

**Submission
No 120**

**INQUIRY INTO PLANNING SYSTEM AND THE IMPACTS
OF CLIMATE CHANGE ON THE ENVIRONMENT AND
COMMUNITIES**

Organisation: Grow Urban Shade Trees GUST

Date Received: 3 November 2023

Grow Urban Shade Trees – submission



Portfolio committee No. 7: Inquiry into the planning system and the impacts of climate change on the environment and communities

Dear Ms Higginson:

Please accept our group's submission for the above inquiry.

We have summarised our **concerns, ideas and suggestions** according to the media release of 30th August, 2023.

Firstly, who are Grow Urban Shade Trees (GUST)?:

GUST formed in 2016 to address the distressing gap in action around building and retaining urban canopy on the NSW Central Coast.

Self-funded, GUST are a growing group of residents living on the Woy Woy Peninsula, where the urban heat island effect is one of the worst, due to a profound lack of canopy cover (less than 10%).

Action and resources from Central Coast Council remain virtually non-existent, which sits in stark contrast to other more progressive Councils. GUST has therefore, had no choice but to:

- lobby council for systemic change
- provide the community with education and a tree planting program.

Fuelled by only small donations and volunteer effort, GUST has proven that the community want trees and that providing them is entirely possible. In a climate emergency, it is disgraceful that such vital health infrastructure has been left the responsibility of volunteers.

In the past 7 years, the team has helped residents adopt over 860 shade trees.

- **How?** residents can respond to our letter-box-drops or via our Facebook page. GUST volunteers then consult to give householders a choice of shade tree, check for in-ground services, check for power lines overhead and plant a tree in a protective box of recycled timber (see photos). Residents may choose to make a donation for GUST's efforts to cover basic costs. Importantly, residents agree to water their new tree.

We have observed that when our Council staff plant trees, they rarely have the resources to water them, thus have a higher failure rate. Also, residents get annoyed for not being asked if they want a street tree or asked to opt out.

We list GUST's responses to the questions posed:

"...planning bodies can make appropriate decisions that avoid increasing the risks of harmful effects on the environment through development"

As Central Coast Council has been in the hands of three successive administrators since the forced amalgamation process by the NSW Government, the following planning instruments have yet to be adopted (In accordance with the Local Government Act 1993, the **Community Strategic Plan (CSP)** must be adopted by 30 June in the year following a local government election. As per this legislation the CSP will be adopted by 30 June 2025. The **Local Strategic Planning Statement (LSPS)** will be adopted alongside the CSP subject to endorsement from the State government):

The LSPS is a 20-year land use planning vision for the Central Coast Region, which identifies the long-term planning needs and priorities of the Central Coast community, including housing provision, environmental conservation, transport, servicing and infrastructure, open space and recreation, community services and other relevant planning considerations. Together, the CSP and LSPS help guide the delivery of social, environmental, and economic objectives of the community. **GUST wonders, will these be effective?**

https://www.yourvoiceourcoast.com/sites/default/files/2023-09/local_strategic_planning_statement_2020.pdf

https://www.yourvoiceourcoast.com/sites/default/files/2023-09/community_strategic_plan.pdf

GUST draws the inquiry's attention to the following:

“...examine the adequacy of planning powers and planning bodies to review development approvals, taking into account the cumulative impacts of...

- development,

Central Coast Council has been in the hands of three successive administrators since the forced amalgamation process by the NSW Government. As residents, we have seen too many non-compliant developments being approved. In 2021, a planning panel was established to adjudicate on development applications that attracted 10 or more submissions. On The Peninsula, Pearl Beach and Patonga residents groups have had to become more active in ensuring DA's compliance is followed, sadly, rarely successfully.

