

Draft Urban Forest Strategy – Schedule of Submissions

Submitter No.	Submission	City Response
1.	<p>We regard it as essential for the City of Kalamunda to protect the remaining urban forest in the City by retaining the rural and semi-rural land use zonings of land within our City boundary and, in particular, the rural zoning of Wattle Grove South, a known unique and environmentally sensitive area.</p>	<p>Noted.</p> <p>The Urban Forest Strategy (UFS) applies to all land uses, including both rural and urban and includes actions relating to the protection and enhancement of tree canopy. Of particular note is the action to implement the City's Local Planning Policy 33- Tree Retention (currently in draft) which sets minimum tree planting and canopy targets as well as tree replacement planting.</p>
	<p>As you know, the Environmental Protection Act specifically regulates the clearing of native vegetation and tree canopy in areas where land is zoned rural/special rural/rural residential. These protections do not exist in areas zoned for residential sub-division.</p>	<p>No specific comment relating to the UFS. It is noted that this statement is not factually correct.</p>
2.	<p>Being a resident in Wattle Grove South and having endured the relentless push from the City of Kalamunda Council for the last 2 ½ years to urbanise our beautiful eco sensitive semi-rural area, I know only too well the importance of protecting the 'urban forest'. While this draft strategy on the surface seems that you are now acknowledging the importance of this fact, it appears to be in complete contrast with your actions.</p>	<p>Noted.</p>

	<p>I would like to make comment on your draft strategy, as I believe you need to prevent this loss of forest rather than trying to fix the problem after you have created it. For this reason, it is crucial for the City of Kalamunda to protect the remaining urban forest in the City by retaining the rural and semi- rural land use zonings of land within our City boundary and, in particular, the rural zoning of Wattle Grove South, now documented as a known unique and environmentally sensitive area.</p> <p>Your opening 'Vision' statement says "City of Kalamunda seeks to conserve and grow its urban forest" which means that you should not be allowing the disastrous clearing of land by developers and to some extent landowners.</p>	<p>The Urban Forest Strategy (UFS) applies to all land uses, including both rural and urban and includes actions relating to the protection and enhancement of tree canopy. Of particular note is the action to implement the City's Local Planning Policy 33- Tree Retention (LPP 33) which requires applicants to avoid the removal of existing trees where possible and to plant new trees associated with development. The LPP 33 includes policy measures that apply to all land uses.</p>
	<p>The Environmental Protection Act specifically regulates the clearing of native vegetation and tree canopy in areas where land is zoned rural /special rural/rural residential. These protections do not exist in areas zoned for residential sub-division.</p>	<p>No specific comment relating to the UFS. It is noted that this statement is not factually correct.</p>
	<p>Your 'Introduction' statement highlights the destruction of urban infill, in particular along the Swan Coastal Plain. Through the Local Planning Strategy, the City has the ability to influence development, yet the City of Kalamunda through its own omissions has allowed this continual destruction. Once this vegetation is gone it's too late. You can put smoke and mirrors up and suggest replanting new trees etc and make it sound great, but what's done is done, and you have then destroyed an entire ecological system. These areas are the ones you should be focussing on more so and "conserve it where possible, and enhance it into the future" as your draft</p>	<p>UFS acknowledges the various threats to the City's urban forest, one of which is Urban development. The UFS includes actions which aim to protect and enhance the City's urban forest, including planning provisions. Of particular note is the action to implement the City's LPP 33, which outlines the City's expectation for trees to be retained in new development. Where unavoidable tree removal is approved, replacement planting at a higher ratio may be conditioned.</p>

	<p>suggests. What is failed to be mentioned here, yet has been mentioned for the Darling Scarp and Darling Plateau, is that it is the residents that have worked hard in this area to conserve good tree and shrub canopy themselves, so I think this is an inaccurate summary of the area.</p>	<p>It is noted that the UFS purely focusses on tree canopy. Local biodiversity and ecosystems are a consideration of the City's Draft Local Biodiversity Strategy, currently undergoing a peer reviewed.</p> <p>It is noted that the previous version of the UFS acknowledged the efforts of residents and the City in conserving vegetation in the Darling Scarp and Plateau areas but failed to acknowledge these efforts on the Swan Coastal Plain. The UFS introduction has been revised and this detail has been removed. The City acknowledges the important role of the community in protecting and enhancing the urban forest and has included a core goal in the UFS to engage and actively involve the community in implementation of the UFS.</p>
	<p>You ask for community engagement, and 75% of residents in Wattle Grove responded that this area should retain its rural land zoning, which as stated above allows for development that will protect the environment within this area. Yet this appeared to have fallen on deaf ears, with 7 councillors voting in favour of changing the future land use to urban, acting on the recommendation of the City administration, rather than the majority of residents, whom they are meant to represent.</p>	<p>Noted. No specific comment relating to the UFS.</p>
	<p>I would like to comment on Figure 5 Urban Heat Island Effect. My block and my neighbouring blocks have quite a high density of trees and shrubs as does a lot of this area, so I would like to know where the data was taken for the temperature records? The map indicates</p>	<p>The land surface temperature was estimated by CSIRO using the following methodology: Land surface temperatures were calculated using data from the Landsat 8 thermal infrared sensor (TIRS) band</p>

	<p>the entire area as high average temperatures, whilst I would think this would only appear closer to the Tonkin Highway end where these blocks have less tree density, so I question this. This new term 'Heat Island' is something we should all be very concerned about. This is a result of urbanisation at its best, or should I say worst!</p>	<p>10. Each image was processed using the generalised single channel method of Jiménez-Muñoz et al. (2003, 2009). The required atmospheric parameters were obtained from publicly available observations by the Australian Government Bureau of Meteorology (BOM). The required land surface emissivity (LSE) values were estimated using the NDVI approach (Sobrino & Raissouni 2000). Urban Heat Island (UHI) was estimated by subtracting from the LST images an estimate of non-urban baseline temperature. This baseline was estimated by a first-order fit to the temperature of native vegetation within and around each urban centre.</p> <p>The source of the land surface temperature is cited; Devereux, Drew; Caccetta, Peter (2019): Land surface temperature and urban heat island estimates for Australian capital cities, summer 2018-19. V1. CSIRO. Data Collection. https://doi.org/10.25919/5d8adf30f001e</p>
	<p>Overview 1.5 again sums up the significance of the 'already existing tall tree canopy and flora and fauna associated in areas which have already been identified and the need to retain these areas.' It also states 'the loss of approximately 630 hectares of native vegetation from the City in the period from 2008-2020.' YOU NEED TO STOP THIS NOW!! We must retain these precious areas. Talk the talk, walk the walk!</p>	<p>The quoted vegetation loss of 630 ha is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. The datasets used to determine this figure were DPIRD "native vegetation extent" data from 2005 and 2020. The methodology for mapping native vegetation extent was modified between these two datasets and resulted in a significant change to the mapped area of native vegetation, where there was no physical vegetation</p>

		<p>loss. The quoted vegetation loss was a result of the two datasets being erroneously used for comparative purposes and not adequately interrogated. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p>
	<p>Point 1.7 Swan Coastal Plain – ‘Urban development has often failed to retain urban forest or even retain a single tree.’ As stated in your draft, ‘Wattle Grove still has a significant area of rural owned land which allows for the retention of trees and increases the average canopy across the suburb.’ Yet you are willing for one of the largest urban forest areas remaining in the foothills, 340 hectares of Eco-sensitive land to be rezoned to urban, which will then no longer protect this land. So you are acknowledging in your own document the destruction of the urban forest by urban development, and this cannot continue. Again you NEED TO PROTECT THESE AREAS.</p>	<p>The Urban Forest Strategy (UFS) applies to all land uses, including both rural and urban and includes actions relating to the protection and enhancement of tree canopy. Of particular note is the action to implement LPP 33 which requires applicants to avoid the removal of existing trees where possible and to plant new trees associated with development. LPP 33 includes policy measures that apply to all land uses.</p>
	<p>I would like clarification on ‘Canopy cover across the Swan Coastal Plain is summarized in Error! References not found.’ I would like clarification on ‘A major reason for large areas of low canopy cover indicated by the red area in Error! References not found.’</p>	<p>Although no longer relevant to the current Draft UFS, the two error messages referenced by the submitter should have read:</p> <ol style="list-style-type: none"> 1. ‘Canopy cover across the Swan Coastal Plain is summarised in Figure 7. 2. ‘A major reason for large areas of low canopy cover indicated by the red area in Figure 7.’

		<p>It is noted that the text, charts and figures have been amended in the revised draft UFS and these issues resolved.</p>
	<p>'Opportunities' – In this section I will agree with your 3 points of opportunities in the need to work with the community at large and revegetate where needed, I have absolutely no objection to this. However, this does not address the issue of urban development and its resultant removal of trees and vegetation which is vastly detrimental. This has been brought to the attention of Council on numerous occasions and yet it has appeared to have fallen on deaf ears. One example is the cleared private property on the corner of Brentwood Road and Welshpool Road, where the entire block was cleared. Another example is along Welshpool Rd near the Swan Animal Haven. How on earth did these get approval? I would like to know? The MKSEA is another area of terrible tree loss. Cell 9 – Wattle Grove is another where lovely homes have been built, yet there are no trees there. Where is the accountability? City of Kalamunda, you have allowed this to happen in your own backyard in what often appears to be developer driven.</p>	<p>LPP 33 was adopted by Council in December 2022. The purpose of LPP33 is to carefully consider the need for the removal of trees of a particular size and maturity and to minimise the removal and impacts to these trees through the planning and development process. LPP33 also seeks to increase canopy cover with planting provisions for new developments which vary the State R-Code requirements for lots coded R25 or lower. LPP 33 also includes provisions for replacement tree planting for unavoidable tree removal. The implementation of LPP 33 is a key action which will assist with achieving the aspirational target and goals of the UFS.</p> <p>Additionally, the City have appointed a full-time Senior Compliance Officer and have recently, successfully prosecuted for unlawful tree removal.</p> <p>The UFS includes core goals to protect and enhance the City's urban forest and associated actions to achieve these goals.</p> <p>Queries regarding individual instances of vegetation clearing should be submitted to the City via email to enquiries@kalamunda.wa.gov.au. The City's Planning</p>

