

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

7 August 2025

Attn: Keith Ng

Keith.Ng@planning.nsw.gov.au

Ref: SSD Modifications (SSD-73228210-Mod-1)

Proposal: MOD 1 - Tree removal, HPC payment staging and Construction Staging

Property: 129-153 Parramatta Road and 53-75 Queens Road, Five Dock

Dear Mr Ng,

Thank you for the opportunity to comment on the proposed modification to the approved mixed-use development incorporating in-fill affordable housing at the above address.

The modification includes, among other elements, the proposed removal of a significant number of mature trees located within the grounds of Rosebank College, a locally listed heritage item under the Canada Bay Local Environmental Plan 2013. Following a review of the modification application and supporting documentation, Council does not support the proposed tree removals at Rosebank College due to the identified arboricultural, environmental, and heritage concerns, which have not been adequately addressed by the applicant.

Please find below Council's comments for your consideration in the assessment of this application:

The Arboricultural Impact Assessment and associated documentation do not sufficiently demonstrate that tree removal is the only viable option. In several instances, the reasons for removal relate to demolition of adjacent buildings or walls, not new construction. Council's Tree Services Coordinator considers that alternative design and construction methods could facilitate tree retention without significantly altering the proposed development footprint.

Critical details such as root mapping and assessment of structural dependency of trees on adjacent retaining walls are missing. For example, no evidence has been provided to confirm that Tree T44.9 relies structurally on the retaining wall proposed for demolition, nor has retention of part of the wall been properly explored.

The proposal does not comply with the relevant provisions of the Canada Bay Development Control Plan (DCP) relating to tree preservation, nor with the aims of Chapter 2 of the State Environmental Planning Policy (Biodiversity and Conservation) 2021. In particular, the removal is inconsistent with objectives to:

- Safeguard the longevity of protected trees;
- Enhance biodiversity and canopy cover;
- Preserve visual and environmental amenity in non-rural areas.

While not individually listed, the mature *Eucalyptus microcorys* (Tallowwood) trees contribute to the setting and historical character of Rosebank College, as confirmed by Council's Heritage Coordinator.

The trees represent the site's historic landscaping and contribute to the green setting of the buildings. No heritage impact statement has been provided with the modification application to address these issues.

While a significant number of replacement plantings are proposed, including rooftop plantings, these will not provide the same ecological, aesthetic or heritage value in the short to medium term. Mature trees provide critical urban canopy and habitat that cannot be immediately replaced.

For the above reasons, Council objects to the proposed tree removals as part of the current modification application on both arboricultural and heritage grounds. It is recommended that the Department require the applicant to:

- Reconsider the development layout to retain the existing trees;
- Undertake further arboricultural and engineering assessments, including root mapping and structural analysis;
- Submit a heritage impact statement addressing the contribution of the trees to the significance of Rosebank College;
- Investigate options for staged or partial demolition and construction methodologies that allow tree retention.

Should you require further clarification or wish to discuss these comments, please do not hesitate to contact me on 91210278 or email nima.salek@canadabay.nsw.gov.au.

Yours faithfully,



Nima Salek
Senior Statutory Planner
City of Canada Bay