



Nicholas Dufty
Planning Policy Manager | Strategy and Engagement
Department of Planning, Lands and Heritage
140 William Street, Perth WA 6000
21 May 2024

Dear Nicholas,

RE: Perth and Peel Urban Greening Strategy (UGS) – Interim Advice Note

I am writing on behalf of the Australian Institute of Landscape Architects with regards the UGS currently in preparation. We thank you for taking the time to meet with us and in providing a timely briefing. We confirm our support for the strategy and eagerness to see it strengthen.

We have prepared this Interim Advice Note for your review and adoption in the UGS as appropriate. As you are aware we have consulted broadly with allied institutes and related advocacy organisations.

We look forward to meeting with you to step through the points and to provide further clarity as required. We intend to follow up again formally once we have another round of coordination with our alliance group that we have met with.

Interim Advice Note & Feedback

Theme	Key points
Overarching Vision	<ul style="list-style-type: none">● AILA Perth Vision: A Cool, Shady, Connected and Biodiverse Perth that urgently delivers Healthy, Liveable and Climate Resilient Cities and Towns - Grounded in our unique Culture and Place. <p>Critical Resource: (Urban Green Infrastructure (UGI) — Planning and decision framework): https://www.aila.org.au/Web/Web/News/Articles/National/UGI-20230224.aspx</p>
Political leadership	<ul style="list-style-type: none">● Clear and long-term leadership and investment needed, based on solid understanding of the issues and a positive VISION (refer above).● Support policy that addresses issues, based on data, not based on politics. Despite trees being a low priority for many, it does not make the problems go away.● We can improve on housing and trees at same time – stop pitting one against the other.



Theme	Key points
	<ul style="list-style-type: none"> ● Tree protection & incentive mechanisms for retention of trees on private land is critical, especially given a 30% tree canopy target is not achievable on public land only. ● Broaden to a statewide strategy not just Perth/Peel. Regional towns have similar issues. ● No further urban development (re-zoning) into areas of biodiversity value which worsens the South West Biodiversity Hotspot.
Government / Organisation	<ul style="list-style-type: none"> ● New State-wide Lead Agency to be established (with cross department influence to coordinate greening activities). e.g. Green Adelaide. <ul style="list-style-type: none"> ○ Agency to employ broad range of expertise to address the issues. ○ Establish a framework for integration and maximising co-benefits linked to, for example; State carbon reduction strategies, Biodiversity policies and Infrastructure WA. ● New Government Landscape Architect role in DPLH required to advocate across government and work with new agency. ● Strategy to be guided via Industry Working Group and dedicated / experienced teams across multiple expertise.
Policy / Strategy settings	<ul style="list-style-type: none"> ● Elevate Green Infrastructure as an Asset Class – Refer UGI link above. Coordinate with Infrastructure WA to maximise co-benefits. ● Set a 30% target by 2040. This will entail more specific metrics and targets for different LGAs. Targets to also consider: <ul style="list-style-type: none"> ○ Green cover targets (at ground plane) ○ Setting measurable and time-based targets for specific areas – to measure progress. ○ Net Gain is preferred over No Net Loss. ○ Other lead/lag metrics to be identified (e.g. Biodiversity Net Gain, Species Diversity, Vigour/health, Equitable Distribution etc). ● Establish a State-wide Code of Practice for Tree Protection on Public Land (above MRWA Act). ● Establish a suite of Guidelines and Standards that provide roadmaps/ implementation and technical detail for delivery of UGI and Urban Forest Strategies (UFS), and ensure alignment with relevant Engineering, Arboricultural and applicable technical bodies. ● Provide a framework for integrating Green Infrastructure into broader policy frameworks, such as urban planning and climate



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	<p>adaptation strategies, to ensure alignment of objectives and maximise co-benefits.</p> <ul style="list-style-type: none"> • Minimum requirements for provision of trees in Design WA suite specifically in new subdivisions i.e Neighbourhood Design (Liveable Neighbourhoods). • Change the MRWA Legislation to require replacement of trees at a ratio of 2 to 1 when trees are removed. MRWA is responsible for a significant loss of tree canopy. • Ensure engagement with Traditional Owners, incorporating Design with Country principles in the strategy. • Scaleable policy required - Regional, Local and Single Lot as well as Public, Private • Elevate portions of the strategy to policy or legislation e.g. Tree Protections to secure outcomes. • Selection of the right trees to ensure biodiversity – Refer Research. • Coordinate planning of DoT Long Term Cycle Network (LTCN) to maximise multiple benefits / Align 'Green Routes' in Active Transport Planning. • Establish whole of Government Goal of: No net loss of biodiversity and canopy
<p>Agency and Local Government Collaboration</p>	<ul style="list-style-type: none"> • Multi-Agency Collaboration required. <ul style="list-style-type: none"> ○ Water & Environment ○ Public Health & Mental Health ○ Transport ○ Planning & Infrastructure etc • Work with utilities to prioritise, protect and deliver tree canopy and biodiversity outcomes – particularly in streets and infrastructure corridors. <ul style="list-style-type: none"> ○ Sustainable water & drainage management coordinated with Urban Green Infrastructure (UGI) strategy ○ Speed up investment into undergrounding of power to liberate future tree canopy. • LGA's to have an Urban Forest Plan or Greening Plan that is monitored / tracked at State level and aligned with State Guidance. • LGAs to align with overarching tree canopy targets (for public land) and develop strategies to deliver outcomes. • Explore opportunity for a funded UGI program to be piloted via a demonstration project with an LGA. • Fund and support via LGA's, 'Adopt a Verge' programs (or similar) to improve biodiversity outcomes through planting of native plants.



