



**CONSERVATION  
COUNCIL**  
ACT REGION

## Submission to: ACT Government

# Urban Forest Strategy 2020-45

---

SEPTEMBER 2020

The **Conservation Council ACT Region** is the peak non-government environment organisation for the Canberra region. We have been the community's voice for the environment in the Canberra region since 1981. We work to protect our environment through advocacy, community engagement and campaigning.

We campaign to:

- cut greenhouse emissions
- protect biodiversity in our urban and natural areas
- protect and enhance our waterways
- reduce our waste and improve urban sustainability, and
- promote sustainable transport and planning for our city.

As the peak body, we advocate on behalf of and support our more than 45 member groups, which have a combined membership of over 20,000 people. We collaborate with Government, business and the community to advocate for the highest quality environment for Canberra and the ACT region.

**For further inquiries regarding this submission please contact:**

Helen Oakey  
Executive Director  
P: 6229 3202  
Email: [director@conservationcouncil.org.au](mailto:director@conservationcouncil.org.au)

## Introduction

The Conservation Council welcomes the development of the Urban Forest Strategy which provides an important opportunity to bring together recent research findings about the state of Canberra Urban Forest, existing planting commitments and legislative protection for trees in the ACT to create a comprehensive plan for protecting, restoring and building our urban forest into the future. The Urban Forest Strategy implements aspects of the ACT Government's Living Infrastructure Plan, which sits alongside the Climate Change Strategy 2020-2025 and establishes a tree canopy for the city of 30% by 2045, and a 30% permeable surface target.

Canberra's urban forest is a vital asset and resource with regards to managing urban heat, protecting biodiversity, and ensuring the health and wellbeing of the community. Currently composed of roughly 767,636 trees<sup>1</sup>, the urban forest provides tree canopy cover to approximately 21% of our urban footprint.

Canberra's urban forest will help build resilience against the impacts of climate change, enhance nature connectivity across the urban landscape, and deliver quality-of-life benefits to the community. Trees and shrubs provide vital refuge for wildlife and pollinators across the urban landscape and cool the urban environment.

### **The Conservation Council supports the implementation of a comprehensive strategy for Canberra's urban forest that:**

1. Meets the 30% tree canopy target equitably across suburbs
2. Integrates the tree canopy objectives and the tree protection regime.
3. Includes planting a diverse mix of native and non-native trees and shrubs in urban parks to support connectivity and habitat for wildlife and pollinators, optimise solar access in winter and shade in summer, and reduce the need for mowing;
4. Ensures suitable species selection for the ACT environment, accounting for future climate projections;
5. Focusses planting efforts in the next decade to ensure 2045 targets are met.

### **What constitutes our urban forest?**

The ACT's urban forest has traditionally been identified by "street trees". This strategy widens the definition of the urban forest to include all of the trees and other vegetation in the urban landscape, including on unleased lands. Pockets parks, urban open space between suburbs, and road verges all have potential for planting. However, there are also opportunities to conceptually change what we understand by "forest" to include the understory. Mid and large sized shrubs can play a valuable role creating positive environments for larger trees as well additional habitats for wildlife and pollinators. This

---

<sup>1</sup> Tapsuwan, S., Marcos-Martinez, R., & Schandl, H. (2019) '*An environmental-economic accounting of services provided by the living infrastructure in the ACT: public urban forests and irrigated open spaces*', CSIRO, Canberra.

strategy explicitly focuses on just the trees in the urban forest. It is suggested that this focus should widen and there should be more integration of under-story throughout the strategy.

### **An urban forest for a changing climate**

Urban trees will become increasingly important as we seek to build resilience in the face of climate impacts, such as longer, hotter summers and extreme storm events. They will improve the liveability of the city, something which will become crucial as we experience hotter and drier conditions, and will facilitate people making choices that will improve their health and wellbeing, such as walking or cycling for short journeys and being outdoors more often. Cities that are hot and dry with limited shade will drive people indoors, and into their cars, as they seek to escape the heat.

### **Biodiversity**

A diverse urban forest that connects habitat is crucial to support biodiversity across the city. Canberra's urban footprint is interwoven with Nature Reserves through old and new suburbs. Improving the biodiversity opportunities through expansion of the urban forest across our urban open space is a wonderful opportunity to improve connectivity for birds and small mammals, and pollinators, again improving resilience in the face of a changing climate. Consideration must be given to the appropriate siting of native and non-native trees and shrubs, and the impacts of a changing climate on plant suitability.

### **Recommendation:**

- Articulate the biodiversity objectives more clearly in the vision of the Urban Forest Strategy, which currently only focuses on the benefits to the community.