		<p>Department can investigate and respond to these individual queries.</p>
	<p>So this brings me to my own view that your Draft Urban Forest Strategy appears to be quite hypocritical. I personally have stood up in Council on many occasions and told you like many others of the importance of protecting our tree canopy, the flora and fauna, and yet history has shown repeatedly, including at the Council meeting on the 24th November 2020, the City of Kalamunda blatantly ignored the pleas of the majority (75%) of residents to retain this area due to its environmental significance, and instead steamrolled ahead for urban zoning. The data is all there.</p> <p>If you want the support of the community behind the 'Draft Urban Forest Strategy' then once and for all you need stop this deplorable destruction of our precious land. People today are very well educated on climate change and its causes, so do the right thing by your people. It is appalling that the City of Kalamunda is now on record as having one of the worst tree canopy losses in Australia. You can talk about planting trees everywhere as a solution in this draft, well stop chopping them down in the first place! It's not just the trees, it is the wildlife and vegetation that goes with it that we will lose. You can't put a bandaid on it anymore, or put your head in the sand and think this won't matter, it will.</p> <p>As I stated in my last deputation to you, and I will repeat this again, we have to remove our own selfish interests to make a quick buck now, we have to think about the interests of others, as what we decide now will leave a legacy for our future generations.</p> <p>Thank you for your time and consideration of my views</p>	<p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>

3.	Overall, I think the team has done a good job and produced a good strategy. The following are what I trust are worthwhile additions to or expansion of some aspects.	Noted.
	<p>Pages 7-8 and Figure 3. Vegetation not only takes up CO2 but also, fundamentally releases oxygen to the atmosphere. This is absolutely crucial to all life (one might go so far as to say more important than climate change).</p> <p>p. 8. Plants indeed provide habitat for insects, but importantly the insects provide food for birds as well as ground- and soil-dwelling fauna.</p> <p>Trees and other vegetation are also crucial in returning nutrients to the soil, thereby maintaining and improving soil fertility (especially for native plants, which do not need synthetic fertilisers). Vegetation transpires moisture, increases humidity and, potentially, rainfall.</p>	<p>Noted.</p> <p>Improved air and soil quality are benefits outlined in Section 2 and Appendix 1 of the Draft UFS.</p>
	p. 28. Opportunities: in relation to vegetating road reserves, placing wires underground would be highly beneficial in allowing trees to grow to normal heights and provide more abundant shade than Western Power trimming currently allows.	<p>Noted and acknowledged that the removal of overhead powerlines mitigates issues with tree heights/ species selection.</p> <p>There are however, competing issues with underground servicing and available space for tree retention and planting. Many of the UFS seeks to resolve these issues.</p> <p>Relocating powerlines underground is Western Power's responsibility.</p>

		It is noted that new developments include underground power.
	p. 31, 1.9. Darling Plateau. There is an important distinction between the (remnant) plateau surfaces and the valleys such as Bickley Valley. They have different soils (duricrusted plateau, loamy valleys), different vegetation and different microclimates, including the effects of aspect; and therefore need to be managed differently.	Noted.
	<p>p. 33 Threats:</p> <ul style="list-style-type: none"> • Clearing. Agriculture is not the only cause: also quarrying, roads/tracks/fire breaks, power line routes; • Fire?? Natural, accidental and deliberate causes. Role of prescribed burning? • Spread of weeds, feral animals; • Illegal off-road activity (4WDs, trail and mountain bikes); • Illegal hunting - includes deliberate introduction of pigs for hunting. <p>All the above damage vegetation, introduce pests and diseases, and are dangerous to legitimate forest users, and to wildlife.</p>	<p>Noted.</p> <p>Bushfire has been added as a challenge to the urban forest. Refer Section 5.8 of the Draft UFS 2023-2043.</p> <p>Other threats outlined by the Submitter relate more to understorey vegetation which is outside of the scope of the UFS, however, will be acknowledged in the City's Draft Local Biodiversity Strategy.</p>
4.	<p>Submitter welcomes the opportunity to comment upon the draft Urban Forest Strategy and the need to maintain and enhance what remains of 'urban forest' in the City of Kalamunda.</p> <p>In reviewing the draft, Submitter revisited the City's history of failure in environmental protection and in relation to the draft found:</p> <ul style="list-style-type: none"> • key references omitted or overlooked • failure to engage contradictions between the City's environmental and land- use policies 	Noted. Responses provided to individual comments below.

	<ul style="list-style-type: none"> • failure to highlight persistent misuse of the City's discretionary planning powers • inequitable application of Strategy 6.2 of the draft action plan. 	
	<p>The City has come late to considering environmental values and the serious issue of loss of tree canopy in particular. Unbridled development—with the City's approval— has irretrievably damaged parts of the Hills and foothills of Kalamunda. And despite residents' opposition, the City continues to pursue policies that would further destroy environmental values in identified environmentally sensitive areas.</p> <p>The contradiction between environmental values expressed in the draft and the City's blatant pro-development stance is insupportable.</p> <p>That said, residents aligned with Submitter are prepared to give in principle support to any effort to remediate and prevent further environmental damage in this beautiful area.</p>	<p>No specific development examples provided for the City to make comment against.</p> <p>It is noted that LPP 33 was adopted by Council in December 2022. The purpose of LPP33 is to carefully consider the need for the removal of trees of a particular size and maturity and to minimise the removal and impacts to these trees through the planning and development process. LPP33 also seeks to increase canopy cover with planting provisions for new developments which vary the State R-Code requirements for lots coded R25 or lower. LPP 33 also includes provisions for replacement tree planting for unavoidable tree removal. The implementation of LPP 33 is a key action which will assist with achieving the aspirational target and goals of the UFS.</p>
	<p>The City of Kalamunda recently attained the dubious distinction of having one of the largest reductions in tree canopy cover of all local government authorities in Australia over the past 4 years (Royal Melbourne Institute of Technology, 2020, Where will all the Trees be).</p> <p>This situation developed despite Priority 2 of the City's Strategic Community Plan Kalamunda Advancing 2027, which obliges the City</p>	<p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p>

<p>to ‘deliver environmental sustainability and maintain the integrity of the natural environment’. This commitment has been repeated in various iterations of the plan since 2013—and yet the City still managed to achieve ecological infamy in the 2020 RMIT study. Such a disgraceful outcome does not surprise many residents aligned with Submitter.</p> <p>.... There is little doubt too that the City will leapfrog over all other contenders in the next RMIT study to top of the list of councils with the highest loss of tree canopy in the country, despite some ‘bandaid’ actions proposed by the authors of the draft Strategy.</p>	<p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City’s total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>
<p>At a council meeting held as recently as 24 November 2020, the City expressly ignored all reference to Priority 2 with respect to future land use considerations in environmentally sensitive Wattle Grove South. The resultant majority decision of 7 councillors—acting on the recommendation of the City administration—had the effect of facilitating the removal of all existing environmental protections from this unique area. If progressed (against the express wishes of affected residents), the further destruction of our magnificent tree canopy will be the result.</p> <p>Regrettably, this Council decision was not taken in ignorance of the existence of Priority 2 or in ignorance of the likely environmental devastation that would result in 340ha of Wattle Grove South. It was taken in the full knowledge of the damage that will likely follow.</p>	<p>It is noted that the following statement is not factually correct “....had the effect of facilitating the removal of all existing environmental protections from this unique area.”. It is further noted that the State Environmental Protection Authority are formally assessing the potential environmental impacts of the Scheme amendment (123.5 ha currently initiated) of the Wattle Grove South area under Part IV of the EP Act. If approved, any future development within the Wattle Grove South area will be in accordance with the requirements of the EPA in addition to the City’s Scheme and local planning policies (e.g., LPP 33- Tree Retention).</p>
<p>For many years, the City has failed to demonstrate genuine commitment to upholding Priority 2 in the face of competing</p>	<p>The development and future implementation of the UFS is directly related to <i>Priority 2: Kalamunda Clean</i></p>

	<p>priorities, notably with respect to land development. In almost every instance, the environment and the people have paid the price. This is the case despite a previous Council taking the position that when considering development proposals, it would prioritise environmental sustainability and social benefit over short term economic benefit for a few. (City of Kalamunda submission to the government's Green Paper to reform the WA Planning System, 27 July 2018)</p> <p>It is difficult to believe that the adoption of the Strategy—particularly after the decision on Wattle Grove South—will make any significant impact on the documented downward trend of our City custodians in managing to keep Kalamunda 'Green and Clean'.</p>	<p><i>and Green, Delivering environmental sustainability and maintaining the integrity of the natural environment.</i></p> <p>The UFS includes core goals to protect and enhance the City's urban forest and associated actions to achieve these goals.</p> <p>The UFS also includes provisions for ongoing monitoring of the success of the UFS actions, trends in canopy cover change, as well as review and continual improvement of the UFS over time.</p>
	<p>Key references overlooked</p> <p>The draft Strategy released by the Council for comment appears to be put together by an external group known as GHD. No explanation is provided in the Strategy to explain the expertise and professional qualifications of this group. How can the public form a considered judgement as to whether its views can be relied upon?</p>	<p>It is not standard to include a description of the consultants environmental expertise in the UFS.</p> <p>The qualifications of consultants assisting with the preparation and review of the UFS are suitably qualified.</p>
	<p>Worryingly, the list of attached references to the draft Strategy does not indicate that the authors have considered all relevant information. In particular, a 2020 publication of ecological surveys in Wattle Grove South by AECOM is missing. This comprehensive report applies to one of the largest urban forest areas (340ha) remaining in the foothills, and yet it is missing.</p> <p>Nor does the reference list include the RMIT research studies of tree canopy loss in local government areas since 2013 across Australia. This is a serious omission.</p>	<p>It is not standard to include individual, detailed ecological surveys in a UFS. The UFS focusses on urban forest canopy cover and this data is sourced through the CSIRO Urban Monitor Program. This program provides a consistent, comparable dataset across all urban forest areas of the City.</p> <p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener</p>

	<p>The omission of these two key references calls into question the validity of the draft Strategy.</p>	<p>Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss. It is noted that this loss was largely experienced in areas of State Forest, Regional Parks and National Parks, which have been excluded from the definition of the urban forest.</p> <p>Bushfire has been discussed as a key threat to the City's urban forest in Section 3 of the revised Draft UFS.</p>
	<p>Local Planning Strategy failure</p> <p>The interrelationship between the City's environmental goals and their land-use planning goals is depicted in graphical form in Figure 2 on page 5 of the draft Strategy in a seemingly benign manner. The fact that the components are incompatible and that the system fails to work in the interests of residents is overlooked.</p> <p>The draft correctly observes that development results in significant loss of vegetation and urban forest. On page 2, the authors say '... residential block infill is leading to mature tree loss on an unprecedented scale.' On page 23, they say '... industrial</p>	<p>The City is in the process of preparing a new Local Planning Strategy. The new Local Planning Strategy will be informed by the Urban Forest Strategy.</p>

