



TREESENSE
CONSULTING

Arboricultural Impact Assessment

Client: Place Project Management

Attention: Mr. Lewis Coulls
Prepared By: Christopher Pate – Principal Consultant

Date: 31/10/2025

Site Assessed: 7 Spence Avenue, Myrtle Bank, South Australia 5064

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Executive Summary

Treesense Consulting have been engaged by Southern Cross Care to provide an arboricultural impact assessment for the proposed development of the allotment 7 Spence Avenue, Myrtle Bank, South Australia 5064.

The purpose of this report is to identify the potential impacts which the proposed development will have on the trees and provide impact mitigation requirements in accordance with Australian Standard AS4970-2025: *Protection of trees on development sites*.

Seven trees which are located on the site or are within its proximity are required to be retained. No form of tree-damaging activity is to occur to these trees regarding the proposed development. Tree protection measures in accordance with Australian Standard AS4970-2025 *Protection of Trees on Development Sites* are to be followed throughout all phases of this project. These seven trees are classed as regulated or significant as defined within the *Planning, Development and Infrastructure Act – 2016*, the undertaking of development activities within their proximity is subject to a successful development application to the relevant authority.

Thirteen trees which are located on the site are required to be removed prior to the commencement of works. The proposed design conflicts with these trees and their removal is necessary for it to proceed. These thirteen trees are classed as regulated or significant as defined within the *Planning, Development and Infrastructure Act – 2016* and their removal is subject to a successful development application to the relevant authority.

Details supporting these requirements can be found within the body of this report.

If you have any questions regarding this report, please do not hesitate to contact me.

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Contents

Executive Summary.....	2
Contents.....	3
Brief.....	4
Supporting Documents	5
Methodology.....	6
Arboricultural Impact Assessment Findings	9
Arboricultural Impact Assessment Discussion.....	11
Requirements.....	14
References	16
Glossary of Terms	17
Appendices.....	18
Appendix 1: Complete Tree Data.....	19
Appendix 2: Site Encroachment Diagram	20
Appendix 3: Indicative Tree Location Plan.....	21
Appendix 4: Relevant Legislation.....	22
Appendix 5: Planning and Design Code Performance Outcomes – Regulated and Significant Trees to be Removed	24
Appendix 6: Tree Protection Zones General Guidelines.....	28
Appendix 7: Tree Protection Zone - Sign Example	34
Appendix 8: Tree Protection Plan	35



Brief

Treesense Consulting have been engaged by Southern Cross Care to provide an arboricultural impact assessment for the proposed development of the allotment 7 Spence Avenue, Myrtle Bank, South Australia 5064.

The proposed design is to entirely renovate the allotment of approximately 1.4 hectares. The existing Archbishops Residence Building is to be retained and two new retirement living facilities are to be constructed. Driveways, car parks, ornamental lawns and numerous tree plantings have been proposed.

The following information will be provided, in accordance with AS4970-2025 (Section 2.2):

- The legislative status of each tree assessed as defined within the *Planning, Development, and Infrastructure Act – 2016*.
- Notional Root Zones (NRZ) and Structural Root Zones (SRZ) for each tree assessed, and calculated encroachments into these zones by the proposed development.
- Annotated design plans detailing the NRZ's, SRZ's and the respective proposed encroachments.
- Impact mitigation requirements pre-development in accordance with AS4970-2025.



Supporting Documents

The following documents have been used in the preparation of this report:

- Pate, C. (2025). *Preliminary Arboricultural Assessment: 7 Spence Avenue, Myrtle Bank, South Australia 5064*. Treesense Consulting.
- Walter Brooke. (16/07/25). *Site Plan - Overall*. Project No. 23-0628, Drawing No. SK02, Revision F.
- Oxigen. (18/09/25). *Tree Removal Plan*. Project No. 25.028, Drawing No. 100, Revision A.
- TPZ encroachment diagram for proposed construction at 7 Spence Avenue, Myrtle Bank, South Australia 5064 – Computer Aided Design (CAD) requirements completed, with thanks, by Mr. Lewis Poore.



Methodology

An Arboricultural Impact Assessment has been completed in accordance with Australian Standard AS4970 – 2025: *Protection of trees on development sites*, using the corresponding Preliminary Arboricultural Assessment and the design drawings provided by the client for the proposed development. Included in this section is a description of the methods used to carry out the Arboricultural Impact Assessment.

Notional Root Zones

Notional Roots Zones (NRZ) are the primary trigger for arboricultural involvement on development sites. They are usually positioned radially around the trunk and cover an area which is deemed to be essential for the root system to be able to function properly in terms of uptake of water and nutrients from the soil to maintain a healthy crown and structurally sound main framework. When mechanical damage and soil compaction occur within these zones, it is expected to have negative, long-term impacts on the tree's overall health and condition. The dimensions of these zones will have been calculated during the initial site inspection or Preliminary Tree Assessment to determine what level of impact the proposed development will have on the trees. Trees on adjoining allotments with NRZ's that extend into the allotment to be developed will be included in this assessment.

NRZ's are also to be used during the design phase of the project to determine whether any proposed encroachments into these areas are likely to cause significant loss of roots which would likely affect the long-term health and condition of the trees.

Minor Encroachment

Proposed encroachments which take up 10% or less of the overall NRZ, have not had recent NRZ encroachments and are outside of the SRZ are classed as "Minor". It is unlikely that these will cause a significant impact to tree health, longevity or structure. To avoid a net loss of soil area and volume, an area equivalent to the encroachment is to be included within the TPZ, unless it is demonstrated by the Project Arborist that this area is not necessary. Detailed root investigations should not be required in the event of a minor encroachment.

Moderate Encroachment

Proposed encroachments which take up more than 10% and less than but including 20% of the overall NRZ and are outside of the SRZ are classed as "Moderate" and must be authorised by the project arborist. Should these occur, the project arborist shall demonstrate how the tree will remain viable, likely as part of the Tree Protection Specifications. To avoid a net loss of soil area and volume, an area equivalent to the encroachment is to be included within the TPZ, unless it is demonstrated by the Project Arborist that this area is not necessary.



Major Encroachment

Proposed encroachments which are greater than 20% and/or are located within the SRZ are classed as “Major”. In this instance the Project Arborist will be engaged to explore alternative designs with the design team and demonstrate how the tree will remain viable. To justify an encroachment of this magnitude, a more detailed investigation will be necessary and may include root investigations and mapping, soil analysis or literature reviews. To avoid a net loss of soil area and volume, an area equivalent to the encroachment is to be included within the TPZ, unless it is demonstrated by the Project Arborist that this area is not necessary.

The Notional Root Zones have been calculated for all trees which have been assessed during the Site Inspection for the purposes of this report.

Structural Root Zones

Structural Root Zones (SRZ) are the areas immediately surrounding the base of a tree and are essential to a tree’s stability. Like the NRZ, SRZ’s are usually positioned radially around a tree’s trunk. Any proposed encroachment into an SRZ area of any size is classed as “Conflicted”, meaning it will directly impact upon a tree’s stability. Detailed root investigations using non-destructive methods must be used to determine whether the proposed development will interfere with a tree’s root system, therefore destabilising the tree. If established roots are located within the encroachment area, the only viable options to proceed are design alterations or tree removal.

The Structural Root Zones have been calculated for all trees which have been assessed during the Preliminary Tree Assessment (initial inspection) for the purposes of this report.

Once the encroachments have been calculated, tree protection specifications will be provided to ensure that the proposed development remains in accordance with AS4970 –2025.

Additional Encroachment Considerations - AS4970 – 2025

Once the NRZ has been calculated and used in the creation of the design plans, it becomes the starting point for determining the dimensions of the Tree Protection Zone, the area required to be defined and protected throughout the construction phase of the project. The following factors will be considered by the Project Arborist in determining these zones:

- Location of roots and root development.
- Potential loss of root mass from the encroachment (number and diameter of roots).
- Tree species and tolerance to root disturbance.
- Age, health, current size and projected size of the tree.
- If the works will result in temporary (e.g. service trench) or permanent (e.g. basement carpark) loss of available soil volume.
- Presence of other trees with overlapping NRZ’s or grafted roots.



