



Tree Consultants & Contractors
Tel (03) 9888 5214

16/April/21

VPA Projects Standing Advisory Committee
Planning Panels Victoria
Level 1
8 Nicholson Street
East Melbourne 3002

re: Craigieburn West PSP and Planning Scheme Amendment

The land owned by Peet Craigieburn Pty. Ltd. along the Mickleham Road frontage in Craigieburn West is proposed to be developed. The Craigieburn West Precinct Structure Plan (PSP) provides a scheme of development with preference for tree for retention. Peet proposes an alternative scheme of open space and tree retention in order to retain as many mature River Red Gums whilst facilitating a logical and practical development outcome.

HWL Ebsworth has requested me, Rob Galbraith of Galbraith and Associates, to:

- conduct an in depth review of the material supplied to me in relation to the Craigieburn West PSP and Amendment;
- consider and formulate my own opinions, within the limits of my expertise, with respect to the appropriateness of the Peet Master plan;
- respond to other submissions provided to the VPA, as relevant;
- conduct a site inspection, if necessary;
- prepare a report highlighting my opinions and conclusions. The report states the basis upon which I have arrived at my conclusions, including any analysis and facts I have relied upon or assumption which I have made which form part of the reasoning by which I reached my conclusions;
- and consider any other matter I deem appropriate.

The PSP applies to approximately 562 hectares of land generally bound by Mt Ridley Road to the north, the Craigieburn R2 PSP area to the east, the Greenvale North R1 PSP area to the south and Mickleham Road to the west. Peet owns a 62Ha parcel of land within the PSP area (Land).

The Place Based Plan (Plan 4 of the PSP) seeks to incorporate the retention of all trees that were identified as having ‘very high’ retention value and some trees that were identified as having ‘high’ retention value in the Arboricultural Assessment Report prepared by Treetec dated February 2019.

Requirement R33 of the PSP states:

“Vegetation shown on Plan 10 as Vegetation for Retention must be retained and incorporated into either the open space network or the public realm.”

Section 7 of the PSP Background Report Draft for Public Consultation (November 2020), outlines that there are 73 ‘very high’ and 420 ‘high’ rated trees scattered throughout the PSP. I am informed that the location of specific trees designated for retention presents practical delivery issues for the Land.

Peet has prepared a masterplan that provides for a slightly different tree retention regime within public space, relative to the draft PSP. The linear Local Park in the PSP has been formed to incorporate a high number of scattered trees and tree groups, as there is a concentration of high and very high value large mature River Red Gums in this zone. However this has caused a problematic separation between the park and the north-south connector road alignment within the Land.

The PSP also identifies ‘very high’ and ‘high’ retention trees that will not be able to be retained as they:

- are within the Craigieburn Road PAO area (northern boundary of Property 28 and Property 29);
- may have TPZs considerably within that the Craigieburn Road PAO area;
- are within the route of the proposed Gallantry Avenue.

The arboricultural consulting company Treetec provided a report for the whole of the PSP on behalf of the Victorian Planning Authority dated Feb 2019, after undertaking the field work in November - December 2018. In addition to the report by Treetec, an Arborist report commissioned by Peet was undertaken in November 2018 by Axiom Tree Management. The field work appears to have been undertaken approximately a month prior to that of Treetec.

As a result of the above, I visited the Land on both the 11/March/21 and the 13/April/21 and inspected a large sample of the mature River Red Gum trees, according to the tree numbering system by Treetec.

The concept plan on which I base my assumptions is the Version M drawing dated 03/02/21.

