

HAROLD ROSSITER RESERVE COMMUNITY ACTION GROUP



Harold Rossiter Reserve Community Action Group
PO Box 1256
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Town of Victoria Park
99 Shepperton Road
Victoria Park WA 6100

Attention: Brendan Nock, Environmental Officer
By email: admin@vicpark.wa.gov.au
bnock@vicpark.wa.gov.au

Dear Brendan

FEEDBACK ON DRAFT URBAN FORESTS STRATEGY

Introduction

The Town of Victoria Park (ToVP) has a tree canopy cover that is currently less than 10% of its land area. This is significantly less than is required for a healthy urban environment. Consequently, in response to community concerns, an Urban Forest Strategy (UFS) has been drafted by Council (in conjunction with the Vic Park Collective, Vic Park Trees and other parties) to increase the canopy cover within the ToVP to 20%.

The Harold Rossiter Reserve Community Action Group (HRRCAG) hosts more than 1,000 members and was originally formed in 2017 to engage with Council on the proposal to establish a synthetic hockey turf on Harold Rossiter Reserve. Boasting significant membership experience in community health, passive incidental and active exercise science, environmental science and biology, sustainable urban design and civil project management, the HRRCAG has committed to engage with ToVP stakeholders on policies and practice which impact on community health and well-being through the preservation and growth of unrestricted parkland space supporting principally passive use activities. The HRRCAG welcomes the opportunity to review and provide feedback on the draft UFS. We look forward to being part of future refinement of the UFS and its implementation.

UFS Summary

The ToVP has a total land area of 17.9 km² and, in 2016, had a tree canopy cover of around 1.8 km² (10% of that land area). Given the amount of development that has occurred within the ToVP since 2016, the amount of canopy cover is now <10%. This is significantly less than is required for a healthy urban environment. Consequently, an UFS has been developed to increase the canopy cover within ToVP to 20%. To support this goal, the UFS identifies six strategic outcomes, as follows:



1. Plant and protect sufficient trees by 2020 to achieve a 20% tree canopy target.
2. Maximise community involvement and collaboration.
3. Increase tree diversity whilst favouring local endemic and Western Australian species that also support wildlife.
4. Maintain high standards of vegetation health.
5. Improve soil and water quality.
6. Improve urban ecosystems.

To achieve the UFS goal and these outcomes, there is a need to (a) protect and manage existing trees and (b) plant at least 256,000 more trees to provide an additional 1.8 km² of canopy cover. It is envisaged that the mass planting will occur on:

- land managed by Council including river foreshore within the ToVP boundaries, public parks and reserves, stormwater sumps and other Town assets;
- land held by public and commercial landowners and tenants; and
- private land (mostly residential).

The success of the UFS depends to a large extent on the ToVP's ability to build partnerships with public, commercial and private landowners and developers. Key to UFS implementation is a process known as Asset Based Community Development (ABCD). Under ABCD, community members are considered to be co-creators of change and initiatives. It relies heavily on the resources, capacity, strengths and aspirations that the community is willing to give to realise opportunities.

The UFS details the benefits of a healthy and sufficiently-sized tree canopy from environmental, economic and social perspectives. It also describes the challenges that must be overcome to see the strategy implemented effectively (density and competition for space; climate change; water; pests and diseases; costs; and social attitudes/culture change). Recognising these benefits and challenges, the UFS goes on to suggest a number of actions to be undertaken by Council, community groups and willing commercial landowners to achieve the goal of 20% canopy cover. These are summarised in Attachment A.

Key Comments and Feedback from the Harold Rossiter Reserve Community Action Group

Overall, the UFS is a positive and welcome progression towards improving community health and ecosystem services within the ToVP. It is encouraging to see the level of community engagement and input to the process of developing the UFS. The HRRCAG also has a number of concerns and questions regarding the draft UFS. The HRRCAG feedback is provided below.

- The UFS document is information-dense and provides significant detail on a range of interesting and relevant topics. The background information is useful and provides context, and it's clear that a lot of research and benchmarking were conducted to inform Strategy development, but inclusion of such a large volume of information within the body of the report makes it difficult to distil the key elements of the UFS. The document would benefit from a revised and succinct Executive Summary that captures the key elements of the UFS and includes a summary table of outcomes/targets/suggested actions such as the one provided as Attachment A.
- The Executive Summary states that the UFS comprises the Strategy document and a tree matrix. It appears that matrix was not included in the Strategy document, but it is a key component of the UFS. When will the matrix be provided for review?