- Proposed staging and timing of excavation or root cutting.
- Proposed tree maintenance and tree care activities.
- Lean and stability of the tree.
- Soil characteristics and volume, topography and drainage.
- The presence of existing or past structures or obstacles affecting root growth or recent encroachments.
- Proposed construction measures that reduce the impact on the trees.
- Whether a root investigation is required. The location and distribution of the roots should be determined through minimally destructive investigation methods (pneumatic, hydraulic, hand digging or ground penetrating radar)

Once the encroachments have been calculated, tree management requirements will be provided to ensure that the proposed development remains in accordance with AS4970 –2025.

Crown Management

Tree crowns can be injured by machinery such as excavators, drilling rigs, cranes, trucks, hoarding installation and scaffolding. Where a trees crown is at risk of being damaged, its protection shall be addressed within the TPP and TPS.

Crown protection can include the following measures:

- a) Locating the tree protection fence outside of the crown in the affected area.
- b) Pruning of individual or specific branches.
- c) Tying back of branches.
- d) Use of flagging to make branches more visible.
- e) Branch protection (wrapping of branches).

If pruning is required, this shall be specified in accordance with Australian Standard AS 4373-2007: *Pruning of Amenity Trees*.



Arboricultural Impact Assessment Findings

The following table 1 shows the trees to be removed in order for the proposed design to proceed. Notional root zone and structural root zone calculations have been included, along with their respective encroachments. The annotated design drawings detailing this information can be found in *Appendix 2 – Site Encroachment Diagram*. Responses to the performance outcomes within Planning and Design Code – Regulated and Significant Tree Overlay can be found within Appendix 5.

Tree Number	Scientific Name	Common Name	Circumference (cm)	Legislative Status	Notional Root Zone (NRZ) [m]	NRZ Encroachment (%)	Structural Root Zone (SRZ) [m]	SRZ Encroachment (%)
1	<i>Fraxinus angustifolia</i>	Narrow-leaved Ash	192	Exempt Council Asset	6.95	22	2.94	Yes
2	<i>Brachychiton populneus</i>	Kurrajong	169	Regulated	6.24	21	2.68	Yes
3	<i>Callistemon viminalis</i>	Weeping Bottlebrush	236	Significant	6.07	67	2.88	Yes
5	<i>Cupressus sempervirens</i>	Mediterranean Cypress	129	Regulated	4.82	86	2.15	Yes
6	<i>Cupressus sempervirens</i>	Mediterranean Cypress	120	Regulated	4.68	88	2.36	Yes
9	<i>Cupressus sempervirens</i>	Mediterranean Cypress	105	Regulated	4.08	100	2.25	Yes
21	<i>Bauhinia acuminata</i>	White Bauhinia	160	Regulated	3.10	0	1.96	No
24	<i>Melaleuca armillaris</i>	Giant Honey Myrtle	133	Regulated	3.64	9	2.79	Yes
26	<i>Melaleuca armillaris</i>	Giant Honey Myrtle	274	Significant	4.78	14	2.63	No
28	<i>Melaleuca armillaris</i>	Giant Honey Myrtle	122	Regulated	3.31	6	2.36	No
40	<i>Acacia stenophylla</i>	Shoestring Acacia	234	Significant	6.02	5	2.98	Yes
53	<i>Metrosideros excelsa</i>	Pohutukawa	165	Regulated	3.62	24	2.63	Yes
56	<i>Jacaranda mimosifolia</i>	Jacaranda	185	Regulated	7.43	48	2.72	Yes

Table 1: Encroachment Calculation Data



The following table 2 shows the trees to be retained within the proposed design. Notional root zone and structural root zone calculations have been included, along with their respective encroachments.

Tree Number	Scientific Name	Common Name	Legislative Status	Circumference (cm)	Notional Root Zone (TPZ) [m]	NRZ Encroachment (%)	Structural Root Zone (SRZ) [m]	SRZ Encroachment (%)
35	<i>Laurus nobilis</i>	Bay Tree	Regulated	100	3.72	61	2.10	Yes (Existing)
37	<i>Cupressus sempervirens</i>	Mediterranean Cypress	Regulated	198	7.56	14	2.71	Yes (Footpath)
38	<i>Cupressus sempervirens</i>	Mediterranean Cypress	Regulated	198	7.56	20	2.74	Yes (Footpath)
47	<i>Fraxinus excelsior</i>	European Ash	Regulated	115	4.32	0	2.30	No
48	<i>Phoenix canariensis</i>	Canary Island Date Palm	Significant	270	10.32	0	3.52	No
65	<i>Phoenix canariensis</i>	Canary Island Date Palm	Significant	237	8.28	9	3.40	Yes (Footpath)
73	<i>Eucalyptus camaldulensis</i>	River Red Gum	Significant	286	10.44	3	3.35	No

Table 2: Encroachment Calculation Data



Arboricultural Impact Assessment Discussion

Tree 2 has been identified as a mature *Brachychiton populneus* – Kurrajong which is classed as “regulated” as defined within the *Planning, Development, and Infrastructure Act – 2016*. It is located on local government land and is therefore a local government owned asset. It has achieved a “moderate” retention rating as per the corresponding preliminary arboricultural assessment.

Due to the widening of the crossover at the main entrance to the site and the construction of the adjacent carpark, this tree will incur a major NRZ encroachment of 21% and a conflict with the SRZ when considering the proposed development. Design changes or special measures are not appropriate for the tree’s retention due to the retention rating being scored as “moderate”. For this proposed development to proceed, it is recommended that Tree 2 is removed prior to the commencement of works.

Tree 1 has been identified as a mature *Fraxinus angustifolia* – Narrow-leaved Ash which is classed as “exempt from legislative control” as defined within the *Planning, Development, and Infrastructure Act – 2016*. This is because this species is listed on the *Minister’s Notice – List of Exempt Species*, PlanSA. It is located on local government owned land and is therefore a local government owned asset. It is growing directly next to Tree 2 and shares the same root plate and will incur similar encroachments to Tree 2 when considering the proposed development, a major NRZ encroachment of 22% and a conflict with the SRZ. Design changes or special measures are not appropriate for the tree’s retention due to the classification as “exempt”. For this proposed development to proceed, it is recommended that Tree 1 is also removed prior to the commencement of works.

Both trees 1 and 2 are recommended to be removed at the same time (not one without the other) as they share the same root plate. The removal of one would destabilize the root plate of the remaining tree, causing an unacceptable level of risk to public safety.

Trees 3, 5, 6, 9, 24, 40, 53 and 56 are classed as “regulated” or “significant” as defined within the *Planning, Development, and Infrastructure Act – 2016*. They have achieved “moderate retention ratings within the corresponding preliminary tree assessment. Each of these will incur a major NRZ encroachment of more than 20% and/or a conflict with the SRZ when considering the proposed development. Design changes or special measures are not appropriate for these trees’ retention due to their retention ratings as “moderate”. For this proposed development to proceed, it is recommended that they are removed prior to the commencement of works.

Trees 21, 26 and 28 are classed as “regulated” or “significant” as defined within the *Planning, Development, and Infrastructure Act – 2016*. They have achieved “moderate retention ratings within the corresponding preliminary tree assessment. They will incur minor or moderate encroachments of less than 20% and no conflict with the SRZ when considering the proposed



development. These trees are located next to the Northern boundary wall within an area which is proposed to be planted with a neat row of various ornamental trees. These three existing trees are not in keeping with the broader scope of the development and will not contribute positively to the visual amenity of the area post-completion. It is therefore recommended that they are removed prior to the commencement of works.

Tree 35 is classed as “regulated” as defined within the *Planning, Development, and Infrastructure Act – 2016*. Due to the tree’s dense, multi stemmed growth habit, having regrown from a previously cut-down tree stump, measurement of each individual stem was not attainable. It could be seen that on average, each stem had a circumference of greater than 310mm, but all were less than 625mm. The discussion has been made by Treesense to account for the trunk measurements of this tree to be inferred as the largest that can be attained by a regulated tree.