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Technical / Data Mapping	<ul style="list-style-type: none"> ● Data/Monitoring of Urban Canopy should be best practice, high quality and more readily available to public and consistent (quality, methodology and acquisition frequency). <ul style="list-style-type: none"> ○ Monitoring & data collection should align with use and needs (i.e. supports SMART metrics). ○ Provide Open-source accessibility of data and up-to-date dashboards. ● Identify data gaps / monitoring being developed under “Research / New Knowledge” ● New trees require 5,000L/tree/year to establish. Water capacity planning & delivery to be integrated into strategy.
Community and Awareness	<ul style="list-style-type: none"> ● Communication strategy for range of stakeholders that aims to build awareness/ commitment to green infrastructure and UGI. ● Education campaign addressing key issues such as; Urban Heat Island Effect (UHIE), Biodiversity Hotspot significance, Value of trees, Risk management, Cultural knowledge etc <ul style="list-style-type: none"> ○ Develop education material ○ Develop guidance documentation ● Promote community support mechanisms for retention of trees – Refer Finance and Funding. ● Explore opportunities for co-governance of UGI with communities.
Research / New Knowledge	<ul style="list-style-type: none"> ● Priority research topics identified and appropriately funded. <ul style="list-style-type: none"> ○ Valuation of UGI – Refer Funding ○ Data Collection, sharing and publishing ○ Canopy Targets ○ Indigenous Knowledge ○ Public Awareness and Attitudes ○ Planting & Maintenance Approaches ○ Design & Planning Considerations <ul style="list-style-type: none"> ▪ Research suitable tree species that meet multiple criteria within a future context of climate change. ▪ Technical / Arboricultural etc ● Coordinated approach by research bodies including timely dissemination of findings. ● Citizen science opportunities.
Funding & Financial Mechanisms	<ul style="list-style-type: none"> ● \$100’s of millions needed over next 10 years for Green Infrastructure investment. Funding to be allocated. ● Secure & develop long-term funding programs, in particular to address seedling quality & supply issues which require long lead times, as well as for ongoing maintenance to ensure success.



Theme	Key points
	<ul style="list-style-type: none"> • Develop a State funded Incentive Mechanism for trees on private property - Refer Appendix for more information • Quantification of value of UGI in dollar terms: <ul style="list-style-type: none"> ○ Put a dollar value on the existing UGI network using, for example, the Burnley Method – refer Research. ○ Assess increase property values in relation to UGI ○ Co-Benefits of UGI through improved health <ul style="list-style-type: none"> ▪ Air purification ▪ Reduced heat etc ○ Energy Savings of UGI • Explore the EPBC Nature Repair Market. • Explore Natural Capital Accounting Frameworks.
Further Reading / Appendix	Attached please refer: <ul style="list-style-type: none"> • State Funded Incentive Mechanism for Trees on Private Lots

Appendix:

Australian Institute of Landscape Architects Proposed State Funded Incentive Mechanism for Trees on Private Lots

Current incentive-based approaches for establishing and maintaining trees on private land in Australia are very limited compared to more innovative international approaches primarily within US and Europe. Current Australian approaches for incentivising tree establishment and maintenance on private land are largely minor direct incentives such as free tree programs, education, and information campaigns, and ‘negative incentives’ in the form of tree bonds and tree compensation.

Existing positive financial incentive mechanisms such as Community Service Obligations (CSO’s) for Government Trading Enterprises (GTE’s) already provide rebates to consumers in the WA context. This could easily be adapted to encourage tree canopy cover preservation and growth in the metropolitan context. For example; A rebate could be provided through Synergy or WaterCorp, when tree canopy cover threshold is achieved and is retained over a set period of time at the lot level.

Furthermore, DPLH has established SpatialWA (4D infrastructure mapping) which may act as an efficient auditing and compliance tool in which to assess and approve any rebate. Tree canopy cover measurement at the lot level is now available.

This positive (non-punitive) incentive mechanism provides a consistent level of funding and auditing across the state and removes the pressure for LGAs to adopt their own independent funding / incentive strategies associated with private land.

Much of the funding required to implement the above scheme would be accessed through the proceeds of State-issued Green Bonds (GSS).



Advantages are:

- Doesn't impede development – non-punitive / opt in
- State Government 'Investing in Green Infrastructure delivery'
- Engages directly with private landowners
- Assists in cost-of-living pressure – \$\$ rebate
- Can target canopy growth where needed – scheme could be rolled out to heat island areas, areas of low canopy, etc
- Cost reduction to State Gov/LGA – maintenance assumed by landowner
- No need for complicated or complex messaging – climate change, biodiversity, heat island effect, etc

Details of Potential Scheme:

- Goal: Achieving on-lot, private residential tree planting through positive financial incentives
- Method: Rebate provided with a Community Service Obligation (CSO) through a Government Trading Enterprise (GTE) i.e. WaterCorp or Synergy
- Funding: Through Western Australian Treasury Corporations' (WATC's) net proceeds equivalence allocation raised by GSS bonds.
- Compliance: SpatialWA
- Approvals: Climate Action and Environment POG
- Management: Oversight = Sustainability Bond Working Group (SBWG)
- Management/Rollout = relative state agencies (DEWR, DPLH or New Agency) directly involved in project delivery and Treasury
- Evaluation Criteria: Adopt the International Capital Market Association (ICMA) Green Bond Principles (GBP) or Climate Bond Initiative certification.
- Eligibility Window (expenditure): 2027/2028 (proposed)

Next steps:

- Initial coordination with WATC
- Project proposal including; project implementation plan, KPI, risk management, supporting evidence, political impacts, budget including cost of compliance and GSS bond eligibility assessment.
- Review outreach to key demographics effected by the plan's implementation – understanding requirements for uptake of scheme.

Sincerely,

Damien Pericles
Advocacy Chair
Australian Institute of Landscape Architects WA Chapter