

18 September 2025

Community Consultation Report Urban Forest Policy



Randwick City Council
a sense of community

Consultation overview

- Randwick Council's Draft Urban Forest Policy sets a clear direction for how we will manage and protect trees across public and private land in Randwick City.
- The draft policy was on public exhibition 16 July to 20 August 2025.



1450

Website visits



881

Policy downloads



70

Submissions



Consultation overview

How we communicated

- Your Say Randwick website
- Presentation to Clovelly and East Kingsford Precincts
- Pop-up at National Tree Day *Plant with Us* event
- Email campaigns: Key stakeholders, Your Say subscribers, Resilience Advisory Committee and Randwick City Precincts.
- Weekly eNews: Featured in Randwick News during the consultation period
- Social media: Facebook and Instagram posts
- Digital Displays: Information at libraries, the Des Renford Leisure Centre, and Customer Service Centre
- Randwick Council Website: Listed on Current Consultations webpage
- Councillor Notification: Local councillors were informed

What we heard

Key themes from submissions

Key theme	Verbatim comment
Overall support for more trees	<i>"I am very supportive of any policies to increase urban forest percentage."</i> <i>"I love that our Council has adopted this policy. Thank you!"</i>
Tree species, biodiversity and suitability - Planting the right tree species in the right locations, more variety of plantings especially native species.	<i>"Please can you not use our rates money to plant trees directly under powerlines."</i> <i>"Vary the species of trees. I've seen some great Council plantings but they often are all the same species. In addition to being less interesting and biodiverse, this mono-species approach can lead to mass die off."</i> <i>"Planting decisions should take into account what plant species provide food sources to native wildlife...with an emphasis on planting native species as much as possible."</i>
Tree maintenance and management - Concerns about Council's maintenance of trees – including watering and pruning.	<i>"The recent project to plant street trees has not been successful. Trees have not been maintained and consequently died - what a waste."</i> <i>"The council puts more time and effort into mowing and spreading pesticides than caring for the trees."</i>
Opposed to reducing the tree canopy target from 40% to 22%	<i>"I would like to see the tree canopy percentage increased from the proposed 22% to a minimum of 30% (given the stated limitations on achieving the desired 40%)."</i> <i>"The council should stay with the goal of 40% canopy and focus on educating the community on why it is important..."</i>

What we heard

Key themes from submissions

Key theme	Verbatim comment
Developments and protection of existing trees – Concerns about developers / residents removing mature trees, and calls for stronger oversight.	<i>"We have had 4 new builds around us in the last few years and each build has demolished at least 3 to 4 trees in gardens... They should be legally required to replace the trees."</i> <i>"..damage deposits need to be significantly higher so that builders and developers take notice of them."</i> <i>"Plantings which have been required as part of a planning approval must be enforced for years."</i>
Education and community involvement	<i>"...is there the possibility of greater education of home owners to encourage tree planting in a concerted campaign."</i> <i>"much more is needed to be done to encourage owners to have more than 1 metre of lawn plus one tree."</i>

Appendix A – All submissions

Do you have any comments on the draft policy?	
1	Support more trees.
2	The policy seems well intentioned. Please make provision to remove trees that grow too tall under power lines & resolve not to plant them in the future, especially Hawaiian Hibiscus.
3	My feedback is negative - why revise the target of 40% so significantly? The recommendations are 30% at the very list. In the time of climate change and the impact in Au cities, 22% is, well, ridiculous. As an example, there is a bus stop near the building I live - it is very exposed, no shelter. There used to be a big tree in front of the apartment building providing shade and protecting the shelter but it had been cut down and not replaced. This seems to be similar story all around. Also: - financial constraints, with high costs associated with planting and maintaining trees - really? Australia is such a rich country. Poorer countries have much better tree canopies. If Australia cannot afford this then we are doomed I suppose. - community perceptions that can limit support for urban greening efforts - not quite sure what that means - I am positive everyone would appreciate more tree canopy, not less.
4	Be great to understand how council will use climate change forecasts in the selection of species for new plantings. Also, be good to know how council will work with other councils and the state government on managing pest threats (eg the introduced beetle in Perth that is wiping out fig trees). Also, be worth noting in the plan examples of the fauna species that depend on Randwick's urban forest. Also, would like to know Council's plan for middle story plants, beneath the big trees which often support small birds and other animals.
5	I am very supportive of any policies to increase urban forest percentage.
6	The policy focuses on increasing tree canopy to 22% by 2040 and places strict controls around pruning and removal, even on private property. While it promotes biodiversity and urban cooling, it gives limited consideration to safety concerns from overgrown or hazardous trees near homes. There's little support for residents dealing with neighbour tree disputes or trying to proactively manage risk, which may leave people and homes vulnerable.
7	No. Extensive enough. Ready for adjustment if necessary
8	Although the council doesn't have direct control over private property, the laws could be changed regarding development such that there is a minimum area on residential blocks that has to be green. Current trends mean that the entire block of land is now almost entirely taken up by huge houses with no green space.
9	Strongly support preservation and planting of trees, and increasing canopy.
10	I disagree with the policy provision "5.1.4. Lighting and Other Attachments" where something so minor as fairy lights will require an assessment by the Council Urban Forest Planner. The wording is too broad, is an overkill and administrative over complication of something that is minor in nature. It will also

	difficult and unpopular to police and enforce - hanging a few fairy lights at Xmas time on a tree outside the house is highly unlikely to harm it and should not require council resources to review and approve. Maybe only certain types of light attachment that are most likely to cause harm that should require a permission, all others should be allowed by default
11	The policy is general, and of itself it's fine. However the overall approach toward greening Randwick council areas needs an overhaul. The canopy cover is far too low. Part of the reason for this is the council's ongoing commitment to laying concrete wherever possible, and prioritising overhead wires and garbage trucks. The area looks appalling, particularly when suburbs like Mascot have sought opportunities to plant and green the environment, it's a shame. We need to look at creating planting opportunities in the centre of wider streets. We need to stop planting trees that always look half dead (bottlebrushes are a serial offender here), and select better options - they contribute very little to actual canopy and are a visual blight. In fact bottlebrushes are also a huge issue for people with allergies - not great for community health. Of course it will cost more if the council were to introduce road centre plantings, more landscaping on verges, need to prune around wires rather than just lopping underneath. But this could be well covered by introducing paid parking at all out beach areas for non-residents (like every other council does). And garbage trucks just have to try harder...to is all seems achieving in other councils. Randwick should be the most magnificent area with all the natural beauty, but it's looks like a rundown mess.
12	I love that our Council has adopted this policy. Thank you! My feedback is the following: 1. Increase the percentage 2. Plant trees in front of homes/apartment blocks that don't have any (I'm on a cul-de-sac at the end of Maroubra's Hughes Ave where several neighbors in a row have no trees in front of their homes and it's a very over-heated spot in the summer). 3. Plant trees that grow fruit so the community can eat from and increase our connection with these trees and increase our sense of care -- and plant trees and plants that flower so we can enjoy the beauty and pollinators can thrive. 4. Vary the species of trees. I've seen some great Council plantings but they often are all the same species. In addition to being less interesting and biodiverse, this mono-species approach can lead to mass die off. Thanks again for all your care and work around making Randwick as beautiful and sustainable place to live!
13	Looks good and meets most situations. We need trees but we also need the right trees.
14	Some private property has inappropriate trees on the street
15	Pruning or tree trimming on private land should be decided by the landowner or house owner. To prevent spread of bats or bird dropping.
16	Yes. I'd like to see some more specific and concrete guidelines (and reinforcements) on neighbour property tree access. Too many times have I seen neighbours walk in and prune others' trees and my own without consent. I have also seen a lot of recent developments remove large mature trees that offered sound protection, native wildlife protection and habitat, being removed and offer lip service to replace them, and never replace tree cover. Only replanting with shrubs or bamboo. We have lost a LOT of biodiversity over the last 10 years. Instead of native birds the neighbourhood is now full of Indian Miners.
17	I am disappointed to see how the policy limits the autonomy of home owners to make decisions about trees on their own land. Real estate is at a premium in the eastern suburbs and people should be allowed to remove trees or trim them without involving the council. Trees on private land should be exempt or at least the council should not block applications from residents to remove or trim trees without due cause. "Canopy cover" when trees are close to houses

	might not be as important as safety in high winds or property values. I think the policy should apply to public land and the council should stop trying to control what citizens do with trees on their own property.
18	It is good to have this updated and comprehensive policy on this vital initiative.
19	I would love to see the revised target a little higher. Thank you for all your great work!
20	Reducing the target so low is seriously concerning for a council that otherwise seems to have a lot of resources! Really urge you to have ambition on this knowing it will benefit residents in shade, animals and amenity. We need you to get serious about planting and caring for trees in our area as well as ensuring that developers aren't just razing blocks for no good reason - that means proper enforcement and listening when community members raise this with council staff. It also means fighting for powers to actually retain these trees before our neighbourhoods are just razed.
21	in favour of increasing tree canopy but need to be mindful to have nuanced rather than scattergun approach to planting ie not planting where would views, parking etc would be lost.
22	Surely we can do better than increasing the canopy 6% by 2040! Stop authorizing the removal of established trees forming canopies already instead of planting new trees that will take years to grow!
23	I'm disappointed by the sharp reduction in the canopy target.
24	Vandalism: Erect a solid structure equivalent to or greater than the volume of the poisoned tree. Ensure that the view is ruined for a period of at least 15 years (concrete footings and steel lattice). Plaster it with requests for information on the vandal. The nearby community will soon provide the culprit's details. Failing that, the ugly structure will send a message to future vandals. Mesh hung between two poles is not good enough.
25	whilst the draft policy is welcome and a very good addition to Councils efforts to increase tree cover it is crucial that subsequent documents and work reinforce the aims of the document, in particular species selection planting methodology and follow up maintenance. The recent street tree planting in Maroubra at the ocean end of Maroubra Road and adjacent streets was an abject failure, with a near total failure rate. Species selection was very poor, tristaniopsis in salt laden southerly wind as an example, Magnolia on ridge top exposed Bellevue St. From casual observation some appeared root bound when planted, planting level was either too low or too high and subsequent watering insufficient and infrequent. So in summary, policy is needed but meaningless without adequate resourcing to follow through on the ground. The example I give above has had zero material impact on tree canopy and no doubt came at a significant cost. There appear in general to be many opportunities for a more targeted and strategic approach to canopy infill, where the species numbers spacings etc could be tailored to the particulars of the site and the local residents engaged. Too often street trees are removed by residents who park on the verge or simply don't like trees. A broad brush masterplanning approach is too coarse a tool. Tree planting should be a design exercise with careful attention to all the factors that impact tree vigour and all the requirements of the urban/suburban setting eg services, pedestrian movement , stormwater, vehicular movement, access, topography etc