Despite the retention rating being assessed as “moderate”, the major proposed NRZ encroachment of 61% and the proposed conflict with the SRZ, it is the Client’s desire to retain this tree. As the proposed encroachment at this stage is to be an outdoor decking area, tree sensitive design and construction methodologies will be required to ensure its retention. Regular, on-going monitoring will be recommended to assess the tree’s overall condition as the development progresses. In the event that a severe decline of the tree’s condition is observed, it would be appropriate to remove this tree at a later stage and replace with a more suitable specimen.

Trees 37 and 38 are classed as “regulated” as defined within the *Planning, Development, and Infrastructure Act – 2016*. They have achieved “high” retention ratings within the corresponding preliminary tree assessment. Due to the upgrade of the footpath which is located between these trees, they will incur moderate NRZ encroachments and conflict with the SRZ. In order to resolve this issue and carry out the necessary upgrade to the footpath, special tree protection measures will be implemented to ensure their retention. These can be found under the following section “Requirements”.

Trees 47 and 48 are classed as “regulated” or “significant” as defined within the *Planning, Development, and Infrastructure Act – 2016*. They have achieved “moderate” retention ratings within the corresponding preliminary tree assessment. They will not incur encroachments into the NRZ’s or conflict with the SRZ’s when considering the proposed development. They are recommended to be retained, tree protection measures in accordance with AS4970-2025: *Protection of trees on development sites* will be required to be implemented to ensure they remain in their current condition during and following this project.

Tree 65 is classed as “significant” as defined within the *Planning, Development, and Infrastructure Act – 2016*. It has achieved a “moderate” retention rating within the corresponding preliminary tree assessment. Due to the upgrade of the footpath which is located within the proximity of this tree, a minor NRZ encroachment and conflict with the SRZ



will be incurred. In order to resolve this issue and carry out the necessary upgrade to the footpath, special tree protection measures will be implemented to ensure its retention. These can be found under the following section “requirements”.

Tree 73 is classed as “significant” as defined within the *Planning, Development, and Infrastructure Act – 2016*. It is located in an adjacent area with the NRZ overlapping the site by 3%. No work is expected to be carried out that would be detrimental to this tree’s health or structure and therefore tree protection measures do not need to be implemented to ensure it remains in its current condition throughout the project.



Requirements

Pre – Development

1. A Project Arborist needs to be appointed and consulted on all matters relating to the care and maintenance of the trees which have been included within this assessment.
2. The removal of the trees 1, 2, 3, 5, 6, 9, 21, 24, 26, 28, 40, 53 and 56 as outlined in the previous section is to be carried out prior to the commencement of any works, for this development to proceed.
3. The requirements outlined in this section are to provide instructions outlining the appropriate methods of demolition and construction within the NRZ's of the tree to be retained. These will serve as Tree Protection Specifications (TPS).
4. Tree protection measures in accordance with Australian Standard AS4970 – 2025: *Protection of trees on development sites* must be followed as a minimum to ensure any tree to be retained remains in its current condition throughout the duration of the project, an extract of which can be found in appendix 6.
5. Protective fencing is to be erected to define and protect the Tree Protection Zones (TPZs). This will serve to prevent unauthorised entry into the TPZ's, and each zone is to be clearly signed TREE PROTECTION ZONE – NO ACCESS. These signs will also clearly display the project arborist's name, company and contact details. An example of this sign can be found within appendix 7
6. The radius of the TPZ is equal to the radius of the NRZ for the purpose of this report. Appendix 8 shall be used to provide TPZ fence location instructions for the Tree Protection Plan (TPP).
7. The fences must be constructed with sturdy temporary fencing and be at least 1.8 metres high. They are to be installed prior to the commencement of any demolition works or removal of materials and are to be removed once the development is completed.

Development

1. Storage of materials and equipment or temporary building is not permitted within the TPZ's.
2. Nothing is to be attached to the trees, including temporary service wires, nails, screws, signs, or any other fixing device.
3. Mulch is to be installed, and additional water is to be supplied within the TPZ's during the development phase. This will reduce potential shock or decline in health to the trees which may occur due to minor changes to their growing environment.
4. Any construction or excavation work which must take place within the TPZ's is to be carried out under the guidance of the Project Arborist. Specific requirements will be advised, based on the tasks which are to be carried out.



5. For Trees 37, 38 and 65, works to be completed within the SRZ must be undertaken with the project arborist present on site, and carried out under their direct supervision.
6. The project arborist is to retain full authority to stop works and request modification of the design if any root within the SRZ is encountered.
7. Any exposed roots must be re-covered immediately using original material in the event they are discovered in the SRZ.
8. The installation of underground services within the TPZ must be undertaken using tree-sensitive techniques, such as hydro-excavation or hand digging and under the direction of the project arborist. No roots greater than 30 mm in diameter are to be severed unless deemed necessary by the project arborist.
9. All roots greater than 30 mm in diameter must be retained wherever practicable. If root severance is unavoidable, roots are to be cleanly pruned at the trench face using sharp, sterilised tools. Exposed roots must be immediately covered and kept moist during any period of exposure to prevent desiccation and decline. All such root management activities must be authorised and documented by the project arborist.
10. Arborist Memorandum's will be issued by the Project Arborist at key stages of the development, where deemed appropriate or necessary to confirm compliance with tree protection requirements.

Post – Development

1. The Project Arborist will inspect the trees once the development has been completed. This is to verify that the tree's health has not declined during the development phase and to recommend any remedial measures as required.
2. Where deemed appropriate, final certification of compliance will be issued by the Project Arborist to confirm that all tree protection requirements have been met.

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References

- *Australian Standard AS 4970 – 2025: Protection of Trees on Development Sites.*
- *Planning, Development and Infrastructure Act – 2016*
- *Planning, Development and Infrastructure (General) Regulations – 2017*
- *South Australia's Planning and Design Code – Plan SA*



Glossary of Terms

Age: An indication of the maturity of the tree.

Circumference: Trunk circumference measured at one metre above ground level. This is used to determine the tree's legislative status within the *Planning, development and infrastructure Act – 2016*.

Declared Weed Species: a plant that has been formally declared under the Landscape South Australia Act 2019 because it poses a threat to agriculture, the environment, or the community.

Diameter at Standard Height (DSH): Trunk diameter measured at 1.4 metres above ground level and used to determine the Tree Protection Zone as described in Australian Standard AS 4970 – 2025 *Protection of Trees on Development Sites*.

Diameter at Root Buttress (DRB): Trunk diameter measured just above the root buttress and used to determine the Structural Root Zone as described in Australian Standard AS 4970 – 2025 *Protection of Trees on Development Sites*.

Form: A visual assessment of tree form.

Health: A visual assessment of tree health.

Notional Root Zone (NRZ): An area around a tree nominally taken to represent the likely spread of major roots.

Size: An approximation of the tree's height and width, expressed in metres.

Structure: A visual assessment of tree structure.

Structural Root Zone (SRZ): The area within a tree's root zone which is essential for maintaining stability.

Tree Damaging Activity: As defined within the *Planning, Development, and Infrastructure Act – 2016*.

Tree Protection Zone (TPZ): An area (radius) around the base of a tree trunk where development activity is not permitted. Activity within this area will lead to tree damage, this is the main method for protecting trees on development sites.

Useful Life Expectancy (ULE): The expected number of years a tree will remain alive and be considered an asset to its locality.



