

ATTACHMENTS

Ordinary Council Meeting

23 July 2024

Part 1 – 10.3.1

ATTACHMENTS TO AGENDA ITEMS

Ordinary Council Meeting - 23 July 2024

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10.3.1	DRAFT LOCAL PLANNING POLICY - TREE RETENTION (FINAL ADOPTION)	
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Local Planning Policy – Tree Retention

1. Citation

This is a Local Planning Policy prepared under Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015* (the Regulations). This Policy may be cited as Local Planning Policy – Tree Retention.

2. Purpose

To encourage and facilitate the protection of trees and to maintain and enhance tree canopy.

3. Application

This Policy applies to land within the City of South Perth (the City) which is zoned under Local Planning Scheme No.7 (LPS 7) including in the circumstances described below:

- (a) Development applications;
- (b) Subdivision applications;
- (c) Other strategic planning proposals including scheme amendments and structure plans; and
- (d) Any tree damaging activity to a regulated tree.

Tree damaging activity constitutes works under the Regulations and development under the *Planning and Development Act 2005*.

A development application is required for any tree damaging activity to a regulated tree where other works are proposed on a subject site, even if those other works are exempt from development approval under LPS 7 as per Schedule 2, Part 7 Clause 61 of the Regulations.

4. Objectives

- 4.1 Provide a clear definition of a regulated tree and clarify when a development application is required for tree damaging activity.
- 4.2 Prioritise the retention, protection, and the provisions of trees on private land and adjacent reserves in the planning process.
- 4.3 Promote and facilitate tree preservation at the earliest possible stage in the planning and development process, balancing with the desired built form and land use outcomes.

- 4.4 Preserve and enhance neighbourhood amenity, character and sense of place.
- 4.5 Mitigate the urban heat island effect, reduce air pollution, improve groundwater quality and contribute to biodiversity and other environmental benefits.

5. Exemptions

Tree damaging activity requires development approval except in any of the following circumstances: (a) The tree does not satisfy the definition of regulated tree;

- (b) The tree damaging activity is carried out in the course of works in accordance with the Regulations Schedule 2 Part 7 Clause 61(b) item 18:

“works that are urgently necessary for any of the following —

- (i) Public safety;*
- (ii) The safety or security of plant or equipment;*
- (iii) The maintenance of essential services; or*
- (iv) The protection of the environment.”;*

- (c) The tree damaging activity is required as part of an approved Bushfire Management Plan;
- (d) The tree damaging activity is maintenance pruning;
- (e) Tree damaging activity to a species contained on a State or local weed register or a palm tree;
- (f) The tree damaging activity is a public work.

6. General requirements

- 6.1 Where tree damaging activity is proposed to a regulated tree the following will be given due regard in the assessment process:

- (a) Health, maturity, species, and location of the tree;
- (b) Ecological, biodiversity and environmental values of the tree;
- (c) Contribution of the tree to the streetscape;
- (d) The preservation of any other regulated tree on the subject site;
- (e) The location of the tree within the development site and capacity for a modified building design or subdivision to maximise tree retention;

- (f) Any existing development on the site;
- (g) Design and location of proposed crossovers to retain trees;
- (h) Topography and the potential impact from excavation/fill;
- (i) Possible safety risks due to tree limb failure and infrastructure and/or structural damage associated with the retaining the tree;
- (j) Tree Protection Zone(s) (as per *Australian Standard 4970-2009 – Protection of Trees on Development Sites*);
- (k) Tree replacement and/or planting proposed;
- (l) Recommendations of an Arborist Report;
- (m) The objectives of this Policy.

6.2 The following justifications for tree damaging activity to a regulated tree will not be supported:

- (i) Impact on views;
- (ii) The tree variety is disliked;
- (iii) The tree variety causes nuisance by way of leaf, fruit or bark shedding or the like;
- (iv) The tree impacts on private gardens, solar installations, swimming pools or the like; or
- (v) Allergies.

7. Development applications

7.1 There is a general presumption against tree damaging activity (other than maintenance pruning) to any regulated tree and the siting and design of the development should, where possible, avoid impacting any regulated tree.

7.2 Tree damaging activity to a regulated tree may be considered if the following relevant information and/or technical reports are provided to demonstrate:

- (a) The regulated tree is unhealthy, based on the recommendations of an Arborist report;
- (b) The regulated tree causes safety risks to people, infrastructure or buildings based on recommendations on an Arborist report and/or Structural Engineering Report;

- (c) In the opinion of the City, the redesign of the development to accommodate the regulated tree is unfeasible.

8. Subdivision applications

- 8.1 The City may recommend that prior to the determination of an application for subdivision approval, additional information be provided to the Western Australian Planning Commission to allow consideration of the impacts of the subdivision design and layout on any regulated tree, and whether the general requirements of this Policy have been addressed.
- 8.2 Subdivision design, layout and earth working levels, including the positioning of public open space, configuration of the public road network, lot design and densities, shall prioritise the retention of regulated trees.
- 8.3 The subdivision plan shall identify regulated trees and note if they are to be retained or removed, and the applicant is to demonstrate how the retained regulated trees will be protected as part of the subdivision process.

9. Strategic planning proposals

- 9.1 Where applicable, Local Planning Scheme amendments and Structure Plan proposals should identify regulated trees and shall outline mechanisms and measures to protect regulated trees at subsequent stages of the planning process.
- 9.2 Concept Plans supporting Local Planning Scheme amendment applications and Structure Plans shall prioritise positioning of public open space, configuration of the public road network and lot design and densities to retain regulated trees.
- 9.3 Strategic planning proposals shall be supported by technical information and reports which demonstrate that the protection of regulated trees has been prioritised.

10. Definitions

Arborist Report: *means a report which is prepared by a suitably qualified and experienced arboriculturist with a minimum qualification of Diploma of Horticulture (Arboriculture) Australian Qualification Framework (AQF 5) or equivalent, and with demonstrated experience in high level tree assessment and diagnosis.*

Maintenance Pruning: *means pruning that:*

- (a) *involves removing dead or diseased wood only;*
- (b) *is the first pruning of the tree in the calendar year and affects less than 10% of the canopy, not altering the overall shape of the canopy; or*

- (c) is of a fruit tree and done for fruit production; or*
- (d) does not include removing limbs with a diameter of 100mm or more; or*
- (e) is otherwise minor maintenance or thinning of the crown that does not adversely affect the health or general appearance of the tree; and*
- (f) is undertaken in accordance with the standard for Pruning Amenity Trees Australian Standard 4373-2007 – Pruning of Amenity Trees.*

Public work: *has the same definition as contained within the Planning and Development Act 2005.*

Regulated tree: *means a living tree that:*

- (a) Is 8.0m or more high; and/or*
- (b) has an average canopy diameter of at least 6.0m; and/or*
- (c) has a trunk circumference of at least 1.5m, measured 1.4m above the ground; and*
- (d) is of a species that is not included on State or local area weed register.*

Tree-damaging activity: *means:*

- (a) the killing or destruction of a tree; and/or*
- (b) the removal of a tree; and/or*
- (c) the severing of branches, limbs, stems or trunk of a tree; and/or*
- (d) the ringbarking, topping or lopping of a tree; and/or*
- (e) any other substantial damage to a tree.*

11. Relevant Legislation, Policies, Documents

Planning and Development Act 2005

Planning and Development (Local Planning Schemes) Regulations 2015

State Planning Policy 7.3 – Residential Design Codes

City of South Perth Local Planning Scheme No.7

City of South Perth Local Planning Policies

Australian Standards AS 4970—2009 - Protection of trees on development sites

Australian Standards AS 4373-2007 Pruning of Amenity Trees

12. Document Control

Adoption date	OCM xx
Date Modified	xxx
Strategic Community Plan Reference	Economy Environment (Built and Natural)

**Draft Local Planning Policy – Tree Retention
Schedule of Submissions**

1	11 Waverley Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
1.1 Oppose.	Noted.
Please tell us why.	
1.2 Private is private?	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
1.3 No.	Noted.

2	14 Abjornson Street Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
2.1 Support.	Noted.
Please tell us why.	
2.2 We need old growth trees for so many reasons! Ground integrity, oxygen production, carbon dioxide absorption, soil salinity issues, habitat for native wildlife, ambience, land value & general health benefits. We need more trees... not less! This means trees must be retained where possible, preserved where possible and monitored.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
2.3 We need more trees NOT less! Without trees we have no oxygen and without oxygen we have no life on this planet. They current trees need to be preserved where possible and MORE trees planted!	Noted.

3	87 Angelo Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
3.1 Oppose.	Noted.
Please tell us why.	
3.2 I don't agree with the motion that a private property owner should be forced to keep a tree on their own land. If this rule comes into existence, then the council should be forced to pay all the private landowners land-rent for the trees that the Council is forcing them to keep. I paid a fortune for my land and it's mine and I should have the right to govern my own land.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report. The City is not proposing to lease/ rent land from private property owners of regulated trees.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
3.3 I support more trees on public land - parks, verges, streets.	Noted.

4	PO Box 6271 Bunbury
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
4.1 Support	Noted.
Please tell us why.	
4.2 The City of South Perth should plant as many trees as possible on public land. However, given that 80% of Perth's tree loss occurs on private property, this alone will not be sufficient. Without regulated protection for trees on private land, we will fast end up with a city that is not liveable.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
4.3 The draft Local Planning Policy is sound and needs to be implemented throughout WA, not just in South Perth. I congratulate you on leading the way in this space.	Noted.

5	46a King Edward Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
5.1 Support	Noted.
Please tell us why.	
5.2 There is a glorious tree on a property near me and I worry they will cut it down at some point as many home in the street have been redeveloped.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
5.3 Nil	Noted.

6	41 McDonald Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
6.1 Support	Noted.
Please tell us why.	
6.2 Preservation of trees in private and public land is crucial to environmental and social wellbeing. Removal of trees must not be a personal choice. Preservation and planting of trees is a climate imperative.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
6.3 I would support increasing the number of street trees and compel residents with space available to plant more trees.	Noted, however, this Policy does not relate to trees on public land. Street trees are a separate matter.

7	77/10 Roebuck Drive Salter Point
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
7.1 Support	Noted.
Please tell us why.	
7.2 I had many fruit trees around my property in Edgecumbe Street, my neighbour said our home was quite a bit cooler than their home without trees. Same home.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
7.3 Seeing trees pulled out for new concrete homes going to boundaries shouldn't be allowed. It makes our suburb hotter and uses more power for Airconditioning, etc.	Noted.

8	47 Gladstone Avenue South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
8.1 Oppose	Noted.
Please tell us why.	
8.2 This could severely limit people's ability to develop their properties, especially without incurring further expenses. They are on private property and should therefore be treated as their property.	Noted. Refer to 'Impinging on Private Property Rights' and 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report. Should Council adopt the Policy, it is recommended that Council waive fees associated with applications for development approval for tree damaging activity to a regulated tree.
8.3 Concentrate on trees on common land, verges and limit trees being removed for new buildings rather than those that have been "owned" by property owners for many many years. They may not have spent huge amounts of money on their property if they knew this policy would be introduced.	Noted. Refer to 'Planting on public land' within the consultation section of the report. This approach requires retention of mature trees regardless of whether an entire site is being redeveloped.
8.4 It could also affect the ability to sell homes if buyers are aware this policy exists. And in case you are wondering, my property	Increase or decrease in property values is not a material planning consideration.

has no trees that could be affected by this policy, either now or in the future.	In respect to individual lots, established trees in situ often equate with larger lot sizes or are considered a feature of the property, which can increase the value of the property. In any instance, the City can consider the location of the tree on the site and would take a pragmatic approach to retention where the tree would otherwise prevent the site being developed.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
8.5 Nil	Noted.

9	128 River Way Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
9.1 Oppose	Noted.
Please tell us why.	
9.2 The council should not interfere with private property regarding trees. This is beyond your scope.	Noted. Refer to ‘Role of Council in regulating land’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
9.3 Nil	Noted.

10	1 Dungarvan Court Waterford
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
10.1 Oppose	Noted.
Please tell us why.	
10.2 I believe that residents should be able to choose what trees they would like to have or remove on their property.	Noted. The Policy does not restrict which trees can be planted, however, if adopted it would require development approval prior to removal of a regulated tree.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

10.3 Nil	Noted.
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11	87 Robert Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
11.1 Support	Noted.
Please tell us why.	
11.2 Retention of tree canopy for good of the climate, home for birds etc	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
11.3 With high rises going up, we are losing the trees and South Perth is therefore losing some of its character.	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.

12	58 Roseberry Avenue South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
12.1 No Answer.	Noted.
Please tell us why.	
12.2 I understand there are some trees that need to be removed, however, can the trees that are deemed in the removal category, be removed from our private property, without any discussion with the owner/s of the property?	No - the intent of the Policy is not to enable the City to remove trees on private property. The landowner would be required to consent to a development application being made to remove a regulated tree.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
12.3 Does this include only the verges, or the whole area of the property? Can these questions be answered please? I have provided my email below. Many thanks.	The Policy applies to zoned land under Local Planning Scheme No. 7 (predominantly private property). Reserved land is typically managed by State or local government. Road reserves (verges) are managed by the City or Main Roads Western Australia.

13	1A, 8 Parker Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
13.1 Oppose	Noted.
Please tell us why.	
13.2 The owners of any property should have full rights to remove a tree if they so wish. It should not be the ideals of another person or party to dictate what happens on an owners property. Trees can be replaced.	Noted. Refer to ‘Impinging on Private Property Rights’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
13.3 Nil	Noted.

14	11 King Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
14.1 Oppose	Noted.
Please tell us why.	
14.2 Neighbours have massive trees on the boundaries of properties in South Perth Region that impact the lives of the surrounding neighbours and should not be protected by governments at all. Trees should be planted in the correct place and the correct tree size should be chosen for each location.	Whilst the City agrees that new tree planting should consider the species and appropriate location, the draft Policy is seeking to protect existing mature canopy trees, which may have already been planted on property boundaries. In considering whether to support pruning/ removal of a regulated tree, the City has included the recommendations of an arborist/ structural engineers report as criteria. The City can consider this information for trees on the boundary that may otherwise result in a safety risk/ damage to neighbouring properties.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

14.3	Planners have way too much power in Local Government and need their powers actually reduced.	Noted. Refer to 'Role of Council in regulating land' within the Consultation section of the report.
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15	140 River Way Salter Point	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
15.1	Oppose	Noted.
Please tell us why.		
15.2	I think that criteria b) "has an average canopy diameter of at least 6.0m" is too small and will capture what I can best describe as "Skinny trees with long arms (branches)". I suggest the diameter of 10.0m as a more appropriate measure.	The tree size was chosen to align with the medium tree size contained within the Residential Design Codes, being 6.0-9.0m for canopy diameter and 8.0-12.0m for tree height.
15.3	Approval by using the existing "Development Approval" process is too onerous and is akin to using a sledgehammer to crack a Walnut. This existing process may be convenient to the City of South Perth, but rate-payers and their developers will be burdened with the costs and delays associated with Development Approvals.	The maximum fee for determining a development application (other than for an extractive industry) where the development has not commenced or been carried out and the estimated cost of the development is not more than \$50,000 is \$147. Should Council adopt the Policy, it is recommended this fee be waived. The statutory timeframe for determining a development application where no advertising is required is 60 days.
15.4	Come on, you can do so much better. Simplify and streamline the process! Most applications will be for a SINGLE tree!!! We don't need anymore (Green)Red -Tape.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
15.5	Nil	Noted.

16	19B Canavan Crescent Manning	
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
16.1 Support	Noted.
Please tell us why.	
16.2 Supports wildlife, keeps our suburbs cool, natural amenity and improves privacy in our suburbs which are being increasingly dense.	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
16.3 Height should be amended from 8m to 6m. New builds make allocation for a tree, however nobody goes and actually enforces/confirms compliance once the build is complete. In the context of new builds demolishing an existing tree, there should be more protection of our large trees. Possibly a fine or cost to remove would deter just flattening the block. This is especially relevant where R30 re zoning and above has occurred and there no canopy is being retained.	Noted. The height was chosen to reflect the Residential Design Codes, which currently provides a medium sized tree being 8.0m – 12.0m tree height.

17	22 Perth Street Cottesloe
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
17.1 Support	Noted.
Please tell us why.	
17.2 We need to retain existing mature trees to reach the recognised target of 30% tree canopy by 2040, to mitigate rising urban temperatures.	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
17.3 Acceptance of tree protection policy will pave the way for all of Perth LGAs to	Noted.

follow. Please implement the policy as a matter of urgency.	
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18	1 Henley Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
18.1 Neutral.	Noted.
Please tell us why.	
18.2 If the tree is damaging the area with its root system then it should be removed. Also if there is damage to the branches or trunk the tree should be removed for safety sake.	Noted. Refer to ‘Liability and Safety issues’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
18.3 Nil	Noted.

19	156 Douglas Avenue Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
19.1 Support.	Noted.
Please tell us why.	
19.2 It’s vital to protect local wildlife retain their food sources keep temperatures down in our area maintain biodiversity. There is no downside this is necessary	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
19.3 Nil	Noted.

20	34B Bickley Crescent Manning
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
20.1 Oppose	Noted.
Please tell us why.	
20.2 The draft policy is local government overreach. There ought to be as limited regulation as possible on citizens' private property. If a property owner wants to prune or remove a tree on their private land for any reason, that is solely a decision for the property owner and has nothing at all to do with other residents or the local government. If a property owner wants to prune the portion of a neighbour's tree that is encroaching/overhanging onto their private land, they should not require local government approval to do so.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
20.3 Nil	Noted.

21	52A Griffin Crescent Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
21.1 Oppose	Noted.
Please tell us why.	
21.2 Trees on peoples private property should be able to be governed by the property owner.	Noted. Refer to 'Role of Council in regulating land' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
21.3 Delete it. I support a green neighbourhood but this country has too much Government intervention.	Noted.

22	9 Campbell Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
22.1 Support	Noted.
Please tell us why.	
22.2 We need to keep as many trees as possible on private and public land. They are natures air conditioners!	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
22.3 Don't enforce this to the level that someone wanting to build a house cannot do so or needs to completely redesign the home round tress. Needs common sense and not too much red tape.	Noted. Refer to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report.
22.4 Also when a tree does have to be removed it should not simply be wood chipped but slabbed and used to make furniture, buildings, art. Trees are also a resource so lets at least use them. How about a tree slabbing and drying operation at recycling station on Thelma Street. Como. Timber to be given/sold to Mens Sheds, furniture makers, self builders etc.	Noted, however, this is outside the scope of the Policy/ control of the City.

23	6 Welwyn Avenue Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
23.1 Support	Noted.
Please tell us why.	
23.2 Perth has the smallest tree canopy of all capital cities in Australia. Western Australia is predominantly a desert. Our trees, whether public or private,	Noted.

need to be regulated for future generations.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
23.3 Nil	Noted.

24	81a Hope Avenue Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
24.1 Support	Noted.
Please tell us why.	
24.2 Support tree providing it is One Metre away of Side Boundary Fence and 3 metres away from Front Building so that the Roots don't cause damage to the Building. Many residents are planting trees on the side boundary within a few centimetres of the side Fence Boundary and this then causes havoc later on. Many residents don't consider their neighbours when planting trees.	Noted, however, this is outside of the scope of the Policy which seeks to retain trees that meet the definition of a regulated tree. The Policy does not address planting requirements, which are otherwise provided by the Residential Design Codes.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
24.3 New Trees should not be permitted to be planted closer than One Metre of Side Boundary Fence and Two Metres of Rear Boundary Fence.	Noted, however, this is outside of the scope of the Policy.

25	6/158 Broadway Crawley
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
25.1 Support	Noted.
Please tell us why.	

25.2	We need to keep, or plant, as many trees as possible to mitigate climate change and increasing temperatures.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
25.3	Nil	Noted.

26	27 Coolidge Street Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
26.1	Oppose	Noted.
Please tell us why.		
26.2	We have 5 trees on our property which are all above 8m height. We have them lopped approximately every seven years to keep them from suffering wind damage or from limb breaking off because of excess length. No doubt development approval applications will cost me money. If they are not lopped who will bear any third-party liability for damage subsequently caused by the trees.	Should Council adopt the Policy, it is recommended that Council waive fees associated with applications for development approval for tree damaging activity to a regulated tree. In respect to liability, refer to 'Liability and Safety issues' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
26.3	As I have said we have 5 trees on our property, we support more trees in the area, but stopping infill development site clearance would be a better approach than encumbering residents.	Noted.

27	1 Harper Terrace South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
27.1	Support	Noted.
Please tell us why.		

27.2	Trees need to be retained wherever possible, especially large ones, for the health of the community.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
27.3	Nil	Noted.

28	82 Welwyn Avenue Salter Point	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
28.1	Support	Noted.
Please tell us why.		
28.2	We desperately need to protect trees. The most obvious reason is climate change mitigation and carbon sequestration, but also because tree canopy makes for a cooler, and more attractive landscape in our suburbs. This policy is absolutely essential.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
28.3	Only that even more should be done to protect all trees and to plant more trees.	Noted.

29	48 Onslow Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
29.1	Support	Noted.
Please tell us why.		
29.2	Council and government need to do more to protect and increase the tree canopy. The number of mature trees I've seen developers remove is concerning.	Noted.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
29.3	I think more needs to be done to protect smaller trees too.	Noted. The Policy seeks to retain trees with a mature canopy in the first instance, which are generally medium-large sized trees.

30	32 Bland Street Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
30.1	Oppose	Noted.
Please tell us why.		
30.2	I live in Como and there are massive trees in my neighbours gardens which are almost 70 years old. They overhang the roof of my property- I have asked neighbours to trim the overhang - one is cooperative but one says this is too costly and the tree is of sentimental value. I am very concerned about damage to the roof of my property from the old overhanging branches and foliage.	Noted. Refer to ‘Liability and Safety issues’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
30.3	I like trees and am not against them! I believe however that trees in private properties should be managed accordingly and safely! I pay for expensive gutter and roof clearance twice a year, due to the leaves from trees which are not mine.	Noted. Refer to ‘Liability and Safety issues’ within the Consultation section of the report.

31	5/43 Anstey Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
31.1	Oppose	Noted.
Please tell us why.		

31.2	Hi, I am concerned that where there is a genuine need such as a neighbour's tree damaging another person's property, such as fences, paving, etc. that the tree owner will be discouraged from taking proper, well needed action. It will also be a barrier for the impacted people, especially those people who are more vulnerable, in gaining corrective action from difficult and uncooperative neighbours.	Noted. Refer to 'Liability and Safety issues' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
31.3	Is there another way, perhaps a fee free permit that could be submitted by tree loppers? rather than a development application by tree owners?	The implication of requiring a development application provides a statutory mechanism for the protection of trees (i.e. the enforcement provisions of the <i>Planning and Development Act 2005</i> would be available for non-compliance with the Policy).

32	15 Conochie Crescent Manning	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
32.1	Support	Noted.
Please tell us why.		
32.2	Tree cover needed more than ever.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
32.3	The criteria do not allow consideration of trees such as Pencil pines and the like.	Noted. Whilst pencil pines have environmental value, the Policy seeks to retain trees that provide mature canopy in the first instance.

33	39 Karoo Street South Perth
Comment	
Summary of Submission	
Comment	
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

33.1	Neutral.	Noted.
Please tell us why.		
33.2	Objectives could be expanded to include activities to replace trees where 'damaged' and there is no reference to canopy target. It appears to err on the side of development and not preserve or enhance tree canopy. Mature trees, which have taken decades to grow are removed for development (in fill) and invariably there is no replacement nor requirement to replace. Should be included in planning approvals. The COSP is turning into a concrete jungle and will gradually Is there another policy about increasing tree canopy, if so this should be referenced. If not inclusion should be considered.	Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets which may otherwise be preferred by landowners/ developers over retaining vegetation (i.e. development led design compared to tree retention led design). Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
33.3	What reporting and evaluation of the policy will be undertaken, specifically the net effect to the tree canopy for the local government area following implementation of the policy?	Should the Policy be adopted, removal of regulated trees will require development approval. The City records all development determinations, which can be used for monitoring and evaluation purposes in respect to the impact on the overall tree canopy across the district.

34	Level One 27 South Perth Esplanade South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
34.1	Oppose.	Noted.
Please tell us why.		
34.2	What right does a council have telling someone they can't cut a tree down on their own property especially if that person has bought the block to renovate or build a new house. Will council compensate for modification of plans etc. I think not. SPCC is being	Noted. Refer to the 'Role of Council in regulating land' and 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report.

	bullied by tree huggers who will never be affected by the new laws. The state is desperately trying to build accommodation for increased densities and this is another deterrent. It's not as if these people won't grow other trees, it's obvious that if a tree is smack dead in the middle of the block it's going to stop the development or increase the costs of the new development.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
34.3	I would ask that council and councillors show some integrity and not be cajoled by tree huggers and their disingenuous claims.	Noted.

35	10 Collins Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
35.1	Support	Noted.
Please tell us why.		
35.2	We need to preserve (and expand) our urban tree canopy.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
35.3	Nil	Noted.

36	24 Hobbs Avenue Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
36.1	Neutral	Noted.
Please tell us why.		
36.2	Many trees that are not suitable have been planted as street trees [e.g. Qld.	Noted. The City is considering principles for determining appropriate tree species which

	Box trees which produce almost round nuts which fall on the paths and create a real falling hazard for pedestrians] or as play-ground or park-land shade trees [flood-gums which shed limbs and fig trees which shed sticky goo!] would like to see a policy implemented to gradually replace all these types of trees with better, more suitable trees that are more fit for purpose.	will be part of public consultation on the future Urban Greening Strategy.
36.3	Trees on private land should be maintained or removed at the discretion of the land-owner and government authorities should encourage retention and new plantings with advice, free trees and respect for private holdings! There should be no compulsion to retain any tree, especially ones causing allergies or roof / gutter or other problems [e.g. Shade over solar panels or prevention of winter-sun entering and warming a room in someone's house!	Noted. Refer to 'Impinging on Private Property Rights' and 'Role of Council in regulating land' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
36.4	I think that there are MANY OPPORTUNITIES for trees to be planted on PUBLIC AREAS including in BITUMINISED-CAR-PARKS and along the RIVER-FORESHORE and ROAD VERGES and IN ALL THE WATER SUMPS should be turned into USEABLE PARKLAND [by plantings and wooden decks and rocks and which would enhance their appearance and utility while still allowing them to perform their intended function ! Nobody sits in a park in the rain....and the sump will soon drain anyway !] But people DO sit in the shade in Summer beneath UNSUITABLE FLOOD-GUMS which may well shed limbs and injure them ! If the COUNCIL ADOPTED a whole NEW RANGE OF STREET TREES I am sure that the public would enthusiastically support the move [by volunteering to plant them and by watering them to help get them established !]	Noted. See comment above and refer to 'Planting on public land' within the consultation section of the report.

37	31 Woodsome Street Mount Lawley
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
37.1 Support	Noted.
Please tell us why.	
37.2 Because it is important to protect these trees.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
37.3 Nil	Noted.

38	3/4 Comer Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
38.1 Support	Noted.
Please tell us why.	
38.2 South Perth owes a lot of its beauty to the trees. I am a firm believer in the aesthetics and the cooling affects provided by them. They are vital in providing some sort of habitat for our wildlife that surrounds our area.	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
38.3 I agree, and hope that removal of trees for allergies will be extremely regulated, And as a pure scientifically proven decision for the tree.	Noted.

39	8 Allen Street South Perth
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
39.1 Oppose	Noted.
Please tell us why.	
39.2 Land owners should be permitted to do as they wish with their own land. If the city wishes to dictate, buy the land yourself.	Noted. Refer to ‘Role of Council in regulating land’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
39.3 Stop trying to appeal to minority groups.	Noted.

40	36 Dundas Road Inglewood
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
40.1 Support	Noted.
Please tell us why.	
40.2 It is vital for our health to increase urban tree canopy to try to offset the negative impact of climate change. 80% of Perth tree loss is in private property. Healthy established trees are a precious asset for the entire community and we cannot afford to lose any. Perth has already the lowest tree canopy rate among Australian capitals.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
40.3 Nil	Noted.

41	10 High Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

41.1	Support	Noted.
Please tell us why.		
41.2	Too much mature canopy has been lost. There should be the opportunity to assess before trees are removed. Particularly if they are on the boundary and can complement owners amenity. In particular developers should understand the value added when they incorporate mature trees into their plans.	Noted. Refer to 'Benefits of tree retention' within the consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
41.3	My concern is developers will include the fines for damaging and removing trees into their costings and margins. It won't protect the trees. There is also recent evidence in Hopetoun St South Perth, where the developer claimed that the trees were 'sick' and swiftly moved to prune them inappropriately, and then remove them as they were being registered. I fear this behaviour will not be deterred.	Noted. Irrespective of any liability that may arise to landowners where compliance with the Policy has not been achieved, other entities (builders and contractors) are also required to ensure that any development carried out by them is lawful. The City would undertake enforcement action against these parties, who would be responsible for such costs if a prosecution was successful. The maximum penalties under the <i>Planning and Development Act 2005</i> are significant and are currently \$200,000 in the case of a natural person and \$1,000,000 in the case of a body corporate, with the potential for additional daily penalties in the case of ongoing non-compliance. The extent of penalties likely a suitable deterrent to tree removal.