26	I find it very disappointing that Council adjusted the tree canopy percentage from 40% to 22%. There are still many parks and streets where more trees can be planted and there are also not strict enough rules about trees for new houses. I also believe that by bringing electricity cables underground we would have lots more space for trees. So overall I believe that Council could try harder to achieve the 40% tree coverage.
27	I think it is a very good initiative and I believe trees are a very important aspect of our community health - for flora, fauna and people.
28	Three points to make. 1) 22% tree canopy as a target for Randwick City Council lacks ambition when placed against the previous target of 40%. This will have a negative impact on urban heat and native animal habitat in the face of a climate change. It also has psychological effects: (a) By low-balling the target, it normalises grey space and makes it easier for the State Govt to reduce canopy targets in their environmental planning rules. (b) It's harder to care about what you don't see and this has wider implications. 2) The Significant Tree Register should be broadened to include all trees with large canopies and trees important for local wildlife ecology. 3) Council should present a breakdown of existing tree canopy coverage according to public and private land, and by Ward. Going to the next level, this could be an online interactive presentation for residents. This would show where efforts to increase canopy have been successful and where they have failed.
29	It is not acceptable to reduce tree campy targets to 22%. Randwick LGA is wealthy and capable of meeting or exceeding the target of 40% urban tree canopy cover by 2036. The draft Policy cites community sentiment as a reason for the reduced target. This is a shame, as I think you will find most residents, when asked, would prefer cooler, greener places to live to help boost climate resilience. Wide streets should have central trees. Private developments should have consent conditions to install and establish mature trees. Larger developments VPAs should contribute to pocket parks and meaningful street tree canopies (eg all the student housing along Anzac Pde). All council projects should dramatically increase deep soil trees (eg: North maroubra SLC, and the works at McKein St pedestrian area, could have been much better than large pots.) I urge you to refer to this wonderful new guide: https://www.planning.nsw.gov.au/government-architect-nsw/policies-and-frameworks/biodiversity-in-place
30	Good to update the policy however based on PAST OBSERVATIONS will council be able to successfully implement an adequate watering plan after new young trees a planted ???? Although council has good intentions many new trees die due to lack of water and insufficient mulch around the base to prevent the soil from drying out. The water truck I have seen on occasions BLASTS water onto the base of the newly planted tree, rather than showering the water on the base of the tree. A blast of water only disperses the mulch under the tree leaving the root ball uncovered and more susceptible to drying out. I would suggest council monitors the watering process provided by these water truck companies as council may be paying money for a job that is poorly executed. I would suggest council also monitors how much mulch is present around newly planted trees after a few months. I have noted mulch is often removed/ disturbed, not only by the water jet blast created by the watering process but also by council grass mowers (on public land) who like to ram their lawn mowers right up to the trunk of the young tree and in the process disturb/ scatter away any mulch that was placed there earlier. The council lawn mowing team needs to be educated to not use whipper snippers on the trunk of trees, not to ram their mowers into the tree trunk or surrounding timber

garden stakes. Council should then replenish the mulch that has disappeared from the base of young trees.

In relation to tree selection, I am not in favour of a DOMINANCE of gum trees being planted on suburban streets. Gum leaves that drop into the street gutter do not decompose readily and facilitate weed growth in the gutter which makes the suburban gutters look untidy. These eucalypts should be predominately planted in parks and bushland. I have preference for street trees that have a balanced uniform appearance, offer colour for the landscape / streetscape and are tall enough to offer shade for pedestrians. I often wish our streets had more palm trees as is the case in the northern beaches where there are exotic palms growing on public land. Planting palms may provide a different landscape character by creating a lush, tropical effect which may in turn provide a sense of relaxation for the community. This would especially be suited to our more coastal suburbs (Chifely, Malabar, Maroubra, Little Bay) and Heffron Park pool area.

31 We support the Urban Forest Policy and support increased protection for existing trees as well as increased urban canopy targets.

32 This policy appears to operate in isolation to the bushland preservation addressed in the recent POM (in draft). As trees do not always survive or thrive in isolation, it would seem logical that the two policies should be better aligned - bushland and trees are both needed and need each other. Having different agendas and different parts of council responsible for bushland and trees will be problematic.

Council has to make a better commitment and explain how trees will be maintained. The recent project to plant street trees has not been successful. Trees have not been maintained and consequently died - what a waste. It was also clear that the street tree planting faced significant resident opposition. Many of street trees Council planted were quickly removed by residents. Community engagement and support needs more than a letter drop.

There is a lack of information about resourcing. Who/how will this policy be implemented? Existing open space staff do not have the resources, or possibly the skills, to undertake this work. What resourcing is available to maintain the nursery and provide the stock, given that there is often limit stock available there due to the lack of staff. What's the budget?

The process for community engagement and gaining better support for more trees is underestimated. There is significant opposition to tree planting by our neighbours. This really needs a better plan than 'information on the website'. 'notifying residents'. These measures - minimal as they are - will not be enough to overcome opposition to this policy. A much better approach to community engagement is needed to change opinions and gain trust and support. This is not only technical issue. It will only work with community awareness and support.

33 Yes. Not sure if you want them here but firstly it's great the policy is being reissued with a more realistic canopy cover goal.

4.1.2 and 5.1.3 Ausgrid pruning - I think its important to try to be stringent with them and ensure they maintain the Pruning standards with the work, in the same way others have to follow.

4.1.4 it would be great to see mentioned here that the Council is open to receiving recommendations to have trees declared as significant trees.

4.1.5 whatever they are, damage deposits need to be significantly higher so that builders and developers take notice of them. (Damage to a tree in the Botanic Gardens by a contractor can result in many thousands of dollars-significant trees in tens of thousands)

4.2.6 states the GM makes the final decision about tree removals except in 2 instances. However this policy should state who makes the decision if it involves those 2 instances. The Councillors?

4.2.13 I'm very nervous about trees taking up parking space and would prefer that be removed though I am happy to see them planted in median strips. The Randwick LGA is far less pleasant a place to live than it was 30 years ago in so far as parking is concerned. Everyone including the traffic managers are taking out parking which in many areas is difficult to find - and yes some of us need a small car for our caring responsibilities.

5.1.6 I would suggest you take out the name of the Tree Info System. Nobody really cares what it is called and you make when to change software in the next few years but it will be "named" in this policy. Suggest you just call it a TIS

5.1.4 I do not support lighting in trees and would prefer it be taken out. Trees are habitat for birds animals and bugs and lights on at night disturbs their environment. In addition this kind of electricity use is "frivolous" and one of the many measure humans need to avoid in their "placemaking" to start to contribute to reduced energy consumption and environmental sustainability. Suggest you promote this change as part of Randwick's sustainability measures. 6.1.3 seems weak. We all know that "engagement and encouragement" being used on people who don't care for trees or seem them as being in the way is not going to work. I'd like to see stronger actions taken on this.

As an extra point somewhere, I'd like to see mention of the need to leave some dead trees with hollows etc as being needed to be left in the urban canopy (if they are relatively safe) do that they can be used for habitat for animals, especially if we are trying to connect the disparate bits of urban canopy to enhance habitat. Thank you.

34

Whilst your proposed policy sounds lovely, it doesn't address some serious issues that will affect the community down the track.

As you would be aware, for any action taken there is always a counter reaction.

For a start, Council doesn't have a good reputation in planting appropriate trees in streets, planting large canopy trees under power lines, which at a later date energy companies have to come along and cut the heart out of the trees, with its shape then looking ugly, stupid and ridiculous.

Large canopy trees planted at the back of houses, whether in lanes or on streets, will eventually block all sunlight, making clotheslines basically useless, requiring clothes dryers to be used to dry clothing. Thereby defeating the purpose of using natural sunlight and instead leaving a carbon footprint in using unnecessary electricity.

Whether you plant these trees at the back of houses or on the nature strip in front of houses, these trees will eventually block all sunlight and inclement weather, which, like we have experienced in the last six months, will eventually prevent walls from drying properly, causing mould issues that will have a detrimental effect on the health of the house occupants and in some cases will prove fatal.

