7.1.4 78 GLEN TOWER DRIVE GLEN WAVERLEY - TPA/55943 - REMOVAL OF TWO (2) TREES

Responsible Manager:	Catherine Sherwin, Manager City Planning
Responsible Director:	Peter Panagakos, Director City Development

EXECUTIVE SUMMARY

This application proposes the removal of two (2) trees.

The application was exempt from public notification.

Key issues to be considered relate to the trees and their contribution to the landscape character of the surrounding area, their health and whether other remedial maintenance options are available that would allow for tree retention.

This report assesses the proposal against the provisions of the Monash Planning Scheme including the relevant policy from the planning policy framework.

The reason for presenting this report to Council is because officers do not support the removal of the two (2) trees proposed for removal.

The proposed removal of two (2) trees is inconsistent with the relevant provisions of the Monash Planning Scheme and it is recommended that the application be refused.

RESPONSIBLE DIRECTOR:	Sean McNamee, Acting Director City Development
RESPONSIBLE MANAGER:	Catherine Sherwin
RESPONSIBLE PLANNER:	Jack Gleeson
WARD:	Glen Waverley
PROPERTY ADDRESS:	78 Glen Tower Drive, Glen Waverley
NUMBER OF OBJECTIONS:	N/A
ZONING:	Clause 32.09 – Neighbourhood Residential Zone (Schedule 4)
OVERLAY:	Clause 42.02 – Vegetation Protection Overlay (Schedule 1)
EXISTING LAND USE:	Single dwelling
RELEVANT POLICY:	Municipal Planning Strategy
	Clause 02.01 – Context
	Clause 02.02 - Vision

	 Clause 02.03 – Strategic Directions Clause 02.03-4 – Built Environment and Heritage Clause 02.04 – Strategic Framework Plans
	Planning Policy Framework
	 Clause 15 – Built Environment and Heritage Clause 15.01-1L-02 – Tree Conservation for a Garden City Clause 15.01-5S – Neighbourhood Character Clause 15.01-5L – Monash Preferred Neighbourhood Character
STATUTORY (60 DAY) PROCESSING DATE:	22 July 2024
DEVELOPMENT COST:	Nil

LOCALITY PLAN



NEIGHBOURHOOD PLAN



RECOMMENDATION

That Council resolves to issue a Notice of Decision to Refuse to Grant a Planning Permit TPA/55943 for the removal of two trees on land affected by the Vegetation Protection Overlay at 78 Glen Tower Drive, Glen Waverley subject to the following grounds:

- 1. There is inadequate justification for the removal of the trees regarding the statement of significance, the objective, and the decision guidelines of Clause 42.02 (Vegetation Protection Overlay).
- 2. The trees make a significant contribution to both the streetscape and the tree canopy of the municipality, and their removal would be contrary to both strategies and policy guidelines in Clause 15.01-1L-02 (Tree Conservation for a Garden City).
- 3. The proposed tree removals do not accord with the relevant purposes of Clause 42.02 (Vegetation Protection Overlay), as it does not preserve the existing trees and contradicts Clause 15.01-1L-02 (Tree Conservation for a Garden City).

COUNCIL PLAN STRATEGIC OBJECTIVES

Sustainable City

Ensure an economically, socially, and environmentally sustainable municipality. Investigate and progress planning rules for tree and vegetation controls.

BACKGROUND

<u>History</u>

There is no previous relevant planning history for this site.

Site and Surrounds

The subject land is located on the eastern side of Glen Tower Drive in Glen Waverley and is approximately 225 metres south of High Street Road, Glen Waverley.

The subject site is irregular in shape. It has a frontage of 19.812 metres, and a maximum side depth of 35.7886, resulting in an area of approximately 709.04 square metres.

The land is occupied by a double storey rendered dwelling.

An aerial photograph of the subject site and surrounding land can be found attached to this report (Attachment 1).

PROPOSAL

The application proposes the removal of two (2) trees from the subject site.

The trees proposed to be removed are as follows:

Tree 1: Eucalyptus nicholii (Narrow leaved black peppermint)

- Location: south-west corner, within the front setback of the site.
- Height: 14.8 metres / DBH: 79cm.
- The Arborist Report supplied by the Permit applicant has described the tree as having fair/poor health and fair/poor structure, a useful life expectancy of 10-20 years and moderate retention value.

Tree 2: Eucalyptus nicholii (Narrow leaved black peppermint)

- Location: north-west corner, within the front setback of the site.
- Height: 14.8 metres / DBH: 79cm
- The Arborist Report supplied by the Permit applicant has described the tree as having fair health, fair structure, a useful life expectancy of 20+ years and a moderate retention value.

The report also describes a third tree 'Tree 3' - (*Eucalyptus cinerea* – Argyle Apple); however, it does not meet the permit trigger requirements and is exempt from requiring a planning permit for removal due to its height.

In their submission, the applicant provided reasons as to why they wanted to remove the subject trees, being concerns regarding damage to the existing dwelling, driveway and fence.



Excerpt of the Site Plan from the Submitted Arborist Report.



Photograph of subject trees, 1 July 2024.

Attachment 2 and 3 includes plans and the Arborist Report forming part of the application.

PERMIT TRIGGERS

Zoning

The subject site is located within the Neighbourhood Residential Zone (Schedule 4).

The zoning controls offer no applicable planning permit trigger.

<u>Overlay</u>

The subject site is on land affected by the Vegetation Protection Overlay (Schedule 1).

Pursuant to Clause 42.02-2 of the Monash Planning Scheme, a permit is required to remove or destroy any vegetation that:

- Has a trunk circumference greater than 500 millimetres (160 millimetres diameter) at 1200 millimetres above ground level and
- Is higher than 10 metres.

Attachment 4 details the zoning and overlays applicable to the subject site and surrounding land.

CONSULTATION

Further information was requested on 20 May 2024. The permit applicant responded on 23 May 2024 by providing the requested information.

The Applicant was advised that this application was coming to the July Council meeting, and a letter was sent with the details of the meeting.

The Applicant has been advised that this application is recommended for refusal, and an outline of the grounds has been explained.

Public Notice

Pursuant to Clause 3 of Schedule 1 to Clause 42.02 (Vegetation Protection Overlay), an application to remove or destroy any vegetation is exempt from the notice requirements of Section 52(1)(a), (b) and (d) of the Planning and Environment Act.

As such, the application was not advertised.