	<p>development often results in loss of vegetation and urban forest.' In short, the draft acknowledges that danger signs are evident everywhere.</p> <p>But the draft Urban Forest Strategy (and the City) makes no attempt to reconcile the environmental goals of the strategy with the opposing development goals of the council's Local Planning Strategy. They are incompatible.</p>	
	<p>Further, the draft implies that such development (with the exception of public open space and road reserves) is largely beyond the control and direction of the City. This apparent attempt to absolve the City of any blame for the environmental disaster that is unfolding within its boundaries is deplorable.</p>	<p>The revised Draft UFS acknowledges the shared responsibility in protecting and enhancing the City's urban forest. The revised Draft UFS acknowledges the City's sphere of influence with regard to private land including but not limited to;</p> <ol style="list-style-type: none"> 1. Developing and implementing local planning policy (e.g., LPP 33- Tree Retention); 2. Delivering urban greening programs such as Plants for Residents and Annual Commemorative Tree Planting; 3. Urban forest community education/ engagement.
	<p>Under the Local Planning Strategy, the City restricts some residential dwellings to a mere 180 square metres. Such residents have little room to play and yet the draft implies that they are accountable for the destruction of the existing tree canopy on their properties.</p> <p>In neither case can the City duck its responsibility to reconcile both strategies in the interests of the majority of residents and to</p>	<p>The City is in the process of preparing a new Local Planning Strategy. The new Local Planning Strategy will be informed by the Urban Forest Strategy.</p>

	<p>positively influence the retention of trees in the residential environment through its own planning policies.</p> <p>The reality is that the City can legislatively and proactively influence the form of development permitted within its boundaries and alleviate the environmental impact of development. The available mechanism is the Local Planning Strategy. It is the will that is lacking. History reveals minimal will on the part of the City to reduce the impact of development on the environment. On the contrary, councillors prefer to accommodate developer desires for 'constraint free' land use, often against the express wishes of its own ratepayers.</p>	
	<p>The principles of land-use zoning in the state's NE Sub-Regional Framework could be expected to guide the City's Local Planning Strategy. However, the draft makes no attempt to translate the broad land-use zones of the Framework into the local strategy. Because this work of analysis was skipped, an opportunity to prioritise retention of the City's environmental values was lost.</p> <p>Planning regulations reflect the view that higher densities are usually associated with defined townsites or activity centres. This restriction is reinforced by the state government's 'urban infill' policy. Given the current climate change stressors and imperatives facing the Perth and Peel region, there appears to be no logical reason for the City to approve high-density residential codes (and therefore dwellings) in areas outside the 800 metre boundary of an activity centre. Away from designated activity centres, current zonings that protect the environment should be retained.</p> <p>Having said that, the City's Local Planning Strategy is so embarrassingly out of date that it would have been admittedly</p>	<p>The City is in the process of preparing a new Local Planning Strategy. The new Local Planning Strategy will be informed by the Urban Forest Strategy.</p>

	<p>difficult for the authors of the draft Strategy to consider themselves constrained by its evident inadequacies.</p>	
	<p>Misuse of discretionary power Council decisions in relation to future land use in Wattle Grove South serve to illustrate the inherent hypocrisy of the City in promoting an Urban Forest Strategy at this time. At the same time as the City is putting forward this draft environmental strategy, it is actively facilitating the environmental destruction of up to 340ha of existing urban forest in Wattle Grove South by seeking to rezone this rural area as urban. Attempts to rezone the area have been relentless, despite the known wishes of 75% of affected residents and without any legislative imperative. Indeed, the Department of Planning has made it clear that rezoning of Wattle Grove South from rural to urban will only be approved if any identified significant environmental attributes can be protected. Despite the City having confirmed that the area does contain significant environmental values, it has inexplicably decided to increase its efforts to carve up this area into blocks as small as 300 square metres ahead of the Department of Planning's proposed review of the sub-regional framework in 2021.</p>	<p>It is noted that the State Environmental Protection Authority are formally assessing the potential environmental impacts of the Scheme amendment (123.5 ha currently initiated) of the Wattle Grove South area under Part IV of the EP Act. If approved, any future development within the Wattle Grove South area will be in accordance with the requirements of the EPA in addition to the City's Scheme and local planning policies (e.g., LPP 33- Tree Retention).</p>
	<p>In addition, the Department of Planning's publication Urban Monitor 11 indicates that it would take approximately 62 years to consume all of the land already zoned for urban development, provided that Perth meets its infill targets. This land availability means that there is no systemic pressure to destroy an identified environmentally sensitive area for urban development now or indeed well beyond 2050. Why does the City persist?</p>	<p>Noted. No specific comment on the UFS. The City is in the process of preparing a new Local Planning Strategy. The new Local Planning Strategy will consider future population and dwelling targets informed by the City's Local Housing Strategy and the North East Subregional Planning Framework.</p>

<p>Moreover, the effects of COVID-19 are likely to result in a further slowing in the rate of consumption of land identified for urban intensification and/or increase the desire for greater space between dwellings for health reasons.</p>	
<p>The fact that Wattle Grove South area does not have reticulated sewerage suitable for urban development is merely a further reason for saving the surrounding urban forest. Increased use of septic tanks in the area would be detrimental to both the environment and the watertable.</p> <p>All of the characteristics of Wattle Grove South mentioned above reinforce the need for low-density living and retention of the current rural zoning under the Metropolitan Planning Scheme. Retention would permit sustainable population growth through the City's Local Planning Strategy while ensuring that the clearing of native vegetation for development would continue to require a clearing permit under the Environmental Protection Act 1986.</p>	<p>Noted. No specific comment on the UFS.</p> <p>As outlined above, the State Environmental Protection Authority are formally assessing the potential environmental impacts of the Scheme amendment (123.5 ha currently initiated) of the Wattle Grove South area under Part IV of the EP Act. If approved, any future development within the Wattle Grove South area will be in accordance with the requirements of the EPA in addition to the City's Scheme and local planning policies (e.g., LPP 33- Tree Retention).</p>
<p>Action plan inadequate</p> <p>To achieve the stated goals to maintain and increase the City's urban forest canopy, the draft Strategy contains an action plan. The plan (Table 3, page 36) urges that high priority actions be implemented within 2 years, medium priority within 5 years and low priority actions within 10 years.</p> <p>Most of the actions listed in Table 3 are essentially no different than would appear in all local government authorities' urban forest strategy publications.</p> <p>But Strategy 6.2 (land rehabilitation) is of particular interest for what it fails to address. Some of the worst examples of deliberate and</p>	<p>The UFS has been revised and all actions are not specific to particular landform areas of the City.</p> <p>It is noted that there are no UFS actions relating to amendments to the City's LPS, however, Action 8.3.1 of the City's Environmental Land Use Planning Strategy (ELUPS) requires the City to; <i>'Investigate opportunities to use the LPS to require rehabilitation of land adversely impacting neighbouring lands and caused by an act of non-compliance with planning approval'</i>. The City have prepared draft provisions relating to the rehabilitation</p>

	<p>concerted environmental damage have been perpetrated by owners of rural properties on the Swan Coastal Plain. Yet Strategy 6.2 in the draft is directed only to property owners/occupiers in the Darling Scarp and Darling Plateau, with the Swan Coastal Plain exempted. This exemption is inexplicable and inappropriate.</p>	<p>of land in the draft LPS 4 and if adopted, these will apply across all landform areas of the City.</p> <p>Further Draft LPP 33- Tree Retention includes replanting and remediation provisions for tree removal.</p>
	<p>Clause 5.18 of the City's Local Planning Scheme No.3 and Section 51 of the Environmental Protection Act make it an offence to clear native vegetation unless permitted. The City has the power to take compliance action under the EPA Act but has rarely done so. This reluctance to enforce the law has emboldened some landowners to act in ways that have contributed to tree canopy decline in the City.</p>	<p>The EP Act is administered by the Department of Water and Environment Regulation, who regulate the unlawful clearing of native vegetation.</p> <p>The City has the ability to regulate clearing of vegetation under the <i>Planning and Development Act 2005</i> and has recently, successfully prosecuted unlawful clearing.</p>
	<p>It is only fair and reasonable that all residents of the City should accept societal responsibility for protecting the existing tree canopy to the extent that the law provides for each resident—whether they live on the Darling Scarp, the Darling Plateau or the Swan Coastal Plain. Action 6.2 in Table 3 should be amended to reflect this obligation equitably.</p>	<p>The UFS has been revised and all actions are not specific to particular landform areas of the City.</p> <p>It is noted that there are no UFS actions relating to amendments to the City's LPS, however, Action 8.3.1 of the City's Environmental Land Use Planning Strategy (ELUPS) requires the City to; '<i>Investigate opportunities to use the LPS to require rehabilitation of land adversely impacting neighbouring lands and caused by an act of non-compliance with planning approval</i>'. The City have prepared draft provisions relating to the rehabilitation of land in the draft LPS 4 and if adopted, these will apply across all landform areas of the City.</p>

		Further Draft LPP 33- Tree Retention includes replanting and remediation provisions for tree removal.
	Meanwhile, it is obvious that the most significant action that the draft Strategy could adopt to halt the swift decline of tree canopy loss in the City would simply be to prioritise protection of the remaining rural and semi-rural areas of the City from rezoning.	The City is in the process of preparing a new Local Planning Strategy. Existing rural areas identified by the Local Planning Strategy or other sub-strategies and State Framework for urban expansion or urban investigation will have consideration for the outcomes of the Urban Forest Strategy.
	<p>Conclusion</p> <p>The Department of Planning and the CSIRO released the first publicly available urban forest publication in 2009. This publication urged local governments to act in relation to declining urban forest levels in Western Australia. A further iteration appeared around 2018. It has taken the City 12 years to direct its energies to considering this serious environmental issue.</p> <p>It is therefore difficult for many of the environmentally conscious residents aligned with Submitter to reconcile the apparent desire of the City to prevent further tree canopy loss with the City's blatant record of environmental destruction.</p> <p>The historical evidence shows that much of the area's environmental damage came about as a consequence of the City's questionable land-use planning decisions and its consistent failure to afford more than lip service to Priority 2 in the face of competing land-use priorities.</p> <p>Sadly, the above observation is not simply a matter of historical reflection on past City administrations. It applies equally to the current administration as evidenced by the complete failure of 7 councillors at council meeting held on 24 November 2020 to acknowledge the applicability of Priority 2 to their decision to</p>	<p>Noted. The Urban Forest Strategy includes actions to improve the urban forest in areas that have experienced a reduction in urban forest levels as a result of development as well as actions to protect urban forest that may impacted by future development..</p> <p>The following statement is not factually correct; <i>'Urban zoning will result in the loss of all existing legal environmental protections for this environmentally unique area.'</i></p> <p>As outlined above, the State Environmental Protection Authority are formally assessing the potential environmental impacts of the Scheme amendment (123.5 ha currently initiated) of the Wattle Grove South area under Part IV of the EP Act. If approved, any future development within the Wattle Grove South area will be in accordance with the requirements of the EPA in addition to the City's Scheme and local planning policies (e.g., LPP 33- Tree Retention).</p>

