



Australian Native Plants Society Canberra Region Inc

P O Box 217 Civic Square ACT 2608
ABN 17 717 346 075
nativeplantscbr.com.au

The Manager
ACT Urban Forest
Email: communityengagement@act.gov.au

7 September 2020

Dear Manager

RE: DRAFT URBAN FOREST STRATEGY SUBMISSION (DUFS)

Australian Native Plants Society Canberra Region

The ANPS was established in 1962. ANPS is a non-profit, voluntary community organisation dedicated to the growing, conservation, preservation, promotion and appreciation of Australian native plants. ANPS has over 270 members, including many working in a professional capacity in many spheres related to native plants (e.g. ecology, botany, horticulture and entomology) as well as other closely related scientific disciplines. ANPS also has a large number of members that actively participate in society activities.

The ANPS constitution prominently advocates activity in conservation through the promotion of the conservation of Australian plants and their habitats, and observing and support for requirements under State, Territory and National laws related to the preservation of Australian native plants and ecosystems.

We have reviewed the DUFS for the preparation of this submission. ANPS recognises that urban areas and the urban forest offer all the benefits as stated in the Strategy, especially environmental benefits related to wildlife (in a similar way to dedicated nature reserves), and that the urban forest is capable of being utilised and managed for wildlife sustainability purposes. The greater use of native vegetation is an appropriate means of achieving this.

1) Objectives

Objective 1: Protect the urban forest

ANPS agrees a resilient and sustainable urban forest is a necessary aim, and solid protection of the urban forest we have is the first necessary step.

The DUFS states that the Tree Protection Act (TPA) “...*only applies to regulated trees on private (leased) land once they have met a set of criteria that is currently set at an insufficient threshold.*” ANPS is unable to comment on this statement as you also state that “...*the criteria are being reviewed to ensure we are protecting the right trees for our future urban forest, and ensuring the criteria for removal are appropriate and in line with community expectations.* We presume this review of criteria is related to advice from submissions received through the review of the TPA. ANPS made some comment on this issue in its submission to the review of the TPA. These were primarily related to regulated trees in backyards and the protection of verge trees damaged by parking vehicles on verges. These matters are dealt with in other

sections of this submission. While there appears to be reasonable advisory communication between the Conservator and the planning agency, the latter almost invariably overrides this advice. A major issue is new developments on leased land. We are not very good at keeping buildings for any length of time. Relatively young buildings, 40-60 years old, are torn down to be replaced with regular frequency. Besides this being bad for overall sustainability, perhaps there should be greater consideration of buildings being rejuvenated for new purposes, or new buildings having to fit original building footprints. If this does not happen, trees in green spaces associated with these buildings are removed before they have realised their life expectancies, only to be started off again with new plantings.

ANPS agrees that trees on public land require addressing in a more serious way under the Public Unleased Land ACT (PULA). We agree with the PULA being reviewed to ensure our public trees are appropriately valued and protected, and support consideration being given to requiring financial bonds on trees on unleased lands, especially where development activity is to undertaken.

Objective 2: Grow a resilient forest

It is obvious that public funding will have to be the mainstay of planting and maintaining the urban forest. While consideration of “...ways to leverage private and business contribution in a sustainable way...” is a worthy goal, past experience indicates this may be difficult. Developers in particular appear to want or need to operate only on blocks taken back to mineral earth, and we think this illustrates how much this private sector is concerned about trees. However, there may be other private business sectors that may be interested, so would support any attempts to include the private sector.

ANPS agrees that climate change may mean that some species traditionally planted species may not be suitable to withstand future conditions. For native species we may well have to look to species or genotypes from further inland (western slopes and plains) as part of future planting programs. Post-planting care will most assuredly be needed for a longer period, and this may be where community input may be beneficial.

Objective 3: Balance and diversify the urban forest

ANPS agrees that suburban planning over recent decades has created difficulties in establishing tree cover. Parts of Gungahlin has shown this to be the case, with aerial views of the first established suburbs revealing poorer tree cover than older suburban areas. ANPS acknowledges that to make the city more sustainable, higher population density is a necessary step in reducing urban spread and make the city work more efficiently. With the reduction in width of street verges and the presence of utilities/services, perhaps native large shrub species may be a solution for some sites. Even better, allowing for wider public street verges may be a solution, even if leased block size remains small.

A greater diversity of species appropriate for our climate is necessary and was addressed above.