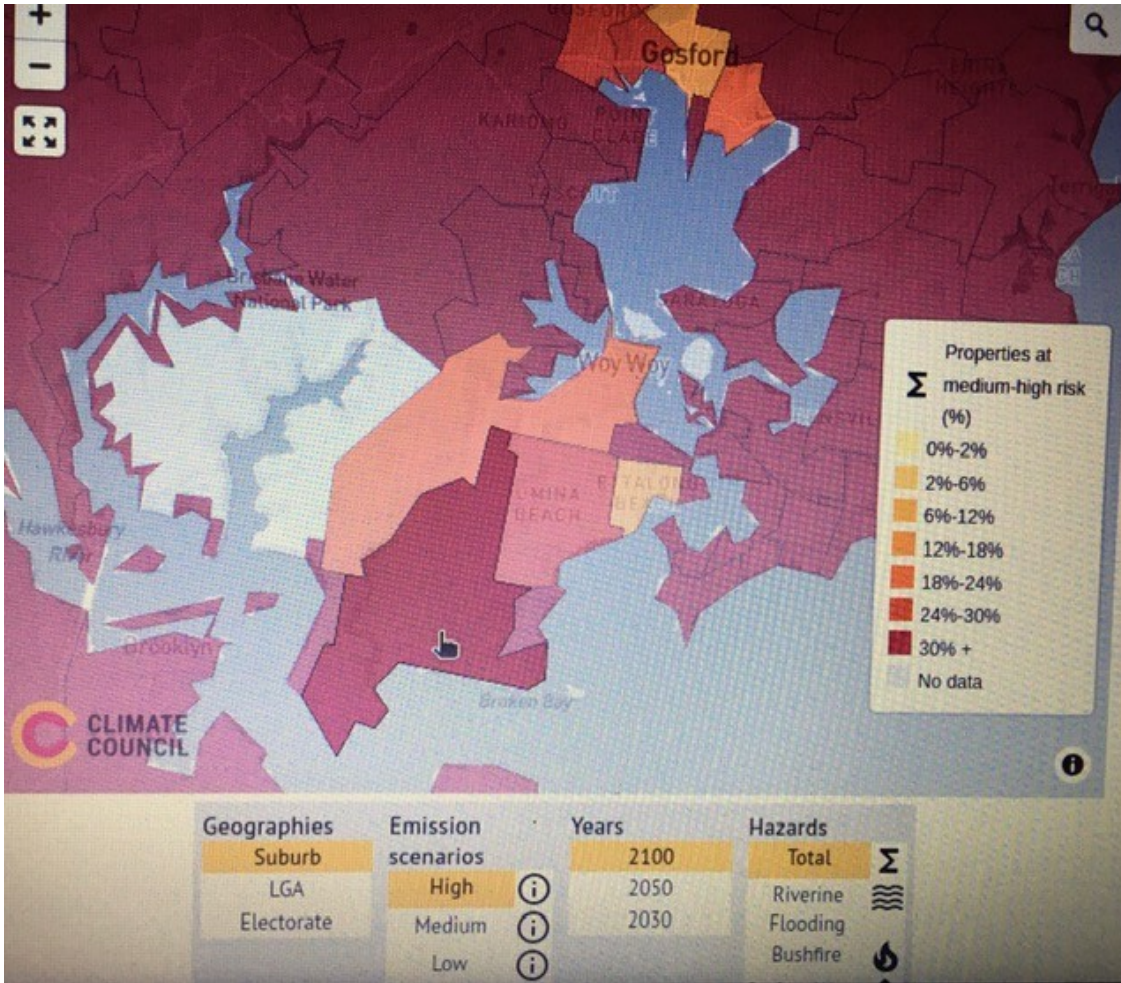
We appreciate the pressures placed on Councils by State and in turn Federal housing targets. This does not mean groups such as GUST is against development, we just want compliances adhered to and some imagination used by planners, developers and architects to work around existing trees and mature gardens as well as promoting new shade as a design essential.

Refer to the attached Greener Places Strategy:

https://www.yourvoiceourcoast.com/sites/default/files/2020-06/D13569455_Central_Coast_Greener_Places_Strategy_external_document_v2.pdf

Urban heat island maps (the Peninsula is one of the hottest) – see pages 26-27

This heat map image of Woy Woy to Umina is from the Climate Council's website:



- climate change,

As mentioned above, because of increased urban density, canopy loss, more hard surfaces/tin fences etc on our coastal sand plain (same as for Long Jetty and others), our average temperatures have been researched as 5 degrees higher. Some parts of The Peninsula are designated flood zones which attract stiffer development codes – refer link.

https://cdn.centralcoast.nsw.gov.au/sites/default/files/2023-08/d15683203_woy_woy_frmf_final_rev0_r1_adopted.pdf

CENTRAL COAST COUNCIL'S website states:

“The Central Coast is known and loved for the abundant, diverse bushland and natural environment.