42	46 Anstey Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
42.1	Support	Noted.
Please tell us why.		
42.2	There's no need for trees to be lost during development and every tree that can be saved should be saved to protect our health and environment.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

42.3	Bring it!	Noted.
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43	Hawkstone Street Cottesloe	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
43.1	Support	Noted.
Please tell us why.		
43.2	WA has the lowest tree canopy of all states, and is one of the hottest! With temperatures rising, trees will be needed for their cooling and shading effect. This LPP will reflect the enormous value of South Perth's remaining trees.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
43.3	I commend South Perth council for bringing their tree policies into line with other councils as a step toward greater tree protection and canopy preservation. I regularly visit South Perth and on a recent visit in late May, it was so hot on the grass foreshore that all visitors had to huddle under the ferry terminal, and in fact were prompted to leave back to the city early as they couldn't get comfortable out of the heat. A selection of shady trees would have made the difference. This was late May - and the temperatures are only forecast to get hotter. This LPP is excellent future planning by South Perth.	Noted.

44	9 Carr Street South Perth	
Comment		
Summary of Submission		Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
44.1	Support	Noted.
Please tell us why.		
44.2	Trees are necessary for the local environment. Shade, temperature regulators, animal life habitat and improving street scape.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
44.3	I support it fully.	Noted.

45	47A Marsh Avenue South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
45.1	Neutral	Noted.
Please tell us why.		
45.2	What costs would you impose and does logic come into play - a tree in the middle of vacant block etc would of course need to removed if sold as residential land.	Should Council adopt the Policy, it is recommended that Council waive fees associated with applications for development approval for tree damaging activity to a regulated tree.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
45.3	Retention policy should have a minimum land size before it's enforced and safety of buildings needs to be factored in i.e.. risk of tree falling and damaging lives or buildings. Green up the city of south land by enforcing verge trees and approving large developments with adequate green space and protect what green space we have.	Noted, however, the Policy seeks to retain mature canopy trees, which may already be located on subdivided lots. The City can consider applications for pruning as part of the Policy for safety reasons. In considering new development applications, the City assesses applications against the tree planting/ deep soil area requirements of the Residential Design Codes. The City will continue to plant trees on public land.

46	5a Teague Street Burswood	
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
46.1 Support	Noted.
Please tell us why.	
46.2 Trees are beautiful, add value, enhance liveability, purify air, ameliorate microclimate- reduce urban heat island effect, provide habitat, protect buildings from extreme windy weather (help alter terrain category).	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
46.3 Its a welcome initiative. We must protect trees, especially on private land. It’s easy to design around existing trees and they add enormous value to the end result.	Noted.

47	10 Torrens Street Cottesloe
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
47.1 Support	Noted.
Please tell us why.	
47.2 Mature trees, even when on privately owned land, are of benefit to the whole community. Tree canopy helps to make cities liveable, by providing shade that makes spaces cooler and it's also good for our health and mental wellbeing. Tree canopy also contributes to addressing climate change. Data shows that Perth has the least tree canopy of all Australian capital cities, and it is still declining. Therefore mature trees, even when on privately owned land, should not be removed without good reason.	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
47.3	Nil	Noted.

48	30 King Street Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
48.1	Support	Noted.
Please tell us why.		
48.2	Perth has a hot dry climate. Tree retention will help alleviate this by providing shade for smaller plants.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
48.3	Nil	Noted.

49	24A Elizabeth Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
49.1	Support	Noted.
Please tell us why.		
49.2	In addition to the stated objectives, the preservation of the tree canopy throughout the City of South Perth is critical to the visual and aesthetic appeal of the neighbourhood. Retaining an effective tree canopy also ensures there is adequate habitat for a variety of birdlife that also adds to the attraction of the City.	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
49.3	Newer, outer suburbs of Perth do not allow for or have not encouraged the growth of larger trees resulting in a view of roof tops and a lack of natural	Noted.

shade. It is critical for the City of South Perth to preserve the tree canopy including the proposed Regulated Trees as land is redeveloped. To that end, developers and home owners should be encouraged to allow for land to grow larger trees to become the Regulated Trees of the future.	
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50	5 Sandgate Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
50.1 Oppose	Noted.
Please tell us why.	
50.2 Many years ago, I planted a Jacaranda in my front garden. It is beautiful tree but it is large enough to pose a risk to mine and my neighbours properties, if allowed to grow without pruning. I have about one third of the canopy removed every 2 years. If the draft policy is approved, I would no longer be able to maintain the tree to its current size, as the pruning activity would exceed the limits set in the policy. If there was a chance of this Policy being approved as is, I would have to seriously consider removing the tree completely before it came into force.	The Policy does not limit pruning to a certain size (e.g. reducing the size of a tree to the minimum specified size of a regulated tree defining in the Policy), rather, requires development approval prior to pruning activity to a regulated tree occurring. The City would consider the advice of an arborist in respect to the extent of pruning required to ensure the health of the tree is maintained.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
50.3 Although I support the intent behind the policy, it is overly restrictive.	Noted.

51	2A Milton Avenue Balcatta
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
51.1 Support	Noted.
Please tell us why.	
51.2 Trees, especially significant trees, even when on private land benefit us all and should be owned by the community. Perth has an incredibly low canopy cover which has only become worse in the current drought as many tree die off. Trees improve wellbeing, provide habitat, help mitigate the affects of climate change and make an area beautiful. Please do everything you can to retain and increase the protections for trees and other vegetation.	Noted. Refer to ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
51.3 Please make the protection for trees as strong as you possibly can. Strong laws will benefit the South Perth and wider Perth community. Please set the standard here, be progressive, protect trees and set an example for the other councils to follow.	Noted.

52	44 Mackie Street Victoria Park
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
52.1 Support	Noted.
Please tell us why.	
52.2 Need to keep more of the larger old trees to keep the aesthetic of City of South Perth. Can't remove everything for development!	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
52.3 Nil	Noted.

53	16 Airlie Street Claremont
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
53.1 Support	Noted.
Please tell us why.	
53.2 People are often pressured to remove healthy trees because of inconvenience and false fear of damage. It would help if there were regulations that protected them.	Noted.
53.3 The positive impact trees have on our environment is well-researched. From reducing temperature, giving us shade, providing habitat, cleaning the air and benefitting our mental wellbeing. However we are faced with multiple attacks on our tree canopy from developers, disease, and drought, it is therefore essential that we protect the trees we have. Too many developers take the attitude that it is easier to clear a site rather than work with existing trees, private owners often remove trees to simply avoid "mess" or because of misplaced fears of limb fall.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
53.4 Keeping and improving the tree canopy should be a high priority. At a time when we are experiencing record-breaking temperatures it is essential that we do everything we can to mitigate the effect of climate change. A better tree canopy will be better for our health and comforting our pocket.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.
53.5 In some instances it may be beneficial to provide some financial help (In terms of council arborists). There can be considerable expense to maintaining a large tree.	Noted. Whilst \$100,000 was included in the adopted 2024/25 annual budget towards tree mapping and arborists reports to ensure enforcement and technical advice in support of implementation of the Policy if adopted, the arborists reports were intended to be peer

	<p>reviews of reports submitted in support of an application if required.</p> <p>It is not considered appropriate for the City to procure arborists reports on behalf of applicants, as the City must remain independent in its statutory assessment of the subsequent development application, including the arborist report.</p> <p>Notwithstanding, the City has recommended fees associated with development applications be waived in respect to applications for development approval for tree damaging activity to a regulated tree.</p>
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54	7/44 Ranelagh Crescent South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
54.1	Neutral	Noted.
Please tell us why.		
54.2	Human safety at all times outweighs any other consideration! Decision must be made promptly when safety is at stake.	Noted. Refer to 'Liability and Safety issues' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
54.3	Land owners MUST have the majority input & decision making when deciding on these issues.	Noted. Refer to 'Role of Council in regulating land' within the Consultation section of the report.

55	64 Forrest Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
55.1 Support	Noted.
Please tell us why.	

55.2	The retention and continued addition of trees in our community is so important for future generations and also for the aesthetic of the streets.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
55.3	Nil	Noted.

56	39a Godwin Avenue Manning	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
55.1	Support	Noted.
Please tell us why.		
55.2	I fully support the idea of Regulated Trees and protecting important mature trees in the CoSP. I live on a beautiful street with many large mature trees and they create a lot of shade in summer. One of my neighbours already removed a large tree from their property when they built their house, there's a huge gap in the tree coverage now. I'd love to see protections from this happening again.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
55.3	Nil	Noted.

57	23 River View Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
57.1	Oppose	Noted.
Please tell us why.		
57.2	The Council should stop interfering with private property rights. Trees on private property belong to the owner	Noted. Refer to 'Impinging on Private Property Rights' and 'Role of Council in

of the property and the Council should have no right to dictate what an owner does or doesn't do with their property. Unless the Council is willing to bear responsibility and the cost of maintaining privately owned trees, including being prepared to attend on call to prune trees to the owners' requirements, and compensate owners for any loss in value (which may be future development value) as a result of Council policy, it should focus on matters that are already its responsibility.	regulating land' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
57.3 Focus on maintaining and planting verge and other trees, and allowing property owners to develop verge areas to include trees and other vegetation, and contribute to the costs that owners incur in maintaining verge areas.	Noted. Refer to 'Planting on public land' within the Consultation section of the report.

58	Hobbs Avenue Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
58.1 Oppose	Noted.
Please tell us why.	
58.2 Fundamentally the owner of the property has the right to decide which suit their home and lifestyle and whether trees stay, and which tree go. We are not living in a dictatorship of communist country!	Noted. Refer to the 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
58.3 CoSP need to focus on maintaining the street scape and street trees (which are dying due to lack of water). Many saplings have perished due to infrequent watering during the dry	Noted. The watering programme to new trees continues to be successful. Unfortunately, the seriousness of the drought the south-west experienced this summer has affected many trees regardless of the additional water programmes provided.

summer months (see around Collier Park Primary Schools).	
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59	1/49 Birdwood Avenue Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
59.1 Support	Noted.
Please tell us why.	
59.2 Seems a reasonable approach that is not too onerous but conveys the intention. I agree that large trees should be protected.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
59.3 I wonder in certain situations that a tree that has low significant value might be considered for replacement by alternatives that might be greater in number, of a different type and form, provides greater and more diverse habitat and easier management could be considered. In other words consideration for positive environmental improvements as a reason to consider removal or trimming etc. For example replacement of a tree highly susceptible to shot hole borer by a more resistant tree might provide longer term benefit.	Noted. The City did not include offset provisions within the Policy, as the objective of the Policy is to retain trees in the first instance.

60	6 First Avenue Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
60.1 Oppose	Noted.

Please tell us why.	
60.2 What happens if you cut down a tree on your property without DA?	<p>Should Council adopt the draft Policy, the provisions detail that tree damaging activity to a regulated tree (including tree removal) is considered development, and it would therefore become an offence under the <i>Planning and Development Act 2005</i> to undertake such works without having first obtained development approval.</p> <p>The maximum penalties under the <i>Planning and Development Act 2005</i> are significant and are currently \$200,000 in the case of a natural person and \$1,000,000 in the case of a body corporate, with the potential for additional daily penalties in the case of ongoing non-compliance.</p>
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
60.3 I should be able to plant and remove trees on my property without council involvement.	Noted.

61	46 Redmond Street Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
61.1 Support	Noted.
Please tell us why.	
61.2 The value of trees cannot be underestimated especially in Perth where our summers are getting hotter and where our native fauna are at risk, let alone the air quality and science behind the value of trees.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
61.3 I honestly think it is about time that we realised our collective responsibility and stopped being so selfish about 'our property'. We have a number of responsibilities as property owners and so, keeping trees is in line with this	Noted.

thinking. The 'greater good' needs to be taken into consideration.	
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62	8 Hill Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
62.1 Oppose	Noted.
Please tell us why.	
62.2 I am concerned for our safety. Tree branches on the very fall onto pedestrian paths and driveways - they could pose a danger to people walking past and/or cars parked in the street or exiting driveways during storms. The council never clears away the fallen branches and the mess they create and residents are expected to take care of these fallen branches. Senior citizens living on their own don't have the capacity to manage these issues.	Noted. Refer to 'Liability and Safety issues' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
62.3 If the council wants to retain and plant trees, the council should also be responsible for the maintenance and clearing of these trees.	Noted, however, landowners are already responsible for the maintenance of trees on private property. Should Council adopt the Policy, it is recommended that Council waive fees associated with applications for development approval for tree damaging activity to a regulated tree.

63	4/93 Mary Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
63.1 Support	Noted.
Please tell us why.	

63.2	Perth, when compared with other cities in Australia, has less trees, and we need to protect mature trees. The effects of heat, air quality etc is dependent on trees.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
63.3	Nil	Noted.

64	61 Douglas Avenue South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
64.1	Oppose	Noted.
Please tell us why.		
64.2	People need to remove trees that are inhibiting development for housing. Some of these take up the whole backyard.	Noted. The Policy seeks to encourage and facilitate the protection of trees and to maintain and enhance tree canopy. The City considers that with appropriate design, in many instances development of housing and retention of mature canopy trees can occur simultaneously.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
64.3	The city should plant more large trees on council land like the foreshore and not allow a small elite group with councils ears to veto tree planting on the foreshore just to protect their property values.	Noted.

65	1/10 Hensman Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
65.1	Support	Noted.
Please tell us why.		

65.2	Policy will ensure that mature, healthy trees are retained.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
65.3	Nil.	Noted.

66	22 David Street Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
66.1	Support	Noted.
Please tell us why.		
66.2	Because of how important trees are and how many we're losing.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
66.3	Nil	Noted.

67	South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
67.1	Oppose	Noted.
Please tell us why.		
67.2	Council should not dictate vegetation conditions to private land owners.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
67.3	Will surely lead to litigation.	Noted. Refer to 'Liability and Safety issues' within the Consultation section of the report.

68	13 Henning Crescent Manning	
Comment		
Summary of Submission		Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
68.1	Oppose	Noted.
Please tell us why.		
68.2	I love trees but this is going too far. My neighbour has a coral tree overhanging my house and it causes such a mess. Every single weekend I'm picking up either leaves or flowers. Nice tree, wrong spot. With smaller and smaller block sizes, trees are becoming a nightmare. Seriously, I'm an environment lover, but please don't do this.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
68.3	Please DON'T DO IT!!!!	Noted.

69	71 Lansdowne Road Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
69.1	Support	Noted.
Please tell us why.		
69.2	The retention of trees on private properties is a 'mind set'. . Need a change of attitude as to Why? a tree needs to be removed...too often people do without thinking through. Trees are not the ownership of the property owner they belong to their neighbours and community. The impact on everyone including the animal life and environment has to be considered. So often the owner is a short time visitor to the community but their decisions to remove trees has a long term impact on the suburbs.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

69.3	Must retain unless a qualified arborist recommends otherwise.	Noted. Recommendations of an arborist report are a consideration in the Policy for the assessment process where tree damaging activity is proposed to a regulated tree.
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70	17 Addison Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
70.1	Support	Noted.
Please tell us why.		
70.2	The Council approved the building of a dwelling on my boundary fence line and to accommodate the building, several mature trees were removed from the fence line. This has resulted in the temperature outside my laundry reaching 59 degrees in summer.	Noted. The Residential Design Codes permit lot boundary walls in certain circumstances. The provisions of the Residential Design Codes as a State Planning Code take priority over provisions within a Local Planning Policy, however, the City would seek to liaise with future applicants as to the design of the development to attempt to mitigate any impact on regulated trees on adjacent properties.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
70.3	To retain verge trees, the Council should consider giving residents incentives to water the trees so that they don't drop limbs, or even worse, die.	Noted. Incentives can be considered as part of the future Urban Greening Strategy.

71	25 Sulman Avenue Salter Point	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
71.1	Support	Noted.
Please tell us why.		
71.2	Tree canopy is essential to keep temperature low. It is also just much more pleasant.	Noted. Refer to 'Benefits of tree retention' within the Consultation section of the report.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
71.3	<p>The process for problem or dangerous trees needs to be very simple and quick so problems can be actioned quickly.</p> <p>Noted. Refer to 'Liability and safety issues' within the Consultation section of the report.</p>

72	7D 73 Mill Point Road South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
72.1	<p>Oppose</p> <p>Noted.</p>
Please tell us why.	
72.2	<p>Trees on private property and owned by the owners of that property and should be able to deal with these trees as they see fit. This is complete government overreach.</p> <p>Noted. Refer to 'Impinging on Private Property Rights' and 'Role of Council in regulating land' within the Consultation section of the report.</p>
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
72.3	<p>Where trees encroach on to the footpath the council at that point should tell the owners to trim them where necessary. Try walking Angelo Street for example at the overhanging trees make it almost impossible to walk on the footpath.</p> <p>Noted. The City is responsible for maintaining trees on public land.</p>

73	46 York Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
73.1	<p>Support</p> <p>Noted.</p>
Please tell us why.	
73.2	<p>It is very unusual to see any block being developed with mature trees left behind. This is a consequence of perceived "value adding" by giving</p> <p>Noted.</p>

<p>potential buyers a clean block to build on. It is essential, in my opinion, that for the environment and amenity, mature trees should not be arbitrarily removed.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>73.3 I think it is well considered and thought out and I fully support it. Thank you.</p>	<p>Noted.</p>

<p>74</p>	<p>36 Renwick Street South Perth</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>74.1 Oppose</p>	<p>Noted.</p>
<p>Please tell us why.</p>	
<p>74.2 We have a block with an older house with a large tree in the front yard. We have chosen to keep the tree because we like it, but if this law looks like passing we will need to have it chopped down or risk losing the value in our block size for future sales as it will severely curtail development potential for whoever buys it next. This large block is our legacy to our children which we are already paying a premium in rates to secure. I don't think the council should be able to dictate what happens on private property which has been paid for by private citizens. There is plenty of public land which would benefit from the council planting large trees without them impinging on the rights of individuals to do what they need to with their own property. Given the current housing crisis, wherein the government is encouraging urban infill to provide for more accommodation this policy feels like virtue signalling and another chance at revenue raising,</p>	<p>Noted. Refer to 'Impinging on Private Property Rights' and 'Role of Council in regulating land' within the Consultation section of the report.</p> <p>Refer to 'Impact on achieving dwelling targets' in regulating land within the Consultation section of the report.</p> <p>The City will continue to plant trees on public land.</p>

as there will no doubt be a fine for those found to be disobeying this rule.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
74.3 Nil.	

75	172 Coode Street Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
75.1	Oppose	Noted.
Please tell us why.		
75.2	After speaking to property owners in other council areas who once supported this, after they experienced a health issue with a tree on their own property and wanted to immediately remove tree due to further imminent danger of property damage, the council required a full arborist report at owners cost and then a ridiculous wait period of assessment before they could have the tree removed. The tree had obvious signs of white ant damage in major limbs after already dropping a major limb on fence and shed. This policy just hampered what needed to be done in a quicker time period and at extra cost to the pensioner.	Noted. The City acknowledges that should Council adopt the Policy, determination of applications would need to be expedited for reasons such as those outlined in this submission.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
75.3	I think there should be a clause that photos of health affected trees should be able to be used as sufficient evidence for home owners to have control of removal or major lopping of large trees on their private land so it can protect pensioners and people who already are at extreme exposure to cost of living issues. Common sense should prevail to lesson red tape.	Noted. The Policy does not prescribe that an arborist report would be required to be submitted in support of an application, rather, the recommendations of an arborist report could be used to justify tree damaging activity to a regulated tree. The City would take a pragmatic approach to information requirements, and where photographic evidence is provided that clearly justifies the tree cannot be retained, will consider this information along with site investigations in assessing applications.

76	46 Axford Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
76.1 Support	Noted.
Please tell us why.	
76.2 For all the reasons that have been outlined - Mitigating the urban heat island effect Mitigating and adapting to the effects of climate change Enhancing and supporting biodiversity Maintaining the City's 'leafy green' character.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
76.3 Can't come soon enough!	Noted.

77	20 Unwin Crescent Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
77.1 Support	Noted.
Please tell us why.	
77.2 I have provisional support as I strongly support the retention of trees wherever possible. The trees that I grow provide habitat and/or food for native animals.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
77.3 I probably have 3 trees that would qualify. From time to time I need to organise pruning of these trees as they keep growing where they're not wanted - over the neighbour's fence or over my house or in a way that unbalances the tree. One of my trees is particularly vulnerable to strong	Noted.

	winds and for the safety of property, and possibly lives, I think balance is an important thing to keep in check.	
77.4	I see that the definition of maintenance pruning (Section 10) can only involve dead or diseased wood. It costs a significant amount to prune my tall trees and I don't want to have to employ an arborist as well to allow this. Also, presumably the City doesn't want to be swamped with applications for work that should be permitted. If the City is happy to regulate a tree that has been pruned over the years I don't understand why it would be unhappy for it to be maintained in the same way into the future. Where no long term damage is done to a regulated tree then that should be OK. It should be up to the City to prove long term damage rather than the owner having to prove that it isn't. Perhaps the City could allow a qualified tree-pruner to guarantee they have done no long term damage and that the work was appropriate. It would be interesting to discuss with other tree owners. I also note that Maintenance Item (e) would not necessarily involve dead or diseased wood. Could Maintenance Definition Item (a) have the word 'or' placed at the end as it is for the other provisions in this section?	Noted. The City has updated the Policy to include 'or' in the definition after 'involves removing dead or diseased wood only'.
77.5	I have no idea as to what the tree pruning standards are - referred to in Item (f), yet given that the previous item (e) ends with an 'and', that it applies in all cases (a) to (e) and therefore we somehow have to find out what they are. There is no definition of an amenity tree. From the definition of a regulated tree am I correct to understand that no pest tree will be considered as a regulated tree?	The City can provide advice as to the Australian Standards for pruning. The Policy does not apply to trees that are on a State or local weed register.
77.6	One of our trees, a Cape Lilac, cultivates pest caterpillars that we need to get rid of as they are a considerable nuisance to our	Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets which may otherwise be preferred by landowners/ developers over retaining

<p>neighbours and have caused them significant distress. I can see that the time might come when it all gets too much for us and we'd prefer to get rid of the tree and plant an alternative species. The tree is used by red-tailed cockatoos so that presumably its replacement should also be suitable for them to forage on. Provision should be made for allowing these trees to be removed and replaced without the need for paying a fee to the council. I note that there is no schedule of charges associated with this policy. Also I prune my Cape Lilac myself so that it doesn't become so big that I have to hire a tree-lopper. I hope that Maintenance Definition item 10(e) would allow this. I would be assuming it would if the pruning of non-disease living branches could be permitted. My Cape Lilac branches below 1.4 m so that perhaps there needs to be the qualification to Regulated Tree definition Item (c) 'or at point of forking whichever is the lowest'? Thanks for the opportunity to comment.</p>	<p>vegetation (i.e. development led design compared to tree retention led design). Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.</p> <p>The Policy provides for maintenance of trees, however, if the tree meets the definition of a regulated tree, development approval would first be required.</p>
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78	16 Woonan Place Karawara
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
78.1 Oppose	Noted.
Please tell us why.	
78.2 A tree may grow too large for the garden and require either removal or severe pruning.	Noted. If adopted by Council, the Policy would require development approval for pruning or removal of a regulated tree.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
78.3 I agree in principle that we need trees and we have them in our garden but they are on private property and therefore it should be up to the	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.

	landowner whether or not to do a heavy prune or even remove the tree if necessary.	
78.4	Focus should be on new developments where all the trees are removed. Karawara is a very leafy suburb with a good tree cover and it's very unlikely everyone would decide to remove trees at the same time. Our parks are kept covered in trees by the Council already and lots of new ones have been planted which is excellent. George Burnett park being a case in point but it's a shame that the trees planting did not continue all along Gillon Street beside the Rugby pitch as that is still very a very open grassed area.	Noted, however, as infill development occurs, removal of mature canopy trees on private property has incrementally occurred. The Policy seeks to provide regulation in this respect. The City will continue to plant trees on public land. The amount that can be planted in any season is subject to budget allocations.

79	43/2 Bruce Street Como	
Comment		
	Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
79.1	Support	Noted.
Please tell us why.		
79.2	WA is currently lagging behind all other States within AU in regard to the greening of our State. I would dearly love to see this situation be taken seriously, knowing how important it is to retain and grow as many trees as possible without posing a health risk to our Citizens.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
79.3	Nil	Noted.

80	18 Downey Drive Manning	
Comment		
	Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
80.1	Oppose	Noted.
Please tell us why.		
80.2	It is important to allow the infill of new housing without introducing unnecessary roadblocks. We have a severe house crisis in WA. The development of the tree canopy should be addressed on the public soil: streets, verges, parks etc.	Refer to 'to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report. The City will continue to plant trees on public land.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
80.3	This policy when managed at council level introduce disparity with adjoining council. As a result it will direct developers and investors away from South Perth with the risk to be left behind when it comes to develop new building and centers of aggregation.	Noted.

81	46 York Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
81.1	Support	Noted.
Please tell us why.		
81.2	Totally support this initiative, it is long overdue. With present extreme climate conditions, exacerbated by the loss of tree canopy it is more important than ever to do as much as we can to increase and maintain our surviving trees. Please do it for the future of our children. This retention of trees should have nothing to do with money or views, it is for everyone's benefit.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

81.3	Nil	Noted.
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82	307 Canning Highway Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
82.1	Support	Noted.
Please tell us why.		
82.2	It's critical that we maintain our existing canopy. Trees of the scale discussed under this proposal are mature and would take a long time to replace.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
82.3	Whilst I believe seeking approval to remove these trees is an important step. I believe that paperwork/administration and associated admin fees should be minimal. Similarly having clearer and more proactive information sharing around issues such as the shot-hole borer is also an important element to consider when regulating tree management.	Should Council adopt the Policy, it is recommended that Council waive fees associated with applications for development approval for tree damaging activity to a regulated tree. The City will continue to provide updates on shot-hole borer movements on the advice of the Department of Primary Industries and Regional Development.

83	4/30 Alston Avenue Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
83.1	Oppose	Noted.
Please tell us why.		
83.2	There should be laws against trees that destroy neighbours property. The council does nothing.	Damage from trees between neighbouring properties is a civil matter. If there is a cost involved in rectifying damage caused by trees on private property, landowners should reach an agreement with their neighbour about who

	will pay the costs before work is commenced. If agreement cannot be reached, landowners may have to apply to court for an order that legally obliges the neighbour to have the branches or roots removed and/ or the damage to the property fixed.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
83.3 Nil	Noted.

84	2 Wattle Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
84.1 Support	Noted.
Please tell us why.	
84.2 We need to keep as much tree canopy as possible.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
84.3 Nil	Noted.

85	3/8 Hensman Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
85.1 Support	Noted.
Please tell us why.	
85.2 Too many trees removed especially in new developments.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
85.3 Nil	Noted.

86	9 The Strand Applecross
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
86.1 Support	Noted.
Please tell us why.	
86.2 We need trees.	Noted.
86.3 The idea is wonderful we desperately need trees. If anything the draft could go further.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
86.4 Nil	Noted.

87	32 Ridge Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
87.1 Support	Noted.
Please tell us why.	
87.2 It's obvious that our suburb is losing trees with horrendous development as well as heat and borer.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
87.3 Nil	Noted.

88	177 Mill Point Road South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
88.1 Oppose	Noted.
Please tell us why.	

88.2	The draft LPP for Tree Retention, with significant restrictions on private property owners, will result in few trees being planted on private property in the future as owners will fear losing future choices around the development and maintenance of their privately owned property. In addition this draft LPP will motivate private property owners to maintain trees in a manner that ensure trees do not reach the status of a Regulated Tree.	Noted. The Residential Design Codes prescribe minimum tree planting requirements for new development.
88.3	This policy has the potential to negatively impact future property valuations through the inability to prune, move or wholly remove trees. The City, and Rate Payers, will also be opening itself up to future litigation for compensation by private owners for this retrospective planning restriction.	Noted. Increase or decrease in property values is not a material planning consideration. Refer to 'Liability and Safety issues' within the Consultation section of the report.
88.4	Note, just the release of this draft LPP will inadvertently direct private owners to act immediately on any potential future tree pruning or removal activity to safe guard against future restrictions imposed by the City.	Noted. The City acknowledges that an unintended consequence of the Policy is the pre-emptive removal of trees.
88.5	Of important note, if approved this draft LPP will also inadvertently exacerbate challenges around urban infill targets by adding further hurdles for developers at a time when Western Australia urgently requires more housing.	Noted. Refer to 'Impact on achieving dwelling targets and limiting development' in regulating land within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
88.6	I fundamentally believe it is inappropriate for the City to impose this type of planning restriction on private property owners. This draft LPP is a serious form of overreach and betrayal of Rate Payers trust.	Noted. Refer to 'Role of Council' in regulating land within the Consultation section of the report.
88.7	This draft LPP will not achieve its objective of encourage and facilitating the protection of trees and will fail to maintain and enhance the tree canopy within the City.	Noted.

89	136 Angelo Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
89.1 Oppose	Noted.
Please tell us why.	
89.2 I oppose local government intervention on what I can do with my trees or plants on my private property.	Noted. Refer to ‘Impinging on Private Property Rights’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
89.3 Nil	Noted.

90	67 Dyson Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
90.1 Oppose	Noted.
Please tell us why.	
90.2 As a matter of principle the City of South Perth should only have jurisdiction and control of trees on public property and definitely not trees on private property.	Noted. Refer to ‘Impinging on Private Property Rights’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
90.3 Nil	Noted.

