	
	the native vegetation is in accordance with written permission of the agency (or its successor) that provided the funding.
Railways	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to maintain the safe and efficient function of an existing railway, or railway access road, in accordance with the written agreement of the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*).

Regrowth	Native vegetation that is to be removed, destroyed or lopped that has naturally established or regenerated on land lawfully cleared of naturally established native vegetation, and is:
	• less than 10 years old; or
	• bracken (*Pteridium esculentum*); or
	• within the boundary of a timber production plantation, as indicated on a Plantation Development Notice or other documented record, and has established after the plantation; or
	• less than ten years old at the time of a property vegetation plan being signed by the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*), and is:
	  ○ shown on that plan as being 'certified regrowth'; and
	  ○ on land that is to be used or maintained for cultivation or pasture during the term of that plan.
	This exemption does not apply to land where native vegetation has been destroyed or otherwise damaged as a result of flood, fire or other natural disaster.

Road safety	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary by and on behalf of a public authority or municipal council to maintain the safe and efficient function of an existing road in accordance with the written agreement of the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*).
Site area	Native vegetation that is to be removed, destroyed or lopped on land, together with all contiguous land in one ownership, which has an area of less than 0.4 hectares. This exemption does not apply to native vegetation on a roadside or rail reservation.
Stock movements on roads	Native vegetation that is to be removed, or destroyed by stock being moved along a road.

The requirement to obtain a permit does not apply to:	
	This exemption does not apply to grazing as a result of holding stock in a temporary fence (including an electric fence) on a roadside for the purpose of feeding.
Stone exploration	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to enable the carrying out of Stone exploration. The maximum extent of native vegetation that may be removed, destroyed or lopped under this exemption on contiguous land in the same ownership in a five year period must not exceed any of the following: • 1 hectare of native vegetation which does not include a tree. • 15 native trees with a trunk diameter of less than 40 centimetres at a height of 1.3 metres above ground level. • 5 native trees with a trunk diameter of 40 centimetres or more at a height of 1.3 metres above ground level. This exemption does not apply to costeaning and bulk sampling activities.
Stone extraction	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to enable the carrying out of Stone extraction in accordance with a work plan approved under the *Mineral Resources (Sustainable Development) Act 1990* and authorised by a work authority under that Act.
Surveying	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary by, or on behalf of, a licenced surveyor (within the meaning of section 3 of the *Surveying Act 2004*) using hand-held tools to establish a sightline for the measurement of land.
Traditional owners	Native vegetation that is to be removed, destroyed or lopped by a person acting under, and in accordance with: • a natural resource agreement under Part 6 of the *Traditional Owner Settlement Act 2010*; or • an authorisation order made under sections 82 or 84 of the Traditional Owner Settlement Act 2010 as those sections were in force immediately before the commencement of section 24 of the *Traditional Owner Settlement Amendment Act* in 2016 (1 May 2017).
Utility installations	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary: • to maintain the safe and efficient function a Minor utility installation; or • by or on behalf of a utility service provider to maintain or construct a utility installation in accordance with the written agreement of the Secretary to the Department of Environment, Land, Water and Planning (as constituted

The requirement to obtain a permit does not apply to:	
	under Part 2 of the *Conservation, Forests and Lands Act 1987*).
Vehicle access from public roads	Native vegetation that is to be removed, destroyed, or lopped to the minimum extent necessary to enable the construction or maintenance of a vehicle access across a road reserve from a property boundary to a public road. This exemption only applies to properties which share a common boundary with the road reserve, and the total width of clearing must not exceed 6 metres. This exemption does not apply where there is a practical opportunity to site the accessway to avoid the removal, destruction or lopping of native vegetation. In this exemption, roadside and public road have the same meanings as in section 3 of the Road Management Act 2004. *Note: Under the Road Management Act 2004 the written consent of the coordinating road authority is required to conduct any works, including removing a tree or other vegetation, in, on, under or over a road.*
Weeds	Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary to enable the removal or destruction of a weed listed in the schedule to Clause 52.17. The maximum extent of native vegetation that may be removed, destroyed or lopped under this exemption on contiguous land in the same ownership in a five year period must not exceed any of the following: • 1 hectare of native vegetation which does not include a tree. • 15 native trees with a trunk diameter of less than 20 centimetres at a height of 1.3 metres above ground level.