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## ACT DRAFT URBAN FOREST STRATEGY

Thank you for the opportunity to comment on the ACT draft Urban Forest Strategy (the Strategy) which we consider takes a comprehensive and integrated approach, dealing as it does with legislative frameworks, infrastructure, compliance, incentivisation and partnerships with the community. It is, for the most part, evidence based.

We applaud the acknowledgment by Minister Steel that the urban forest is 'part of our identity as the bush capital: a city within a landscape'.

The urban forest or green space is essential for maintaining the garden city ideals, open space for health living and sustainability (global warming). It needs to be defined and promoted and integrated with all potential development. The concept is strongly supported.

We also strongly endorse the target of achieving 30% canopy cover by 2045 within 'the context of the legacy of our first major plantings' and recognise that much of the urban forest will reach the end of its natural life in the coming decades. [https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.act-yoursay.files/6715/9545/9570/Urban\\_Forest\\_Strategy-Final-accessible.pdf](https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.act-yoursay.files/6715/9545/9570/Urban_Forest_Strategy-Final-accessible.pdf)

It should be noted that many of these landscapes have been valued so highly, for their historical links to the Garden City movement, that they have been given heritage protection.

We also appreciate the effort to identify, with clarity, the six major steps necessary to achieving a resilient urban forest providing a greater canopy cover for Canberra.

### **1. Protect the urban forest**

To develop a legislative framework for tree protection that ensures 'exceptional trees and those with high biodiversity and eco-cultural values continue to have the highest level of protection, trees being protected and mature and remnant native trees on public land being conserved effectively', p. 6, the Strategy, is highly desirable.

Development should consider public open space which get sun and is protected from wind as part of the DA. This needs to be enshrined in the planning controls.

Developers should not expect to be able to build on 100% of a block and expect the existing open space will satisfy all the tenants' needs for open space. The developments occurring along Northbourne Ave and in Braddon will mean undue pressure on this important heritage feature, while not meeting conservation or public use desires.

Further, legislation should address the actions that cause damage to the historical patterns of tree plantings with recognised heritage value, particularly along avenues with registered tree plantings, and Canberra's heritage listed housing precincts. These precincts include both inner south and north Canberra as follows:

- Barton Housing Precinct
- Braddon Housing Precinct
- Corroboree Park Housing Precinct
- Wakefield Gardens Housing Precinct
- Alt Crescent Housing Precinct
- Early Canberra Brickworks Housing Precinct
- Blandfordia 4 Precinct, Forrest
- Blandfordia 5 Housing Precinct
- Forrest Housing Precinct
- Kingston/Griffith Housing Precinct
- Red Hill Precinct
- Reid Housing Precinct

A common objective for these precincts is: *To conserve landscaped reserves and parks, and to conserve and reinforce the historical pattern of street trees consistent with early Garden City principles and contemporary social values.*

Although the ACT Government's website states that 'Parking on Nature strips and footpaths is illegal'

[www.accesscanberra.act.gov.au/app/answers/detail/a\\_id/1379/~/-/nature-strips](http://www.accesscanberra.act.gov.au/app/answers/detail/a_id/1379/~/-/nature-strips), this activity continues apace. Vehicular parking, imposing hard surfaces on verges, destruction of the grass cover to provide parking spaces, as well as inadequate protection of verge trees during building activity and gardens ringing verge trees, all cause damage to tree health. It does not conform with established heritage streetscapes.

It would, therefore, be appropriate not only to continue promoting 'positive community behaviour in relation to managing and protecting nature strips and other public areas' (see Strategy, Objective 5, 5.1.2), but actually enforcing this regulation.

To enable this, Access Canberra and the Heritage Unit need the capacity to respond in a timely manner to reports of illegal parking, damage to verges and trees. This requires increasing resourcing and the capability to levy appropriate fines. Fines should be based on cost of re-establishing the nature strip and tree damage and be imposed to serve as a deterrent.