91	136 Angelo Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

91.1	Oppose	Noted.
Please tell us why.		
91.2	I think people should be allowed to decide whether to keep or remove trees on their own land.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
91.3	Nil	Noted.

92	7s/9 Parker Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
92.1	Support	Noted.
Please tell us why.		
92.2	Tree canopy is crucial for habitat for native fauna, mitigation of heat for better human health and for improved community wellbeing. Protecting trees via any mechanism is important.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
92.3	Nil	Noted.

93	85 Manning Road Manning	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
93.1	Support	Noted.
Please tell us why.		
93.2	Tired of seeing trees removed for development.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
93.3	Push for more trees along Manning Road, near Ley St.	Noted.

94	2/39 Milson Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
94.1 Oppose	Noted.
Please tell us why.	
94.2 Because one example in Elizabeth Street South Perth, on the corner of Addison Street, a mature verge tree was removed without consultation by ANYONE, for presumably, an owner to enable installation of electrical solar panel installations facing North onto Elizabeth Street.	Noted. The verge tree in question was damaged in a storm. The species (flame tree) has soft wood and often disassembles itself as the limbs become heavy. The City made the decision to remove the tree.
94.3 This is as odds with what the grand nature preservation is proposed.	Noted, however, it is unclear how this relates to the Policy.
94.4 The removal of this Shire Verge Tree is what I consider disgusting to say the very least. Why the survey question, if not any tree to be removed for reasons unknown other than safety?	See comments above.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
94.5 Proposed Shire Tree Retention regulations on Private Owner / Occupiers Property should be kept as owner business planting and maintenance.	Noted. Private properties within the City are predominantly residential zoned properties.
94.6 Keep Shire Verge Tree Regulations as Most Important Consideration... It's what makes Living Natural Beauty and Admiration for ALL people and future generations that visit and live in our community.	Noted.

95	104B Lockhart Street Como
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
95.1	Support	Noted.
Please tell us why.		
95.2	It is really important that we: prevent the creation of urban heat islands; ensure that we do not threaten our bird and animal habitats; ensure our environment helps to reduce carbon and enhance our mental and physical health.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
95.3	The increased infill and high rise development has already seen large gardens completely erased and the felling of all mature trees to make way for concrete towers. Token roof gardens are no substitute for mature trees. Magpie families in the Canning Bridge area are very territorial and rely on trees in the gardens, streets and areas around McDougall park for nesting and breeding. Development and the felling of mature trees threatens the magpie families as they will quickly lose their homes.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
95.4	I fully support the policy in its draft form. It is very important, however, that it is not over - ridden by state planning appeal committees and that as many trees as possible are preserved. There also needs to be provision for the replacement of trees by developers. If trees are cut down an equivalent number should be replanted. There should also be significant penalties for developers who flout the policy. So there need to be photographic records of properties before demolitions.	Noted. An affected person may apply to the State Administrative Tribunal for a review of a reviewable determination in accordance with the <i>Planning and Development Act 2005</i> . The maximum penalties under the <i>Planning and Development Act 2005</i> are significant and are currently \$200,000 in the case of a natural person and \$1,000,000 in the case of a body corporate, with the potential for additional daily penalties in the case of ongoing non-compliance.
96	5 Riverview Street South Perth	

Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
96.1 Support	Noted.
Please tell us why.	
96.2 Because the climate crisis is real, and our suburb is losing important tree coverage and its beautiful character.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
96.3 Yes - listen to young people!	Noted.

97	14 Renwick Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
97.1 Support	Noted.
Please tell us why.	
97.2 Too many trees are being removed without any consultation.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
97.3 Trees benefit our environment in many ways and we need to have a green promotion policy at local planning level.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.

98	39b Bessell Avenue Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
98.1 Support	Noted.
Please tell us why.	

98.2	The total tree canopy is very important for environmental reasons but also for health and well-being of the community. It's a huge step forward to have some controls in place for trees on private land.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
98.3	Very happy with the intent of the policy but obviously with all the specific parameters about which trees are regulated or exempt it will be important to monitor the implementation and particularly see whether those parameters need to be adjusted at some point to improve effectiveness and workability. But rather than debate the finer points of height or trunk diameter it's a great opportunity to establish the policy as soon as possible and provide mechanisms to review and modify the finer details as needed later. Please ensure the policy includes mechanisms for monitoring and reporting. Thank you.	Noted. The City agrees that effective implementation relies on monitoring and compliance, with suitable data required for this purpose.

99	5 McKay Court Bibra Lake	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
99.1	Support	Noted.
Please tell us why.		
99.2	Perth needs to retain mature trees to help combat urban heating.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
99.3	Nil	Noted.

100	5 Mckay Court Bibra Lake	
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
100.1 Support	Noted.
Please tell us why.	
100.2 Perth needs to take the retention of our existing tree canopy seriously. I am concerned about climate change, the ever-increasing urban heat island effect of our built environment and the general wellbeing of our eco-system. We also need to retain trees for the sake of our wildlife that is quickly losing their habitat due to urban sprawl and development. It doesn't just take a year or two for a tree to reach maturity and it is vital to introduce laws/ policy that will put nature first before capitalist ventures.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
100.3 Lower the height limit and decrease the canopy diameter.	Noted. The tree size was chosen to align with the medium tree size contained within the Residential Design Codes, being 6.0-9.0m for canopy diameter and 8.0-12.0m for tree height.

101	73A Ardross Ardross
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
101.1 Support	Noted.
Please tell us why.	
101.2 Perth needs to take the retention of our existing tree canopy seriously. I am concerned about climate change, the ever-increasing urban heat island effect of our built environment and the general wellbeing of our eco-system. We also need to retain trees for the	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

sake of our wildlife that is quickly losing their habitat due to urban sprawl and development. It doesn't just take a year or two for a tree to reach maturity and it is vital to introduce laws/ policy that will put nature first before capitalist ventures.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
101.3 Please save our future.	Noted.

102	57 Collins Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
102.1 Support	Noted.
Please tell us why.	
102.2 I have a large lily pillly that provides habitat for local birds and insects.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
102.3 Yes, as being a custodian of my tree it affects my ability to be able to develop to the extents of my property as neighbours have done. A though I love having a garden that supports native birds and creates a cooling space in summer, my house is only two bedrooms with a verandah. It would be nice to see some rate relief for owner of large trees. This saving would provide budget if any development needed to be done at a later date to mitigate the application fees, which seem quite high. I think fair pruning and pruning of low branches should be allowed as it is only done rarely.	Noted. This proposal relates to a local planning policy only; however, it is open for Council to consider rate concessions as part of future budgets.

103	96 Banksia Terrace Kensington
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
103.1 Support	Noted.
Please tell us why.	
103.2 The protection of the tree canopy across the City and the Perth region more broadly is essential for environmental, health and amenity outcomes; the proposed LPP strikes a reasonable balance	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
103.3 Multiple trees forming a combined area could be considered for protection too.	Noted.

104	94 Coode Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
104.1 Support	Noted.
Please tell us why.	
104.2 Obviously biodiversity and heat island benefits	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
104.3 Threshold should be less. Include more trees.	Noted, however, the Policy seeks to retain mature canopy trees in the first instance.

105	177 South Terrace Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
105.1 Support	Noted.

Please tell us why.	
105.2	To maintain the leafy green aspect of this CoSP. For bird life. To keep us as cool as possible in a warming climate.
	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
105.3	I don't want wall to wall rooves - keep the trees.
	Noted.

106	Arlington Avenue South Perth		
Comment			
<table> <tr> <th>Summary of Submission</th><th>Comment</th></tr> </table>		Summary of Submission	Comment
Summary of Submission	Comment		
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?			
106.1	Support		
	Noted.		
Please tell us why.			
106.2	I'm in south Perth on Arlington avenue. Last year, the new neighbours cut down all the large trees within the first week of receiving their keys. It was a little sad to see the trees go with out little thought. We'd hear lots of birds there every day and now they are gone. This is great... I'd like to see it implemented.		
	Noted.		
Do you have any other comments about the draft Local Planning Policy - Tree Retention?			
106.3	Nil		
	Noted.		

107	18 Monk Street Kensington		
Comment			
<table> <tr> <th>Summary of Submission</th><th>Comment</th></tr> </table>		Summary of Submission	Comment
Summary of Submission	Comment		
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?			
107.1	Support		
	Noted.		
Please tell us why.			
107.2	Perth has such a low urban canopy and with the effects of climate change being very real, we need to protect our		
	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.		

future. Trees provide such a wonderful streetscape which enhance the beauty and value of city of South Perth.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
107.3 No	Noted.

108	4/9 River View Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
108.1 Support	Noted.
Please tell us why.	
108.2 South Perth is rapidly losing tree canopy coverage through higher density development, drought, pests (eg. shothole borer) and many ageing trees that are now post-mature and at end of life. Much of the tree loss is on private land and there is insufficient tree planting and retention on public land to offset the deficit. Significant trees both on private and public land should be protected under a Regulated Tree Retention policy. As the climate becomes dryer, trees on public land that do not receive regular watering will struggle to survive, whereas trees on private land may receive more water from the landowner.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
108.3 While I support this draft policy and hope that if the policy is adopted it may help save some of the significant trees in South Perth, I am not sure that it will be particularly successful. The current zoning allows many of the larger blocks in the city, that currently have older homes and large trees, to be subdivided. Invariably, the new houses cover the entire blocks and there is little room for gardens and no	Noted. The City acknowledges the need to balance tree retention with provision of housing and achieving infill dwelling targets. With the exception of those properties within an activity centre, height of new development is regulated by the Residential Design Codes. The City will continue to maintain and plant trees on public land where possible.

room for large established trees that are seldom on the boundaries where they could possibly be retained through more sympathetic development. Increasing the height limit of some properties to reduce the footprint on the buildings would seem to be a more practical solution rather than allowing buildings to extend very close to boundaries. Council should also be accountable for retaining significant trees on public land wherever possible and look at development alternatives where significant trees may be impacted.	
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109	2/82 Campbell Street Surry Hills NSW 2010
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
109.1 Support	Noted.
Please tell us why.	
109.2 Trees are very important for biodiversity and mitigating urban heat. The benefits they provide aren't well known and appreciated by most.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
109.3 There should be provisions for replacement of 2 new trees for the removal of any regulated trees for any reasons it is removed to ensure tree canopy is maintained.	Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets which may otherwise be preferred by landowners/ developers over retaining vegetation (i.e. development led design compared to tree retention led design). Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.

110	6 Joseph Street West Leederville
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
110.1 Support	Noted.
Please tell us why.	
110.2 Big trees are important to our safety as climate change takes effect, they create cool, micro climates. They are also important to community mental health.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
110.3 Nil	

111	36 Monk Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
111.1 Support	Noted.
Please tell us why.	
111.2 Tree canopy is crucial to reduce heat island temperatures; Mature trees reduce the need for excessive air conditioning e electricity and fossil fuel use; Trees require less water than lawn; Trees provide habitat for native flora, especially in City of South Perth for endangered cockatoos; and also nectar for bees, which are crucial to food production; Trees add financial value to homes; Trees provide health benefits through the creation of well-being environments.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
111.3 Please pass these amendments to protect mature trees.	Noted.

112	Mill Point Road
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	South Perth	
Comment		
	Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
112.1	Support	Noted.
Please tell us why.		
112.2	Trees are important to the landscape for both resident well being as well as climate change reasons. As a south Perth resident it would be wonderful to see this valued by the council. With many trees expected to die in the coming year due to not enough water, it is important to keep established trees as protected as we can as mitigation.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
112.3	Nil	Noted.

113	45 Hensman Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
113.1	Oppose	Noted.
Please tell us why.		
113.2	I believe if the trees are on your property, you should be able to prune them back when necessary. if the trees are from overhang from Neighbour's you should be able to cut back to your side of the fence. I do not think that getting permission to cut the trees down to make them more manageable for the owners or renters. The council should be more responsible for the street trees.	<p>If a tree from a neighbouring property has branches and/or roots that encroach into your land, you are entitled to remove the material up to the boundary of your property without the prior approval of your neighbour.</p> <p>Should Council adopt the Policy, development approval to undertake such works would first be required where works are proposed to a regulated tree.</p> <p>The City will continue to monitor and maintain street trees.</p>
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

113.3	Some trees in the areas have been around for a long time and are too big. They need cutting back. these are street trees which some are showing signs of dying. They create danger as branches fall easily on adults and children. The leaves also drop and block drains. The underground power has meant some trees are too big for the verges cracking footpaths and roads. There is certainly a need for some kind of rejuvenation of a planning policy.	Noted.
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114	Angelo Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
114.1	Support	Noted.
Please tell us why.		
114.2	Surely we need more trees in our dessert like environment. More trees and less block filling houses.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
114.3	A great concept. A shame the State Government doesn't seem too interested.	Noted.

115	7 Howard Parade Salter Point	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
115.1	Support	Noted.
Please tell us why.		
115.2	Because our dwindling tree canopy is disastrous and developers are not interested.	Noted.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
115.3 Support it in full.	Noted.

116	PO Box 969 South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
116.1 Oppose	Noted.
Please tell us why.	
116.2 I don't agree that the Council can have a say about trees on private property.	Noted. Refer to 'Role of Council in regulating land' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
116.3 Nil	Noted.

117	31 Carr Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
117.1 Support	Noted.
Please tell us why.	
117.2 There are far too many trees being cut down when a block gets cleared, with no thought of retaining. Alas, I feel people will just do what they want anyway & poison/kill them if they are determined. Look what's happened on the foreshore when their views are obstructed from their mansions. Some people will comply however, and we should be aiming for the coverage like that in Adelaide SA.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
117.3 Nil	Noted.

118	2/21 Karoo Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
118.1 Support	Noted.
Please tell us why.	
118.2 Trees are important for shade, oxygen, health and are also important from an aesthetic point of view.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
118.3 Nil	Noted.

119	65 Broadway Bassendean
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
119.1 Support	Noted.
Please tell us why.	
119.2 Because people need to genuinely consider integrating existing site conditions when purchasing, developing and building on land and give greater respect and priority to trees.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
119.3 Nil	Noted.

120	65 Broadway Bassendean
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

120.1	Support	Noted.
Please tell us why.		
120.2	Trees should be protected and we should be improving our canopy cover across the country.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
120.3	Plant more, don't remove.	Noted.

121	11 Hampden Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
121.1	Oppose	Noted.
Please tell us why.		
121.2	If the tree falls on the private property. It is up to the owner of the property to ascertain if it is to be retained or removed. We do not live in a communist state and therefore the city of South Perth is over reaching in its duty to provide services to the community.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
121.3	More focus needs to be provided to the appalling street trees, whereby urgent replacement by the city of South Perth is required. Many of the trees are dying and replacement now will result in a favourable outcomes in 10 to 15 years. Inaction only results in further decline.	Noted. Whilst this Policy relates to trees on private property, the City will continue to monitor, maintain and plant trees on public land.

122	38 Strome Road Applecross	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
122.1	Support	Noted.

Please tell us why.		
122.2	I 100% this because we need to increase our tree canopy and private landowners need to assist and be responsible for this. It's so sad watching trees be knocked down for development. We need trees for our mental health and for our wildlife to thrive as well as for heat reduction.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
122.3	Nil	Noted.

123	2/39 South Perth Esplanade South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
123.1	Oppose	Noted.
Please tell us why.		
123.2	Do not agree with the imposition on private property. Bureaucracy gone mad for even considering such stupidity. Inconsistent with current high density planning. High rise developers get free rein. Smaller developers cop shit. If I had a tree that met the mandated criteria it would be cut down before the consolation period closes.	Noted. Refer to ‘Impinging on Private Property Rights’ within the Consultation section of the report. The Residential Design Codes - Volume 2 – Apartments, seeks to retain mature trees in the first instance and otherwise requires tree planting in deep soil areas.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
123.3	Why are we paying council rates for this social engineering crap? What is the actual number of trees that fall in to this category and there location As with most feedbacks I am wasting my time and fail to understand the council involvement.	Noted. Should Council adopt the Policy, it is recommended that the Policy be suspended until such time the City has accurate data of the number and location of trees on private property that meet the definition of a regulated tree.

124	61a Gallipoli St Lathlain	
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
124.1 Support	Noted.
Please tell us why.	
124.2 Far too much removal, we need to retain!	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
124.3 Brilliant, I hope other City/Town councils follow swiftly!!	Noted.

125	South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
125.1 Oppose	Noted.
Please tell us why.	
125.2 Because you are refusing to pay the private land owner for the now massive costs of maintaining a large tree: gutter cleaning (yours and that of your neighbours), multiple times per year - about \$2000-3000 p.a.. Pruning by a qualified arborist: up to \$5000 p.a. Dealing with ENDLESS complaints from neighbours - since COUNCIL have allowed them to build McMansions right up to the fenceline, plus pools, decking and pergolas - you are not paying the legal costs of fighting all that. STOP trying to push all those costs onto private citizens.	Noted, however, landowners are already responsible for the costs associated with maintaining trees on private property. The City is required to consider new development in accordance with the requirements of the Residential Design Codes, which provide for walls on boundaries in certain circumstances.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
125.3 Yes. If people want large trees then it MUST be a shared cost. And YOU Have to deal with the endless complaints from adjacent properties. Why not massively increase the public canopy? then everyone can share the now VERY HIGH cost of	Noted.

managing a large tree. Many of the large trees on private land were planted decades ago - they are inappropriate to be close to buildings.	
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126	133 Gwentyfred Road Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
126.1 Support	Noted.
Please tell us why.	
126.2 We need trees, they cool everything down and provide habitat for birds.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
126.3 No	Noted.

127	72 River Way Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
127.1 Support	Noted.
Please tell us why.	
127.2 To take the reasons directly from the Tree canopy advocates (because I 100% agree with them)Trees cool our suburbs, Trees provide habitat and food for our wildlife, Trees help to combat climate change, Trees clean our air and water quality, Trees improve our physical and mental health and wellbeing, Trees reduce stormwater runoff and erosion, Trees make our suburbs beautiful, Trees reduce energy costs in our homes, And so much more.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
127.3 Nil	Noted.

128	72 River Way Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
128.1 Support	Noted.
Please tell us why.	
128.2 We are facing multiple ecological crises that threaten Perth's viability as a place to live and quite possibly humanity's very survival - note the recent long dry and hot period and resultant dead trees as just one symptom of many. It is vital we do all we can to restore the ecologies around us, including but not only tree coverage.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
128.3 Please consider this only the beginning of actions we need to take.	Noted.

129	69 Henning Crescent Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
129.1 Support	Noted.
Please tell us why.	
129.2 Improve tree canopy, so many blocks are completely stripped of vegetation, and old trees are just disposed of.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

129.3	Hope it goes through to improve the ability for us to walk in a cooler suburb in the summer.	Noted.
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130	Sydney Street North Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
130.1	Support	Noted.
Please tell us why.		
130.2	We are losing so many significant healthy trees to development and Polyphagous Shot Hole Borer. We need the trees and shade to help our city stay cooler, provide habit and food to support biodiversity. Regulation will help retain healthy trees for the benefit of the whole city.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
130.3	The whole state should be targeting 30% tree canopy by 2040.	Noted.

131	213B Hill View Terrace Bentley	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
131.1	Oppose	Noted.
Please tell us why.		
131.2	This in my opinion actually the wrong way to go about it. The biggest problem I see is verges that do not have significant tree coverage and that developments are not required to have sufficient front and back set-back for vegetation. We see quite common now single and multi-storey developments that are fundamentally boundary to	Noted. Whilst the City will continue to plan within road reserves, the reserve/ lot boundaries are already determined and therefore can only plant in the existing width of the reserve. Primary street setbacks are in accordance with the Residential Design Codes, and whilst the City's preference is for planting within street setbacks, there is no requirement

boundary with no room for trees of any kind. The R-code typically from R20 onwards has no requirements for usable rear or side set-backs to break up the heat island effects.	contained within the Residential Design Codes as to the location of the tree(s) required to be planted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
131.3 LG should refrain for making extra restrictions except under the planning code on private property.	Noted.

132	3/4 Strickland Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
132.1 Support	Noted.
Please tell us why.	
132.2 Fully support the tree retention policy and thank the CoSP for formulating the policy. I've lived in South Perth for 25 years and over that time have closely watched many valued tree species disappear overnight for no apparent valid reason. (Both public and private land) I have been patiently waiting for CoSP to be proactive on this important issue for far too long, much has already been lost.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
132.3 I'd like to understand if every tree in South Perth that passes the requirements is to be included the policy?	The Policy would apply to every tree on private property that meets the definition of a regulated tree as contained within the Policy.

133	112 Lansdowne Road Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

133.1	Support	Noted.
Please tell us why.		
133.2	Large trees should be kept, either native or exotic trees should not be destroyed when a block of land is cleared. All new builds should be required to plant 3 shade trees foot path tree canopy is needed. heavy fines for anyone who removes large trees on private property.	Noted, however, the Policy is not proposed to apply to trees on a State of local weed register. Tree planting requirements are provided within the Residential Design Codes, and the City cannot adopt a local planning policy that varies these requirements without the approval of the Western Australian Planning Commission.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
133.3	Drought resistant street trees are needed and trees that provide bird life and wildlife habitat. Get rid of Box trees and Jacaranda trees. Long term planning of habitat and food trees for black cockatoos all new builds should require processing of grey water to be safely used on gardens and street trees.	Noted.

134	43 Birdwood Avenue Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
134.1 Support	Noted.
Please tell us why.	
134.2 Soften the hard landscape, clean the air, provide habitats for wildlife.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
134.3 Nil	Noted.

135	Munsie Ave Daglish
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
135.1 Support	Noted.
Please tell us why.	
135.2 Trees are vitally important to prevent heat temperature where we live and to oxygenate. They are aesthetically pleasing to look at and help our mental health. They take a lifetime to grow so cannot be replaced quickly.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
135.3 It is good that it is being considered but will be better if it's put in place, hopefully the council will consider this the right thing to do and you will lead by example.	Noted.

136	14 Lawler Street South Perth 6151
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
136.1 Support	Noted.
Please tell us why.	
136.2 This is a great initiative by the City to maintain and increase the tree canopy in South Perth and surrounds. I fully support the LPP as we know that more canopy means cooler temperatures and more liveable neighbourhoods.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
136.3 I would like to recommend that in the event that a regulated tree is removed that the requirements for replacement are strengthened. Often trees can be planted and then die after one summer if they are not maintained. Perhaps a condition of approval with more longer term monitoring and maintenance of replacement trees by the landowner would be useful.	Should a regulated tree be removed without approval, it would be open to the City to commence prosecution action in accordance with the enforcement provisions of the <i>Planning and Development Act 2005</i> . The maximum penalties under the <i>Planning and Development Act 2005</i> are significant and are currently \$200,000 in the case of a natural person and \$1,000,000 in the case of a body corporate, with the potential for additional

	daily penalties in the case of ongoing non-compliance.
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137	Talbot Avenue Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
137.1 Oppose	Noted.
Please tell us why.	
137.2 The council should be looking after trees that are on the verge or in park, as the council is currently unable to complete this task, it should not start moving into private land.	Noted. Refer to ‘Planting on public land’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
137.3 The cost of try to enforce this policy and the delays it can cause in planning approval outweighs the issue.	Noted.

138	76 Banksia Terrace Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
138.1 Support	Noted.
Please tell us why.	
138.2 I have resided in the area for over 73 years and in that time I have been appalled at the redevelopment where blocks are totally cleared of all vegetation. Buildings are permitted to cover nearly all the land with no space remaining for a tree of any size and therefore creating heat sinks. Most of the buildings have black roofs as well which create heat sinks.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

138.3	The street trees planted in Cygnia Cove are inappropriate. Most have not thrived after being planted up to 8 years ago and provide no shade. Deciduous trees which provide a shade canopy in summer and sun in winter would be a better solution.	Noted.
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139	22/39 Angelo Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
139.1	Support	Noted.
Please tell us why.		
139.2	Canopy cover, provided by mature trees is essential for the reduction of heat and the ability to grow more vegetation under it. It is essential for the reduction of heat in summer, which has detrimental effects on people of all ages as well as the native animals and the ecosystem. The removal of trees is short sighted and an act of vandalism to the environment. A tree that has taken 20 years or more to grow is a valuable addition to the streetscape. Builders and developers should not be able to clear blocks of land without any thought to the environment. Builders are clearing blocks and fitting as many triplex units they can on blocks. They leave the minimum amount between properties. There is nothing to dampen the level of noise between properties. Established vegetation is really valuable as a buffer for noise reduction and privacy between properties. The more clearing of trees, the less hospitable the environment is for the breeding of waterfowl and other native animals like tortoises. We must act immediately to secure a future for those who do not have a say	Noted.

<p>in what happens today. Our grandchildren and future generations have a right to be born into an environment that has been respected by their ancestors, not neglected and vandalised, with no thought for tomorrow. There will only be a tomorrow if we act today and stand up to the thoughtless capitalists who put profit before the environment.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>139.3 Nil</p>	<p>Noted.</p>

<p>140</p>	<p>106 Angelo Street South Perth</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>140.1 Support</p>	<p>Noted.</p>
<p>Please tell us why.</p>	
<p>140.2 Sad to see the removal of established trees.</p>	<p>Noted.</p>
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>140.3 Nil</p>	<p>Noted.</p>

<p>141</p>	<p>6 Hovia Terrace South Perth</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>141.1 Oppose</p>	<p>Noted.</p>
<p>Please tell us why.</p>	
<p>141.2 Many & varied reasons. The Council should not have this degree of intrusive control over trees in a person's property. It is for the owner to assess if a tree is suitable or not. It is unconscionable that an owner</p>	<p>Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.</p>

<p>would have to vet such an action through a third party, including paying for the application. Such legislation will discourage individual owners to plant what will could eventually become a significant tree. I believe this particular piece of legislation will only cause undue anxiety, expense and bureaucracy for many homeowners, such as myself, who have the wrong trees planted in the wrong place. Many of us living in older homes may fall in this category. What may have started off as an attractive tree, popular at the time, has over 80+ years become huge, unsuitable for its location and problematic. Why should that person need to seek permission from the Council and wait for a judgement before they can redress their situation, a judgement that could go either way?</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>141.3 Over the years, the Council has been negligent in its street tree planting program and is now trying to move the responsibility for canopies to individual owners. An example of this is how the Council has insisted on planting the unsuitable Agonis in my particular area, a tree that dies year after year. Every year the agonis are replanted with the same agonis dying yet again within 12 months. This has been the case for over a decade now and still the council repeats its mistakes. What is it that the Council is not learning from this experience? It would be fair to say that the Council devalued all homes in my street by its abhorrent action to raze the original established mature trees, to decimate the canopy in my street, but now it expects individuals to retain what that person may consider to be a very unsuitable and inappropriate tree that has been growing on their block. The Council has allowed houses to be built from boundary to boundary with no or</p>	<p>Noted. The City will continue to plant street trees.</p> <p>Council Policy P210 – Street Verges, does not permit the use of synthetic turf.</p> <p>Perth has the lowest tree canopy cover of any Australian capital city, at just 16%. The City considers that providing canopy on both public and provide land will seek to increase urban canopy across the district.</p>

<p>minimal green space. The Council has permitted large new buildings to be constructed with no set back or green space. The Council appears to permit synthetic turf to be used on verges. Why when the Council has such a track record, does it now want to purport to tell owners what to do with their own trees. If the Council is serious about canopy it should get its tree verge programme working before it seeks to legislate what individuals can do. Let the Council look at its own verges and parks and plant some appropriate trees on that space before it legislates what individuals can do in their backyard - look at the park on Delaware/Swan Terrace intersection as a case in point. Sad park, isn't it? So in summary - I ask the Council themselves to plant trees that are going to survive, thrive and provide a habitat on many of the areas where it currently can do so. When the Council eventually gets it right, only then should it start to consider what it can encourage individual owners to do about their own trees.</p>	
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142	12 Hazel Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
142.1 Support	Noted.
Please tell us why.	
142.2 I disagree with owner/builders being able remove to all established and other trees from blocks to build house. If owners removed establish trees to build there should be a council policy that stipulates the owner must commit to replanting a percentage of the trees that were taken out.	Noted.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
142.3 Establish trees (i.e 20 year healthy gum tree on private property) should be included in tree registrations if the owner chooses to.	Noted. It is likely that such trees would meet the definition of a regulated tree contained within the Policy.

143	46 Anstey Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
143.1 Support	Noted.
Please tell us why.	
143.2 We need more trees on private property and to stop developers from taking them down.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
143.3 Nil	Noted.

144	75 Gwentyfred Road Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
144.1 Support	Noted.
Please tell us why.	
144.2 Mature trees and the tree canopy in general is undervalued. It is one of the best features of living in City of South Perth.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
144.3 Pleased to hear that tree retention is being valued.	Noted.

145	46 Redmond Street Salter Point
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
145.1 Support	Noted.
Please tell us why.	
145.2 There is a need to ensure that as many trees as possible thrive in our suburbs. The recent hot summer and clearing of blocks before building means we are losing too many trees. We need to retain trees wherever possible.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
145.3 Need to ensure as many trees as possible are retained.	Noted.

146	37/144 Mill Point Road South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
146.1 Support	Noted.
Please tell us why.	
146.2 Trees heal the soul, are homes to animals and birds, clean our air and are just beautiful.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
146.3 About time.	Noted.

147	Private - non disclosed. Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
147.1 Oppose	Noted.
Please tell us why.	