The Trees – General

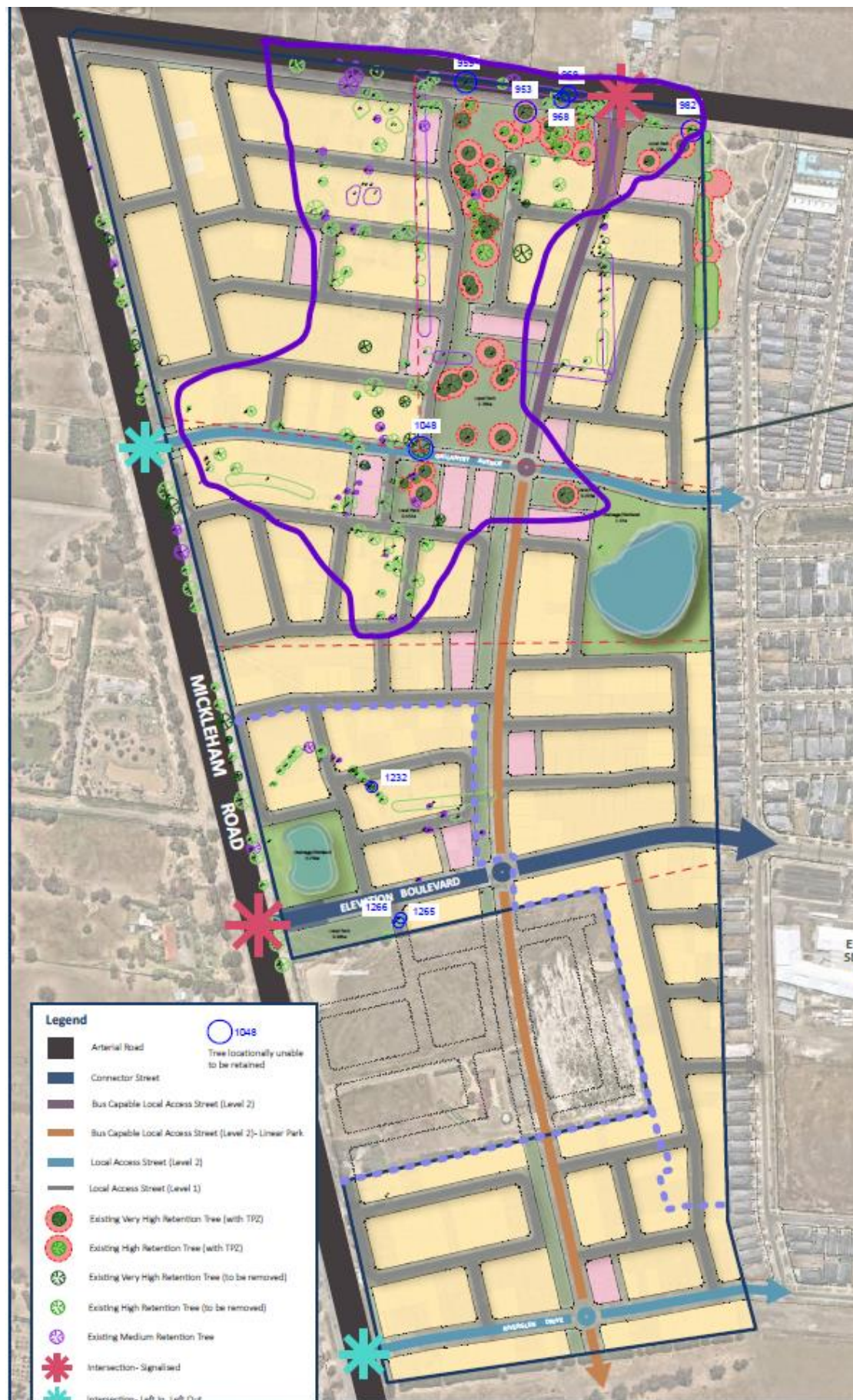
The great majority of the trees within the Land have been planted. They consist of Monterey Pines, poplars and cypresses in great number, along with commonly occurring eucalypts within the metropolitan area. Spotted and blue gums are common and indeed many River Red Gums have been planted around the dam and along the Mickleham Road frontage. Apart from some older cypresses and pines, it is of my opinion that none of these trees would exceed 50 years of age, and many would be substantially younger.