Referrals

No external referral authorities required notification for this application.

Internal discussions were held with the Horticulture Department regarding the proposed removal of the two trees. They were in agreement that there was inadequate justification for their removal.

RELEVANT PLANNING POLICY

Purpose and Vision

Clause 02.03-4 gives guidance on the municipality's desired garden city character. High canopy trees are considered a dominant feature of the municipality. The maintenance and enhancement of the tree canopy is a priority for Council and the community. Moreover, extensive landscaping and vegetation contribute positively to the garden city character of the municipality. The loss of significant vegetation and tree canopy is outlined in this Clause as a concerning factor that erodes the garden city character of the municipality.

Planning Policy Framework

Clause 15.01-1L-02 – Tree Conservation for a Garden City

Clause 15.01-1L-02 builds upon the guidance provided in Clause 02.03-4 and outlines strategies that aim to prevent the erosion of canopy cover and the garden city character of the municipality.

The relevant strategies of Clause 15.01-1L-02 are:

• *Retain existing semi-mature and mature canopy trees, wherever possible, to maintain the existing tree canopy.*

• Incorporate landscaping that reinforces the garden city character in all development, including by planting semi-mature canopy trees with spreading crowns in open space areas, along boundaries adjacent to neighbouring open space and in front setbacks.

Clause 15.01-5L – Monash Preferred Neighbourhood Character

Clause 15.01-5L outlines the preferred neighbourhood character areas for the municipality. The subject site is located within the 'Dandenong Valley Escarpment' preferred character area.

The relevant general strategies of Clause 15.01-5L are:

- Retain and plant canopy trees, in front and rear setbacks to soften the appearance of the built form from surrounding properties and any creek environments and contribute to the landscape character of the area.
- Site buildings to minimise the need to remove significant trees and protect significant trees on the site and adjoining properties.

The relevant Dandenong Valley Escarpment strategies of Clause 15.01-5L are:

- Provide and protect native trees in both the public and private realm to:
 - Provide an overhead canopy.
 - Unify the diverse built-form.
 - Maintain the relationship with the semi-natural landscape of the Dandenong Valley.
- Provide generous front setbacks with significant native trees and understorey vegetation.
- Plant native vegetation to contribute to the existing natural setting.

Vegetation Protection Overlay

The relevant purposes of the Vegetation Protection Overlay are:

- To protect areas of significant vegetation
- To preserve existing trees and other vegetation.
- To recognise vegetation protection areas as locations of special significance, natural beauty, interest and importance.
- To encourage regeneration of native vegetation.

The Vegetation Protection Overlay provides the following relevant decision guidelines:

- The Municipal Planning Strategy and the Planning Policy Framework.
- The state of nature and significance of the vegetation to be protected and the vegetation protection objective contained in a schedule to this overlay.
- The role of native vegetation in conserving flora and fauna.

- Whether provision is made or to be made to establish and maintain vegetation elsewhere on the land.
- Any other matters specified in a schedule to this overlay.

Schedule 1 Vegetation Protection Overlay provides the following relevant decision guidelines:

- The reason for removing or destroying the vegetation and the practicality of alternative options which do not require removal or destruction of vegetation.
- The practicality and benefits of relocating significant vegetation.
- The condition and quality of the vegetation.

Monash Urban Landscape and Canopy Vegetation Strategy 2018

The Monash Urban Landscape and Canopy Vegetation Strategy was adopted by Council at its 20 October 2018 meeting. The subject site is located within the 'Tall Eucalypt' preferred vegetation character type area as outlined in the 'Monash Urban Landscape and Canopy Vegetation Strategy 2018'. In this area, native eucalyptus trees are the desired type of vegetation for the area, whereby future and replacement planting of this type is encouraged.

ASSESSMENT

Consistency with the Municipal Planning Strategy and the Planning Policy Framework

The proposed tree removals are not in accordance with Clause 02.03-4 (Built Environment and Heritage – Strategic Directions), as it will result in the removal of two canopy trees which are actively contributing to the Garden City Character of the municipality. The removal of the subject trees would result in the erosion of the Garden City Character of the municipality, which would directly contradict this strategic direction. Moreover, the proposed tree removals are not in accordance with Clause 15.01.1L-02 (Tree Conservation for a Garden City) as strategies within this clause aim for the retention of mature canopy trees, and specifically discourages the removal of trees over 10 metres. Lastly, the proposed tree removals are not in accordance with Clause 15.01-5L (Monash Preferred Neighbourhood Character) as the Dandenong Valley Escarpment character area strategies specifically call for the retention of native trees in the private realm to provide an overhead canopy, unify the diverse built-form and maintain the relationship with the semi-natural landscape of the Dandenong Valley.

Vegetation Protection Overlay

The Vegetation Protection Overlay (VPO) provides a clear objective and decision guidelines for the removal and protection of significant vegetation, to preserve existing trees and enhance the character of neighbourhoods.

The proposed tree removals do not accord with the statement of significance and the objectives contained within Schedule 1 to the VPO. The significance statement places emphasis on retaining on-site canopy trees that contribute to the Garden City Character of Monash. The site inspection conducted by the planning officer revealed that the subject trees are located within the front setback and are prominent in the streetscape. The height and extensive canopy of the trees are prominently displayed when viewed from the street (see above photograph). The subject trees are

actively contributing to the Garden City Character of the municipality, and their removal would contradict the statement of significance.

The trees are native trees, and their removal would impact conserving flora and fauna at the nearby Bushy Park Wetlands Conservation Reserve. As the trees are mature, are in mostly fair health and structure, and have a ULE of at least 10 to 20 years, they should be able to contribute to conserving flora and fauna in the area for years to come. Additionally, it is considered that any proposed replacement planting would take many years to match the existing benefits the subject trees provide in terms of conserving flora and fauna of the area. In order to protect the native vegetation in this area, the proposed removals are considered to be inappropriate.

In the applicant's submission, they outlined their willingness to conduct replacement planting of unspecified Eucalyptus trees in the same position as the trees proposed to be removed. In this instance, replacement planting is not considered appropriate, as it would take many years to grow to an adequate height that would make a significant contribution to the municipality's streetscape. As discussed above, the trees are prominently visible in the streetscape and contribute to the municipality's tree canopy. As such, removing the subject trees and planting with replacement trees is considered inappropriate.

