

INQUIRY INTO IMPACT OF THE CBD AND SOUTH EAST LIGHT RAIL PROJECT

Organisation: Saving Sydneys Trees

Date Received: 7 July 2018



Saving Sydneys Trees

Saving Sydney's Trees Incorporated

Submission in response to the Inquiry into The CBD and South East Light Rail 2018

This inquiry was established on the 22 May 2018, to inquire into and report by 1 December 2018 on the impact of the construction of the CBD and South East Light Rail Project ("the project") on residents and businesses in the vicinity of the light rail route.

Committee membership

Rev the Hon Fred Nile MLC Christian Democratic Party(Chair)
The Hon Matthew Mason-Cox MLC Liberal Party (Deputy Chair)
The Hon Greg Donnelly MLC Australian Labor Party
Mr Justin Field MLC The Greens
The Hon Courtney Houssos MLC Australian Labor Party
The Hon Trevor Khan MLC The Nationals
The Hon Natalie Ward MLC Liberal Party

Terms of reference

1. That the Public Accountability Committee inquire into and report by 1 December 2018 on the impact of the construction of the CBD and South East Light Rail Project (“the project”) on residents and businesses in the vicinity of the light rail route, including:

- a) the adequacy of the government’s response to the financial impact and diminution in social amenity caused by the project on residents and businesses including access to financial compensation and business support services,
- b) the appropriateness and adequacy of the financial compensation process established by the assessment process and consistency of outcomes,
- c) the effectiveness of the government’s communication with residents and businesses concerning project delays and financial compensation, and
- d) any other related matters.



Introduction

Saving Sydney's Trees (SST) is a young, but now well-established Group with a network of more than 12,000 supporters.

Key objectives within our Constitution include the promotion of open and transparent governance and planning processes with the intention of valuing and ensuring protection of those community assets and amenity associated with urban green space, trees and flora. Our particular concern is to minimise tree canopy loss across the growing Greater Sydney area.

The formation of this group and associated network in 2016 was in response to the felling of hundreds of Sydney's most Significant Trees to make way for the South East Light Rail Project. As our Historic Centennial Park Trees along Alison Road i.e. "Maiden's Row" and ANZAC Parade memorial trees were felled, the public have sent a clear message of distress, disapproval and failed expectation of the government in relation to this and other infrastructure works across the region.

While many will point to other problems within this project, Saving Sydney's Trees (SST) will endeavour to "speak for the trees" and present the necessary case for their recognition in planning and the Cost Benefit Analysis as well as their protection and accountability implicated within the "Consent Conditions" assigned to this project.



Response to Terms of Reference

We respond to the four terms of reference;

a) the adequacy of the government's response to the financial impact and diminution in social amenity caused by the project on residents and businesses including access to financial compensation and business support services.

1. Social Amenity

SST submits that there has been a markedly inadequate response by the government to the diminution in social amenity on present and future generations of residents in Greater Sydney.

Social amenity is synonymous with sense of community and can be described as the degree to which a person feels they belong to a readily available, supportive and dependable social structure. Sense of community can be associated with connections to the physical characteristics of the built environment and the social characteristics of a place¹. Social amenity also includes a sense of belonging and identification with a place. Sydney has a particular landscape heritage in the form of avenues of Moreton Bay figs planted in the mid-19th century and Hills Weeping figs planted in 1930-1950s².

The destruction of parts of the significant and complete avenue of figs along Anzac Parade, Alison Rd and proposed Dacey Avenue has diminished social amenity for Sydneysiders in a deep and profound way.

Social amenity also includes places where social functions and activities can occur. These are convergence spots such as urban open space, streets and parklands. The diminution in social amenity caused by the project on residents due to the loss and damage to large shading urban trees is particularly distressing due the increased outdoor temperatures, resulting from general climate change and the Urban Heat Island (UHI) that exists in the adjoining high-density suburbs and can be anticipated with the increased density proposed along the South East Light Rail Project's route.³

In terms of shade, amenity, and health impacts of UHI associated with the project, the recent 2020Vision⁴ study found;

- Tree coverage in parts of Sydney are among the lowest in the country
- Some western and south-east areas have as little as 12% tree coverage
- Randwick has 14.2% coverage and the City of Sydney, 15.2%.

- Bankstown has 17.1%, Sutherland 42.1%, Warringah 58%
- CSIRO has found that boosting green spaces can help reduce the number of heat wave related deaths among the elderly in the city.