The other main group of trees are the naturally occurring mature self-sown River Red Gums. I have outlined their occurrence within the property in purple ink on the concept plan on page 4. There are some 130 in number. From annual increment analysis of several old stumps it is apparent that the dominant age group is approx. 230 - 250 years, noting that this type of age analysis can only be approximate due to the fact that River Red Gums can put on more than one growth increment in a year. There is also some guess work in determining how long the tree had been dead before cutting and when it was cut. There are trees in the site both older and younger than this estimate.

These River Red Gums are of high importance in the maintenance of bio-diversity. As is typical of the species when mature, they have developed a history of limb shed, and the remaining have high potential for further branch shed. The wounds left by the shed branches will often decay and become suitable as wild-life habitat over time.

Given the limb shed propensity, they need to be accorded large spaces free of housing encroachment so as not to threaten dwellings. Furthermore, where it is envisaged that there will be a significant increase in the incidence of people gathering near the trees, there is potential to considerably reduce the risk of major branch loss with selective branch removal and weight reduction pruning, along with the removal of major dead wood. Stubs ought be left intact.

Some 22 mature self-sown River Red Gums will have to be removed for the Craigieburn Road widening. Another 8 will have to go for Gallantry Avenue. It is noted that the trees to be retained are in large groups in a proposed L shaped lineal park as identified in the Peet Masterplan.



Very High Worth Trees According to Treetec within the Site

The trees within the Land listed as being of very high worth for retention in the Feb 2019 report by Treetec are numbers 915, 916, 917, 919, 921, 922, 923, 928, 930, 931, 932, 933, 936, 939, 952, 953, 957, 959, 968, 969, 983, 984, 996, 1033, 1035, 1036, 1037, 1038, 1039, 1041, 1044, 1045, 1046, 1048, 1049, 1062, 1127, 1131, 1134, 1140, 1142, 1148 and 1232, a total of 42 trees. Of these trees, they all have trunk diameters at breast height (DBH) of > 60cm and are River Red Gums, with the exceptions of tree 996 which is a relatively young planted Red Box not native to the area, 1062 a young small River Red Gum on a lean of 10m height and 1131 a young mature Swamp Yate native to Western Australia.

Of the above listed very high worth trees, Peet's Masterplan proposes to retain trees 915, 916, 917, 921, 922, 923, 928, 930, 931, 932, 933, 952, 953, 957, 983, 984, 1035, 1036, 1037, 1038, 1039, 1045, 1046, 1131, 1134, 1140 and 1142, a total of 27 trees. It is noted that trees 996 and 1062 are not being retained, although tree 1131 is shown to be retained. Thus 25 of the 39 of what have been noted by Treetec as the very high worth River Red Gums are being retained. Of these 25, 24 are naturally occurring self-sown River Red Gums.

High Worth Trees According to Treetec within the Site

The total number of trees within the Land listed by Treetec as being of high value, is 141 trees. These are as follows: 808, 822, 824, 835, 836, 838, 839, 840, 841, 853, 860, 861, 862, 863, 865, 868, 873, 874, 877, 878, 889, 892, 896, 897, 898, 899, 900, 903, 907, 910, 918, 920, 924, 925, 929, 933, 934, 935, 937, 938, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 954, 955, 956, 958, 959, 964, 965, 966, 967, 970, 971, 972, 973, 974, 975, 976, 979, 980, 981, 982, 991, 992, 997, 998, 999, 1001, 1002, 1007, 1013, 1015, 1017, 1022, 1024, 1026, 1034, 1040, 1042, 1043, 1050, 1053, 1054, 1055, 1056, 1059, 1061, 1088, 1095, 1100, 1101, 1104, 1109, 1115, 1116, 1126, 1129, 1130, 1132, 1137, 1145, 1149, 1150, 1151, 1154, 1159, 1160, 1161, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1205, 1211, 1214, 1215, 1216, 1217, 1223, 1227, 1228, 1229, 1230, 1234, 1235, 1236, 1242, 1265, 1266 and 1268.