	<p>change land zoning in Wattle Grove South from rural to urban. Urban zoning will result in the loss of all existing legal environmental protections for this environmentally unique area.</p> <p>Many people cynically believe that the City's belated interest in our declining tree canopy has come about as a direct result of increased public scrutiny of the City in the RMIT survey and its naming and shaming as one of the worst local government authorities in Australia in terms of its responsible custodianship of environmental values.</p> <p>Whatever the reason, residents aligned with Submitter support all initiatives designed to protect and enhance the natural environment and to minimise the adverse impacts of human activity to the extent possible.</p> <p>We ask that you give due regard to this submission and any suggested enhancements.</p>	<p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>
5.	<p>Overall the Draft Strategy is good, I sincerely hope it is not just words as sadly although the words and thoughts expressed about protecting the natural environment are comforting to read when it comes to Wattle Grove South / Crystal Brook the reality is very different and the City vision for protecting the natural environment is ignored.</p> <p>The strategy opens with the following vision:</p> <p>1. Vision The City of Kalamunda is committed to an environmentally sustainable future. At a time when climate change and urban growth pose challenges to Kalamunda's 'Clean and Green' environment, the City seeks to conserve and grow its urban forest</p>	<p>As outlined above, the State Environmental Protection Authority are formally assessing the potential environmental impacts of the Scheme amendment (123.5 ha currently initiated) of the Wattle Grove South area under Part IV of the EP Act. If approved, any future development within the Wattle Grove South area will be in accordance with the requirements of the EPA in addition to the City's Scheme and local planning policies (e.g., LPP 33- Tree Retention).</p>

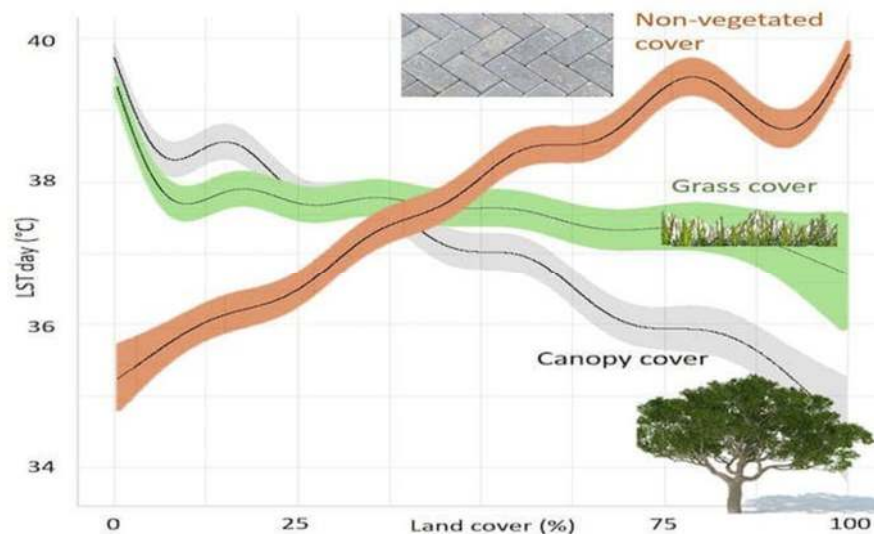
	<p>canopy for the wellbeing of all its residents.</p> <p>Yet the City continues to pursue destruction of the environment in the Wattle Grove rural zone.</p> <p>Protecting rural zone Wattle Grove is easily a first step the City can take to put into action the Draft Strategy vision it purports to hold.</p>	
	<p>Having said that the content of part 2 Introduction was welcome reading and shows a degree of acknowledgement by the City that development of the design, housing types and volumes that has occurred until now cannot continue.</p> <p>Anyone who lives in an area with good tree canopy knows the difference in air-conditioning use, heat retention of the dwelling and sense of general well-being offered by good tree canopy cover. On our own property on a hot day being under the area that is heavily treed is several degrees cooler than just metres away in an area with less native vegetation, in this regard I quote part of the introduction:</p>	Noted.
	<p>Many Local Government Areas of the Perth metropolitan area have set targets of a minimum 20% canopy cover across their cities to address heat sinks, improve overall community health and enhance landscape character. Yet urban forest canopy in approximately 60% of private land 1 in the City of Kalamunda's Swan Coastal Plain suburbs has been reduced to under 10%; and 78% of private land has less than 20% cover.</p> <p>Note: 1: Private land includes urban forest classified as street blocks, on the Swan Coastal Plain. This includes residential and industrial land.</p>	It is noted that the revised Draft UFS now includes an aspirational canopy cover target of 30%, City-wide in line with international benchmarking.

	<p>With the future pointing to the potential further loss of urban forest canopy in areas earmarked for development, it is important to limit this loss. For example, initial modelling for the Forrestfield North development suggests that the urban forest canopy could reduce from the current 30-40% to as low as 5-10% even with the proposed protection of vegetation in local reserves. This strategy will provide the tools to improve this for future developments in the City of Kalamunda.</p>	<p>It is noted that the initial canopy modelling for the Forrestfield North (now High Wycombe South) development was over simplistic and unlikely to represent the post-development canopy cover. This modelling did not account for the State R-Code tree planting requirements nor the modified (increased) tree planting requirements, canopy targets, replacement tree planting requirements and avoidance principle of Draft LPP 33- Tree Retention.</p> <p>This case study has been removed from the Draft UFS as a result.</p>
	<p>That this has continued to occur despite years of knowledge and acknowledgement of environmental stresses caused by tree canopy loss and heat island effect is entirely attributable to successive governments and regulators taking the short-term view of appeasing developers rather than taking a longer term view and protecting the environment and ultimately public health and well-being.</p>	<p>The UFS provides a long-term strategy to protect and enhance the City's urban forest.</p>
	<p>DEPARTMENT OF PLANNING, LANDS AND HERITAGE Statistical report: The urban forest of Perth and Peel CSIRO Urban Monitor</p> <p>As I am sure you are all by now aware Valcan Road Orange Grove and Wattle Grove is a no-through road sharing the boundary between the City of Kalamunda and the City of Gosnells. The City of</p>	<p>Noted. No specific comment on the Draft UFS.</p>

<p>Gosnells part of Valcan Road is the lower end and can be access only by travelling in two directions, one requires travelling 2km from the City of Gosnells boundary on Kelvin Road into the City of Kalamunda before re-entering the City of Gosnells in Valcan Road. The only other access route requires travelling approximately 6km through the City of Kalamunda council area before re-entering the City of Gosnells end of Valcan Road.</p>	
<p>I have long held the view, spoken at council meetings in multiple council areas and made submissions regarding protecting the environment.</p> <p>It is the responsibility of LGA's to protect their local environments. This means taking responsibility; not shifting responsibility to other authorities. The City, as with all LGA's approvals planning applications, developers like to have a blank canvas to develop and to achieve that they wantonly demolish native vegetation destroying the tree canopy and native habitat.</p> <p>It is easy for LGA's to stop this wanton destruction through their planning departments controlling land clearance for development and ensuring a substantial percentage of vegetation is retained and developers have to work around the vegetation. The long-term effects of the wanton destruction of native vegetation are being felt now; time is running out, councils must act now to protect the remaining environment.</p>	<p>Protecting and enhancing the City's urban forest is a shared responsibility between government agencies, local government and the community.</p> <p>The UFS includes actions within the City's sphere of influence, which aim to protect and enhance the City's urban forest, including but not limited to planning provisions. Of particular note is the action to implement the City's Local Planning Policy 33- Tree Retention (currently in draft), which outlines the City's expectation for trees to be retained in new development. Where unavoidable tree removal is approved, replacement planting at a higher ratio may be conditioned.</p>
<p>Just this week the following ABC report received media attention. REF: ABC Perth, 23 January at 20:01 pm. Please look carefully at the heat island effect diagram below and please refer to the media</p>	<p>Noted. The Draft UFS acknowledges the role of the urban forest with regard to urban heat island effect.</p>

report in full. Extract: 'With Australia's largest city (Sydney) facing 50-degree-plus summers, experts say its suburbs must be radically redesigned and rebuilt in order to remain liveable'.

In precis the article stresses that as a result of the mass destruction of tree canopy and the resultant heat island effect Australian cities will have to be redesigned to include underground living and activity to remain liveable, the concept of underground living is not new and is common in countries like Canada, due of course to opposite climatic conditions to Australia. It is not a way of living that results in a happy and healthy population as there is no direct daylight, no direct interaction with the natural environment and results in increased rates of depression in the population at large.



Urban heat is a key issue that the UFS seeks to address.