In this situation, the loss of and damage to the trees in the vicinity of the South East Light Rail Project shows a serious diminution of social amenity and a lack of social responsibility.

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1. Planning Social Infrastructure and Community Services for Urban Growth Areas, prepared for Local Government Association of South Australia 18 May 2011
 2. Armstrong, Helen. 1985. "18th Century Influences of Street Planting in New South Wales" in *Landscape Australia*. Vol. 3. 1985. Pp 200-212; Armstrong, Helen. 1989. "Urban and Rural Avenues in the Australian Landscape". *Landscape Research*. Vol. 14, No. 2. Pp 22-26.
 4. Brent Jacobs (2014) Benchmarking Australia's Urban Tree Canopy: An i-Tree assessment, Institute for Sustainable Futures, UTS
 3. www.2020Vision.com.au Where are all the Trees? An Analysis of Tree Canopy Cover in Urban Australia.
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2. Adequacy of the government's response to the impact on the immediate community.

In terms of social amenity and shade trees in the immediate vicinity of the route, tree size is a major factor; followed by how many people enjoy the trees; the size – area and depth- of the canopy; trees' life expectancy, and any special factors, such as landscape heritage issues. The adequacy of the government's response to the projects impact on the trees is to be seriously questioned.

3. Increased Health Problems

"Tree Plans" have been painstakingly drawn up with canopy and tree assessments. Analysis of the South East Light Rail project, despite expectation presented to the public, sees an initial 9-hectare loss of canopy – a severely negative outcome - which can only be rectified over 20-50 years of productive growth depending on species and survival rates.

This places enormous negative impacts upon the public and its purse. The lack of accounting for this in the Planning Process and Cost Benefit Analysis does not dissipate its real negatives, it only reveals a flaw in process. The well documented and linked, Respiratory disorders, Asthma, Particulate cancers, Alzheimer's, Parkinson's, Obesity and Mental Illness issues cannot be dismissed from planning responsibility. The role of the trees and their canopy must include the costs these illnesses if the canopy is removed.

The public of Sydney have been charged the cost of building a Project that, as well as depleting the liveability of their area, has created a Heat Island and air quality problem, as well as water table implications.

Randwick and other areas of Sydney are fast approaching Environmental Protection Authority dangerous levels. The planned population increases will surely take these over the limit (areas of the West Connex already have passed these limits) and render our public, children, elderly and vulnerable not only to well-being and health problems, increased Energy costs-and social implications. This is directly counter to Article 21 and places this and other projects and practices of Infrastructure and Planning; Transport NSW in line for immediate analysis and review.

The depletion of, and lack of enough room to replant in this already heavily populated and developed area, now leaves added burden of energy costs, again well documented with such canopy degradation and removal.

4. Losses to Community

At a time of climate and population challenges, the losses to Community can be summarised:

- Lost amenity for Community and transport convenience in proximity of stops and ease of one stop travel;
- Loss of parking spaces; closure of local shops; loss of traffic lanes causing traffic congestion;
- Increased door to door and protective tree amenity from heat and rain and health damage;
- Economic disadvantage;
- Added rate burden;
- Loss of ease of access and amenity to its Hospital and Emergency services provision;
- Further loss of its Commons bequeathed in Perpetuity for Private Profit.

b) the appropriateness and adequacy of the financial compensation process established by the assessment process and consistency of outcomes,

SST submits that the appropriateness and adequacy of the financial compensation process is both inappropriate and inadequate.

Appropriateness: How do apply financial compensation for the loss of heritage to current and future generations?

Inappropriate Offset Strategy

NSW Planning and Environment SEARS process would seem to reflect many aspects of Agenda 21. However, it is clear this has not happened in the CSELR project. Instead, the community is now faced with the depletion of protective tree canopy, so urgently needed as the intensity of development increases in adjoining precincts along the route of the CSELR. The people of Sydney were told that any 'significant tree' removal would be "Offset" by planting 6-8 trees for each "Significant" tree lost;-the initial number-being approximately 1200 trees, approximately 800 of significant status.

Like so many of the projects we witness at present, these "Offsets" actually are not offsetting the extent of depletion; nor are they able to be supported and grown in the depleted areas. Thus, replenishment to the public is not occurring. Rather, a "Creeping Deficit" with enormous negative costs to the public and future generations is being accrued at an alarming rate. Over 1200 trees will be removed; over 800 of stated Significant status. Yet, we are told 1800 is the offset.

