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cc Bass Coast Shire Councillors

Re: Urban Forest Strategy feedback

Thank you for the opportunity to provide Phillip Island Conservation Society (PICS) comments on the draft Bass Coast Shire Council Urban Forest Strategy (UFS). We are excited to see the UFS come to fruition and, overall, very supportive of its approach.

Key objectives, outcomes, and targets

We are pleased to see ambitious, measurable targets within the UFS. However, we seek clarification that the urban forest (tree canopy and shrub cover) percentage targets apply to all land tenures within townships, not simply public land.

The Engage Bass Coast UFS web page states that there are two key targets:

- No net loss of vegetation on private residential land.
- Urban forest cover will increase to an average of 40% *across public land* in townships by 2040.

The UFS document expresses the targets differently:

- No net loss of vegetation on private residential land and a minimum of 25% canopy coverage across all townships by 2040.
- Urban forest cover will be increased in townships to reach an average of 40% by 2040.

We support the UFS objectives and outcomes and agree that it is best to first protect the urban forest assets that we have, particularly remnant trees with hollows and high habitat value. We cannot emphasise enough the importance of considering impacts on trees at the earliest stages of public infrastructure planning, site selection, and design.

Prior to selection of each public infrastructure site, trees that are likely to conflict with the proposed infrastructure should be valued using council's adopted tree valuation methodology and included as a budgeted cost of construction in the business case (see recommendations 11 and 12 below). Where tree retention is unlikely to be possible, other potential sites should be considered.

Public infrastructure design should prioritise tree retention. Some regrettable losses of remnant, hollow-bearing trees have occurred due to conflicts with the Cowes Transit Centre and Community Hospital. We are grateful that the Cowes Cultural Centre was redesigned with the intention of retaining some of the last native trees remaining in the precinct, which had been marked for removal under an earlier design proposal.

Recommendations:

1. Clarify that the UFS urban forest cover percentage targets apply to all land tenures (not simply public land) across townships.
2. Add an outcome under the "embed" objective: "Impacts on trees are minimised from the earliest stages of public infrastructure planning, site selection, and design."

Who is responsible for the urban forest?

The UFS underscores the complexity of managing the urban forest and sets out the roles of the many land managers that operate alongside council. PICS considers that one of council's

roles is to act as an overarching advocate for the Bass Coast urban forest, providing leadership and promoting transparency and collaborative management among the many land managers to meet UFS goals.

For example, the Victorian Department of Education is responsible for the Cowes Primary School sanctuary, which PICS and a range of community stakeholders regard as an important urban forest asset. The sanctuary recently lost area for the creation of school gym facilities, and it is possible that future school expansion will place pressure on the remainder. PICS heard concerns at its AGM in January that there had been recent and substantial clearing of understorey within the sanctuary. While we recognise that this will have been for safety purposes, we also consider that community consultation and transparency around the management and future of the sanctuary needs to improve. We hope that council can advocate to Cowes Primary School and the Department of Education regarding the importance of this vegetation and the need for consultation and transparency around its management.

Recommendations:

3. Work with Cowes Primary School and the Department of Education to understand management plans for the school sanctuary and factor them into UFS planning.
4. Investigate the potential for the Cowes Primary School sanctuary to be included on the proposed municipal register of significant vegetation.

Trees on private land

PICS is pleased that the UFS recognises that since private land makes up 76 percent of the shire area, it is critical to growing and connecting urban forest assets. For this reason, we are delighted to see the introduction of Local Law No. 1 section 30 regarding significant and protected trees. Confusingly, the UFS refers to “Local Law 30 – Significant and Protected Trees”. We suggest that the UFS refer instead to Local Law No. 1 section 30 to ensure that community members can find the relevant information. The UFS also states that guidelines have been prepared regarding assessment of permit applications for trees listed as significant or protected. We have been unable to find these guidelines on the council website or via a link in Local Law No. 1.

We are extremely concerned at the pace of tree removal on private land on Phillip Island. At our AGM in January, members reported that substantial tree removal is occurring in their neighbourhoods without permits or enforcement, despite the members alerting council at the time of tree removals. We have since read council advice to the Phillip Island and San Remo Advertiser (7 February 2023) that “the shire would not immediately enforce the [significant and protected tree] permit requirements, with the focus on education in the first half of 2023”. While we agree that there is a strong need for education, we are concerned that this statement will encourage private landowners to remove trees with impunity during this period of non-enforcement. The local law has been in place since July 2022, with publicity having already occurred regarding the changes, so we cannot see a reason to delay enforcement and risk accelerating tree losses on private land.

