



Sutherland Shire Environment Centre

SSEC

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Comment On Sutherland Shire Council Draft Operational Plan 23/24

The Sutherland Shire Environment Centre (SSEC) was founded over 30 years ago with the express purpose of ensuring that the natural attributes of the Shire are looked after and can be enjoyed by future generations.

We have major concerns as to whether Council's proposed Operational Plan for 23/24 is adequate to address the many environmental problems impacting our local area. In general terms, the draft plan has a number of notable problems:

1. Many environmental goals and targets are extremely weak and lack proper performance measures.
2. Measurement and reporting of outcomes is often non-existent.
3. Supporting documentation for key plans is frequently not provided.
4. Many specific environmental plans and strategies are seriously out of date but are not flagged for review.
5. Promised reviews of existing policies have not occurred.
6. Key panels and committees have no community representation.

Detailed comments on key aspects of the draft plan are provided below:

Section	Key Concerns
2E Manage Promote/enhance tree canopy in urban and natural areas (page 48)	<p>Council passed a new Urban Tree and Bushland policy in 2021. It mentioned the need to "enhance and protect diverse natural habitats". Yet the Council staff report advised the policy would likely result in an increased number of trees across the Shire being removed every year, with estimates of over 250 more than usual likely to be removed.</p> <p>The policy had a stated goal of "no net canopy loss" but did not make it clear how this objective would be achieved, whether requirements for replacement planting would be met, or</p>

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	<p>properly monitored. No information is currently available to residents about canopy mapping and how much is being lost or retained.</p> <p>The staff report on this policy flagged concerns about "resourcing". This suggests Council simply does not have the staff necessary to properly follow up re a whole range of issues, including whether replacement plantings are being put in, or properly maintained. Other Councils (such as Wollongong) use spatial mapping and other tools to accurately monitor changes in canopy cover.</p> <p>There have been cases of illegal tree removals that have taken over a year to investigate. The community receives no reports about outcomes. What impression does this give? Illegal tree removal and tree poisoning is a criminal offence. It is not apparent Council is taking effective action to combat this or to provide any serious measures that would provide practical disincentives to such actions. Other Councils have adopted innovative practices in the case of tree poisonings such as erecting large signs or installing shipping containers which are left in situ until new trees grow in place of the ones poisoned.</p> <p>Another concern is how the Urban Tree and Bushland policy established a panel of Council staff to deal with requests to remove street trees that Council's own arborists have reported to be healthy. The panel's decisions are made behind closed doors. The results are not advertised.</p> <p>Any Sutherland Shire resident could wake up one morning and find a loved street tree removed without any notification whatsoever.</p> <p>A review of the tree policy was supposed to have been carried out 12 months after it was implemented. This has not occurred.</p> <p>Saplings take many years to replace the canopy lost by the removal of mature trees. Hollows in older trees, which provide homes for a range of wildlife, can take over 150-200 years to form. Critical habitat is being lost.</p>
<p>2F Strategies to enhance environmental conservation and diversity (page 49)</p>	<p>Council's Biodiversity Strategy is 23 years old and completely out of date. It was published in 2000, based on 1995 data. Council needs to commission a contemporary scientific Biodiversity Study to inform a proper Biodiversity Strategy. Other Councils have this, and it is a critical document required to underpin Council decision making. This should be listed in the current draft Operational Plan.</p> <p>Too often urban biodiversity is dismissed as unimportant. But a 2020 ACF report has found 'Almost half of Australia's national-listed threatened animals and a quarter of the plant species at risk are found in the largest towns and cities' (see</p>

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	<p>https://www.smh.com.au/environment/conservation/miracles-in-our-own-backyards-rare-urban-ecosystems-on-the-brink-20200804-p55ifq.html)</p> <p>We have a number of threatened, vulnerable, and even critically endangered species in the Sutherland Shire, including koalas, Grey headed flying foxes, and critically endangered Eastern Curlews.</p> <p>There is no mention of reviewing Council’s Environment and Sustainability Strategy either. This was published in 2012, is also out of date, and refers to redundant policies and plans.</p>
2F Koala Plan of Management (page 49)	This plan has no project milestones, no target dates, and no supporting documentation. Instituting this Plan of Management does depend on the NSW government applying the Koala SEPP to the Sutherland Shire, however it is not apparent that Council is prosecuting this goal in any way.
2F Review and revise the GreenWeb Strategy (page 49)	Again, there are no project milestones or supporting documentation. The current GreenWeb Strategy is not available on the Council website.
2G Develop and implement the Catchment and Waterways Strategy and Implementation Plan (page 50)	<p>This is listed over 3 financial years, there are no project milestones, no supporting documentation.</p> <p>The preliminary survey Council prepared for its draft Catchment and Waterway Management Strategy and Implementation Plan featured serious deficiencies. It minimised the importance of environmental considerations, when the premise of a catchment management plan requires these be given priority. See https://www.ssec.org.au/wp-content/uploads/2021/10/Council-CatchmentSubmission.pdf</p> <p>Council has an important mandate in preparing this management plan as required by the NSW government’s Coastal Management planning framework – the Coastal Management Act 2016, and the State Environmental Planning Policy (Coastal Management SEPP) 2018. The emphasis here is on “ecologically sustainable development” which:</p> <ul style="list-style-type: none"> • protects and enhances sensitive coastal environments, habitats and natural processes; • strategically manages risks from coastal hazards and responds to climate change; • maintains and enhances public access to scenic areas, beaches and foreshores; • supports the objectives for our marine environment under the Marine Estate Management Act 2014;

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	<ul style="list-style-type: none"> protects and enhances the unique character, cultural and built heritage of our coastal areas, including Aboriginal cultural heritage. <p>It is not clear that Sutherland Shire Council is meeting these legislated requirements.</p> <p>Another example of Council not meeting its obligations relates to the outdated 1991 Woronora River Flood Study. Council only agreed to undertake this study in March this year, but there is no mention of reviewing the Woronora River Floodplain Management Plan. This document, published in 1995, is also out of date and not based on any of the contemporary Climate Change data modelling. Recent major flooding resulted in extensive damage to homes and property in the Woronora River Valley.</p> <p>Likewise, there is no mention of improving Community resilience to increasingly frequent and severe flood threats in areas subject to flooding across the Shire. These range from Woronora to Bundeena, and Taren Point.</p> <p>In relation to Woronora, the only available documentation on Council's website is the Woronora Flood Preparedness Program Effectiveness Review dated 2004. This document refers to an incomplete community preparedness program from 1999.</p> <p>Similarly, the current Woronora Stormwater Management Plan was published in 2000. There is reference to it in Council's Environment and Sustainability Strategy 2012, which stated that the Woronora Stormwater Plan was out of date in 2012. Considering the impact of stormwater during the 2022 Woronora Flood events and the La Nina extreme rainfall 'rain bombs' this management plan needs reviewing urgently.</p>
What you told us (page 41)	<p>Council uses a community survey to rate the importance of and satisfaction with various environmental outcomes. However, unlike many other councils, it does not adequately measure or report on actual performance, making it very difficult for the community to make an informed assessment.</p> <p>It is also noted that there is no community representation on the Council Environment and Sustainability Sub-Committee, which provides advice to Council on a wide range of environmental matters. The Charter of this Sub-Committee should be changed to include representation from local Environment groups, and the First Nations community.</p>

I urge Council to address these shortcomings in the draft Operational Plan, and take more meaningful action to deliver positive environmental outcomes for our local area.

Yours sincerely

Ian Hill
Chair
7/4/2023