

25.2.2026

2A Gregory Place Pty Ltd

Dear Raymond,



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RE: RESPONSE TO DEVELOPMENT APPLICATION, SSD-31179510

To Whom it may concern

Horticultural Management Services prepared the updated Arboricultural Impact Assessment, Tree Protection and Management Plan on behalf of 2A Gregory Place Pty Ltd to accompany the submitted Assessment Report for the proposed Affordable Housing and Build to Rent State Significant Development Application, SSD-31179510.

We understand from *2A Gregory Place Pty Ltd* that the Department of Planning, Housing and Infrastructure determined that the amendment did not warrant re-exhibition, however sought feedback from a number of agencies and the City of Parramatta Council.

We have been provided with Council's submission and have been requested to respond to the following comments.

COUNCIL COMMENT	HMS RESPONSE
5. Landscape and Trees	
<i>Trees</i>	
<i>The Arboricultural Impact Assessment, Tree Protection and Management Plan (Horticultural Management Services. 16 July 2025) has several inaccuracies which should be addressed.</i>	See individual responses below.
Recommendation: <i>That the applicant address the following matters relating to tree protection:</i>	
<i>- The report indicates removal of trees/vegetation within the adjoining Hambledon Cottage site which is not supported. Documentation is required to be updated to reflect the retention of trees and vegetation located within the adjoining site and trees with shared ownership.</i>	This has been corrected and a revised Arboricultural Impact Assessment, Tree Protection and Management Plan has been provided.
<i>- The report should considered (sic) works proposed within the parcel of land located on the southern side of the channel.</i>	The report considers the works as proposed within the application. We note that this application is a concept application, and that a subsequent development application for detailed design will be prepared which will be accompanied by a further updated and detailed Arboricultural Impact Assessment, Tree Protection and Management Plan.

- An accurate and to scale series of tree protection plans is required to be provided to enable detailed assessment.	The report incorporates tree protection plans to the relevant scale. We note that this application is a concept application, and that a subsequent development application for detailed design will be prepared, and a further updated and detailed Arboricultural Impact Assessment, Tree Protection and Management Plan will be prepared.
- The report should be updated to reflect the current Australian Standard for Protection of Trees on development sites AS4970-2025	We note that whilst AS4970-2009 has been superseded by AS4970-2025, this project's design has been undertaken, and our advice prepared for the wider consultant team for this concept application has been done in accordance with AS4970-2009. Furthermore, the further detailed design application will be accompanied by a further updated and detailed Arboricultural Impact Assessment, Tree Protection and Management Plan. Notwithstanding, we make the following comments to satisfy the consent authority that the assessment and conclusions made in the current report are valid, applicable and appropriate for this application. AS4970-2025 (the updated Standard), makes the following (not exhaustive) changes: • A new term 'Nominal Root Zone (NRZ)' has been introduced. The NRZ partially replaces the former terms 'Tree Protection Zone' or 'TPZ', as regards roots and soils, reflecting the focus on root protection measures. • Root investigations guidance is strengthened. • Soil and root zone management now includes detailed recommendations. • The former TPZ encroachment guidance allowed for minor encroachments of up to 10% with minimal justification. In the Updated standard, encroachment is now provided for up to 20%, noted as moderate encroachments, with provisions for 20-30% (major encroachments) using root mapping and tree sensitive designs. • Changes to the monitoring and compliance of tree protection measures, including reporting intervals during construction. Based on the above, it is our opinion, and as concluded in the current revised Arboricultural Impact Assessment, Tree Protection and Management Plan, that the concept application satisfies the requirements of AS4970-2009, and therefore will satisfy the requirements of AS4970-2025.

<i>Council raised concerns in its previous submission in relation to inadequate setback given to significant trees T181, 190, 191 and 192 located within the northwestern corner of the site. The design has been revised to provided adequate setback to the proposed buildings.</i> <i>The area surrounding the trees has since been replaced with a cul-de-sac road configuration which appears sufficiently setback subject to confirmation at final design stage.</i>	Noted.
Recommendation: <i>It is recommended that DPHI draft a condition on any consent requiring that any future application(s) must submit a revised Arborist Report which specifies tree protection measures and setbacks to retain and protect trees across the site, including the abovementioned.</i>	Noted.

Should you require further clarification with regards to this letter please contact me on 0425 308 275.

Regards Scott



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