



The Palm Beach & Whale Beach Association Inc.

www.pbwba.org.au | PO Box 2 Palm Beach NSW 2108

NBC DRAFT TREE CANOPY PLAN SUBMISSION - JULY 2023

The aim of this Draft Tree Canopy Plan is to maintain and improve the tree canopy and prioritise actions in areas of high urban heat, socio-economic disadvantage, low canopy and in biodiversity corridors. We would argue that, at minimum, maintaining and better yet significantly increasing tree canopy should be the focus in **ALL** areas of the LGA.

We are surprised and concerned to note that the tree canopy cover for Palm Beach is only 42% and Whale Beach is a meagre 36%. In an area of such significant natural beauty this is completely unacceptable.

Council's actions in the Draft Plan are primarily focused on Council managed land, and where possible at strengthening tree canopy retention and improvement on private land.

- We believe that stemming the loss of tree canopy on private land is extremely important because Council's ongoing work to increase tree canopy on public land is not offsetting the losses occurring on private property.
- There is a need to protect not just the significant trees on the Northern Beaches, but also trees that provide habitat, food, shade and cooling, and aesthetic value for both public and private lands for the benefit of our ongoing mental and physical health and that of the ecosystems on which we depend.
- To achieve this, collaboration and cooperation is essential between **all** levels of government and the Community.
- There is a perception in the Community that Council's tree removal/replacement/pruning/landscaping controls are weak and inadequate and not enforced.

- We stress the importance of maintaining and enhancing the tree canopy on the ridge lines and slopes so that they are dominated by vegetation & trees. Buildings must be framed or partially hidden by green tree canopies from a visual perspective (when viewed from land and/or water).
- We are deeply concerned at the massive excavations permitted on some sites which impact vegetation not only on the site itself but trees and vegetation on neighbouring properties, root systems and natural drainage flow which can in turn cause erosion and possible landslip.

We believe the only way to save/enhance the tree canopy is for strong LEP/DCP controls to be set and enforced with follow up compliance and that EVERY canopy tree be valued.

Some suggestions to achieve this (in no particular order) -

- Proposed tree removal should be listed on the Council website as DAs are and a sign displayed in clear public view at the front of the property for a minimum 2 week period and clearly labelled on the tree itself explaining the what/where/why of the proposed removal. The process should be as transparent as possible.
- Given the detail supplied in arborists reports for DAs we believe mapping/registering significant trees suburb by suburb should be a relatively simple process.
- A Heritage/Significant Tree list, easily found on Council's website, should be created and regularly added to, updated and mapped.
- Tree removal/pruning approval documents must be available to be viewed when the contractor is on site. No tree removal should occur on weekends.
- One of the biggest loopholes lies in the DAs for alterations and additions where non-compliant landscaping already exists and is then generally not increased. When one wall remains and the dwelling grows from that we cannot understand why the 60/40 rule does not apply. Perhaps when demolition of say more than 50% of an existing dwelling is proposed the DA should be classified as a new build and the 60/40 rule applied. Deep soil planting must be increased and canopy trees required to be planted where possible even if none were there before.
- Council should have a list of authorised level 5 (and above) Arborists and qualified Tree removal specialists to keep out the "cowboys" (for example Sydney Water and Ausgrid have a list of authorised contractors who must be used).
- Compliance and longer term follow up is essential.
- Fines for illegal tree removal need to be increased drastically as a deterrent. The fine for 14 trees illegally removed at Narrabeen recently should have been \$10 000 per tree - not in total. For a multi million dollar build a \$10 000 fine is a drop in the bucket.

- If a canopy tree is to be removed/replaced or new trees required to be planted it must be an advanced tree not just a sapling/tubestock.
- While we understand that trees have a life span, there may be safety issues or disease and that removal may be required in some circumstances (including for a new build) the priority must **always** be the preservation of significant trees but failing that, replacement (minimum 2 for 1) by a similar species, endemic to the area and of substantial size.
- The NSW Rural Fire Service 50/10 rule needs to be reviewed in urban areas. This is a loophole for the "legal" removal of canopy trees.
- Council instigate a "Tree Lopper Stopper" hotline similar to "Crimestoppers" for tipoffs or reporting (can be anonymous) of questionable tree removal or pruning.

We support Council's commitment to maintaining tree canopy on public land and the actions already undertaken particularly

- the community nursery program
- the Bushcare program
- the ongoing annual tree planting program
- tree giveaways at special events
- planting 36,396 trees since 2018 – 2022
- identifying planting opportunities on public land
- obtaining grant funding of \$1.9 million for tree planting project

However we urge Council to ensure that significantly more be done to reverse the alarming trend of rapidly declining tree canopy cover on 'other land' (ie private land) throughout the entire LGA.

Prof Richard West AM

President
6 July 2023