Appendices

1. Complete Tree Data
2. Site Encroachment Diagram
3. Relevant Legislation
4. Planning and Design Code Performance Outcomes – Regulated and Significant Trees
5. Tree Protection Zone General Guidelines
6. Tree Protection Zone: Sign Example
7. Tree Protection Plan

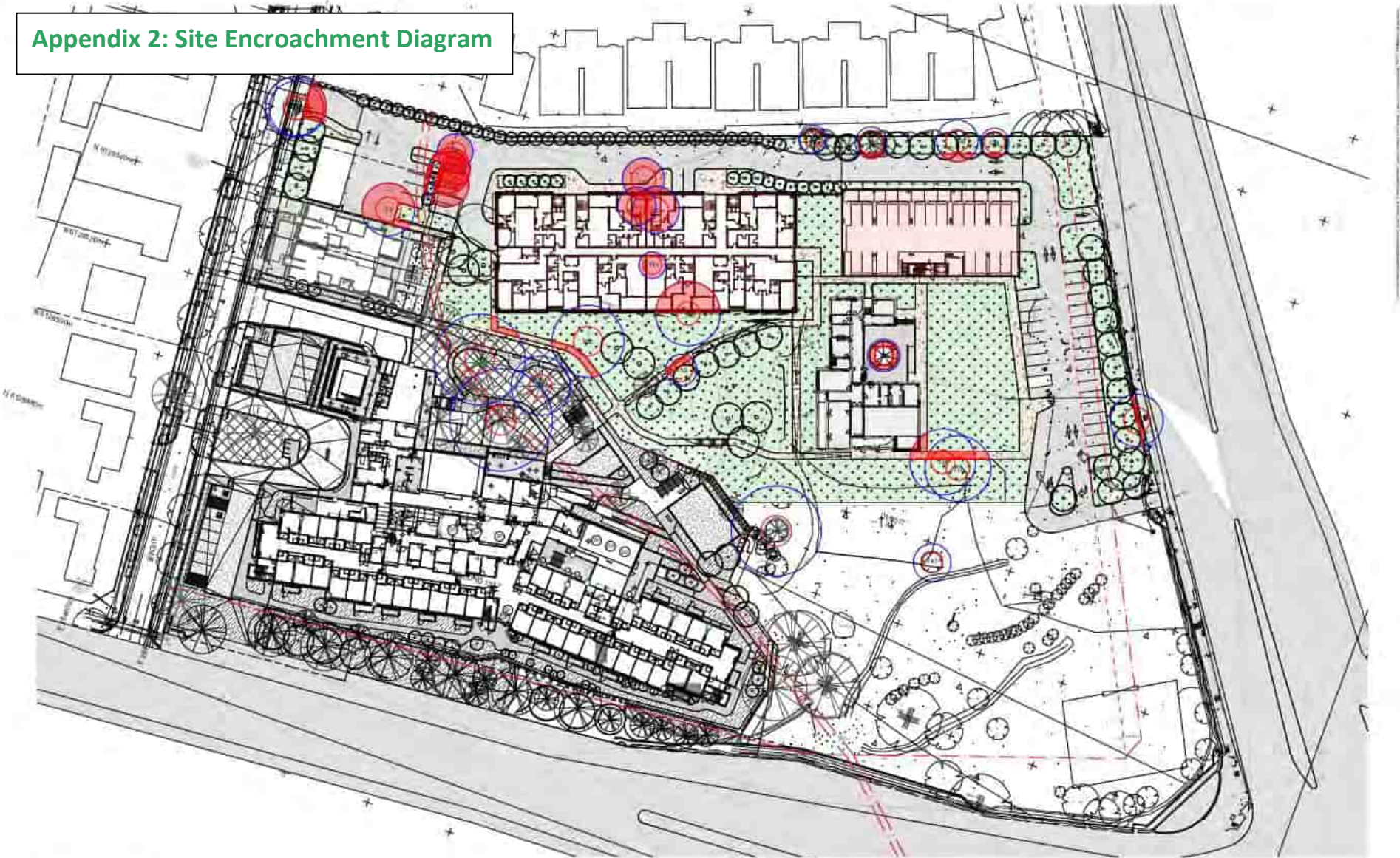


Appendix 1: Complete Tree Data

Tree Number	Common Name	Tree Height (Estimated) [m]	Crown Spread (m)	Useful Life Expectancy	Health	Structure	Form	Legislative Status	Species Origin	Habitat Value	Aesthetic Appearance	Character	Retention Value	Requirements
1	Narrow-leaved Ash	11	10 to 15	>20 years	Good	Good	Fair	Exempt - List of Exempt Species	Exotic	Potential	High	Important	High	Remove
2	Kurrajong	9	5 to 10	>20 years	Good	Good	Fair	Regulated	Native	Potential	High	Important	High	Remove
3	Weeping Bottlebrush	5	5 to 10	10-15 years	Good	Fair	Fair	Significant	Native	Potential	Moderate	Moderate	Moderate	Remove
5	Mediterranean Cypress	8	< 5	>20 years	Good	Good	Good	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Remove
6	Mediterranean Cypress	10	< 5	>20 years	Fair	Good	Good	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Remove
9	Mediterranean Cypress	10	< 5	>20 years	Fair	Good	Good	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Remove
21	White Bauhinia	4	< 5	10-15 years	Good	Good	Poor	Regulated	Exotic	No Habitat	Low	Low	Low	Remove
24	Giant Honey Myrtle	5	5 to 10	5-10 years	Good	Poor	Fair	Regulated	Indigenous	Potential	Moderate	Moderate	Moderate	Remove
26	Giant Honey Myrtle	5	5 to 10	15-20 years	Good	Good	Good	Regulated	Indigenous	No Habitat	Moderate	Moderate	Moderate	Remove
28	Giant Honey Myrtle	4	5 to 10	15-20 years	Good	Fair	Good	Regulated	Indigenous	No Habitat	Moderate	Moderate	Moderate	Remove
35	Bay Tree	7	5 to 10	15-20 years	Good	Good	Fair	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Retain
37	Mediterranean Cypress	16	< 5	>20 years	Good	Good	Good	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Retain
38	Mediterranean Cypress	16	< 5	>20 years	Good	Good	Good	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Retain
40	Shoestring Acacia	8	10 to 15	>20 years	Good	Good	Good	Significant	Indigenous	Potential	Moderate	Moderate	Moderate	Remove
47	European Ash	6	5 to 10	>20 years	Good	Good	Good	Regulated	Exotic	No Habitat	Moderate	Moderate	Moderate	Retain
48	Canary Island Date Palm	7	5 to 10	>20 years	Good	Good	Good	Significant	Exotic	Active	Moderate	Moderate	Moderate	Retain
53	Pohutukawa	4	5 to 10	>20 years	Good	Good	Fair	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Remove
56	Jacaranda	8	10 to 15	>20 years	Good	Good	Good	Regulated	Exotic	Potential	Moderate	Moderate	Moderate	Remove
65	Canary Island Date Palm	7	5 to 10	>20 years	Good	Good	Good	Significant	Exotic	Potential	Moderate	Moderate	Moderate	Retain
73	River Red Gum	17	15 to 20	>20 years	Good	Good	Good	Significant	-	-	-	-	-	Tree not on site (consider NRZ)



Appendix 2: Site Encroachment Diagram



SITE PLAN - OVERALL
1:500

REASON FOR ISSUE	REV	DATE
Issue 1: Clearance	1	21/01/2024
Issue 2: Tree Protection	2	16/02/2024



CARMELITE STAGE 2 DEVELOPMENT
7 SPENCE AVENUE, MYRTLE BANK SA, 5064

DATE	BY	REVISION
16/02/2024	CB	1
21/01/2024	CB	2



Appendix 3: Indicative Tree Location Plan



Indicative Tree Location Plan
7 Spence Avenue, Myrtle Bank, South Australia,
5064

Plotted by: C. Pate
Date: 29/10/2025



Appendix 4: Relevant Legislation

Planning, Development and Infrastructure Act - 2016

16.5.2024—Planning, Development and Infrastructure (General) Regulations 2017
Preliminary—Part 1

