

Wednesday, 18 September 2024

Sutherland Shire Council  
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## **Submission for the 2024 draft Tree and Bushland Strategy**

Sutherland Shire Environment Centre is a not-for-profit community organisation that has been advocating for the environment in the Sutherland Shire and surrounding bio-regions since 1991. We thank Sutherland Shire Council for the opportunity to provide a submission to this draft Tree and Bushland Strategy, as well as the opportunity to meet in June last year with the consultants who prepared this.

A number of our members have reviewed the draft strategy in detail. We believe it is a significant advance on the 2021 Tree Policy, which was limited in scope, lacked ambition and achieved little.

We are keen to see this new Strategy succeed. Sutherland Shire has some extraordinarily beautiful natural areas, but as the draft Strategy notes, our tree canopy is declining at a rapid rate. Although no data has been provided for the 2020-24 period, Council staff estimated the 2021 Urban Tree and Bushland Policy would result in an additional 250+ trees being lost each year, on top of the 2016-20 pattern of decline. It is likely that the 2020 24.7% canopy cover figure is generous, and the percentage is now even lower.

We ask Council to take this into account when the draft is reviewed, and provide more recent canopy cover estimates.

### **Future canopy cover targets**

We support Council's aim of reaching the State government target of 40% canopy cover across residential areas. However no date has been set for this target to be reached.

The draft Strategy only proposes increasing tree cover in urban areas beyond the 2020 benchmark by 2034 (see p.6). This target is very weak, and it will do nothing to recover the significant amount of canopy lost over the last few years.

Saplings take years to grow to maturity – stronger targets, and setting up a proactive forward planning planting schedule to meet these is vitally important.

While Council's "Vision" of caring for canopy sounds positive, as do statements about canopy supporting "a rich diversity of life and living things", the phrase "support and maintain" in the "Vision" does not indicate that increasing canopy cover is a priority.

The aim to implement best practice management by 2050 is not inspiring. A Strategy needs to do more than make vague claims about what will be achieved decades in the future.

Georges River Council has a Tree Policy that has a clear target of achieving 40% canopy cover by 2038. Georges River and Sutherland Councils share similar geography and demographics. We suggest Sutherland Council adopt a similar target, increasing canopy cover to 40% by 2034-8.

A clear target should be stated explicitly in the Strategy, and this should be backed up with comprehensive operational plans.

## Performance measures, transparency, funding and accountability

Targets are important. Further clarity around exactly what the Strategy intends to achieve and by when would be welcome. Currently key aspects of this Strategy are not funded, including “standardised operational procedures for assessment, planting, establishment, maintenance, and management” (see p.45). Actions in the implementation plan such as “Monitor canopy change” and “Monitor tree removals and replacements” are not funded.

To ensure this Strategy is not just empty rhetoric, quantifiable performance measures should be added detailing how the 40% canopy cover increase will be achieved. Timeframes for actions to be implemented should be included, and how outcomes will be reported, and how often.

There also needs to be more transparency as to exactly where all funding is directed, what is given priority, and what isn't. Currently tree and bushland care and maintenance is spread across a number of areas of Council, in addition to Natural Area Management. How much funding Council plans to spend on playgrounds / play equipment rather than bush and parkland used for passive enjoyment should be disclosed. It is also hard to find information about how much Council spends on managing / removing trees on public land.

Retaining trees on site rather than replanting saplings elsewhere is essential to maintaining canopy in residential zones subject to increased density. This should be Council's aim, along with best practice care for mature trees to ensure they are healthy. It costs money to cut down old trees, and to plant new saplings. What funding allocations will be given to tree removal v's care should be disclosed. Currently it is not apparent that saplings which are planted are adequately cared for. There appears no publicly available information about what species have been planted, where they have been planted, and which have lived or died. This information should be included in reports and targets clearly delineated in the Strategy.

Over the last few years Council has also cut down many mature trees around public recreation areas. With the target to increase canopy to 40%, removing trees should be a last resort. Continuing on this trajectory will make it impossible to increase our canopy cover from 24.7% to 40%.

The photo to the right shows what was a healthy tree that was left in situ after at least 65 other mature canopy trees were cut down at Sutherland Pool in order to install a carpark. It was not disclosed anywhere in the Waratah Park Masterplan Consultation documents that these trees would be removed. After the trees were cut down they were replaced with 25 saplings. This mature tree left in situ was subjected to the treatment shown here, soil built up around the tree ensuring roots would become waterlogged. Of course the tree died. Meanwhile the new carpark is a heatsink, and the 25 new saplings provide no shade. We have received dozens of complaints from members of the public who valued parking in an area with a beautiful grove of trees that provided shade. No one was happy with the consultation process or Council's work here.



The new Oyster Bay Masterplan similarly proposes removing 74 beautiful mature trees that have enhanced the area for decades. That Masterplan has also drawn numerous complaints, and it appears Council is not respecting the wishes of the community.