Adequacy:

- What is the value of shade provided by trees that drop temperatures by up to 8C, reduce air conditioner use and reduce carbon emissions? Estimates put the savings on air conditioning alone at between 12-15% per annum.
- What is the value of reduced wind speeds of up to 10% due to the presence of trees under a climate change scenario when winds will be stronger?
- What is the value of removing pollutants from the air of Australian cities? The value returned to the City of Melbourne by its public trees alone would be more than \$14 million per annum.
- What is the value of trees in holding and absorbing water and reducing localized flooding during intense rainfall events under a changed climate?

G. M. Moore⁴ from Burnley College in Victoria asked these questions about financial compensation for the loss of urban trees, such as those lost and damaged by Sydney's Light Rail project. The following table provides an estimate.

Table1: Estimates of environmental economic values for 100,000 large mature urban trees growing in an Australian city (Moore,2009b)

Parameter	Value per tree	Quantity	Unit Price AUD\$	Value AUD\$
Carbon sequestered in trees	12.5 tonne	1.25million tonne	\$20 per tree	\$25 million
Street Tree value	\$ AUD200 per annum			\$20million per annum
Electricity Saving	30KWh	3 million kWh	\$0.17 per kWh	\$510,000 per annum
Carbon emissions saved	1.2Kg for each kWh	3,600 tonne \$20 per tree	\$72,000 per annum	\$72,000 per annum

Notes on estimations and calculations:

- the estimate of 12.5 tonne is for a large mature urban tree
- the price of AUD\$20 per tonne is based on the Australian carbon market price
- the electricity saving is based on reduced energy use due to shade from trees
- the price used for electricity is based on a rounded Victorian rate per kWh
- water valued at \$1.50 per kilolitre
- assumes tree canopy of 75m² shading bitumen covering 30% of its canopy area⁵

4. Moore G M (2009a) People, Trees, Landscapes and Climate Change, in Sykes H (Ed) Climate Change for Young and Old, p 132-149. Future Leaders, Melbourne

5. Moore G M (2009b) *Urban Trees: Worth More Than They Cost* Lawry D, J Gardner and S Smith Editors, Proceedings of the Tenth National Street Tree Symposium, 7-14, University of Adelaide/Waite Arboretum, Adelaide

Killicoat, P, Puzio, E, and Stringer, R (2002), *The Economic Value of Trees in Urban Areas: Estimating the Benefits of Adelaide's Street Trees*. Proceedings Treenet Symposium, 94-106, University of Adelaide.

c) the effectiveness of the government's communication with residents and businesses concerning project delays and financial compensation.

Redacted GIPA Reports

SST has been alarmed and disappointed by the delays and 80-90% redacted documents provided in response to a formal request for information

The independent team's responsibility included Assessment, Analysis, Advice, Reports and Management; however, GIPA TRA 000659 in specific reference to the ANZAC Parade Road Diversion has failed to provide these assessments. They are referred to but have been "redacted". (Appendix 3) in the supplied and completely unsatisfactory material.

Noteworthy also is a GIPA directed to Premier and Cabinet found no communication sought or sent to the Premier. This abdication of responsibility, given the controversy surrounding this Project, would seem grossly negligent.

e) any other related matters.

1. Contravention of UN Agenda 21

At a Workshop conducted by Planning NSW, Tim Kirby who identified himself as "Premier and Cabinet" gave assurance that "ARTICLE 21 of the United Nations Guidelines for Sustainable Development"¹ (Appendix 1) underpinned ALL planning in NSW. Clearly from what we are seeing this comment requires questioning. Within this document, Article 21, the objectives and outcomes can have no compromise.

It stipulates:

The absolute and comprehensive study of an area and its unique environment, which in its explanation encompasses: -

Ecology; Geology; Soil quality and chemistry; Social structure; Indigenous (i.e. existing community); Elderly, Young and Infirmed and DO NO HARM!

It establishes the understanding of "Maximising Potential" and "Sustainable Development"; NOT as we see them distorted by developers today which trends more to seeing how many Units can fit on a designated property.

Agenda 21 works only to enhance, that which is already functioning.