In some local council areas, including the City of Gosnells when an acreage is subdivided the council controls what vegetation removal

Noted. The Draft LPP 33-Tree Retention outlines the City's requirements with regard to tree retention,

<p>is permitted. Recent local acreage subdivisions by family and friends include that the property owner cannot remove any native trees or native vegetation of any type on their property without application to council and approval to do so, the LGA determined the building envelope area accordingly taking into consideration the placement of native vegetation. Several years ago we also subdivided our acreage property and the same tree protection applied and the City of Gosnells determined native trees and vegetation that could not be removed, tagged native trees accordingly and determined specifically the exact location of the building envelope. This resulted in an additional building cost of over \$50,000, a short-term financial pain but long-term protection of the environment.</p> <p>To clarify, I hasten to add that the blocks mentioned were all lifestyle acreages and horse properties not bush blocks.</p>	<p>protection, replacement and canopy cover targets relating to new development. The implementation of this LPP is reflected in the proposed actions of the Draft UFS.</p>
<p>The report titled 'The Urban Forest of Perth and Peel CSIRO Urban Monitor' published by the DPLH (Department of Planning Lands and Heritage) and CSIRO covers the period 2009 – 2016 and provides statistics on 'The Urban Canopy Cover of Perth and Peel'. The report data on tree canopy loss covered trees of three metres height and above.</p> <p>The community expects public servants and elected members to act ethically and they each have a duty to do so. I have referred to the report previously both in deputations and in submissions to the State Government and the City of Kalamunda and I sincerely hope that by now all council staff and councillors are familiar with the shocking content of the report as any council staff member</p>	<p>It is not clear which specific statistics the submitter is referring to. However, it is noted that the <i>Statistical report : the urban forest of Perth and Peel / CSIRO Urban monitor</i> (DPLH 2019) identified the City of Kalamunda as having one of the highest canopy cover gains in parks. The report also notes the significant gain in canopy cover in roads for local governments that are implementing active planting programs (mostly as part of their UFS).</p> <p>While the report identified many new development areas across the Perth Metropolitan Region as having a</p>

<p>preparing report content and any councillor voting on any issue related in any way to the environment can only do so responsibly when they fulfil their duty to the community they serve and make themselves aware of the alarming facts on tree canopy loss and heat island effect. Subsequent reports on tree canopy loss in the Perth metropolitan show the situation is continuing unabated. The report is horrifying yet the tree canopy destruction and destruction of flora, fauna and fauna habitat continues unabated. The report statistics on urban tree canopy cover; the rapid loss of urban tree canopy should concern every one of us; I have spoken to my peers and friends about this major environmental issue; an environmental catastrophe happening now, right here in our suburbs and our local environment, they are similarly horrified at the statistics in the report and the past myopic blinkeredness of governments at all levels that has permitted this to happen, yet it continues to happen aided by all levels of government and particularly local government who appear to see no responsibility towards our environmental future other than saying the right words at the right time.</p> <p>The City of Kalamunda as a local government has a large part to play in taking responsibility for these shocking statistics and now has the opportunity to right the wrongs of the past and act quickly to create policies to protect our tree canopy.</p> <p>In righting the wrongs of the past CoK must ensure that policies created to protect our rapidly diminishing tree canopy do not permit exemptions for any facilities whether aged care, residential developers or any other category. The tree canopy cannot be put at</p>	<p>reduction in canopy cover post-development, some suburbs experienced significant gain in canopy cover.</p> <p>The preparation and future implementation of the UFS will address protection and enhancement of the City's urban forest, within the sphere of influence of the City, including implementation of the LPP 33- Tree Retention which requires applicants to avoid the removal of existing trees where possible and to plant new trees associated with development to achieve minimum canopy targets and replacement planting ratios.</p>
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	<p>further risk of destruction. The tree canopy is the lungs of Perth, we destroy it at our peril.</p> <p>Whether trees are on private or public land trees create the environment for us all. Clearing native vegetation should therefore not be a decision for an individual property owner. Local governments must protect our environment. Local governments must take immediate action to halt this environmental disaster by creating policies to stop this loss of urban tree canopy.</p> <p>Overwhelmingly data collected by CoK determines that a priority for local residents is preservation of our treed environment.</p>	
	<p>Protect our urban tree canopy for future generations. The City is commended on the development of the ELUPS and efforts to protect our environment and rapid loss of urban tree canopy.</p> <p>I note that the ELUPS introduction states that 'green infrastructure' informs the distinctive character of the area and is an asset that requires protection, preservation and management. The term 'Urban forest' refers to any type of green infrastructure; all trees, shrubs, lawn and pervious soils in urban areas and moves beyond simply planning and considers the health, diversity and canopy of the whole urban area.</p>	<p>Noted.</p> <p>The revised Draft UFS provides a new definition for the City's urban forest. It is noted that the urban forest refers to trees >3 m in height. All other vegetation will be addressed through the City's Draft Local Biodiversity Strategy (Currently undergoing peer review).</p>
	<p>Whilst it is always preferred to protect our native species, for street tree planting in higher density areas there is neither the space or an identifiable purpose in using native species, generally speaking most</p>	<p>Noted. The Draft UFS includes a section on the function of trees which states; <i>'Consideration should be given to selecting a tree species with a canopy structure that is appropriate to the context of its specific planting</i></p>

	<p>species of natives are larger trees that may create issues with overhead power lines.</p> <p>In high density areas DECIDUOUS trees which permit sunlight to dwellings during winter yet create shade in summer and in doing so keep the environment cooler in summer when in leaf, and when dormant in winter following leaf loss in autumn, allow more warmth reducing power consumption year around. That said no-one can deny the value of larger native species.</p>	<p><i>site. For example, in outdoor eating areas a deciduous tree may be preferred over a native eucalypt as it will provide good shade cover in summer and allow sunlight through in winter when it is dormant. The selection of tree species where possible should focus on endemic species where possible.'</i></p> <p>The UFS is flexible with regard to species selection where the objectives of the strategy can be achieved.</p>
	<p>It is not good enough to allow private land owners to do as they like and remove established trees on their land, on our property in an adjacent LGA to CoK our council tagged our trees and we are not allowed to remove any trees despite us having planted them in the first place.</p>	<p>The City have appointed a full-time Senior Compliance Officer and actively investigate unlawful tree removal, as reported to the City. The City have recently, successfully prosecuted for unlawful tree removal under the <i>Planning and Development Act 2005</i>.</p>
	<p>I fully agree with this policy as after the watching the clearing of the MKSEA industrial area anyone who watched the cockatoos swarming around the sky day after day not knowing where to go would fully understand why we must protect our vegetation and trees, particularly mature native vegetation and trees. Much of the undergrowth vegetation relies on the mature tree canopy to survive and the undergrowth is habitat and food source for many small species of wildlife.</p> <p>The report titled 'The Urban Forest of Perth and Peel CSIRO Urban Monitor' published by the DPLH (Department of Planning Lands and Heritage) and CSIRO provides statistical data on loss of tree canopy of trees 3 metres high and above. Since becoming aware of the report I have spoken to many people about the report content and statistical data provided.</p>	<p>Noted.</p>

	<p>It is urgent that the City develops policies that recognise that across Australia urban tree canopy loss has become a major environmental issue and many LGA's are now responding positively to protect the urban tree canopy. In researching tree canopy loss across Australia I have found that tree canopy loss and loss of native ground covers is a major problem for LGA's right across Australia, not only in WA.</p> <p>In recent years many LGA's, in the eastern states have introduced policies to protect the tree canopy whether on private or public land and the eastern states trend is to set identifiable, achievable goals to retain existing green infrastructure and increase urban area tree canopy eg: 20 percent greener by 2020. The Draft Strategy appears to some extent to recognise this but although the Strategy process has to be followed we need action to be swift to reduce the destruction of our natural environment quickly.</p>	
	<p>The Draft Strategy does not go far enough with protecting the native flora and fauna. Nationally, native species are all protected and require approval before removal, however in most states this rule has until now only applied to rural areas. Until now only ACT and South Australia have had urban and rural blanket rules against removing native tree species with heavy fines imposed for non-compliant activity; an example from media reports is of tree lopper Greg Davies, of Coromandel Valley in the Adelaide hills, convicted in the Environment, Resources and Development Court for "tree damaging activity"; ie: removal of limbs from a Lemon Scented Gum (note damaging activity; not actually removing the tree). The tree</p>	<p>The revised Draft UFS provides a new definition for the City's urban forest. It is noted that the urban forest refers to trees >3 m in height. All other native vegetation, flora and fauna will be addressed through the City's Draft Local Biodiversity Strategy (Currently undergoing peer review).</p> <p>It is noted that other measures are currently in place for the protection of native flora and fauna, including but not limited to planning approval conditions for vegetation, flora and fauna management.</p>

	<p>lopper accepted the word of the householder but did not seek evidence of council approval to remove tree limbs. He was fined \$6,000. The maximum penalty for the offence is \$120,000. The severity of the possible fine is evidence that authorities in Adelaide are serious about protecting the urban tree canopy for future generations. In NSW breaching the terms of a Tree Protection Order has a maximum penalty in local court of \$110,000. Similarly in Victoria, Vegetation Protection Overlays (VPOs) are used by 63% of Victorian councils to specify local area protected vegetation and severe penalties are imposed for non-compliance. The City needs to not only have a system of protection but to enforce that protection, once individuals and particularly development companies are fined behaviour will change more rapidly.</p>	<p>As outlined above, the City have appointed a full-time Senior Compliance Officer and actively investigate unlawful tree removal, as reported to the City. The City have recently, successfully prosecuted for unlawful tree removal under the <i>Planning and Development Act 2005</i>.</p> <p>Further, native flora and fauna is protected under State and Commonwealth legislation administered by other government agencies such as the Department of Water and Environmental Regulation and the Department of Biodiversity, Conservation and Attractions.</p>
	<p>In recent years many eastern states councils have enacted policies to protect native trees and vegetation on urban private property, implementing programs to address factors that result in loss of urban tree canopy eg: not permitting total lot clearance by developers but ensuring tree retention; developers prefer to 'clean sweep' lots rather than design around existing trees but local governments have a responsibility to seriously consider the loss of wildlife and the long-term cost of this to the urban environment.</p> <p>A number of WA local councils now have policies to protect native vegetation and tree canopy to protect the urban forest. A good example of a sound, working strategy is the 'Town of Bassendean Urban Forrest Strategy 2016 – 2026'.</p>	<p>The City have been actively working to protect the urban canopy, including the preparation of LPP 33-Tree Retention (adopted December 2022) which requires applicants to avoid the removal of existing trees where possible and to plant new trees associated with development to achieve minimum canopy targets and replacement planting ratios.</p>

	<p>My research on individual councils and their policies discloses acknowledgement that to encourage compliance, penalties imposed for non-compliance must be enforced and must be severe. Damage and or removal of significant trees, or canopy trees results in degradation of established character, particularly in a hills LGA like CoK.</p> <p>Councils and Councillors have an obligation to enact policies that reflect the wishes of the majority of residents, who in a number of surveys and local online pages have expressed their wish to retain the treed environment the council area is noted for. The City needs to acknowledge repetitively to residents that they will protect our precious environment and that native trees, tree canopy and vegetation in the urban environment has a series of environmental benefits such as reducing the impact of the urban heat island effect, reducing the effects of climate change, reducing temperatures in and around buildings, reducing stormwater runoff as tree roots absorb the water, absorb pollution, provide habitat and promote biodiversity.</p> <p>Some LGA's continue to be unwilling to recognize or acknowledge the major environmental problem resulting from development biased towards keeping developer costs lower rather than protecting our environment.</p> <p>Through the Draft Strategy and then the final Strategy Council and Councillors can ensure that CoK is an LGA that is willing to acknowledge tree canopy loss as a major environment problem and join those forward thinking WA LGA's that are already proactive and</p>	
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move towards formulating initiatives to reverse the trend of horrific tree canopy loss within CoK boundaries.