Some households in the Randwick municipality take pride in the nature strip outside their houses and have gone to great, expensive lengths in landscaping this area with top-quality grasses and irrigation. This area is always in lush green condition all year round, no matter what time of the year or climate conditions. Accordingly, they don't want any type of tree planted in this area.

If Council tries to plant anything in this nature strip area, they should compensate the household for the expense the household incurred in bringing it into this healthy condition. Council should also be required to regularly maintain this area by weeding and mowing every three to four weeks, like the household does. All Randwick large parks are already utilised by sporting fields; planting more canopy trees in these areas could cause issues with the playing fields and games played.

In respect to Pioneers Park, this total open area design concept, with no trees was achieved in consultation with the stakeholders at the northern end of Pioneers Park in conjunction with The Mayor at the time [edited by RCC].

Besides the top section being an off-lead dog area, it also serves as a warmup area for the AFL teams & Cricketers.

Both the mid-section & upper level of Pioneers Park also attracts & caters for kite flyers, model plane enthusiasts, parachutists, and all other types of sports when not in use by sporting teams.

What attracts so many people to Pioneers Park from other suburbs, especially the elderly with dogs and young mothers with babies, strollers & dogs in toe, to the off lead dog area, is that Pioneers Park is unique in that it is the only park that virtually has a footpath around the whole circumference and a pathway that divides the main pitches.

It's a meeting place for a lot of single elderly people with dogs, who have lost partners & enjoy getting out walking & exercising around safely on level ground,

whilst they can let their dogs off-lead to enjoy the area.

This open area of Pioneers Park, without any tree obstruction, gives people of all ages a sense of safety especially in the early mornings & evenings and that no danger is lurking close by.

The West Ward Councillors at the recent meet & greet day, acknowledged the benefits of the open plan concept and the agreement made years ago that no trees were to be planted at Pioneers Park.

I also meet, [edited by RCC], at the Maroubra Precinct Meeting on Monday night and he acknowledged from the submissions received, concerning the Pump Park that people loved and felt safe with the open plan concept of Pioneers Park and accepted that no trees should be planted on Pioneers Park.

Please bear all of the above in mind in considering your draft plan!

Other areas you should consider as the Draft plan also includes the State Government are school sporting grounds, golf courses and Malabar Headlands which is a waste of space and not really a National Park and it's about time it be made available to the community.

35

Private Land

While recognising the importance of trees in our local area I have concerns about your draft policy and do not think the council should have the authority to remove or replace trees on private land without permission of the owner. I also think property owners should have the right to plant, prune or remove trees on their property without the need to notify others or get permission from the council. People living on the property have the best understanding of what suits their property - for example, the sun on the washing line, backyard area, solar panels as well as where they need shade.

Safety

Although trees can enhance the street space, consideration must be given to safety aspects including restricting the view of oncoming traffic on corners where a car has to pull out into the street, past the tree to see if anything is coming. An example is on the corner of Broome St and Byrne Crescent where 4 trees were recently planted outside a house and, as they grow larger and wider, will obstruct the view of traffic coming up the hill as you make a right hand turn from Byrne Crescent. Interestingly, the home owners did not know the trees were being planted outside their house.

The size of trees should also be considered in relation to branches growing across the paths of cars and where people walk along footpaths. Trees should not be so close that people are hidden as they walk along footpaths in the dark. Trees have been planted outside Long Bay Gaol underneath wire lines while there was an area further along Anzac Parade where there were no wires. The pruning of the trees will be an added cost for the future and should be a consideration in tree type choices.

The type of tree should also be a consideration as banksias drop many cones and can obstruct a walkway. An example is an elderly woman I saw dangerously trip over them along Marine Parade just past the Fitzgerald Ave intersection. She said she had fallen over the week before. While your policy includes maintenance (and I appreciate how hard it is) safety includes cutting back trees properly over walkways, for example between central Maroubra Beach and the South End. Some branches still extend into the walkway area or have been left to pull down the fence wire. Dead branches are left on the ground making the area seem not properly looked after.

Species selection planting

This importantly states the valuable role of each type of tree including their visual impact. The pleasure of deciduous trees giving shade in summer but allowing some sunshine and warmth in winter is important apart from the visual delight of seeing a tree come into bloom. I have already mentioned the importance of banksias not being planted next to footpaths. Another important consideration is that we live in a very special location beside the ocean with beautiful beaches people want to walk along, sit and enjoy the view, use the facilities like playgrounds, exercise areas and cafes as well as enjoy socialising

and celebrating. For all of this people want to be able to see the beach making consideration of views of the beach essential and not something to be completely obstructed by trees. We value the importance of trees but also our very special location in comparison to many other areas of Sydney.

36

Dear Technical Services,

My name is [edited by RCC], a property owner and resident in Coogee. I am an Urban Forester, currently working as Tree Management and Landscape Officer for a neighbouring Local Council.

I would like to make some respectful comments about the following sections of the proposed Draft urban Forest Policy:

"We will"

Paragraphs and sentences commence again and again by the words 'we will', in fact used in 44 occasions. In formal and legal documents, I think it's generally recommended to avoid using "I will, we will" and instead opt for more precise and unambiguous phrasing, especially when expressing obligations or future actions.

I recommend the use of '....will be done, Council considers....., it is considered, it is intended to', is best industry practice, as per, etc'.

4.1.5 Exempt and Complying Development

The third paragraph indicates "We will assess requests to remove street trees associated with exempt and complying development for Complying Development Certificates (CDCs) as part of civil works applications.

The assessment will consider the tree species, size, health, form, and the importance in the landscape."

Whilst I agree that this is the usual process for approved works within the boundaries of a private property that then require the construction of a - in most cases - a crossover/vehicular access, this statement can be interpreted as if Council was to facilitate works approved under a CDC by a private certifier or exempt development involving the removal of public trees.

I think the following statement may be included before the abovementioned paragraph:

Generally, Council will not consider the removal of trees located in public land to facilitate a private development, especially for works approved under CDC or Exempt works. Construction works impacting on public trees can be appropriately assessed under a Development Application.

4.2.1

I think as a list of practitioners, 'Urban Foresters, Arborists, etc' shall be included on the second paragraph, especially when talking about works near trees.

4.2.5

Please avoid We Will as it is not something that Randwick council does specifically in our LGA, these works are just best practice and common process across the industry.

I think the paragraph may be modified as 'Tree establishment maintenance involves practices that help newly planted or young trees thrive and reach their full potential as regular watering, fertilising, formative pruning, and mulching'.

4.2.7

....based on - best - industry standards.....

5.1.2

On the second paragraph has been written the sentence "due to he requirements of AS..." and this is incorrect.

There are 2 types of standards: mandatory and voluntary, being Australian Standard AS4373 – Pruning of Amenity Trees (2007) a voluntary standard. Generally voluntary standards represent best practice but they are not a legal requirement. It is legal to supply proposals that do not meet voluntary standards.

I would suggest "As recommended by the Australian Standard AS4373 – Pruning of Amenity Trees (2007)...."

I would also suggest replacing the words "good" for "best", i.e "complete pruning of branches away from the property is not best arboricultural/industry practice and cannot/will unlikely be supported".

37	I like the idea of protecting trees and growing the canopy, but something does not add up. At present it appears all the work of increasing the canopy relies on Randwick Council either through plantings in parks or on roadsides. Private land seems to be exempt. There are so many developments taking place in Randwick and most of them are blocks of units. It seems the planning laws allow the clear felling of sites and then allow the developers to put buildings right up to the boundaries. Good old back to the 70s. Some small trees go in but there is no room for large trees existing or to grow. It appears that they take up too much room and there is no consideration for what the area will look like in the long term. Even on public land those beautiful old figs around here are being taken out as they are damaging nearby houses. They are replaced with much smaller varieties. There will be such a loss of canopy and habitat for birds and animals in the future.
38	The policy addresses all of the important issues related to securing increased canopy cover for RCC, but it will depend on all the elements of the Framework being updated and further developed and the quantity and quality of staff available to support and oversee the policy.
39	I commend Randwick Council for this initiative and I am welcoming it, however I can't see any specific points in the policy regarding maintenance of leaves. I would like to see information about how leaf litter on streets and public land will be regularly cleaned, particularly in areas where it currently isn't maintained. This can pose a safety risk, especially during dry months when it poses a fire risk. I also suggest including provisions to avoid planting tree species with invasive root systems near private properties or infrastructure. These roots can cause significant damage to pipes, pavements, and building foundations, and it would be prudent for the policy to account for this in planning and species selection.
40	There doesn't seem to be any capacity or funding allocated to alter or upgrade infrastructure to optimise tree cover. For example - undergrounding powerlines to maximise tree canopy. There are a number of streets in Randwick with large trees that are regularly pruned heavily (in ways that disfigure the trees and prevent natural growth) to allow for power lines. For example, Botany Street.
41	I am very much in favour of the establishment of an Urban Forest Policy supported by Randwick Council's wider sustainability and bushcare policies and practices. The draft policy states on page 7 "Lower canopy coverage is seen in the suburbs in the south of the LGA such as Malabar, Little Bay, La Perouse and Port Botany." It is imperative that these areas are being prioritised and that the community is involved in the process as there is strong community interest and engagement.