Trees and vegetation on private land, form an integral part of the local atmosphere and appropriately managing these contributes to the protection of our wildlife, biodiversity, and liveability of the Central Coast. At times, trees on private land will require pruning or removal and, where possible, replacement with suitable species. The following information provides the process that is to be followed in each circumstance.

In 2021 the State Government introduced a new [State Environmental Planning Policy \(Biodiversity and Conservation\) 2021](#) , which replaced the clauses relating to trees in Council's LEP. The [Central Coast Council Development Control Plan 2022 \(DCP\)](#) is enacted by State Environmental Planning Policy (Biodiversity and Conversation) and reflects its requirements.

On 23 February 2021, Council adopted a [new policy to manage tree and vegetation vandalism](#) that ensures a consistent approach to the management of vandalism of trees and other vegetation on public land. The policy was updated following feedback from the community late last year, it reinforces our commitment to protecting our natural environment and gives us a range of tools, including education and enforcement, to manage unlawful damage to trees and vegetation.

This information is designed to ensure residents are directed to the correct agency to assess their vegetation matter, or ensuring the correct form is completed. This will require some checking by residents however the links provided should assist in undertaking these checks”.

The Central Coast Council has a policy governing the removal of trees:

See <https://www.centralcoast.nsw.gov.au/residents/property/trees-and-vegetation>

- natural disasters

The Peninsula is also vulnerable to east coast low pressure systems from the warming of the central Pacific Ocean, Urban heat is the natural hazard that kills the most people (Doctors for The Environment).

Central Coast Council is funded to support several local Dunecare sites on our local beaches to stabilise dunes, meaning if there is no prevention, there is erosion. There is vastly inadequate dune vegetation and questionable tree removals on our foreshores (beaches and Brisbane Water).

- biodiversity loss

The rare and endangered Umina Coastal Sandplain Woodland next to NRMA's Big 4 caravan park at Umina is the only protected bio-diverse remnant left on The Peninsula. GUST is left to plant street trees for agreeable residents to advance a variety of these species and in turn, educate residents as to their value, not just for shade but also for the benefit of our birds and pollinators.

The Peninsula is enclosed by two national parks (Bouddi and Brisbane Water) and several nature reserves of which the latter, Council maintains. Central Coast Council promotes how many parks residents have access to (and many do) reflected in their maintenance budget but in recent years, the Administrators have declined to accept any new nature-based facilities that would attract cost to that budget.

35 years ago, foresighted Gosford councillors established COSS (Coastal Open Space Scheme) specifically to protect forested ridgelines from development. This, in turn, gives residents and visitors the impression of green-ness. However, it is the streets where people live that have become deserts of less biodiversity, greater heat and little shade.

With the amalgamation of Gosford and Wyong councils, the funds held in trust for the maintenance of COSS lands has been subsumed into general revenue. COSS lands are unique in NSW and we are very grateful for those former councillors despite none near the Peninsula.

- changing social

Central Coast Council have been told by NSW Planning to prepare for an additional 76,000 residents by 2036. The 2027 Census should show a dramatic change in density of our area.

From the 2022 Census, the demographics of the Peninsula are summarised:

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/POA2256> (Woy Woy, Umina, Pearl Beach & Patonga)

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/POA2257> (Ettalong Beach, Booker Bay and Daleys Point)

- *economic*

CCC has been restructured as part of the amalgamation process. Consequently, GUST is aware of the new structure impacting on canopy loss. In the Tree Management team we only see action on tree removal approvals with no process for planting replacement trees and no street tree planting program. Hence, this tree loss is having a devastating impact on the loss of tree canopy. Without a budget for tree planting, we are well behind other proactive councils in restoring canopy.

Central Coast Council administrator Rik Hart declared **no** new parks or amenities will be built that will **cost their budget** in the future.

However, Council's endorsement of the Central Coast **Green Grid Plan: Our Place**, in August 2022, introduced a strategic planning document which should be providing a mapped framework for future place-based planning on the Central Coast and examines the key natural environmental attributes of the region.