Another recently proposed amendment to the Development Control Plan (DCP) allowing trees to be cut down within 3 metres of properties and pools acts directly against the Principals and Vision of the draft Tree and Bushland Strategy. It should be noted that the formal community consultation regarding this proposal resulted in 91% of people opposed it.

Councillors should not be facilitating, or encouraging the removal of trees.

Another recent motion sent to Gateway Determination proposes that land zoned C3 / C4 Environmental Protection and Conservation be changed to R2 Residential – if this rezoning proceeds significant canopy loss is likely to occur.

If Councillors continue on this trajectory it will be impossible to reach the canopy cover targets.

To further improve accountability Council should reinstate tree removal permits as development applications, as is currently the case with Georges River Council. This will allow Council to more accurately track tree removals on private property and account for saplings that have replaced them. Again, survival rates of these saplings should be accounted for in reports.

## Biodiversity

The data in Council's current Biodiversity Policy is now 30 years old. An updated Biodiversity Policy must be prepared as soon as possible, and incorporated in the Tree and Bushland Strategy.

The draft Strategy notes that there are "86 Critically Endangered, Endangered, Vulnerable and Near Threatened species identified as occurring in the Sutherland Shire." A significant point of concern in the draft Strategy are statements about trees having a 'use by date'. Large canopy trees provide vitally important habitat even in urban environments and old hollows can take 150-200 years to form. The larger hollows which birds such as powerful owls require can take 300 years. Destroying living or dead hollow-bearing trees displaces or kills wildlife dependent on those hollows.

We were recently contacted by a member of the public regarding advice they received from Council about two significant Eucalyptus Pilularis Blackbutt canopy street trees that were cut down because hollows in those trees were deemed a "risk".

Council's advice was that replacement trees would be put in as "part of future tree planting programs". We note that whatever tree is planted 'in the future' will not replace the arboreal mammal habitat lost by removal of these trees.

Even if the same species of Blackbutt are chosen the replacement tree will take many years to grow to reach the same size. If these trees are replaced by Callistemons (which are evident through surrounding streets) these will provide no long-term hollow-bearing potential.



Claims by Council that trees have a 'use by date' should not be used as an alibi to enable an active program focused on cutting down healthy trees. Retaining trees on site rather than replanting saplings elsewhere is also essential to maintaining canopy in residential zones subject to increased density. It needs to be made clear in the new Strategy how Council will retain mature canopy trees with hollows, and once again, what funding allocations will be given to tree removal v's care.

The final iteration of the Tree and Bushland Strategy must be updated to prioritise the retention of hollow bearing trees. This issue must be also taken into account and addressed with an updated Biodiversity Strategy as soon as possible.

## Community consultation and transparency

The draft Strategy states that there should be "Open communication mechanisms... in place for tree and bushland management matters" (see p.37). This aim is admirable, and we would like to suggest a number of areas where Council's current practices could be improved.



First, decisions to remove healthy street trees are currently being made by Council staff behind closed doors at the request of individual residents, and this practice should change. This issue is not raised in the draft Strategy, but under Council's current policy there appears no requirement to inform anyone apart from immediately adjacent neighbours prior to decisions to remove healthy street trees.

Street trees belong to a whole community, yet we now have a situation where any Shire resident could wake up one morning to find street trees they love near their property being cut down, with no notification whatsoever. Some residents have also advised us that they been asked to put in freedom of information GIPA requests to find out the reason why.

Healthy trees should not be removed without informing others in the street just because one person complains. Wider community consultation is vital. We have fielded numerous calls and emails from distressed residents regarding this issue over the last few years.

Studies have shown house prices increase in the lined streets. This should be noted in the Strategy itself, and included in public education campaigns. Cutting down street trees can potentially have an adverse impact on property prices in streets where these mature canopy trees are being removed.

Although our tree canopy is highly valued among most of the community it is clear that a negative attitude and fear mongering is being fostered by others, particularly on social media. Council needs to develop a positive public education campaign as a counter. The language that Council uses matters. Phrases such as "Which Plant Where" (Ku-ring-gai Council), instead of Sutherland Council's "Right Tree, Right Place" is far more positive, and far less inflammatory. Council's "Right tree" slogan inevitably suggests "wrong trees", and this term is more likely to whip up groundless fears.

If Sutherland Council genuinely wishes to increase our canopy cover Council needs to use language which promotes this aim. Ku-ring-gai Council has an "Urban Forest Policy". Willoughby Council has a "Green City Plan". The name "Tree and Bushland Strategy" could be improved.

The creation of a "Significant Tree Register", in line with many other Australian Councils, would also allow residents to identify trees of significant community value, and aid in their protection.

The manner in which Council deals with cases of tree poisoning is also important. Deterrents need to be effective. The signs that went up at Lilli Pilli Point recently were good, but these could be bigger again. Shipping containers are another option being successfully used by Bayside Council. Lane Cove Council has committed to obscuring any view / harbour outlook gained by the destruction of the habitat. Note the message on the sign shown here: "Lane Cove stands tall against tree vandalism". Signs, banners and other deterrents should always remain in place until the trees have grown back. Tree poisoning will cease if these measures are implemented.