2. The Responsibility of Centennial Parklands and Moore Park Trust

Centennial Parklands and Moore Park Trust have allowed the further taking of these historic Public Commons in good faith, but, without it appears, Due Diligence. This is seen as a critical area of investigation as under their stewardship the public have already lost two thirds of their asset to Private "For Profit Enterprises".

There has been a Failure of the Trust to Protect the Public amenity.

Global Eel Migration

Conversation with Centennial Parklands staff, in reference to the Global Eel Migration (presented in cooperation with the Centennial Parklands rangers and staff with ABC "Catalyst" investigators some years back) assured us that NO agreements would be

given that negatively impacted the parklands. Yet, the damming of the levy bank and drainage that these eels need, along with proposed works towards Botany Bay show no regard for this Global Food chain of events. We call for full disclosure and documentation.

3. Increased Flooding due to Removal of Trees

Flood reports conducted by Randwick Council indicate clearly the need to retain green grassed areas and trees to dissipate run off have been ignored. Already resultant flooding and the role that construction of light rail is playing has been ignored by TfNSW and the planners of this project. Flooding into Alison Rd. shortly after the removal of the “Maidens Row” trees and their soaking root systems asset was documented in local papers. This again, points to unacceptable or incompetent scoping.

4. Inadequate Scoping of Hydrology and Geology along Light Rail route

It must be pointed out here, that engineers can build most things, if allowed. The processes that controls such an attitude involves the implementation of a true “Merit System” and responsible adherence to the public well-being and irreparable environmental interference.

For, while engineers can build storm water drains all over the city to cope with run off, they cannot change the underlying geology of an area. Some of the Route for the Light Rail is a geological Wetland; a moving water passage to Botany Bay. This moving mud and sand stream, with the approach of rising tides and rain, turns to an effective river. The implications of this on the zonal changes this transport modal change brings, poses immense danger and hardship to the State’s Budget and individual purse and community well-being.

This area is now depleted of its trees due to the light rail. Thus, the trees that would help protect the public from these water impacts have been removed from the area of most need.

5. Implications on Higher Density

The laying of foundations for the high rise allowed by the Premier, constitutes an effective damming or boulder effect in the underground systems of water and pressures. This increases with each “boulder”/foundation added and creates a form of underground rapid e.g. in Maroubra Junction, after the building of Pacific Square, an eight-storey apartment block and shopping centre that replaced a more modest Mall, was functioning quite well, until the single-storey Post Office building adjacent was developed to a similar height. The basement areas of Pacific Square now have a water problem of seepage. Residents in Kensington have reported similar problems in years past from this sort of thing.

The depth of foundations in unjustified yet allowed development height changes, places enormous building pressures on the existing built structures. This is foreseen as a perspective “class action” by residents and even developers alike as a result of this lack of adequate scoping.

We urge for an immediate stop and re appraisal of this zoning and project.

6. Ignoring Historical Data: Accountability of Professional Experts

The history of this area is recognised as a major part of the reason the original tram system was removed, as the ongoing cost of repairs and stoppages of service associated with it. This seems to have been, like many other aspects of assessments, to have been ignored, unrecognised, or eliminated; yet, with the Premier's seal, it has proceeded.

The figures quoted on Capacity and Congestion alleviation, along with the original SAMSA Independent Report provided to the Government, along with the Auditor General's scathing report of rounding up and down of figures without justification, points to their lack of investigation of what was presented to them.

7. Urban Tree Management: Non-adherence to Standards

Consent Condition B47 and B48 relate to the tree protection and process to be followed in this project; a clear indication of the required processes to be adhered to. This was considered so Imperative and requiring full Documentation that an independent team, *Urban Tree Management*, was appointed to manage it following Australian Standards AS 4970 2 (Appendix 2).

Community observation and documented photographs show NON- adherence to these standards (Appendix 4).

The implications of non-adherence to Standards related to the ANZAC Parade Trees is extremely urgent, for as the community have observed and in light of the other non-observance, these trees will present a danger to the public if proof otherwise is not found. Adding even more to the negative and dangerous impacts by acting upon inadequate irresponsible Concept Planning that seems more designed to appeal to developers than to the public benefit.

The lack of appropriate monitoring of tree management is currently being considered by the Environmental Defenders Office.

8. Inappropriate Contractual and Consent Procedures

The non-following of process by awarding of the contract on the same day before the close of Submissions, 17 December 2014 was not only counter to the public wishes but not in the public interests. This is the subject of much disapproval for it is in breach of the B47 (pertaining to the 2 trees on the corner of the Darley Rd. and Alison Rd. boundary of Centennial Parklands entry) and B48 Consent conditions. This again calls the actions of the Trust and the State Government to account to the Public of NSW.