There is no doubt that many streets have been planted using the same species to give a sense of continuity, and this has provided some wonderful streetscapes in many older suburbs. However, ANPS does support the goal of a more site-specific planting approach in the future.

Objective 4: Take an ecological approach and support biodiversity

We particularly support this objective. If Canberra is to become a more sustainable city, an ecological approach to planting is a very significant step to achieve this. While exotic trees

provide for movement, shelter and a degree of food sources, they are not as beneficial as native plantings. There are many areas within Canberra (e.g. open spaces, flood plains and urban buffers) that could be better utilised with appropriate native tree/large shrub and “island” plantings. There are exceptions, such as where natural grasslands occur, and which must be conserved. However, there are other areas that were planted with exotic species, some of which are now recognised as invasive species (e.g. White Poplar, Lombardy Poplar). As these trees age, they should be replaced with native species suited to the site, thus providing a better standard and continuum of corridors within and through the urban areas. ANPS acknowledges that unplanned fire is a consideration, but with appropriate choice of species and spacing, there is no reason why such immediate plantings and/or gradual replacement plantings cannot occur.

ANPS contributed to the preparation of the nomination of “*Loss of Mature Native Trees (including hollow-bearing trees) and a Lack of Recruitment*”. We therefore support any and all actions to conserve and maintain such trees.

While we agree that significant benefits are realised when “...existing dryland grass surrounding remnant trees are replaced with native understorey plants, large rocks and branches to improve tree health, increase wildlife habitat and attract more birds,”, we suspect that there will be various views on this within the community, and many obstacles to achieve this. We strongly support the intent, but also recognise this would have to carefully implemented on a site by site basis, with unplanned fire being a major consideration.

ANPS supports examining the potential for “no-mow” zones to allow natural regeneration, especially near nature reserves. Mowing has been a very significant vector in spreading weeds (e.g. Chilean Needle Grass and African Love Grass) across the city, despite all the recommended wash-down and other recommendations provided to, and expected of, mowing contractors. If such zones are established, invasive species management programs will need to be sustained in these zones.

The urban forest can contribute greatly to the enhancement of habitat and resources for wildlife, especially pollinator species such as bees and other insects and birds. The loss of pollinators through the use of catastrophic pesticides must come to an end. An example is the use of systemic, long-lasting neo-nicotinoids and similar systemic pesticides. Using these pesticides on any scheduled basis to keep what are basically ornamentals (e.g. *Ulmus* sp.) in an acceptable condition is fraught with danger. We have been in contact with our colleagues in ACT for Bees, and completely support their submission to the DUFFS.

For sustainability reasons, the ANPS fully supports the re-use of any by-products from the end-of-life materials of the urban forest, in whatever form.

Objective 5: Develop Infrastructure to Support the Urban Forest and Liveability

ANPS agrees that infrastructure development and requirements have a significant impact on tree health and survival. We addressed the need for permeable surfaces on nature strips, thus enabling water infiltration and reducing run-off in our submission to the review of the TPA. If the unauthorised use of nature strips for parking is not to be enforced, then there is no logical reason why the government should not, at the resident’s cost, require water permeable platforms capable of avoiding compression to be installed. ANPS is not against authorised understorey plantings being permitted on nature strips, provided they do not restrict road sightlines, contain invasive species or have damaging impacts on verge trees.

The planning for the width of road verges and installation of new underground services in new suburbs was addressed earlier. As stated, we automatically think of trees in verges, but recognise the limitations where services are an issue. Large shrubs should be considered in these circumstances.

The re-use of dead trees in nature playgrounds is beneficial, but re-use of hollow trees in nature reserve area is also useful for biodiversity purposes.

Objective 6: Partner with the Community

ANPS supports any efforts for the community to contribute to maintenance of our urban forest. This is addressed further in section 5) below. While the community may be able to assist in education about the urban forest, this will need to remain resourced by government by ensuring the community is kept informed about their (the communities) role in protecting and supporting the urban forest.

2) Legislative Frameworks

ANPS supports the legislative framework(s) established to protect the urban forest, most especially for registered/heritage listed examples.

The one misgiving we have is on regulated trees within backyards. ANPS addressed this issue in our submission on the review of the Tree Protection Act conducted in the recent past. Backyards are an essential part of living space in urban areas. This is especially so as the area of urban blocks have decreased over recent decades. There can be substantially valid and reasonable requests to remove trees from backyards for a variety of reasons, and the government should develop a secondary set of investigative criteria for such instances.