Of the above trees rated as high worth by Treetec, many are of non-indigenous young planted eucalypts. Treetec does not name the species for many, so where they are stated to be unknown I have named them according to the Axiom report. So there are 6 Tasmanian or Victorian Blue gums (trees 889, 898, 899, 900, 903, 907), 5 Spotted Gums (trees 822, 824, 868, 1104, 1242), Sugar Gum (1088), a Prickly Paper Bark (1161), 3 Manna Gum (1211, 1265, 1266), a Euc. nicholii (892), 2 Red Box (991, 992), 6 Red Iron bark (997, 998, 1015, 1022, 1024, 1109), a Tuart (999), a Sydney Blue Gum (1001), 2 Pink Gum (1002, 1017), 2 Yellow Gum (910, 1007), Tallowwood (1013), E. crebra (1026), E. conferruminata (1160), 1 Monterey Cypress (1236), and 1 Wallangarra White Gum (1268). An additional 13 are young small River Red Gums and one (tree 951) is a dead tree of 69cm DBH supposedly of high habitat value.

Thus from a desk top study alone it seems odd that some 35 of these trees are rated as high, i.e. equivalent to healthy mature naturally occurring River Red Gums, yet they are young trees of commonly occurring species in the metropolitan area which are not natural to the Land. Another 13 are young planted River Red Gums or dead. All forty-eight, over a third of the supposedly high rated trees are readily replaceable with new

plantings in my opinion. 93 trees would appear to be high worth mature self-sown River Red Gums from this desk top study. However, given that from my site visit I counted only approximately 130 self-sown mature River Red Gums on the site, this imputed figure of 93 high worth mature self-sown River Red Gums plus 39 very high worth mature self-sown River Red Gums cannot be great, as some of these trees were rated as medium in the Treetec report.

Thus a significant proportion of the trees rated as high worth by Treetec is not really consistent with the aims of the PSP's stated objective of retaining and enhancing significant remnant native vegetation.

Of the listed high worth trees, 17 are proposed by Peet to be retained. These are numbers 918, 920, 924, 925, 929, 934, 935, 944, 945, 946, 949, 950, 951, 955, 956, 958 and 1137. Of these, all except tree 1137 is a mature naturally occurring River Red Gum with DBHs of > 60cm. With respect to tree 1137, it is a small young River Red Gum with a DBH of 33cm and 10m height.

Thus from a desk top study, 25 of the 39 very high worth mature self-sown River Red Gums plus 15 of the high worth healthy mature self-sown River Red Gums are being retained along with. Therefore 40 high and very high worth mature River Red Gums are proposed for retention on the Land, according to the desk top study.

Comparison of Treetec Data with the Axiom Report

In November 2018, Axiom Tree Management prepared an Arborist report for Peet assessing all of the trees on the Land. The field assessment appears to have been undertaken approximately a month prior to that of the Treetec assessment. In terms of the estimated retention value, each tree was listed in terms of high, medium or low, so the very high category as provided by Treetec is absent in the table of data by Axiom.

Comparison between the listed trees is not straightforward because the tree numbering system is entirely different. However in the appended excel table of data, we have set out all the 183 trees within the Land listed as being of very high or high value by Treetec. Along side of these we have listed the same trees, only referred to by a different number, as assessed by Axiom. Of the 183 trees, Axiom states that 132 are of high worth, 51 are of moderate worth, 1 is low to moderate and 7 are of low worth.

There is a substantial discrepancy between the Treetec report and Axiom report in terms of the retention values assigned to the trees. Some 32% of the trees rated as high or very high by Treetec are rated as moderate or less by Axiom. From my desk top analysis, either Treetec is substantially overrating the trees in terms of their retention value, or that Axiom is substantially underrating them, or the answer is somewhere in between.