42	Very disappointed that it's down to 22% coverage. Also much more is needed to be done to encourage owners to have more than 1 metre of lawn plus one tree. Also enough with banksias - what about other trees for smaller birds.
43	If Malabar is one suburb without enough trees and green space, why are you destroying Cromwell Park by putting a hard surface Pump Park there.
44	Why are Randwick Council going against their own policy by destroying Cromwell Park to create more hard surfaces in building a Pump Park and removing trees.
45	Randwick Council must prioritise the protection and management of new and established trees across the LGA, and that includes preserving and protecting existing parks and forests that are part of the urban canopy. RCC should not be prioritising buildings and sporting facilities in existing parks where trees and green space will be removed to make way for concrete bike pump parks and buildings. These are the spaces where you can be planting a large portion of trees, and maintaining the existing trees and bushes. As stated in this policy RCC should be preserving native habitats, including planting more trees in the areas which have low tree canopy. Despite the incredible effort RCC went to in planting thousands of trees across the LGA, it's disappointing to note that many of these trees are not being maintained. Many of the straps supporting the trees are broken and the trees are falling over, and the parks and maintenance services are mowing over some of the trees and whipper snipping around the bases and ring-barking them. During the hot weather, trees were also dying from lack of water. There seems to be a zero care factor from your parks and maintenance crews and your contractors. I noticed this in various parks, including Barwon Park, Pioneers Park and Yarra Bay Bicentennial Park, and trees planted curbside in many suburbs. There also needs to be much harsher penalties for people who are vandalising trees during new housing developments or on public land for their own gain!
46	It is admirable, fine words but I have grave doubt that council action on the ground will actually align with it. 1. A forest is a group of trees or (UF plan definition) bush which can grow over 3m in height. 2. Trees and bushes rarely thrive in isolation. A forest by common definition means a group of trees and bushes. In order to be effective and create and maintain enhanced canopy (for all the benefits understood and outlined) it is critical that linked and grouped planting be made and maintained. conveniently cutting pathways clearings or gaps for whatever purpose makes plantings vulnerable. the effect of this is easy to see across the RCC area where isolated plantings wither and die despite some after planting care. 4. RCC has been far to cavalier/negligent in instructing or by poorly instructing contractors to 'trim' (actually destroy) 'inconvenient' trees and bushes. I particularly witness the thin strip of ESBS along Malabar Bay Pde razed by contractors bringing Bushcare volunteers to tears - and denied by the Mayor when asked by the local Federal member. 5. In order for an Urban Forest plan to succeed RCC must take big picture responsibility. The council area has few areas of deep soil with established large trees where more can be planted/infilled or which are suitable for large trees. Isolated trees won't work. 6. Plantings which have been required as part of a planning approval must be enforced for years. I have been told by RCC officers that no enforcement is possible and this means the proponent plants, gets the approval sign off then - oh look, shame, the mandated planting has died so whilst the best intention for planting was made it does not work without follow up and enforcement.

	7. Without this you are dreaming and quite frankly wasting your time and our money with empty words. I am sorry if this comes across a little blunt. I regularly talk with council officials and workers on the ground. Action must be more co-ordinated. Please, its a great idea but....
47	I fully support the urban forest concept and it should be applied across Randwick - especially Malabar - where we need an increase of tree planting and collective tree management in parks in Malabar to increase coverage and promote a wildlife corridor between national parks and urban parks. This is especially true of Malabar beach where cutting down of 13 fully grown trees (including Banksia Serrata) next to the beach in front of the life saving tower over 2 years ago (which was unnecessary as did not block vision) has not been remediated adequately and has led to heavy seas washing away all ground coverage, plantings and degrading dunes. There are no shade trees anymore adjacent to the beach. There needs to be a considered balance between existing and proposed sporting facilities in Randwick which remove trees to build hard concrete structures eg. Heffron Park and Pioneer park which already have sufficient sporting facilities (and lacks shade) and the increase planting and maintenance of trees in Public parks like Cromwell Park. Building on the Eastern Suburbs Banksia and other indigenous trees already in Cromwell Park - the community could be involved in supporting the connectivity of key bushland areas to increase canopy and wildlife habitat as a model for urban forest creation in Randwick.
48	About the dot points in the reasons why you have reduced the target: "limited control over private land; land use conflicts on public land, such as the need for sports fields and social amenities, which limit planting opportunities; large areas of green space outside Council's control, including golf courses, national parks, and institutional lands; financial constraints, with high costs associated with planting and maintaining trees; community perceptions that can limit support for urban greening efforts" I feel that golf courses and institutional lands such as the racecourse can contribute to tree and shrub cover. National parks are already green, but much of their area is not tall trees but coastal heath or similar. I support the suppression and removal of invasive weeds including trees such as European olive, green cestrum, hackberry, Acacia saligna, lantana, bitou, especially where they are choking native trees struggling to grow; also to limit their spread by bird-borne seeds. Including Cromwell Park, north side of Pioneers Park, parts of Randwick Environment Park. Even tuckeroos are starting to become weeds! Education and information from the council to the public, about what trees and shrubs to plant (or not) and what is a weed, would give people knowledge so they care and do more by feeling empowered. I leave the technicalities to your qualified staff, such as age, size, species, location, density and maintenance of plantings. Also to decide what is available at the nursery. People also need to know that they must not remove wood and tree branches, dead or not, from public parks, especially not for burning in their home or backyard!
49	Refrain from planting gum trees under overhead wires
50	Thank you for the opportunity to comment on the Randwick Council's 'Draft Urban Forest Policy'. In consideration of the Greater Sydney canopy target of 40% by 2036, I believe the policy target of 22% by 2040 does not take into account the density of urban infrastructure increasing the local area heat map. The imminent rising local heat will not be offset effectively by a 22% green canopy target in 15 years' time. As such, this 22% green canopy target increase by 2040 is insufficient and should be at a minimum 30% by 2035 and a local area green canopy target of 40% by 2040.

	As larger buildings are constructed to accommodate growing communities, the degradation of the current green canopy will far outpace the growth of new trees planted to replace them, if private and public property space is even available to accommodate them in our local area. I note there is no mention of connected tree canopy which at the detriment of our native fauna, a planned concise connected green canopy should be included in this policy. Within the policy, I would like to see it specified that any new planted species to be a native tree which offers growth to a height equal to the height of new builds and renovated buildings, particularly with the increase of multi-level urban accommodation approvals which are primarily replacing the single/double level homes in the Randwick City area. Native trees of height would offer shade to buildings, providing less reliance on powered cooling systems which increase demand on power supply in the Randwick City area. With the increase of building sizes and multi-dwelling developments in the Randwick City area, I suggest stringent ramifications to be included in this policy for all buildings which reduce the growth of a connected green canopy. The current ramifications do not disincentivise builders and developers from damaging the local green canopy and should include a range of injunctions (i.e. restrictions on PCAs who do not stringently assess and implement green space audits during building works, significant financial implications, registration with the building licence authority as a risk to environmental sustainability. These suggestions should greatly disincentivise any negative impact on the local green spaces and support a higher green canopy target which would be a great benefit to all who visit and live in the Randwick LGA.
51	Yes. The policy should allow council to offer incentives for existing developments on private land that do not meet the current tree canopy targets (such as most of the residential flat buildings in Randwick) to either add canopy to their sites or to contribute to the cost of meeting those tree canopy targets on public or private land. A form of retrospective offset requirement. The policy should provide for requests from the public to council to remove undesirable tree species from council land such as nature strips. For example, the fiddle leaf figs in the nature strip in Waratah Street.
52	the policy needs to be more ambitious- not less. There is increasing and indisputable evidence that we need increased canopy and greenspace to counter climate change and global warming.
53	While I appreciate the policy to “green” our area I strongly oppose Council interfering with a land owner who wishes to manage trees on personal property. If I want sun for my solar, to dry my washing or warm my home in winter that decision should be mine not Councils. Planting more deciduous trees on council land would allow residents to enjoy winter sun while having shade in the summer. If I wanted to live in a forest I would live in the country. You charge high Council Rates for our Coastal views then block these views with lines of high trees where lower growing varieties would serve the same purpose.
54	Yes, it's great to plant trees but they need to be maintained, looked after and carefully planned. I'm sure I'm not alone when I have noticed the number of falling trees and tree branches in recent times. Although tree canopy is great, having streets and parks with overgrown trees pose a major safety hazard to the community if we plant trees without careful planning and a maintenance plan.
55	Yes. The council should stay with the goal of 40% canopy and focus on education the community on why it is important and the benefits to people it would produce, such as cooling, cleaner air and water etc. there are plenty of empty parks with no people using them that could have canopy and so many streets without street trees. The council puts more time and effort into mowing and spreading pesticides than caring for the trees we have. Bushcare volunteers should not have to do all the work while maintenance staff spend their time mowing useless lawns. It's time for the council to take responsibility and make trees a priority.