In their submission, the applicant raised concerns regarding damage to the existing dwelling, driveway and fence due to the trees. Noting that the arborist report mentions cracks in the render of the front fence but not the dwelling. Despite this observation no evidence was provided to link the cracking of render on the fence to the trees. It is also noted that seasonal soil movement is likely to crack render, particularly in basic structures such as low brick fences.

Whilst concerns regarding potential damage to the existing dwelling and associated features are empathised with, it is noted that subject trees have not historically been maintained in accordance with Australian pruning Standards as outlined in the supplied Arborist Report. Concerns regarding any damage from falling branches can be mitigated through regular pruning and maintenance of the subject trees. The subject trees existed before the establishment of the current dwelling that is situated on the subject site and appropriate measures should have been taken at this time to ensure trees that are protected by the VPO would not experience detriment resulting from redevelopment such as root barriers, which can still be installed. The retention of the native subject trees is considered to be more significant in the context of maintaining the Garden City Character of the municipality. Consideration should be given to alternative measures to ensure the trees are retained.

As outlined in the supplied Arborist Report, the health and structure of Tree 1 is nominated as 'Fair/Poor' and the health and structure of Tree 2 is nominated as 'Fair'. Fair in health is defined as 'The tree is in reasonable condition and growing well for the species. The tree may exhibit an adequate canopy of foliage. There may be some dead wood in the crown, some grazing by insect or animals may be evident, and/or foliage colour, size or density may be atypical for a healthy specimen of that species'. Fair in structure is defined as 'The tree has some minor problems in the

structure of the crown. The crown may be slightly out of balance at some branch unions or branches may be exhibiting minor structural faults. If the tree has a single trunk, this may be on a slight lean or be exhibiting minor defects. Probably of significant failure is low'. Poor in health is defined as 'The tree is not growing to its full capacity. Extension growth of the laterals may be minimal. The canopy may be thinning or sparse. Large amounts of dead wood may be evident throughout the crown, as well as significant pest and disease problems. Other symptoms of stress indicating the tree decline may be present'. Poor in structure is defined as 'The tree may have a poorly structured crown, the crown may be unbalanced, or exhibit large gaps. Major limbs may not be well defined; branches may be rubbing or crossing over. Branch unions may be poor of faulty at the point of attachment. The tree may have suffered major root damage. Probability of significant failure is moderate'.

Whilst it is apparent from the above definitions that both trees have some elements of defects, the presence of defects itself does not justify the removal of the trees. The Arborist report suggests that all trees would benefit by remedial action of weight reduction and crown-cleaning pruning and only recommends removal based upon the potential for minor damage, rather than health or structural concerns. Removal of the subject trees based upon minor defects would be inappropriate as Tree 1 has a ULE of 10-20 years and Tree 2 has a ULE of 20+ years. It is instead suggested that the trees are actively managed and monitored to ensure their viability into the future. Should the trees ULE change in the future then a new tree removal application can be lodged and considered.

FINANCIAL IMPLICATIONS

There are no financial implications to this report.

POLICY IMPLICATIONS

There are no policy implications to this report.

CONSULTATION

Community consultation was not required.

SOCIAL IMPLICATIONS

There are no social implications to this report.

HUMAN RIGHTS CONSIDERATIONS

There are no human rights implications to this report.

GENDER IMPACT ASSESSMENT

A GIA was not completed because this agenda item is not a 'policy', 'program' or 'service'.

CONFLICT OF INTEREST

No officers involved in the preparation of this report have any direct or indirect conflict of interest in this matter.

CONCLUSION

Overall, it is considered that the removal of the subject trees would be inappropriate as it does not satisfy the relevant provisions, policies, and decision guidelines of Clause 02 (Municipal Planning Strategy), Clause 15.01-1L-02 (Tree Conservation for a Garden City), Schedule 1 to Clause 42.02 (Vegetation Protection Overlay) and Clause 42.02, which aim to retain existing mature canopy trees that reinforce the Garden City Character of the municipality. As such, there is insufficient justification provided by the applicant for the proposed removals.

It is recommended that the application be refused.

ATTACHMENT LIST

- 1. Aerial Photograph 78 Glen Tower Dve [7.1.4.1 1 page]
- 2. Proposed Development Plan 78 Glen Tower Dve [7.1.4.2 1 page]
- 3. Arborist Report 78 Glen Tower Dve [7.1.4.3 24 pages]
- 4. Zonings and Overlays Map 78 Glen Tower Dve [7.1.4.4 1 page]



10 Site map



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ARBORICULTURAL RISK ASSESSMENT REPORT

REPORT COMMISSIONED BY: Candy Zhao

SUBJECT SITE: 78 Glen Tower Drive, Glen Waverley Vic 3150

REPORT PREPARED BY: Siegfried Tuenker, Consulting Arborist DATE OF ASSESSMENT: Monday, March 25, 2024

DATE OF REPORT: Thursday, April 04, 2024

VERSION 1

Graduate Certificate Arboriculture (AQF 8)

MELBOURNE TREE COMPANY						
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1 Assignment

1.1 Author/Consulting Arborist

Name Siegfried Tuenker, Consulting Arborist Grad. Cert. Arboriculture (AQF 8) Company Melbourne Tree Company Phone 1300 192 599 Email melbournetreecompany@gmail.com

1.2 Client

Name Candy Zhao

Site Address

78 Glen Tower Drive, Glen Waverley Vic 3150

1.3 Brief

The purpose of this report is to assess three Eucalypts (*Eucalyptus sp.*), which are located within the front yard of the subject site (78 Glen Tower Drive). Detail has been requested in relation to the following instructions:

- To provide an objective assessment of the trees in their current state.
- To provide an objective assessment of the retention value of the subject trees.
- To determine the trees' retention suitability.
- To determine the trees' risk rating.
- To determine if the trees have the potential to cause damage to the subject site dwelling, driveway or underground services.
- To provide recommendations in order to reduce the trees' risk rating to an acceptable level.

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2 Data collection

2.1 Site Visit

• Siegfried Tuenker, of Melbourne Tree Company, visited the site for an arboricultural assessment on Monday the 25th of March 2024 at 9:00am.

2.2 Method of data collection

- The subject trees were assessed from observations made as viewed from ground level within 78 Glen Tower Drive.
- The subject trees have been assessed using the Quantified Tree Risk Assessment (QTRA) model (Refer to Section 11).
- Field notes were documented, the summary of observations is an accurate account of notes gathered whilst in the field.
- The heights of the trees were measured by using a Nikon Forestry Pro 2 Laser Range Finder.
- The spread of each canopy was estimated.
- A digital camera was used at ground level to gather photographic evidence.
- A circumference tape measure was used to determine the trunk dimensions of the subject trees.