3F—Regulated and significant trees

- (1) Subject to this regulation, the following are declared to constitute classes of regulated trees for the purposes of paragraph (a) of the definition of *regulated tree* in section 3(1) of the Act, namely trees within a designated regulated tree overlay that have a trunk with a circumference of 1 m or more or, in the case of trees that have multiple trunks, that have trunks with a total circumference of 1 m or more and an average circumference of 310 mm or more, measured at a point 1 m above natural ground level.
- (2) Subject to this regulation—
 - (a) a prescribed criterion for the purposes of paragraph (b) of the definition of *significant tree* in section 3(1) of the Act is that a regulated tree under subregulation (1) has a trunk with a circumference of 2 m or more or, in the case of a tree with multiple trunks, has trunks with a total circumference of 2 m or more and an average circumference of 625 mm or more, measured at a point 1 m above natural ground level; and
 - (b) regulated trees under subregulation (1) that are within the prescribed criterion under paragraph (a) are to be taken to be significant trees for the purposes of the Act.
- (3) For the purposes of subregulations (1) and (2), the measurement of the circumference of the trunks of a tree with multiple trunks is to be undertaken on the basis of the actual circumference of each trunk and without taking into account any space between the trunks.
- (4) Subregulations (1) and (2) do not apply—
 - (a) to a tree located within 3 m of an existing dwelling or an existing in-ground swimming pool, other than a tree within 1 of the following species (or genus) of trees:
 - Agonis flexuosa* (Willow Myrtle)
 - Angophora* (any tree of the genus)
 - Corymbia* (any tree of the genus)
 - Eucalyptus* (any tree of the genus); or
 - (b) to a tree of a species designated (from time to time) by the Minister by notice published on the SA planning portal; or
 - (c) to a tree belonging to a class of plants to which a declaration by the Minister under Part 9 Division 1 of the *Landscape South Australia Act 2019* applies; or
 - (d) to a tree that may not be cleared without the consent of the Native Vegetation Council under the *Native Vegetation Act 1991*; or
 - (e) to a tree planted as part of a woodlot, orchard or other form of plantation created for the purpose of growing and then harvesting trees or any produce.
- (4a) A notice under subregulation (4)(b) designating a species of tree—
 - (a) may be of general or limited application; and



Planning, Development and Infrastructure (General) Regulations 2017—16.5.2024

Part 1—Preliminary

- (b) without limiting paragraph (a), may make different provision in relation to a species of tree according to the location of the tree, the circumstances or any other specified factor.
- (5) For the purposes of subregulation (4), the distance between a dwelling or swimming pool and a tree will be measured from the base of the trunk of the tree (or the nearest trunk of the tree to the dwelling or swimming pool) to the nearest part of the dwelling or swimming pool at natural ground level.

Note—

The scheme set out in subregulations (1) to (5) relates to the declaration of trees to be regulated trees or significant trees by regulations under the Act. A tree may also be declared to be a significant tree by the Planning and Design Code, and such a declaration has effect independently from those subregulations.

- (6) For the purposes of the definition of *tree damaging activity* in section 3(1) of the Act, pruning—
 - (a) that does not remove more than 30% of the crown of the tree; and
 - (b) that is required to remove—
 - (i) dead or diseased wood; or
 - (ii) branches that pose a material risk to a building; or
 - (iii) branches to a tree that is located in an area frequently used by people and the branches pose a material risk to such people; and
 - (c) that is undertaken at least 5 years after pruning of a kind referred to in this subregulation was last undertaken in relation to the tree,
 is excluded from the ambit of that definition.



Appendix 5: Planning and Design Code Performance Outcomes – Regulated and Significant Trees to be Removed

Included within this section are the responses to the Performance Outcomes regarding the trees’ suitability for removal.

Regulated and Significant Tree Overlay

Assessment Provisions (AP)

Regulated Trees to be Removed in Connection with a Development							
Performance Outcome	Tree 2	Trees 5, 6 and 9	Tree 21	Trees 24 and 26	Tree 28	Tree 53	Tree 56
<p>PO 1.1 Regulated trees are retained where they:</p> <p>a. Make an important visual contribution to local character and amenity</p>	<p>Yes. This tree does make an important visual contribution to local character and amenity, due to its level of establishment and visibility from public areas.</p>	<p>Yes. These trees do make an important visual contribution to local character and amenity, due to their level of establishment and visibility from public areas.</p>	<p>No. This tree does not make an important visual contribution to local character and amenity due to its relatively small size and limited visibility from nearby public areas.</p>	<p>No. These trees do not make an important visual contribution to local character and amenity due to their relatively small size and limited visibility from nearby public areas.</p>	<p>No. This tree does not make an important visual contribution to local character and amenity due to its relatively small size and limited visibility from nearby public areas.</p>	<p>No. This tree does not make an important visual contribution to local character and amenity due to its relatively small size and limited visibility from nearby public areas.</p>	<p>No. This tree does not make an important visual contribution to local character and amenity due to its moderate size and limited visibility from nearby public areas.</p>
<p>b. Are indigenous to the local area and listed under the <i>National Parks and Wildlife Act 1972</i> as a rare or endangered native species</p>	<p>No. This tree is not indigenous to the local area and listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>	<p>No. These trees are not indigenous to the local area and are not listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>	<p>No. This tree is not indigenous to the local area and are not listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>	<p>No. These trees are not indigenous to the local area and are not listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>	<p>No. This tree is not indigenous to the local area and are not listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>	<p>No. This tree is not indigenous to the local area and are not listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>	<p>No. This tree is not indigenous to the local area and are not listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>



Regulated Trees to be Removed in Connection with a Development							
Performance Outcome	Tree 2	Trees 5, 6 and 9	Tree 21	Trees 24 and 26	Tree 28	Tree 53	Tree 56
and / or c. Provide an important habitat for native fauna.	No. This tree does not provide an important habitat for native fauna.	No. These trees do not provide an important habitat for native fauna.	No. This tree does not provide an important habitat for native fauna.	No. These trees do not provide an important habitat for native fauna.	No. This tree does not provide an important habitat for native fauna.	No. This tree does not provide an important habitat for native fauna.	No. This tree does not provide an important habitat for native fauna.
PO 1.4 A tree-damaging activity in connection with other development satisfies all the following: a. It accommodates the reasonable development of land in accordance with the relevant zone or subzone where such development might not otherwise be possible	Yes. Reasonable development of the land would not be possible if this tree was to be retained. Due to its proximity to the crossover, which is to be widened, and the construction of the adjacent carpark.	Yes. Reasonable development of the land would not be possible if these trees were to be retained. They are located within an area to be upgraded as part of the driveway and carpark. Their retention would directly conflict with this.	Yes. This tree is in an area which is proposed to be part of a planting scheme of neat rows of ornamental trees. The retention of this tree would not contribute to the visual amenity alongside the newly planted trees. Due to poor form.	Yes. These trees are in an area which is proposed to be part of a planting scheme of neat rows of ornamental trees. The retention of these trees would not contribute to the visual amenity alongside the newly planted trees. Due their assessed “poor” structure and reduced ULE.	Yes. This tree is in an area which is proposed to be part of a planting scheme of neat rows of ornamental trees. The retention of this tree would not contribute to the visual amenity alongside the newly planted trees. Due its assessed “fair” structure and reduced ULE.	Yes. This tree is located in an area where a proposed footpath is to be constructed. Retention of this tree would not contribute positively to the proposed design due to the assessed “fair” form and moderate aesthetic value.	Yes. This trees location directly conflicts with the proposed construction of the main retirement building. Altering an otherwise reasonable design is not an appropriate course of action to retain this tree.
PO 2.1 Regulated and significant trees, including their root systems, are not unduly compromised by excavation and / or filling of land, or the sealing of surfaces within the vicinity of the tree to support their retention and health.	No. Attempting to retain the tree whilst proceeding with the development, this PO would not be achievable.	No. Attempting to retain these trees whilst proceeding with the development, this PO would not be achievable.	No. Attempting to make this PO achievable would be a poor use of funds as the tree will not contribute positively to the area post-development.	No. Attempting to make this PO achievable would be a poor use of funds as these trees will not contribute positively to the area post-development.	No. Attempting to make this PO achievable would be a poor use of funds as the tree will not contribute positively to the area post-development.	No. Attempting to make this PO achievable would be a poor use of funds as the tree will not contribute positively to the area post-development.	No. Attempting to make this PO achievable would be a poor use of funds as it would necessitate a redesign of the retirement building for a tree with moderate amenity contribution.