- The HRRCAG notes a small error in the pie chart presented as Figure 12 where the percentage of “other” species should be 51% (not 11%). Further, the sentence describing this pie chart (p31) should read “Just under half of the Town’s street trees belong to just 10 species...”. The HRRCAG also notes that non-indigenous taxa are included in the current list of street tree species (Figure 12). The HRRCAG supports an increase in the diversity of species used as street trees, providing that these species are indigenous to our area and tolerant of the conditions in which they are expected to grow. In particular, the inclusion of species utilised by black cockatoos should be encouraged.
- While the HRRCAG understands that the actions proposed to achieve the strategic outcomes need to occur within the ToVP, particularly as it is expected that these will be achieved primarily through ABCD. However, the importance of integrating our UFS with environmental and community management plans from adjacent jurisdictions appears to have been ignored in the UFS document. Our urban forest plays an important role in regional social and natural ecology, particularly in relation to black cockatoos, beyond the boundaries of the ToVP and this should be discussed and addressed in the UFS. Further information in this is provided in Attachment B.
- The document states that the UFS will complement the ToVP’s existing land management programs including the Kensington Bushland Management Plan, other ToVP plans for parks, the Climate Change Mitigation and Adaption Plan and the forthcoming Public Open Space Strategy (p26). However, no further information is provided in relation to the relationship between the UFS and these documents. How well does the UFS align with, and complement, these plans and the Public Open Space Strategy? How will any misalignment and conflict be addressed?
- Section 3 notes that total canopy cover in the ToVP was 10% in 2016, but that considerable loss has occurred since then due to development with the Town (p11). What action is Council planning to obtain an accurate baseline for canopy cover? An accurate baseline is required to determine the number of trees needed to achieve the target of 20% (plus a contingency allowance).
- Further to the above and considering the significance of the environmental asset involved, the HRRCAG seeks a much stronger and integrated plan for development of the Kensington Sand Pit with significant relevance to, and planned integration with, the adjacent Kensington Bushland and Harold Rossiter Park.
- The Executive Summary states that a canopy cover of 10% of land area is significantly less than is required for a healthy urban environment. However, the HRRCAG was unable to find where in the document it states what canopy cover is required to achieve a healthy urban environment. Consequently, it’s difficult to know how far a target of 20% will get us towards that goal. Further information on what constitutes a healthy urban environment would also be useful in providing additional context for the benefit of trees and the outcomes expected to be derived from the UFS.
- The relevance of some of the benefits of trees outlined in Section 5 needs to be revised to be specific to the UFS and the ToVP. For example, food security seems to have little relevance as no human food production species have been included in the UFS mass planting list. Further, there is reference to the effect of trees on land and property values in Sydney, but no data are



provided for Perth, let alone the ToVP. In addition, what is meant by “good quality biodiversity” in relation to the ToVP? The HRRCAG notes that the Perth metropolitan area is not included in any of our national biodiversity hotspots as described by the Federal Department of Environment and Energy (<http://www.environment.gov.au/biodiversity/conservation/hotspots/national-biodiversity-hotspots>) though the conservation value of the Kensington Bushland and Harold Rossiter Reserve is well documented (see, for example, Attachment B). To weigh up the benefits and costs of UFS implementation, stakeholders need to be provided with locally relevant data.

- We are concerned that a number of the suggested outcomes/actions defined in Section 10 are aspirations and not targeted, and that some of the strategies/actions are not relevant to Urban Forest deliberations. Further, the implementation of an incentive scheme with rate credits seems to have been excluded from the action list.
- The UFS document identifies potential for education and tourism benefits arising from showcasing what can be done in one of the most biodiverse metropolitan areas of the world (suggesting that the ToVP would become an example of this). What biodiversity measures for the ToVP were or will be used to support this statement? It seems to be a stretch goal given that the mass planting will focus on tree species with no mid-storey or understorey species included.
- The UFS document identifies the future potential for the TOVP’s urban forest to become a source of income through carbon offset farming and other initiatives (p17). However, this opportunity has not been included in the UFS outcomes, targets or suggested actions. What actions are planned to investigate these opportunities? As the majority of the funding for the UFS mass planting and other actions will be provided by community and other non-ToVP parties (as part of ABCD), how will income derived from such programs be directed to the community?
- The HRRCAG is also concerned that there is more emphasis on forest development on private land/verges than on the use of public and parkland spaces as opportunities to achieve significant canopy increases on private land may be more limited than currently anticipated (particularly given the projected population increase for the ToVP). However, the impact of increased plantings on the use of parklands and other areas for passive recreation and other uses including sport needs careful consideration and further elaboration. While we generally support increased plantings, the recent community debate regarding potential locations for a synthetic grass hockey facility within the ToVP illustrates the pressure that our public open space is under to accommodate multi-user activities.
- The Executive Summary correctly identifies the main challenges to success of the UFS as being Council’s ability to vary existing models of urban density development and resourcing a mass tree planting program based on a genuine ABCD approach to urban forestry (p8). However, another significant concern identified in the Introduction (p12) is Council’s ability to build partnerships with public, commercial and private landowners and developers. The latter is included in the actions listed for Outcome 2, but there is little information on how partner organisations would be identified, how these partnerships would be developed, Council’s expectation of its partners, etc. Partnering is very different to other forms of engagement and Council does not yet have a strong record of partnering with Community Based Organisations (CBOs). Given the importance of effective partnerships with CBOs and other parties to success of the UFS, further information should be provided in this regard.