56	Firstly great to see you are addressing this and putting in plans to increase tree Canopy and promote tree planting with the residents My main concern is the amount of trees that get demolished as part of the fast tracked CDC process/ building townhouses We have had 4 new builds around us in the last few years and each build has demolished at least 3 to 4 trees in gardens plus from or nature strip at front Number [edited by RCC] Dawes street had 3 to 4 beautiful large trees providing a lot of shade outside on nature strip and instead of the construction companies working to help maintain the trees through good planning / design of driveways they knock every one down and don't replace any Up goes two townhouse and no trees are replaced on the council strip . We now have 8 new houses and zero trees out the front I understand with the CDC process , builder are meant to replace trees inside the gardens but this never happens as they get private certifiers to sign it off . They should be Legally required to replace the trees - with council having final sign off to ensure this happens New residents are unaware they can request to have a tree planted. Also a lot of the new trees planted on Jennifer street died with the first month and were never replaced.
57	I agree there may be areas that require trees like Herron Park. Plan of management 1994 Malabar beach needs tall growth removed and low lying bushes or runners planted so that cut backs are NO longer required. We now have lowering of bushes cut back 2-3 times a year which is a waste of rate payers money. I have been trying to have 2 wattle trees planted opposite [edited by RCC] Bay Pde Malabar lowered or removed as they do not comply with height agreement in Plan of Management 1994 thus blocking residents views and coastal walkway views. I was lied to by the planting person who said they were wattle runners, fool me. The bush care people of malabar say the wattle is a nuisance weed. So in saying all of that I do hope whatever is planted suits the area and council is not always pruning back.
58	Please can you not use our rates money to plant trees directly under powerlines. Sure it ticks a box for someone today but creates a hell of a nightmare and expense for Ausgrid etc with repairs and blackouts 10 years from now. Think about Ireton St Malabar and the need to plant a certain distance from gas lines underground. This planting has created future issues for residents in this street and right across Malabar with similar new tree location examples. Complete waste of time & money!!
59	1. The target of 22% seems unambitious given the Greater Sydney goal of 40% - I would urge you to think bigger as urban heat in the coming years is likely to be a major health and wellbeing challenge. 2. I would encourage you to take further steps to plant trees on nature strips. A couple of years back there was a message from council asking if people wished to have trees planted outside their homes. While we have a large tree on our nature strip, many of our neighbours have none and clearly did not take up the offer. Is there a way of making tree planting mandatory on nature strip? If not, is there the possibility of greater education of home owners to encourage tree planting in a concerted campaign.
60	I write to express my support for the Draft Urban Forest Policy (June 2025), and to raise two key priorities that I believe are critical for enhancing local biodiversity and community safety: 1. Establishing a connected canopy corridor One of the significant challenges for arboreal wildlife - especially our local possums - is fragmentation of tree cover. The Policy shouldn't only strive for broad canopy targets, but should also explicitly commit to creating connected canopy corridors. Establishing continuous tree cover, particularly along streets and between green spaces, will reduce the need for wildlife to descend to the ground where they are vulnerable to predation and road collisions. Creating connected corridors may be able to partially mitigate Council's reduced tree canopy target by maximising the impact and benefits of the canopy we

do have.

2. Prioritising native over exotic species

I strongly endorse the Policy's aim to build a resilient urban forest by emphasising diversity. However, I urge the Council to go further by specifying that native species be prioritised in all public planting programs. Native trees and shrubs support local ecosystems far better than exotic species—offering food, habitat, and shelter for indigenous wildlife. A clear preference for natives will also align with best-practice biodiversity goals and help seedlings thrive in our local conditions.

Although I don't live in the Randwick Council area, I am a WIRES volunteer and regularly rescue injured and displaced wildlife from the LGA. Based on the rescue data we collect, I would be happy to work with Council to help identify potential hotspot areas for planting, particularly where canopy gaps currently force animals to the ground.

Thank you for preparing this meaningful Policy, and for the opportunity to provide input. I applaud the commitment to increasing canopy cover, community engagement, and the long-term care of urban trees. My suggestions are intended to strengthen outcomes for both nature and our community.

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I acknowledge that I have not had the opportunity to review the full volume of policies, projects, and supporting documents, but I wish to make the following observations and recommendations:

1. Risk of overemphasis on tall trees

The focus on planting trees with a minimum height of three metres risks skewing the policy towards upper-storey vegetation, potentially marginalising middle-storey and understorey plants. Prioritising canopy shade alone may conflict with the broader and more critical goal of supporting biodiversity.

2. Long-term impacts of large tree dominance

Once large trees are established, they tend to outcompete smaller trees and shrubs. Because mature trees remain in place for decades, such dominance can lock the landscape into a less diverse structure.

3. Importance of middle and understorey vegetation

Middle and lower storey plants provide essential habitat and protection for small bird species - such as finches, fairy-wrens, New Holland honeyeaters, silvereyes, and eastern spinebills - shielding them from both predatory birds and domestic cats.

4. Predator dynamics

Large trees tend to favour larger, often predatory bird species, including butcherbirds, cockatoos, currawongs, and noisy miners. These birds use high branches as vantage points and launch pads to harass and displace smaller species.

5. Observed trends in local bird populations

Over the past decade, the population of larger predatory birds in the Randwick LGA (including Centennial Park) has increased markedly, while many smaller bird species have declined significantly or disappeared entirely.

Recommendation

I urge Council to ensure that the Urban Forest Policy explicitly incorporates the planting and maintenance of middle-storey and understorey vegetation alongside large trees. A true urban forest is an ecosystem comprising trees, shrubs, groundcover plants, and the animals they support. This layered structure is essential to maintaining a balanced bird population - including small birds and songbirds - and sustaining overall biodiversity.

EXECUTIVE SUMMARY

Key message: A healthy urban forest is more than tall trees - it is a balanced ecosystem of canopy, middle storey, and understorey vegetation that supports

all wildlife, including small birds now in serious decline.

Concern

The Draft Urban Forest Policy's focus on trees with a minimum height of three metres risks creating a canopy-heavy environment that disadvantages middle and lower storey plants. Without these layers, biodiversity suffers - particularly small birds, which rely on dense shrubs for shelter from predators.

Why this matters

- Loss of small birds: Over the last decade in Randwick (including Centennial Park), numbers of small species such as finches, fairy-wrens, New Holland honeyeaters, silvereyes, and eastern spinebills have sharply declined or disappeared.
- Predator advantage: Large trees favour predatory birds (butcherbirds, cockatoos, currawongs, noisy miners) which use them as vantage points to harass and displace smaller birds.
- Locked-in impact: Once tall trees dominate, they outcompete shrubs and smaller trees for decades, limiting the chance to restore habitat diversity.

Recommendation

The Urban Forest Policy must:

1. Embed multi-layered planting - canopy, middle storey, and understorey - in all urban greening projects.
2. Set biodiversity targets that include measurable outcomes for small bird species.
3. Plan for balance - ensuring large tree planting does not overshadow or displace crucial shrub and groundcover habitat.

Conclusion

A forest is not just trees - it is an interconnected ecosystem. By protecting all vegetation layers, Randwick can create an urban forest that is cooler, greener, and alive with the full diversity of birdlife for generations to come.

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Recently I returned from a trip to Europe, and I noticed that many cities and towns have introduced relatively easy to implement bio-diversity projects by reducing their lawn-mowing frequencies and thereby re-introducing and integrating natural environment into the cities and urban areas. I have been a bush care volunteer for the last 10 years, and I have an interest in birds, specifically the smaller songbirds. It's well known that nature is under pressure. Plants, animals and birds cannot keep up with the pace of change that humanity is forcing on them. Many species are declining quickly, and a large number will be going extinct, if we don't act.

We are facing a catastrophic bio-diversity crisis, and we need come up with solutions. We can help by re-introducing biodiversity in our immediate environment and make space for the plants and animals that we share the land with. It's proven that this works.

We have good solutions. It's a matter of implementation. And in the Randwick City Council area we have the opportunity for a significant contribution to improve biodiversity and environmental sustainability by changing our land management in small ways.

Submission – reduce grass mowing cycles

One of the quickest ways to re-introduce biodiversity and improve environmental sustainability is by changing the landscaping and mowing policy. The aim is to transform significant proportions of now bare lawn to “rough” grass strips and fields and thereby providing habitat for flora and fauna.

Randwick has significant swaths of land under their care, which are mowed and maintained on a regular basis. However, the same land can be used to provide food and shelter for insects, birds and small animals. To do this, suitable areas need to be identified, where in sections the number of mowing cycles each year can be reduced, and give grasses and flowers the opportunity to grow through their normal lifecycle.

Several councils have also extended this policy, where specific habitats for butterflies or bees are created on verges and in streets by seeding or planting selected suitable flora for the targeted species.

The key concept is that we should utilize parts of low-cut grassy areas, that have minimal ecological value and allow these to become areas that have high

biodiversity value, which would complement and build on the successful tree planting scheme that is current policy.

Target areas: Which grassy areas.

We have large areas of immaculately kept lawns in the Randwick Council area. Just in my immediate vicinity of the Prince Henry estate in Little Bay, we have the La Perouse Headland with vast fields of low-cut grass. There are two more grass fields adjacent. We also have many grassy areas along Bunnerong Road, between Anzac Pde and Little Bay Rd and several kilometers of short mown grass in the center and on the inside verges of Anzac Pde. In the Prince Henry area itself, we have large grassy areas along Pine Ave. All of these areas are potentially suitable.

Areas where the grass is kept short have, by themselves, barely any biodiversity value. The number of plant species is very limited as is the number of insects and bird species present. However, short grassy areas do have some aesthetic appeal (not for everyone) and do have value for recreational, dog walking and sporting purposes. We have large areas of lawn that are not used for recreational purposes that could provide significant benefits to the area's biodiversity. Letting grasses, flowers and small plants grow provides food for native wildlife in the form of leaves, sap, nectar, fruits and seeds attract. The effect is cumulative. The longer we leave these areas to grow and diversify, the more species they support, which consequently supports an even larger diversity. For example, insects attracted to grasses and flowers, bring small birds attracted to the insects. Guano from the birds, brings seed diversity and larger insects, which attracts lizards, which then feed a broader array of birds.

It's important to have as many native grass and flower species as possible, as our wildlife and flora have evolved together, and plants, insects and birds often depend on each other.