Significant Trees to be Removed in Connection with a Development		
Performance Outcome	Tree 3	Tree 40
<p>PO 1.2 Significant trees are retained where they:</p> <p>a. Make an important contribution to the character or amenity of the local area</p>	<p>No. This tree does not make an important visual contribution to local character and amenity due to its “fair” form and structure, reduced ULE, and partial visibility from public areas.</p>	<p>No. This tree does not make an important visual contribution to local character and amenity due to it having outgrown its environment and subsequent structural damage to the retaining wall.</p>
<p>b. Are indigenous to the local area and are listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species</p>	<p>No. This tree is not indigenous to the local area and listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>	<p>No. This tree is not indigenous to the local area and listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.</p>
<p>c. Represent an important habitat for native fauna</p>	<p>No. This tree does not provide an important habitat for native fauna.</p>	<p>No. This tree does not provide an important habitat for native fauna.</p>
<p>d. Are part of a wildlife corridor of a remnant area of native vegetation</p>	<p>No. This tree is not part of a wildlife corridor of a remnant area of native vegetation as the species is not indigenous to the local area.</p>	<p>No. This tree is not part of a wildlife corridor of a remnant area of native vegetation as the species is not indigenous to the local area.</p>
<p>e. Are important to the maintenance of biodiversity in the local environment and / or</p>	<p>No. This tree is not important to the maintenance of biodiversity in the local environment due to the reduced ULE and absence of habitat options.</p>	<p>No. This tree is not important to the maintenance of biodiversity in the local environment due to the reduced ULE and absence of habitat options.</p>
<p>f. Form a notable visual element to the landscape of the local area.</p>	<p>No. This tree does not form a notable visual element to the landscape of the local area. Due to the form and structure being assessed as “fair”.</p>	<p>No. This tree does not form a notable visual element to the landscape of the local area. Due to the partial visibility from nearby public areas.</p>
<p>PO 1.4 A tree-damaging activity in connection with other development satisfies all the following:</p> <p>a. It accommodates the reasonable development of land in accordance with the relevant zone or subzone where such development might not otherwise be possible</p>	<p>Yes. The reasonable development of the land would not be possible if the tree was to be retained. It conflicts with the proposed carpark and has a reduced ULE so is not worth retaining.</p>	<p>Yes. The reasonable development of the land would not be possible if the tree was to be retained. Necessary repair works to the damaged retaining wall would involve substantial root damage within the SRZ.</p>
<p>b. In the case of a significant tree, all reasonable development options and design solutions have been considered to prevent substantial tree-damaging activity occurring.</p>	<p>Yes. No other design solutions or development options are appropriate as the tree has limited amenity value.</p>	<p>Yes. No other design solutions or development options are appropriate as the tree is causing structural damage to the retaining wall.</p>



Significant Trees to be Removed in Connection with a Development		
Performance Outcome	Tree 3	Tree 40
<p>PO 2.1 Regulated and significant trees, including their root systems, are not unduly compromised by excavation and / or filling of land, or the sealing of surfaces within the vicinity of the tree to support their retention and health.</p>	<p>No. Attempting to make this PO achievable would be a poor use of funds as the tree will not contribute positively to the area post-development.</p>	<p>No. Attempting to make this PO achievable would be a poor use of funds as the tree will not contribute positively to the area post-development.</p>



Appendix 6: Tree Protection Zones General Guidelines

Included below for reference is an extract of Australian Standard AS4970-2025 *Protection of Trees on Development Sites*, Section 4, to provide general information regarding tree protection measures within a TPZ.

Section 4 Tree protection measures

4.1 General

Tree protection measures include a range of activities, structures and devices used to identify and isolate the TPZ, as outlined in Section 3. These measures are documented in the AIA, the TPS and the TPP.

The TPZ is a restricted zone usually delineated by protective fences (or using an existing structure such as a fence or wall) or other physical protection methods. The management of the TPZ shall commence prior to site establishment and continue until completion of the works. This management can require the TPS to define critical stages that require the attendance of the project arborist.

Before any additional TPZ encroachment occurs, the encroachment shall be reviewed and confirmed to be acceptable to the project arborist and, if required, the relevant authority. Some works and activities within the TPZ may require the consent of the relevant authority.

Tree removal and pruning approved by the relevant authority should be carried out before the installation of tree protection measures.

4.2 Activities generally excluded from the TPZ

These include but are not limited to the following:

- (a) Excavation, cultivation or disturbance of the soil, including scraping of the surface.
- (b) Equipment and material storage.
- (c) Preparation of chemicals, including preparation of cement products.
- (d) Movement or parking of vehicles and plant.
- (e) Dumping of waste.
- (f) Spreading or stockpiling of fill.
- (g) Refuelling.
- (h) Washing down and cleaning of equipment or hard surfaces.
- (i) Fires.
- (j) Physical damage to the tree.



Activities specified in items (a) to (e) may be permitted with appropriate protection measures, as detailed in the TPS and TPP.

4.3 Protective fences

Fences should be erected before any machinery or materials are brought onto the site and before the commencement of works, including demolition, or in accordance with the TPS and as shown on the TPP. Once erected, protective fencing shall not be removed or altered without approval by the project arborist except in accordance with the TPS.

The fence should restrict access to the enclosed portion of the TPZ. Semi-permanent fences or options that make it difficult to move the fence should be considered where appropriate.

AS 4687.2 specifies applicable requirements where temporary fence panels are used. Where semi-permanent fences are used, the posts should be driven into the soil 600 mm (1 000 mm in sand), and top rails should be used as required.

Existing perimeter fences and other structures may be used as part of the protective fence if suitable.

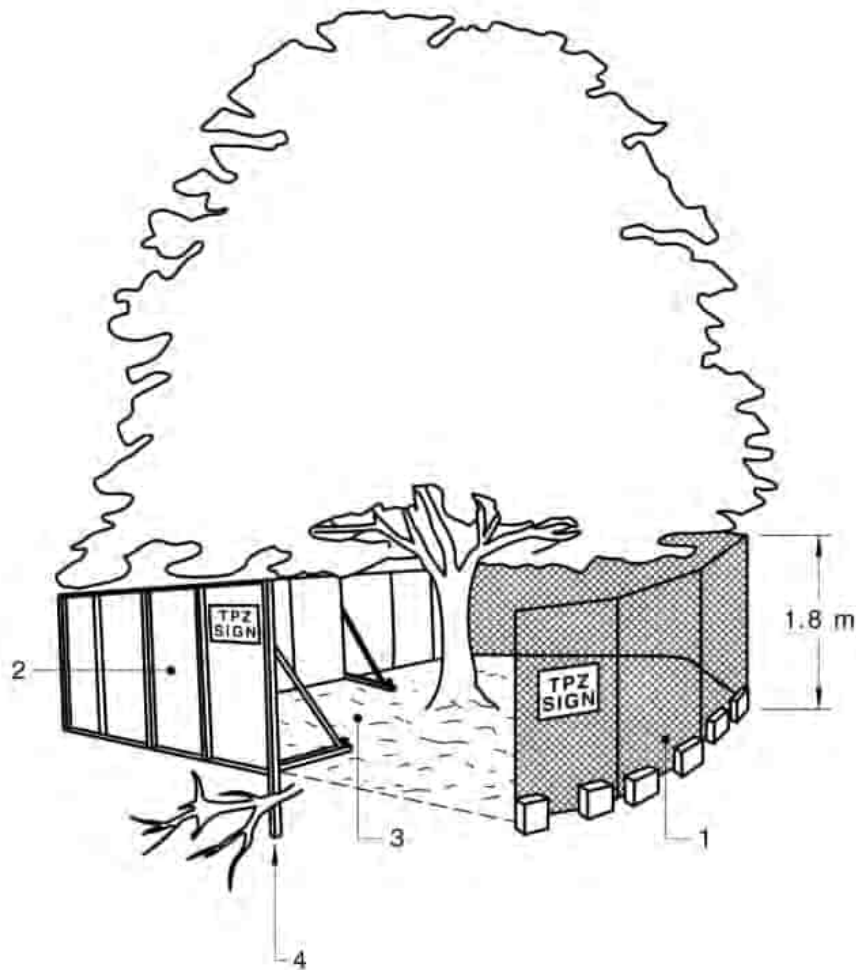
Figure 4 indicates an example of protective fences.

4.4 Signs

Signs identifying the TPZ should be placed around the edge of the TPZ and be visible from within the development site, as shown in **Figure 4**. The Signs should conform to **AS 1319**.



Figure 4 – Protective fences

**KEY:**

¹ Chain wire mesh panels that are held in place with concrete feet.

² Alternatively, plywood or wooden paling fence panels may be used. This fencing material also prevents building materials or soil from entering the TPZ.