### **Early Investment**

Given our urban forest is ageing, there are significant challenges maintaining urban tree canopy, let alone increasing city-wide tree canopy cover to 30%. To meet the ACT's tree canopy targets, significant investment will be required to boost overall tree numbers, including compensating for tree losses expected to occur as a result of old age, storms, and drought. Recurrent funding will be required to support the planting and maintenance of trees and shrubs to ensure full replacement of ageing trees and expansion of the urban forest to achieve the 30% canopy target by 2045. In order to meet the target's timeframe, planting will need to occur within the first decade of the strategy.

### **Integration with planning law**

The urban tree strategy should be supported by changes to precinct planning that maximise shared greenspace in new developments to facilitate space for urban tree plantings in streets, urban open space and on residential blocks.

The Strategy acknowledges that an ideal outcome would be to achieve the canopy targets in an equitable manner across the suburbs. However, previous planning decisions will make that challenge very difficult in some newer suburbs where urban open space and verges has been reduced. Changes to planning requirements for new suburbs should be made to ensure that there is room for planting and maintaining shade trees on all streets, to reduce urban heat and support livability. Urgency is required due to the time it takes to plan new

developments and the delayed implementation of planning requirements. Otherwise, new suburbs will continue to be disadvantaged for decades into the future.

### **Community engagement**

The ongoing and expanded support of community groups, such as Adopt-A-Park, will be crucial to facilitate the community undertaking planning, maintenance and citizen-science initiatives in urban greenspace. In addition, broader community awareness campaigns should be rolled out across our suburbs as there is an extraordinary lack of awareness of the benefits provided by street trees, and the behaviours that can harm them, such as compacted soils through parking cars on nature strips. While the issue of urban trees was rated by the Better Suburbs consultation as the second most important urban services issue in the city, the community needs a deeper understanding of how to support our urban forest to ensure their full support of the Strategy.

## **Feedback on the key objectives within the draft Strategy:**

### **1. Protect the Urban Forest**

The Council welcomes the Strategy's recognition that current legislative frameworks are failing to adequately protect our urban forest. The Conservation Council made a [submission](#) to the Tree Protection Act review in December 2019. Many of the issues raised in that submission remain pertinent to this section, and we would refer you to that submission. We look forward to further work to streamline the legislative frameworks to ensure strong measures to protect trees and incentives to ensure adequate tree replacements where trees are required to be removed.

We would highlight that we support **strengthening** the criteria for protection under the Tree Protection Act to protect smaller trees that may have ecological and canopy value. The removal of smaller trees on unleased land that either already provide value, or are able to provide value in a shorter time frame, is unacceptable purely because they do not meet the criteria in the Tree Protection Act. In addition, removal of smaller trees in development zones should be undertaken as a last resort, with tree protection incentivised and tree removal adequately compensated for.

In 2018, 'the loss of mature native trees (including hollow-bearing trees) and a lack of recruitment' was listed as a key threatening process in the ACT<sup>2</sup>, with an action plan due for release. However, mature trees are still being felled for greenfield urban developments and within established suburbs of the ACT.<sup>3</sup> We support mandating the use of quantitative tree risk assessment for mature trees in the ACT, which only permits tree removal where risk is above internationally accepted levels and where this risk cannot be mitigated by actions such as landscaping and tree management.

---

<sup>2</sup> Environment, Planning and Sustainable Development Directorate (2019), *Key Threatening Processes*, ACT Government, Canberra.

<sup>3</sup> Commissioner for Sustainability and the Environment, (2019). *ACT State of the Environment - 2019 Report*, (p.85. 200).

Recommendations:

- Strengthen the threshold for protecting trees under the Tree Protection Act (1.2.1).
- Bring forward the time frame for Action 1.2.3 to “immediate”.
- Bring forward the time frame for Action 1.3.2 to “immediate”.

## 2. Grow a resilient forest

Urban forest coverage, or tree canopy, across Canberra’s suburbs varies from 5 - 40%, which results in some areas experiencing significantly more urban heating than others. A 2017 CSIRO report<sup>4</sup> identified that new suburbs such as Bonner had low canopy coverage and were noticeably hotter than other suburbs such as Reid, which has significantly larger tree cover, shady parks and irrigated gardens.

The strategy supports the 30% canopy coverage target committed to in the Living Infrastructure Plan 2019, with data indicating that over 450,000 trees will need to be planted over the next 25 years. To date, the Government has committed to plant a total of 25,000 trees by 2023, with over 4,000 planted in the Autumn program this year. The strategy is unclear about when the focus of planting will occur, and the expected canopy cover benefits achieved.

In general terms, as an acknowledgement that trees don't deliver canopy target benefits until they reach a certain size, the implementation of the strategy will require a large amount of front end investment, albeit at a scale that is manageable and not counter-productive. Many of the trees that are planted will need to be well maintained over the first five years to ensure their survival, and our changing climate change is likely to make it harder to support new plantings. It would be helpful to acknowledge this in the strategy and outline when the bulk of new planting will need to take place.