On a positive note, PICS is pleased to see UFS action 1.8 (advocacy for increased penalties for damage or removal of vegetation without required approvals), action 3.5 (investigating potential incentives and support for retaining vegetation on private land), and other actions to educate and engage the community.

Recommendations:

5. Clarify the UFS language referring to local law provisions for significant and protected trees, and ensure that the local law provisions and permit assessment guidelines are prominent and easily accessible on the council website.
6. Begin immediate enforcement of Local Law No. 1, section 30 regarding permit requirements for significant and protected trees.
7. Allocate a short-term (currently medium-term) timeframe to action 1.8 re advocacy for increased penalties for unauthorised damage or removal of vegetation.

Development

Council has issued planning permits for a variety of developments over the years, many with conditions requiring plantings. We have heard concerns from members regarding a lack of compliance with planting conditions for some developments.

Recommendation:

8. Audit the effectiveness of processes to ensure compliance with planning permit planting conditions for developments.

Foreshore vegetation

PICS is pleased to see that the UFS recognises that foreshore reserves are a key part of our urban forest. PICS puts many hours into maintaining these areas through Friends of Scenic Estate Reserve (FOSER) and Red Rocks Saltwater Creek Coastcare, and many of our members also volunteer in other Coastcare groups across the shire. While we are grateful for council's support for FOSE and Coastcare groups, there is a need for more strategic, coordinated, and better resourced foreshore weed control, which is not fully articulated within the actions of the UFS.

Foreshore vegetation is often damaged through the unauthorised creation of tracks for beach access or BMX use. As we have reported to council, vegetation is also damaged by the unregulated storage of watercraft, including damaged and abandoned craft, in dunes or tied to foreshore vegetation. In 2021, we recommended that council improve its capacity to manage this by introducing a simple system of annual registration of watercraft and payment of permit fees, as other local governments do around Australia, e.g. www.portstephens.nsw.gov.au/services/dinghy,-kayak-and-canoe-storage. Such a system would enable council to control the type and cap the number of watercraft stored in a given area to reduce vegetation damage, contact owners if craft caused damage or danger, and quickly identify abandoned craft.

Recommendations:

9. Add the following actions to complement action 1.9 (continue to respond to damage of public or foreshore vegetation on site as per Foreshore and Bushland Reserves Vegetation Protection Policy):
 - a. Audit foreshore tracks and close informal tracks in sensitive areas for revegetation.

- b. Identify gaps in recreational facilities, such as BMX tracks, that encourage damage to vegetated reserves.
 - c. Regulate the storage of watercraft by requiring annual registration and payment of a permit fee for all craft stored in the foreshore reserve, and remove unregistered, unauthorised, and abandoned craft.
10. Expand action 1.10 (develop a policy to guide the removal of weedy species in our urban forest) in scope and budget to include weed mapping within foreshore reserves and development of a plan for strategic, coordinated control.

Tree valuation method and registers of significant trees and vegetation

PICS supports action 1.2 regarding development of a tree valuation methodology for use in tree asset protection bonds. The City of Melbourne tree valuation method was recommended to PICS by arborists during our pilot efforts towards a Phillip Island significant tree and vegetation register. Pandemic restrictions and other demands on our volunteer panel prevented us from completing this project. However, we are excited to see significant tree and vegetation registers as UFS actions 1.3 and 1.12. We will endeavour to collate our learnings and tree nominations and pass this information on to council as soon as possible.

Recommendations:

11. Consider using the City of Melbourne tree valuation method outlined here: www.melbourne.vic.gov.au/community/greening-the-city/tree-protection-management/Pages/tree-protection-policy.aspx
12. When trees are removed for public infrastructure, they should be valued, and equivalent funds should be allocated to the UFS budget to ensure replacements in the local area.

Monitoring and evaluation

PICS recognises that because this is a new strategy, many actions are not yet budgeted, and priority is indicated simply by allocating “ongoing” or “short-term” timelines to work that has already begun or is foundational. To ensure momentum, we recommend an annual evaluation of progress.

Recommendation:

13. In addition to measuring canopy cover change every five years, publish an annual evaluation of progress against each UFS objective, outcome, target, and action.

Conclusion

Thank you again for the opportunity to comment on the UFS. We look forward to its implementation and collaborating with council on UFS projects in future.