



Department of Sustainability and Environment

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24 September 2009

Mr Lenny Jenner
Chief Executive Officer
Borough of Queenscliff
PO Box 93
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Our Ref: WD-GE-94-7191

Dear Mr Jenner

TREE MANAGEMENT, REMOVAL AND REPLACEMENT STRATEGY FOR PRINCESS, CITIZENS AND VICTORIA PARKS

Thank you for providing the Department of Sustainability and Environment (the department) an opportunity to comment on the August 2009 draft Tree Management, Removal and Replacement Strategy for Princess, Citizens and Victoria Parks, Queenscliff. I am pleased to provide these comments, and apologise for the delay.

I note this strategy report follows and expands on previous arboricultural reports commissioned in 2008, and on a number of tree failures, and near misses experienced in the last 2 years.

- Council manages the Crown land reserves addressed by the Strategy as a committee of management appointed under the *Crown Land (Reserves) Act 1978*. Among other things, this Act requires Council, as a committee of management, to maintain the land for the purpose for which it is reserved. The subject reserves are reserved for a range of purposes that encompass public access and recreation. Together with previous surveys, the Strategy represents an appropriate active approach to providing and maintaining tree safety and management.
- The department supports the application of a risk management approach as recommended in the Strategy. In relation to exotic trees, the department's interest relates primarily to safety. Whilst the trees contribute greatly to the reserves' heritage values, Council should actively address safety.
- Despite the apparent amenity impact of the numbers of trees identified for removal in the short term, the department does not advocate widespread use of intrusive arboricultural techniques such as cable bracing and propping as a means to extend the safe life of mature and over mature trees.
- Council should consider the relevance of planning permit requirements for removal destruction and lopping of native vegetation contained at clause 52.17 in the Queenscliff Planning Scheme to implementing its recommendations for Moonah at Victoria Park and elsewhere. Whilst a detailed treatment of these implications is potentially beyond the scope of the Strategy, much of the coppicing, pruning and removal of Moonah trees proposed appears to require a planning permit/s, and generate the need for appropriate native vegetation offsets. The department will be a referral authority for permit applications to lop or remove native vegetation recommends an early discussion regarding application requirements. The department regards works to Moonahs recommended to



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proceed prior to summer 2008/9 as consistent with the 'Emergency works' permit exemption at table 52.17-6 in the Queenscliff Planning Scheme.

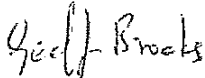
- Nevertheless, the department regards the Moonah trees in Victoria Park as an important biodiversity asset, and expects Council to positively manage biodiversity values as well as risk and other public use issues. The avoid, minimise and offset principles in "Victoria's Native Vegetation Management – a Framework for Action" are particularly relevant considerations, even for trees that have been identified for short term removal. Potentially some of the proposed Moonah reserves could be reconfigured to include some of these trees.
- Council must also apply to the department for a permit to take protected flora under the *Flora and Fauna Guarantee Act 1988* (FFG Act, form attached). In considering an application the department makes a conservation effects decision guided by the impact on the vegetation community and major conservation activities proposed as a result of this loss irrespective of risk or other reasons for removal.
- The issue of risk to campers in Victoria Park is highlighted clearly in the Strategy. The challenge of managing trees for shade, shelter and safety is common to many Crown land caravan and camping parks. Resolving what the risk means for the future of camping at Victoria Park is beyond the scope of an arboricultural strategy and requires a further focussed investigation or review. The Caravan and Camping Parks on Coastal Crown Land Reference Group Report (May 2006) recommended that:
 - the department develop best practice management guidelines (BPMG) for Crown land caravan and camping parks and
 - caravan park managers should develop park management plans for endorsement by the department.

The department is currently preparing BPMGs as recommended, and will contact Council as they are progressed for release. Decisions to significantly change camping capacity should be made within a park management planning exercise.

- Council should engage an appropriate native flora consultant to provide specialist advice to further guide the siting, layout and timing of the proposed Moonah Reserves, to incorporate optimum biodiversity outcomes from this initiative.
- Given the timing and scale of proposed works over the three parks, at this point the department supports adoption only of the Moonah Reserves identified for year 1 as an immediate risk management measure for the 2009/10 summer camping season. Depending on how Moonah Reserves are developed and managed, they could increase native vegetation quality, and provide native vegetation offsets. Similarly they could be developed to contribute to conservation effects outcomes associated with FFG Act permits. The department is able to assist Council in further detailed development of management proposals to these ends.

Please contact me on Tel: (03) 5226 4693 if you wish to discuss this letter generally, or Donna Burns on Tel: (03) 5226 4508 in relation to native vegetation matters.

Yours sincerely



GEOFF BROOKS

Manager Statutory Planning Services

Encl.