

December 18 , 2015

Plan Melbourne Refresh Task Force

By email planmelbourne@delwp.vic.gov

**Plan Melbourne Refresh
Submission On Urban Forest**

Dear Sir/Madam,

Canterbury Community Action Group (CCAG) makes the following submission on the importance of Urban Forest to Plan Melbourne Refresh.

Canterbury is defined by its Urban Forest comprising leafy gardens and parklands, and avenues lined with trees. This Urban Forest is valued by the local community. The trees provide amenity, health and biodiversity benefits, particularly as the urban landscape becomes more densely developed. We highly value our trees and are strongly committed to their ongoing protection and preservation.

Plan Melbourne Refresh correctly identifies Climate Change is a major issue in planning of Melbourne, and that “greening” Melbourne is an important strategy in responding to climate change challenges and building resilience.

The USEPA has this to say about Urban Heat Islands (UHIs):

“The term “heat island” describes built up areas that are hotter than nearby rural areas. The annual mean air temperature of a city with 1 million people or more can be 1–3°C warmer than its surroundings. In the evening, the difference can be as high as 12°C. Heat islands can affect communities by increasing summertime peak energy demand, air conditioning costs, air pollution and greenhouse gas emissions, heat-related illness and mortality, and water quality.

...

On a hot, sunny summer day, the sun can heat dry, exposed urban surfaces, such as roofs and pavement, to temperatures 27–50°C hotter than the air,² while shaded or moist surfaces—often in more rural surroundings—remain close to air temperatures.’ (1)

What can be done to prevent this? It is very important to increase the area available for landscaping and plant more trees and shrubs. Create and grow our “Urban Forest” because:

- Trees and other plants help cool the environment, making vegetation a simple and effective way to reduce UHIs. (3)
- Trees and vegetation lower surface and air temperatures by providing shade and by evaporating water through their leaves. Shaded surfaces, for example, may be 11–25°C cooler than the peak temperatures of unshaded materials. (3)
- ...,High canopy trees in combination with low shrubs and groundcovers are a great combination...as prevailing breezes will filter through the vegetation and be cooled prior to reaching the (building). (4)

However the reality is that many, sometimes it appears, all, forces conspire to reduce our Urban Forest.

Existing trees and gardens in private properties are removed by owners, and replaced by impermeable surfaces. Our Council attempts to control the clearing of vegetation (through tree permits and the like), but owners conspire to circumvent the rules, knowing that penalties are trivial, and prosecution is rare.

Our NRZ areas are an essential contributor to our Urban Forest. Plan Melbourne encourages increased housing density by requiring that NRZ properties can be subdivided into two lots, subject to rules described in Rescode. These rules define building envelopes and minimum permeable areas that leave little area for meaningful gardens.

The same Rescode rules apply for a single dwelling on a NRZ lot, leading to construction of mega-houses on NRZ lots, without meaningful garden or permeable areas.

We recommend that Rescode be adjusted to:

- Increase the minimum area suitable for gardens in all zones.
- Provide for smaller building envelopes and greater permeable areas for development of a single dwelling on an NRZ lot, than that allowed for two dwellings.

Street trees are under attack from the power companies, Council and traffic.

Since the introduction of the Electricity Safety (Electric Line Clearance) Regulations in 2010, we have observed extreme pruning and removal of well established, high value street trees, apparently to meet the minimum clearance distances specified to meet electrical safety and power supply objectives.

We see many large trees where the entire centre has been cut out to provide clearance from power lines, forcing all the new growth to few remaining external limbs. Often the balance of weight is not proportioned and limbs give way at the trunk putting risk to the general public and long term stability of the tree.

Also, major limbs of street trees that have been pruned to an un-natural shape to avoid power lines, are dismembered by large high vehicles that traverse our roads.

The recently completed review of the Regulations has reduced the severity of pruning in some circumstances.

The regulator Energy Safe Victoria uses a murky, one sided risk assessment to justify its extreme position on safety, not considering the importance of "greening" in planning for Climate Change.

We note that there is little risk in Canterbury of a bushfire being sparked by trees impacting power lines. Our observation is that the impacts of power poles and wires in our neighbourhood are:

- Cause the Council to prune and disfigure the trees, impeding traffic flow, at high cost to the community
- Vehicle collision with a pole increasing the risk of injury or death to the vehicle occupants, as well as bringing down power lines.
- Power lines providing a highway for possums, where inadvertent contact between lines causes death of the possum, as well as interrupting power supply.
- Providing an ideal site for graffiti.

In the 1880's, Canterbury was farmland that was developed in a series of residential subdivisions. Being farmland, there were relatively few trees, and almost none along the newly constructed roads. Power poles and wires were not impeded by street trees. Now, the urban forest has established to the point where poles, wires and trees compete for the same space.

We need to achieve an outcome that will protect both street tree and electrical assets for the community, moving away from the idea of keeping trees away from power lines, to working out how to protect and enhance our tree-lined streets while also achieving a safe and secure supply of electricity.

We recommend that Energy Safe Victoria be required to include the benefit of trees in its risk assessment in a meaningful manner.

Further, we recommend that all parties adopt a long term strategy to remove power poles and wires from our streets wherever technically and commercially viable. To this end, we suggest the parties:

- Develop a transparent and equitable charging formula to share costs between government, power utilities and householders for relocating power underground.
- All parties create and take opportunities to relocate power underground.
- Advocate and promote for relocation of power infrastructure underground, including conduct of pilot trial programs.
- Much of the power infrastructure in our suburban streets is old, and will incur increasing maintenance costs. When a pole is to be replaced, that government, power utilities and householders consult to capitalize on that opportunity to relocate power underground.

The Council regularly removes street trees, in response to complaints by private land owners. Perhaps the land owner doesn't like the "mess" of autumn leaves, or is allergic to pollen in the air, but a claim to Council that a tree is unsafe, or is causing damage to a building, is well known to cause Council to remove the tree, to appease its insurers. Again a one-sided risk assessment, undervalues the importance of Urban Forest in planning for Climate Change.

We recommend that Councils be required to:

- Consider the Climate Change benefits to the community of street trees in managing complaints about street trees
- Negotiate insurance policies that acknowledge that there is an implicit risk in having large trees in an urban environment, but that risk is outweighed by the rewards to the community in having those trees.
- Develop policy and procedure that reflect this balance of risk and reward.

We support any measures that will improve Urban Forest in Canterbury.

We welcome the opportunity to present further on this matter

Please do not hesitate to contact me if you have any queries.

1. <http://www.epa.gov/heatisland/> 30/11/14
2. Berdahl P. and S. Bretz. 1997. Preliminary survey of the solar reflectance of cool roofing materials. *Energy and Buildings* 25:149-158 30/11/14
3. <http://www.epa.gov/heatisland/mitigation/trees.htm> 30/11/14
4. <http://www.townsville.qld.gov.au/resident/planning/sustainable/Documents/Sustainable%20Housing%20Guide%204.pdf> 30/11/14