Much of our urban forest is currently situated in urban open space, which occupies approximately one-fifth of the urban area. There are opportunities to expand our urban forest within urban open space, which has been identified by some as an under-utilised resource in terms of climate regulation, health and wellbeing and biodiversity enhancement.<sup>5</sup> Conceptually shifting our thinking about the urban forest just being composed of street trees, but rather all tree planting on unleased lands, provides additional opportunities for diversifying tree species and creating additional habitats for wildlife. Pockets parks, urban open space between suburbs, and road verges all have potential for planting. It is welcome that the draft Strategy recognises the need for species diversity to ensure the urban forest is resilient, composed of more natives and supports biodiversity through improved connectivity.

Objective 2 of the Strategy acknowledges that in order for planting programs to be successful, they must be flexible and responsive to changing conditions. This is especially

---

<sup>4</sup> Meyers, J., Devereux, D., Van Niel, T., & Barnett, G. (2017) *'Mapping surface urban heat in Canberra'*, CSIRO, (p.28).

<sup>5</sup> Fenner School of Environment and Society (2018), *Submission to Nature in our City Inquiry*, Australian National University, Canberra.

important in the context of a changing climate, which will drive an imperative for longer post-planting care requirements, including pruning, watering and other maintenance (p. 36). The Government doesn't have the capacity to undertake routine maintenance of the current urban forest, so maintenance regimes for new plantings across the city will require additional resources. Action 2.1.2 details a sustainable program of end-of-life tree removals, replacements for removed trees and existing planting gaps to maintain the urban forest, including best practice after-care for new plantings. Extending this provision to Action 2.1.3 is also recommended given most new plantings will require maintenance (water, pruned etc.) for at least five years in a manner that is consistent with best practice and that promotes their ongoing survival and longevity. In addition, as the forest increases in size, more resources will be required to undertake whole-of-life protection.

### Recommendations

- Include an indication of the planting schedule that is required to ensure that canopy targets are met by 2045.
- Amend Action 2.1.3 to include suitable maintenance for all new plantings to ensure maintenance meets best practice (ie. at least 5 years of maintenance, ongoing watering regimes and regular pruning).

## 3. Balance and diversify the urban forest

We support the need for species and age diversity across the urban forest to build resilience. Uniformity of planting, and a limited number of species leave the urban forest vulnerable to threats such as extreme climates and or disease that may impact badly on particular species. Additionally, the urban forest in its current state lacks diversity, with a recent CSIRO report finding that only 42 percent of the urban forest was composed of native species.<sup>6</sup>

The definition of an "urban forest" has previously been somewhat limited to street trees, and certainly this has been the scope of the program within the ACT Government until recently. The draft Strategy recognises the components that make up the urban forest as a whole, including other vegetation, waterways and nature corridors (p.9). The Conservation Council suggests that this definition should widen, not just to include forest on other areas of unleased land, as suggested in the draft Strategy, but also to encompass other types of plantings that might not be considered "trees", eg mid-large sized shrubs. While they may not directly contribute to tree canopy, they will add additional value to improving habitat for wildlife and pollinators, which in turn supports a more robust forest. Understorey plantings should be explicitly articulated in the action plan of the strategy.

Utilising understory plants such as shrubs and groundcover can also reduce the need for maintenance activities such as mowing, something that results in the further spreading of invasive weeds and is an expense for the Government. Understorey planting can also play a role in protecting mature trees, as understory plants and other resources like rocks can be

---

<sup>6</sup> Tapsuwan, S., Marcos-Martinez, R., & Schandl, H. (2019) '*An environmental-economic accounting of services provided by the living infrastructure in the ACT: public urban forests and irrigated open spaces*', CSIRO, Canberra.

strategically placed around the base of these trees to divert commuting traffic away from these areas, both ensuring the safety of residents and protecting the tree.

We support the appropriate placement of urban trees, and note that proper consideration must be given to the use of the areas (walking, cycling, transport corridors), the biodiversity values of an area (grasslands are not suitable locations for urban trees), and the size and nature of the tree (some large eucalypts may not be suitable to be planted near houses or public infrastructure). Co-location of trees can also help support their own survival.

#### **Recommendations:**

- Ensure that the strategy specifically addresses understory planting of mid-large scale shrubs.
- Investigate areas that can become low/no mow zones across the city.
- Amend Paragraph 3 on Page 21 to state that the audit showed a heavy reliance on eucalyptus, with little diversity in the use of native trees. This will remove any ambiguity around the use of and need for native plantings.
- Articulate how the location of tree planting is taken into consideration with regards to size, function, biodiversity values and co-location.