<p>147.2 While I support registering trees on public or council land as Regulatory Trees, I do not believe applying this to all private properties is appropriate. Most private properties in the shire are below 800 sqm, and large trees on small blocks can be hazardous. Does this proposal allow for distance exemptions? Large root systems can damage services and infrastructure, and there are also considerations regarding solar power generation. Additionally, large trees can block natural light, reduce available outdoor space, and pose risks during storms due to falling branches. They can also lead to increased leaf litter, which can clog gutters and increase maintenance needs. If the City proceeds with this register, is it prepared to cover the costs for private property owners, including tree maintenance, surrounding infrastructure, and gutter cleaning? Moreover, the cumbersome and restrictive nature of applying for development approval to maintain the tree raises concerns. Who bears this cost? The additional paperwork burdens both residents and council, further complicating the process. Additionally, the impact on neighbouring properties needs consideration, as liaising between property owners can further complicate the process and create potential disputes.</p>	<p>Noted. The City recognises that pruning of mature trees on private property may be required for the reasons outlined in this submission. The Policy provides for maintenance pruning, as well as review of advice from an arborist or structural engineer to determine the impact of the tree and whether it should be removed.</p> <p>Requiring a development application prior to such works occurring ensures this level of assessment is undertaken prior to regulated tree being pruned/ removed, to assist in the retention of trees were possible.</p> <p>Landowners are already responsible for the cost of maintaining trees on private property. Should Council adopt the Policy, the City would seek to provide timely advice and information to ensure the lodgement/ assessment process is as simple as possible for landowners.</p>
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>147.3 I'm glad to see the council showing interest in the tree canopy. However, I believe the city should do more to care for existing street trees, particularly those heavily pruned due to a lack of underground power. Additionally, it's disheartening to note the absence of plans for tree planting along the South Perth Foreshore for our future. While I understand the importance of tree regulation, the proposal does feel somewhat burdensome on private</p>	<p>Noted. The City is in the process of preparing an Urban Greening Strategy which will consider appropriate species and planting locations.</p>

landowners and appears a little hypocritical on the council's part.	
148	4 Lockhart Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
148.1 Oppose	Noted.
Please tell us why.	
148.2 Whilst I appreciate nature, I do not want to be constrained IN MY OWN PROPERTY in relation to pruning MY trees as and when needed to help avoid issues that could arise as a result of letting them grow unrestrained. I have quite a few large trees on my block, issues with overhanging branches/leaves in e.g. gutters or pool/ongoing problems with roots are common. I need to be able to manage that as and when needed. I don't trust you as a council to act in my best interest for trees on my property.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
148.3 You have not clearly articulated which trees are defined as weeds. A quick look on the internet did not provide the answer. You need to provide this information and a way for all residents to ascertain this. If you insist on pushing this through, how many people will seriously consider just cutting trees prior to the inception date down to avoid the issue? This will increase the administrative burden on the council and thus I expect it would see rates increase. I don't support the use of my rates in this manner. If you want to increase tree levels, plant more trees in public spaces you control.	Noted. The City has updated the Policy to refer to trees that are on a State or local weed register.

149	74 Waterford Ave Waterford
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
149.1 Oppose	Noted.
Please tell us why.	
149.2 Having to go through a long winded, costly and unpredictable development approval process for removing a tree on private property will just mean that people plant fewer and/or smaller trees. While the requirement might apply to only larger trees initially, homeowners will have no certainty that it won't be extended to smaller and smaller trees into the future. This will deter them from planting even smaller types of trees, particularly if there is a possibility they may be undertaking a development activity in the future (eg house extension, adding a swimming pool or shed, etc). This will work against the objective of having greater tree canopy across the south Perth area. Adding another layer of restrictions and compliance requirements to land subdivisions is also opposed given the land and housing shortage at present and the high costs of land development which will only be passed on to land buyers. Given the housing shortage Councils should be working to reduce red tape and development costs and timelines not increasing them.	Noted. Should Council adopt the Policy, it is recommended that Council waive fees associated with applications for development approval for tree damaging activity to a regulated tree.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
149.3 Scrap it.	Noted.
150	2/39 Bruce Street Como

Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
150.1 Support	Noted.
Please tell us why.	
150.2 With so many trees dying this last summer and autumn. we need to protect our existing canopy as far as possible.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
150.3 I am a strong supporter.	Noted.

151	12 Susan Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
151.1 Support	Noted.
Please tell us why.	
151.2 It is vitally important that we do not allow our local tree canopy to be reduced any more than its current appalling state. You already know the reasons - they provide shade and lower the ambient temperature through transpiration during our increasingly long & hot summers, which should reduce the amount of powered cooling that people use, which will reduce load on the grid and keep both cost & pollution down, plus they provide homes, food & shelter to birds and animals which increases bio-diversity in the area. They also serve to reduce the severity of storm winds.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
151.3 Hurry up and implement it.	Noted.

152	17 Lawler Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
152.1 Support	Noted.
Please tell us why.	
152.2 Having lived in South Perth for 50 years I have seen wholesale destruction of beautiful mature tree on blocks which have been rebuilt on or infill has taken place. The houses being approved now totally fill the block with house, let alone allow space for a garden or to replace the old trees which have been destroyed. People should not be allowed to refuse to have a verge tree on their crossover area.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
152.3 Please ensure in our increasingly hot summers that sufficient water is given to new plantings on the city.	Noted. In respect to street trees, the watering programme to new trees continues to be successful. Unfortunately, the seriousness of the drought the south-west experienced this summer has affected many trees regardless of the additional water programmes provided.

153	113 Hensman Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
153.1 Support	Noted.
Please tell us why.	
153.2 Trees are vital, valuable infrastructure in our suburbs. The benefits of trees go far beyond adding aesthetic beauty to our neighbourhoods. They provide a wide range of economic, social and environmental benefits.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

<p>CO2 absorption and oxygen production: One tree absorbs about 22 kg of CO2 per year and produces enough oxygen for two people. This contributes significantly to improving air quality.</p> <p>Soil stabilization: With its deep roots, a tree stabilizes the soil and prevents erosion. The roots improve the soil structure and increase the water retention capacity of the soil.</p> <p>Climate regulation: Trees reflect and absorb some solar radiation, which helps to cool the environment lowering max temperatures by 5-10°C. A single tree can have the cooling effect of ten air conditioners.</p> <p>Shade and protection: Trees provide shade and protection from UV radiation, which also cools the local microclimate. In summers shaded surfaces can be cooler than unshaded surfaces by 11-25°C, and evapotranspiration can lower peak temperatures by 5-10°C.</p> <p>Cloud formation and precipitation: Through evaporation, trees contribute to cloud formation and thus have a positive influence on the local microclimate and precipitation.</p> <p>Habitat: Trees provide critical habitat and food for a variety of animals, including birds, insects and rodents, thus promoting biodiversity.</p> <p>Health benefits: Trees are proven to reduces stress, improves physical and mental health and wellbeing. They protect residents from pollution-related diseases, premature death and boosts overall quality of health.</p> <p>Soil fertility: Leaves that fall to the ground decompose and serve as food for the soil. This promotes soil fertility and supports the growth of other plants.</p> <p>Nutrient cycling: Trees provide sugars to the mycelium in exchange for nutrients, which promotes soil life and supports ecosystem health.</p>	
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	<p>Air purification: Trees absorb dust and pollutants such as nitrogen oxides and sulphur dioxide, which significantly improves air quality.</p> <p>Aesthetics and community identity – Trees provide natural beauty that enhance our neighbourhoods and They promote quality of life, social equality and inclusion in cities. provide a sense of identity.</p> <p>Sound and visual protection: Trees can act as a natural sound and visual barrier, which is particularly beneficial in urban areas.</p> <p>Economic benefits: Urban trees increase property values and reduce energy costs by providing natural cooling.</p>	
153.3	In 2020 canopy cover across the City of South Perth was only 17% (Source: DPLH Urban Forest Dashboard). No data has been released by DPLH since then but canopy cover will certainly be much lower than 17% now given clearing for development and the many trees lost as a consequence of the Polyphagous Shot Hole Borer and our recent long hot summer. It will now be nearer 10% than 20%.	Noted.
153.4	It is also worth noting that the 17% canopy cover figure is skewed by the inclusion of the canopy within the Perth Zoo and the two golf courses. The actual canopy in and around South Perth homes, where it is most needed. is much less.	Noted.
153.5	30% canopy cover is internationally accepted as the minimum viable canopy cover to reap the many benefits of an urban forest, particularly cooling. WALGA adopted an updated Urban Forest Advocacy position in 2023 which includes "a minimum tree canopy target of 30% by 2040 for the Perth and Peel regions.	Noted. Refer to 'Achieving canopy targets' within the Consultation section of the report.
153.6	https://walga.asn.au/getattachment/Policy-Advocacy/Our-Advocacy-Positions/20231019-Advocacy-	Noted.

	<p>Positions-Manual-(ID-544606).pdf?lang=en-AU</p> <p>https://nbsi.eu/the-3-30-300-rule/</p> <p>https://www.melbourne.vic.gov.au/sitecollectiondocuments/urban-forest-strategy.pdf</p>	
153.7	80% of tree canopy loss in Perth occurs on private property. While the City steps up planting on public land, it cannot compensate for this loss.	Noted.
153.8	<p>WALGA President Karen Chappel made the following comments on the WALGA LPP template:</p> <p>"Local Governments have been at the forefront in addressing the loss in canopy cover through tree planting on verges, parks and other public areas, with support from the State Government through the Urban Greening Grant Program. "But planting new trees is not enough to stem the loss in canopy cover. We need to do more to preserve our existing mature trees. "The policy will provide a high level of protection for our most significant of our canopy trees, removing the need for Councils to get approval from the State Government on planning processes."</p>	Noted.
153.9	An LPP would not be anti-development. It would simply require all reasonable options to be exhausted before approval to remove a large healthy tree is removed. It would push architects and designers to look for better solutions that make room for our existing trees wherever possible. If a large tree is located so that it makes development unviable its removal could be approved. Similarly if a tree poses a serious safety risk to people or property its removal could be approved.	Noted. Refer to 'Liability and Safety issues' within the Consultation section of the report.
153.10	The LPP would only apply to large trees and it does allow for maintenance pruning.	Noted, however, the Policy provides for pruning to Regulated trees subject to prior approval having first being obtained.

153.11 Arguments regarding protection of private property rights are not valid given that Government already imposes a very long list of restrictions on private property for the benefit and safety of the wider community. E.g. design of buildings including heights and setbacks, use of buildings, noise limits, animal limits, pool and fence requirements, etc etc etc. What could be more important than provisions that seek to protect the livability of our suburbs for future generations?	Noted.
153.12 Significant Tree Registers on their own do not work. The Register that existed under South Perth LPS6 contained very few trees on private property (~10). The landowners who are the most likely to chop down large trees on their property without understanding the adverse impacts on their property and the community are the least likely to agree to trees on their property being registered.	Noted.
153.13 The City of South Perth community has expressed strong support for tree protection provisions. During LPS7 public consultation, 307 submissions, or 78.9%, were in favour of provisions. This is likely a record number of submissions received by the City of South Perth on a Planning Scheme. But unfortunately the Minister for Planning chose to ignore these submissions and the recommendation of the Council.	Noted.
153.14 Tree protections as proposed are mainstream in other Australian States and overseas. Communities there accept these protections as standard practice, life goes on and development continues. It's time for us to catch up.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
153.15 It is understood that the City has already procured canopy mapping for the LGA this year from Arbor Carbon so	The City has not procured data for the purposes of monitoring and enforcement of the Policy. Council has allocated funding

no additional expenditure should be required to determine the trees impacted by the Policy. The City FAQs indicate that the maximum penalties for breaching an offence provision under the Planning and Development Act 2005 are significant and are currently \$200,000 in the case of a natural person and \$1,000,000 in the case of a body corporate. However it is important to remember that these are maximum penalties. The penalties would be determined by a Magistrate if the City decided to pursue action and it is unlikely that for tree removal the penalty imposed would be anything like those quoted.	within the 2024/25 annual budget for this purpose should the Policy be adopted.
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154	Elizabeth Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
154.1 Oppose	Noted.
Please tell us why.	
154.2 Where similar policies have been implemented in other states, councils simply refuse applications to remove trees. This represents an erosion of private property rights. Trees are not a public good when they are on private property and the council has no fundamental right to control their removal. This policy will take away property owners' ability to manage their own assets - property that BELONGS TO THEM. Furthermore, the policy will have the following unintended consequences: It will lead to increased fire risk It will lead to damage to buildings, improvements, drains and sewers, with no automatic right for removal of trees that represent a threat from storm damage, or have outgrown their	Noted. Refer to 'Impinging on Private Property Rights' and 'Role of Council in regulating land' within the Consultation section of the report. The City does not consider that retention of regulated trees on private property would otherwise result in an increased fire risk. Only small portions of the City abutting foreshore areas are designated bushfire prone land. The City is in the process of preparing an Urban Greening Strategy and will be seeking public input into the document.

<p>space, or were planted too close to buildings, or are at the end of life or otherwise a danger It will lead to an aging tree population which is more susceptible to pests such as shot hole borer In contrast with this attempt to subvert private property rights, the council should be actively managing verge trees which are on council verges. Council currently has NO verge tree management plan. A good percentage of verge trees are at the ends of their lives and represent a danger to property and public safety, yet council refuses to even respond to enquiries let alone put a plan in place to gradually replace the population of dying and dangerous trees, and to trim the dead branches hanging above footpaths.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>154.3 Totally unnecessary, more government over-reach. Council needs to get back to the basics: picking up the garbage, fixing roads and managing footpaths and parks and libraries. You seem to be letting that slip lately.</p>	<p>Noted.</p>

<p>155</p>	<p>116 Hensman Street South Perth</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>155.1 Support</p>	<p>Noted.</p>
<p>Please tell us why.</p>	
<p>155.2 The trees in South Perth are essential for the area and the greater Perth area. South Perth has been known for its tree canopy but every time an old house is purchased all the trees on the land are cleared! This is a very short sighted approach to land development as the trees can be incorporated into</p>	<p>Noted.</p>

house design for the benefit of the home owners and the community.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
155.3 Very good idea as I find it upsetting to see all these mature trees cut down! We will already lose multiple trees from the borer so each tree should be considered important.	Noted.

156	116 Hensman Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
156.1 Support	Noted.
Please tell us why.	
156.2 Trees provide enrichment for both people and wildlife, as well as providing shade and a better aesthetic to the environment. Trees stabilise the soil and help preserve the water table. Their removal downgrades our living spaces and makes our suburb more an urban jungle rather than a green oasis.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
156.3 It is heartbreaking so see buildings demolished and every tree cleared to make way for a new house which fills the entire block. Too many have been lost already with grave consequences and we need to act now to preserve the trees we still have and encourage the planting of more trees.	Noted.

157	6 Lansdowne Road Kensington
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
157.1 Support	Noted.
Please tell us why.	
157.2 I support that dangerous trees should be attended to. However, I believe trees can be saved if they are regularly pruned. The trees on one side of my street, Lansdowne Road, are regularly pruned to save damage to the electricity wires. These pruned trees are very visibly much better and safer trees than those on my side of the street which are never pruned. There have a few dangerous trees removed in my street, all on the same side of the street, which I believe could have been saved by earlier pruning. PLEASE PRUNE ALL TREES AND SAVE MORE TREES FOR OUR ENVIRONMENT.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
157.3 Nil	Noted.

158	1/307 Canning Highway Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
158.1 Support	Noted.
Please tell us why.	
158.2 It's important that we preserve our established tree canopy.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
158.3 Nil	Noted.

159	113 Clontarf Road Hamilton Hill
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
159.1 Support	Noted.
Please tell us why.	
159.2 Trees are what makes cities liveable and attractive.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
159.3 Might need some kind of parameters on when and why a tree may need to be cut down.	Noted. The Policy contains general requirements where tree damaging activity is proposed to a regulated tree.

160	113 Clontarf Rd Hamilton Hill
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
160.1 Support	Noted.
Please tell us why.	
160.2 I'm concerned about climate change and Perth's dwindling tree canopy. To regulate temperatures we need to protect existing trees.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
160.3 Nil	Noted.

161	21 Norfolk Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
161.1 Oppose	Noted.
Please tell us why.	
161.2 Trees on private property should really only concern the owners themselves unless they are of danger to the public or to neighbouring properties. The	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.

draft policy is somewhat of an infringement of property owners rights.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
161.3 Tree retention in open park areas and on front verges makes sense as a way of preserving and maintaining trees but not on public property, especially in inner city suburbs where land is scarce.	Noted.

162	41 Norland Way Spearwood
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
162.1 Support	Noted.
Please tell us why.	
162.2 Property owners currently don't know all the options available in developing a block whilst retaining existing trees. This will help protect the tree while councils, property owners, and developers all work together for better outcomes. More trees in our blocks means less heat island effect in our suburbs.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
162.3 Due to the State government's legislation on increasing the housing densities in urban areas throughout WA, trees in backyard's are being cut down at an unprecedented rate to make way for subdivision. There is no process in place for accessing if trees can and should be retained in the subdivision proceed and planning.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
162.4 Many other states already have similar policies in place.	Noted.
162.5 It should be supported with no changes.	Noted. The City has recommended minor modifications to the Policy in response to submissions.

163	60 Brunswick Road Port Albany
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
163.1 Support	Noted.
Please tell us why.	
163.2 Trees are critical as our climate becomes hotter and drier.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
163.3 Nil	Noted.

164	1 Jack Ricketts Drive Ocean Beach
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
164.1 Support	Noted.
Please tell us why.	
164.2 Their ability to some extent to mitigate against the worst effects of climate change. Also if they are afforded protection it is an example to the community of the importance of green cover	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
164.3 Nil	Noted.

165	1 Jack Ricketts Drive Denmark
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

165.1	Support	Noted.
Please tell us why.		
165.2	It has leafy green feel in the area traditionally. More recently maximization of block use with larger homes, apartments and infilling the area has had an impact on tree numbers. As heat intensifies with the recording of hotter and a greater number of hot days the need for urban greening is acutely an issue that will help modify the effect in this area.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
165.3	Nil	Noted.

166	4 George Street Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
166.1	Support	Noted.
Please tell us why.		
166.2	Because the tree canopy is disappearing fast as neighbours develop savagely and cut all the trees the support our local Wildlife and keep our suburbs cool.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
166.3	My neighbours just cut two massive trees before this policy is approved, just in case it gets supported.	Noted. The City has commented on the risk of pre-emptive tree removal within the report.

167	127 Angelo Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
167.1	Support	Noted.

Please tell us why.	
167.2	<p>I support the protection of trees on private property- this is becoming more and more urgent with our denser development of the COSP. Trees can help to offset the damage that urban development can do. Also in our beautiful suburb, old and mature trees play a significant role in the ambience of the area. They should be protected and developments modified to fit the trees, not the other way around!!</p> <p>Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.</p>
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
167.3	<p>Yes, I believe that it doesn't go far enough to protect trees and our tree canopy. There are many trees around the boundaries of existing blocks which don't meet the requirements of the draft policy to be protected. I would like to see all boundary trees retained. The trend now is to plant minimal trees, usually of a smaller 'ornamental' nature which will take many years to provide a canopy, if ever. Trees which exist on properties should be kept. Developments should be forced to do so, no loop holes. No excuses. No ways around this. We have so many established trees, lets protect them!</p> <p>Noted.</p>

168	22 Forrest Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
168.1 Oppose	Noted.
Please tell us why.	
168.2	<p>I do not believe it is the right of the Council to stop landowners from removing trees on their own property.</p> <p>Noted. Refer to 'Role of Council in regulating land within the Consultation section of the report.</p>

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
168.3 Nil	Noted.

169	99A Forrest Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
169.1 Support	Noted.
Please tell us why.	
169.2 For the reasons you provided. The importance of urban canopy in this time of climate warming.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
169.3 It sounded fair to me. However if trees are young and not yet reached their potential that needs to be taken into account.	Noted. It is unlikely that immature trees will meet the criteria of a regulated tree for which the Policy would otherwise apply.

170	40 Market Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
170.1 Oppose	Noted.
Please tell us why.	
170.2 The Policy appear restricts and penalises Property Owners from developing and maintaining their properties. Further, those Property Owners who have either purchased a cleared or actively historically cleared trees are not required, under this policy, to re-instate\re-establish canopies to equally contribute to the City's urban tree canopy, placing an unequitable burden upon those who have maintained canopies for the	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.

<p>benefit of those who haven't. Generally, I believe this is an unnecessary invasion to persons property rights that is not required, and is currently adequately managed through societal norms without further invasion or instruction.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>170.3 The City should, if it wishes to determine which trees are maintained within a private property for the benefit of the Community, use community funds to maintain those canopies and any negative impact the trees may have upon those properties. Additionally, the City should compensate Property Owners for any devaluation in their property as a result of current or potential investors being restricted in any future development.</p>	<p>The City can consider incentives (including financial) for tree retention and provision as part of the Urban Greening Strategy, which will be the subject of public consultation in future.</p> <p>Increase or decrease in property values is not a material planning consideration.</p>

<p>171</p>	<p>12 Norton Street South Perth</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>171.1 Support</p>	<p>Noted.</p>
<p>Please tell us why.</p>	
<p>171.2 Agree with proposal</p>	<p>Noted.</p>
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>171.3 No</p>	<p>Noted.</p>

<p>172</p>	<p>4A York Street South Perth</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>172.1 Oppose</p>	<p>Noted.</p>

Please tell us why.	
172.2 Planning policy provides for building density ranging from R15 through to R60 for my property. To have a tree retention policy on private property that has no regard for zoning seems to be counter productive and naive. The way the policy reads at the moment all landowners thinking of redevelopment should remove trees now to ensure they are not a restriction at a later date on the extent of redevelopment value that would otherwise be available under current zoning.	Noted. Refer to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
172.3 Maintenance pruning says less than 10% or 100mm. These numbers need to be doubled/tripled and how are 10% and 100mm justified?	Noted. The definition of maintenance pruning is based on the minor pruning definition in the <i>Urban Forest Act 2023</i> (ACT).
172.4 In General Requirements 6.1 it mentions Arborist Report. If Council wants this tree retention policy, Council should arrange a professional arborist service that provides a report to the landowner and Council whenever Council wants an arborist report as part of an application.	It is not considered appropriate for the City to procure arborists reports on behalf of applicants, as the City must remain independent in its statutory assessment of the subsequent development application, including the arborist report.

173	Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
173.1 Oppose	Noted.
Please tell us why.	
173.2 I am a strong supporter of green spaces, both on public land and private property. However, I am opposed to the draft local planning policy – tree retention, for a number of reasons, which can be summarized as follows:	Noted.

173.3	1). The stated purpose of the policy is "To encourage and facilitate the protection of trees and to maintain and enhance tree canopy". However, the mechanisms of the policy are focused on enforcement, not encouragement. Where is the encouragement or facilitation when the decision making is completely taken away from the homeowner?	Noted. Despite the benefits of tree retention, removal of mature canopy trees on private property has continued to occur. Whilst the City would seek to promote the benefits of tree retention and provide community education, regulation of trees on private property via a local planning policy provides the ability to enforce the Policy provisions if adopted by Council.
173.4	2). I fear that the regulation will be counterproductive to improving retention as it may encourage residents to remove any existing trees before they reach a regulatable size. Further, it would discourage new planting, as it will disincentivize people from planting any new trees on their property that could grow to a regulatable size. I would certainly consider planting a larger tree on my property, but not if I was to be burdened with this regulation in the future.	Noted. Whilst the Policy is seeking to retain mature canopy trees that meet the definition of a regulated tree as contained in the Policy in the first instance, it is acknowledged that an unintended consequence may be such that landowners plant smaller species of trees.
173.5	3). The cost to make a development application, with the accompanying arborist report and/or structural engineers report would be excessive	Noted. Should Council adopt the Policy, it is recommended that Council waive fees associated with applications for development approval for tree damaging activity to a regulated tree. The cost of preparing an arborist report or structural engineers report in support of an application to maintain/ remove a regulated tree would be borne by the applicant.
173.6	4). Who is responsible and/or liable should the regulated tree cause harm to people or damage to property, particularly with the high entry level to make an application?	Refer to 'Liability and Safety issues' within the Consultation section of the report.
173.7	5). Where has the need for such a policy been derived? I have lived in the city of South Perth for well over a decade and the most pressing issue that I see in relation to trees is the danger from falling branches from existing large trees within the city's public places.	The City has prepared the Policy in response to a Notice of Motion from an Elected Member. The matter of tree retention on private property had also been raised at the Electors' General Meeting 2024.
173.8	6). The inclusion of "Allergies" as a justification that would not be	Whilst the City acknowledges the serious nature of some allergies, historically, minor

	supported undervalues the seriousness and debilitation of some allergies. Prioritizing the health of trees over the health of residents within their own homes is inappropriate.	allergies have been used as justification for removal of street trees. This criteria has therefore been included in the Policy to specify that in most circumstances, regulated trees would not be supported for removal on this basis. As with all applications to remove regulated trees, the City could consider each application on its merits having regard to the requirements of the Policy if adopted by Council.
173.9	I am an advocate for green spaces, feel that it is already one of the endearing features of the South Perth area and would love to see more trees planted and maintained, including within the city's public spaces. However, for the reasons outlined I feel that this policy is an unnecessary, regressive overreach and will run counter to achieving its stated objectives. Thank you for your time and consideration.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
173.10	Please consider revising the stated criteria on the yoursay web page. It does not mirror what is actually in the draft policy and, as it is missing the required "and/or", it currently reads that any tree that is of a species that is not included on State or local area weed register is a regulated tree (i.e. it only has to satisfy this one criteria).	Noted. The Policy does not apply to any tree on a State or local area weed register.

174	25 Davilak Street Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
174.1	Support	Noted.
Please tell us why.		
174.2	Maintaining well established trees and limiting development that will progressively see the loss of large trees	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

is importance to be environmentally and socially responsible. Trees have significant impact on not only the natural ecosystem but also human well being.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
174.3 No	Noted.

175	70 Roebuck Drive Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
175.1 Support	Noted.
Please tell us why.	
175.2 With climate change and increasing temperatures, larger urban trees will help suburbs stay cooler. They also are important for our well being. Large trees offer important habitat to our wildlife.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
175.3 Encouraging developments to keep trees and design building around trees is also important. I am concerned about the trunk diameter and wonder if it is not protecting trees with multiple trunks and significant trees that tend to have narrower trunks.	Noted. Should Council adopt the Policy, the City can review implementation to determine whether any modifications to the definition of a regulated tree are required to ensure the objectives of the Policy are achieved.

176	13b Howard Parade Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
176.1 Support	Noted.
Please tell us why.	

176.2	Trees are important for animal habitat, hear reduction and general beauty of the suburbs.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
176.3	Nil	Noted.

177	27a Axford Street Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
177.1	Support	Noted.
Please tell us why.		
177.2	Maintaining and expanding our tree canopy is a high priority for me living in this area now and into the future. Is support even stronger protections and more compulsory very planting in the future. I'm aware of many eastern states areas that have had similar policies for a long time and things still manage to get built.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
177.3	Thanks for continuing to look at ways to improve our trees and residents.	Noted.

178	5 Trumper Road Manning	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
178.1	Support	Noted.
Please tell us why.		
178.2	Tree retention provides oxygen, shade, habitat to birds and insects, absorbs carbon and cools the suburbs.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

178.3	No.	Noted.
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179	11A Elderfield Rd Manning	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
179.1	Support	Noted.
Please tell us why.		
179.2	Trees must be a priority.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
179.3	Glad there is one.	Noted.

180	1B Brandon Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
180.1	Support	Noted.
Please tell us why.		
180.2	Nil	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
180.3	Nil	Noted.

181	36 Colline Street Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
181.1	Neutral	Noted.
Please tell us why.		
181.2	When we moved into our home 50+ years ago there was a Norfolk Island	Noted.

<p>Pine in the back yard. We loved it. Magpies loved it and nested some years. Kensington backyards are small, and over the years the branches stretched almost from one boundary fence to the other, also it accumulated a lot of dust and we were forever raking up the dropped ""leaves"". Finally, regretfully we decided to have it removed. It cost us \$1000.00 this was prior to GST. We now have prunus trees and an olive tree and a garden. It would have been awful, long term, if we had not been able to have it removed.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>181.3 No doubt there are some beautiful trees that should be retained, they are such a beautiful asset.</p>	<p>Noted.</p>

<p>182</p>	<p>70 Roebuck Drive Salter Point</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>182.1 Support</p>	<p>Noted.</p>
<p>Please tell us why.</p>	
<p>182.2 Nil</p>	<p>Noted.</p>
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>182.3 Nil</p>	<p>Noted.</p>

<p>183</p>	<p>4 Trumper Road Manning</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>183.1 Support</p>	<p>Noted.</p>
<p>Please tell us why.</p>	

183.2	Keep the trees! Shade. Temperature control and canopy. Habitats for local wildlife, beautiful nature that takes decades to grow. Just look at new estates with no mature trees-hot and artificial. Keep the trees and look after them well!	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
183.3	Nil	Noted.