Based on the high incidence of trees which look like they should be rated moderate at best, yet have been rated very high or high by Treetec, I undertook a sample field check.

Sample Field Check on the Treetec Data

During my field trip to the Land, I undertook a sample check of the Treetec data. I mainly confined myself to the area where the overwhelming majority of the naturally occurring mature River Red Gums are located (see extract of the Version M Concept plan on page 4). I assessed at least 50 trees, each of which was a mature River Red Gum, except for 1131. These were trees 861, 862, 877, 878, 915, 918, 919, 925, 928, 929, 930, 931, 932, 944, 945, 946, 950, 951, 953, 954, 955, 956, 957, 958, 970, 982, 983, 984, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1045, 1046, 1048, 1050, 1051, 1052, 1053, 1054, 1131, 1133, 1134, 1142, 1148 and 1149.

Of the above 50, which I have documented in the excel table of data of comparisons:

- Trees 930, 931 and 932 I would only rate as high, not very high, because of extensive branch and/or crown collapse and accentuated lopsidedness
- Tree 950 is in excellent condition and should be rated very high, as opposed to high
- Tree 983 should be rated high, not very high
- Tree 1039 should be rated high, not very high
- Tree 1053 should be rated moderate, not high
- Tree 1131 should be rated moderate, not very high
- Tree 1134 should be rated high, not very high – major branch failures

Of the sample of 50 trees, I disagree with 9 of the worth ratings. One of the trees should be rated higher, 8 lower. Thus if one was to extrapolate to all the mature River Red Gums rated as High or Very High by Treetec, i.e. (183-51) or 90 trees, one would expect $(90 \times 8/50) = 14$ of them would actually be rated lower. Two would be expected to be rated higher.

Tree 950 is being retained and should be in the very high category, thus in my opinion 26 of the very high worth trees are being retained, not 25. In addition Tree 1133 is noted in the Treetec report as medium however I would have thought it is of high worth. The tree can be retained, being just to the south-west of Tree 1134.

Thus from both a desk top study and field sampling, 16 high rated healthy mature self-sown River Red Gums are being retained along with 26 of the very high worth mature River Red Gums. Therefore 42 high and very high worth mature River Red Gums are proposed for retention on the Land.