- Section 6 provides a good summary of key challenges to urban forests relevant to the ToVP. However, further information is required in relation to the expected effectiveness and efficiency of the proposed mitigation measures. For example, this section identifies the ABCD approach as a way of significantly reducing the \$384M cost of the mass planting program and ongoing maintenance (p27). However, Section 3 (p12) states that the “bulk of this cost is watering”. On this basis, how much of the cost of UFS implementation will the community (including ratepayers) be expected to bear? This expectation needs to be clearly defined as cost-sharing arrangements are critical to success of this Strategy.
- Implementation of the UFS relies heavily on ABCD. Under a traditional framework for ABCD, community members are considered to be both creators and implementors. The ToVP should be commended for the proactive engagement of community in development of the UFS. However, the HRRCAG is concerned that there will be a shift from the community being seen as collaborators and co-creators, to simply being a resource base from which to draw labour and other inputs. In particular, the HRRCAG is concerned that the ToVP’s expects that ABCD will “significantly reduce costs” [to the Town] simply by passing these to the community. If the community is unwilling and/or unable to absorb these costs, the UFS will not be effective. There is a need to quantify cost-sharing arrangements and to assess the willingness and ability of the wider community to support realisation of the opportunities identified in the UFS.
- Implementation of the UFS will require significant behaviour change from property owners and developers in regards to their rights when dealing with trees as well as a change in opinions. Fostering sustainable behaviours and mindsets can be difficult to do for a range of reasons. To be effective, behaviour change needs to be led by example (“following the herd” and local herds at that) and this is difficult to do when there are few local examples included in the document.
- The HRRCAG commends the recommendation that the UFS Implementation Working Group be independent of the existing Council committees and to have broad representation (including our local Noongar and Whadjuk community) (p65). As a group that represents more than 1,000 local residents and that takes a keen interest in the interface between environment and community to enhance community health, the HRRCAG is keen to be involved in the Implementation Working Group. Please contact us to discuss ways in which we can be involved.
- The HRRCAG commends the recommendation for the existing UFS Working Group to continue in a transitional role to facilitate development of the Implementation Working Group (p63). The HRRCAG also commend the inclusion of wider stakeholder engagement and development of partnerships with users of public parks. As a community organisation that originally formed to assist in care for the Harold Rossiter Reserve, the HRRCAG now takes a broader view on community health relevant to open passive use parkland space within the ToVP. The HRRCAG would welcome engagement in the next phases of UFS development including active involvement with the UFS Implementation Working Group and in implementation of the Strategy.



- The HRRCAG notes that the indicative UFS Implementation Working Group responsibilities include monitoring progress towards attaining the UFS' goal of 20% canopy coverage by analysing annual mapping data (p65). This will be a useful metric, but we respectfully suggest that a range of Key Performance Indicators be developed to address all of the outcomes defined for the UFS and assess progress in relation to the actions implemented to achieve these outcomes.
- Further, the HRRCAG notes that the indicative UFS Implementation Working Group responsibilities include development of a sustainable Urban Forest Management Plan once the 20% target has been achieved. Given the length of time that is likely to elapse between planting and development of full canopy, the HRRCAG suggests that development of this plan commence much earlier than this.

Thank you for the opportunity to provide our comments and feedback on the draft UFS. The HRRCAG looks forward to further engagement opportunities with the ToVP on this important initiative. In the interim, please do not hesitate to contact Matthew Finucane-Woodman (matthew.finucane@biosenv.com.au) or the undersigned if you have any queries regarding this response letter or would like to discuss our comments further.

Yours faithfully

HAROLD ROSSITER RESERVE COMMUNITY ACTION GROUP

A handwritten signature in black ink that reads "John Mamo". The signature is written in a cursive style.