The means of accounting and compensation used in this modification also requires analysis on just how a figure was arrived at, and if that was realistic given the magnitude of impact caused by the removal of these trees.

9. Other Negligent Contract Procedures

- It also places the Inglis/Barker St. ATC association and final approval under a shadow where Approval was granted for an inappropriately large development, rendering NO affordable housing outcome, and submitted well before the public were informed of the light rail and high-rise zoning.

- The asserting of an again ill-advised and unjustified Development Precinct by the Premier O'Farrell who was the Minister for Gambling. While he bowed initially to public opinion, his replacements have continued with it and this development has found itself gaining consent. This added pressure to the Hospital amenity would seem to be under yet its own shadow of questionable procedural processes requiring examination.
- The route and actions of the "For Private Profits" interests of the Singleton, Harvey and Carnegie Consortium, who sought approval for this Tram Mode and associated zone allowance before taking on their lease, also places the need for investigation into the destructive route choice and approval of the project over a less devastating and recognised best choice, underground option.
- The Langdon Clinic tree on South Dowling St. where the tunnel comes out to a terminus, at what was the residency of "Olivia Gardens". Despite the efforts of Sydney City Council Engineers and City of Sydney, Mayor Clover Moore to save this tree by a slight realignment presented to ACCIONA, it was refused on a cost and time basis. This would indicate a "too hard basket" approach by ACCIONA and is also in breach of the B48 Consent Conditions that places no such economic considerations. Noteworthy here, is the time incentive Contract under which ACCIONA are operating which was imposed on it by NfNSW. This is seen as an incentive to poor quality rather than expedience of quality assessment and implementation. This tree is seen as such a victim.
- The Historic and Highly significant "Tree of Knowledge" on High St. Wansey Rd. corner, with recognised History for UNSW and the local Public, saw the appeal by Randwick Council at the request of its community to again realign the route to accommodate its retention, reflected not an engineering problem but a monetary response. However no public record was presented of the scoping of such an idea and again points to a complete disregard for Consent Condition B48. And the Public interests.
- The second row of young figs on ANZAC Parade were Eastern Distributor "Offset" trees and were presented on the plans for removal and return. This was also included in the costing. However, the tree plan must not have been discussed with the Trust, who indicated they didn't want them and there was no room, given redesign plans they apparently had in process. The public sought assistance from Randwick Council who found room for them, but 10 of the 25 were fed to the Chipper before the public could stop them. Indicating again the lack of public interaction and communication within the project.
- The viability of the remaining trees has been hugely depleted but now sit in the haven of Heffron Park. Thanks NOT to the adherence of B48 compliance but to the efforts of the PUBLIC. This is again seen as a complete disregard by ACCIONA; TfNSW; Centennial Parklands Trust and Infrastructure NSW and

needs thorough investigation if this is not to be repeated and the trust of the public in its departments and Governance further eroded.

- Other negatives to the health and longevity of the trees in this project are documented here. (Appendix 5)
- Needless to say, this should not be the activities a project of this type and significant impact should be monitored. The public have had 2 lanes of Critical access roads turned over to TfNSW to be sold off to a Private Contractor who will in turn profit from the Public.

10. Other Procedural Issues

1. If corruption has occurred, then the nature of the corruption should be investigated with a referral to the ICAC. However, is it corruption or is it a question of whether the government has the capacity of commissioning and seeing through such a large project?
2. Has the government ensured the engineering of the project was possible and would not lead to unforeseen costs on the public purse. Government is required to do economic case for an infrastructure build, but where is the corresponding feasibility study from the Engineers; whether they be public or private. Where is the proof of concept? Where is the empirical evidence that the project could meet the communities needs now or in the future and that it had been evaluated against other solutions?
3. The lack of compliance to standards as witnessed by SST with tree management. What are the safety implications and long-term costs? What other shortcuts on standards and industry best practices have occurred given that they occurred with trees?
4. The long-term effects on the hydrology of the area. We have the need for a \$200 million dam that was unforeseen when construction occurred. WHY? Where was the oversight in the design process by hydraulic engineers, the feasibility of delivering the project on the chosen footprint? What does the dam retrofit actually cost the community with loss of Parklands?
5. Why are there dumps of soil and sediment alongside Sydney Boys High School without any apparent dust control. Why is the EPA silent on this issue and others raised by the projects construction processes, of pollution and ecological damage?
6. Why did the premier fail to undertake his statutory role as protector of NSW's share of the National Estate, to prevent the felling of trees on Anzac parade or incursion into the Parklands. Is this corruption? a criminal act? A failure of statutory duty that has a penalty for Mike Baird? Has the devolution of the National Estate from Commonwealth to State government effectively left this heritage category unprotected?
7. The political cowardice of the narrowness of the terms of reference, the failure of the upper house to come up with terms of reference that seek to illuminate and learn lesson from this grossly over budget, overtime, infrastructure, that will be fully subscribed when built and unable to meet growth of populations on route. Yet is used to justify urban consolidation along the route.