Local governments must become proactive in protecting our environment; as a hills council, the CoK with its stated Guiding Principle to ensure environmental sustainability the City has environmental community responsibilities that residents and ratepayers can and should expect elected members to abide by.

Canopy trees are valuable because of:

- Canopy size
- Heritage value
- Aesthetic value
- Functional purpose (shade, habitat, avenue windbreaks) enhance and beautify landscapes
- Improves the look of our neighbourhoods
- helps block unwanted views
- reduces heat island effect by providing shade and shelter
- protects the health of our soils
- moderates wind and absorb pollutants
- reduces noise and dust levels
- provides habitat for wildlife and biodiversity; and
- supports the sustainability of our environment and community
- Reduces impact of flooding / Reduce impact of drought
- Improved waterway health
- Improved soil health
- Improves air quality
- Improves habitat and biodiversity
- Reduces greenhouse emissions

	<ul style="list-style-type: none"> • Improves human physical health • Improves human mental health • Lessens impact of urban growth • Improves precinct management <p>The City of Kalamunda is in the unique position of having areas worthy of protection under its authority and must recognise the responsibility that ensues from that.</p> <p>Residents of the City of Kalamunda and immediately surrounding areas hold strong connections to the environment; the ambience of a treed, natural environment is why people choose to reside in a hills environment as a desirable location.</p>	
6.	<p>The community of Kalamunda included within this Local Authority perhaps subconsciously assume that we still live in an afforested area by continuing use of the Whadjuk Noongar language description 'Home in the Forest)</p> <p>However that today is very far from reality as the Draft Strategy outlines in the 'Introduction'. The eastward sloping Darling Plateau is still predominantly mature tree covered and cooled by that shade effect, but the sloping Escarpment that includes the Kalamunda town centre is increasingly surrounded by dual-density multi-unit treeless residential blocks. Also, the large area of Foothills sites close to the Perth International Airport have been for several decades approved through the Development Planning process for intensive clearing of vegetation and dense urbanisation without any consideration to planting of trees for either shade or amenity for the occupants.</p> <p>Although the City has a so-called 'Environmental Land-use Planning Strategy' (ELUPS), that has not seriously addressed the reality of a long known and recorded change of climate in SW WA that has been on average notably warmer and drier for several recent</p>	<p>Noted. The Draft UFS includes goals to protect and enhance the City's urban forest and specific actions to assist with achieving these goals, within the City's sphere of influence.</p> <p>The City have also developed a Draft Climate Change Action Plan to further assist with mitigation and management of impacts associated with climate change.</p>

	<p>decades. (Most freshwater Dams are now only partially filled and tree growth will have slowed.)</p>	
	<p>Extremes in Foothills localities - Furthermore and rarely mentioned, the vast CoK Foothills area from the City of Swan to Gosnells boundaries, apart from a very few small Reserves adjacent to sports complexes (that are themselves treeless); due to being in a conflicted microclimatic zone from late Spring through Summer and into Autumn is at least 3deg.C hotter than either the Escarpment or areas westward beyond the Airport. The intense overnight Easterly and gully winds continue much longer in this zone until the cooling westerly sea breezes arrive usually much later than elsewhere.</p>	<p>The Draft UFS includes actions to prioritise tree planting efforts on public land with the lowest urban forest canopy cover. By nature of the current canopy cover on the Swan Coastal Plain, these areas will be targeted for planting as a priority which will, over time, assist with mitigating urban heat island effect.</p>
	<p>Useful theoretical introduction - This Draft Strategy prepared by external consultants provides a useful theoretical guide to contemporary research into the causes and effects of surface warming and cooling and the benefits of enhanced tree-canopy cover.</p> <p>Development Planning implications - However, it does not address the immediate practical issues of halting and reversing still on- going Development Planning policies by City of Kalamunda that have, and are still causing gross loss of trees and resultant increasing 'heat-island' warming.</p>	<p>Noted.</p> <p>The City have been actively working to protect the urban canopy, including the preparation of LPP 33- Tree Retention (anticipated to be adopted December 2022) which requires applicants to avoid the removal of existing trees where possible and to plant new trees associated with development to achieve minimum canopy targets and replacement planting ratios.</p>
	<p>This draft is too generalised to adopt -</p>	<p>Heat mapping has been moved to Appendix 1 of the UFS. The intent of the heat mapping is to demonstrate urban heat island effect, being, where the environment</p>

	<p>The interpretation of heat mapping in this lengthy Draft is far too crude and generalised and the photographic illustrations are frequently misleading.</p> <p>In the case of Kalamunda Town centre a failed 2018/19 'Activity Centre Plan' by other external consultants is uncritically embraced , including a 'Landscape Master Plan' that was in fact physically impractical. (It seems that consultants GHD failed to notice that roads surrounding that Town centre are not wide enough to allow tree planting in the centre of them and still retain essential kerb-side parking!) Also, there are far more large well-established street trees in Barber Street, lower Haynes Street and City Square up to Central precinct than these and other external consultants are so far willing to admit.</p>	<p>is more built up and canopy cover is low, temperatures are higher.</p> <p>The UFS includes the Kalamunda Town Centre as a case study area. The Landscape Master Plan is conceptual and subject to detailed design on a staged basis. In reviewing the outcomes of the completed Central Mall works, a net gain of 21 trees was achieved.</p>
	<p>Community ethos - External consultants unfamiliar with local preferences must realise that a large percentage of the Kalamunda/Lesmurdie community made a deliberate choice long ago to live in these localities because of a 'tree change' escape from intense urban living; and are still reluctant to alter that predominant preference. That represents a continuing rate-paying community demand (that should be more explicit in the CoK forward Strategic Community Plan). Most local residents will accept an effort in principle by the Local Authority to plant more trees and alter Development Planning directives to enforce that outcome locally; but the practical consequences will require a much larger financial budget and associated employed expertise than is currently in place. (This writer bases that comment on attending seminars and workshops by</p>	<p>The UFS outlines that an annual implementation action plan will be developed by a working group which will identify the required staff and financial resources for a given year.</p>

	<p>other WA Local Authorities, who have operated substantial Urban Forest programmes already for at least 3 years.)</p>	
	<p>Complexities not explained - To be enduring and successful, careful choice of species for shade and suited to different locations is complex and extensive collaborative liaison must be negotiated with local residents. Adequate ground water and intense on-going maintenance for at least 18 months is essential and represents a new and continuing major financial commitment for this Local Authority.</p>	<p>The UFS includes actions to review practices and procedures, and develop technical guidelines for tree selection, species, procurement, planting (e.g. rootable soil volume), replacement, maintenance, removal, risk management (e.g. dieback management), habitat and best practice management across the public and private land.</p> <p>Ongoing maintenance of trees on public land is an existing practice of the City. It is noted that an increase of trees on public land will necessitate additional planting and maintenance budget.</p>
	<p>Realities of delayed response - Although not mentioned in this daft , the current reality as researched nationally throughout Australia by RMIT, is that City of Kalamunda is bar one other, the worst Local Authority area in Australia for loss of tree cover.</p> <p>Since the current State Government is apparently offering \$100 million to WA Local Authorities for additional Urban Forest initiatives to confront climate change, CoK should obviously take an immediate initiative to urgently document a comprehensive programme and compete for that funding - bearing in mind that as yet, compared to many other Local Authorities in WA, it has no established track-record of having an existing programme.</p>	<p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and</p>

		<p>2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p> <p>The UFS includes an action (Action 4.1) to develop a business case to advocate for increased government funding for tree planting programs.</p>
	<p>Contradictions in Strategic Planning - Several examples follow that illustrate failures of local Strategic Planning to address climate- change, that conflict with the objectives of an Urban Forest intensification Strategy</p> <p>Development Planning under City of Kalamunda supervision close to the new Forrestfield North/ Maida Vale Railway Station shows a large area of sound mature shade-trees (mainly Marri) alongside Brae Road to be cleared altogether and replaced by intensely high-density residential housing. Those trees are in fact habitat for Black Cockatoos that commute daily to forage on trees remaining in patches on the Escarpment around Kalamunda. (Consequence - greatly increased heat-island effect and risk to threatened species biodiversity.)</p> <p>A substantial land area adjacent to, but not part of the MKSEA, alongside Welshpool Road East fully under the jurisdiction of City of Kalamunda, as mapped has approx.60% mature shade tree cover but is already being partly clear-felled for unspecified industrial use. That area spans across to Tonkin Highway and includes the Yule Brook outfall from Lesmurdie Falls (National Park), feeding the adjacent high biodiversity value Brixton Street Wetlands conservation Reserve. Yet Yule Brook and its often wooded surroundings is under imminent threat from a recent City of Kalamunda employed external Planning consultants proposal to</p>	<p>Development of the High Wycombe train station is outside of the City's Scheme Area and is administered by DevelopmentWA.</p> <p>The adjoining future urban development area "High Wycombe South Residential Precinct" and Wattle Grove South will undergo development in accordance with the City's Local Planning Policy 33- Tree Retention which requires 20% canopy cover to be achieved for urban developments. Additionally, it is anticipated that the majority of existing tree cover in future local open space will be retained, and all tree cover in environmental conservation areas will be retained.</p> <p>The MKSEA area within the City of Kalamunda had a pre-development canopy cover of 30%. Post-development tree canopy predications anticipate that the tree cover at maturity will achieve approximately 14% cover through landscaping on private land and tree planting in road verges which will be undertaken in accordance with the City's Local Planning Policy 19- MKSEA Design Guidelines. It is noted that existing industrial estates across the Perth Metropolitan area</p>