GUST is yet to see where this GG Plan has been enacted, certainly not on The Peninsula. To date, apart from the attached PDF below#, there is little education resources for residents. If there are no green corridors, there will be no canopy – there will be greater urban heat and health risks.

A noble aim certainly? “first of its kind for regional NSW, the GG Plan aims to deliver an interconnected network of open space that will keep the Coast's major centres cool, encourage healthy living, enhance biodiversity and ensure ecological resilience.”

Refer: <https://cdn.centralcoast.nsw.gov.au/sites/default/files/reports/central-coast-green-grid-2020.pdf>

and environmental circumstances

While canopy loss is GUST's first concern, The Peninsula (Woy Woy, Booker Bay, Ettalong Beach and Umina) was officially declared to now be **flood prone**#. Various streets on the waterfront of Woy Woy have been flooded on king tides and/or east coast lows for many years. Canals are in place to assist drainage but deliver unclean water into channels. In 2019, Woy Woy's pelican researcher Wendy Gillespi says pelican deaths in the Brisbane Water area were continuing to worsen and had to plead with the NSW EPA to investigate. The culprit is most likely toxins seeping out from under Woy Woy Oval that was a tip 80 years ago and now a sports facility.

Our concern is about continued tree loss which, apart from increasing the heat island effects, trees help soak up excess water and stabilise waterfronts, particular under the south Woy Woy and Umina escarpments to drain Etta Creek south towards Pittwater or north to Correa and Phegans Bay.

Refer #:

https://cdn.centralcoast.nsw.gov.au/sites/default/files/2023-08/d15683203_woy_woy_frmp_final_rev0_r1_adopted.pdf

WHAT CAN THE PLANNING SYSTEM DO IN THE SHORT TERM?:

The inquiry must look at the adequacy of Council planning powers:

We ask that Ms Higginson, the chair of the Portfolio Committee No. 7, look at the weakening of the Central Coast Development Control Plans (CCDCP) which allow the total removal of all vegetation on a residential development site (see attached **photos page 12**).

The CCDCP must enforce the retention of boundary trees where the tree is healthy.

The CCDCP must retain the existing street tree.

The CCDCP must increase setbacks to allow for deep soil planting of canopy trees.

The CCDCP must not allow the greater part of the footprint to be concreted (see attached **photos – page 11**) but determine the percentage of the site to be landscaped.

These changes will mitigate canopy loss, mitigate loss of wildlife corridors and habitat, reduce heat impacts of hard surfaces, reduce water run-off and mitigate urban heat.

The cumulative impacts of the combination of weakened planning rules, self certification of developers, a local planning panel that is not strict on implementing best practice urban design, will result in an unhealthy, unliveable environment for future generations.

Locally - ENACT the Greener Places Strategy by:

- prevent the destruction of mature trees for medium density development by way of incentivising improved and creative design standards (visit Pearl Beach);
- promote tree protection and planting;
- reinstate more arborists AQF5 and greater with only AQF8 qualified staff to approve tree removal applications;
- educate staff about the consequences regarding the loss of shade on our streets and yards;
- alert Council about the dangers of **>5 degree rise in temperature on The Peninsula*** known as heat-island-effect (*Woy Woy, Blackwall, Umina, Ettalong Beach and Booker Bay) Refer also to the link to Council's **Greener Places Strategy**, formally adopted in August 2022.

MEDIUM TERM?:

- Central Coast Council to encourage the upholding of their Greener Places & Green Grid strategies (refer web link below).
- planners to be consistent in approving DA's and tree removal/retention\ and/or replacement.

While GUST understands the NSW Planning's ambitions for denser housing to meet both State and Federal Government's housing targets, Councils can struggle to maintain standards which appears to have become commonplace on the Central Coast. Since the amalgamation, many senior planning staff have either retired or taken redundancies which in turn has brought less experienced staff from the former Wyong Council into the departments.

Our group and others feel much can be done to improve home designs away from fence-to-fence Lego-block flats that are replacing stand-alone homes on small house blocks. For instance, between 2019-2022, GUST has identified 295 tree removals on the Peninsula via Tree Applications, though this figure doesn't include the likely higher number of trees removed via Development Applications.