3 Site description

- The subject site is located in a Neighbourhood Residential Zone Schedule 4 (NRZ4) within the Monash Council.
- The subject site is located in a Significant Landscape Overlay Schedule 9 (SLO9) within the Monash Council.
- The subject trees are located within the front yard of 78 Glen Tower Drive.
- The terrain of site where the trees are located appeared to decline northwards.
- No additional vegetation was assessed upon request.

4 Permit requirement

4.1 Vegetation Protection Overlay – Schedule 1 (VPO1)

A permit is required to remove or destroy any vegetation that:

- has a trunk circumference greater than 500mm (160mm diameter) at 1200mm above ground level and
- o is higher than 10 metres

This does not apply to dead vegetation or to the following species:

- \circ all willow trees
- o radiata or monterey pines
- \circ evergreen alders
- sweet pittosporums
- o desert ashes

An application to remove or destroy vegetation must be accompanied by the following information:

- A plan showing the location of the vegetation to be removed or destroyed.
- \circ The type and quality of the vegetation to be removed or destroyed.
- \circ $\,$ The justification for the proposed removal or destruction.
- o A statement of alternatives examined to removal or destruction.

An application to remove or destroy vegetation in conjunction with development of the land must be accompanied by a site analysis plan and a written statement demonstrating how the removal or destruction of the vegetation is essential for the proposed development to proceed, including an assessment of alternative design solutions retaining the vegetation.

Note: A permit is required to remove or destroy Trees 1 and 2.

Tree 3 is under the height trigger of VPO1 and hence not protected.

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5 Tree data

Tree No.	Botanical Name & Common Name	Age	Origin	Height	Canopy Spread	DBH CA1 DAB	Health	Structure	ULE (years)	Amenity Value	Retention Value	TPZ Radius	SRZ Radius	Permit Required	Comments								
	Eucalyptus nicholii Mature			N-S	0.79 m									Situated in recently constructed (<10 years) front garden bed with rendered front fence circumnavigating the base and located within 10cm of the trunk. Moderate tip dieback and leaf loss throughout outer crown. Moderate reaction wood growth on trunk and below first-order union at 3.1m above									
1		Mature Native NSW QLD	Native NSW QLD	Native NSW QLD	9 14.8 m	14.0 m	2.48 m	Fair/ poor	Fair/ poor	10- 20	10- 20 Moderate	derate Moderate	tte 9.5 m	0.5 3.2 m m	2 Yes n (VPO1)	ground level; bark splitting at this location, unclear if extends into sapwood. Canopy weighted to the south and east Minor deadwood up to 10cm diameter and historical failures up to ~12cm diameter typical for a tree of this size. Unusual scarin bole at 2m above ground level with significant reaction wood suggestive of historical split of delamination; similar scar							
	Narrow-leaved black peppermint				E-W 13.0 m	0.92 m									and two first-order limbs over road moderately over- extended. Historic pruning does not meet AS4373 – 2007. Sporadic areas of chlorotic and necrotic foliage suggest fair/poor underlying vigour. Small cracks in garden wall render do not appear to be structural.								
	Fucalvotus	calyptus nicholii Mature NSt				Native Mature NSW QLD	Native NSW QLD						N-S	0.70 m									Recent structural acclimitisation on trunk and first-order stams. Tip diaback where compating with Tree 3. Minor
2	nicholii Mature		Mature I	Mature	Mature			11.5 m	11.0 m	2.26 m	Fair F	Fair	20+	Moderate	ate Moderate	e 8.4 m	3.4 3.1 m m	1 Yes (VPO1)	deadwood throughout up to 10cm diameter. Underlying vigour appears fair/good. Base situated 0.8m from driveway which is 0.2m below grade of the garden bed in which the tree				
	Narrow-leaved black peppermint				E-W 11.0 m	0.85 m									is located. Historic pruning does not meet AS4373 – 2007. Tree is 8.3m away from the garage wall.								
	Eucalyptus cinerea Matu	Mature	Mature	Mature								N-S	0.48 m									Base hard on boundary paling fence. Canopy weighted to the east. Outer tips somewhat sparse. Season tip growth appears good in majority of crown. Some areas of sparse foliage likely	
3					NSW VIC	9.8 m	8.0 m	1.48 m	Fair/ good	Fair	20+	Moderate	Moderate	5.8 m	2.6 m	No	associated with browsing by possums. Base situated 0.65m from driveway which is 0.2m below grade of the garden bed in which the tree is located 1 imb over fence line has been						
	Argyle Apple				E-W 8.0 m	0.54 m									lopped. Historic pruning does not meet AS4373 – 2007. Situated 2.6m from garage wall.								

6 Photographic evidence



Tree 1 as viewed from west



Tree 1 base



Moderate deadwood



Splitting bark and wound



Unusual reaction wood and bark split beneath union

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Tree 2 as viewed from west



Dieback in eastern side of canopy



Neighbouring garden bed within the SRZ



Tree 2 base and constrained garden bed



Crown structure

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Tree 3 as viewed from south



Tree 3 base



Large limb lopped over fence line



Base hard on boundary fence



Proximity to neighbouring dwelling

7 Observations

7.1 Tree 1

7.1.1 Health

Tree 1 is considered to be of fair/poor health, as it presented with a somewhat sparse canopy mass and several areas of foliage and tip dieback. Foliage turgor was generally fair, and did not exhibit active pests or diseases. The tree exhibited moderately vigorous and recent reaction wood growth. A moderate amount of deadwood was located throughout the canopy and is fairly typical for a mature tree of this species.

7.1.2 Structure

Tree 1 is comprised of a single trunk which bifurcates into several first-order stems at heights of 2-7m above ground level in a branching pattern typical for the species. The tree has a slight westward lean, and the two lowest limbs are moderately over-extended above the carriageway.

Two unusual longitudinal wounds on the trunk exhibit recent and vigorous reaction wood growth; one is positioned on the tension side of the trunk, and one offset below the compression side of a first-order union; that both exhibit vigorous recent wood growth suggest they affect the structural integrity of the tree. Other first- and second-order unions appeared satisfactory.

Two limbs, including the limb with the unusual wound and reaction wood, are moderately over-extended and are growing over the Glen Tower Drive carriageway. They are suitably elevated to avoid vehicle impact.