184	219A Manning Road Waterford	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
184.1	Support	Noted.
Please tell us why.		
184.2	It is important to me to keep larger trees on private property, especially natives, that attract native wildlife. Many of the larger trees on private property around me have been cut down. Many of my neighbours are landlords and rent their houses to others, or the properties have been redeveloped with little vegetation to replace most of what was removed. The area is becoming barren, hotter and I no longer see as much wildlife around.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
184.3	I don't think the Local Planning Policy has any provision for what happens if someone removes a tree that shouldn't be removed. In section 4. Objectives of the LPP - Tree Retention: I think there should be another clause added that outlines what fines will be applied for removing a Regulated Tree. In the past a flat rate fine has meant that wealthier individuals just go ahead and take the fine, because they	Should Council adopt the draft Policy, the provisions detail that tree damaging activity to a regulated tree (including tree removal) is considered development, and it would therefore become an offence under the <i>Planning and Development Act 2005</i> to undertake such works without having first obtained development approval. The maximum penalties under the <i>Planning and Development Act 2005</i> are significant and are currently \$200,000 in the case of a natural person and \$1,000,000 in the case of a body

can afford to. The fine should be income/asset based.	corporate, with the potential for additional daily penalties in the case of ongoing non-compliance.
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185	118 Forrest Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
185.1 Oppose	Noted.
Please tell us why.	
185.2 I think you should be able to decide what to do in your own back yard.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
185.3 Do not support this	Noted.

186	82A Lockhart Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
186.1 Support	Noted.
Please tell us why.	
186.2 I have only lived in Como for 2 years but have seen a disturbing number of mature healthy trees cut down for infill and development. With such a hot dry summer this year, shade is crucial to manage temperatures and keep the beauty of the area, as well as habitat for fauna.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
186.3 No	Noted.

187	5 Anthus Corner Waterford
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
187.1 Oppose	Noted.
Please tell us why.	
187.2 A tree on land that I have purchased is my tree to do as I please. This will probably also result in people not planting trees because of the hurdles they would have to jump through should that tree not suit their needs in the future.	Noted. Refer to 'Role of Council in regulating land within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
187.3 Nil	Noted.

188	64 Mill Point Road South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
188.1 Support	Noted.
Please tell us why.	
188.2 Perth has the lowest tree canopy coverage of all Australian capital cities and continues to lose mature trees as infill development increases.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
188.3 Please approve it. Please include an option on question 9 for people who study, work or have businesses in in the City of South Perth.	Noted.

189	139 Lansdowne Road Kensington
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
189.1 Neutral	Noted.
Please tell us why.	
189.2 Unless the council is going to provide a financial contribution to the maintenance and ongoing care of any large tree on private property, such as providing rebates from rates to help with the cost of lopping branches or maintaining a manageable height and canopy, then I would see no point whatsoever in the interference by council in the regulation of trees on private property. That said, as Council has a difficult time even properly trimming and maintaining existing verge trees in Kensington, the fact that South Perth Council could suggest managing or overseeing any trees on private property is laughable!	Noted, however, landowners are already responsible for the maintenance of trees on private property. Refer to 'Role of Council in regulating land within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
189.3 No.	Noted.

190	7/51 park street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
190.1 Oppose	Noted.
Please tell us why.	
190.2 Makes landowning in south perth less attractive. Unnecessary regulation that impacts the wrong people. I rent in Como but would like to buy in the area in the future. But not if there is a tree policy.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
190.3 Nil	Noted.

191	47 Eric Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
191.1 Support	Noted.
Please tell us why.	
191.2 Need to make sure large trees are protected for biodiversity.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
191.3 Nil	Noted.

192	9/12 Forrest Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
192.1 Support	Noted.
Please tell us why.	
192.2 The protection of our canopy coverage, the heritage, the habitat value... just a few of many.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
192.3 Nil	Noted.

193	Norfolk Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
193.1 Oppose	Noted.
Please tell us why.	
193.2 We have way too much interference by all levels of government in matters	Refer to 'Role of Council in regulating land within the Consultation section of the report.

that should be in the control of the individual who owns the property. We don't pay rates to be even more over-regulated. The money paid in rates should be used to provide services to ratepayers, not to fund even more unnecessary regulation and bureaucracy. If you want more trees, plant them down on the foreshore where there's room and they're not in the way. Stop planting them in the middle of streets and roundabouts creating even more work and obstruction to traffic.	The City will continue to plant trees on public land subject to budget allocations.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
193.3 Stop wasting ratepayer money.	Noted.

194	32A Hinderwell Street Scarborough
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
194.1 Support	Noted.
Please tell us why.	
194.2 Because we are in a tree canopy crisis with more and more trees being removed on private property in the name of "development". We need more urban tree canopy for cooling, biodiversity and habitat, as well as making our city more appealing to live in.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
194.3 Nil	Noted.

195	31 Angelo Street South Perth
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
195.1 Oppose	Noted.
Please tell us why.	
195.2 People should be able to decide what they want to do with their own property.	Noted. Refer to 'Role of Council in regulating land within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
195.3 Rather than restrict encourage owners to plant trees that are on the register by giving discount vouchers to nurseries that supply these types of plants.	Noted.

196	173 Mill Point Road South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
196.1 Support	Noted.
Please tell us why.	
196.2 During the last 5 years I have seen so many older houses with good tree canopies sold and then the block is stripped, nothing is left behind. my garden in Spring is throbbing with birds looking for trees to nest in. My patio and garden becomes a no go area, with humans bombed by our small native birds protecting their nests. Why are we allowing this to happen. As well last year weeding had to be abandoned as late in spring the tiniest nest was found on a very small palm in the middle of the weeds. We all watched the progress and 4 baby birds were finally allowed to fly the nest.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
196.3 Nil	Noted.

197	36 First Avenue Claremont
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
197.1 Support	Noted.
Please tell us why.	
197.2 Perth is in tree canopy crisis.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
197.3 Great work!	Noted.

198	36 Harford Avenue Viveash
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
198.1 Support	Noted.
Please tell us why.	
198.2 We are in a Tree Canopy Crisis.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
198.3 It makes sense and it's crucial to allow existing trees to remain intact where possible.	Noted.

199	43 Waverley Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
199.1 Support	Noted.
Please tell us why.	
199.2 Tree keep our suburb cool, green and pleasant. They are part of the character and charm of South Perth.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

We are noticeably losing tree cover and as developed density increases so our tree cover is lost.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
199.3 This is long overdue. We are well behind other states and countries in protecting our urban tree cover. I read that Perth has the lowest tree cover of any Australian capital already and we should be taking measures to protect what we have left.	Noted.

200	15 Conochie Crescent Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
200.1 Oppose	Noted.
Please tell us why.	
200.2 The concept of a REGULATED tree should be regarded as dated and inappropriate in current times, with regard to general amenity and climate change. Instead, there should be a significant and entirely appropriate PRESUMPTION that trees should remain UNLESS (dot points as appropriate)	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
200.3 Nil	Noted.

201	Unit 3,44 Ranelagh Crescent South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
201.1 Support	Noted.
Please tell us why.	

201.2	I love the coolness & peaceful feeling tress provide. The birds using tress for food, shelter, nests and just sitting in chirping is amazing.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
201.3	I'm hoping it will enable strata communities such as where we live, be able to register trees to stop them being unnecessarily cut down.	Noted, however, the Policy does not provide for the creation of a register of trees, rather, any tree that meets the definition of a regulated tree as prescribed in the Policy would require development approval prior to being pruned or removed.

202	34 Fourth Avenue Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
202.1	Support	Noted.
Please tell us why.		
202.2	We need more trees in South Perth. Tree retention is a good start, but we also need to plant more. The trees add value to the neighbourhood both in a financial and health/wellbeing sense.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
202.3	I have concerns that developers are going to use the "risk to safety from fallen limb" to exploit the plan. Obviously any tree could be claimed to be a risk to safety, as there is not a validated assessment to determine the likelihood of limb failure the vast majority of the time. I am not that this is a beneficial addition. Mortality and morbidity from trees is exceptionally rare.	Noted. Refer to 'Liability and Safety issues' within the Consultation section of the report.

203	57 Dyson Street Kensington	
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
203.1 Support	Noted.
Please tell us why.	
203.2 It is vitally important to maintain the tree canopy in our urban areas for many reasons. Maintaining habitats for bird and animal life, the cooling nature of trees to our immediate environment, the aesthetics of mature trees in our neighbourhood and the need for green for mental health and well being. And because they are beautiful!	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
203.3 Encouraging landowners/developers to keep as many trees on a property when redeveloping, building or renovating will increase interesting streetscapes and living spaces for people, enhancing and enriching daily life.	Noted.

204	5a Luffingham Street Melville
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
204.1 Support	Noted.
Please tell us why.	
204.2 Councils have already agreed in principle for the need for 30% canopy. It can’t be achieved on public land alone. So many benefits to keeping a neighbourhood cool, providing an ecosystem and increasing property values. Other cities such as Paris are paying for expensive programs of retrofitting trees. We just have to keep	Noted. Refer to the ‘Achieving canopy targets’ within the Consultation section of the report.

the ones we have and save the expense , putting thoughts into future replacement and adapting tree choice native or not to out changing climate.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
204.3 It can't come soon enough I am not a resident of South Perth but I need your LPP to make my city implement their own. Also you have already agreed to similar strategies in your recent reforms that were not passed by the Minister.	Noted. Whilst Council adopted provisions relating to tree protection on private property when considering draft Local Planning Scheme No.7, these were ultimately removed by the Minister for Planning in approving the Scheme.

205	20 Harvey Street Mosman Park
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
205.1 Support	Noted.
Please tell us why.	
205.2 Canopy affects everyone. (May create more innovative and environmental buildings.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
205.3 The science says more trees less heat and all the problems that go with it., South Perth is becoming a lot of glass! Perhaps new tall buildings should have to have cool roof gardens. My suburb is being changed irrevocably by loss of canopy.	Noted.

206	16 Irvine Street Peppermint Grove
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
206.1 Support	Noted.

Please tell us why.	
206.2	<p>Trees provide shade, food and habitat for animals and birds, reduce heat / combat the effects of the heat synch, support good mental health, beautify our suburb, add value to our real estate - and take a long time to grow and therefore to replace. If we lose our mature trees, then it will take hundreds of years to replace their canopy. We don't have time to waste if we want to combat global warming.</p> <p>Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.</p>
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
206.3	<p>I'm concerned that it hasn't gone far enough. We are rapidly losing tree canopy on private land. Trees aren't protected in this State. Our targets should be set for 50% urban tree canopy cover. The only way we can achieve this is to protect even more trees on private properties.</p> <p>Noted. Should Council adopt the Policy, the City can review implementation to determine whether additional/ modified provisions are required.</p>
206.4	<p>If South Perth can do this then it helps other Councils to set similar standards. We need good Councils to lead our community.</p> <p>Noted.</p>

207	2255 Gill Street Parkerville	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
207.1	Support	Noted.
Please tell us why.		
207.2	We need to protect trees. Trees provide oxygen, shade and beauty and cool suburbs in summer. Native trees like Jarrah and Marri take 150 years of growth before they can develop nesting hollows which are vital for breeding for many of our native species.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

207.3 Nil	Noted.
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208	u305. 53 Labouchere Road South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
208.1 Oppose	Noted.
Please tell us why.	
208.2 I do voluntary garden work for elderly, disabled and widowed. Quite occasionally I find trees, particularly eucalypt, that shed branches after dry spells. Breaking neighbours roofs. I've found poisonous trees, and many trees that have outgrown backyards. Trees with prickles that make a backyard unsuitable for grand children.	Noted.
208.3 Many such may find employing an arborist a difficult task. with some expense. Most of my clients are on a pension.	Noted. The Policy does not prescribe that an arborist report would be required to be submitted in support of an application, rather, the recommendations of an arborist report could be used to justify tree damaging activity to a regulated tree. The City would take a pragmatic approach to information requirements, and where photographic evidence is provided related to the pruning/ maintenance of trees required, will consider this information along with site investigations in assessing applications.
208.4 I will invariably replace a tree with a suitable replacement. Often a native fruit tree.	Should Council adopt the draft Policy, the provisions detail that tree damaging activity to a regulated tree (including tree removal) is considered development, and it would therefore become an offence under the <i>Planning and Development Act 2005</i> to undertake such works without having first obtained development approval.
208.5 I remember one case where a young family moved into a house and the street light shone through the branches, which made a monster	Noted.

	shadow on the kids bedroom. I'm not in the business of frightening small children.	
208.6	Having disproportionate sized trees in modest backyards is not very helpful. There are numerous trees that are magical - often jacaranda - which should be encouraged - regardless of size.	Noted.
208.7	I'd support a proposal that was helpful - such as a tree advisor - rather than forbidding by prohibition. Helpful advice may mean more healthy suitable trees.	The City agrees that education and advice to landowners as to the management of trees on private property is another appropriate mechanism to protect trees, however, this Policy is proposing to regulate tree damaging activity.
208.8	I've had requests to reduce backyard trees to evade the limits set before any such proposal is enacted. The worst hard case that I can imagine is an elderly person who develops allergy in their dotage, and I cannot replace the tree with something better. I'd support something that promotes native wildlife and birds at the expense of exotics. I see the proposal as green gone mad.	The City acknowledges that pre-emptive removal of trees may be an unintended consequence of the Policy. Whilst native vegetation is preferred, the Policy seeks to retain canopy, which is also provided by exotic species.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
208.9	Promotion beats prohibition. The proposal will encourage the practice of surreptitiously destroying trees.	Noted.

209	14 Le Var Parkway Belmont	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
209.1	Support	Noted.
Please tell us why.		
209.2	It makes sense in a constantly drying climate.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

209.3	I wish other local authorities to follow your lead.	Noted.
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210	Nderson East Fremantle	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
210.1	Support	Noted.
Please tell us why.		
210.2	A healthier planet more interesting streetscape.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
210.3	Nil	Noted.

211	9 Armstrong Road Applecross	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
211.1	Support	Noted.
Please tell us why.		
211.2	Too many mature trees are being cut down for developments of large homes with little or no garden. This is decimating the tree canopy and habitat for wildlife. Developers often insist on levelling the entire block however buildings can coexist with mature trees as has been proven in other countries. I believe mature native trees should be heritage listed and preservation orders made for them to retain biodiversity and habitat.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
211.3	I fully support a tree retention policy on private land. It's about educating	Noted. The inclusion of trees in the Local Heritage Survey, which is used to inform the

people on the positives of having a mature tree on your, that residents have a civic duty to retain trees and to promote the value of trees rather than the inconvenience of leaf fall, fears of fallen branches and invasive tree roots.	Heritage List must be based on cultural heritage significance, rather than amenity or environmental value.
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212	1 Meyer Court Woodvale
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
212.1 Support	Noted.
Please tell us why.	
212.2 I support the protection of large trees as it is becoming more difficult to plant large trees with new developments being so small and large trees being unable to be planted so close to a home in these new developments. We need to work plans around retaining the tree. Large trees will provide a greater benefit to be retained than removed.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
212.3 Nil	Noted.

213	55 Park Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
213.1 Support	Noted.
Please tell us why.	
213.2 Canopy retention is vital	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
213.3 Agree 100 per cent	Noted.

214	7b Unwin Crescent Salter Point	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
214.1	Oppose	Noted.
Please tell us why.		
214.2	A bureaucratic encumbrance on private property. Pressure from a lobby group of people who have their own agenda. I can see this discouraging people from growing trees.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
214.3	I love trees, but I don't want them to be made part of a bureaucratic nightmare and extra charges.	Noted.

215	2 76 Gardner Street Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
215.1	Oppose	Noted.
Please tell us why.		
215.2	I strongly object to Jacaranda trees being protected in any form. They are not a native of Australia. They clog our gutters and can cause damage to foundations.	Noted. The Policy extends to non-native trees based on criteria, unless the tree is a noxious weed. Should a Jacaranda tree meet the criteria for a regulated tree as outlined in the Policy, development approval would be required to prune or remove the tree.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
215.3	I am certainly in favour of retaining trees where possible and practical.	Noted.

216	3 Pitt Street	
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	Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
216.1 Support	Noted.
Please tell us why.	
216.2 We need to maintain a mature tree canopy to reduce heat in our suburbs, and increase suburb value.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
216.3 Nil	Noted.

217	7 Lawrence Street Bayswater
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
217.1 Support	Noted.
Please tell us why.	
217.2 We can't achieve the necessary increase in urban canopy without acting to retain more established trees on private land.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
217.3 Nil	Noted.

218	5B Cullen Street Shenton park
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
218.1 Support	Noted.
Please tell us why.	

218.2	We need tree canopy for a more liveable city. Moderate our temperatures . A more pleasant environment to walk and ride and drive. An unshaded city is very hot and unpleasant.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
218.3	No	Noted.

219	187b Riverton Drive, Shelley South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
219.1	Support	Noted.
Please tell us why.		
219.2	Nil	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
219.3	Nil	Noted.

220	65 Ewing Road Allanson	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
220.1	Support	Noted.
Please tell us why.		
220.2	Perth has one of the lowest tree canopy coverage in the country, Perth is becoming a heat island. We need more shade.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
220.3	Retention of trees will also improve biodiversity in the suburbs, which would be good to see.	Noted.

221	98 Forrest Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
221.1 Support	Noted.
Please tell us why.	
221.2 Help cool our environment. Advanced trees are essential for this, and a uniform policy is required for retention of these trees.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
221.3 Nil	Noted.

222	23a David Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
222.1 Support	Noted.
Please tell us why.	
222.2 Mature trees provide food and habitat for many species. Cooling affect on surrounding areas reduces need to use fossil fuel for powering air conditioners. Trees provide creative play for children, swings, tree house, climbing, picnics, nature observation.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
222.3 Home owners should be encouraged to plant native trees which provide biodiversity in wildlife and encourage more wildlife into suburbs. City of SP should provide free advice to home owners and contribute financially to the maintenance of mature trees on private property.	The City is available to provide advice with respect to tree species for planting on private property. Landowners are responsible for the cost of maintaining trees on private property.

223	2/58 Henning Crescent Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
223.1 Support	Noted.
Please tell us why.	
223.2 Tree canopy is constantly reducing and mature trees requires to support bird life.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
223.3 Nil	Noted.

224	22 Slalom Drive Wembley Downs
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
224.1 Oppose	Noted.
Please tell us why.	
224.2 Private property rights. Policy will ENCOURAGE tree removal in first instance. Policy will discourage property owners to develop, limiting important housing supply Other people have no rights to decide what is on my property, that includes trees Distinction of private property rights and public rights is essential to free society.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report. The City acknowledges that pre-emptive removal of trees may be an unintended consequence of the Policy.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
224.3 Private property rights Policy will ENCOURAGE tree removal in first instance Policy will discourage property owners to develop, limiting important housing supply. Other people have no rights to decide what is on my property, that includes trees Distinction of private property rights	Noted. Refer to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report. The tree size was chosen to align with the medium tree size contained within the Residential Design Codes, being 6.0-9.0m for

and public rights is essential to free society Slippery slope - first 8m, then 7m. Why not 6m?	canopy diameter and 8.0-12.0m for tree height.
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225	1/45 South Perth Esplanade South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
225.1 Oppose	Noted.
Please tell us why.	
225.2 The draft Local Planning Policy – Tree Retention imposes unnecessary restrictions and burdens on landholders. It increases the red tape involved with managing one's property and increases the cost of local government administration. It further curtails the freedom of individuals to manage their own affairs. Citizens today are well educated and understand how they need to interact with nature. The citizens I know would carefully weigh the options, advantages and disadvantages associated with a potential tree removal.	Noted. Whilst the City acknowledges that many landowners maintain and retain mature trees on private property, as redevelopment and infill development is occurring, the City is experiencing loss of mature trees on private property.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
225.3 Six pages to say very little but enough to stifle individual thoughts with many hours spent developing, workshopping, surveying, assessing surveys, finalising the draft, seeking approval, then publishing, advertising, managing and policing the policy makes me think our time and energy can be better spent on real issues. Such as homelessness.	Noted.

226	6 Mulberry Grove Eaton
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
226.1 Support	Noted.
Please tell us why.	
226.2 We need to do what we can everywhere to halt climate change.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
226.3 Nil	Noted.

227	144 Planet Street Carlisle (previously South Perth resident)
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
227.1 Support	Noted.
Please tell us why.	
227.2 We absolutely need better protection of existing trees. Planting new trees is terrific but they can't grow fast enough to replace the canopy and ecosystem services that have been and are being lost.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
227.3 South Perth is lucky to be visited by endangered black cockatoos, the pines at Curtin and Collier are major roost and feeding sites. But the pines were originally planted around the 1930s and can't last forever. They need to be protected and have new ones planted to replace the existing pines when they come to their end of life. It was very disappointing to see the City of South Perth blatantly and publicly spreading misinformation about the importance of pines as a food source for Carnaby's. More just be done to prefect vehicle collisions on the major	Noted. The City of South Perth received a response from Murdoch University on 19 April 2024 in relation to an article titled 'The Cockatoos of Collier Park Golf Course' which was published in mySouthPerth magazine in December 2023. In the interest of transparency and to clarify information in the article the City has published the correspondence on its website.

arteries around the pines, including reducing speeds if need be. Signage is unfortunately proving ineffective. The City of South Perth should work with neighbouring local governments and WALGA to progress creation and management of wildlife corridors, of which tree protection is one part.	
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228	80 Lansdowne Road Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
228.1 Support	Noted.
Please tell us why.	
228.2 Absolutely agree with tree protection, we need more trees and more tree canopy.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
228.3 Please provide tree protection, without tree protection the tree canopy will continue to decline, we need more trees.	Noted.

229	9 Linden Street Dianella
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
229.1 Support	Noted.
Please tell us why.	
229.2 Trees provide natural cooling and habitat for our native species and privacy for neighbours.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
229.3 Nil	Noted.

230	113 Hensman Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
230.1 Support	Noted.
Please tell us why.	
230.2 A thriving urban forest is critical for the liveability of our suburbs, especially in a warming climate. Trees cool our suburbs Trees provide habitat and food for our wildlife Trees help to combat climate change Trees clean our air and water quality Trees improve our physical and mental health and wellbeing Trees reduce stormwater runoff and erosion Trees make our suburbs beautiful Trees reduce energy costs in our homes Trees increase our property values And so much more. Trees are critical urban infrastructure. We need to catch up with the eastern states and stop allowing the clearing of large trees without proper consideration, before its too late. We have a canopy crisis and every day more of our precious trees are lost for no good reason. Thank you South Perth Councillors for continuing to lead the way. I wholly support this Policy and call on you to ensure that it is adopted for future generations.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
230.3 Nil	Noted.

231	1 Gairloch Street Applecross
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

231.1	Support	Noted.
Please tell us why.		
231.2	We are in a Climate Emergency and every tree absorbs and stores CO2.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
231.3	Nil	Noted.

232	14 Springpark Trail Ballajura	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
232.1	Support	Noted.
Please tell us why.		
232.2	Keeping existing tree canopy should be a priority for climate, wildlife and aesthetics. Too many trees which have taken decades to grow have been cut down indiscriminately and this lost canopy will take generations to replace!	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
232.3	Nil	Noted.

233	50 Elizabeth Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
233.1	Support	Noted.
Please tell us why.		
233.2	I have lived in South Perth for over 20 years and have seen way too many trees being chopped down. We need trees for shade for bird life and for our mental health.	Noted.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
233.3	It would be fantastic for our council to actually act on preserving trees for our future. Trees take years to mature so it would be wonderful for the council to police our mature trees and keep them safe.
	Noted.

234	5/7 Tate Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
234.1	Support
	Noted.
Please tell us why.	
234.2	Large trees give us the tree canopy that we need to cool our suburbs. It takes years for a tree to mature to provide shade. A large tree cannot just be replaced by a smaller one.
	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
234.3	We need to save established trees our tree canopy is less than 20% our suburbs are getting hotter.
	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
234.4	Development is not just a reason to take down a tree.
	Noted.
234.5	Make this policy a permanent policy
	Noted.

235	65 Gwentyfred Road Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
235.1	Support
	Noted.
Please tell us why.	

235.2	Temperatures are rising - we need to cool down our suburbs. Also sustainability.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
235.3	Stop allowing people to cut down trees everywhere. Give home builders incentives to keep trees. Every new build needs to be told to plant minimum 5 trees at least.	Noted. The Residential Design Codes require minimum tree planting based on the area of the lot.

236	122 Lockhart Street Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
236.1	Support	Noted.
Please tell us why.		
236.2	Temperatures are rising. It is scientifically demonstrated that greater tree canopy reduces local temperature. Maintains as many trees as possible locally is key to reducing extreme summer temperatures.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
236.3	Ideally maintenance of existing trees on properties should be mandated and working existing trees into future developments considered. Perhaps a metric of green space per m2 of property should be considered and maintenance costs for pensioners and low income folks could be subsidised by council and other residents. The city already has good uptake of recycling and other environmental projects, let's lead the way! Compassionate communities are the future!	The Residential Design Codes requires a minimum area of open space based on the R-Code of the site. Landowners are responsible for the cost of maintaining trees on private property.

237	118 Brandon Street Kensington	
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
237.1 Support	Noted.
Please tell us why.	
237.2 Because I strongly believe we need to stop removing mature trees that take 50 years to be replaced. I bought in an established suburb because unlike mass suburbia we have many large trees and shade.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
237.3 Nil	Noted.

238	32 Redmond Street Salter Point
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
238.1 Support	Noted.
Please tell us why.	
238.2 Due to the importance of retaining (and increasing) tree canopy	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
238.3 Nil	Noted.

239	304/18 McDougall Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
239.1 Support	Noted.
Please tell us why.	

239.2	Tree retention will lead to a cooler environment and better place to live.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
239.3	Nil	Noted.

240	23 Banksia Terrace South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
240.1	Oppose	Noted.
Please tell us why.		
240.2	Reading through the detail some of this policy seems good in relation to planning approval for new developments and subdivisions where large areas of land are cleared, but other parts of the policy relating to existing trees on private property seem a step too far.	Noted.
240.3	Having to complete a development application and pay \$147 plus pay for supporting reports in order to cut down a large tree on my own property - say wanting to replace an introduced species with a native tree that is more water wise and provides a food source for local wildlife species - seems like over reach.	Should Council adopt the Policy, the City has recommended fees associated with development applications be waived in respect to applications for development approval for tree damaging activity to a regulated tree.
240.4	Fines for residents seem excessive at \$200k to 1 million - those fines are appropriate for developers but not for a local resident. I think this policy could also have unintended consequences and people may avoid planting larger trees on private property to avoid the bureaucracy once the tree reaches the "regulated tree" size. Once it reaches "regulated tree" size it seems you can't even cut a large branch off without approval. If I were a new resident and confused about how this policy may impact me	The fines are prescribed in accordance with the <i>Planning and Development Act 2005</i> . The City acknowledges that an unintended consequence of the Policy is such that smaller trees may be planted in future, however, the Policy seeks to retain existing mature canopy trees in the first instance.

	in future. I would avoid it by planting smaller trees.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
240.5	This policy should only be relevant for new developments and subdivisions. If an existing resident wants to cut down a tree on their own property and replace it with another one then they should be allowed to do that without the bureaucracy.	Noted, however, many mature canopy trees are located on existing developed properties. The Residential Design Codes provided tree planting provisions for new developments.
240.6	I think possibly the only trees that should have a higher protection status are local native trees. All introduced species should be allowed to be removed by local residents not just those classified as weeds. For example Cocos palms are classified as weeds in NSW and QLD but not WA. They are invasive and the berries poisonous to some animals. There are a number of introduced species in my street causing large amounts of damage to neighbouring fences, retaining walls and plumbing - its hard enough to work with neighbours to agree on tree issues and rectify damage without also having the additional cost of having to submit a planning application and arborist reports.	Noted, however, exotic species also provide canopy cover and therefore the Policy is proposed to apply to all trees that meet the definition of a regulated tree, not just native species.
240.7	Also what is the purpose of this policy when the verge trees are so badly neglected? All the Peppermints in my street look like something out of a haunted house book and have done for years even though I water mine - the pruning is rushed and poorly executed.	Noted. Unfortunately, the seriousness of the drought the south-west experienced this summer has affected many trees regardless of the additional water programmes provided.
240.8	Also thanks for encouraging me to plant a native garden on my front verge only to have the tree pruning team stomp all over my fledgling native plants on their last visit!	Noted.
241	98 Banksia Terrace Kensington	

Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
241.1 Neutral	Noted.
Please tell us why.	
241.2 I support the objective but I am opposed to the plan. Tree planting and maintenance should be encouraged, but I don't believe the community has the right to dictate what someone can or can't do to their own tree.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
241.3 If the community wants the right to tell a property owner what to do with a tree then will community pay for all maintenance of the tree and any impacts that tree might have, eg allergies, leaves, roots, etc?	Noted. The City can consider incentives (including financial) for tree retention and provision as part of the Urban Greening Strategy, which will be the subject of public consultation in future.

242	18 Market Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
242.1 Support	Noted.
Please tell us why.	
242.2 Nil	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
242.3 Nil	Noted.

243	113 Bessell Avenue Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

243.1	Support	Noted.
Please tell us why.		
243.2	It is important for wildlife, shade and mental health of residents to maintain trees.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
243.3	Nil	Noted.

244	21 Solomon Street Palmyra	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
244.1	Support	Noted.
Please tell us why.		
244.2	We need to improve Perth's tree canopy percentage, to help reduce the heat island effect, improve biodiversity, and mental health which is shown to be improved through human connection with, and exposure to, nature.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
244.3	Nil	Noted.