Environmental challenges.

Insects declined by almost 50% worldwide

Worldwide, including Australia, insect numbers are dwindling at an alarming rate. Some estimate it to be 50% in some areas, the current estimated rate of decline is 4% per year. There are many reasons for the fall in numbers, such as pest control methods, high-intensity agriculture, etc., but the greatest underlying cause is the decline, fragmentation and disappearance of insect and plant habitat, those fields that contain grasses, herbs and wildflowers.

Decline in small birds.

Australia wide and in the Randwick Council area, there is a steep decline in small birds. Annual bird count statistics show that 60% of Australian bird species are in decline. (3) (4). The last time I saw Eastern Spine bills in my garden was over a decade ago. Birdlife observations show a steep decline of small birds withing the Randwick area.

This decline has many causes, but primarily it's the loss of habitat; the loss of seeds from grasses, the pollen from wildflowers, the insects that live in the grass. Without these, the birds that feed on the nectar, seeds and insects can't survive.

Iconic birds: birds of prey

Kookaburra's, Owls and Peregrine Falcons survive on small animals such as native mice, geckos and lizards, who have lost their habitat. Bring their environment that provides food and shelter back and these birds will thrive.

Fragmentation due to Urbanization

Buildings, roads, infrastructure, sporting fields, lawns and fences break up habitat, preventing many wildlife species from finding food and move between areas. Even small grassy areas can be a vital link, forming wildlife corridors supporting wildlife that tree corridors cannot.

Examples of Mowing policies

In this proposal, a change in mowing philosophy and policy is key.

[submission included a series of images and references related to the submission not included in this report].

Thank you for the opportunity to provide feedback on the 'Draft Urban Forest Policy' ('the Policy'). Canopy Keepers East views the Policy as a welcome addition to Randwick Council's suite of policies.

As we see it, broadly speaking, the Policy is a thorough and pioneering document. It speaks to Randwick Council's commitment to creating biodiverse and liveable environments within its LGA, and its willingness to clearly outline how the preservation and enhancement of urban forest is to be achieved. That said, Canopy Keepers East has some feedback that we wish to provide on a number of aspects of the Policy.

To begin, we have concerns that the revised canopy target of 22% is too low, and out of step with the revised targets set by comparable LGAs. We appreciate that a revision is required to produce a more achievable target, to meet the specific needs and environmental circumstances of Randwick LGA, however we are concerned that 22% by 2040 is inadequate and lacks ambition. While we understand that Randwick LGA has one of the lowest rates of canopy cover of any metropolitan LGA, we are concerned that a target of 22% fails to meet the hopes and expectations of residents within the LGA. The City of Sydney has historically had a similar canopy rate to Randwick LGA and faces many of the same barriers to expanding canopy. In fact, its multiple major roads and built up commercial spaces present obvious obstacles to planting that Randwick LGA does not have to contend with. Notwithstanding those limitations, the City of Sydney have sought to increase canopy cover to 23% by 2030 and 27% by 2050. We urge Randwick Council to consider setting a more ambitious canopy target that mirrors community expectations.

Additionally, the City of Sydney has developed a separate target for 'green cover', that is, ground cover, bushes, plants and shrubs. This target sits in tandem with the canopy cover targets. We would also like to see Randwick LGA adopt a target for green cover more broadly, as this could include the bushes, shrubs and native grasses that form part of the urban forest found within the Randwick LGA. For example, the land that hugs the shoreline and its immediate environs within Randwick LGA may be less suited to the planting of large trees but a prime location for native grasses, ground cover and coastal heath.

We also believe the Policy should refer more explicitly to the creation of 'connected habitats' and 'nature corridors'. While "enhancing wildlife corridors" is listed as a "Policy Objective" (see 1.1) the Policy does not otherwise refer to or outline how this particular objective will be achieved. Increasing canopy cover is an important goal in itself, but if the canopy cover does not intersect and overlap, its capacity to provide a safe habitat and corridor to wildlife is greatly compromised. For example, brushtail and ringtail possums use interconnected canopy as a means of crossing roads and traveling around their habitat in search of food and shelter. To disrupt or disconnect a wildlife corridor isolates possums and leads to species decline in the isolated area. We would like the importance of connected canopy to be acknowledged by the Policy, with specific reference to how it will be achieved.

Building on the above, we also strongly believe that planting decisions should take into account what plant species provide food sources to native wildlife, and during what periods of the year, with an emphasis on planting native species as much as possible. For example, Coastal Banksia trees provide an essential food source to grey-headed flying foxes and nectar eating birds during the colder months when other food sources are scarce. The removal of a significant number of Coastal Banksia trees within the LGA (some of which had reached the end of their life and became structurally unsound) and replacement planting of non-flowering native trees puts significant pressure on grey-headed flying foxes and rainbow lorikeets during the winter months, and results in these species moving towards inappropriate food sources in conflict with humans (for example, recently a grey-headed flying fox became entangled in fruit netting in Maroubra while trying to find food in a backyard fruit tree).

Further, we would suggest including a reference to “reducing the amount of shade that falls across a property” as an additional example of an insufficient reason to remove or prune a tree (see 4.2.7 and 5.1.2).

We would also like Randwick Council to take the initiative of planting more trees on nature strips in residential streets without waiting for residents to ‘request a tree’ (see 3.1.1). Planting on these accessible and readily available tracts of council land is an effective way of creating canopy cover that is both connected for habitat and accessible to council officers for maintenance.

We support the use of damage deposits and urge Randwick Council to consider implementing this measure as soon as possible. Additionally, we urge Randwick Council to direct resources into overseeing whether private certifiers are complying with arborist reports through the various stages of the building cycle. It is apparent to the community that the requirements established in an arborist report prepared in connection with a DA are rarely complied with (i.e. requirements to mulch around exposed roots within the RPZ following excavation), with Randwick Council’s building surveyors and rangers not approaching these breaches as significant enough to warrant remedial action or escalation to NSW Fair Trading for investigation. Ultimately, if Randwick Council wishes to treat trees as “long term assets, similar to utilities and the built form” (see 4.2.1), we believe that damage to trees and plants done in connection with construction activities should be treated as analogous to damage done to public and private infrastructure.

With regards to decisions made to remove trees (see 4.2.6) we would like there to be clarity about the process council staff will follow prior to making a recommendation for removal. For example, in circumstances where a resident alleges property damage, the community expects that Council will independently assess whether such damage has occurred, and whether there is indeed a risk to public safety or public/private property that cannot be mitigated. We also expect there to be a clearly stated standard of the information required, that applies to Council and residents alike. We urge Randwick Council to be as transparent about this process as possible so that residents can understand these decisions and learn to trust the judgment of Council officers. Importantly, we would also like the Policy to differentiate between circumstances where a tree is said to be damaging public/private infrastructure that is non essential (i.e. a brick wall that does not form part of a habitable dwelling) or relatively easily repairable (i.e. a footpath). Even though this distinction may be addressed in more detail in the ‘Tree Management Technical Manual’ and ‘Claims for Damages’ procedure document, we believe it warrants inclusion in the Policy.

We are very pleased to hear that you intend to increase the communities awareness of the benefits of trees. Canopy Keepers East would relish the opportunity to work with Randwick Council to achieve this goal. Canopy Keepers East represents a network of residents within the Eastern Suburbs of Sydney who value trees and appreciate their presence in our local communities. Through Canopy Keepers East, you have access to a network of people who want to see this Policy succeed, for the benefit of all residents. We would also be grateful if we could be included in the notification process when a tree is scheduled for removal (see 6.1.1). This would ideally be via direct email: east@canopykeepers.org.au

In relation to the Policy’s proposal to engage with private land owners (see 6.1.3), we invite you to consider various incentives for private landowners to retain and cultivate canopy. For example, perhaps Randwick Council could consider a small, annual rate reduction to reflect the portion of a block that contains canopy coverage. For those who live in apartment blocks, perhaps the rate reduction could be earned through volunteering with a local Bushcare group. Additionally, Randwick Council could support managers and owners of larger tracts of lands by providing free advice and planting (almost like an extension of the Native Havens program for larger non-residential spaces). We also suggest that Randwick Council emphasises the way in which mature trees can raise

property prices of surrounding residences as a strategy of engaging land owners (see AECOM's 2017 report 'Green Infrastructure' for more information about how street trees impact the value of properties).

Thank you again for the opportunity to provide feedback on the Draft Urban Forest Policy. We are available to discuss our feedback further should that assist.

64 I am very supportive of the policy for the all the reasons stated. However, I have a number of concerns that I hope can easily be addressed.

Firstly, RCC must take some responsibility for the location and type of trees used for the planting. My two experiences both occurred in my previous location at [edited by RCC] Burnie St. The first event was a very large banksia fell from a tree and smashed the top of my windscreen which damaged the entire windscreen. When I rang the RCC to advise of the matter I was not believed. Large banksias fall onto the road near where I live and I see the potential for the same problem, or worse a person being injured. I'm just asking for consideration about the management and selection of these trees.

My second concern was a RCC planted tree outside my property blocked the sewage line, resulting in a cost to me of \$40, 000 to repair. The combination of the RCC policy that its not their problem (but I have no rights about location or selection of the tree) and Sydney Water policy that it is the owner's responsibility between the property and the main drainage lines, should put a greater onus on RCC responsibility to consider location and type of trees used.