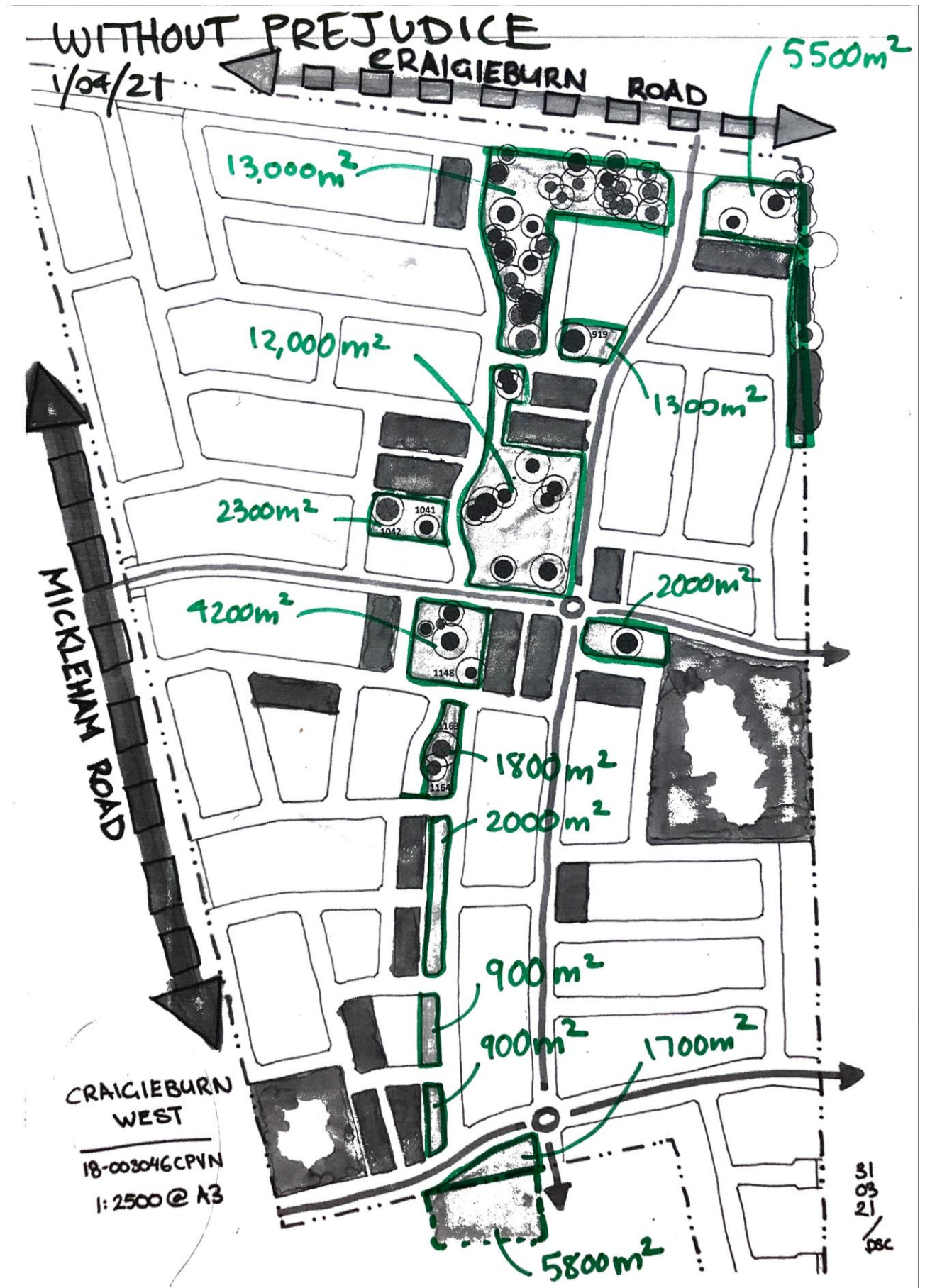
Overall in my opinion there is a bias in the Treetec report to rating the trees higher than what they should be, given factors such as species (the primary reason), size, condition, habitat value, whether indigenous or not, useful life expectancy and the bio-diversity objective. However with respect to the worth ratings of the mature self-sown River Red Gums, there appears to be general conformity between reports in terms of the allocated retention values, although some bias to suggesting higher worth trees by Treetec.

Summary

The Land has approximately 130 mature self-sown River Red Gums. Some 30 of these trees alone will have to be removed to allow for the widening of Craigieburn Road and the construction of Gallantry Avenue. It is apparent that 26 of the 40 very high worth mature self-sown River Red Gums are being retained along with 16 high worth. The number of trees rated as high worth for retention in the survey upon which the PSP is based would have to be considered as overrated in my opinion, given the high proportion of planted trees of non-indigenous commonly occurring trees in the metro area included among them. In terms of the trees listed by Treetec as being of very high worth for retention, I would suggest that several should be rated as medium.

Current Negotiations with Council

I have been requested by HWL Ebsworth to comment on the concept plan on page 9 which I am informed has been presented to Council as part of current negotiations. It allows for the retention of trees 919, 1042, 1043, 1148, 1163 and 1164. The Version M concept plan did not allow for the retention of these trees. Furthermore tree 1133 which in my opinion should be rated highly in terms of its worth for retention, can be retained on this plan, although it could be retained under the Version M plan. Thus an extra two very high worth and four high worth trees can be retained under this layout. This is obviously a significant improvement in the retention of high value remnant type River Red Gums and goes further towards achieving the PSP's objectives in relation to quality mature River Red Gum retention.