Deadwood up to 10cm diameter is distributed rather evenly throughout the canopy, with several branches situated above the council footpath. Whilst these can develop normally as a result of 'natural pruning' where the tree jettisons unproductive laterals, by their nature, they are prone to unpredictable failure.

A rendered front garden wall has been constructed around the base of this tree in late 2017; whilst the construction method is unknown, it typically takes several years for deleterious impacts from development to be observed in larger trees. Given this tree is showing signs of stress and decline in 2024, it can be reasonably surmised that the construction of the wall is likely to have caused some direct (i.e. root severance) or indirect (i.e. soil compaction) damage to the tree. Given the proximity of the wall to the base, it is possible that roots within the Zone of Rapid Taper (ZRT) have been damaged, which can have serious implications for the stability of this tree.

7.2 Tree 2

7.2.1 Health

Tree 2 is considered to be of fair health, as it presented with a slightly sparse canopy mass and minor areas of foliage and tip dieback concentrated where the canopy competes with nearby Tree 3. Foliage turgor was generally fair/good and did not exhibit active pests or diseases. The tree exhibited moderately vigorous but minor reaction wood growth. A moderate amount of deadwood was located throughout the canopy and is typical for a mature tree of this species.

7.2.2 Structure

Tree 2 is comprised of a single trunk which bifurcates into several first-order stems at heights of 2 - 4m above ground level in a branching pattern typical for the species. The tree is somewhat lopsided to the north-west and has some mature epicormic stems where historically pruned at 2-3m above ground level.

The tree is situated 8.3m from the garage wall, which did not exhibit any signs of damage. No damage to the nearby driveway or garden bed edging were observed. The nearby gate could not be closed properly because as a result of the root system.

First- and second-order unions generally appeared good and did not exhibit significant reaction wood growth, suggesting the tree is well adapted to the prevailing environmental conditions of the site. Where the trunk splits into 4 large stems at 4m above ground level there was minor structural acclimatisation and some of the unions were somewhat narrow; these should be monitored for signs of inclusion or unusual reaction wood growth.

This tree is situated in a small garden bed and a concrete driveway constructed in early 2018 is situated 0.8m south of the base of this tree, and 0.2m below grade of the garden bed. It is unknown what accommodations were made during construction, but provided the driveway was constructed sympathetically and ground protection used during construction to minimise soil compaction, the tree would likely have had the capacity to tolerate construction, and this is reflected in the fair health observed during inspection.

Of concern is the small garden area; within the subject site there is a narrow garden bed between the driveway and boundary fence, and within the adjoining neighbouring yard there is a small garden bed of approx. $3 \times 2.5m$; in combination, these represent a very small permeable area for water and nutrient percolation into the root zone.

7.3 Tree 3

7.3.1 Health

Tree 3 is considered to be of fair/good health, as it presented with a suitably dense canopy mass and foliage exhibiting appropriate turgor and colour. Recent tip growth appeared vigorous and evenly distributed around the crown. Some minor areas of sparseness appear to be the result of browsing by possums; there were no other indications of active pests or diseases. Only very minor deadwood was observed within the canopy.

7.3.2 Structure

Tree 3 is comprised of a single dominant trunk with an abundance of laterals in a branching structure typical of a mature specimen of this species. Branch unions were good and there were no signs of abnormal reaction wood growth.

The tree is situated 2.6m from the garage wall, which did not exhibit any signs of damage. No damage to the nearby driveway or garden bed edging were observed. Given the base is hard on the boundary fence, it is expected that this will begin to exert pressure on the palings and may require the fence be modified to accommodate increased trunk girth in the long-term.

The tree is located in a small garden bed where a concrete driveway constructed in early 2018 is situated 0.65m south of the base of this tree, and 0.2m below grade of the garden bed. It is unknown what accommodations were made during construction, but provided the driveway was constructed sympathetically and ground protection used during construction to minimise soil compaction, the tree would likely have had the capacity to tolerate construction and this is reflected in the fair/good health observed during inspection. Of concern is the small garden area; within the subject site there is a narrow garden bed between the driveway and boundary fence, and within the adjoining neighbouring yard there is a narrow path between the boundary and neighbouring dwelling, which is expected to be completely intercepting all rainfall within that area of the root plate. In combination, the hard surfaces within both the subject site and adjoining property are expected to be intercepting water and nutrient percolation into the vast majority of the root zone. Consequently, in response it is expected that this tree will have developed a significantly distorted root plate, which may have implications for the tree's structural stability and resilience to windthrow.

8 Risk assessment

The level of risk associated with each tree was calculated using the Quantified Tree Risk Assessment (QTRA) calculator (Refer to Section 11).

The purpose of the QTRA assessment is the assess the risk rating of the component of each tree judged *most likely* to fail within the next year. For Tree 1 this was judged to be any one of several dead branches of under 100mm diameter (11.4) situated above the Council footpath (11.2); for Tree 2 any one the dead branches under 100mm diameter situated above the driveway and boundary fence; and for Tree 3 this was judged to be a small exposed apical branch of under 100mm diameter situated above the neighbouring dwelling. By its nature deadwood is prone to failure and has been allocated a probability of failure range of 3 (11.3); the exposed apical branch has been assigned a probability of failure range of 4.

According to the QTRA calculator, all three trees currently present with a broadly acceptable risk rating, where the risk is already as low as practicably possible.

	Tree 1	Tree 2	Tree 3
Target range	3	3	4
Probabilty of failure	3	3	4
range			
Size range	4	4	Property
Risk of Harm	<1 / 1 000 000	<1 / 1 000 000	<1 / 1 000 000
Risk rating	Broadly acceptable	Broadly	Broadly
		acceptable	acceptable

9 Conclusion

- All three subject trees are mature specimens that provide moderate amenity and ecosystem services. Trees 2 and 3 are in fair condition and appear to have tolerated the recent construction of the driveway well, and whose root systems seem to be accommodating the constrained growing conditions.
- Tree 1 is of fair/poor health and structure and appears to be of questionable underlying vigour and structural integrity. It is unknown what impact construction works in 2017/2018 had on the root plate, but the tree exhibits recent structural acclimitisation associated with loading stress.
- All three trees would benefit from weight-reduction and crown-cleaning pruning.
- The resident has expressed concern regarding the potential for damage to hard structures and underground services; given the constrained growing environment, the trees are considered to be at increased risk of causing damage to nearby structures. This potential for damage cannot reasonably be ameliorated with the installation of root barriers.
- Due to the potential for future damage associated with these trees, removal of all three trees is recommended.
- The removal of the trees will eliminate all risks and potential for damage.
- A permit is required to remove Trees 1 or 2 under VPO1 (4.1). Tree 3 is not protected under a local law or overlay.

