

The following provides a summary of the thirty-six (36) submissions received. The submission numbers are provided for each topic (in bold) to identify which submitter raised the topic and show the number of submissions that raised the topic. At the end of the summary, there is a table correlating the submission number with who lodged the submission. This summary seeks to capture topics contained in the submissions and group topics wherever possible, provide a clear and relevant response and recommendation for changes to the Greening Strategy.

The draft MidCoast Greening Strategy and draft Vegetation Management Policy were on exhibition at the same time from 17 May 2021 to 24 June 2021. The submissions have been grouped according to topic. Given that a priority action of the draft MidCoast Greening Strategy is the introduction of a Vegetation Management Policy, there is some overlap of topics.

Summary topic:	Summary of submissions and response:	Response and recommendation
Support or partially support the draft Greening Strategy	Submissions supporting or partially supporting the draft Greening Strategy and identified actions. (Submissions: All submissions)	Support for the draft Strategy is noted. Recommendation: no change
Funding for the draft Greening Strategy	Concern that the draft Strategy identifies that there is no foreseen net increase in funding. Council needs to adequately fund the implementation of the Strategy and provide funding to environmental projects. (Submissions 3, 13, 14, 15, 17, 18, 21, 22, 31, 34)	As outlined in the draft Greening Strategy, there is no proposed net increase in funding for greening initiatives, and the initiatives will need to be accommodated within the existing budgets. Funding through the Environmental Rate, biodiversity offsets and grants could support these initiatives. Following the adoption of the draft Greening Strategy, Council will need to determine if and what funds could be redirected to funding the actions and projects outlined in the strategy. Recommendation: no change
Review timeframes	The Greening Strategy should be reviewed sooner than five years, when we are facing such potential ecological threats. A lot can be lost or gained within half a decade when we are in such a changing world. Committing to frequent reviews or monitoring could show that Council is committed to the environment and the environment is a priority. It may be beneficial to have annual reviews and progress reports. This could include a follow up summary outlining the actions to be undertaken, timelines, performance indicators, funding etc. (Submissions 13, 14, 15, 17, 18, 22)	Being the first version of the Strategy, it is proposed that a review will be undertaken within five years. It is acknowledged that there is challenges in the MidCoast including pressure of new development and the threat of climate change. To ensure that the draft Greening Strategy is implemented, a number of priority actions have been included to ensure that there are quick wins. It is important to have quick wins in this Strategy that can be delivered based on what we know now, as well as continuing to build a strong foundation to inform long term change. The proposed review within five years provides an opportunity to update the principles based on the data collected from projects like the Tree Canopy Mapping and Heat Analysis. With increased data and learnings from trial projects and investigations, we will have evidence to plan greening initiatives for future years. If there is an identified critical need for an earlier review, the proposed five year review could be undertaken earlier. Implementation progress could be monitored by keeping track of the progress of the completed short term actions (2021-2024). Progress updates could be provided to the community through existing newsletters like Creek to Coast, or even flyers with rate notices providing an update along with an update on other environmental projects and initiatives. It is envisaged that future versions of the Strategy will build our first Greening Strategy, with a shift to more on the ground projects that are led by the data and knowledge collected. There is also opportunity to track progress on greening initiatives through the
		reporting against Council's carbon emissions reduction target. Recommendation: no change
The draft Greening Strategy needs to result in action	The draft Strategy needs to outline actions like plans for street trees and indicate where trees can be planted on Council managed land. It needs to not promise action, but actually follow through with this. (Submission 21, 22)	To ensure that the draft Greening Strategy is implemented, a number of priority actions have been included to ensure that there are quick wins. Public land offers some immediate opportunities to make improvements and Council wants to think differently. Road verges could transform to street gardens, canopy trees could shade playgrounds and carparks rather than shade structures and open drains (both concrete and grassed) could become vegetated drainage corridors. Priority actions could also be incorporated into the Delivery Program and Operational Plan to ensure implementation.
		The draft Strategy outlines the Shade Tree Program which is a short term action. The program aims to actively increase natural shade throughout the open space network, along walking and cycling trails. Throughout the Strategy, many of these projects are already underway. The draft Strategy also outlines to other short term projects that provide a basis for more projects and initiatives. They are the review and updating of the tree species schedules across MidCoast, guidelines for planting trees and clearly outlining the process for community groups to organise a community tree planting event. Together we all need to retain and plant trees today, to create a positive legacy for future generations.