944

945

951

970



862



954



936

935

934

933



923

924

925



1137



1134



1133



1148

1149



1166

1167

1163

1164

The following pages set out details of my qualifications and experience:

1. Name and Professional Address of Expert

Robert Cameron Galbraith
Arboriculturist
40 Glyndon Road
Camberwell Vic 3124
Tel: 9888 5214 Fax: 9888 5063

2. Qualifications and Experience

1977 Attained Degree in Forest Science from Melbourne University

1978-81 Forest inventory work and road locating in Gippsland, Tasmania and Northern Territory

1982 Foreman of a contract re-vegetation crew at various MMBW parks

1982-83 Attained the National Certificate of Horticulture in Arboriculture at Merrist Wood College, England, with Distinctions

1983-85 Foreman of a large Melbourne tree surgery company

1986-88 Tree surgery sub-contractor

1988-90 Manager of the Arboricultural Services Division of Rivett Enterprises.
Arboricultural Consultant for Rivett Enterprises.

1991- Principal, Galbraith & Associates - Arboricultural Consultants and Contractors.

Consultants to Royal Botanic Gardens Sydney, Major Projects Victoria, St Kilda Botanic Gardens, Melbourne Parks & Waterways, Vic Urban, Office of Housing Department of Human Services, legal firms, insurance companies, developers, town planning consultants, architects, landscape architects, local government (Cities of Albury, Bayside, Boroondara, Manningham, Moreland, Stonnington, Whitehorse). Contracting in arboricultural services for private, government and commercial clients.

VOLUNTARY ARBORICULTURAL INDUSTRY WORKS

Arboricultural Association of Australia (President, 1994, 95, 96)
Major contributor to the Australian Standard AS4373-1996 Pruning of Amenity Trees.

3. Area of Expertise

My area of expertise is in amenity tree management.

4. Expertise to Prepare this Report

My expertise is based on substantial experience in forestry and arboriculture, with many years directly working with thousands of different trees in differing situations. The tasks of climbing, dismantling, pruning and excavating near

trees, particularly in Melbourne, is or has been, virtually a daily routine over many years. I keep well abreast of important and relevant research in arboriculture, reading widely and conferring regularly with colleagues in the arboricultural field.

5. Instructions Received in Relation to this Matter

I have received instructions from HWL Ebsworth. They have been to:

- conduct an in depth review of the material supplied to me in relation to the Craigieburn West PSP and Amendment;
- consider and formulate my own opinions, within the limits of my expertise, with respect to the appropriateness of the Peet Master plan;
- respond to other submissions provided to the VPA, as relevant;
- conduct a site inspection, if necessary;
- prepare a report highlighting my opinions and conclusions. The report should clearly state the basis upon which you have arrived at my conclusions, including any analysis and facts I have relied upon or assumption which I have made which form part of the reasoning by which I reach my conclusions; and consider any other matter you deem appropriate.

6. Facts/Matters/Assumptions/Reference Documents used to prepare this Report

The Version M Concept Plan by Peet dated 03/02/21.

The Arborist Report dated November 2018 by Axiom Tree Management

The Arborist Report by Treetec dated February 2019

Australian Standard 4970:2009 'Protection of trees on development sites'

7. Other Persons Relied Upon

Nil

8. Summary of my Opinions

The Land has approximately 130 mature self-sown River Red Gums. Some 30 of these trees alone will have to be removed to allow for the widening of Craigieburn Road and the construction of Gallantry Avenue. It is apparent that 26 of the 40 very high worth mature self-sown River Red Gums are being retained along with 16 high worth. The number of trees rated as high worth for retention in the survey upon which the PSP is based would have to be considered as overrated in my opinion, given the high proportion of planted trees of non-indigenous commonly occurring trees in the metro area included among them. In terms of the trees listed by Treetec as being of very high worth for retention, I would suggest that several should be rated as medium.

9. Relationship with Permit Applicant

I have no relationship with the permit applicant other than a financial agreement to prepare this evidence statement.