	<p>rezone that area that also extends between Tonkin Hwy and Lewis Rd. for high-density residential housing.</p> <p>A nearby substantially mature tree covered and professionally verified biodiverse land area currently zoned Rural, named Wattle Grove (South) or 'Crystal Brook' is also under imminent threat by City of Kalamunda and private sector Developers for clearing, to be replaced by undeclared areas of high-density housing on very small blocks. All obviously counter-productive to this Urban Forest Strategy.</p>	<p>predominantly achieve 0-5% canopy cover (based on DPLH urban forest data mapping).</p> <p>High Wycombe South Residential Precinct, MKSEA and Wattle Grove South have been included as a case study areas in the UFS.</p>
	<p>Conclusions -</p> <p>While the City of Kalamunda must be commended for belatedly considering a Council proposal, supported by its Environmental Advisory Committee, to adopt an Urban Forest Strategy throughout its different districts; implementation will not only be costly but must also involve significant review and change to current Development Planning policies,.</p> <p>This Draft Urban Forest Strategy prepared by external consultants is only a preliminary introduction and is still very far from detailing a complex Tactical programme of action for costing and early implementation.</p>	<p>The UFS includes a detailed action plan. The UFS outlines that an annual implementation action plan will be developed by a working group which will identify the required staff and financial resources for a given year.</p>
7.	<p>I regard it as essential for the City of Kalamunda to protect the remaining urban forest in the City by retaining the rural and semi-rural land use zonings of land within our City boundary and, in particular, the rural zoning of Wattle Grove South, a known unique and environmentally sensitive area.</p>	<p>This is not factually correct. It is noted that the State Environmental Protection Authority are formally assessing the potential environmental impacts of the Scheme amendment (123.5 ha currently initiated) of the Wattle Grove South area under Part IV of the EP Act. If approved, any future development within the</p>

	<p>As you know, the Environmental Protection Act specifically regulates the clearing of native vegetation and tree canopy in areas where land is zoned rural /special rural/rural residential. These protections do not exist in areas zoned for residential sub-division.</p>	<p>Wattle Grove South area will be in accordance with the requirements of the EPA in addition to the City's Scheme and local planning policies (e.g., LPP 33- Tree Retention).</p>
8.	<p>This Strategy is a welcome, if long-overdue initiative. The significant work of those involved in its preparation should be recognised and applauded. Acknowledging the challenges posed by the changing climate and the increasing demands for increased density, is a first step. All this good work will be wasted unless councillors and staff ensure future budget allocations permit the required actions to be taken. Failure to do so will compromise the success of the strategy.</p>	<p>Noted.</p>
	<p>2. Introduction. "For example, initial modelling for the Forrestfield North development suggests that the urban forest canopy could reduce from the current 30-40% to as low as 5-10% even with the proposed protection of vegetation in local reserves. This strategy will provide the tools to improve this for future developments in the City of Kalamunda." The Submitter submission on the Forrestfield North Residential Precinct Local Structure Plan, welcomed the emphasis placed on the retention of natural environmental assets. We did, however, have reservations over the degree to which the City of Kalamunda would achieve its vision of creating a "forest neighbourhood", particularly at the Subdivision and Development Approval stage. The above modelling, showing such a dramatic reduction of the urban forest canopy, indicates our reservations were justified. It is</p>	<p>The estimate of post-development tree canopy cover in the Draft UFS 2020 was over simplified and also did not take into account state and local government planning policies providing for tree retention and planting, which have since come into effect. The revised UFS provides an updated case study for the High Wycombe South area (previously referred to as Forrestfield North). Post-development canopy cover is estimated to be 26%, noting this prediction suggests that there will be no change in canopy cover once replacement tree plantings reach maturity. The High Wycombe South area retains 25% of precinct area as Local Open Space and Environmental Conservation areas, which far exceeds the State policy requirement for 10% Public Open Space.</p>

	<p>essential this draft Strategy be approved if future losses are to be curtailed.</p>	
	<p>What is an Urban Forest? Whilst tree canopy cover is a convenient measure and its contribution to combatting the Heat Island Effect well-established, it is encouraging to see the importance of understorey vegetation clearly acknowledged.</p>	<p>The UFS includes the following definition for the City's urban forest: All trees greater than 3m in height that occur within the City of Kalamunda except for:</p> <ul style="list-style-type: none"> • trees within the Perth Airport locality; and, • trees on land reserved as state forest, national parks, and regional parks. <p>While understory vegetation is critically important, urban forest strategies generally focus on the tree canopy. Tree canopy cover is one of the most important measures for shading, cooling, and neighbourhood amenity.</p> <p>Understorey native vegetation will be addressed through the City's Local Biodiversity Strategy.</p>
	<p>Purpose of the Urban Forest Strategy. "...an Urban Forest Strategy must consider vegetation from a holistic view, considering both public and private land and different land tenures." Whilst this statement is welcomed, the Strategy goes on to describe the limitations of local government in tackling problems arising from this view. Where loss of vegetation occurs on land beyond the control of the City, the implications of this loss on this strategy, must be assessed and compensated for by increased revegetation on land under the City's control. The protection of "high-value</p>	<p>The UFS includes measures to protect and enhance the urban forest on private land through the implementation of LPP 33, compliance action for unauthorised tree removal and engagement campaigns to educate and empower the community. They key goals of the UFS are now to protect and grow the urban forest, engage the community and investigate resourcing and research opportunities.</p>

	<p>vegetation” on private land, will require considerable effort by staff and councillors, given the historic and oft-declared opposition of some representatives to any interference with the rights of landowners. The key may lie in educating landowners to the value of that vegetation or providing some tangible incentive to the landowner for its preservation. Defining the purpose of the Strategy by basing it on community feedback, ensures the aspirations of the community are being catered for. This, in turn, should ensure the support of that community.</p>	<p>The City is currently implementing LPP33 for new planning applications and is also successfully implementing compliance process to protect and replace trees.</p> <p>The City will undertake tree planting on public land (road verges and parks) in accordance with available resources.</p>
	<p>Figure 2. City of Kalamunda Strategic Environmental Framework. Although simply a schematic, it gives no assurance that, throughout the process, there will be no ‘disconnect’ between Environment and Planning. Past experience has shown such a disconnect between City departments, resulting in environmental setbacks. At one stage, there was a proposal to establish a Planning and Environment section, designed to avoid such breakdowns in communication. Submitter, in past submissions, has pressed for having an ‘environment in all decisions’ concept accepted, in the same way ‘health and safety’ features in all decisions.</p>	<p>The City now has an Environmental Planner in the Strategic Planning and Statutory Planning departments. The UFS peer review and development of the revised Draft UFS has been coordinated by the City’s Environmental Planner. The adoption of LPP33 is also a key milestone in ensuring protection and enhancement of the City’s urban forest, relative to new development proposals.</p>
	<p>What are the benefits of an Urban Forest? “A significant volume of research, in WA, Australia and Internationally, has demonstrated the economic, environmental, psychological and physical health benefits provided by Urban Forests.” One would expect the creation of such a valuable community initiative to receive overwhelming support. The benefits are well described in this draft, well supported by the above mentioned research and should convince the council that urgent</p>	<p>The estimated of post-development tree canopy cover in the Draft UFS 2020 was over simplified and also did not take into account state and local government planning policies providing for tree retention and planting, which have since come into effect.</p> <p>The revised UFS provides an updated case study for the High Wycombe South area (previously referred to as Forrestfield north). Post-development canopy cover</p>

	<p>implementation of the final Strategy document is urgently required. The benefits of such a strategy have been known for some time (several Local Government Authorities have had such strategies in operation for up to ten years). The City's environmental consultants, in plans for projects such as Forrestfield North, echoed the elements of this Strategy, yet clearing of valuable native vegetation has continued unabated (see earlier comments on Residential Precinct Local Structure Plan).</p>	<p>is estimated to be 26%, noting this prediction suggests that there will be no change in canopy cover once replacement tree plantings reach maturity. The High Wycombe South area retains 25% of precinct area as Local Open Space and Environmental Conservation areas, which far exceeds the State policy requirement for 10% Public Open Space.</p>
	<p>Social and community health benefits "Trees naturally filter air, and so planting vegetative barriers along transport corridors can be beneficial for removing diesel particulate matter and decrease residents' exposure..."</p> <p>Despite research supporting this statement, including the Canberra Urban Forest project (placing the value of "energy reduction, pollution mitigation carbon sequestration" at US\$ 20-60 million) and a U.K. study on the "removal of atmospheric particulate pollution by urban tree canopy of London" , more recent research suggests the need for more careful studies to be conducted.</p> <p>"Plant selection is one of the most important components in an environmentally sustainable program to keep our cities healthy and thriving." (Ferrini, F., Fini, A., Mori, J. & Gori, A. (2020). Role of vegetation as a mitigating factor in the urban context. Sustainability, 12, 4247, Basel, Switzerland: MDPI.).</p> <p>Given that this study is focussed on the same climatic conditions as those enjoyed by Perth (i.e. Mediterranean), it could be a valuable resource.</p>	<p>Noted. This resource may be considered in developing the technical guide under action 1.5 of the UFS.</p>

	<p>These benefits are but the main ones. Many more could be included for the benefit of 'doubters', with perhaps more references for residents interested in this topic.</p>	<p>For the purpose of keeping the document succinct and digestible only the key benefits have been listed and summarised in the UFS report body. Further detail is provided in Appendix 1 of the UFS.</p>
	<p>The relationship between Urban Forest Canopy Cover and Urban Heat Island Effect.</p> <p>It has been widely accepted for some time that, increasing canopy cover will reduce the ambient temperature of a location. Dramatic temperature images of unshaded and shaded streetscapes provide the incontrovertible evidence. The Heat Island figures make a convincing argument. The contribution of air conditioners to the effect is often forgotten. Air conditioning is increasingly required in 'scorched earth' subdivision developments.</p>	<p>Noted.</p>
	<p>How do we increase our urban forest? 1.10. Goals Swan Coastal Plain Area</p> <p>This is the area most at threat of vegetation and tree cover loss. It should be given the highest priority and adequate budget funding to ensure the implementation of the strategy takes place smoothly. Given that the infill requirements of the State Government are contributing to the loss of canopy, should they be requested to make funding available to the City through specific Urban Forest grants?</p>	<p>The UFS includes an action to identify and prioritise the plantable places on roads and parks where urban canopy can be increased across the City, to assist with achieving the target and objectives of the UFS. This action will result in planting being prioritised in areas of lowest canopy cover, such as the Swan Coastal Plain suburbs.</p> <p>The UFS also includes an action to develop a business case to advocate for increased government funding for tree planting programs.</p>
	<p>Action Plan. Strategy 4. Action 4.8</p> <p>"Undertake a review of all City-managed reserves (including reserve purpose) to identify opportunities to revegetate underutilised</p>	<p>Noted. The allocation of a priority category has been removed from the UFS. Actions will be prioritised by an</p>