Between 2005-2014, **canopy cover in Woy Woy decreased by 173ha, impervious surfaces increased by 84ha and unplantable space increased by 113ha.**

Council's adopted **Green Places Strategy** states: *"this pattern of land cover change, particularly the significant tree canopy loss, has substantial implications for the future liveability...and the health and wellbeing"* of the urban environment and local community.

- remedy Council's budget for urban greening which is standard in other NSW councils
- missing elements their planting street trees to include maintenance and replacement.
- most importantly, remove street trees from their roads to parks department or at the very least, have them working better hand-in-hand.

We await the 2024 Council elections to then work with elected representatives of our area to drive compliance with DA's, greening and planning. Our group is hearing "noises" about how local developers have been pushing non-compliant buildings in advance of council elections in late 2024. They may also be recruiting candidates to stand for councillor positions to maintain access to the approvals process?

LONG TERM?:

- Councillors (when elected in late 2024) to promote, educate and protect the value of shade, street and other trees in all areas of Central Coast.
- expand the tree planting activity;
- implement the Greener Places Strategy and fund it properly. There is only \$40,000 allocated for the entire Central Coast this year!

GUST members thank:

Peninsula Environment Group members for their support.

** GUST acknowledges Dr Libby Gallagher's "Cool Streets" project with Blacktown Council.

<https://www.coolstreets.com.au/team>

Prof Michelle Leishman's team "Which Plant Where" by Dept Biological Sciences, Macquarie University. <https://www.whichplantwhere.com.au/>

*****Peninsula News article, October 2023**

Reframing Trees to improve liveability, aesthetics and property values

*Trees are not the enemy, but urban heat certainly is. There is a long-standing distrust and aversion to trees in urban areas and local community group **GUST** (Grow Urban Shade Trees) is on a mission to shift that culture.*

The Peninsula is an identified Urban Heat Island, which experiences temperatures almost 5°C hotter than surrounding leafy suburbs. Though it's a flat area, walkability is greatly impacted by the lack of shade and extreme heat. Where residents could happily do some exercise, save fuel, reduce emissions and combat overcrowded carparks when headed to the beach, they are forced to drive because walking is currently an unsafe option.

*The Peninsula has long been a hot and bare area following a history of sandmining, land for a WW2 aerodrome and urbanisation. **Records as far back as the early 1900's show complaints and strategies in place to plant street trees and green the area** – so why are we still suffering? There are many answers to that question but some key points to consider are the poorly planned rezoning of much of the area to medium density, poor development controls, a historically lower socioeconomic demographic lacking time and resources to address the issue and a culturally ingrained fear of trees.*

Trees offer myriad benefits, not only providing much-needed shade to an area with less than 10% canopy cover, but also to our pockets. Trees increase property values (look at Pearl Beach, Killcare or Macmasters for proof) and reduce energy consumption. They also improve physical and mental health and increase habitat value for local wildlife.

So why the fear? Did you know that your chance of dying from a tree or branch falling is 1 in 5 million? Meanwhile, heat-related deaths can account for up to 10% of total deaths in hot seasons and locations. Selecting the right tree for the right place is important. We desperately need trees, tall enough to shade hot, impervious surfaces such as roads and dark rooves, to be planted in gardens and on nature strips. Where you're concerned about the health or structural integrity of a tree, contract a knowledgeable and accredited arborist to undertake 5-yearly health checks. Trees come in all manner of styles, shapes and sizes and there are so many beautiful species which GUST could help you select for your garden or nature strip – just reach out.

Central Coast Council have a poor history of tree retention and planting on the Peninsula.

Between 2019-2022, GUST have identified 295 tree removals on the Peninsula via Tree Applications, though this figure doesn't include the likely higher number of trees removed via Development Applications. Between 2005-2014, canopy cover in Woy Woy decreased by 173ha, impervious surfaces increased by 84ha and unplatable space increased by 113ha. Council's adopted Green Places Strategy states that "this pattern of land cover change, particularly the significant tree canopy loss, has substantial implications for the future liveability...and the health and wellbeing" of the urban environment and local community.

8

Objectives of Council's Greener Places Strategy include strengthening the processes around tree protection and replacement and improving liveability via planting and green urban design – so when are we going to see this? In a comparative analysis of Central Coast Council's urban greening, GUST looked at Lane Cove Council's street tree planting figures for 22/23 Financial Year. Lane Cove Council planted 249 street trees in an area of 10.5km² with a population of 40,534. According to Central Coast Council, they have planted up to 80 street trees in an area of 1,681km² with a population of 348,930 people.

