Warringal Conservation Society

Feedback on the draft Banyule Urban Forest Strategy.

31st March 2023

Background

Warringal Conservation Society (WCS) is an environmental community group advocating for the retention and enhancement of green space in Banyule. The society was founded in 1970 by enthusiastic community members to wanted to preserve parts of Banyule Flats as a bushland reserve. Now over 50 years later, Banyule Flats Reserve has been transformed from cattle paddocks to an area of State Ecological and Conservation Significance (Practical Ecology 2017). WCS has a large and varied membership including experts in their fields on a wide range of flora and fauna.

WCS is pleased that Banyule City Council is developing and refining an Urban Forest strategy. We believe this to be a very important strategy which must protect, build and enhance one of Banyule's most valuable assets towards the end of the century. We thank you for this opportunity to comment on the 2022-2032 draft plan and offer the following observations and suggestions for consideration.

Strategy development and Implementation

Reference is made to the previous 2015 Urban Forest Plan as a 'foundation' for this new strategy. In eight years since the previous Urban Forest strategy was put into place, only 14 of the 94 actions proposed have been realised. The underlying reasons for the apparently modest success of the previous plan should be identified and used to inform the development of actions in the current draft plan. It would also be beneficial to break long term ongoing actions into smaller steps that can they be measured to ensure progress is being made.

Defining the Urban Forest

There is a brief definition in the Figures 1 and 28, but the draft Strategy holds no obvious explanation of what Banyule Council considers an urban forest to be. A clear description of the urban forest is essential to provide context for the plans and principles laid out in the draft plan. Consider the example provided in the Brimbank Urban Forest Strategy (page 11).

What is an Urban Forest? The Brimbank Urban Forest comprises all vegetation within Brimbank. This includes all trees, plants and grasses and the environment in which they are able to grow. All living systems are considered part of the Urban Forest, such as street trees,

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We work on the country of the Wurundjeri people. We acknowledge them as traditional owners and pay our respects to their Elders, past, present and future.

parks, grasslands, waterways, vegetation in schools and privately managed land, green vegetation, contributing to improved liveability.

WCS would also like to see a clearer vision our what or urban forest should look like in the future. We note the that the desired general attributes of the future urban forest are discussed on page 38 (resilient, thriving, valued, fit for place). These descriptors may not have the same meaning to everyone and more complete description of the forest that we are aiming to achieve would be beneficial. It is indicated that indicators of achievement are outlined in section 9, but there is no section 9 in the draft plan. Should this read section 8?

Oversight of the Urban Forest strategy

Implementing and urban forest strategy is a great responsibility and a long-term project. We do not consider it prudent to have such a far-reaching strategy in the hands of one or two staff who may leave the Council's employ. WCS prefers the long-term commitment and consistency provided by a lead group or committee composed of informed members with appropriate experience/expertise. This committee should have the expertise to adjust the strategy to accommodate climate change.

Measuring Urban Forest diversity

A pie chart of current street tree diversity is shown twice on page 33. Five native tree species occupy 21% of the pie chart with the remaining 79% classified as "Other". Since no single species contributes more than 7%, overall diversity is deemed "good". This analysis does not consider the indigenous, native or exotic status trees in the "other" category; something that is essential for assessing the quality of diversity. Public feedback provided to date has expressed a strong preference for indigenous species which will be superior contributors to habitat and wildlife corridors. Thus, we suggest that measures of the quality of urban forest diversity should consider species present on a spectrum spanning high habitat value indigenous species to low habitat value weedy exotic species.

Species selection and ecological value

The Banyule Council demonstrated great vision by establishing a dedicated Bushland Management Unit several decades ago. Over the last 2-3 years there have been examples of the planting of arguably inappropriate exotic tree species (e.g. ad hoc planting of oaks in Heidelberg Park). WCS is not against the strategic retention and replacement of some exotics in our urban forest, however we feel that it would be counterproductive not to maximise the habitat value of our urban forest by prioritising indigenous and appropriate native species.

Banyule flanks the Yarra River and Darebin Creek and also encompasses the important Plenty river, all of which are vital wildlife corridors. It is vital that our urban forest enhances habitat for wildlife. The urban forest strategy should protect and strengthen existing biolinks/habitat corridors across the Banyule and wider regions, identify the gaps in these corridors and opportunities to connect fragmented biolinks or habitat corridors. WCS asks that species selection be scientific, based on environmental requirements, ecology, of Australian character (in the main) and include better defined information on how the

projected effects of climate change will affect species selection. We believe that the prioritisation of indigenous species and the conservation of local biodiversity needs to be enshrined in the final urban forest principles. WCS is concerned that neither the identification of the different plant community 'precincts' throughout Banyule or the inclusion of plant species lists are included in this strategy. It is also important that the selection criteria for the suppliers of trees and plants is open and transparent.