I was also disappointed to see that the current arrangement whereby a tree can be thinned (I think by up to 20%) is not retained in the current policy to address matters of light, breezes and aesthetic. Looking at ugly trees is not consistent with the policy. Particularly when this is coupled with the policy statements on no pruning for incursion on property or views.. Looking straight out to a dense and unpruned tree is not a great experience, and I'm sure is not the policy intention.

Lastly, the prohibition on pruning to enhance solar panels effectiveness is contrary to all attempts to electrify our energy system using local systems. I'm sure this contradicts RCC's own energy and decarbonisation plans. There needs to be further consideration of how to address the energy electrification program and the greening program to in parallel.

65 I commend Randwick Council for the draft Urban Forestry Policy. My comments are:

- I would like to see the tree canopy percentage increased from the proposed 22% to a minimum of 30% (given the stated limitations on achieving the desired 40%).
- To maximise potential canopy, I would like to see included in the Draft a section on planting on the Council verge as per Randwick Council's STREET GARDEN GUIDELINE, and promotion of native vegetation/trees on the verge.
- I feel strongly that a review of the Register of Significant Trees (to commence in 2025) and the development of effective procedures for Tree Vandalism and Claims for Damages are critical elements to 'raise awareness' and 'educate' the public of the Council's dedication to maintaining important trees and increasing the tree canopy.
- The Randwick Street Tree Masterplan is a wonderful resource document-I wish I had previously been aware of it. I have recently thanked Randwick Council for planting trees in my street, although in my case the tree planted does not appear to have been in accordance with the Street Tree Masterplan. I would have preferred a tree in compliance with the plan!

Thank you for the opportunity to comment.

1.0 Purpose –

- I would add to the bullet points, noise reduction or traffic noise mitigation.
- “established urban forest” – consider the alternative phrase “dynamic urban forest”

1.1 Objectives

- “manage trees as a collective” – Yes! Think of the “forest” not of the individual trees.
- “improve the age spread” – this is good, but thinking about rotational age and distribution patterns might be helpful.
- Increase awareness of the value of trees. I know of an app from the USDA Forest Service that might be adapted for your use, perhaps in collaboration with NSW Uni. (see section on community education)

2.0 Scope -

- This section is very short. It may be helpful to describe the existing scope a little. How large is the area? What are some of the current conditions? Approximately how many trees? Ratio of native to exotic? Range and distribution of tree age classes? Etc.
- Also, this is a good place to list anything you are intentionally not covering in this plan. What are the limits of your scope?

3.0 Value -

- 14,000 sq. m. sounds like a lot, but can also be expressed as 1.4 ha., which does not sound like a lot. It’s good to provide context. What is the total area of these “key bushlands”?
- Mapping 10% of bushland each year will lead to a complete survey in 10 years, or so. How much has already been done? Can the public help? What mapping tools are you using? After mapping is done, will the first areas be remapped as part of an ongoing inventory?

Tree Species

- It’s good that you value diversity. Beyond species, diversity can include age range, structural diversity, vertical, and horizontal diversity. Diversity can also be expressed at different scales. It’s generally a bad idea to only have one species in a single street or housing area. Identifying existing areas of low-diversity or mono-culture can help prioritize areas that might be more susceptible to disturbance factors (like insects or climate change).
- Is data from the NSW government the only measure of tree canopy the city will use? There are lots of sources of this kind of data, often from remote sensing and sometimes at little to no cost.

4.0 Tree Protection -

- 4.1.1 and 4.2.7 Perhaps there should also be a place for citizen scientists to help identify potential tree problems before they become serious? That might take the form of a digital drop-box where people could fill out a form to identify trees they are concerned with.
- 4.1.2 Existing site coverage – What is the scale under which the 10% change and the 22% achievement in 10 years will be measured? Is it each development lot or maybe a larger unit? What is the minimum height of the canopy to qualify?
- 4.1.4 Significant tree registry – How are trees added to the registry? What are the criteria?
- 4.2.6 Tree Removal – This is often the most controversial part of an urban forestry plan, but it also may be the most important. Trees are living things and they have a life cycle. It is important to know the current condition of an area/street and to compare that condition with the desired state. I believe that there

are circumstances where it is necessary to remove healthy mature trees to increase species and age diversity. In the long run, this can be more beneficial than to have all the even-aged trees in a street die within a decade of each other or succumb to a disease common to a single species within a few years of each other. I have seen this happen in other cities and the street character changes dramatically as suddenly there are no mature trees. It is better to plan for rotation of trees in a controlled manner. This sometimes includes consideration of “significant trees”.

5.0 Tree Management

5.1.2 Pruning – I don’t know what AS4373 says about pruning trees. Some trees should only be pruned from below (mostly conifers), some trees can be pruned throughout their crown. Generally you should never remove more than 2/3 of the live crown (less is better). In an urban setting it is important to consider balance and the scale of the canopy in comparison to the root structure. It is easy to over-prune and create an unbalanced tree that will fall in a wind storm or to manage a tree crown to have too large a canopy for its support and nutrient structure.

5.1.6 Information – this could be a good place to enlist citizen volunteers to help fill out your data sets.

6.1.2 Community education regarding value of trees – I will share a link to program developed by the USDA Forest Service and others to estimate the value of individual trees. I think this app could be adapted for use by the City of Randwick. This adaptation might be a collaborative effort with ANU and UNSW and the folks at I-Tree. <https://www.itreetools.org/> I think I-Tree is already being used in other counties beyond the USA.

Possible Measurements or Key Performance Indicators – I think it makes sense to state your performance measures up front. You might want to add a section about this.

- Percent tree canopy – target 22% at 2040. This is not a very ambitious goal when compared to various global cities, maybe if we knew the current condition, it would help people understand.
- percent vegetation cover
- percent permeable surface area

All of these things are readily monitored at low cost through remote sensing. I’m sure we can come up with more measures if needed.

Collaborate with the Men’s Shed(s) -

One of the most controversial things an urban forestry program can do is remove mature trees. These trees are beloved by the residents and they add significant value to the properties. However, sometimes trees must be removed. I think tree removal should probably happen a little more often than it does. A street with 20 mature trees might benefit from a planned succession that removes one tree every 5 years to move towards, and eventually create, a street-scape that is more diverse and more resilient.

My colleagues and I at the Waverley Men’s Shed had an idea that might help ease the pain and sense of loss when a neighborhood loses a tree – whether it was a planned removal or response to an emergency. If the council crew collects a portion of the removed tree and delivers that to the Men’s Shed, with full provenance of the collection, the craftsmen of the shed can turn the green, unseasoned wood into a useful product and memento of the beloved tree. Such products might include bowls, plates, plaques, spoons, and carvings. With time to dry the wood, we might be able to produce stools, picture frames, bird boxes, etc. Of course, not all timber is good for all applications. These items could then be given, or sold by the city, to the neighborhood residents to help assuage their mourning for the beloved tree.

Summary of Main Points

1. Consider the urban forest at multiple scales including: tree, street, neighborhood, and city. Adapt concepts from wildland forestry to the urban environment. These concepts could include age rotation, desired density, pruning and thinning to build desired conditions. Sometimes you may need to plant far more trees than you desire to get the correct number at maturity age. Plan and look for opportunities to increase diversity of age, species, size and structure of trees. In some cases this may mean removing mature trees from a contiguous block of uniform trees.
2. Leverage the community of “citizen scientists” to help inventory, gather information, and proactively manage the urban forest.
3. Use modern tools to gather information including I-Tree and remote sensing. Develop key monitoring indicators that are easily gathered and periodically updated. These indicators may go beyond just measuring trees to include all vegetation and total site permeability (for water).
4. Develop a partnership with local men’s sheds to create craft items for sale, gift, or award to concerned citizens, valued volunteers, and visiting dignitaries.

Thank you for your time and consideration. I’m glad you asked the public to comment on your draft plan.

67 Heritage NSW submission

Heritage NSW appreciates the opportunity to comment on Council’s Draft Urban Forest Policy 2025 (Draft Policy). We have considered the Draft Policy and prepared the following advice.

Heritage NSW supports many of the initiatives in the Draft Policy, including the following identified heritage considerations, when determining tree applications:

- prioritisation of the retention and protection of significant trees for their heritage significance
- the heritage significance of a tree, or the property where a tree is located.

Heritage in Randwick Local Government Area

We have undertaken a review of the National Heritage List (NHL), the State Heritage Inventory (SHI) and the Aboriginal Heritage Information Management System (AHIMS), and note that the Randwick Local Government Area contains:

- 2 National heritage places
- 31 State Heritage Register items
- 2 Aboriginal Places
- 81 Recorded Aboriginal Sites
- 493 Local heritage items
- 19 Local heritage conservation areas
- 210 Section 170 Register items.

We note that many of the above places, items and sites include significant trees, landscape and Aboriginal cultural heritage and environmental heritage values.

Recommendations

Noting the above, Heritage NSW considers that there are opportunities to strengthen the heritage considerations in the Draft Policy, and recommends the requirements for review of proposed tree applications are amended to include:

- review of the NHL, the SHI, and AHIMS, to identify whether a tree is on a site that is heritage listed, and determine if the tree is identified as having heritage significance
- consideration of the Conservation Management Plan (CMP), if one exists, for a heritage place, item or site, to determine if the tree is identified in the CMP as having heritage significance
- where a tree application impacts on:
 - o a National Heritage Listed place, undertake consultation with the Australian Government Department of Climate Change, Energy, the Environment and Water
 - o a State Heritage Register item, undertake consultation with Heritage NSW
 - o an Aboriginal Place or Recorded Aboriginal Site, undertake consultation with the Aboriginal community and with Heritage NSW.