10 Site map



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11 QTRA

11.1 Risk thresholds

Thresholds	Description	Action
4/4 000	Unacceptable Risks will not ordinarily be tolerated	· Control the risk
1/1,000	Unconstable	
	(where imposed on others) Risks will not ordinarily be tolerated	 Control the risk Review the risk
	Tolerable	
	(by agreement) Risks may be tolerated if those exposed to the risk accept it, or the tree has exceptional value	 Control the risk unless there is broad stakeholder agreement to tolerate it, or the tree has exceptional value Review the risk
1/10 000	Tolorable	
	(where imposed on others) Risks are tolerable if ALARP	 Assess costs and benefits of risk control Control the risk only where a significant benefit might be achieved at reasonable cost Review the risk
1/1 000 000	Describe Associated	
	Broadly Acceptable Risk is already ALARP	 No action currently required Review the risk

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11.2 Target range

Target Range	Property (repair or replacement cost)	Human (not in vehicles	5)	Vehicle Traffic (number per day)	Ranges of Value (probability of occupation or fraction of £2 000 000)
1	£2 000 000 - >£200 000	Occupation:	Constant – 2.5 hours/day	26 000 – 2 700 @ 110kph (68mph)	1/1 ->1/10
		Pedestrians	720/hour – 73/hour	32 000 – 3 300 @ 80kph (50mph)	
		& cyclists:		47 000 – 4 800 @ 50kph (32mph)	
2	£200 000 - >£20 000	Occupation:	2.4 hours/day – 15 min/day	2 600 – 270 @ 110kph (68mph)	1/10 ->1/100
		Pedestrians	72/hour – 8/hour	3 200 – 330 @ 80kph (50mph)	
		& cyclists:		4 700 – 480 @ 50kph (32mph)	
3	£20 000 - >£2 000	Occupation:	14 min/day – 2 min/day	260 – 27 @ 110kph (68mph)	1/100 - >1/1 000
		Pedestrians	7/hour – 2/hour	320 – 33 @ 80kph (50mph)	
		& cyclists:		470 – 48 @ 50kph (32mph)	
4	£2 000 – >£200	Occupation:	1 min/day – 2 min/week	26 – 4 @ 110kph (68mph)	1/1 000 - >1/10 000
		Pedestrians	1/hour – 3/day	32 – 4 @ 80kph (50mph)	
	& cyclists:			47 – 6 @ 50kph (32mph)	
5	£200 - >£20	Occupation:	1 min/week – 1 min/month	3 – 1 @ 110kph (68mph)	1/10 000 - >1/100 000
	Pedestrians		2/day - 2/week	3 – 1 @ 80kph (50mph)	
		& cyclists:		5 – 1 @ 50kph (32mph)	
6	£20 – £2	Occupation:	<1 min/month – 0.5 min/year	None	1/100 000 - 1/1 000 000
		Pedestrians & cyclists:	1/week - 6/year		

11.3 Probability of failure range

Probability of Failure Range	Probability		
1	1/1 - >1/10		
2	1/10 - >1/100		
3	1/100 - >1/1 000		
4	1/1 000 - >1/10 000		
5	1/10 000 ->1/100 000		
6	1/100 000 - >1/1 000 000		
7	1/1 000 000 - 1/10 000 000		
The probability that the tree or branch will fail within the coming year.			

11.4 Size range

Size Range	Size of tree or branch	Range of Probability				
1	> 450mm (>18") dia.	1/1 - >1/2				
2	260mm (101/2") dia 450mm (18") dia.	1/2 - >1/8.6				
3	110mm (41/2") dia 250mm (10") dia.	1/8.6 ->1/82				
4	25mm (1") dia 100mm (4") dia.	1/82 - 1/2 500				
* Range 1 is t	* Range 1 is based on a diameter of 600mm.					

12 Limitation of Liability

Melbourne Tree Company and their employees are tree specialists who use their qualifications, education, knowledge, training, diagnostic tools and experience to examine trees, recommend measures to enhance the beauty and health of trees, and attempt to reduce the risk of living near trees. Clients may choose to accept or disregard the recommendations of this assessment and report.

Trees are living organisms that fail in ways the arboriculture industry does not fully understand. Conditions are often hidden within trees and below ground. Unless otherwise stated, observations have been made from ground level and limited to accessible components without dissection excavation or probing. There is no guarantee that a tree will be healthy or safe under all circumstances, or for a specified period of time. Likewise, remedial treatments cannot be guaranteed.

Treatment, pruning and removal of trees may involve considerations beyond the scope of this report, such as property boundaries and ownership, disputes between neighbours, sight lines, landlord-tenant matters, and related incidents. Such issues cannot be taken into account unless complete and accurate information is given prior to or at the time of site inspection.

Information contained in this report covers those items that were examined and reflect the condition of those items at the time of inspection. There is no warranty or guarantee expressed or implied that the problems or deficiencies of the trees or property in question may not arise in the future. Trees can be managed, but they cannot be controlled. To live or work near a tree involves a degree of risk. The only way to eliminate all risks involved with a tree is to eliminate the tree.

All written reports must be read in their entirety, at no time shall part of the written assessment be referred to unless taken in full context of the whole written report.

13 Definition of terms

The following descriptors are used as indicators only. Other factors may be used in assessing an individual tree's health, structure, ULE, retention value and amenity value.

13.1 Tree health

Category	Description
Good:	The tree is demonstrating good or exceptional growth for the species. The tree is exhibiting a full can opy of foliage and may have only minor pestor disease problems. Foliage colour size and density is typical of a healthy specimen of that species.
Fair:	The tree is in reasonable condition and growing well for the species. The tree may exhibit an adequate canopy of foliage. There may be some dead wood in the crown, some grazing by insect or animals may be evident, and/or foliage colour, size or density may be atypical for a healthy specimen of that species.
Poor:	The tree is not growing to its full capacity. Extension growth of the laterals may be minimal. The can opy may be thinning or sparse. Large amounts of dead wood may be evident throughout the crown, as well as significant pestand disease problems. Other symptoms of stress indicating tree decline may be present.
Very poor:	The tree appears to be in a state of decline, and the canopy may be very thin and sparse. A significant volume of dead wood may be present in the canopy, or pest and disease problems may be causing a severe decline in tree health.
Dead:	The tree is no longer alive.