Professor John Mamo on behalf of the HRRCAG Executive



Attachment A: Summary of UFS Strategic Outcomes, Targets and Suggested Actions

Timeframes for suggested actions are:

- S = short term (up to five years)
- M = medium term (5-10 years)
- L = long term (beyond 10 years)

Strategic Outcome	Description	Target	Suggested Actions
<p>1. Plant and protect sufficient trees by 2020 to achieve the 20% tree canopy target as supported by Council.</p>	<p>The goal of this outcome is to have sufficient trees planted by 2020 to achieve a 10% increase in canopy cover (trees over 5m tall) over the long term.</p>	<p>Protect existing trees on public and private land and plant enough trees by 2020 to allow 20% canopy when the trees have matured.</p> <p>A staged implementation plan will be developed and may include separate targets and actions for different land use zones and densities. As an example, a higher tree canopy target in parks and other open spaces would help to offset low canopy cover in more built up areas.</p>	<p><u>Public Land</u></p> <ul style="list-style-type: none"> • Develop and resource an effective mass tree planting implementation plan over the continuous life of the UFS, using ABCD methods. (S) • Establish policies to protect existing trees on public land and help new trees to reach maturity; for example, effective street tree bonds and appropriate penalties for removal or vandalism. (SML) • Incorporate tree protection and maximise planting in all projects on public land, especially Town-owned parks, verges and open spaces. At the onset of any proposal for significant public works, conduct and publish a benchmarked Tree Impact Assessment of proposed design, engineering plans or changes. (S) • Prioritise trees and vegetation in streetscape planning, traffic management (as appropriate) and urban design. (SML) • Develop a Town street tree strategy (SML) • Implement an 'opt-out' verge trees policy. (S) • Develop and implement a sumps vegetation project and collaborate with local community groups, State government agencies, SERCUL, and other stakeholders. (SM)



Strategic Outcome	Description	Target	Suggested Actions
			<p><u>Private Land</u></p> <ul style="list-style-type: none"> • Promote relevant changes to local and state development and planning rules to require open space and canopy trees on private property, particularly for 'battleaxed' blocks and new residential and multi-use development sites. (SML) This could include: <ul style="list-style-type: none"> ○ Variations to the R-Codes to allow for such things as deep root zones and variations to setbacks to allow space for trees on developed land. ○ Density/heights bonuses based on performance criteria that protect existing trees and enable new trees to be planted. ○ Design guidelines that support protecting and enhancing canopy cover on private land. ○ Exploration of more experimental land use mechanisms such as developer contributions, levies and hypothecated revenue streams. • Encourage voluntary compliance with a benchmarked Tree Impact Assessment scheme for new developments. Reward good practice. (S) • Establish a trial incentives programme to retain trees on private land, such as differential Council rates based on land use, green infrastructure and tree canopy, and funding to assist land owners to maintain significant trees. (SML) • Explore and develop effective penalties to deter unnecessary tree removal and clearing of development sites. (SM) • Strengthen and enforce local planning policy to require best practice tree planting and landscaping in non-residential car parks. (S)



Strategic Outcome	Description	Target	Suggested Actions
			<p><u>Other Suggested Actions</u></p> <ul style="list-style-type: none"> • Collaborate with other major land caretakers in the Town to increase tree planting and to establish a green corridors plan (see Strategic Outcome 6: Improve urban ecology). (ML) • Update and expand the Town’s significant and remnant tree register with amendments to increase penalties and incentives to protect significant trees. (M) • Foster community-based solutions, such as tree giveaways, Adopt-A-Verge, community planting days and community gardens. (SML) • Maintain a Town register of net gains and losses, to be published in conjunction with annual mapping data. (S) • Design and trial a new planning policy to assign a minimum tree canopy loading per resident for all new developments in the Town, whether large or small, on public or private land. The current benchmark of 49 m² of tree canopy per resident is proposed as the minimum standard. This canopy could be supplied on the development itself, through retention of mature trees or new plantings onsite or in other locations within the Town. (SM)
<p>2. Maximise community involvement and collaboration</p>	<p>Centralise and integrate grassroots group activity related to greening activities.</p>	<p>The local community will be engaged with the UFS and will be more closely involved in greening activities within the Town.</p>	<ul style="list-style-type: none"> • Consult and collaborate with community groups, private landowners, businesses and other stakeholders (local, national and global) to deliver innovative urban forest solutions (for example, public land tree planting licenses and stewardship). (SML) • Partner with key community stakeholders to create and build the capacity of local urban foresters to plan, plant, maintain and record implementation of the strategy. (SML) • Work with Whadjuk Noongar traditional owners to develop community programmes that increase knowledge about the cultural significance of landscapes, flora and fauna in the Town.



