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Attention: Craig Covich, Director Environment and Planning
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DRAFT URBAN FOREST MANAGEMENT POLICY

Thank you for alerting us to the exhibition of this policy.

The Mosman Parks & Bushland Association is committed to the preservation of parks, bushland, open space and the natural environment of Mosman including its urban forest.

We have studied the draft new policy and compared it with the seven existing policies that it seeks to rationalise into a single policy. The new draft Management Policy continues and refines the **management practices** developed through the seven existing policies adopted and amended between 1992 and 2012. Amalgamating the seven policies into a single document provides clarity, easier access and better transparency.

HOWEVER, WE HAVE A MAJOR CONCERN:

The new draft Management Policy is a document that deals almost entirely with **"Management"** and hardly mentions **"Policy"**. While a clear setting out of process is absolutely necessary, it is not sufficient. The Urban Forest Management Policy needs to have process and policy components.

The three key policies identified in the Urban Forest Policy 2004 policy (reviewed 2010) should not be discarded but explicitly stated in the 2017 document. It is important to include these because they succinctly express the fundamental principles and values of the entire management plan that follows. The Management 'Policy' sits in a vacuum without these.

Mosman's Urban Forest is one of its greatest assets as acknowledged in the Urban Forest Policy 2004. Mosman's natural landscape is what differentiates Mosman from other suburbs and makes it such a desirable place to live in and visit. An Urban Forest Management Policy **must** contain objectives for maintaining the forest and should state them upfront and clearly. It should also include a comprehensive definition of the urban forest.

Definition and Objectives needed in "Purpose"

The section headed "Purpose" at the beginning of the new draft policy should include the definition and state the objectives of the Policy.

As it stands it has the wrong emphasis. It places the need for balance *ahead* of the value of the Urban Forest. The values of the forest should be foremost. There is nothing wrong with achieving a balance, but placing it ahead of the objective to preserve the forest seems like an apology.

Readers of the policy, be they new residents, old residents, council staff and elected council representatives should be in no doubt that maintenance of the forest is the policy's primary objective.

The Mosman Parks & Bushland Association considers that the statement of Policy in the 2004 (reviewed in 2010) policy and reiterated in the Policy on Pruning Trees on Public Land should be included at the beginning of the draft Urban Forest Management Policy.

Perhaps it was the intention to expound these objectives of policy in another document, but we think it is absolutely necessary to state them at the beginning of *this* document so that readers wishing to inform themselves of management process can be in no doubt about council's intentions.

Additional comments:

Definition of the Urban Forest should include measurement of the canopy

There is a definition of the Urban Forest at the beginning of the 2004 (reviewed 2010) Policy that includes the fact that the canopy cover is measurable as a percentage cover of the total area. It is important to maintain this part of the definition and to continue to monitor the canopy cover. Without the measurement the canopy is likely to be diminished over time - little by little, imperceptibly at first.

Tree Preservation Orders

The words "Tree Preservation Order" as mentioned in "Trees on Private Property" in the 2004 Policy appear to have been omitted.

Why? They are generally understood and they express preservation.

We suggest that something about Mosman's Tree Preservation Orders could be added at the beginning of the "Tree Permit Application Process" in the new policy.

Pruning of Trees on Public Land by Residents

The consideration of discouraging residents from taking matters into their own hands is understood particularly in light of recent problems.

The specific details of pruning that council will consider are clearly expressed. In the Policy of Pruning Trees on Public Land 2006, explanations of these specifics are given. We suggest that these explanations are helpful and should be included in the new policy. In addition, the first paragraph of the Pruning trees on Public Land Policy (P 2 of the 2006 document) would be a useful insertion to remind applicants of the value that the community places on its urban forest.

Trees - Replacement 1992 policy

"That permission for the removal of trees be granted on the basis that a suitable replacement tree is planted somewhere on the property" is replaced in the new policy by "As a condition of approval for removal Council **often** will require the planting of a suitable replacement". It is not always appropriate for the tree to be replaced, but we suggest substituting **usually** for **often**.

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It would be better if the Application Processes **followed** policy statements and the assessment and application guidelines, so that residents gain a clearer understanding of what applications are permissible before reading about making the application.

Compliance

We note this regrettable but necessary addition to the management tools.

Tree Planting on Council Land

Tree planting strategies and programs to ensure the maintenance of Mosman's tree canopy and urban forest are welcomed.

We note that a register of memorial trees has been dropped from that policy. We agree that Council cannot be responsible for the success of the plantings and needs to reserve the right to remove or relocate the trees. A register, however, would minimise disappointments.

Education

This does not appear in the new policy. However, it would be helpful for new residents particularly, to receive material about the Urban Forest and Council's ambition to maintain it along with other information about control of weeds and encouraging native planting etc.

CONCLUSION:

The draft Urban Forest Management Policy is an excellent document when it comes to management processes, but the lack of actual policy in the document lets us down. Council has done wonderful work in maintaining the urban forest and developing ways of compensating for losses through the ill conceived 10/50 policy. Now, more than ever, however, as population density increases, and especially if Mosman is amalgamated with other councils, the promotion of our ideals and values in a rigorous statement of policy objectives is essential.



Kate Eccles, President

19th July, 2017