³ Mulch installation across the surface of the TPZ (as detailed in the TPS). No excavation, construction activity grade changes, surface treatment or storage of materials of any kind is permitted within the TPZ other than those indicated in the TPS.

⁴ Bracing may be used within the TPZ. Installation of posts or supports should avoid damaging roots.

4.5 Other tree protection measures

4.5.1 General

When tree protection fences cannot be installed or require temporary removal, other tree protection measures should be used and are set out as follows.



4.5.2 Trunk and branch protection

Trunk and branch protection shall be installed where specified in the TPS or conditions of consent, or as shown on the TPP (see **Figure 5**).

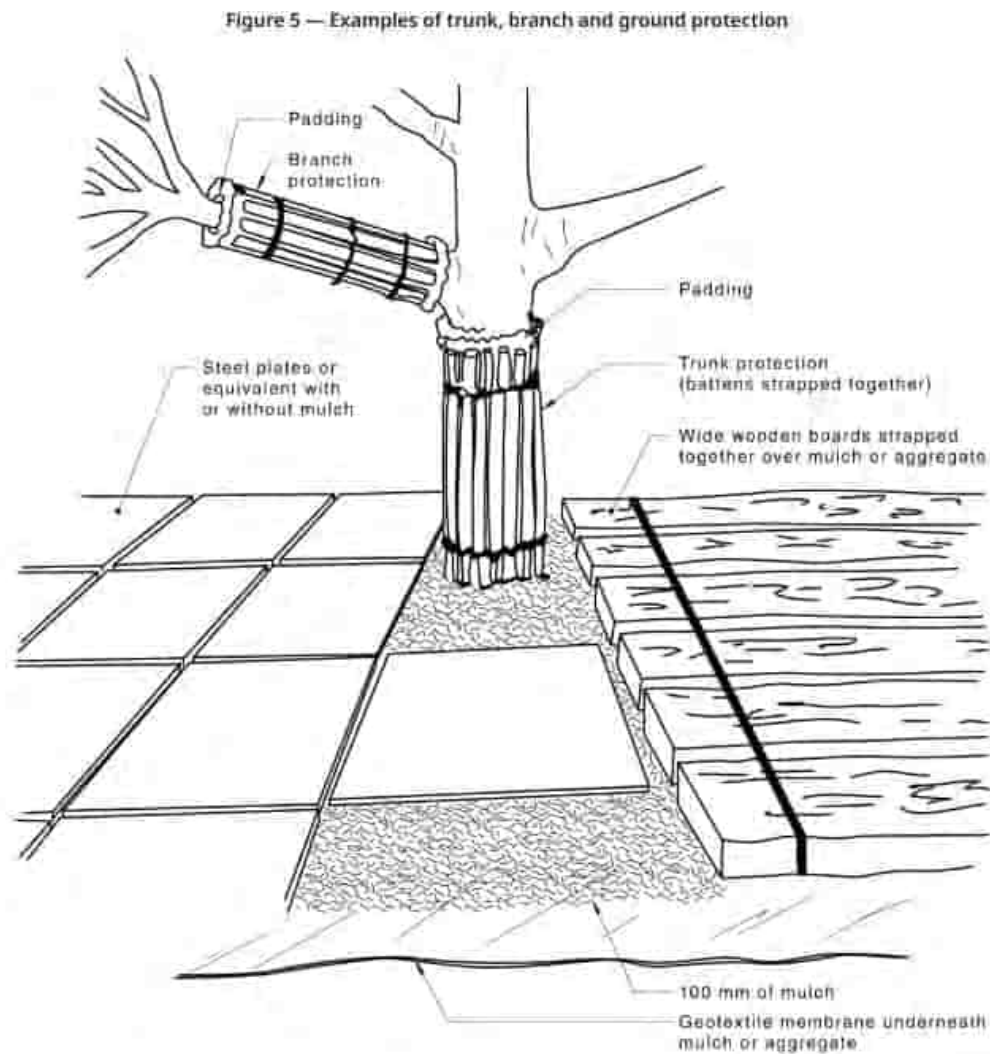
Temporary powerlines, stays, guys, structures and the like shall not be attached to the tree (unless specifically permitted in the TPS).

4.5.3 Ground protection

Ground protection measures shall be implemented if regular pedestrian access or temporary access for machinery is required within the TPZ. Ground protection aims to prevent root damage and soil compaction within the TPZ (see **Figure 5**).

These measures may be applied to root zones beyond the TPZ.

NOTE: Existing hard surfaces, such as driveways or concrete slabs, can be considered suitable ground protection.



NOTE 1 For trunk and branch protection, boards and padding may be used to prevent damage to bark. Boards shall be joined to each other using hoop straps and screws or similar. They shall not be screwed or nailed to the tree.

NOTE 2 Wide wooden boards or plastic or metal plates should be of a suitable thickness to spread the load and prevent soil compaction and root damage.



4.5.4 Root protection during work within the TPZ

Some approved works within the TPZ, such as scalping, excavation, installation of piers, or landscaping, can damage roots.

If the grade is to be raised, the material should be coarser or more porous than the underlying material. Depth and compaction should be minimized. The details should be specified by a soil specialist if necessary.

Manual excavation should be carried out under the supervision of the project arborist, who will identify and document roots, considering the impact of potential root pruning on tree stability and ongoing health. It is possible that relocation or redesign of works or actions to minimize the impact will be necessary.

Where roots are to be pruned within or in close proximity to the TPZ, they shall be pruned as outlined in **AS 4373** unless otherwise directed by the project arborist.

Where roots within or along the margins of the TPZ are exposed by excavation, the trench should be backfilled as quickly as possible. This backfill may be temporarily managed using plywood or similar to retain a suitable backfill material. Appropriate soil moisture should be maintained, as stated in the TPS.

Other excavation work near trees, including landscape work such as paving, irrigation and planting, can adversely affect root systems. These should be considered and addressed in the TPS.

4.5.5 Installing underground services within the TPZ

All services should be routed outside the TPZ. If underground services need to be routed within the TPZ, they should be installed by directional drilling, hand-excavated pits and trenches, or as specified by the project arborist.

The upper surface of the directional drilling bore should be at least 0.6 m deep and preferably outside the SRZ. Assessment of the likely impacts of boring, launch pits and exit pits on retained trees should be undertaken.

For manual excavation of trenches, the project arborist should advise on roots to be retained and should monitor the works. Manual excavation may include using hand tools and other minimally destructive equipment.