Strategic Outcome	Description	Target	Suggested Actions
			<p>(SML)</p> <ul style="list-style-type: none"> • Join with other LGAs and government agencies to deliver programmes and strategies that support the UFS. (ML) • Conduct a strong public information campaign to promote the UFS and encourage community participation. (S) • Develop and deliver a local schools education programme focused on the UFS goals and actions. (SM) • Investigate establishing an Environmental Resource Centre at the Kent Street Sand Quarry or other suitable site. (L)
<p>3. Increase tree diversity, whilst favouring local endemic and West Australian species that also support wildlife</p>	<p>The diversity of species chosen will lower the risks to the canopy as a whole when facing adverse conditions and pathogens as well as improve biodiversity for the urban ecosystem.</p>	<p>There shall be a tree diversity policy for the Town's public urban forest and guidelines for private land, based on data from regular tree audits (see Strategic Outcome 1). A staged planting programme will be implemented to adjust the mix of trees to achieve these diversity targets over the long term.</p>	<ul style="list-style-type: none"> • Implement use of a Town tree matrix to achieve agreed tree diversity guidelines, including annual review and update. (SM) • Secure a reliable supply of high quality local endemic and West Australian plant stock. (S) • Revise verge and street tree planting guidelines to increase diversity. (S) • Establish protocols for increasing understorey and ground cover planting in public parks and other planted areas to encourage healthy ecosystem promoting wildlife. (S)
<p>4. Maintain high standard of vegetation health</p>	<p>Maintenance of current good condition of existing canopy trees using both professional services and citizen science.</p>	<p>No less than 90% of the Town's urban forest will be maintained in good health.</p>	<p><u>Improve Tree Health</u></p> <ul style="list-style-type: none"> • Reduce the number of stressed trees and vegetation through careful management. (SML) • Ensure that trees are planted and cultivated in the best conditions possible. (SML) • Select good stock and species that are resilient to the effects of climate change, pests and diseases. (SML)



Strategic Outcome	Description	Target	Suggested Actions
			<ul style="list-style-type: none"> • Continue with dieback treatment trials. (SM) • Provide advice and support to private land owners and caretakers. (S) <p><u>Monitoring</u></p> <ul style="list-style-type: none"> • Conduct yearly GIS mapping and analysis of the urban forest. (SML) • Conduct targeted arborist checks; annually in problem areas as identified by GIS mapping, and Town-wide checks every three years. (SML) • Establish a citizen science programme to assist the Town with on-ground data collection and provide training in detecting common pathogens and to prevent the spread of Asian woolly hackberry aphid and white cedar moth. (ML)
5. Improve soil and water quality	Using plant choice to influence water retention.	Develop and employ benchmarks that ensure soil moisture is maintained at levels that support healthy vegetation, water quality and effective flood and water resource management.	<ul style="list-style-type: none"> • Employ and encourage best practice soil and water management and monitoring across the Town, including an improved hydrozoning protocol for passive and active land uses and ecozone planting on Town land. (SML) • Continue WSUD approach in managing Town’s storm water runoff water and establish WSUD as the minimum design standard for Town-managed projects. (SML) • Review storm water infrastructure capability to maintain and improve soil and water quality. (SM) • Explore options for planting native sedges in Town sumps. (SM) • Install alternative or temporary watering systems (for example, portable water tanks) in suitable locations. (SM) • Minimise spread of dieback through the soil, in line with the Town’s Dieback Management Procedures and Protocols. (SML)



Strategic Outcome	Description	Target	Suggested Actions
6. Improve urban ecosystems	Traditional environmental issues.	Protect and enhance biodiversity, green infrastructure and green corridors that contribute to a healthy urban ecosystem.	<ul style="list-style-type: none"> • In collaboration with relevant research agencies and local stakeholders, review the Town’s Environment Plan and incorporate an Urban Ecology and Biodiversity Plan in which trees and vegetation are used to address environmental problems. (M) • Develop a Town street tree strategy. (S) • Update the Town’s Remnant Vegetation Management Plan. (S) • Develop a rehabilitation plan for the Kensington sand quarry and investigate the feasibility of establishing an Environmental Resource Centre on the site as a public information and action hub for urban ecology. (SML) • Using a collaborative approach with other landowners and caretakers, recreate green corridors throughout the Town to connect fragmented parcels of land that assist native fauna access and freedom of movement. Amend Town Planning Scheme and precinct plans accordingly. (L) • Expand bird nesting box trial and set up new habitat support trials for microbat boxes and insect hotels. (SM) • Develop a planter and parklet box policy for shop fronts. (S) • Develop a biophilic building design guide and implement trials, for example, roof top gardens and green walls, to inform and promote best practice in the Town. (M)