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Attention: Fleur Rees

7 July 2022

Dear Fleur,

RE: Draft Ku-ring-gai Urban Forest Strategy

We thank Council for giving us the opportunity to make a submission on the above draft strategy.

We understand “*the Ku-ring-gai Urban Forest Strategy will guide how Council manages and enhances its urban forest into the future. It sets out clear targets and directions on how we can protect our existing tree, vegetation and soil assets and do more to increase our canopy coverage and urban forest extents.*”

We also understand that the Ku-ring-gai Urban Forest Strategy “*will sit alongside other key council documents and aims to align with State Planning directions, including the North District Plan and the Ku-ring-gai Local Strategic Planning Statement as well as recent policies and strategies that have been prepared for and by Council*” which, we understand, is clearly to drive far more urban development in Ku-ring-gai in meeting State Government onerous and ongoing housing targets.

Most Sydney councils are losing urban forest cover, not the least Ku-ring-gai. Development pressures, poor planning and a failure to value trees have been blamed for the decreased tree canopy in parts of Sydney even as councils develop urban greening strategies, and the State Government seeks to plant millions of trees by 2030!

It was reported in the Sydney Morning Herald 20 March 2022, that Data from the Centre for Urban Research at RMIT University and Greener Spaces Better Places found the City of Ryde (-6.9 percentage points), Burwood (-6) and City of Canada Bay (-4.4) councils lost the most urban forest cover between 2013 and 2020. More leafy councils such as Ku-ring-gai (-2.4), Willoughby (-3) and Hunter’s Hill (-4.1) also had less tree canopy in 2020 compared to 2013.

To guide this strategy, council will need to closely address over development and planning issues directly with the current State Government - a NSW government which continues to forcefully drive inappropriate urban consolidation policies allowing for significant removal of indigenous trees and other canopy trees particularly along the Pacific Highway and St Ives ridgeline and now potentially into single residential areas across Ku-ring-gai with the low-rise housing code.

The latest changes are to suit the development industry over community interests. In a new announcement made by the NSW Planning Minister Anthony Roberts a few weeks ago, he scrubbed the Design and Place State Environmental Planning Policy, a policy package designed to improve liveability and sustainability. This policy change of direction has weakened to a further extent the ability for councils to manage development in an orderly way. This will enable more flexibility for developers to have greater control over development and the environment. The dropped SEPP also included improvements to the state's BASIX building sustainability standards.

It is clear urban consolidation policies set by the State Government are the major cause for loss of canopy in Ku-ring-gai and other areas of Sydney. Top-down bureaucratic policies and planning directions allowing developer driven overdevelopment, has been particularly damaging to Ku-ring-gai's indigenous tree canopy in removing significant numbers of remnant forest trees for apartment blocks.

The hypocrisy of the planning regime in NSW, in that the State Government continues to push through weakened planning policies to facilitate development, clearing of land, greater built upon areas, enforcing R3 zoning on councils, the 10/50 tree clearing regulation on one hand while promoting tree retention on private property on the other. How can council realistically keep managing the amount of tree canopy loss which government urban development policies allow?

The council's urban forest strategy sets a target but does not state the deadline for reaching the target. The Strategy makes mention of a ten-year strategy. We assume this means the target is to be reached over that time. We would like to see a definite time frame set to reach the target and clearly stated from the beginning of the strategy.

Whilst we clearly support the urban forest strategy, community education is identified as being an important factor in the Strategy. There needs to be community education in referring to the increased value of real estate in treed property and tree lined streets e.g. the AECOM study <https://aecom.com/brilliantcityinsights/brilliant-cities-insights-greening/>

We would also like to see the Strategy strengthened. The priorities given for action plans are unsatisfactory - an audit of tree age, condition and SULE values of trees on public properties should be a high priority in the short term. This would form the base line for implementation of the Strategy.

Another important factor in protecting existing trees, vegetation and soil assets and to do more to increase our canopy coverage, is to place existing powerlines underground. We understand that the cost of undergrounding power lines is prohibitive for most councils. We believe this cost should be partly funded by the State Government as the NSW government is responsible for major loss of canopy, soils and vegetation due to inappropriate planning legislation and policies being imposed on council.

There also needs to be far more community education in the value of planting indigenous plants and trees in Ku-ring-gai to encourage and to help to minimise the effects of climate change and in minimising the heat island effect from over development and to protect wildlife. Ku-ring-gai has a responsibility to protect and retain the wonderful fauna and flora unique to Ku-ring-gai for future generations to enjoy and appreciate.

Ku-ring-gai's indigenous tree canopy will not survive at the current rate of tree loss by council just replanting trees on nature strips and in parks and reserves. With the suburban garden landscape current trend to minimise the planting of indigenous trees and plants in gardens and with planting easy care exotics instead, the trend of indigenous tree canopy, vegetation, soil and wildlife loss will continue in Ku-ring-gai without clear policy changes at the NSW Government level and by council led changes. Council needs to ensure that council policies encourage replacement of indigenous trees to match the soil types in Ku-ring-gai when residents replant following building and other applications.

Soil loss is also significant particularly the loss of Glenorie Erosional soil areas along the Pacific Highway and St Ives ridgeline of Ku-ring-gai. This is where we understand most of the soil and tree canopy loss has occurred from inappropriate urban development particularly with regard to Blue Gum High Forest (BGHF) and Sydney Turpentine Ironbark (STIF) canopy trees.

Deep soil excavation for underground parking in apartment buildings, causing canopy trees (which are protected under State and Federal legislation), soil and seed bank to be removed and replaced by cavernous concrete areas. This type of urban development allows for little tree canopy replacement due to what we believe to be minimal areas set aside for sufficient deep soil areas for canopy trees to survive long term.

Retaining seed bank is critical to the survival of indigenous species. Much more needs to be done within the Strategy to protect critically endangered ecological communities and the sensitive soil that contains the growth medium crucial for plant establishment, survival and care.

There are still no recovery plans in place, that we are aware of, to ensure the long-term survival of the BGHF ecological community which is critically endangered. Council needs to ensure that a recovery (or similar) plan is put in place to save this species. Sadly, we believe there is no will by either the State or Federal Government to steadfastly protect the BGHF critically endangered ecological community as population, planning policies and legislation are currently working against the long-term survival and protection of the BGHF in NSW.

With only 1% or less remaining of the ecological community remaining, more needs to be done by government and council to ensure that plans and funding is allocated to protect and care for endangered ecological communities and wildlife under its care.

There needs to be stronger deterrents and fines in place for illegal removal of trees in Ku-ring-gai. More needs to be done to ensure powerline clearance pruning is monitored and reported to the utility provider. Trees are being lost from inappropriate and heavy pruning and are not being replaced or replaced in a timely way.

As stated earlier, we support the draft Strategy but believe it needs strengthening. It will be very important for councillors to allocate and budget an appropriate amount of funding to the Strategy for the next ten years.

We hope the views expressed in the submission will be considered and implemented following council's assessment and reporting back to Council.

Your sincerely

Kathy Cowley  
PRESIDENT

cc Mayor and Councillors

cc The Hon Jonathon O'Dea MP Member for Davidson

cc the Hon Alister Henskens MP Member for Ku-ring-gai

cc The Hon Paul Fletcher MP Member for Bradfield