	<p>spaces, including increasing urban canopy through planting (combine with implementation of the Local Biodiversity Strategy and Public Open Space Strategy)".</p> <p>Whilst it is comforting to see so many actions given a "High" priority, given the environmental importance of both these strategies, this action also deserves a "High" priority.</p>	<p>internal working group who will develop an annual implementation action plan each year.</p> <p>It is noted that this particular action is already under consideration through the City's POS Working Group.</p>
	<p>Strategy 6. Action 6.1</p> <p>"Through the implementation of the Environmental Land Use Planning Strategy investigate the implementation of a local planning policy to address clearing of significant trees on private property."</p> <p>It is essential that the problem of private land clearing is addressed and that any policy created has sufficient powers to tackle this problem effectively. Such a policy will doubtless face some opposition in Council, as the failure of past proposals will attest.</p>	<p>LPP 33 was adopted by Council in December 2022. The purpose of LPP33 is to carefully consider the need for the removal of trees of a particular size and maturity and to minimise the removal and impacts to these trees through the planning and development process. LPP33 also seeks to increase canopy cover with planting provisions for new developments which vary the State R-Code requirements for lots coded R25 or lower. LPP 33 also includes provisions for replacement tree planting for unavoidable tree removal. The implementation of LPP 33 is a key action which will assist with achieving the aspirational target and goals of the UFS.</p>
	<p>6.2</p> <p>"Through the implementation of the Environmental Land Use Planning Strategy incorporate a provision in the Scheme allowing the City to require rehabilitation of land where an owner or occupier has caused or allowed land to be cleared, managed or degraded in such a way as to cause environmental harm or to adversely affect the amenity of adjoining or nearby land."</p> <p>This action may ensure the problem is addressed. See above comments.</p>	<p>Noted. Draft scheme provisions have been prepared to require rehabilitation of land, which are proposed to be included in the City's Local Planning Scheme 4 (in draft).</p>

	<p>Strategy 7. Action 7.1 “...develop a local planning policy to support the retention of urban forest on newly created lots as part of structure planning, subdivision and development...”</p> <p>This action is long overdue and its proposal is welcomed. It is also essential that areas declared to be retained on such lots are carefully monitored. Past examples have shown that areas intended for retention, have ‘accidentally’ been cleared. In such instances, “replacement planting or contribution to Council”, should be at a far higher rate than that where “it is not possible to retain urban forest”.</p>	<p>LPP 33 was adopted by Council in December 2022. The purpose of LPP33 is to carefully consider the need for the removal of trees of a particular size and maturity and to minimise the removal and impacts to these trees through the planning and development process. LPP33 also seeks to increase canopy cover with planting provisions for new developments which vary the State R-Code requirements for lots coded R25 or lower. LPP 33 also includes provisions for replacement tree planting for unavoidable tree removal. The implementation of LPP 33 is a key action which will assist with achieving the aspirational target and goals of the UFS.</p>
	<p>Strategy 8. Action 8.3 “...target planting in specific areas including industrial areas...”</p> <p>Assigned “Medium” priority, it is essential this be given “High” priority. Through ‘infill’ and land development pressures, the Swan Coastal Plain is the area most likely to be generating the heat island effect. Within the Swan Coastal Plain, industrial areas will be the main generators of this effect, becoming ‘super HIE generators’. This will have a dramatic effect on adjacent or ‘downwind’ residential areas when the heated air masses migrate to the residential blocks. These super-HIE-generators should not be considered in isolation when assessing the need for improved canopy cover.</p>	<p>Noted. The allocation of a priority category has been removed from the UFS. Actions will be prioritised by an internal working group who will develop an annual implementation action plan each year.</p> <p>The UFS includes an action to identify and prioritise the plantable places on roads and parks where urban canopy can be increased across the City, to assist with achieving the target and objectives of the UFS. This action will result in planting being prioritised in areas of lowest canopy cover, such as industrial areas.</p>
	<p>Conclusion. Whilst fully endorsing all the strategies (with the above suggested modifications) it is an oversight not to include some consideration of</p>	<p>Bushfire is now identified and discussed as a constraint to the City’s urban forest in the UFS.</p>

	<p>the overall effect of this welcome strategy on bushfire level threat within the City. It is hoped that the relevant bodies within and outside the City had input into the draft at some stage. The final strategy should detail any such consultation and the end result of such discussion on the final draft.</p> <p>The draft Strategy is welcomed and addresses, in varying degrees, the environmental and health concerns of the residents. Whilst Strategy 6. "Maintain trees and other vegetation on private property" addresses the 'elephant in the room', it is essential that long-overdue action be taken. There will be substantial opposition to any reduction in a landowner's right to do whatever he/she likes on the block of land. Using the ELUPS "to incorporate a provision in the Scheme", may be the only way to tackle this longstanding problem.</p> <p>Recent research has suggested that, regardless of the success of a local authority in retaining tree cover on lands for which it is responsible, failure to address the topic of tree preservation on private land, will always lead to increasing canopy loss.</p> <p>Submitter appreciates the opportunity to comment on the draft and congratulates staff involved on the work done.</p> <p>For information only. Errata in draft document. p.7 dot point three. Replace "buy" with "by". p.33 Replace "Floodeed Gun" with "Flooded Gum".</p>	<p>The implementation of LPP 33 is a key action which will assist with achieving the aspirational target and goals of the UFS.</p> <p>Additionally, the City have appointed a full-time Senior Compliance Officer and have recently, successfully prosecuted for unlawful tree removal.</p>
9.	<p>Response to City of Kalamunda Urban Forrest Strategy (Draft)</p> <p>The City Council received a substantial Petition one year ago at the Annual Electors Meeting, calling for substantial and immediate local action to combat Climate Change. So far as can be observed the</p>	<p>The City's draft Climate Change Action Plan and UFS are key strategies being considered by Council in February.</p> <p>LPP 33 was adopted by Council in December 2022. The purpose of LPP33 is to carefully consider the need for</p>

	<p>only action taken was to refer the subject to its Parks Department and an Advisory Committee that includes some Councillors.</p> <p>The only related positive outcome during the last twelve months seems to be reference to external consultants to advise on a possible Draft Urban Forest Strategy.</p> <p>Then in that draft, a list of minor proposals (pages 36/37) supposed to increase planting of shade trees generally. All somehow expected to reduce the current very substantial heat island effect across the City region that has resulted from massive clearance of native vegetation (under City supervision) by commercial and private developers.</p> <p>The target timetable to complete even this modest action is still seven years away “by 2028” and even then most of the actions proposed are minor, even relying on expanding community Friends Groups to do planting.</p> <p>With this extremely low level of serious commitment compared to some other Local Authorities, young people in our community who are becoming increasingly concerned about their future, will be appalled and expect this region to become less comfortably habitable and even less energy efficient than it currently is.</p>	<p>the removal of trees of a particular size and maturity and to minimise the removal and impacts to these trees through the planning and development process. LPP33 also seeks to increase canopy cover with planting provisions for new developments which vary the State R-Code requirements for lots coded R25 or lower. LPP 33 also includes provisions for replacement tree planting for unavoidable tree removal. The implementation of LPP 33 is a key action which will assist with achieving the aspirational target and goals of the UFS.</p> <p>The implementation timeframe of the UFS has been increase to a 20 year period (2023-2043) based on the significant number of actions proposed and the considerable resources required for implementation. The aspirational target of the UFS and the implementation timeframe are consistent with national and international benchmarking completed as part of the review of the UFS.</p>
10.	<p>'The City of Kalamunda is committed to an environmentally sustainable future. At a time when climate change and urban growth pose challenges to Kalamunda's 'Clean and Green' environment, the City seeks to conserve and grow its urban forest canopy for the wellbeing of all its residents.'</p>	<p>It is noted that the State Environmental Protection Authority are formally assessing the potential environmental impacts of the Scheme amendment (123.5 ha currently initiated) of the Wattle Grove South area under Part IV of the EP Act. If approved, any future development within the Wattle Grove South area will</p>

	<p>It is admirable the City of Kalamunda is seriously considering the benefits of urban forest and setting conservation plans in place for future generations. We endorse and fully support this vision.</p> <p>For us personally, it is a bit like 'After the horse has bolted.' An area close to our hearts and of particular importance to us as residents and rate payers is Wattle Grove South. An area which is scientifically known as unique and environmentally sensitive. On our property alone, an abundance of wildlife abounds. Every evening all species of birds come in to drink from the water troughs, including endangered red tailed cockatoos, then rest in the trees at night. It was so disappointing to observe the number of councillors at the November 2020 Council meeting, who did not support the majority of residents request to retain the rural/semi-rural zoning of this area, thus paving the way for developers to destroy/pillage this environment. (Yes as no doubt you know, developers are already on the band wagon in this area and it is obvious they must have enormous influence with regard to zoning/re-zoning)</p> <p>We firmly believe it is of paramount importance the City of Kalamunda protect the remaining mature urban forest and tree canopy, by retaining the rural and semi-rural land use zonings within our city boundary.</p> <p>It is one thing to maintain mature/old growth tree canopy and another to destroy old growth and then re-plant. We all know how long it takes for a tree to reach maturity.</p>	<p>be in accordance with the requirements of the EPA in addition to the City's Scheme and local planning policies (e.g., LPP 33- Tree Retention).</p>
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We note in the draft strategy, acknowledgement of the heat factor. Recently on the Channel 7 news it was reported Australia clears 200 thousand square metres every year, resulting in suburbs I referred to in my November 2020 submission to council as 'A sea of roofs' and referred to in the above report as Heat Islands - Treeless Suburbs.

Developers move in and totally annihilate the land. Bulldoze mature trees, many, many years old. The natural tree canopy of an area totally destroyed. We need tree canopy maintained within suburban areas, not just in national parks, bush reserves or public parks. As previously stated, we need to maintain 'old growth,' rather than destroy and replant.

In an article I read recently, the very truth of this quote by Sir David Attenborough attracted my attention.

"Our well-being, our economies, everything depends on a healthy planet, and yet we continue to neglect it."

Sir David Attenborough

The article went on to say: 'The natural world is in crisis.'

Scientists have warned that up to a million species could be driven to extinction this century. In the last 50 years, the world's wildlife populations have fallen by 70%, with nature being pushed to the brink by deforestation, land conversion and poaching.

	<p>This destruction of nature is also harming the ability of ecosystems to absorb and store carbon emissions, exacerbating the climate crisis.'</p> <p>Let us be the change so badly needed. Let us make a difference.</p> <p>As already stated, we fully endorse and support the vision of the Urban Forest Strategy and any efforts to maintain urban forest and tree canopy. Let's prevent further environmental destruction to our beautiful, natural environment. It is important too, that all councillors are on the same page with regard to the Urban Forest Strategy and our wish would be that they would support the majority, as in any true democracy.</p>	
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