245	1/41 Mill Point Rd South Perth South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
245.1	Support	Noted.
Please tell us why.		
245.2	Tree cover is important for local wildlife and also for cooling our suburb. Trees on private property	Noted.

need to be regulated and saved from removal where possible.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
245.3 I'd love to see more trees planted in public areas like the foreshore to create more shade.	Noted. The City will continue to plant trees in public places subject to budget allocations.

246	4/7 Strickland Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
246.1 Support	Noted.
Please tell us why.	
246.2 We need trees to provide shade, shelter and for the health of living creatures in the environment and endless other reasons to be able to survive climate change.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
246.3 We need the older tree to give shelter and shade for everyone.	Noted.

247	4 Westmorland Street East Victoria Park
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
247.1 Support	Noted.
Please tell us why.	
247.2 Large trees provide a wide range of benefits to the community including increasing property values, decreasing micro climate temperatures, providing habitat for local fauna, absorption of CO2 from atmosphere as well as just being pleasant to look at and be	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

around. In my opinion, these things are worth conserving.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
247.3 Nil	Noted.

248	15 Canterbury Terrace East Victoria Park
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
248.1 Support	Noted.
Please tell us why.	
248.2 Tree canopy loss is one of the biggest health risks facing our Perth suburbs. Trees are good for sucking up pollution, provide shade and cooling houses and streets, and habitat for native fauna. What's not to like? It is URGENT to stop the loss of canopy trees on private land due to inappropriate development.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
248.3 The Draft LPP - Tree Retention is not enough but it's a positive step towards saving our trees. I would also suggest Council adopt positive strategies to encourage tree retention, such as: 1. Incentives to retain trees - eg. rates discounts for residents who have large canopy trees, land owner rebates or subsidies for tree maintenance costs, and a team of arborists on Council staff to attend to tree maintenance for pensioners etc. 2. Conducting a serious public awareness campaign to change people's hearts and minds. Too many seem to be afraid of trees or find them 'messy'.... This mindset must be changed if we are to save the planet.	Noted.

249	52 Planet Street Carlisle
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
249.1 Support	Noted.
Please tell us why.	
249.2 This policy is similar to legislation in other Australian states which protects trees from development. Absolutely vital to save us many trees as we can to try and cool our environment.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
249.3 I don't live in the area but hope that this policy helps other council to create similar policies.	Noted.

250	1 Angry Street (sic) South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
250.1 Oppose	Noted.
Please tell us why.	
250.2 Nowhere is there any mention whatsoever of PAYING the private landholders for the MASSIVE cost of managing a big tree. Those costs will only escalate if you bring in even more rules that say the private landholder then has to spend MORE time dealing with you, to even have permission to do something on land which is PRIVATE. And the sheer hypocrisy of this - you allow people to have water guzzling lawns, you allow plastic 'grass', you allow NO GARDEN AT ALL. And now you want to place even more burden on PRIVATE land holders! Unbelievable. You allow new dwellings to be built right up to the fenceline and then the first thing they	<p>Noted, however, landowners are already responsible for the maintenance of trees on private property.</p> <p>The City can consider incentives (including financial) for tree retention and provision as part of the Urban Greening Strategy, which will be the subject of public consultation in future.</p> <p>Lot boundary setbacks and walls on the boundary are determined in accordance with the Residential Design Codes.</p>

do is complain about the branches, the leaves, you name it. And then you have the hide to only plant a few hundred trees on the massive amount of public land that could host far, far, far more vegetation and trees. Gross hypocrisy.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
250.3 Yes. PAY THE COSTS OF THE TREES you want to control.	Noted.

251	140 Shakespeare Street Mount Hawthorn
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
251.1 Support	Noted.
Please tell us why.	
251.2 Large mature trees are being removed to the detriment of the community and the environment. We need to increase our canopy protection so as to protect our suburbs from the damaging effects of a hotter climate, and the loss of habitat for our animals. There needs to be greater value placed on mature tree retention as there is for historically significant buildings!	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
251.3 Nil	Noted.

252	105B Ryrie Avenue Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
252.1 Support	Noted.
Please tell us why.	

252.2	The majority of Local Governments in the Perth metro area are introducing tree retention LPP's, so it is only right that we follow suite. This is especially important in South Perth as there is a diminishing tree canopy due to the apartments etc.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
252.3	No.	Noted.

253	5 Crofter Court Wellard	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
253.1	Support	Noted.
Please tell us why.		
253.2	We need to retain a decent canopy of trees in this area to help to keep our residential areas cool. To protect bird life and ultimately our own. Carbon reduction is also important.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
253.3	No	Noted.

254	PO Box 8084 Fremantle	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
254.1	Support	Noted.
Please tell us why.		
254.2	I am an Architect and am consistently involved in development work around Perth and the state. Whilst it is well known in urban design the overwhelming advantages of retaining tree canopy. Often an 'easy' footprint	Noted.

of a new building is prioritised over tree retention. Any assistance through legislation to back up passive design principles is to be commended, encouraged and well over due. I applaud city of South Perth going forward with tree retention legislation. My firm Matthews and Scavalli architects has completed a number of projects with the City of South Perth.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
254.3 Nil	Noted.

255	85 Chapman Road Bentley
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
255.1 Support	Noted.
Please tell us why.	
255.2 Tree canopy is very important and need trees	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
255.3 It's good	Noted.

256	108 Hill View Terrace St James
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
256.1 Support	Noted.
Please tell us why.	
256.2 Regulations of this nature are urgently needed to protect our dwindling canopy. Well done to CoSP for acting on this.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

256.3	Nil	Noted.
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257	6 Stevington Street Kelmscott	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
257.1	Support	Noted.
Please tell us why.		
257.2	Because trees are vital to our wellbeing and biodiversity. They provide habitat, oxygen, shade and amenity. They are under so much threat through infill development, climate change and pest and disease that all our mature trees that can possibly be retain need to be. That includes that on private land.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
257.3	Nil	Noted.

258	Canning Highway Melville	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
258.1	Support	Noted.
Please tell us why.		
258.2	We need more trees to keep the heat down and oxygen up	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
258.3	No	Noted.

259	2 Donna Street Rossmoyne	
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Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
259.1 Support	Noted.
Please tell us why.	
259.2 We need to increase our urban tree canopy.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
259.3 Nil	Noted.

260	31 Derby Road Subiaco
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
260.1 Support	Noted.
Please tell us why.	
260.2 Tree Canopy is essential to maintaining lower ambient temperatures in our suburbs. Perth has some of the lowest tree canopy cover of any city in Australia. Trees on private property also need protection.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
260.3 Nil	Noted.

261	6b Amery Street Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
261.1 Support	Noted.
Please tell us why.	

261.2	Trees, although on private property benefit the whole community.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
261.3	Please save and plant, save and plant.	Noted.

262	1/101 Gardner Steet Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
262.1	Oppose	Noted.
Please tell us why.		
262.2	It is at the discretion of the land owner as to what trees they do or do not have on their property. In addition and in my experience, the COSP are incompetent and unable to utilise logic and reason is assessments and therefore should not be provided with powers to mandate.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
262.3	Nil	Noted.

263	364 Canning Highway Como	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
263.1	Oppose	Noted.
Please tell us why.		
263.2	The last criteria should not be a sole criteria to come within the policy. Otherwise, any tree, regardless whether it satisfies the first three criteria or not, that is not a weed, comes within the policy. That will lead to a lot of work for the City if owners need to get permission every time a	It is assumed this is referring to the definition of a regulated tree. The interpretation is such that a tree would meet the height, diameter and circumference requirements, however, trees that are on a State or local area weed register would be excluded despite meeting the balance of the requirements.

tree that is not a weed is to be removed. You need to amend the criteria.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
263.3 Nil	Noted.

264	24D Hovia Terrace Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
264.1 Support	Noted.
Please tell us why.	
264.2 A mature tree canopy has multiple benefits, positive environmental outcomes, adding to social amenity as well as potential economic benefits for landowners and citizens living in the area.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
264.3 No	Noted.

265	12 Hodge Coury Marmion
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
265.1 Support	Noted.
Please tell us why.	
265.2 Even if people don’t believe in climate change, trees provide a beautiful aesthetic to local environments supporting mental health, wildlife and reducing suburb temperatures.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

265.3	Plant and save as many trees as possible and never cut down significant trees.	Noted.
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266	31 Sixth Avenue Shelley	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
266.1	Support	Noted.
Please tell us why.		
266.2	We need to retain every significant established tree to help regulate urban temperatures and avoid contributing further to climate change.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
266.3	Nil	Noted.

267	125 Stevens Street White Gum Valley	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
267.1	Support	Noted.
Please tell us why.		
267.2	For our own survival, never mind health, we have to recognise the benefits of mature trees.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
267.3	Great first step!	

268	164 Douglas Avenue Kensington	
Comment		
Summary of Submission		Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
268.1 Support	Noted.
Please tell us why.	
268.2 I believe it is important for there to be some form of protection for mature trees through a regulated approval process.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
268.3 There many health and environmental benefits associated with green tree cover in metropolitan areas not limited to making the Local environment cooler and therefore the suburb I'm more pleasant place to live. Also, trees are important habitats for birds and provide depending on the species for bees which further contribute to the Health of other vegetation.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

269	5 Maldon Place Parklands
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
269.1 Support	Noted.
Please tell us why.	
269.2 We need our trees. We must protect our trees especially native trees and vegetation. Every tree is precious. They provide food and shelter for the birds and other wildlife. They are also good for the overall environment. They keep the temperature lower. They make us feel better. They give us oxygen and remove carbon dioxide. They clean the air. The improve our health - physically and mentally	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

269.3	We need to save our trees - the mature as well as the smaller ones (which will replace the older ones as they die). I think the criteria should be that all native trees must be saved but especially the larger, mature trees.	Noted.
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270	33 Donegal Road Floreath	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
270.1	Support	Noted.
Please tell us why.		
270.2	Tree canopy across Perth is declining. South Perth is a n iconic heritage suburb enjoyed by many. Its local tree assets must be protected.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
270.3	Please support it - our canopy and local environment is in dire straits.	Noted.

271	51 Sheldrake Street Stirling	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
271.1	Support	Noted.
Please tell us why.		
271.2	We all need lungs to breathe! Respect wildlife. Respect humans. Help to prevent us from over heating & consider how much more welcoming & beautiful an area is with trees & garden..no brainer!	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
271.3	Nil	Noted.

272	99b Solomon Street Palmyra
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
272.1 Support	Noted.
Please tell us why.	
272.2 The benefit of trees in urban areas are well known, ...cooling effect in a climate which is heating up and becoming drier leading to a lessening reliance on air conditioning and use of fossil fuels, increase exercise and outdoor activity by residents, habitat for birds and other animals. There is also improved aesthetics. Perth has the lowest tree canopy of all capital cities in Australia and the loss of established trees due to indiscriminate land clearance can not be replaced. We must stop the loss of existing trees and increase the existing tree canopy with new plantings.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
272.3 Nil	Noted.

273	19 David Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
273.1 Support	Noted.
Please tell us why.	
273.2 So important for health, environment, air quality, fauna habitat, heat mitigation for mature trees to have as much protection as possible. Between developers, ignorant home owners	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

and shot borer our communities need legislative protection.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
273.3 Politicians, developers and community members need to understand that large trees, remnant bushland and green spaces are actually community assets not just to the present community but to future generations. This remains true whether it is private property or public (private schools should not have the exclusive rights to community access public lands either). Individuals should not have the right to diminish assets at the expense of future generations ie the loss of an existing tree that will take a further 3 generations to replace or other community members ie heat islands and poorer air quality.	Noted.

274	66 Healy Road Hamilton Hill
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
274.1 Support	Noted.
Please tell us why.	
274.2 Climate change is the largest health challenge of our times. We need to increase tree cover urgently this includes protecting existing developed trees.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
274.3 Thanks for the opportunity to contribute.	Noted.

275	21 Albert Street Claremont
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
275.1 Support	Noted.
Please tell us why.	
275.2 Trees add to our quality of life and health., and we do not have enough of them in most of Perth. Trees are large and impact a large area, larger than a single lot - so it can not be solely up to the 'owner' to decide their fate. Trees take decades to grow, and so long term planning is required to ensure we have enough.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
275.3 There should be a requirement for every land owner to contribute to the tree cover. In the same way you must have a driveway/cross over, there should be a minimum tree cover required.	Noted.

276	125 Manning Road Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
276.1 Support	Noted.
Please tell us why.	
276.2 I am only supportive of healthy, long remaining life trees which can be reasonably retained, supported by planning controls/concessions that enable the effective development of the land. Mature Tree protection as planned is a great step to enabling planning and design professionals the opportunity to work these wonderful natural assets in the future development which itself will enhance the character amend value pf the development.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	

276.3	It should be applied to all Main Roads reservations too	Noted, however, the Policy applies to private property only.
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277	45 Gladstone Avenue South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
277.1	Oppose	Noted.
Please tell us why.		
277.2	In most cases, the trees have been planted by the home owner, and as such the home owner should have an ongoing right to remove or modify the tree as they see fit. Furthermore, I thought we were trying to fast-track developments to address the housing crisis. This will only put another layer of bureaucracy and red-tape in the way.	Noted. Refer to 'Impinging on Private Property Rights' and 'Role of Council in regulating land' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
277.3	The council should put more focus on greening common areas (parks, verges, roadside, etc). Take a look at other suburbs (Nedlands, etc) where extensive use has been made of planting London Plane trees on roadside and verges. It has transformed the suburb and made it much cooler in hot months. For some reason, South Perth council is opposed to London Plane trees and plants Jacaranda instead, which are an ongoing menace to gutters and street leaf litter, while providing minimal shade.	Noted. The City will continue to maintain and plant street trees. The City will consider appropriate species as part of the as part of the Urban Greening Strategy, which will be the subject of public consultation in future.

278	50 Campbell Street Kensington	
Comment		
Summary of Submission		Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
278.1 Support	Noted.
Please tell us why.	
278.2 Mature trees are important to reduce the effects of climate change as they capture carbon and provide shade and cooling.	Noted. Refer to the ‘Benefits of tree retention’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
278.3 Nil	Noted.

279	10 Ellersdale Avenue Warwick
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
279.1 Support	Noted.
Please tell us why.	
279.2 Because it's the trees on private land that are disappearing faster than anywhere else.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
279.3 Not on tree retention but that large developers should be required to have a percentage of their development include trees that are eventually going to get to these dimensions. I am not a resident of South Perth but I am definitely a consumer of your services and a visitor to your suburbs.	Noted. Tree planting provisions are contained within the Residential Design Codes.

280	136 Crawford Road Maylands
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
280.1 Support	Noted.

Please tell us why.	
280.2	Because WA must do more to protect and increase the urban forests in all our cities and towns. That WALGA, as representatives of WA local governments has written this template policy shows a demand for reform from our elected leaders at a local level. I commend the City of South Perth for being leaders in this area.
	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
280.3	Well done City of South Perth for not modifying the WALGA policy!
	Noted, however, the City has slightly modified the WALGA Model Local Planning Policy template.

281	128 Gilbertson Road Kardinya
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
281.1	Support
	Noted.
Please tell us why.	
281.2	We are losing far too many large trees to development and other causes. Our tree canopy is far too small.
	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
281.3	Other Local councils should do this. I would be very pleased if my local council Melville did this too.
	Noted.

282	2 Winsport Court Merriwa
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
282.1	Support
	Noted.
Please tell us why.	

282.2	WA low canopy cover means EVERY mature canopy tree needs protection Old, large trees store more carbon than fast growing trees with shorter lifespans Endangered black cockatoos and other birds need the trees for feeding and resting points.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
282.3	No	Noted.

283	66 King William Street Bayswater	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
283.1	Support	Noted.
Please tell us why.		
283.2	We need to urgently increase tree canopy in Western Australia. Protection of canopy on private property is a serious way this can be achieved	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
283.3	Nil	Noted.

284	26D Hovia Terrace Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
284.1	Support	Noted.
Please tell us why.		
284.2	Having tree cover makes a significant impact to a suburb in it's aesthetic and also to how enjoyable it is to live here - both in having wildlife around, making going for walks enjoyable, as well as keeping houses noticeably cooler.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
284.3 One of the things I enjoy about Kensington is the trees around the streets, it's good to see efforts going towards retaining this, and hopefully eventually increasing tree cover.	Noted.

285	86 Dyson Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
285.1 Oppose	Noted.
Please tell us why.	
285.2 The draft LPP should in our view be focused entirely on subdivision and/or new build applications (LPP 3. Application).	Noted.
285.3 The very vague reference in Section 3 (c) ""other strategic Planning Proposals including Scheme amendments and structure plans"" is essentially non-specific per se casting a very wide horizon for tree protection where private property rights are curtailed or at best short changed given generally it is her/his right to manage their own real asset.	Noted. Proposals for a Structure Plan or Scheme Amendment would require additional consultation to landowners in accordance with the Planning and Development (Local Planning Schemes) Regulations 2015. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
285.4 Even the Commonwealth Govt powers of ""land management"" dont arise until substantially underground.	Noted.
285.5 In a nut shell the suggested LPP tree policy would inevitably, in fact, transfer privately grown trees on privately owned land to Local/State body proprietorship. Land owners should remain the managers of the vegetation on their own lot.	Noted.
285.6 The mind set of ""tree retention" "canopy retention"" is relevant to government owned, regional space, educational and scientific facilities,	Noted.

	utility and such like public allocated land lots.	
285.7	It is underscored in the proposed LPP the early intervention for tree retention but is there any negotiated settlement process in place for the land owner to simply remove a tree that she/he simply dislikes. It appears the preceding point of negotiated recess or addressment is absent. Has the private land owner an option to substitute an existing tree for another?	Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets/ replacement provisions which may otherwise be preferred by landowners/ developers over retaining vegetation. Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.
285.8	Tree retention has always been in the City's Planning departments assessment process anyhow - where the officer suggests retention or building design alteration to accommodate exiting vegetation. Streetscape is simply public carriageway vegetation adornment on the public open space called the verge.	Noted, however, whilst the City can encourage tree retention in the design of new developments, there are no statutory controls to ensure retention.
285.9	The subject LPP regulation pivots on assessment criteria which in itself is subjective and alludes to a particular perspective that therefore can allow the sidelining of property owner rights.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
285.10	Your LPP Section 6.2 (regulated tree removal embargo) in our opinion is absolutely untenable. Landowners can have allergies to certain tree types, landowners purchase properties for views, personal dislikes towards tree varieties is reality of the human condition. In fact it is totally unacceptable that a local government body would even contemplate Section 6.2 as the pivotal base, a judgemental stance, in controlling private gardens therefore land tenure. Govt (at all levels) have manifestly failed historically (and currently) in tree protection as seen on their own land holdings. The comment space on this draft policy is insufficient to cover the subject matter in hand properly.	Noted. Refer to 'Role of Council in regulating land within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		

285.11	The draft policy is subjective, judgemental and controlling in view that efforts to retain trees at City planning department level have been in place for some time. The existing tall trees within the City that are located on private land exist because the owners want them there. Owners of existing "regulated trees" should retain control of their own asset which is not a public asset - the draft policy is pure over regulation when back grounded upon a built environment planning control mindset that allows density living and neighbourhood shadowing of such which is only one example of many other questionable practices in town planning.	Noted. Whilst the City acknowledges that many landowners maintain and retain mature trees on private property, as redevelopment and infill development is occurring, the City is experiencing loss of mature trees on private property.
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286	15 Holiday Way Yanchep	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
286.1	Support	Noted.
Please tell us why.		
286.2	I support this draft LPP as it protects and enhances the dire need for canopy cover in perth metro and surrounds. We are facing an increase in climate change, heat exhaustion and creating urban heat islands. We need better plans to help protect trees, especially those of a mature nature from the unnecessary destruction. We need to look at our future and how we will face a developing state with lack of canopy cover, shade and diminishing wildlife.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
286.3	Nil	Noted.

287	15 Holiday Way	
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	Yanchep
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
287.1 Support	Noted.
Please tell us why.	
287.2 We need to look after our environment and protect developed trees.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
287.3 Nil	Noted.

288	3 Waverley Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
288.1 Support	Noted.
Please tell us why.	
288.2 In 2020 the City of South Perth tree canopy was only 17%. Since this tree canopy assessment Town Planning Scheme No 7 has been adopted which will ultimately increased housing density and further reduce the percentage of tree canopy. Existing mature tree canopy needs to be urgently protected for environmental habitat, to mitigate the Urban Heat Load, improves air quality and reduces noise pollution.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
288.3 Nil	Noted.

298	44 Lansdowne Road Kensington
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
298.1 Support	Noted.
Please tell us why.	
298.2 Trees are vital to the environment and landscape. Removal should be discussed and decided by more than one person - and would benefit from involvement of a landscaper who has the best interests of the tree in focus.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
298.3 Can we review the trees in Kensington- some are not appropriate - not safe and not kind to wildlife or draught Can we plant trees that will provide shade but not drop gum nuts which are a hazard to many pedestrians or drop branches with awful spiky thorns ? Let's plant smart and make smaller choices.	Noted, however this Policy is applicable to private property owner. The City will consider tree species for street tree planting as part of a future Urban Greening Strategy.

290	Ryrie Avenue Como
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
290.1 Support	Noted.
Please tell us why.	
290.2 The City of South Perth has been losing many trees lately. This is a very concerning issue for our future. It is vital that we retain as many mature trees as possible in mitigating climate change.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
290.3 The preservation of CoSP- owned/managed assets such as trees, public open spaces, and bushland should be a priority. All proposed developments should be scrutinized and reviewed to ensure their	Noted.

alignment with urban greening strategies. Retaining mature trees that take decades to grow is essential. Replacing them with one or two smaller tree stocks is inadequate. Therefore, the retention of mature trees and the planting of additional new tree stock is the best approach.	
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291	116 Banksia Terrace Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
291.1 Oppose	Noted.
Please tell us why.	
291.2 I fully support a range of approaches being adopted to work to influence and support residents to maintain a healthy tree population within the City of South Perth. In addition I welcome that all residents already have the ability to nominate a Significant Tree on their property.	Noted, however, the Minister for Planning removed provisions related to the Significant Tree Register in Local Planning Scheme No. 7.
291.3 While I support efforts for tree retention I cannot support the Tree Retention proposal. I cannot support the City regulating to constrain the choice of private property owners over their own properties. Regulating to constrain choice of property owners is an unnecessary burden upon the residents of the City, particularly given that a mechanism already exists via the nomination of a Significant Tree, to preserve trees.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
291.4 I note that the City could also be doing more without the need for regulation. For example removal of overhead powerlines would facilitate the growth of 'prominent' trees along our many street verges.	Noted. The City's vision is to have overhead power lines placed underground throughout the entire City. The State Underground Power Program (SUPP) replaces overhead power lines with underground power infrastructure. The City will monitor future funding rounds of the SUPP with a view to nominate other areas within the City for the program.

291.5	At a time when inflation is at its highest point in a generation and when property development costs are already some of the highest in the world, I cannot support a regulation that will add hundreds of dollars of additional costs to the residents of the City.	Noted. The City has recommended fees associated with development applications be waived in respect to applications for development approval for tree damaging activity to a regulated tree.
291.6	The existing policy of allowing for trimming of neighbours trees encroaching upon one's own property is an appropriate and sensible way of managing the issue. I cannot support an approaching of constraining ones ability to trim trees encroaching from a neighbouring property. This requirement can only end in an increase of neighbourly disputes and is a clear overreach of the proposal.	Noted.
291.7	Allergies impact many residents of the City and can materially impact the quality of life of the sufferer. That suffering from allergies is baked in by design as an insufficient justification to manage trees on ones own property is troubling and a clear overreach of the proposal. I cannot support the Tree Retention proposal.	Whilst the City acknowledges the serious nature of some allergies, historically, minor allergies have been used as justification for removal of street trees. This criteria has therefore been included in the Policy to specify that in most circumstances, regulated trees would not be supported for removal on this basis. As with all applications to remove regulated trees, the City could consider each application on its merits having regard to the requirements of the Policy if adopted by Council.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
291.8	A majority of residents of South Perth are aligned with the general approach of protecting trees within our community - its part of the reason we live here. There already exists a number of tools at disposal of the City to encourage residents to maintain a healthy tree profile, including the existing ability to 'lock in' tree retention on private property via nomination of a Significant Tree. Regulation as proposed is unnecessary and overreach.	Noted, however as previously advised, the Minister for Planning removed provisions related to the Significant Tree Register in Local Planning Scheme No. 7.
292	14 Lyall Street	

South Perth	
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
292.1 Oppose	Noted.
Please tell us why.	
292.2 We note the following extract from the Council Agenda 28 March 2023, Item 10.3.1: “In August 2021, when Council endorsed draft LPS 7 for advertising, a provision was included which required development approval to be obtained to remove or prune a tree over 8m in height on private property. As part of the WAPC’s consent to advertise draft LPS 7, the City was directed to modify the Scheme text to remove this provision.”	Noted.
292.3 This Item further states “In WA, the Joint Standing Committee on Delegated Legislation has ruled that local laws for tree protection on private land are inappropriate. This is based on interpretation of the Local Government Act 1995, and its ability to regulate activities of landowners/occupiers on private property.”	Noted.
292.4 Whereas Local Planning Policies do not hold the same statutory weight as a Local Law, the progression of this Tree Retention Policy feels like a thinly veiled attempt at achieving the same objectives as originally planned through the Scheme (deemed inappropriate).	Noted.
292.5 The draft Policy proposes an excessive level of control by the City over private property, and introduces unreasonable expectations and onerous obligations through the new control measures over day-to-day activities. Pruning for example will require residents to make a judgement call in order to adhere to (including but not limited to) pruning of 10% or less of the canopy, to not remove limbs of diameters of 100mm or more, and to ensure pruning is being undertaken in accordance the Australian Standards or be at risk of undertaking activities not considered ‘maintenance pruning’, or engage a	Noted. Refer to ‘Role of Council in regulating land within the Consultation section of the report.

	specialist contractor at a cost. The definition of maintenance pruning should also have an 'or' after (a) involves removing dead or diseased wood only.	
292.6	Aside from the ongoing question of appropriateness of local council having this extent of control over private property, we also agree with Cr Mary Choy who raised concerns about property rights, enforcement, increased cost and conflict between neighbours, as reported following the May 2024 Council meeting on the subject.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
292.7	The draft Policy introduces unnecessary red tape and processes where ordinarily, the works may have been exempt as follows: "A development application is required for any tree damaging activity to a regulated tree where other works are proposed on a subject site, even if those other works are exempt from development approval under the local planning scheme as per Schedule 2, Part 7 Clause 61 of the Regulations."	Noted.
292.8	Town of Victoria Park has adopted a policy Local Planning Policy No. 39 Tree Planting and Retention that would only apply to development (planning) applications and incentivises the retention of existing trees rather than mandating their retention, however the Policy also recognises and respects the existing planning instruments – extract as follows from Town of Victoria Park Policy: "Note 1: This Policy does not apply to Multiple Dwellings in areas coded R40 or above, or Mixed Use Developments, which are addressed by State Planning Policy 7.3 – Residential Design Codes Volume 2 – Apartments." local-planning-policy-39-tree-planting-and-retention (victoriapark.wa.gov.au) The Town of Victoria Park Policy also states: "The Council encourages the retention of existing trees on private properties in all instances, however this Policy does not mandate the retention of existing trees, nor is a development application required for the removal of a tree(s) on private property."	Noted.

	Per the Town of Victoria Park FAQs: "This Policy is applicable to applications for development approval. The provisions of this Policy do not and cannot be applied where a development application is not required."	
292.9	Where it does relate to works ordinarily requiring development approval, the current format of the City of South Perth Policy is introducing additional barriers and constraints over and above the existing planning and development instruments such as the R-Codes.	Noted.
292.10	The proposed Policy by the City of South Perth has the potential to disincentivise much needed infill development, due to this additional red tape, constraints and costs, during a widely reported housing crisis. We support Minister Carey's plans for a State-led approach to greening based on incentivising owners / developers rather than controlling via punitive measures as quoted below: ""This will include Government grant programs, events and incentives, a public education program, expanding successful planting and tree programs, improved tree canopy data, and opportunities to partner with local government and community groups. ""The strategy will focus on an incentive-based approach, rather than a punitive approach."" https://www.wa.gov.au/government/media-statements/Cook-Labor-Government/New-State-led-approach-to-greening-Perth%27s-urban-communities-20240209	Noted. Refer to 'Impact on achieving dwelling targets' in regulating land within the Consultation section of the report. It is also noted that the Residential Design Codes – Volume 2 – Apartments, seek to retain mature canopy trees in the first instance and otherwise require tree planting within deep soil zones.
292.11	We believe this will foster better long-term outcomes and will not result in developers/owners being increasingly hesitant to plant trees that may be classified as regulated trees, and/or limiting to the minimum requirement for new development, potentially concerned over future implications.	Noted.
292.12	Under 6.2 the justifications not supported are too broad and are unreasonable, and could significantly compromise development outcomes in their current	Noted.

