



11 February 2022

Our Ref: 2022/054180
File No: R/2017/25/I
Your Ref: SSD-8925-MOD-6

Rodger Roppolo
Senior Planning Officer – Key Sites Assessments
Department of Planning, Industry and Environment

via Planning Portal

Dear Rodger

The New Sydney Fish Market – SSD 8925 MOD 6 – Temporary construction site accommodation – Advice on Response to Submissions

Thank you for your correspondence dated 1 February 2022 inviting the City of Sydney Council (“the City”) to provide comments on the Response to Submissions (RtS) for the proposed modification for temporary construction site accommodation associated with the new Sydney Fish Markets development.

City officers have reviewed the proposed modification and note the proposal has been amended to reduce the proposed tree removal from three trees to one (tree T8 proposed for removal to connect sewerage to the proposed temporary structure) and has been accompanied by an amended Arboricultural Impact Assessment Report which now includes pruning specification and root investigations. It is also noted that to facilitate the site accommodation works, 13 trees within the SSC car park will still be impacted by the proposal to extend the work site boundary.

The City provides the following comments for your consideration:

- Section 4 of the amended Arboricultural Impact Assessment Report (AIA) prepared by Tree Report dated January 2022 ‘Version 2’ states that a minor Tree Protection Zone (TPZ) encroachment is up to 20%. This statement is not in accordance with Australian Standards AS 4970-2009 ‘*Protection of trees on development sites*’. A TPZ encroachment greater than 10% of the TPZ is classified a major encroachment.
- The proposed pruning to T3 and T10 is supported, however, the proposed pruning to T4 of four branches consisting of three 150mm and one 100mm diameter branches will significantly change the tree’s form. The Arboricultural Comment Letter prepared by Tree Report dated 25 January 2022 states that 15% canopy will be removed from T4. From reviewing the pruning specification, it would appear that the removal of the four branches would be greater than 15% canopy.
- Exploratory non-destructive root investigations have been undertaken adjacent T3, T9, T10. Excavation was undertaken by hand to a 600m diameter. The depth varies at each tree depending on roots being present. Three roots from T3 and

tree roots from T9 were found. The largest roots were 50mm diameter. The proposed roots pruning is considered minor and unlikely greatly affect the health and stability of T3 and T9.

Overall, the City is generally supportive of the amendments to retain and prune trees T3 and T10, however, the proposed removal of tree T8 and extensive pruning to tree T4 to facilitate temporary works is still concerning. The following recommendations are made:

- To retain tree T8, the proposed sewer connection should be relocated outside the Tree Protection Zone (TPZ) of all existing trees. Alternative installation methods for services, such as directional boring/drilling, or redirection of services shall be employed where large woody roots greater than 30mm diameter are encountered during the installation of any services adjacent to the specified TPZ.
- Pruning to T3 and T10 as per the AIA recommendations must be undertaken in accordance with *Australian Standard 4373–2007, Pruning of Amenity Trees*.
- The design of temporary structures should be amended to be slightly setback from the trees canopy to reduce the level of pruning specified to tree T4.
- All plans are to be updated to show the TPZ, SRZ and existing canopy spread of exiting street trees.
- Reference should be made to the City's '*Tree Guidelines for Pruning, Reporting and Using an Arborist*' for guidance on information that must be provided in an Arboricultural Impact Assessment Report, including tree pruning specification and exploratory root investigation. More information can be found at <https://www.cityofsydney.nsw.gov.au/property-tree-maintenance/apply-prune-remove-tree>

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Senior Planner, on 9265 9333 or at mburge@cityofsydney.nsw.gov.au

Yours sincerely,



Andrew Rees
Area Planning Manager, Major Projects
City Planning | Development | Transport