



3 May 2018

Strategic Planning Department
Whittlesea City Council
25 Ferres Boulevard
SOUTH MORANG 3752

6 Parliament Place
East Melbourne
VIC 3002

Email: conservation@nattrust.com.au
Web: www.nationaltrust.org.au

T 03 9656 9818

Re: Whittlesea Planning Scheme – Planning Scheme Amendment C221

Dear Sir/Madam

Thank you for the opportunity to respond to the Whittlesea Planning Scheme Amendment C221, *River Red Gum Protection Policy*. The National Trust of Australia (Victoria) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy. We are the state's leading advocate for the protection of trees. We strongly support this amendment which seeks to strengthen the River Red Gum Protection Policy.

The National Trust maintains a Significant Tree Register recognising individual trees, avenues and important stands as valuable community assets that must be preserved. Since 1982 the National Trust has classified over 2,200 significant trees contributing to the recognition and protection of our environmental heritage across Victoria. Trees on the Register in Victoria are increasingly covered by local government planning schemes, overlays and tree controls, but many still have no statutory protection. It is of great concern to the Trust that increasing numbers of important trees, some ancient and rare, are being lost through poor management practices, inappropriate planning and development, and incremental deletion.

The National Trust therefore commends the City of Whittlesea for undertaking this consultation to strengthen planning mechanisms to protect River Red Gum trees across the municipality. Indeed, the City of Whittlesea is known for its remnant River Red Gums, which are enjoyed by residents and visitors alike.

We support well considered policies that protect the longevity of Melbourne's urban forest, in particular the protection of significant trees on public and private land; the provision of additional canopy cover to mitigate the heat island effect and provide health benefits to the community; the creation of healthier ecosystems with a greater diversity of species; the wise use and reuse of water; the multi-tiered sign off process for tree removals; the recognition that trees contribute economically and socially as well as environmentally to cities and suburbs; and the promotion of community engagement and participation. This submission provides some comments for consideration as the City of Whittlesea considers a response to community feedback.

We consider that the emphasis on the “proper planning and careful site assessment at the very start of the process of urban development” is extremely important, recognising that this is the best way to ensure the ongoing viability, protection and enhancement of significant trees throughout development processes. We agree that it is essential that the City of Whittlesea’s significant River Red Gums are treated as an integral component of any development designs.

With regards to the Policy outlined in the Amendment, we support the strengthening of this document through reference to both urban and rural areas; recognition of areas undergoing conversion to urban uses; the prioritisation of retention, protection and incorporation of mature River Red Gums in design; the recognition of juvenile River Red Gums; guidelines for the siting of retained River Red Gums including lot size; removal to only occur when there is risk to life or property; and the use of tree protection zones (TPZ).

With regards to any potential removal of a River Red Gum, we submit that the policy could make reference to the habitat potential of dead/removed River Red Gums. We suggest that safely retaining the wood of dead or removed River Red Gums contributes positively to the overall habitat and ecology of the region.

We strongly support the use of TPZ on development or subdivision sites to protect River Red Gums through this policy. We note that the City of Whittlesea has developed its own Tree Protection Zone Standard, dated November 2014. While we support the use in this document of an extended TPZ that takes into account the unique habitat of River Red Gums, we maintain concerns that this document states: “Council's tree protection zone guideline shall supersede AS4970 2009 and/or any other tree protection zone standard/calculation.” We submit that the AS4870-2009, *Protection of trees on development sites* contains further information regarding tree protection standards beyond the TPZ such as further tree protection measures, monitoring and certification, and as such could be usefully included as a reference in the Policy. This would help strengthen a holistic approach to tree protection that takes into account more than simply the TPZ.

Comments for consideration in future planning scheme amendments

We would like to take this opportunity to advocate for the City of Whittlesea to further consider the protection of significant non-native trees. We strongly support the statutory protection of trees in the both public and private realms and recognise that the Council already has some protection measures in place for non-native trees via the Heritage Overlay mechanism. Given the urban development pressures on the City of Whittlesea municipality, we encourage Council to further consider how significant non-native trees, particularly those on properties in urban and rural areas that don’t meet the criteria for the HO.

We note that the City of Moonee Valley have recently contracted an arborist to review the entire municipality to identify all trees (including non-native) of potential significance on public and private land. This strategy of systematic identification and assessment is one that we encourage the City of Whittlesea to consider for their non-native trees. Consultation should

also be undertaken with Traditional Owner groups and Aboriginal Victoria to identify trees with potential Aboriginal heritage significance. We also encourage community engagement as part of the process of identifying significant trees, through allowing members of the public to nominate trees.

Conclusion

In conclusion, we are strongly supportive of the strengthening of the River Red Gum Protection Policy in the City of Whittlesea, and welcome any further opportunities to provide support for the protection City of Whittlesea's significant trees.

Should you have any questions about the above or require any further information, please contact me on 9656 9823 or at jessica.hood@nattrust.com.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'J Hood', written in a cursive style.

Dr Jessica Hood
Community Advocate Environmental Heritage