So, what can you do to help?

▮ *Plant more trees in your garden and nature strip! Retain trees, design developments around existing trees and contract AQF5+ arborists as needed.*

▮ *Complete Council's important online survey by 16 October 2023. Ask for green urban design, urban planting and tighter development controls with regards to landscaping requirements.*
www.yourvoiceourcoast.com/CSPandLSPS

▮ *Email ask@centralcoast.nsw.gov.au and ask for immediate implementation of the Greener Places Strategy and call for a stop to unnecessary tree clearing on the Peninsula.*

▮ *Join the Peninsula Residents Association to help keep developments in line with the "leafy character" our suburbs are supposed to maintain and to ensure our suburbs are habitable and climate ready.*

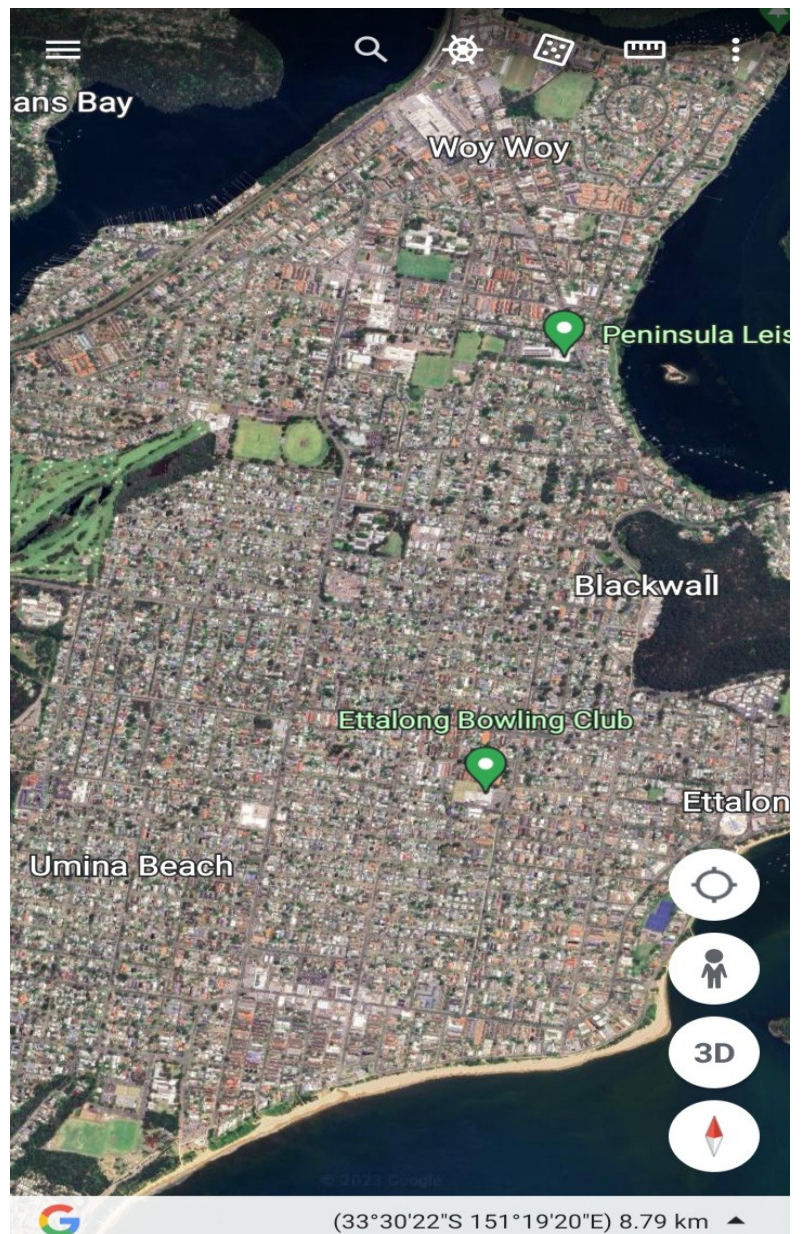
Sources:

Myth Busting Our Trees - Conservation Council SA (conservationsa.org.au) Year in review | Lane Cove Council (nsw.gov.au)

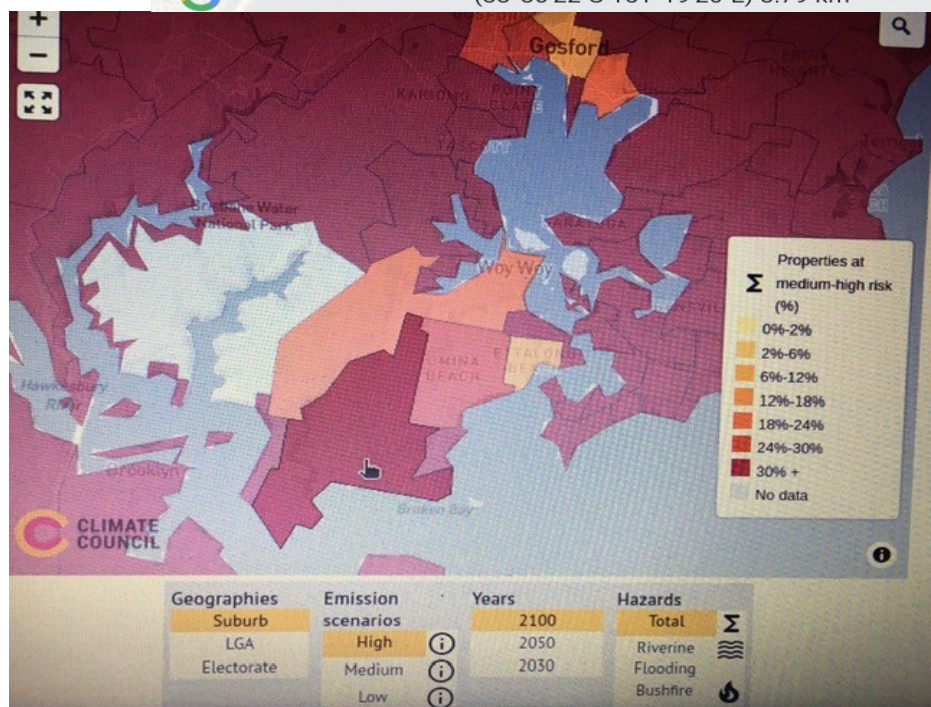
Central Coast Council - Greener Places Strategy & private emails

Photos:

Woy Woy to Umina "peninsula" from above showing vast areas of low canopy cover



Urban heat map
of the same area:
(Climate Council website)



GUST will keep working with the Peninsular residents for more canopy cover - **FROM THIS TO THIS**

Karingji St, Ettalong Beach

below **without** and opposite end of the same street **with shade** – 4 degrees cooler!



Demolition destruction “moonscapes” and hard surfaces (driveways & fences) reflecting heat



170 & 170A West St, Umina by Acrow P/L – the worst example (should have been stopped by Council).



Fully concreted block, Booker Bay with “Lego” block design with no room for even a weed!



Umina townhouses with tin fence hard up against the back room and on a rear landway – no room for any plants.

Fully concreted house block with tin fences



Stripped out house blocks with no effort to retain trees let alone gardens:

260 Trafalgar av
Umina Beach



55 Springwood st Ettalong



8 Cambridge, Ettalong



Two examples of mature trees demolished & to date, not replaced:



King St, Umina – healthy tree destroyed for too much leaf drop!

163 Barrenjoey Rd, Ettalong Beach – fig tree destroyed for being a trip hazard!



New GUST trees for resident's verges:

3 "ivory curl" trees adopted in Ridge St, Ettalong



Golden penda – Kourung St, Ettalong Beach



Adoptee with her new GUST street tree



Resident of Farnell Rd, Woy Woy with GUST volunteer & firewheel tree



Residents of Flathead Rd, Ettalong with their new golden penda.

GUST members thank Ms Higginson and members of Portfolio Committee No. 7 for the opportunity to contribute to our area and look forward to learning what transpires.

GUST will continue to improve liveability and reduce the heat island effect by planting more trees and preserving mature trees. We will educate, inspire & partner with residents, developers, councils and local businesses.