<p>format. For example, justification not supported: “The tree variety causes nuisance by way of leaf, fruit or bark shedding or the like”; Take for example a shedding tree on a child care site where the fruit or leaf shedding could be considered hazardous. It is unclear if works could be undertaken in this instance for safety, or potentially rejected given the provisions of 6.2 above (and an Arborist report and/or Structural Engineering Report would not provide the relevant information in response to the child care requirements in this example).</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>292.13 We also highlight part 7.2, which provides for the following: Tree damaging activity to a regulated tree may be considered if the following relevant information and/or technical reports are provided to demonstrate: (c) “In the opinion of the city, the redesign of the development to accommodate the regulated tree is unfeasible.” Does the City of South Perth have the relevant expertise to interpret and determine the feasibility of a development. In determining the feasibility of a development, a developer/owner may consult a range of experts including but not limited to architects, planners, engineers, property specialists, and quantity surveyors. This section is poorly drafted and potentially exposes the City Officers, placing unreasonable expectations around expertise and parameters in their decision making. Can the City confirm how the city intends to arrive at an opinion of whether a redesign is unfeasible. Has the City committed to reasonable timing for turnaround of these reviews.</p>	<p>The City has a Design Review Panel with suitably qualified experts (including architects and urban designer)) who can assist landowners/ applicants by providing advice on development concepts/ proposals, to seek to retain trees whilst also providing for development.</p>

<p>293</p>	<p>1/14 Lyall Street South Perth</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
293.1 Oppose	Noted.
Please tell us why.	
293.2 We are in a housing crisis and this significantly imposes extra restraints for site alterations when there are already significant and highly cumbersome restraints. Councils should not have rights over trees on private property (unless they are on a significant /heritage tree register already approved by the landowner not imposed on landowner. Incentives should be used not restraints.	Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
293.3 So many issues with this policy- feel it is underhanded way of avoiding wpc direction through policy. I don't ethically / legally agree with retrospective impositions on private land. Thus will not encourage more tree planting in fact the constant threat of this will ensure people DONT plant trees (as they are restricting future uses of a site) This is not ok and will encourage other behaviours... feels like a tick box imposition not a policy that seeks an incentivised quality (tree canopy) - thus will encourage people not to plant trees (exact outcome we don't want)	Noted.

294	64 Collins Street Kensington
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
294.1 Support	Noted.
Please tell us why.	
294.2 We need to save mature trees and keep the suburb leafy and green.	Noted.

Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
294.3 Plant more trees.	Noted.

295	1/15 Roydhouse Street Subiaco
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
295.1 Oppose	Noted.
Please tell us why.	
295.2 Firstly, we would like to acknowledge the importance of landscaping and trees to a development. Overall, we understand that landscaping and trees are a positive contributor to urban environments including benefits such as social connectedness, mental health and wellbeing, physical health and wellbeing, and the mitigation of urban heat.	Noted.
295.3 However, our view is that the tree Retention policy is not the answer and will have detrimental effect on developments and the quality of development outcomes. The proposed policy will artificially reduce the value of some development sites to the extent that those sites will not be developed. Two topics which are relevant to the Tree Retention Policy are Housing and affordability crisis and WA Residential Design Codes.	Noted.
295.4 The problem with policies which don't provide certainty to developers is that redevelopment won't occur on sites that have significant trees because developers don't have the luxury of taking the risk of the development approval process. Trees are often poorly located on sites, significantly impacting the ability to provide efficient planning of projects. For example, poorly located and large	Noted. Refer to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report.

	<p>trees often eliminate the potential for efficiently planning parking and amenity areas. Often substantial trees do create an emotional debate, even when they are not suitable trees for the location and have been poorly sited.</p>	
295.5	<p>Housing and affordability crisis and WA Residential Design Codes</p> <p>As we are all acutely aware, we are currently facing a housing shortage and affordability crisis in WA. What we are experiencing is the number of completed homes is significantly lower than the number of approvals given. Tanya Steinbeck, chief executive officer of the Urban Development institute of Australia in WA has recently commented on the issue, to quote “This is the result of years of systemic failure in strategic planning to ensure we have a sustainable forward pipeline of housing supply.” The Tree Retention policy will have a pile on effect as development sites will either not be developed or be underdeveloped.</p> <p>Every project we tackle employs a feasibility rigour which examines extensive factors including detailed costing analysis of projects to determine its viability as a development. As you can imagine in this current climate of constant cost increases, it has become very challenging to make projects viable, many projects are on the edge of feasibility, with a very high number of projects not proceeding beyond DA. The Tree Retention policy will add cost to potential development sites Ultimately these costs are transferred to the buyer.</p> <p>For example, if you take into consideration the value or cost of private land within the South Perth precinct where some lots can be valued at more than \$13,000 / m2 (as evidenced by recent sales) a 10% loss</p>	<p>Noted. Whilst the City acknowledges that there may be costs associated with designing a development to maintain a regulated tree, the costs associated with a development application (which the City is recommending be waived if the Policy is adopted) are minimal.</p> <p>The City also acknowledges that additional rates with new developments provide a revenue source for further urban greening, however, planting and retention of canopy trees on private property is also required to ensure urban greening across the entire district.</p>

<p>of area on a site due to tree retention can be valued at over \$2M in land revenue alone. Ultimately, this policy will contribute to a loss of value, making it unfeasible to build new homes, loss of development potential, due to reduction in land area and the added bureaucratic processes in an already highly regulated development bureaucracy. Do we really need to incur additional costs and potential losses when we are already grappling with an affordability and supply crisis? We suggest the council would be better placed supporting new development rather than potentially hindering development. Ultimately more development equates to increased rates revenue for the council which could be used for the enhancement and 'greening' of existing urban environments.</p>	
<p>295.6 Design WA Residential Design Codes The Design WA Residential Design Codes already ensure the protection of trees and landscaping. It is worth noting the requirement under the current Design WA Residential Design Codes. The intent of the R-Codes is already adequate in ensuring new development will provide new trees and landscaping including the provision of new large trees, replacing any loss and in some cases increasing the amount of landscaping. Items from the R-Codes as follows :</p> <ul style="list-style-type: none"> • A minimum deep soil area of 10% of the site area is to be provided for the purposes of providing landscaped areas including trees. Providing ample opportunity for large trees and landscaping. • New developments must provide communal open space for the benefit of the residents at a ratio of 1m² per dwelling up to a maximum of 300m². Again, providing 	<p>Noted. Whilst the Residential Design Codes encourage retention of mature trees, sites can otherwise be cleared and developers instead require to plant new trees in accordance with the tree planting/ deep soil provisions of the Residential Design Codes. As such, mature canopy trees are often removed, with developers preferring to plant new trees in locations that suit the design of the new building, as opposed to designing the building to suit the location of existing mature trees.</p>

<ul style="list-style-type: none"> adequate opportunity for landscaping. New trees in developments can be species that contribute to a sense of identity and character of the area and enhance neighbourhood amenity. 	
<p>295.7 Opportunities for a better outcomes In conclusion, after speaking with Landscape Architects and should Council desire to improve housing supply and housing affordability, we would like to propose the following:</p> <ul style="list-style-type: none"> Developers should be given the opportunity to replace a tree that will be removed. It should be based on a formula, such as 1 large tree will be replaced with a minimum 3 medium tree in 300 litre planters. Planning requirements now mandate deep soil areas, and these trees can be provided either on structure or in deep soil. Many of our projects are excellent examples of improving landscape outcomes through the appropriate siting of trees and planting on balconies and through communal areas. Further to these incentives could be introduced if a tree is retained. Provisions may be increased density and heights, to make up the monetary loss in land value. 	<p>Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets which may otherwise be preferred by landowners/ developers over retaining vegetation (i.e. development led design compared to tree retention led design). Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.</p> <p>The City can consider incentives as part of consultation on the future Urban Greening Strategy.</p>
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
295.8 Nil	

296	64A Stuart Street Maylands
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
296.1 Oppose	Noted.
Please tell us why.	

<p>296.2 Trees are important for our community, however the policy will have a detrimental effect on developments and the quality of development outcomes. It will also have an impact on housing supply and affordability during the worst housing crisis of our lifetime. The problem with policies which don't provide certainty to developers is that redevelopment won't occur on sites that have significant trees because developers don't have the luxury of taking the risk of the development approval process. Trees are often poorly located on sites, significantly impacting the ability to provide efficient planning of projects. For example, poorly located and large trees often eliminate the potential for efficiently planning parking and amenity areas. Often substantial trees do create an emotional debate, even when they are not suitable trees for the location and have been poorly sited. Housing and affordability crisis and WA Residential Design Codes As we are all acutely aware, we are currently facing a housing shortage and affordability crisis in WA. What we are experiencing is the number of completed homes is significantly lower than the number of approvals given. Tanya Steinbeck, chief executive officer of the Urban Development institute of Australia in WA has recently commented on the issue, to quote "This is the result of years of systemic failure in strategic planning to ensure we have a sustainable forward pipeline of housing supply." The Tree Retention policy will have a pile on effect as development sites will either not be developed or be underdeveloped. Every project we tackle employs a feasibility rigour which examines extensive factors including detailed costing analysis of projects to determine its viability as a development. As you can imagine in this current climate of constant cost</p>	<p>The City believes that retention of mature trees is aligned with providing quality development and design outcome.</p> <p>Noted. Refer to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report.</p> <p>Whilst the Residential Design Codes encourage retention of mature trees, sites can otherwise be cleared, and developers instead require to plant new trees in accordance with the tree planting/ deep soil provisions of the Residential Design Codes. As such, mature canopy trees are often removed, with developers preferring to plant new trees in locations that suit the design of the new building, as opposed to designing the building to suit the location of existing mature trees.</p>
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increases, it has become very challenging to make projects viable, many projects are on the edge of feasibility, with a very high number of projects not proceeding beyond DA. The Tree Retention policy will add cost to potential development sites. Ultimately these costs are transferred to the buyer. For example, if you take into consideration the value or cost of private land within the South Perth precinct where some lots can be valued at more than \$13,000 / m² (as evidenced by recent sales) a 10% loss of area on a site due to tree retention can be valued at over \$2M in land revenue alone. Ultimately, this policy will contribute to a loss of value, making it unfeasible to build new homes, loss of development potential, due to reduction in land area and the added bureaucratic processes in an already highly regulated development bureaucracy. Do we really need to incur additional costs and potential losses when we are already grappling with an affordability and supply crisis? We suggest the council would be better placed supporting new development rather than potentially hindering development. Ultimately more development equates to increased rates revenue for the council which could be used for the enhancement and 'greening' of existing urban environments. Design WA Residential Design Codes. The Design WA Residential Design Codes already ensure the protection of trees and landscaping. It is worth noting the requirement under the current Design WA Residential Design Codes. The intent of the R-Codes is already adequate in ensuring new development will provide new trees and landscaping including the provision of new large trees, replacing any loss and in some cases increasing the amount of landscaping. Items from the R-Codes as follows : A minimum

<p>deep soil area of 10% of the site area is to be provided for the purposes of providing landscaped areas including trees. Providing ample opportunity for large trees and landscaping. New developments must provide communal open space for the benefit of the residents at a ratio of 1m² per dwelling up to a maximum of 300m². Again, providing adequate opportunity for landscaping. New trees in developments can be species that contribute to a sense of identity and character of the area and enhance neighbourhood amenity.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>296.3 Opportunities for a better outcomes. In conclusion, after speaking with Landscape Architects and should Council desire to improve housing supply and housing affordability, we would like to propose the following: Developers should be given the opportunity to replace a tree that will be removed. It should be based on a formula, such as 1 large tree will be replaced with a minimum 3 medium tree in 300 litre planters. Planning requirements now mandate deep soil areas, and these trees can be provided either on structure or in deep soil. Many of our projects are excellent examples of improving landscape outcomes through the appropriate siting of trees and planting on balconies and through communal areas. Further to this incentives could be introduced if a tree is retained. Provisions may be increased density and heights, to make up the monetary loss in land value.</p>	<p>Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets which may otherwise be preferred by landowners/ developers over retaining vegetation (i.e. development led design compared to tree retention led design). Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.</p> <p>The City can consider incentives as part of consultation on the future Urban Greening Strategy.</p>

<p>297</p>	<p>22 Arkwell Way Marmion</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
297.1 Oppose	Noted.
Please tell us why.	
297.2 The tree Retention policy will have detrimental effect on developments. It already is challenging enough for projects to be viable. It has become very challenging to make projects viable, many projects are on the edge of feasibility, with a very high number of projects not proceeding beyond DA. The Tree Retention policy will add cost to potential development sites. Ultimately these costs are transferred to the buyer. Design WA Residential Design Codes already has more than adequate requirements. Items from the R-Codes as follows : A minimum deep soil area of 10% of the site area is to be provided for the purposes of providing landscaped areas including trees. Providing ample opportunity for large trees and landscaping. New developments must provide communal open space for the benefit of the residents at a ratio of 1m ² per dwelling up to a maximum of 300m ² . Again, providing adequate opportunity for landscaping. New trees in developments can be species that contribute to a sense of identity and character of the area and enhance neighbourhood amenity. I strongly oppose to the Tree Retention Policy.	Noted. Whilst the Residential Design Codes encourage retention of mature trees, sites can otherwise be cleared and developers instead require to plant new trees in accordance with the tree planting/ deep soil provisions of the Residential Design Codes. As such, mature canopy trees are often removed, with developers preferring to plant new trees in locations that suit the design of the new building, as opposed to designing the building to suit the location of existing mature trees.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
297.3 Nil	Noted.

298	12/5 Hay Street East Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

298.1 Oppose	Noted.
Please tell us why.	
<p>298.2 Firstly, we would like to acknowledge the importance of landscaping and trees to a development. Overall, we understand that landscaping and trees are a positive contributor to urban environments including benefits such as social connectedness, mental health and wellbeing, physical health and wellbeing, and the mitigation of urban heat. However, our view is that the tree Retention policy is not the answer and will have detrimental effect on developments and the quality of development outcomes. The proposed policy will artificially reduce the value of some development sites to the extent that those sites will not be developed. Two topics which are relevant to the Tree Retention Policy are Housing and affordability crisis and WA Residential Design Codes. The problem with policies which don't provide certainty to developers is that redevelopment won't occur on sites that have significant trees because developers don't have the luxury of taking the risk of the development approval process. Trees are often poorly located on sites, significantly impacting the ability to provide efficient planning of projects. For example, poorly located and large trees often eliminate the potential for efficiently planning parking and amenity areas. Often substantial trees do create an emotional debate, even when they are not suitable trees for the location and have been poorly sited. Housing and affordability crisis and WA Residential Design Codes As we are all acutely aware, we are currently facing a housing shortage and affordability crisis in WA. What we are experiencing is the number of completed homes is significantly lower than the number of approvals given. Tanya Steinbeck, chief executive</p>	<p>Noted. Refer to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report.</p> <p>Whilst the Residential Design Codes encourage retention of mature trees, sites can otherwise be cleared, and developers instead require to plant new trees in accordance with the tree planting/ deep soil provisions of the Residential Design Codes. As such, mature canopy trees are often removed, with developers preferring to plant new trees in locations that suit the design of the new building, as opposed to designing the building to suit the location of existing mature trees.</p>

officer of the Urban Development institute of Australia in WA has recently commented on the issue, to quote "This is the result of years of systemic failure in strategic planning to ensure we have a sustainable forward pipeline of housing supply." The Tree Retention policy will have a pile on effect as development sites will either not be developed or be underdeveloped. Every project we tackle employs a feasibility rigour which examines extensive factors including detailed costing analysis of projects to determine its viability as a development. As you can imagine in this current climate of constant cost increases, it has become very challenging to make projects viable, many projects are on the edge of feasibility, with a very high number of projects not proceeding beyond DA. The Tree Retention policy will add cost to potential development sites Ultimately these costs are transferred to the buyer. For example, if you take into consideration the value or cost of private land within the South Perth precinct where some lots can be valued at more than \$13,000 / m² (as evidenced by recent sales) a 10% loss of area on a site due to tree retention can be valued at over \$2M in land revenue alone. Ultimately, this policy will contribute to a loss of value, making it unfeasible to build new homes, loss of development potential, due to reduction in land area and the added bureaucratic processes in an already highly regulated development bureaucracy. Do we really need to incur additional costs and potential losses when we are already grappling with an affordability and supply crisis? We suggest the council would be better placed supporting new development rather than potentially hindering development. Ultimately more development equates to increased rates revenue for the council

<p>which could be used for the enhancement and 'greening' of existing urban environments. Design WA Residential Design Codes. The Design WA Residential Design Codes already ensure the protection of trees and landscaping. It is worth noting the requirement under the current Design WA Residential Design Codes. The intent of the R-Codes is already adequate in ensuring new development will provide new trees and landscaping including the provision of new large trees, replacing any loss and in some cases increasing the amount of landscaping. Items from the R-Codes as follows : A minimum deep soil area of 10% of the site area is to be provided for the purposes of providing landscaped areas including trees. Providing ample opportunity for large trees and landscaping. New developments must provide communal open space for the benefit of the residents at a ratio of 1m² per dwelling up to a maximum of 300m². Again, providing adequate opportunity for landscaping. New trees in developments can be species that contribute to a sense of identity and character of the area and enhance neighbourhood amenity. Opportunities for a better outcomes In conclusion, after speaking with Landscape Architects and should Council desire to improve housing supply and housing affordability, we would like to propose the following: Developers should be given the opportunity to replace a tree that will be removed. It should be based on a formula, such as 1 large tree will be replaced with a minimum 3 medium tree in 300 litre planters. Planning requirements now mandate deep soil areas, and these trees can be provided either on structure or in deep soil. Many of our projects are excellent examples of improving landscape outcomes through the appropriate</p>	
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siting of trees and planting on balconies and through communal areas. Further to this incentives could be introduced if a tree is retained. Provisions may be increased density and heights, to make up the monetary loss in land value.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
298.3 Nil	Noted.

299	219a Manning Road Waterford
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
299.1 Support	Noted.
Please tell us why.	
299.2 We need to retain the limited canopy that we have in our suburbs. The council can plant/maintain on public spaces, but most of the space in our suburbs is in private ownership. I'm seeing more and more new builds filling the entire property with no green space, or removing trees as they expect that it will enlarge the buildable area, reduce maintenance or increase property value.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
299.3 I'm concerned that there will be many owners and builders pre-emptively cutting trees or having "accidents" to remove trees before this new policy comes into place.	Noted. The City acknowledges that this may be an unintended consequence of the Policy.

300	11 Arlington Avenue South Perth
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
300.1	Support	Noted.
Please tell us why.		
300.2	We need better regulation to drastically improve tree retention and meet canopy targets.	Noted. Refer to ‘Achieving canopy targets’ within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
300.3	Fully support it.	Noted.

301	42 Kennard Street Kensington	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
301.1	Support	Noted.
Please tell us why.		
301.2	Trees are important for our world. Without regulation, too many are killed.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?		
301.3	Does this cover trees on State Government owned land in the City of South Perth? I hope so. After all the Kensington Police Station did remove trees a couple of years ago "for their air conditioning"! Yes I know it is in Vlc Park.	The Policy applies to zoned land under Local Planning Scheme No. 7 (predominantly private property). Reserved land is typically managed by State or local government.

302	1/15 Roydhouse Street South Perth	
Comment		
Summary of Submission		Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?		
302.1	Oppose	Noted.
Please tell us why.		

<p>302.2 Firstly, we would like to acknowledge the importance of landscaping and trees to a development. Overall, we understand that landscaping and trees are a positive contributor to urban environments including benefits such as social connectedness, mental health and wellbeing, physical health and wellbeing, and the mitigation of urban heat. However, our view is that the tree Retention policy is not the answer and will have detrimental effect on developments and the quality of development outcomes. The proposed policy will artificially reduce the value of some development sites to the extent that those sites will not be developed. Two topics which are relevant to the Tree Retention Policy are Housing and affordability crisis and WA Residential Design Codes. The problem with policies which don't provide certainty to developers is that redevelopment won't occur on sites that have significant trees because developers don't have the luxury of taking the risk of the development approval process. Trees are often poorly located on sites, significantly impacting the ability to provide efficient planning of projects. For example, poorly located and large trees often eliminate the potential for efficiently planning parking and amenity areas. Often substantial trees do create an emotional debate, even when they are not suitable trees for the location and have been poorly sited.</p>	<p>Noted. Refer to 'Impact on achieving dwelling targets and limiting development' within the Consultation section of the report.</p>
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>302.3 Nil</p>	<p>Noted.</p>

<p>303</p>	<p>24 Alexandra Road East Fremantle</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
303.1 Oppose	Noted.
Please tell us why.	
303.2 We are currently facing a housing shortage and affordability crisis in WA, the policy could prevent the development of the sites resulting in decreasing the ability to provide housing.	Noted. Refer to 'Impact on achieving dwelling targets' in regulating land within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
303.3 Other initiatives could be considered to provide alternative outcomes such as replacing a large tree with medium trees (in deep soil are as prescribed by Residential codes) etc.	Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets or replacement trees which may otherwise be preferred by landowners/ developers over retaining vegetation (i.e. development led design compared to tree retention led design). Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.

304	113 First Avenue Bassendean
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
304.1 Oppose	Noted.
Please tell us why.	
304.2 Australian continent has a total land area of 7.688 million km2 with approximately 24 billion standard trees. Removing 1 tree from your backyard is not going to make a huge difference, especially if you are willing to compensate by adding more trees as per State Planning Policy. Removing a tree from your own land which you paid for, if it is not in favour of the owner of property, is the right of an individual. City/Council shouldn't intervene in the individual right.	Noted. Refer to 'Impinging on Private Property Rights' and 'Role of Council in regulating land' within the Consultation section of the report. Retention of canopy across the district has other benefits beyond environmental, as outlined in the 'Benefits of tree retention' within the Consultation section of the report.

<p>City/Council can provide guidelines, but cannot make it a statutory requirement. The people who make these laws are the same people who drive 8-cylinder Landcruiser and own a second EV car to prove that they are doing everything 'Green'. Ride a cycle, take the train, stop building never ending freeways, reduce urban sprawl etc. should be the key initiatives not tightening knot around owners of an already crippling community and industry.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>304.3 Policy should be used as a guideline, no need for planning approval to remove a tree. Obviously can notify the tree removal for records. If this policy goes ahead no one would want to buy a property.</p>	<p>Noted.</p>

<p>305</p>	<p>19 Ednah Street Como</p>
<p>Comment</p>	
<p>Summary of Submission</p>	<p>Comment</p>
<p>To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?</p>	
<p>305.1 Oppose</p>	<p>Noted.</p>
<p>Please tell us why.</p>	
<p>305.2 I believe land owners should want to support trees on their private property and the planning system should seek to provide incentives for this. The proposed policy provides no incentive to retain or grow trees on private property, it just introduces red tape and makes it much more difficult to prune large trees. I also question how workable the policy will be in a practical sense.</p>	<p>Noted. The City can consider incentives (including financial) for tree retention and provision as part of the Urban Greening Strategy, which will be the subject of public consultation in future. The City would require appropriate data to ensure implementation of the Policy.</p>
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>305.3 It should be redrafted to provide planning incentives in support of the retention of large trees. I would also</p>	<p>Noted.</p>

commend the City for the tree planting it has undertaken on public land over recent years.	
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306	7 Goddard Street Lathlain
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
306.1 Support	Noted.
Please tell us why.	
306.2 We have insufficient tree canopy now and we need to do everything possible to retain trees. Many old trees are on blocks are easily knocked down and harder to replace. They have spent many years growing, providing shade to cool us down. Consideration must be given to retaining as many as possible and stop lazy developers bulldozing trees instead of putting their brains into gear and designing around trees. This also provides a level of amenity that is missing from new suburbs who have houses wedged together without any gap, no trees, no room for a tree or a garden and are simply urban heat islands. We must do better and do better now.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
306.3 Nil	Noted.

307	15 Roydhouse Street Subiaco
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
307.1 Oppose	Noted.
Please tell us why.	

<p>307.2 Firstly, we would like to acknowledge the importance of landscaping and trees to a development. Overall, we understand that landscaping and trees are a positive contributor to urban environments including benefits such as social connectedness, mental health and wellbeing, physical health and wellbeing, and the mitigation of urban heat. However, our view is that the tree Retention policy is not the answer and will have detrimental effect on developments and the quality of development outcomes. The proposed policy will artificially reduce the value of some development sites to the extent that those sites will not be developed. Two topics which are relevant to the Tree Retention Policy are Housing and affordability crisis and WA Residential Design Codes. The problem with policies which don't provide certainty to developers is that redevelopment won't occur on sites that have significant trees because developers don't have the luxury of taking the risk of the development approval process. Trees are often poorly located on sites, significantly impacting the ability to provide efficient planning of projects. For example, poorly located and large trees often eliminate the potential for efficiently planning parking and amenity areas. Often substantial trees do create an emotional debate, even when they are not suitable trees for the location and have been poorly sited. Housing and affordability crisis and WA Residential Design Codes As we are all acutely aware, we are currently facing a housing shortage and affordability crisis in WA. What we are experiencing is the number of completed homes is significantly lower than the number of approvals given. Tanya Steinbeck, chief executive officer of the Urban Development institute of Australia in WA has recently commented on the issue, to quote</p>	<p>Noted. Refer to 'Impact on achieving dwelling targets' in regulating land within the Consultation section of the report.</p> <p>The City assesses new developments against the requirements of the Residential Design Codes with respect to retaining trees where possible and tree planting requirements, however, the Policy will provide for a statutory mechanism to protect trees that meet the definition of a regulated tree as prescribed in the Policy.</p>
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<p>“This is the result of years of systemic failure in strategic planning to ensure we have a sustainable forward pipeline of housing supply.” The Tree Retention policy will have a pile on effect as development sites will either not be developed or be underdeveloped. Every project we tackle employs a feasibility rigour which examines extensive factors including detailed costing analysis of projects to determine its viability as a development. As you can imagine in this current climate of constant cost increases, it has become very challenging to make projects viable, many projects are on the edge of feasibility, with a very high number of projects not proceeding beyond DA. The Tree Retention policy will add cost to potential development sites Ultimately these costs are transferred to the buyer. For example, if you take into consideration the value or cost of private land within the South Perth precinct where some lots can be valued at more than \$13,000 / m2 (as evidenced by recent sales) a 10% loss of area on a site due to tree retention can be valued at over \$2M in land revenue alone. Ultimately, this policy will contribute to a loss of value, making it unfeasible to build new homes, loss of development potential, due to reduction in land area and the added bureaucratic processes in an already highly regulated development bureaucracy. Do we really need to incur additional costs and potential losses when we are already grappling with an affordability and supply crisis? We suggest the council would be better placed supporting new development rather than potentially hindering development. Ultimately more development equates to increased rates revenue for the council which could be used for the enhancement and ‘greening’ of existing urban environments. Design</p>	
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<p>WA Residential Design Codes . The Design WA Residential Design Codes already ensure the protection of trees and landscaping. It is worth noting the requirement under the current Design WA Residential Design Codes. The intent of the R-Codes is already adequate in ensuring new development will provide new trees and landscaping including the provision of new large trees, replacing any loss and in some cases increasing the amount of landscaping. Items from the R-Codes as follows : A minimum deep soil area of 10% of the site area is to be provided for the purposes of providing landscaped areas including trees. Providing ample opportunity for large trees and landscaping. New developments must provide communal open space for the benefit of the residents at a ratio of 1m² per dwelling up to a maximum of 300m². Again, providing adequate opportunity for landscaping. New trees in developments can be species that contribute to a sense of identity and character of the area and enhance neighbourhood amenity. Opportunities for a better outcomes. In conclusion, after speaking with Landscape Architects and should Council desire to improve housing supply and housing affordability, we would like to propose the following: Developers should be given the opportunity to replace a tree that will be removed. It should be based on a formula, such as 1 large tree will be replaced with a minimum 3 medium tree in 300 litre planters. Planning requirements now mandate deep soil areas, and these trees can be provided either on structure or in deep soil. Many of our projects are excellent examples of improving landscape outcomes through the appropriate siting of trees and planting on balconies and through communal areas. Further to this incentives could</p>	
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be introduced if a tree is retained. Provisions may be increased density and heights, to make up the monetary loss in land value.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
307.3 Nil	

308	72-74 Mill Point Road South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
308.1 Oppose	Noted.
Please tell us why.	
308.2 Trees and urban environments are valued by society and local communities, to the extent that developers include well thought out landscaping designs within new developments for sustainability, aesthetic and wellness purposes. The urban environment within these developments is proudly marketed on project websites and brochures during the selling process and on Development Applications. Whilst new built form projects may require the removal of established trees, preventing the removal of these trees without a DA is not a balanced solution to overall progression of growing communities. Developments provide housing for growing populations, which is even more important in the current housing crisis Perth is experiencing. Having to retain trees which are poorly located or create a less efficient building, will prevent many developments from proceeding, and further drive up the price of developments. Providing a balanced approach which provides developers with clarity to what can be achieved is essential for developments to proceed.	Noted. Refer to 'Impact on achieving dwelling targets' in regulating land within the Consultation section of the report.