Plot ratios in heritage areas are also being exceeded thus reducing permeable surfaces which impacts both on trees within private properties and inevitably on street trees. To address this, consideration should be given to increasing the capacity of Access Canberra and the Heritage Unit to enforce the 'Conserving Landscape and streetscape value' Mandatory Requirements that state:

- Site coverage of built development (including the area of any dwelling, garage, carport, outbuilding or other roofed area but excluding driveways and unroofed paved areas) on a residential block shall not exceed 27.5% of the area of the block
- Not less than 40% of the area of a residential block shall be retained as planting area. Planting area means an area of land within a block that is not covered by buildings, vehicle parking and manoeuvring areas of any other form of impermeable surface and that is available for landscape planting.

We would also like clarification as to the status of registered and regulated trees, which comprise much of the urban canopy cover. The planning authority should consult with neighbours and the community before regulated or registered trees are removed.

We commend the facility of the ACT Tree Register but note the values in the Melbourne Case study cited in the Strategy do not include cultural heritage values. These are already included in the ACT Tree Register. We recommend using the terminology and meaning as defined by the Burra Charter and the costs, if such a mechanism was to be used, be adjusted accordingly – 'Cultural significance means aesthetic, historic, scientific, social or spiritual value for past, present or future generations' <http://amagawa.org.au/wp-content/uploads/2014/12/The-Burra-Charter-2013.pdf>.

## **2. Grow a resilient forest**

Selection of replacement tree species needs careful attention. In heritage areas, this can be contentious. However, the cumulative effects of climate change should still be one of the guiding principles. In many cases, a similar and more resilient species should be considered as there is little point in investing in tree species that cannot adapt to the predicted intensity of climate variability.

Some tree species in heritage precincts are now considered invasive species (see: Pest Plants and Animal (Pest Plants) Declaration 2015 (No1) (<https://www.legislation.act.gov.au/di/2015-59/notification.asp>). These include *Pinus radiata*; *Celtis australis*; *Robinia pseudoacacia* and various *Cotoneaster*, *Populus* and *Pyracantha* species.

The provisions of heritage precincts' Entries into the ACT Heritage Register allow the Authority under 'Requirements subject to the discretion of the Authority' to make decisions for replacement species under various considerations, for example:

- Where trees occur in an historical formal arrangement, the original alignments, spacings and species (including patterns of species variation)

should be retained, with trees being replaced where missing or in a declining or hazardous condition

- Where trees occur without a definable arrangement or pattern, the general character of the planting should be conserved where it enhances the landscape character of the precinct
- Non-original trees that do not complement the pre-1940 species or patterns should be removed
- 'Environmental Weeds' or pre-1940 trees where the species has not proven suited to the location may be replaced with an alternate species.

We would urge this be actioned with the guiding principle being to augment the unity of form in these heritage precincts, avenues and parks.

Regarding the use of science, both in terms of CSIRO modelling and engaging the community in data collection, we commend the intent to 'provide informed and appropriate maintenance and care' as we face the challenges of climate change.

### **3. Balance and diversify the urban forest**

The history of tree planting and selection of species is also worthy of consideration. In particular, the foundational work (noted in the Strategy, p. 16) of both Charles Weston – whose 'influence extends throughout the nation's capital and marks a significant development in Australian landscape architecture' based on scientifically-planned trials (<http://adb.anu.edu.au/biography/weston-thomas-charles-9054>) – and Lindsay Pryor is seminal.

Thus, while the Strategy (p. 36) notes that 'Our changing climate means that the species we have traditionally planted may not be suitable to withstand future conditions', many tree species chosen by Weston and Pryor have withstood severe droughts over some eight or more decades. In replanting trees in heritage places, this should be taken into consideration along with the work of the Fenner School of Environment and Society at the Australian National University when identifying resilient tree species that will 'retain and conserve the intrinsic features of the precinct. Hence, the following values attributed to heritage precincts and places need to be conserved:

- for their ability to demonstrate historical values including 'Garden City' planning principles and architectural and landscape design from the initial period of urban development within Canberra.
- for the aesthetic unity of the streetscapes arising from the harmonious integration of low-density built forms within a mature landscape setting, and high proportion of landscape space and trees; and
- for the social values associated with the retention of communal landscaped reserves and community facilities, whilst managing change to meet the contemporary requirements of residential usage.