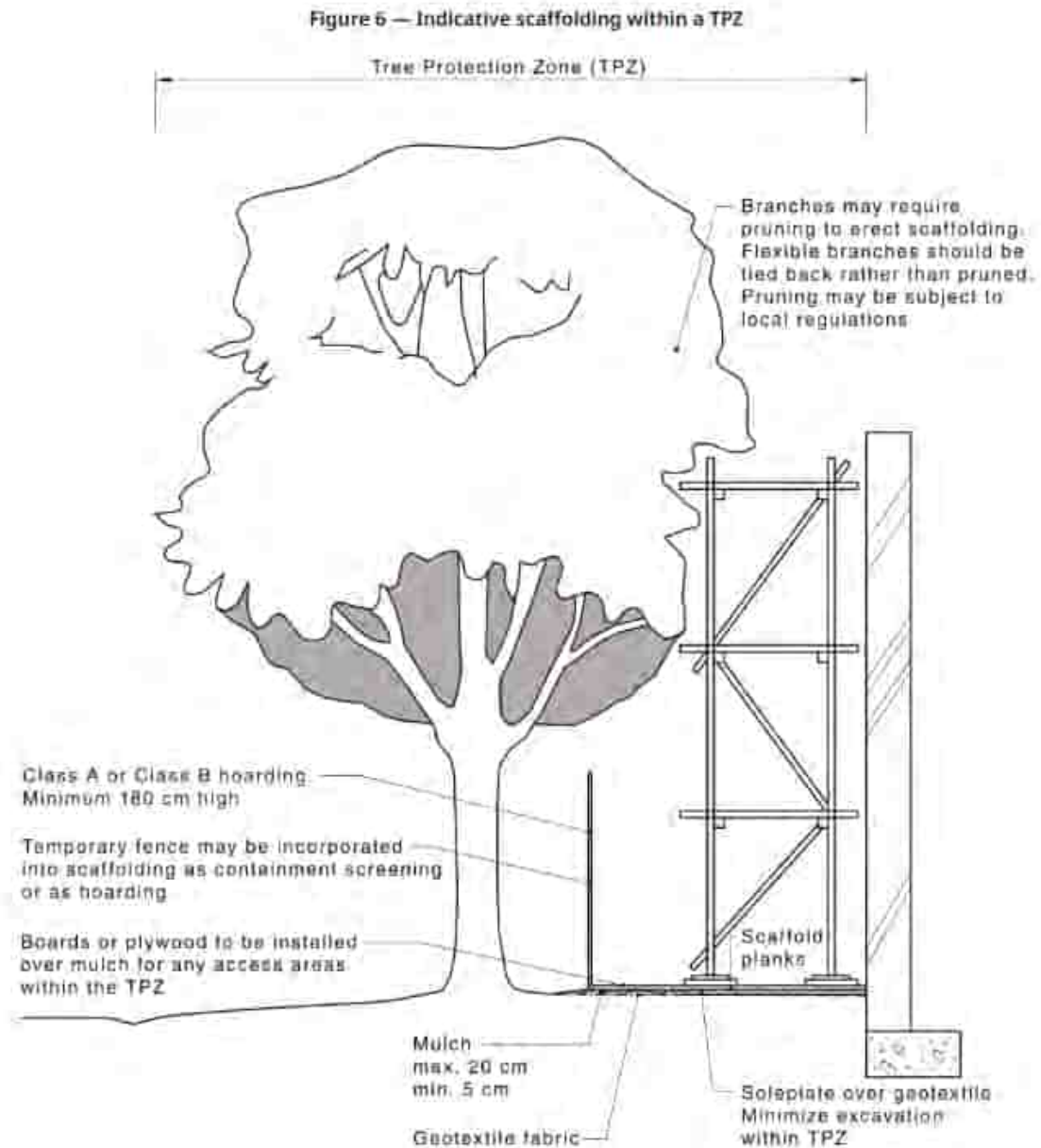
4.5.6 Scaffolding

Where scaffolding is required, it should be erected outside the TPZ. When this is not possible, branch removal should be minimized. This may be achieved by designing or narrowing the scaffolding to avoid branches or tying branches back. Where the relevant authority provides consent, pruning shall be performed as specified and following the process outlined in **AS 4373**.



The ground below the scaffolding should be protected by boarding (e.g. scaffold board or plywood sheeting), as shown in **Figure 6**, to collect falling contaminants such as mortar, render, etc. Where access is required, ground protection should be installed to minimize soil compaction. The ground protection should be left in place until the scaffolding is removed; see **Clause 4.5.3** for details of ground protection measures.

Excavation for sole plates or footings of the scaffold should be minimised or otherwise specified by the project arborist where within NRZ.





Appendix 7: Tree Protection Zone - Sign Example

**TREE
PROTECTION
ZONE**



NO ACCESS

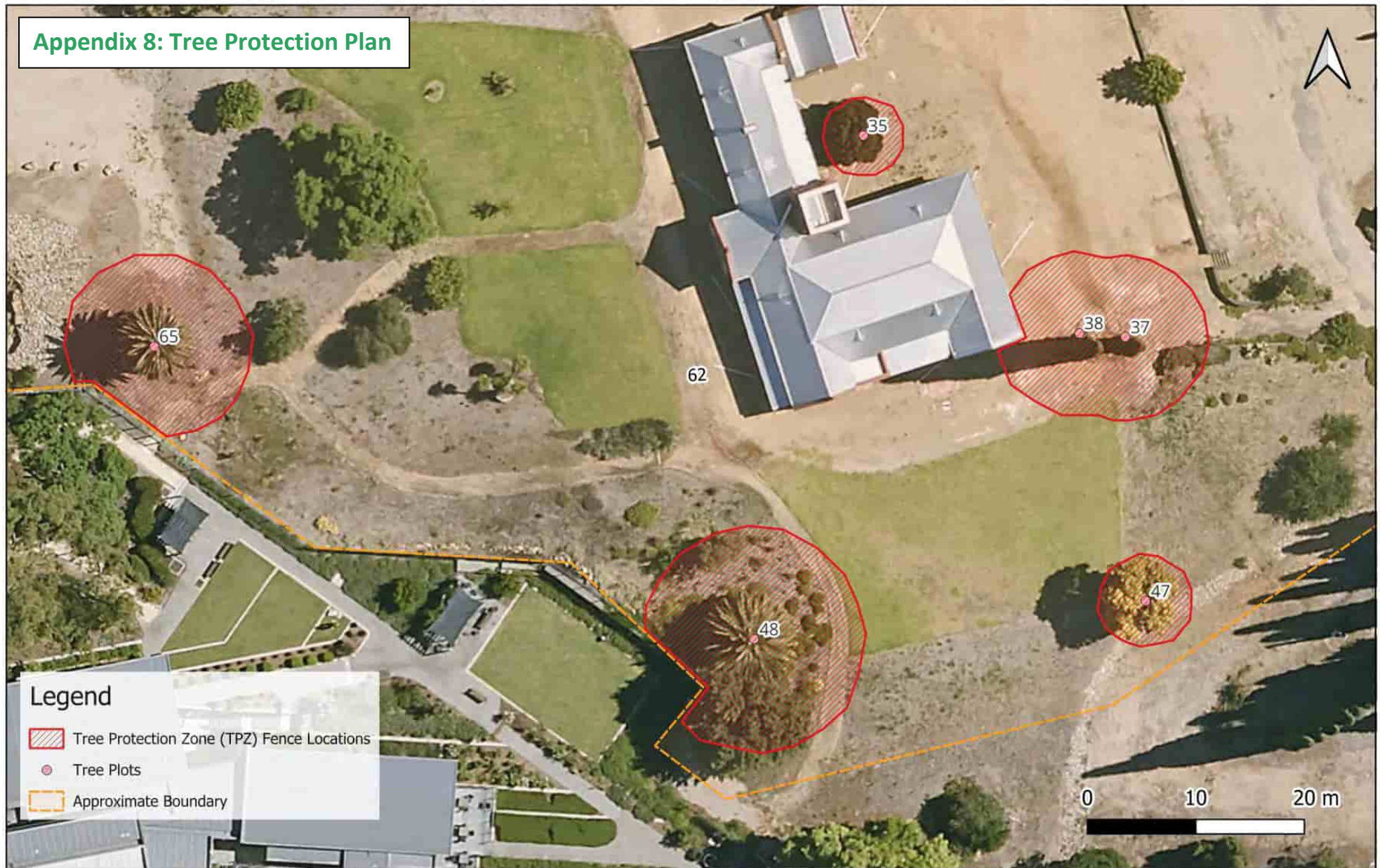
Activities excluded from the TPZ include —

- (a) Excavation or disturbance of the soil, including scraping of the surface**
- (b) Spreading or stockpiling of fill**
- (c) Cultivation**
- (d) Equipment and material storage**
- (e) Preparation of chemicals, including preparation of cement products**
- (f) Parking of vehicles and plant**
- (g) Refuelling**
- (h) Dumping of waste**
- (i) Wash down and cleaning of equipment**
- (j) Fires**
- (k) Physical damage to the tree**




Contact:

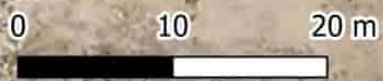
Contact Project Manager for copy of the Tree Protection Specifications (TPS).

Appendix 8: Tree Protection Plan



Legend

-  Tree Protection Zone (TPZ) Fence Locations
-  Tree Plots
-  Approximate Boundary



Tree Protection Plan
7 Spence Avenue, Myrtle Bank, South Australia,
5064

Plotted by: C. Pate
Date: 29/10/2025



Tree Protection Zone (TPZ) Fence Measurements	
Tree Number	TPZ Radius (m)
35	3.72
37	7.56
38	7.56
47	4.32
48	10.32
65	8.28

TPZ Fence Measurements