More detail on how and where 'Australian character' will be achieved is necessary (page 51). The draft Strategy lists Japanese, Chinese and North American trees to be planted without explaining why these species were selected or discussing the possible ecological deficiencies of exotics. Existing plantings of exotics such as Elms, Plane trees and Oaks may have a place in the strategy, but there are also areas where the neighbourhood character is defined by environmental weeds such as Sweet Pittosporum, Cotoneaster, Desert Ash, English Ivy and many others. Both the Banyule Invasive Weeds Strategy 2022 and the upcoming Biodiversity Plan should provide guidance of the replacement of weeds with indigenous and appropriate native vegetation.

There must be acknowledgment, for the purpose of not repeating the same mistakes, of inappropriate current and historic plantings; for example, the excessive planting of trees with little canopy (offering no benefit in heat island issues) or ecological value, such as Jacarandas, ornamental pears and other exotics, and the inappropriate planting of exotic trees in areas of native vegetation. Continuing to plant deciduous weed species such as Oaks and London Plane trees exacerbates stormwater, stream and river pollution with excessive seasonal leaf-falls. Healthy living streams require natural sources of vegetation material, entering the system in synchrony with the long-established seasonal life-cycles of all the stream macroinvertebrates and their dependent consumers like Platypus, Rakali, fish, etc.

Protecting existing trees

Also of concern is the excessive removal of trees and plantings within Banyule at institutionally controlled sites; for example, schools such as Heidelberg Primary School and church properties. There has also been heavy-handed pruning of native trees by the Banyule Council at Banyule Flats and Victoria Cross Estate that has removed wildlife habitat.

We ask what process/actions the Council will put in place to address the apparent ease of tree removal by developers and the weak regulations for illegal removal and careless damage. Canopy loss is greatest in new developments and the most difficult to address.

WCS believes there is a role for Council to urge the State Government

- to change Planning laws:
- to better support the planting and retention of Tree Canopy
- to better protection and stronger enforcement rules
- for better technical rules to protect existing vegetation during development
- to improve Transport Infrastructure Rules that regulate removal of canopy of residential streets and highways

The council and community culture of tree removal as the default action must be changed to one of removal as a last resort, including in new developments. In response to tree

removal applications, we encourage Council to promote more conservative remedies such as selective subsidisation of gutter guards, safety cabling of heavy branches, etc.

Climate Change

The Fourth Principle (page 39) lists Climate adaptation as one of three important elements of the strategy. Clearly defined targets for dealing with the deficiency should be included in the Urban Forest Strategy. For example, if Bundoora has only 13% canopy cover now, what are the plans to take it to 15%, 20%, 27%? What is time frame, and which areas planted?

Pests and Diseases

Warmer temperatures will change the geographical extent of pests and diseases, by affecting life cycles, habitat suitability and reproduction rates. The urban forest will face new risks and challenges as pest and disease ranges change. Extreme heat combined with low soil moisture can lead to declines in tree and ecosystem health.

In the strategy, lerps and Myrtle Rust are mentioned as two of the main threats to the Banyule Urban Forest without any explanation of the scale of those two problems or where they fit into the general spectrum of local plant diseases. Myrtle Rust is established in Victoria (Agriculture Victoria) and may significantly change our landscape. WCS would appreciate knowing where it is in Banyule, how fast it is spreading and what is being done to contain or manage it.

We are puzzled by the reference to the Bell Miner and its interaction with lerps, a tree sap-eating insect. Lerps may be 'farmed' by the Bell Minor, but they are also a highly valued resource in the Australian environment, eaten by flying foxes, possums, gliders and a wide variety of birds such as pardalotes, honeyeaters, silvereyes and thornbills. Some birds such as pardalotes, weebills and small honeyeaters virtually live off lerps in some seasons (Land for Wildlife). In Banyule there is habitat favoured by the endangered Swift Parrot; between May and July 2015 a flock of about 40 Swift Parrots were observed in the trees surrounding Macleod Station (eBird). Their food source was lerps in Yellow Gum trees. WCS appreciates that Bell Miner associated dieback is occurring in northeastern NSW but does not believe it is a major concern in Victoria nor a reason not to plant native trees. More a reason to encourage monitoring of Bell Miner occurrence.

Key targets and indicators

This strategy proposes a minimum average cover of 27% by 2050 for all Banyule suburbs, and no net loss in suburbs already exceeding that level. Research by the School of Ecosystem and Forest Sciences (Burnley) shows that a forest is defined as tree canopy cover equal to or greater than 30%. To maximise the environmental benefits of canopy cover, that canopy cover must be 30% or more. So why not aim for 30% to start with?

Tree canopy is being lost in parts of Banyule, mainly on private land. There is only one line in the strategy (S6.5) about revising protection for trees on private land, with no indication of what this 'revision' might be. As with many suburbs, developers demolishing existing homes and removing ALL vegetation is a serious attack on the tree canopy. WCS believes that the Draft Strategy needs a strong statement about penalties for removing trees in overlay

zones. There are many real and anecdotal instances of the Banyule Planning department operating inconsistently within or despite Banyule and State laws.

References

Practical Ecology (2017). Warringal Parklands and Banyule Flats Ecological and Conservation Values Assessment. Report prepared for the Banyule City Council.

Land for Wildlife website. Lerps – One of nature's sweet offerings. https://www.lfwseq.org.au/lerps-one-of-natures-sweet-offerings/

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