We recommend therefore, that replacement should be done with regards to minimising impact on streetscapes. Under no circumstances should replacement of

all trees occur along streets occur, rather a succession plan be a carefully implemented over an appropriate timeframe and in consultation with residents. It is also to be noted that heritage-listed areas, obviously with their mature tree canopy, is notably cooler as outlined in CSIRO's report on *Mapping Surface Urban Heat in Canberra*

[www.environment.act.gov.au/\\_data/assets/pdf\\_file/0005/1170968/CSIRO-Mapping-Surface-Urban-Heat-In-Canberra.pdf](http://www.environment.act.gov.au/_data/assets/pdf_file/0005/1170968/CSIRO-Mapping-Surface-Urban-Heat-In-Canberra.pdf)

The Strategy cites the Melbourne Case Study tree removal approach to reckoning the value of a tree as follows:

A – Removal costs: Amounting to the fees incurred by Council for physically removing the tree.

B – Amenity value: Calculated in accordance with Council's Amenity Formula.

C – Ecological Service Value: Calculated in accordance with the i-Tree valuation tool.

D – Reinstatement Cost: Calculated in accordance with the greening required to replace the loss to the landscape incurred by the removal. (the Strategy p. 12).

We would add to this list the importance of cultural significance as defined by the Burra Charter: 'Cultural significance means aesthetic, historic, scientific, social or spiritual value for past, present or future generations' <http://amagawa.org.au/wp-content/uploads/2014/12/The-Burra-Charter-2013.pdf>.

This is of vital importance when protecting trees of intrinsic value to Aboriginal groups in the ACT.

#### **4. Objective 4: Take an ecological approach and support biodiversity**

Such an approach is to be commended. There are also opportunities to create assistive corridors particularly with succession management and intelligent selection of tree and other plant species for planting along roads, in parks, wetlands and even in backyards. Even understories of appropriate species would assist connectivity throughout Canberra's suburbs and even in large spaces such as the Arboretum. These corridors could greatly assist the sustainability of our fauna, which, as the Strategy states (p. 42), can 'enhance a diversity of habitat and resources for insects, bees and wildlife through considering flowering times and nectar/pollen/fruit and forage characteristics of different tree species'.

We note that this Strategy has been developed in conjunction with the ACT Planning Strategy 2018, ACT Climate Change Strategy 2019-2025 and the Living Infrastructure Plan. The Urban Tree Strategy could also provide vital connectivity with both the ACT's Native Grasslands

[www.environment.act.gov.au/\\_data/assets/pdf\\_file/0010/1156951/Grassland-Strategy-Final-WebAccess.pdf](http://www.environment.act.gov.au/_data/assets/pdf_file/0010/1156951/Grassland-Strategy-Final-WebAccess.pdf)) and Woodland Conservation Strategy

[www.environment.act.gov.au/\\_data/assets/pdf\\_file/0003/1444098/Woodland-Conservation-Strategy.pdf](http://www.environment.act.gov.au/_data/assets/pdf_file/0003/1444098/Woodland-Conservation-Strategy.pdf)).

It would be commendable if these strategies and their respective Action Plans were aligned to achieve best practice in connectivity.

**Objective 5: Develop infrastructure to support the urban forest and liveability**

This Strategy requires significant resources for effective implementation. As stated, there is a fundamental need for an increase in permeable surfaces to support tree growth, soil hydrological processes, maintenance of water quality values across the urban area, and city infrastructure that supports a healthy canopy. This necessitates various engineering responses and changes to planning regulations. New plantings should follow the latest scientific information for better tree growth including space and depth of soil, monitoring tree health, monitoring environment health and adjusting management strategies according to the evidence resulting from these actions. Further, it is to be noted that Melbourne Council provides watering exemptions for heritage situations (Ely 2010).

This must be an integrated and coordinated approach with adequate resourcing for urban tree management in tandem with education and the enforcement of legislation and regulations factored in if sustainability is to be achieved

**Objective 6: Partner with the community**

This objective is to be commended and, with the provision of scientifically based resources forming the basis for an education program for volunteers, should assist increasing the community's understanding, appreciation and knowledge of the vital role trees play in our lives.

Adequate resourcing for the many volunteer environmental community groups will need serious consideration.

A final recommendation is that a framework be developed to evaluate the implementation of this Strategy. This evaluation framework needs to form the basis of regular reviews of the program to gauge progress and adjust when necessary.

Yours sincerely.



Gary Kent  
President

10 September 2020