3) Policy Context

ANPS agrees with, and is supportive of, the policy context provided.

We have just one comment as related to “Planning” and “Transport” where it is stated that “... *people will live and use active travel routes that the urban forest should provide amenity and support transport choices*”. This is not very clear, but ANPS agrees that transport corridors do offer opportunities for urban forest plantings. While ANPS is very supportive of native species being used in transport corridors, a number of our members have some concerns about the use of *Eucalyptus mannifera* in some locations along the light rail route. We are surprised this species was accepted through the planning process. In many locations this species has been used in close proximity to the light rail overhead power supply. It is unlikely that the 50-70 years of useful lifespan of this species will be reached without incident due to increase in the risk of power outages due to limb drop as the trees age. Species from the genera *Callistemon*, *Melaleuca* or *Hakea* would have been more suitable for these sites.

4) Species diversity

ANPS agrees that diversity of species in the urban forest is essential for resilience from disease, pests and climate change. There are many local and regional native species which could be used to increase the diversity of the urban forest.

5) Community coordination and education

There is no doubt that community groups provide an invaluable service to many aspects in the life of our city, and is to be encouraged and supported. It is necessary to provide adequate training and resources to the community as part of the potential contribution they may make, and to maximise it.

In the case of the urban forest, there is no reason that appropriately trained volunteers could not provide a service, especially on a neighbourhood or suburban basis. There are many minor pruning activities they could undertake e.g. removal of small adventitious shoots on trunks, a common problem with many *Quercus* sp.; early formative pruning (with appropriate training) as new plantings grow; arranging watering of new plantings and for established planting during dry periods and droughts; submitting reports on pests or disease outbreaks or larger structural/breakage issues that need more professional attention to name a few.

However, it is important that community inputs are not seen or relied upon as part of urban forest management such that asset management and maintenance budgets are reduced. Any community input should be what they are - an “extra” contribution.

It is also necessary that the government itself needs to take action where legislative requirements to protect public assets are available but not enacted. The statement that “...many *Canberrans* may not be aware that parking on street verges is prohibited as it damages the root systems of trees and shortens their lifespan.” was used as an example in the DUFS. ANPS is not convinced this is the case, and many residents are fully aware of the damage caused by verge parking and the legality of verge parking. ANPS addressed this issue in our submission to the recent review of the Tree Protection Act. If the government itself has developed, in conjunction with the community, legislation which has made verge parking illegal, it behoves them to undertake the necessary education over a period of time, gradually leading to observance by enforcement measures necessary to protect the public asset involved. While there may be some opportunities for any community contribution to assist with education of other residents on such issues, especially within their own neighbourhoods, they should not be expected to address what are legal matters due to the potential for conflict situations.

6) Challenges

6.1) Climate Change

We appreciate the awareness of the ACT government of climate change and its actions on climate change.

The predication of warming weather and more frequent droughts will have impacts on many species currently grow in our region. There are obvious good reasons for increasing diversity of species in the urban forest, and climate change may mean the future climate will become more suitable for native species (including clones of species that naturally occur in the ACT) to the west of us which are more resistant to dryer and extended drought conditions.

Climate change will certainly impact on the establishment of new plantings – this may well be a task where the community may assist with watering programs and formative pruning.

6.2) Urban densification

This is addressed in various places in the Objectives 1-6 above.

6.3 Loss of habitat

Development does not have to mean a significant threat to biodiversity. Good planning can overcome this, especially as far as connectivity is concerned. This issue to addressed in places in Objectives 1-6 above.

Again, ANPS, was one of the community groups contributing to the preparation on “*Loss of mature native trees (including hollow-bearing trees) and lack of recruitment*”. The Conservation Advice on this Key Threatening Process recommends the retention of standing dead trees wherever possible and encouraged retention of non-mature native trees across urban and rural landscapes to ensure a future supply of mature trees to avoid lag times. We need to ensure that where native trees on connective corridors are planted, that they are secure enough over the long-term to reach maturity.

In conclusion, ANPS recognises the valuable work the ACT government is achieving with the urban forest. We thank you for the opportunity to comment on the DUFS. ANPS is happy to be further contacted on any aspect of this submission.

Yours sincerely



Geoff Butler
Conservation Officer
for
Lucinda Royston
President