

19 March 2024

Hi Mel, Michael, et al,

Following the discussions at the recent AGM, I have had a look over the latest plans for the upgrades to Thomas Stephens Reserve. Despite someone at the AGM mentioning that they thought the casuarinas were to be retained, I was disappointed to see that the proposal includes the removal of 6 of the 7 existing canopy trees (aka 85%), including all of the Casuarinas being removed along with a Spotted Gum. Whilst the arborist report does not include an assessment of SULE (Safe Useful Life Expectancy) of the existing trees in their report (*which as a private practicing architect would be an expectation of any arborist report obtained to submit to the council for assessment*), five of the six trees proposed to be removed are noted as having "good" health, "good" vigour, "high" retention value, "high" significance value, "good" structure and "good" form, with the remaining one tree (Willow gum) being ranked "fair to good".

The assessment of these trees makes a significant case for their retention, however the design of the reserve seems to have driven the recommendation for their removal, rather than their significance being a driver of the design of the reserve upgrades. If this were a private application being made to the council, I would expect they would not support the proposal to remove so many native canopy trees that have such a high retention value. I have no objections over the proposed design of the reserve upgrades and I think it is a very high quality design and likely compatible with the retention of at least more of the existing trees, if not all of them. The issue I have is with the council's (or the council's arborist) presentation of the facts and the reasoning to justify the removal of these trees. **In my opinion the offset of canopy tree removal with replacement planting is not sufficient to justify the removal of these trees.** If you go on council's own website under "Native Planting Guide for Pittwater Ward", you will find both Casuarina Glauca and Corymbia Maculata are on that list, however from the arborists "Potential replacement tree species list" you will only find one of the seven recommended species in the Pittwater planting guide. Even if replacement planting is with "semi-advanced" specimens, all of the "recommended species" are significantly smaller species in comparison to what is being removed, so the canopy will never be replaced, and any canopy that does establish will be a significant time away. The reserve will be a much hotter space in Summer with limited shade presently enjoyed whilst sitting along the waterfront taking in the view of the Pittwater whilst the wind whispers through the canopy above. **The most appropriate approach to the upgrades to Thomas Stephens Reserve would be to undertake the works in a way that incorporates, protects and preserves the existing mature native canopy trees that exist in the reserve as would be conditioned by the Council by any individual who would undertake a similar proposal.**

The Corymbia Maculata (spotted gum) is at a semi-mature growth stage allowing for significant ongoing growth and is a characteristic tree species of the Pittwater Spotted Gum Forest endangered ecological community. The Scientific Committee, established by the Threatened Species Conservation Act found that "*Pittwater Spotted Gum Forest has been extensively cleared from the Barrenjoey Peninsula and the western and southern shores of Pittwater, and is threatened by further clearing for housing and related infrastructure*". And yet the significance of this species seems to have been given no consideration whatsoever in the arborist report, it is simply supported for removal, because works are proposed within the tree protection zone of the tree.

This highlights what seems to be the approach applied to the removal of the trees, it has nothing to do with the actual viability of retaining trees. What I mean by this is that Australian Standard AS4970 (Protection of trees on development sites) determines

the required tree protection zones (TPZ) for trees that are located within proximity of development works. A TPZ is defined as *"the principal means of protecting trees on development sites... It is an area isolated from construction disturbance so that the tree remains viable."* Because the proposed upgrades cover the entire area of the reserve it is inevitable that the areas of works would overlap with the TPZ of all of the trees, so rather than implementing measures that acknowledge potential impacts to the trees, they are simply given a blanket support for removal by the arborist report which undermines the objective of this policy in the first place which is to protect trees. More importantly, this conclusion distorts the reality that the works that are proposed within the tree protection zones could be designed and constructed in a way that minimises the likelihood of detrimental impacts on the health of these trees. It is quite common for arborist reports to make recommendations such as *"...any works taking place within the TPZ shall be undertaken with supervision by the project arborist..."* or *"...any excavation undertaken within the TPZ shall be hand excavation and any roots greater than 40mm shall not be severed without prior approval by the project arborist..."* all of which could make it possible to undertake the reserve upgrades without necessitating the removal of these trees. It is important to note that appendix 8 of the AS4970 allows that *"This report applies the Tree Protection Zone - Standard Procedure However, this does not restrict the author from applying additional or alternative conditions where it is deemed appropriate by the author for the Protection of trees on development sites"* so whilst a TPZ is typically an area isolated from the construction disturbance, it is possible, and is common practice to acknowledge that works will take place within the TPZ in which case the arborist would then specify tree sensitive construction methodologies to be implemented when works are conducted within those areas to minimise the risk of affecting the health of the subject trees.

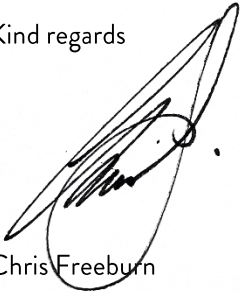
The four casuarinas (She-oaks) are recommended for removal on the farcical justification that *"TREE #3, TREE #4, TREE #5 and TREE #6 are described as the most impacted upon (below ground level) on the basis their 'live root' systems will be damaged when rebuilding the existing sandstone seawall. On this basis, we support replacing TREE #1, TREE #2, TREE #3, TREE #4, TREE #5, and TREE #6"*. This statement is incongruent with the facts because the TPZ of TREE#3 and TREE#4 are outside the area of proposed seawall works. Whilst TREE#5 and TREE#6 are adjacent to the seawall, there is no acknowledgement of the fact that the root systems of these trees are already adjacent to an existing seawall and the root systems would have adapted accordingly. The report also does not seem to acknowledge that the new seawall is simply replacing an existing seawall so it is entirely possible that there may be no impact at all. Finally, the report makes little reference to the specifics of the species; Casuarina Glauca is known to be an incredibly resilient species, highly suited to saline conditions and providing excellent canopy cover and having a strong association with black cockatoos as it provides the seeds that are their sole source of food. Last year I had problems with a Casuarina Glauca having grown far too large and was fouling our rainwater collection system, but I did not want to cut the tree down. I consulted several arborists, and they all told me about the hardiness and resilience of Casuarina and said it would likely survive being topped, which it did. After getting approval from NBC to remove the tree (*there is no such thing as a permit for heavy pruning*) I cut the tree from around 15m tall down to about 4m tall, it sat dormant for about six months and has since started shooting new branches. In my research I read about farmers trying to remove casuarinas from riverbanks but no matter how many times they cut them, the stumps just continue to shoot over and over. If ever there was a species that could tolerate extensive works, surely Casuarina is it.

I believe our community is to be robbed of a beautiful and established canopy providing shade and biodiversity. The proposed upgrade works do not need any major change to their design, they only need a change in methodology to implement tree sensitive construction methodology when working within the TPZ of the trees. The proposed decking is an excellent design move

to allow for improved water infiltration rather than the existing hard surfaces, if the trees need a wider berth, bench seats could wrap around the trunks, leaving a garden bed around the base of the tree's trunks. The spotted gum is even located in what is proposed as a garden bed! What a ludicrous proposal that a tree needs to be cut down to make way for a garden bed so a tree can be planted!

I am eager to hear the committee's thoughts on the points I have made above. As an individual I can voice my concerns to the council, but I suppose I am tainted by my experience of watching Council continue to do whatever it was they wanted/planned to do regardless of the faults in their plans being brought to light, I personally think this is a matter that needs and warrants lots of noise and jumping up and down. It serves as a good platform to communicate that replacement planting (*regardless of species*) is no substitute for the preservation of established canopy trees.

Kind regards



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