13.2 Structure

Category	Description
Good:	The tree has a well-defined and balanced crown. Branch unions appear to be strong, with no defects evident in the trunks or the branches. Major limbs are well defined. The tree would be considered a good example for the species. Probability of significant failure is highly unlikely.
Fair:	The tree has some minor problems in the structure of the crown. The crown may be slightly out of balance at some branch unions or branches may be exhibiting minor structural faults. If the tree has a single trunk, this may be on a slight lean, or be exhibiting minor defects. Probability of significant failure is low.
Poor:	The tree may have a poorly structured crown, the crown may be unbalanced, or exhibit large gaps. Major limbs may not be well defined; branches may be rubbing or crossing over. Branch unions may be poor or faulty at the point of attachment. The tree may have suffered major root damage. Probability of significant failure is moderate.
Very poor:	The tree has a poorly structured crown. The crown is unbalanced or exhibits large gaps. Major limbs are not well defined. Branch unions may be poor or faulty at the point of attachment. A section of the tree has failed or is in imminent danger of failure. Active failure may be present, or failure is probably in the immediate future.
Failed:	A significant section of the tree or the whole tree has failed.

13.3 Useful life expectancy (ULE)

Category	Description
Unsafe:	The tree is considered dangerous in the location and should be addressed as a priority
0 years:	The tree no longer provides any amenity value.
Less than 5 years:	The tree under normal circumstances and without extra stress should be safe and have value of maximum of 5 years. The tree will need to be replaced in the short term. Replacement plants should be established as soon as possible if there is efficient space, or consideration should be given to the removal of the tree to facilitate replanting.
5 to 10 years:	The tree undernormal circumstances and without extra stress should be safe and have value of maximum of 10 years. Trees in this category may require regular inspections and maintenance particularly if they are large specimens. Replacement plants should be established in the short term if there is sufficient space, or consideration should be given to the removal of the tree to facilitate replanting.
10 to 20 years:	The tree under normal circumstances and without extra stress should be safe and of value of up to 20 years. During this period, regular inspections and maintenance will be required.
20 + years:	The tree under normal circumstances and without extra stress should be safe and of value of more than 20 years. During this period, regular inspections and maintenance will be required.

13.4 Tree retention value

Category	Description
High:	The tree may be significant in the landscape, offer shade and other amenities such as screening. The tree may assist with erosion control, offer a windbreak or perform a vital function in the location (e.g. habitat, shade, flowers or fruit). The tree is free from structural defects and is vigorous. Consider the retention of the tree and designing the development to accommodate the tree.
Moderate:	The tree may offer some screening in the landscape or serve a particular function in the location and have minor structural defects. The tree may be entering the mature stage of its life cycle. The tree may be retained if it does not hamper the design intent.
Low:	The tree offers very little in the way of screening or amenity and may have significant structural defects. The tree may also be mature and entering the senescent stage of its life cycle. The tree may be removed if necessary.
Neighbouring tree:	The tree is located within an adjoining private property/land. The tree is to be protected unless written consent from the tree owner(s) and/or responsible authority is obtained. Consider the retention of the tree unless written consent is obtained from the tree owner and/or responsible authority.
Counilowned tree:	The tree is located within Council owned land. The tree is to be protected unless written consent from the responsible authority is obtained. Consider the retention of the tree unless written consent is obtained from the tree owner and/or responsible authority.

13.5 Age

Category	Description
Young:	Juvenile or recently planted approximately 1-7 years.
Semi Mature:	An established tree but one which has not reached its potential ultimate height and has significant growth potential. Tree is actively growing.
Mature:	Tree has reached expected size in its growing conditions.
Senescent:	Tree is over mature and has started to decline.
Dead:	The tree is no longer alive.

13.6 Amenity value

Category	Description
Very Low:	Tree makes little or no amenity value to the site or surrounding areas. In some cases, the tree might be detrimental to the area's amenity value (e.g. unsightly, risk of weed spread).
Low:	Tree makes some contribution of amenity value to the site but makes no contribution to the amenity value of surrounding areas. The removal of the tree may result in little loss of amenity. Juvenile trees, including street trees are generally included in this category. However, they may have the potential to supply increased amenity in the future.
Moderate:	The tree makes a moderate contribution to the amenity of the site and/or may contribute to the amenity of the surrounding area.
High:	The tree makes a significant contribution to the amenity value of the site, or the tree makes a moderate contribution to the amenity value of the larger landscape.

13.7 Terms within the tree data table

Category	Description
DBH:	Diameter at breast height (1.4m from ground level). Combined DBH has been calculated according to the Australian Standard AS4970 – 2009 'Protection of Trees on Development Sites'.
DAB:	(Diameter above buttress) Diameter of the trunk measured immediately above the root buttress.
CA1 / CA1.5:	Circumference of trunk at either 1m or 1.5m from ground level. Combined circumference is the sum of individual stem circumferences.
TPZ:	(Tree protection zone) An area set as ide for the protection of a tree's roots and crown to provide for the viability and stability of a tree to be retained where it is potentially subject to damage by development. Typically expressed as a radius in metres that defines a circle with the trunk/stem at its centre.
SRZ:	(Structural root zone) An area around the base of a tree required for the tree's stability in the ground. Woody root growth and soil cohesion in this area are necessary to hold the tree upright. Typically expressed as a radius in metres that defines a circle with the trunk/stem at its centre.

14 Quantified Tree Risk Assessment – Version 5

The input values for the three components of the QTRA calculation are set out in broad ranges of Target, Size, and Probability of Failure. The assessor estimates values for these three components and inputs them on either the manual calculator or software application to calculate the Risk of Harm.

14.1 Assessing Land-use (Targets)

The nature of the land-use beneath or adjacent to a tree will usually inform the level and extent of risk assessment to be carried out. In the assessment of Targets, six ranges of value are available. Table 2 sets out these ranges for vehicular frequency, human occupation and the monetary value of damage to property.