68

Congratulations on an excellent Draft Urban Forest Policy.

Over the first half of this year I have received encouragement from Council, notably Mayor Dylan Parker and councillor Philipa Veitch, for my proposal for shaded Pedestrian Green Links, intended to connect elements of the Green Grid to town centres and transport hubs.

This was an idea mooted by the Greater Sydney Commission and taken up by Waverley Council.

The GSC plans said: The Greater Sydney Green Grid is a long-term vision for a network of high quality green spaces that connects communities to the natural landscape. It links tree-lined streets, waterways, bushland corridors, parks and open spaces with centres, public transport and public places. Your Draft Urban Forest Policy (DUFPP) definition is: A green grid is an interconnected network of green spaces across the city that encompasses various open spaces, including parks, waterways, and urban connections, to enhance biodiversity, promote healthy lifestyles, and improve a city's resilience.

The DUFPP also says in the last paragraph under the heading Purpose: As urban heat becomes an increasing problem in densely populated areas, we will work closely with our community to establish trees in areas vulnerable to high urban temperatures. Cooler active travel routes and shading of buildings will support the community to reduce emissions.

However, the following section on Policy Objectives does not include an Objective: to establish cooler active travel routes to reduce the urban heat island effect for pedestrians, which is what I am suggesting.

Under the heading Trees and Project Planning, the DUFPP says: We will plant street trees in accordance with the Street Tree Masterplan to ensure the coordinated development of streetscapes that are attractive, functional and deliver the appropriate canopy cover for that street. So, the Street Tree Masterplan (STM) would be the key document for establishing cooler Active Travel Routes of Green Links.

The STM under the heading Methodology says: The types of opportunities that have been identified are:

- buffer streets
- corridor streets
- streets adjacent open space, and
- approach streets

For this task, the analysis maps from Section 2.3 were used as a base and then the key streets for each opportunity were identified.

I suggest enhancing the STM by adding as an Opportunity: active travel green links, with a description in the following Opportunities Overview. Then, according to your green grid urban connections, the key streets for this opportunity could be identified for each Precinct.

Thank you for the opportunity to comment on RCC's Draft Urban Forest Policy.

I have a few points I want to make:

- Firstly I would like to say that Randwick City Council have adopted a disappointingly very small target urban tree canopy cover, watered down from 40% by 2036 to the revised 22% by 2040. This is very unambitious! Especially given that we ratepayers now have to pay an environmental levy each year, every year from now on. Surely some of the money could be used to fund tree plantings along our often bare streets, and expand tree plantings in our parks? The Environmental Levy could supply the cost of maintenance into the future too.
- There are way too many grass verges which are not used for anything! They require mowing – which is a waste of energy (petrol/diesel/electric) . Perhaps more verges could be planted out with trees, small shrubs and groundcovers, mulched with tree trimmings from pruning trees under electricity wires? A lot of time and energy could be saved from not mowing!
- Where is RCC “improving the connectivity of key bushland areas by planting and maintaining 14,000m2 of native and indigenous ground covers, shrubs and trees”? [page 7, section 3]. Are these areas specific corridors or just random areas of bushland dotted around the City?
- Further to my last point, I am a member of Friends of Malabar Headland and would love it if Council could increase native bush corridors at South Maroubra and the northern side of Long Bay, Malabar, to connect the bush of Malabar Headland NP to urban vegetation: see map below – the pink edged areas need more native trees – but NOT Tuckeroos! [Cupaniopsis anacardioides] - See my next point below.
- Please, no Tuckeroos to be planted as street or garden trees within 1km of bushland!! Years ago we had to contend with Bitou, Lantana & Pampas grass infesting the bush on Malabar Headland. Now we are constantly taking out Tuckeroo seedlings and saplings, due to birds dispersing the seeds. Each tree is a very prolific seeder! Maybe someone could produce a sterile version? They are a tough fast growing shade tree, but they're very invasive of bushland!
- Pest fauna & flora [page 7, section 3]. Is RCC conducting fox-baiting anywhere? Malabar Headland has a resident population, often seen in broad daylight. They feed on rabbits and rats (see attached Thesis and Summary by Stepkovitch, 2017) but will eat almost anything – plants, insects, skinks, birds, snakes, etc. They are a terrible problem and I would like to see something done about them; obviously NPWS are responsible for MHNP, and The Federal Department of Finance are responsible for the Rifle Range, but both are situated in Randwick City, and foxes don't recognize land boundaries.
- Section 3.1.1. Increasing Canopy Cover: Randwick has a low tree canopy cover because we have very sandy soils, which once supported the very diverse Eastern Suburbs Banksia Scrub (ESBS) – all the way from La Perouse to the City of Sydney – growing on ancient sand dunes, which were free-draining and lacking in nutrients. Each plant evolved in a specific niche, thriving when conditions were suitable, in a symbiotic relationship between plant roots and delicate soil fungi; hence the astonishing diversity. Unfortunately, 97% of the ESBS was destroyed and the sand taken for building materials since White Settlement. What remains is sand with a broken or destroyed soil fungal system, unable to hold water or exchange nutrients with plants. The result across most of Randwick City is that plants fail to thrive, and trees take a long time to grow tall, or remain stunted. Serious efforts should be put into improving the soil, addition of fertilizers and compost when planting, if we want more tree canopy. Maybe we could use some of the vast amounts of compost being generated by the FOGO scheme to enrich tree plantings in Randwick City?

- The biggest threat to our tree canopy cover is the pressure from State government to increase population density. Whole gardens will disappear under high- and medium-rise blocks of units; large gardens will be destroyed by subdivision, or disappear due to knock-down and construction of dual occupancies, now allowed on smaller blocks than previously. Every development diminishes the space available for trees. The overall trend for urban canopy is inexorably downwards. No wonder Randwick City Council have modified their target from 40% to just 22% tree canopy cover: it will be virtually impossible to attain even this modest increase, in my opinion. In fact, the current tree canopy cover of just 16%, one of the lowest of any LGA, is probably going to go even lower given the number of mature gardens and trees which will have to be destroyed to accommodate more population.

- Greater population wouldn't be such a bad thing if a commensurate amount of NEW green space was being created, so that the incoming population had adequate open green space and parks to go to. Instead, there will be much increased pressure on the EXISTING green and open recreational spaces, leading to inevitable over-use. If the State government insists on Randwick taking more people, building more dwellings, RCC should insist that the State government funds new parks, and provides the land for them near to the areas of higher population densities.

- I have a suggestion for creating a small forest near my home: There's a steep triangle of grass between the junction of French St with Maroubra Rd (see screen shot from Google Earth below): there's a couple of trees behind the bus stop, and until recently, there was a large old Banksia further down the hill. This area could become a small forest, it's completely bare, except for exotic (weed) grasses; it requires mowing and is not used for anything at all. Trees that grow very tall could be planted here, as the powerlines are over the Maroubra Rd pavement. There would be no need for an understory if there are worries about criminals lurking; however, a shrub layer about 0.5m tall, and mulched, would mean never having to mow grass again. Or, alternatively, a small community garden for veg? The slope is quite steep, but it would be great to grow trees or veggies on.

Google Street view from French St, my pink mark-up.

- In my opinion, if you take a look around, there are literally hundreds of such sites. All could be planted with trees.

- Transgrid: the people employed by the electricity poles and wires owners are tree butchers. If you watch them work, they regularly halve the street tree canopy cover by about 50%! This is not really necessary. I recently read about power line clearances in South Australia – in urban areas with low voltage powerlines, where there's no risk of bushfires, they now clear only 300mm from powerlines instead of 1m. In some places, powerlines can be bundled together. I read this online, in the comprehensive notes from a talk about urban forests: Protecting our urban forests and enhancing biodiversity –

Boroondara Council (Melbourne E. suburbs) 11-8-2025

<https://lighterfootprints.org/protecting-urban-forests/> <https://lighterfootprints.org/protecting-urban-forests/> There's a summary page:

<https://lighterfootprints.org/urban-forests/>

The whole article is worth reading, there's some very good ideas and some case studies which could add to Randwick's ideas about tree canopy. For example, here's a box on the carbon neutrality of trees:

- Also some extraordinary data on the health benefits of urban tree canopy:

There was so much information and so many good ideas, I really think RCC staff should have a look at it: <https://lighterfootprints.org/protecting-urban-forests/>

There was a Q & A session, also written up: Questions about imposing fines for destroying or poisoning trees – should they be higher? Making an example of the perpetrator, etc; funding a compliance officer; making sure that new developments plant the specified number of trees and that they look after them; checking to see the trees are still alive after 5 years, and if not, making the developer/owner plant replacement trees; A Rotary Club verge planting project; education and workshops for verge projects; free trees; landscaping advice for private gardens; restoration of a creek line by locals with help from Council... A feast of great stuff!

Thank you for the opportunity to comment!

70 Kingsford East Precinct

RESOLUTION: That the Kingsford East Precinct support the intent of Randwick Council's Draft Urban Forest Policy and provides the following specific feedback:

- That Council be more ambitious in its target for canopy increase.
- Supports the retention of large mature trees, not only for their cooling and biodiversity, but for their landscape qualities.
- Ensure the implementation of policy is followed through in Development Assessment, to reduce the loss of important street trees.
- Greater protection and replanting of street trees – replace two for the loss of one street tree.
- Remove dangerous trees from curb, such as Yucca trees.