<p>If the cost of developments is driven upwards due to less efficient spatial planning of building, it will not only reduce the pipeline of housing for the future, but it will also prevent local councils from achieving their structure plans.</p>	
<p>Do you have any other comments about the draft Local Planning Policy - Tree Retention?</p>	
<p>308.3 To accommodate a balanced approach, we would like to propose the following: Landowners and developers should be given the opportunity to replace trees that are required to be moved. Whilst many trees may take a long time to be adequately replaced in terms of square meter of tree canopy, multiple trees can be planted within the local environment at the cost of the landowner/ developer. This could include a minimum size to be returned on its current location, and potentially others in strategically nominated locations within the local council, in consultation with that council to assist with fast tracking the replacement of the tree canopy lost, but long term providing more than what was removed. Review of the current deep soil planning requirements. Where large trees are removed from lots, potentially specifying a size of tree in accordance with the one/s removed be returned within the deep soil zone. Incentivising developers to keep trees deemed significant or important. Where retention of trees is achieved, this loss of building efficiency could be offset by bonus plot ratio and height to an extent that makes the site feasible for development.</p>	<p>Noted. The Policy seeks to retain mature canopy trees. It did not include provisions for offsets which may otherwise be preferred by landowners/ developers over retaining vegetation (i.e. development led design compared to tree retention led design). Immature trees do not achieve the same benefits as existing mature trees with respect to amenity value and reducing carbon emissions.</p> <p>The City is unable to vary the tree planting/ deep soil requirements of the Residential Design Codes without prior consent of the Western Australian Planning Commission.</p>

309	South Perth Tree Canopy Advocates
Comment	
Summary of Submission	Comment

To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
309.1 Support	Noted.
Please tell us why.	
<p>309.2 South Perth Tree Canopy Advocates (SPTCA) is a community group that is passionate about trees and all of their many benefits. We are working to protect and expand the tree canopy on private and public land in the suburbs of the City of South Perth and across Perth through informed discussion, engagement, and advocacy. We represent a large section of the City of South Perth community. Since our formation in May 2022 our numbers have grown steadily. We now have 900 members and followers on our Facebook pages and over 140 people on our mailing list and this is continuing to grow.</p> <p>This submission in SUPPORT of the Draft Local Planning Policy - Tree Retention (LPP) is made on behalf of those hundreds of members. You may not hear from all of them as individuals as many will have placed their faith in our group to advocate on their behalf. We are also one of 25 local Tree Canopy Advocate groups across Perth and WA regional centres that sit under the umbrella of the WA Tree Canopy Advocates. These groups total over 25,000 passionate tree lovers who are also very eager to see the LPP adopted and other Councils follow suit.</p> <p>SPTCA's key goals are:</p> <ul style="list-style-type: none"> • Legislation to protect existing significant trees on public and private land; and the • The planting of many more trees in our parks, streets and backyards to achieve a 30% canopy target. 	Noted.
309.3 As we know in WA, unlike most other States, we don't have specific legislation to protect urban trees on	Noted.

	<p>public and private land and the Minister for Planning knocked back the City's draft Local Planning Scheme No. 7 (LPS7) tree protection provisions earlier this year.</p> <p>The draft LPP is based on the template created by the WA Local Government Association and provides a well-considered approach for the regulation of tree removal on private property. It essentially echoes the draft LPS7 tree protection provisions that you as a Council signed off and we urge you as a Council to remain consistent and adopt the LPP now.</p>	
309.4	<p>The LPP is Even More Urgent Now</p> <p>We know that Perth has the hottest summers and the lowest canopy cover in the country, yet we are the only State without protections for trees on private property.</p> <p>Across the City of South Perth in 2020 our canopy was only 17% (Source: DPLH Urban Forest Dashboard). No data has been released by DPLH since then, but it is unlikely that this situation will have improved.</p> <p>It is also worth noting that the 17% canopy cover figure is skewed by the inclusion of the canopy within the Perth Zoo and the two golf courses. The actual canopy in and around South Perth homes, where it is most needed, is much less.</p> <p>And it's only getting worse. We have just endured a record-breaking long, hot, dry summer and many of our large trees are struggling to cope.</p> <p>The Polyphagous Shot Hole Borer is set to wipe out even more of our precious trees.</p> <p>80% of tree loss in Perth is occurring on private property. While you are planting more and more trees in our streets and parks to help address the urban heat island effect and climate change, this cannot compensate for the continuing loss of trees on private property.</p>	Noted.

<p>309.5 Why Trees?</p> <p>Trees are vital and valuable urban infrastructure. The benefits of trees go far beyond adding aesthetic beauty to our neighbourhoods as demonstrated by endless research. They provide a wide range of economic, social and environmental benefits including:</p> <ul style="list-style-type: none">- CO2 absorption and oxygen production: One tree absorbs about 22 kg of CO2 per year and produces enough oxygen for two people. This contributes significantly to improving air quality and mitigating climate change.- Temperature regulation: Trees reflect and absorb some solar radiation, which helps to cool the environment and reduce the urban heat island effect, lowering maximum temperatures by 5-10°C. A single tree can have the cooling effect of ten air conditioners.- Shade and protection: Trees provide shade and protection from UV radiation, which also cools the local microclimate. It is estimated that in summer shaded surfaces can be cooler than unshaded surfaces by 11-25°C, and evapotranspiration can lower peak temperatures by 5-10°C.- Habitat: Trees provide critical habitat and food for a variety of animals, including birds, insects and reptiles, thus promoting biodiversity.- Soil stabilisation and water retention: With its deep roots, a tree stabilises the soil and prevents erosion. The roots improve the soil structure and increase the water retention capacity of the soil.- Health benefits: Trees are proven to reduce stress and improve physical and mental health and wellbeing. They protect residents from pollution-related diseases,	<p>Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.</p>
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	<p>premature death and boosts overall quality of health.</p> <ul style="list-style-type: none">- Cloud formation and precipitation: Through evaporation, trees contribute to cloud formation and thus have a positive influence on the local microclimate and precipitation.- Air purification: Trees absorb dust and pollutants such as nitrogen oxides and sulphur dioxide, which significantly improves air quality.- Aesthetics and community identity: Trees provide natural beauty that enhance our neighbourhoods providing a sense of identity. They promote quality of life, social equality and inclusion in cities.- Soil fertility: Leaves that fall to the ground decompose and serve as food for the soil. This promotes soil fertility and supports the growth of other plants.- Nutrient cycling: Trees provide sugars to the mycelium in exchange for nutrients, which promotes soil life and supports ecosystem health.- Sound and visual protection: Trees can act as a visual barrier and help to reduce other background noise, which is particularly beneficial in urban areas.- Economic benefits: Urban trees increase property values and reduce energy costs by providing natural cooling.	
309.6	<p>Development and Trees Can Co-Exist</p> <p>The LPP is not anti-development. It would simply require all reasonable options to be exhausted before approval to remove a large healthy tree that has taken decades to grow is granted. It would push architects and designers to look for better solutions that make room for our existing trees wherever possible.</p> <p>If a large tree is located so that it makes development unviable its</p>	<p>Noted. Refer to 'Liability and Safety issues' within the Consultation section of the report.</p>

	<p>removal could be approved. Similarly, if a tree poses a serious safety risk to people or property its removal could be approved. These would be decisions made by you, the Council. SPTCA is simply seeking well designed, sustainable development that includes space for our existing large trees and more trees. Similar policies / regulations / laws exist in other states of Australia and they do not hinder development.</p>	
309.7	<p>Liveable Sustainable Neighbourhoods Trump Private Property Rights</p> <p>Arguments regarding the protection of private property rights are not valid given that all levels of Government already impose a very long list of restrictions on private property for the benefit and safety of the wider community. E.g. design of buildings including heights and setbacks, use of buildings, noise limits, animal limits, pool and fence requirements, etc, etc, etc. What could be more important than provisions that seek to protect the liveability of our suburbs for future generations?</p> <p>None of us live in isolation, we are all part of a community and we need to have regard for the amenity of our neighbours and for the environment.</p>	<p>Noted. Refer to 'Impinging on Private Property Rights' within the Consultation section of the report.</p>
309.8	<p>Well Considered and Reasonable Provisions</p> <p>The LPP is based on the WALGA template which was prepared in consultation with a large number of local government professionals and is based on legal advice.</p> <p>It does not apply to all trees, just our large trees that provide the greatest canopy and associated benefits. In other Australian states protections apply to smaller trees as well, but we agree that size parameters proposed in the LPP are a good starting point.</p>	<p>Noted.</p>
309.9	<p>The use of 'and/or' in the definition of a regulated tree is critical as it allows for trees that meet one or more than</p>	<p>Noted.</p>

one of the size criteria to be covered by the LPP.	
309.10 The provisions around pruning have been well thought through and seek to avoid tree loss by stealth using excessive and/or too frequent pruning.	Noted.
309.11 In conclusion, on behalf of our hundreds of followers we implore you to show leadership and consistency in decision making, and ADOPT the draft Tree Retention Local Planning Policy without delay. The amenity and liveability of our suburbs for future generations depends on it.	Noted.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
309.12 Nil	Noted.

310	Rowe Group Level 3 369 Newcastle Street Northbridge
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
310.1. Oppose	Noted.
Please tell us why.	
<p>310.2. Role of a Planning Policy</p> <p>We note that the purpose of the draft LPP is to encourage and facilitate the protection of trees and to maintain and enhance tree canopy. Whilst we support the concept of policy based measures to <i>encourage</i> tree retention, we are concerned that the draft LPP, in its current format, seeks to unlawfully <i>mandate</i> tree retention by requiring Development Approval to be sought and obtained prior to any tree-damaging activity being undertaken. Schedule 2 Part 2 of the <i>Planning and Development (Local Planning Scheme) Regulations 2015</i> ('PD Regs') provides for the preparation of local planning</p>	<p>Disagreed. Retention of mature canopy trees relates to the amenity of the locality, including environmental impacts, the character of the locality and social impacts of the development, all of which are established town planning principles.</p> <p>Whether any trees on the land should be preserved and any means that are proposed to protect or to mitigate impacts on the natural environment are also matters to be considered in the assessment of future development applications, as provided by the <i>Planning and Development (local Planning Schemes) Regulations 2015</i>.</p>

<p>policies. Clause 3(3) states that a local planning policy must be based on sound town planning principles and may address either strategic or operational considerations in relation to the matters to which the policy applies. In our view it is not demonstrated in the draft LPP or the Officer's Report to the Ordinary Meeting of Council held on 23 April 2024 that the draft LPP is based on sound town planning principles. That is, we accept that the draft LPP deals with a relevant town planning matter but do not accept that the provisions contained within it are based on sound town planning principles.</p> <p>The draft LPP seeks to dictate what constitutes 'development' under the provisions of the <i>Planning and Development Act 2005</i> ('PD Act') and therefore when Development Approval is required. This is not the role of a local planning policy. If the City wishes to impose development controls in the manner proposed under the draft LPP, it should do so via a formal amendment to its Local Planning Scheme No. 7.</p>	
<p>310.3. Head of Power</p> <p>The draft LPP relies heavily on the assumption that a tree damaging activity constituting 'development' under the PD Act and is therefore an activity for which Development Approval is required. The term 'development' is defined under the PD Act as follows:</p> <p><i>"...the development or use of any land, including:</i></p> <p>any demolition, erection, construction, alteration of or addition to any building or structure on the land; the carrying out on the land of any excavation or other works; <i>in the case of a place to which a protection order made under the</i></p>	<p>Noted. The City considers that the definition of works contained within the deemed provisions is broad enough to include the removal of trees, although it is recognised that application in this manner for the removal of a single tree has not previously been considered by the State Administrative Tribunal or Magistrates Court that would otherwise 'test' whether removal of a tree would constitute development that would otherwise require development approval.</p> <p>Whether the proposed work requires application of a planning framework relates to the nature and scale of the activity and any associated planning implications (such as impact on amenity).</p> <p>The City considers that Policy provisions that clearly specify that development approval is required, and providing specific criteria as to the circumstances which development</p>

<p><i>Heritage Act 2018 Part 4 Division 1 applies, any act or thing that:</i></p> <p>is likely to change the character of that place or the external appearance of any building; or</p> <p>would constitute an irreversible alteration of the fabric of any building.”</p> <p>Tree damaging activities are not expressly listed or, in our view, inferred in the definition of ‘development’ under the PD Act.</p> <p>The term ‘works’ is not defined in the PD Act but is defined in the LPS Regs as follows:</p> <p>“...the development or use of any land, including:</p> <p>any demolition, erection, construction, alteration of or addition to any building or structure on the land;</p> <p>the carrying out on the land of any excavation or other works;</p> <p><i>in the case of a place to which a protection order made under the Heritage Act 2018 Part 4 Division 1 applies, any act or thing that:</i></p> <p>is likely to change the character of that place or the external appearance of any building; or</p> <p>would constitute an irreversible alteration of the fabric of any building.”</p> <p>As the above demonstrates, the terms ‘development’ and ‘works’ have the same meaning under the PD Act and the LPS Regs.</p> <p>Similarly, the City of South Perth’s Local Planning Scheme No. 7 does not identify a tree damaging activity as a form of development or work that requires the granting of Development Approval.</p> <p>Given the above, legal review is required to determine whether the draft LPP maintains a suitable ‘head of power’ from which its provision can be legally enforced. We suspect that this</p>	<p>approval is required by defining a regulated tree, are sufficient to clearly define the City’s position in a planning framework.</p> <p>Legal advice was obtained in the preparation of the Policy which has affirmed the above position.</p>
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<p>'head of power' ought to be the City's Local Planning Scheme No. 7 but note that the local planning scheme does not maintain such power in its current form. An amendment to Local Planning Scheme No. 7 would therefore be required to give force and effect to the draft LPP.</p>	
<p>310.4. Regulated Tree Criteria</p> <p>Section 10 of the draft LPP defines a 'regulated tree' as a living tree that meets one or more of the following criteria:</p> <p>Is 8.0m or more high; and/or</p> <p><i>Has an average canopy diameter of at least 6.0m; and/or</i></p> <p>Has a trunk circumference of at least 10.5m, measured 1.4m above the ground; and</p> <p><i>Is of a species that is not included on State or local area weed register.</i></p> <p>The criteria for a regulated tree under the draft LPP appears arbitrary and without any meaningful justification or rationale.</p> <p>To be effective, a local planning policy needs to be clear and easily understood, free of ambiguity, transparent and most importantly supported by an appropriate level of justification and rationale. In our view, the draft LPP does not demonstrate an acceptable level of justification with regard to the 'regulated tree' criteria.</p> <p>The Officers Report to the Ordinary Meeting of Council held on 23 April 2024 states that the draft LPP is generally consistent with the <i>WALGA Tree Retention Model Local Planning Policy</i>. This, in itself, does not demonstrate that the draft LLP is based on a sound planning rationale. WALGA is an independent, member-based, not for profit organisation. It is not a regulation making authority and should not be treated as such.</p>	<p>Noted. The tree size was chosen to align with the medium tree size contained within the Residential Design Codes, being 6.0-9.0m for canopy diameter and 8.0-12.0m for tree height.</p>

<p>Section 7 of the draft LPP states that there is a general presumption against tree damaging activities and that a tree damaging activity will only be considered in specific circumstances. The circumstances outlined in the draft LPP appear similarly arbitrary and based on the City's specific objectives rather than any sound town planning principles.</p>	
<p>310.5. Existing Tree Protection Measures In considering an application for Development Approval, the City may require the retention of any tree on site, pursuant to Clause 67(2)(p) under Schedule 2 (Deemed Provisions) of the LPS Regs. On this basis, a degree of protection is already provided under the legislative framework. The draft LPP seeks to extend this level of control to mandate that Development Approval is required for any tree damaging activity regardless of whether Development Approval for other works on site is proposed. We consider this contrary to the purpose and intent of a local planning policy.</p>	<p>Noted. Clause 67(2)(p) of the deemed provisions only provides that in considering an application for development approval, the decision maker should consider whether any trees on the land should be preserved. It does not provide that a development application is required for the proposed removal of a tree itself, only that tree retention would otherwise be considered in the assessment of a broader development application once submitted.</p> <p>Local planning policies are used to assist local governments in making planning decisions under the local planning scheme by outlining acceptable development standards and establishing clear expectations to applicants on how decision-makers are likely to exercise discretion. The Policy outlining that the City considers that tree damaging activity to a regulated tree requires development approval is considered to meet this purpose.</p>
<p>310.6. Policy Application Section 3 of the draft LPP states that the LPP will only apply to zoned land within the City of South Perth. If the objective of the draft LPP is to maintain and enhance tree canopy, its provisions should be extended to zones and reserves. This would mean any tree damaging activity undertaken on Crown/State land, including land owned by or vested in the City of South Perth, is subject to the same provisions and requirements. The expectation that the draft LPP should apply to private landowners but not apply to the City or the State is grossly inequitable.</p>	<p>Noted, however, the majority of reserved land within the City is managed by the City. The City is seeking to maintain and plant trees on reserved land, and is preparing an Urban Greening Strategy in this respect.</p>

<p>310.7. Need for a State-Wide Approach</p> <p>It is becoming clear that a state-wide approach to tree retention in existing urban areas is necessary to establish a clear strategic direction and provide for consistent provisions. This is ultimately a role for the Western Australian Planning Commission ('WAPC').</p> <p>To ensure a consistent State-wide approach to tree retention, any local planning scheme and/or local planning policy provision relating to tree retention should only be provided in accordance with an adopted State Government position. Until this position is formalised, any local planning policy provisions in relation to tree retention should aim to <i>encourage</i> rather than <i>mandate</i>.</p>	<p>Agreed. The City believes tree retention on private property is a matter that needs to be addressed at the State Government level for consistency amongst local governments.</p> <p>The City's preference is for the State Government to amend Schedule 7, Part 2, clause 61 of the deemed provisions such that development is not required for tree removal (column 1) except where conditions are not met in column 2. This would have the effect of confirming tree removal is development, yet permitting removal except where trees meet certain criteria (height, species, geographic location in the State etc.).</p> <p>Notwithstanding, the State Government has not amended the deemed provisions to date and as such, the City is seeking to address the issue via the Policy.</p>
<p>310.8. Unexpected Consequences</p> <p>The draft LPP, in its current form, risks discouraging residents from planting trees on private property which is contrary to its purpose. An incentive-based approach would, in our view, offer greater encouragement for tree retention and suggest this be explored by the City prior to the draft LPP being presented back to Council for final approval.</p> <p>We note that the City of Kalamunda revoked its Local Planning Policy 33 – Tree Retention in February 2024 on the basis that the policy, whilst well-intentioned, had far-reaching impacts particularly with regards to safety and was <i>"inappropriate and inadequate in balancing the interests of ratepayers, alongside the interest of conservation of our natural assets"</i>. We recommend the City's Officers review the Minutes of the Ordinary Meeting of Council held at the City of Kalamunda on 27 February 2024 before presenting the draft LPP back to Council for adoption.</p>	<p>Noted. The City acknowledges that pre-emptive removal of trees or trees not being planted by landowners may be an unintended consequence of the Policy.</p> <p>The City has liaised with the City of Kalamunda to discuss the implications of its Local Planning Policy 33 – Tree Retention. The approach proposed in the Policy differs to the City of Kalamunda, notably in the use of 'works' compared to 'earthworks' in requiring development approval and the application of the Policy.</p>
<p>310.9. Referral to the WAPC</p>	<p>Noted. Approval of the Western Australian Planning Commission is only required where a</p>

<p>In our view a local planning policy is not an appropriate planning instrument through which to mandate development control and should not be used in lieu of suitably prepared and adopted local planning scheme provisions. In this context, it is considered appropriate that the draft LPP is referred to the WAPC for review and comment, prior to being considered for final adoption.</p>	<p>local planning policy otherwise varies the provisions of a State Planning Policy, which the Policy does not do. Tree planting provisions which are otherwise provided in the Residential Design Codes are not provided in the Policy.</p>
<p>310.10. Concluding Comments</p> <p>Whilst we support the concept of policy based measures to encourage tree retention, we are concerned that the draft LPP, in its current format, seeks to unlawfully mandate tree retention and will ultimately have the effect the discouraging the planting of trees on private property. We are concerned that the draft LPP:</p> <ul style="list-style-type: none">• does not demonstrate its provisions are based on sound town planning principles;• seeks to introduce development control provisions that are unlawful and without an appropriate 'head of power';• seeks to circumvent proper planning process by introducing development control provisions that ought to be addressed in a local planning scheme not a local planning policy;• contains criteria for a regulated tree that is arbitrary and without any meaningful justification or rationale;• is based on the <i>WALGA Tree Retention Model Local Planning Policy</i>, a document which carries no statutory force or effect;• does not acknowledge the existing controls available pursuant to Clause 67(2)(p) under Schedule 2 (Deemed Provisions) of the LPS Regs;	<p>Noted.</p>

<ul style="list-style-type: none"> • does not apply equitably to all landowners within the City and should, if adopted, apply to zoned and reserved land; and • should only be provided in accordance with an adopted State Government position and that until this position is formalised, its provisions should aim to encourage rather than mandate tree retention; <p>Having regard to these concerns, we wish to register our formal objection to the draft LPP.</p>	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
310.11. Nil	Noted.

311	3 Edinburgh Street South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
311.1. No Answer	Noted.
Please tell us why.	
<p>311.2. I write to provide feedback on the draft Tree Retention policy and in doing so commend the City for taking the initiative and foresight in seeking to adopt provisions to protect trees on private property.</p> <p><u>General comments</u></p> <p>Unfortunately, any new housing development in South Perth is usually preceded by “clear felling” of all vegetation on blocks without due regard to the type of trees, amenity or the environment. This should not be allowed to continue. Some owners will argue that it is their land and they have a right to do what they like with it. This is a fallacy given that there are many provisions which provide what we can and cannot do on private</p>	<p>Noted. The City has not included proposed conditions of development/ subdivision approval as contained within the WALGA model local planning policy, as these are administrative in nature and would otherwise be applied in the determination/ recommendation on any subsequent development/ subdivision application.</p> <p>Enforcement provisions are otherwise contained within the <i>Planning and Development Act 2005</i>.</p> <p>The tree size was chosen to align with the medium tree size contained within the Residential Design Codes, being 6.0-9.0m for canopy diameter and 8.0-12.0m for tree height.</p> <p>Provisions related to tree retention in the Eastern States are enshrined in State legislation.</p>

property so when addressing issues connected to the environment and amenity owners need to be reminded of this.

While it is laudable that the City is at long last considering provisions for the protection of trees on private property what is being proposed, while perhaps laying the foundations, is more like a "Clayton's" policy which appears to be purporting to be something it is not. That is, an attempt by the Council to appear serious about preserving tree canopy across its local government area while ensuring development proceeds as before, primarily unheeded.

In summary, the policy contains so many impediments including for example, a large list of exceptions, high minimum preservation requirements, absence of incentives and lack of penalties (or any indication of how these issues will be addressed). Even accountability provisions proposed in WALGA's draft have been omitted. Given these issues, it seems hard to imagine how the Policy will work in practice.

However, given the model you are following, I urge the City to re-think its Policy and adopt the same definition of a regulated tree as appears in the State Planning Policy 7.3 R-Codes Volume 2 (SPP7.3) and the Medium Density Code where it defines what it calls a "significant tree" as being one with dimensions less onerous than proposed by the City (see below).

My specific feedback on the Policy has been addressed under its corresponding headings as follows:

4 Objectives

In 4.1 it states that an objective of the Policy is to provide "...a clear definition of a regulated tree...". Unfortunately, the Policy fails to do this on a number of accounts:

Firstly, as a policy document the definition's reference to "...and/or..." is an unnecessary legalese eschewing plain English. It is apparently well known amongst the legal fraternity that the use of this device is ambiguous and likely to be open to misinterpretation, particularly amongst lay people charged with applying the policy (By way of an example: poor wording of the City's previous provisions dealing with synthetic turf appear to have led to various interpretations of those requirements).

Secondly, by including the provision relating to weed trees as item "(d)" in a list of items specifying options relating to minimum measurements is at the very least a clumsy attempt to over simplify a provision which could be stated more plainly, and sensibly, in a policy document.

With respect to the above drafting issue, the online page provided by the City calling for feedback provides a definition of a regulated tree in somewhat plainer English except for the inclusion of item "(d)" as a criterion when "(a)" to "(c)" are options when clearly "(d)" is not.

I therefore ask, in light of it being a policy document, that you consider redrafting the definition in plain straightforward English as originally shown in the online page but with modifications something like the following.

Means "...any tree on private property which meets the one or more of the following criteria:

- a. Is 8.0m or more in height
- b. has an average canopy diameter of at least 6.0m
- c. has a trunk circumference of at least 1.5m, measured 1.4m above the ground..."

<p>and where the tree "...of a species that is not included on the State or local area weed register." (NB: emphasis is mine to highlight missing "the")</p> <p>6 General Requirements</p> <p>It appears that item 6.1 provides a plethora of "get out of jail" provisions which are likely to undermine any attempt at preserving trees on private land. Further thought should be given to handling these matters in another way.</p> <p>7 Development Applications</p> <p>Item 7.2 appears to be inconsistent with item 6.1.</p> <p>8 Subdivision Applications</p> <p>I am concerned that the City has left out WALGA's item 8.3 of its draft Model Local Planning Policy Tree Retention which relates to development approval conditions. It would appear this is one of the most important provisions that would have helped hold developers to account and should be included in the final draft of the Policy.</p> <p>10 Definitions</p> <p>Regulated tree:</p> <p>Apart from comments made above regarding drafting style and the use of straight forward and plain English, the problem with this definition is the minimum requirements that must be met before it can be considered a regulated tree.</p> <p>For example, criterion (a) requires that the tree be 8 or more meters high. This is just shy of the height of an Olympic diving platform or, to put it another way, over 26 feet in the old parlance. This requirement would exclude many worthy trees which otherwise provide significant shade, habitat and clean air for the environment. In some cases, there may also be trees close to each other forming a significant canopy where individually these specimens may not meet any of the optional criteria.</p>	
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<p>Interestingly, criterion (b) requires the tree must have "...an average canopy diameter of at least 6.0m..." but does not stipulate a minimum height or minimum trunk circumference which is in accordance with each criterion standing independently of each other. Taken literally therefore, it suggests that this criterion would mean any tree under 8m or with a trunk circumference of less 1.5m but with a minimum canopy of 6m would be considered a regulated tree. While this provides for many more trees to fall under the category of a regulated tree it would seem this is not what is intended and as such would only cause confusion all round.</p> <p>Criterion (c) requires that the tree must have a circumference of 1.5m measured at 1.4m above ground. Not only does this stipulation mean that it must have a diameter of 478mm but that the height above ground level requirement ensures that fewer trees would come under this definition given that trunks are thicker towards the base.</p> <p>Apart from the apparent glitch with criterion (b) my concern is that this policy has been drafted to severely limit its application. The question is who decided to weaken its application, and why? An issues paper prepared by WALGA quotes the State Planning Policy 7.3 R-Codes Volume 2 (SPP7.3) and the Medium Density Code where it defines a significant tree as being one with one or more of the following measurements:</p> <ul style="list-style-type: none">• a "height of at least 4m";• a trunk "diameter of at least 160mm, measured 1m from the ground;• an "average canopy diameter of at least 4m". <p>I also understand that one or more Eastern States local governments have similar provisions to those contained in the State Planning provisions which would capture a great many more trees under the definition than what is</p>	
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proposed by the City. I urge the City of South Perth to be as equally as progressive and adopt the same minimum requirements.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
311.3. Nil.	Noted.

312	3 Craigie Crescent Manning
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	
312.1. Support	Noted.
Please tell us why.	
312.2. We need trees to reduce the heat island effect of houses and roads. It provides a refuge for birds. It makes for a cooler environment. It provides a habitat for insects. By having vegetation on peoples land the suburb is more attractive. It's an asset for children to climb and have adventure play.	Noted. Refer to the 'Benefits of tree retention' within the Consultation section of the report.
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
312.3. I think the retention of a tree can depend on meeting only one of the criteria and not all. Trees come in different sizes and shapes and by having a variety of criteria more trees can be retained. If for whatever reason trees are removed from private land then Council should be required to plant more trees on Council land.	Noted.

313	PO Box 8090 South Perth
Comment	
Summary of Submission	Comment
To what extent do you support the objective of the draft Local Planning Policy – Tree Retention, to regulate trees on private property?	

313.1. No Answer	Noted.
Please tell us why.	
<p>313.2. I am in support of growing and maintaining a green leafy ambiance in our suburb. Please refer to your google earth pictures of 30 Renwick St South Perth and take moment to remind yourself of the ongoing time and costs that I face to keep my trees gardens in great shape. I am not complaining as trees and birds help make my home. All my trees have been grown or planted by me for some 40 years and I am proud of the results. I maintain them, you don't.</p> <p>I would like to understand my personal disappointment towards the City of South Perth who have displayed no individuality and are using the "copycat" approach on a subject that was first raised by some of the Western Suburbs Councils. It is well known that the COSP is run by a stronger than acceptable level of "save the planet greenies".</p> <p>Stand on your Own two feet and don't be coerced by these irrational elements. Everywhere we turn someone is pushing a green existence for themselves. They just want to make a name for themselves as they have run out of creativity. Everyone knows that the transition to a carbon free environment is a positive move over the next generation. Don't thrust it down our throats, do something positive and original.</p> <p>For you to dictate what I do with my trees is simply unacceptable. Even the WA Police don't tell me what to do with my firearm (within reason). They are wise enough not to dictate their position which is beyond their appropriate direction. We are Law-abiding Citizens. You should take a leaf out of their book.</p> <p>The Minister for Local Government in recent years expressly directed the corridors between Perth and</p>	Noted.

Mandurah and Perth and the Northern suburbs should be made denser with multiple buildings in existing street lots. This increases reduces urban sprawl, increases revenue to the Cities and ultimately to the WA Government. What it does do is wipe out the existing and future tree vegetation as we know it.	
Do you have any other comments about the draft Local Planning Policy - Tree Retention?	
313.3. N/A	Noted.