8. The failure of both Houses of Parliament to insist the executive government takes responsibility for the many failures in this project and seek insights that point the way forward both this project and future infrastructure builds. We all make mistakes, organisation, governments are not different to individuals. The key duty of the parliament is to ensure lessons are learn in this case.

9. This development has occurred fully within a Public Service incapable of the oversight role on public private infrastructure development. Has the use of external consultant increased the cost of this project on the citizens of NSW? The duty of the parliament inquiry is to cut through the ideology. Determine why this project has failed to be on time on budget and truly costed.

10. A safety audit of the project in its entirety needs to occur. Given that SST has identified a potential safety issue with trees that has not been replied to, what has occurred elsewhere across this sprawling infrastructure project that continues to design as it builds.

11. Why was the entire length of the light rail opened as a building site. Why wasn't it worked on in parts, bringing each part to near completion, returning each section to public use. Instead the project disrupts the entire region over its footprint placing and heavy burden on both the economic activity and the amenity of the city. It is an obstacle for all live on it as it is for those who need to travel to and from the Eastern Suburbs and through the CBD. It is an ugly scar upon the surface of our city.

12. It is an ugly scar on our city. Even when the development is complete, it will detract from the existing landscape. Along the Parklands, Devonshire St, Central and into the Quay, its minimalist, utilitarian mechanical appearance is at odds with both the bio-morphism and the heritage of the existing built landscape. Even with the minimal landscaping planned the design will be an eyesore imposed on the landscape. And for those involved in this project this is its greatest danger, this eyesore will forever stand out for the citizens of this state reminding them of everything that is wrong with this project. It will leave no one who was involved untouched. This project will sit like a noose around the neck of all who participated in its construction.

Conclusion

*This is a Public Private Project that clearly fails the Public long-term interests.

*This Project is not as was presented. Health and well-being costs have NOT been included in the Cost Benefit Analysis, nor represented to the Public;

*This project has ignored the Conditions of Consent; e.g. Offset in canopy inconsistent and detrimental, at planning stage;

*This project has contributed to Randwick Residents facing a 19.86% rate increase over the next 5 years; this follows a previous \$68 million allocation. As stated in the rationale, much of this is needed to mitigate the effects of the NSW State Government actions and much more to be seen in other submissions.

We call for:

- Public release of ALL documentation, reports and communications to all parties involved in this Project;
- Immediate and Mandatory inclusion of a \$ cost on the amenity of tree canopy and green spaces in relation to the linked Health and Energy Budget, to be included in the Cost Benefit Analysis;
- A Clear and Consistent process of Accountability and Audit, that insures Protection and true Conservation outcomes in “offsets”, that are in the area and protect the public;
- Investigation into Trust adherence and adequate understandings of good practice.
- Investigation into the Prudence and process of collaboration of UNSW and the ATC in initiating the project’s Feasibility report (2011);
- The acceptance of this PPP by Randwick Councillors and advice given to them by the staff and General Manager and legal representatives.

We look for Better pathways to a more resilient Future for our future generation.

Saving Sydney’s Trees

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Appendices

APPENDIX 1:

<http://www.undp.org/content/undp/en/home/sustainable-development-goals/goal-11-sustainable-cities-and-communities/targets/>

APPENDIX 2:

Tree Standards

APPENDIX 3:

GIPPA TRA 000659

APPENDIX 4:

Tree non- compliance documentation

All APPENDICES are available by request to SST who is also available for presentations and explanations.

We make note that there are on-going activities with the Environmental Defenders Office over the South East Light Rail project.