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

A recent CSIRO study commissioned by the ACT Government valued the ecological benefits of the urban forest at \$27.12 million.<sup>1</sup> Some of services and benefits provided by our urban trees include, but are not limited to, carbon sequestration, pollution removal, mitigating stormwater runoff and reducing the urban heat-island effect.<sup>1</sup>

Page 21 outlines the importance of species diversity. The third paragraph details that a “2010 audit showed a heavy reliance on native species, with eucalyptus accounting for approximately 40% of all trees”. The wording of this section makes it sound like natives are over-relied upon as a planting option, when the 2018 CSIRO report<sup>7</sup> demonstrated that less than half (42%) of the urban forest was native. We would argue that this is not an overly heavy reliance, and that native plantings should continue to be enhanced across the city.

Both native and non-native species have a role in the urban forest, and both should be utilised effectively in appropriate locations to enhance canopy coverage. While deciduous non-native trees may be better utilised as streets trees in many suburbs, native trees and shrubs in urban parks and nature corridors will help to provide habitat and food for wildlife.

The strategy details the importance of pollinators under Objective 4, but fails to recognise pollinators in the actions. Pollinators are vital in the city as they maintain the natural pollination process for seed production and play a large role in the renewal of our landscape.

---

<sup>7</sup> Tapsuwan, S., Marcos-Martinez, R., & Schandl, H. (2019) *'An environmental-economic accounting of services provided by the living infrastructure in the ACT: public urban forests and irrigated open spaces'*, CSIRO, Canberra.

<sup>8</sup> An effort to reduce pesticide use for maintenance of the urban forest (especially neonicotinoids), would ensure pollinators are attracted to, not deterred from, the urban forest.

### Recommendations

- Amend Objective 4.2 to read “urban forest renewal provides habitat and resources for wildlife *and pollinators*”.
- Incorporate pollinators into Actions including 4.2.1 to recognise the need for plantings to support pollinators as well as wildlife.
- As much as possible, reduce use of pesticides for urban forest management.
- Mandate that at least 50% of the living infrastructure in the urban open space of new suburbs are pollinator-friendly trees, shrubs and groundcover plants for year round flowering.
- Consider expediting actions 4.2.1 and 4.2.2.

## 5. Develop infrastructure to support the urban forest

The Conservation Council recently provided a [submission](#) on DV369 which explored living infrastructure in residential zones. A key recommendation in our submission included greater streamlining between planning laws like the Estate Development Code and the Living Infrastructure Plan to ensure residential blocks are well planned and support high quality greenspace that can be shared by residents. With careful planning, space can be left for tree planting in medium density housing areas, and the benefits of the urban forest can be integrated into new developments.

The Conservation Council supports re-using trees/materials that need to be removed to support biodiversity outcomes elsewhere (ie. trees that are felled placed in other areas to create habitat for reptiles and other ground-dwelling species).

### Recommendations

- Expedite action 5.2.1 (p.45) to occur within the next 5 years.
- Expedite action 5.2.3 (p.45) so that plantings can occur within the next 10-15 years.

## 6. Partner with the community

Community members and groups play an integral role in maintaining and growing the urban forest. Groups such as Parkcare and programs like Adopt-a-Park significantly contribute to enhancing community involvement in caring for their local forest ecosystems, yet sustained funding is required in order to resource this work. As such, an action should be developed that delivers secure funding for these groups and activities.

---

<sup>8</sup> ACT for Bees (2020). ‘*Bees, Butterflies, Birds. Maximising Biodiversity by supporting pollinators.*’.



While community input can add additional value to the urban forest and reduce costs for the Government, it should not negate the responsibility of the government to manage the urban forest asset appropriately.

Consideration could also be given to ways to encourage maintenance of plants on leased blocks, perhaps through incentivisation or the community education materials detailed in Actions 6.3.1 and 6.3.3. This could be coupled with incentives to increase permeable surfaces on leased land.

### **Recommendations**

- Continue and expand the Adopt-A-Park community grant program to facilitate the community undertaking planning, maintenance and citizen-science initiatives in urban greenspace.
- Consider providing incentives under Action 6.2.1 for maintenance of trees and shrubs on private land, and subsequently amend this action to read “investigate incentives for retention *and maintenance* of trees on private land....”.
- Include tips for maintaining aspects of the urban forest (ie. trees, rocks, understory plants and urban sensitive water design) on leased land in Actions 6.3.1 and 6.3.3.

### **Minor amendments**

- The title page of the Strategy doesn't state its longevity, which is only clarified later in the document (p.5). This needs to be stated on the title page to read “Urban Forest Strategy 2020-45”.
- The Strategy also makes reference to reports that have been previously written about the urban forest, including the Urban Forest Tree Research that was conducted by the ANU (reference on page 21 stating “the resulting report”). It would be useful to include links to the referenced reports at the end of the Strategy.