A final point on the issue of community consultation concerns Council's Environment and Sustainability sub-committee. Residents are not permitted to attend these meetings, and there are no community representatives. For there to be transparency around Council tree-related decisions this should change.

## Climate Change

It's positive that the draft Strategy notes the importance of climate change and the need for trees to mitigate damaging impacts. Planting trees is one of the simplest ways of tackling climate change. Mature trees sequester carbon and reduce the urban heat island effect, producing shade that prevents the absorption and reflection of heat by hard surfaces such as footpaths, roads and buildings.

With Council's acknowledgement of this issue, the Tree and Bushland Strategy should be reassessed when Council's upcoming Climate Change policy is released. Targets incorporating the need for mature canopy

trees should be updated and revised. This should include clear timeframes to meet canopy cover targets along with funding allocations to ensure those targets will be met.

## Challenges

The draft Strategy notes that Sutherland Shire's population is expected to increase 9% by 2036. Increased density means proactive ways of increasing tree canopy need to be incorporated in Council's plans.

Mature trees require sufficient floor space between dwellings to grow. Deep soil zones with a minimum dimension of 3m are required for the healthy growth of new trees, and the retention of existing trees.

The State government's Apartment Design Guide describes how large trees with large canopies require "deep soil zones", areas of soil not covered by buildings or structures within a development. These zones have 'important environmental benefits', and need to be identified in order to retain existing significant trees, improve amenity, and local microclimates. Council should incorporate such spacing within the new LEP.

Other innovative solutions could include incorporating checkerboard layouts with new carparks, as per the example below.

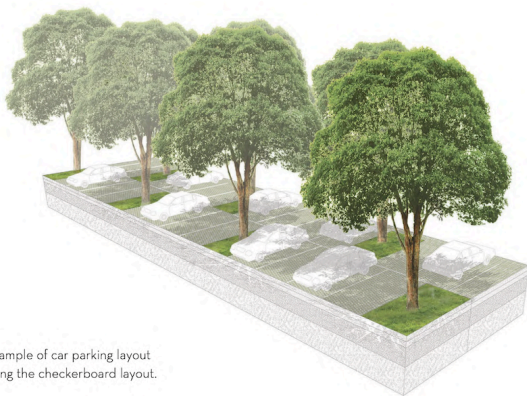


Figure 4: Example of car parking layout demonstrating the checkerboard layout.

Another issue flagged in the case study is the need for better communication between Council and agencies such as Ausgrid and Transport NSW to ensure they do not compromise Council's target of "no net canopy loss". Ideally, reports should be provided to Council on an ongoing basis about what actions both agencies are taking to mitigate impacts on Sutherland Shire canopy.

We believe it would be a huge advance if Council took part in Ausgrid's Aerial bundled cabling program. This requires less pruning compared to exposed wires that need up to 3m of clearance.

Council should also continue opposing proposals from Transport NSW to cut down mature canopy

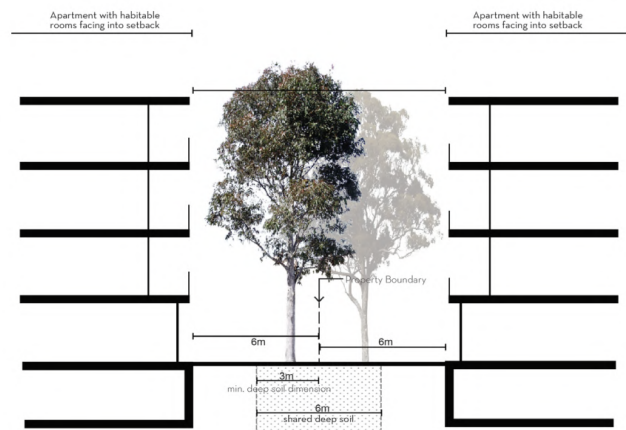


Figure 3: Contiguous deep soil zone within building setbacks.

Gallagher Studio & Studio Zanardo submission to Planning, 2021

It is positive that the draft Strategy includes a commitment for Council to adopt the NSW Government's "Greener Neighbourhood Guide". The "Greener Neighbourhood Guide" in turn states that goals and targets "should be ambitious but achievable and based on evidence to gauge if the goals are feasible for the resources of the organisation."

Unfortunately there is no evidence in this draft Strategy that adequate resourcing will be provided. The Sutherland Council case study in the "Greener Neighbourhood Guide" identifies "a lack of resourcing as the number one problem with its ability to implement no net loss of canopy cover."



trees as part of Transport NSW's decision to reroute the SCATL away from the rail corridor.

We thank Council again for considering this submission and for the opportunity to meet with the consultants who drafted it last year.

Regards,

A handwritten signature in black ink, appearing to read 'Catherine Reynolds', written in a cursive style.

Dr Catherine Reynolds  
Sutherland Shire Environment Centre