14.2 Human occupation

The probability of pedestrian occupation at a particular location is calculated on the basis that an average pedestrian will spend five seconds walking beneath an average tree. For example, an average occupation of ten pedestrians per day, each occupying the Target for five seconds is a daily occupation of fifty seconds, giving a likelihood of occupation 1/1,728. Where a longer occupation is likely, as with a habitable building, outdoor café, or park bench, the period of occupation can be measured, or estimated as a proportion of a given unit of time, e.g. six hours per day (1/4). The Target is recorded as a range.

14.3 Weather Affected Targets

Often the nature of a structural weakness in a tree is such that the probability of failure is greatest during windy weather, while the probability of the site being occupied by people during such weather is often low. This applies particularly to outdoor recreational areas. When estimating human Targets, the risk assessor must answer the question 'in the weather conditions that I expect the likelihood of failure of the tree to be initiated, what is my estimate of human occupation?' Taking this approach, rather than using the average occupation, ensures that the assessor considers the relationship between weather, people, and trees, along with the nature of the average person with their ability to recognise and avoid unnecessary risks.

14.4 Vehicles on the Highway

In the case of vehicles, likelihood of occupation may relate to either the falling tree or branch striking the vehicle or the vehicle striking the fallen tree. Both types of impact are influenced by vehicle speed; the faster the vehicle travels the less likely it is to be struck by the falling tree, but the more likely it is to strike a fallen tree. The probability of a vehicle occupying any particular point in the road is the ratio of the time it is occupied - including a safe stopping distance - to the total time. The average vehicle on a UK road is occupied by 1.6 people (DfT 2010). To account for the substantial protection that the average vehicle provides against most tree impacts and in particular, frontal collisions, QTRA values the substantially protected 1.6 occupants in addition to the value of the vehicle as equivalent to one exposed human life.

14.5 Property

Property can be anything that could be damaged by a falling tree, from a dwelling, to livestock, parked car, or fence. When evaluating the exposure of property to tree failure, the QTRA assessment considers the cost of repair or replacement that might result from failure of the tree. Ranges of value are presented in Table 2 and the assessor's estimate need only be sufficient to determine which of the six ranges the cost to select. In Table 2, the ranges of property value are based on a VOSL of £2,000,000, e.g. where a building with a replacement cost of £20,000 would be valued at 0.01 (1/100) of a life (Target Range 2). When assessing risks in relation to buildings, the Target to be considered might be the building, the occupants, or both. Occupants of a building could be protected from harm by the structure or substantially exposed to the impact from a falling tree if the structure is not sufficiently robust, and this will determine how the assessor categorises the Target.

14.6 Multiple Targets

A Target might be constantly occupied by more than one person and QTRA can account for this. For example, if it is projected that the average occupation will be constant by 10 people, the Risk of Harm is calculated in relation to one person constantly occupying the Target before going on to identify that the average occupation is 10 people. This is expressed as Target 1(10T)/1, where 10T represents the Multiple Targets. In respect of property, a Risk of Harm 1(10T)/1 would be equivalent to a risk of losing £20,000,000 as opposed to £2,000,000.

14.7 Tree or Branch Size

A small dead branch of less than 25mm diameter is not likely to cause significant harm even in the case of direct contact with a Target, while a falling branch with a diameter greater than 450mm is likely to cause some harm in the event of contact with all but the most robust Target. The QTRA method categorises Size by the diameter of tree stems and branches (measured beyond any basal taper). An equation derived from weight measurements of trees of different stem diameters is used to produce a data set of comparative weights of trees and branches ranging from 25mm to 600mm diameter, from which Table 1 is compiled. The size of dead branches might be discounted where they have undergone a significant reduction in weight because of degradation and shedding of subordinate branches. This discounting, referred to as 'Reduced Mass', reflects an estimated reduction in the mass of a dead branch.

14.8 Probability of Failure

In the QTRA assessment, the probability of tree or branch failure within the coming year is estimated and recorded as a range of value (Ranges 1-7, Table 3). Selecting a Probability of Failure (PoF) Range requires the assessor to compare their assessment of the tree or branch against a benchmark of either a non-compromised tree at Probability of Failure Range 7, or a tree or branch that we expect to fail within the year, which can be described as having a 1/1 probability of failure. During QTRA training, Registered Users go through a number of field exercises in order to calibrate their estimates of Probability of Failure.

14.9 The QTRA Calculation

The assessor selects a Range of values for each of the three input components of Target, Size and Probability of Failure. The Ranges are entered on either the manual calculator or software application to calculate a Risk of Harm. The Risk of Harm is expressed as a probability and is rounded, to one significant figure. Any Risk of Harm that is lower than 1/1,000,000 is represented as <1/1,000,000.

14.10 QTRA Informative Risk Thresholds

The QTRA advisory thresholds in Table 4 are proposed as a reasonable approach to balancing safety from falling trees with the costs of risk reduction. This approach takes account of the widely applied principles of ALARP and ToR, but does not dictate how these principles should be applied. While the thresholds can be the foundation of a robust policy for tree risk management, tree managers should make decisions based on their own situation, values and resources. Importantly, to enable tree assessors to provide appropriate management guidance, it is helpful for them to have some understanding of the tree owner's management preferences prior to assessing the trees.

A Risk of Harm that is less than 1/1,000,000 is Broadly Acceptable and is already ALARP. A Risk of Harm 1/1,000 or greater is unacceptable and will not ordinarily be tolerated. Between these two values, the Risk of Harm is in the Tolerable Region of ToR and will be tolerable if it is ALARP. In the Tolerable

Region, management decisions are informed by consideration of the costs and benefits of risk control, including the nature and extent of those benefits provided by trees, which would be lost to risk control measures.

For the purpose of managing risks from falling trees, the Tolerable Region can be further broken down into two sections. From 1/1,000,000 to less than 1/10,000, the Risk of Harm will usually be tolerable providing that the tree confers 'average benefits' as discussed above. As the Risk of Harm approaches 1/10,000 it will be necessary for the tree manager to consider in more detail the benefits provided by the tree and the overall cost of mitigating the risk.

A Risk of Harm in the Tolerable Region but 1/10,000 or greater will not usually be tolerable where it is imposed on others, such as the public, and if retained, will require a more detailed consideration of ALARP. In exceptional circumstances a tree owner might choose to retain a Risk of Harm that is 1/10,000 or greater. Such a decision might be based on the agreement of those who are exposed to the risk, or perhaps that the tree is of great importance. In these circumstances, the prudent tree manager will consult with the appropriate stakeholders whenever possible.

Planning Overlays and Zones



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