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Compliance and enforcement of environmental controls and policy	 There is a need for compliance and enforcement of environmental controls and policy. Concerns included: the current damage occurring to the shorelines of our waterways, having enough resources and staff to enforce even the current issues, enforcement of the draft Vegetation Management Policy self-assessment process, without funding for compliance officers, the draft Vegetation Management Policy is simply a toothless tiger and not likely to dissuade persistent environmental offenders and allow them to continue their practices. (Submissions 13, 22, 31) 	The draft MidCoast Greening Strategy sets out a forward-thinking plan of action for greening that targets specific locations according to what is needed. One of the priority actions proposed in the draft MidCoast Greening Strategy is the introduction of a Vegetation Management Policy in targeted areas, aimed at maintaining the ecological values or landscape character and amenity these areas contribute through existing vegetation. The draft Policy outlines the controls that will apply and what the parameters are for vegetation removal. The draft Policy aims to put in place a process for vegetation removal in areas identified by the Policy mapping. Clearing as described by <i>State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017</i> (the SEPP) can be considered as 'development' for the purposes of the <i>Environmental Planning and Assessment Act 1979</i> . Before removing or pruning can be lawfully carried out, a Council issued permit approval must be obtained. The NSW Department of Planning, Industry and Environment considers that a breach of the SEPP constitutes an offence against section 4.3(a) of the <i>Environmental Planning and Assessment Act 1979</i> . This can be enforced through the existing penalty notice regime, prosecution in the Local Court or prosecution in the Land and Environment Court. Failure to comply with the conditions of a permit is also considered a breach of <i>State Environmental Planning Assessment Act 1979</i> . It is proposed that Council will continue to deal with compliance and enforcement using the existing resources. Recommendation: no change
Fines for developments that contravene policy and legislation	The community needs to be confident that developers and Council will protect the environment. The community also needs to able to have confidence in decision making process and have a clear understand what will be protected. There should be fines and penalties for developers who contravene environmental policy and legislation. The fines and penalties need to be more than just a deterrent that developers can factor into their profit margins. For example a 'two strikes and you're out' policy should be in place, where when an individual or developer who contravenes environmental policy and legislation on more than one occasion, loses their 'licence to develop'. (Submissions 13, 14, 15, 22)	No single project or program can enable us to manage and enhance all of our landscape. Rather it is a complex web of legislation, programs, controls and strategies that interlink to enable this to happen, and this in itself is a challenge. Knowing who to contact and what controls apply over private property can be confusing. It is also a challenge to know who to contact to report illegal clearing. If you are unsure, please contact Council who will be able to help identify the organisation or government body responsible for non-compliance or enforcement. Developers need to comply with the conditions of their development consent which can be enforced under the <i>Environmental Planning and Assessment Act 1979</i> . Developments in environmentally sensitive areas often have restrictions registered on the title of the land to protect significant native vegetation in the long-term. Other organisations and government bodies contribute to the management/protection of the MidCoast landscape for example the local Landcare groups, Crown Lands, NSW Rural Fire Service, Forestry Corporation of NSW, Hunter Local Land Services and National Parks and Wildlife Service. Often Council is not the organisation responsible for large scale clearing. Under <i>State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017</i> , clearing of native vegetation above the Biodiversity Offset Scheme threshold is not regulated by councils. Clearing above the threshold requires an approval from the NSW Native Vegetation scan also result in clearing of vegetation over the Biodiversity Offset Scheme threshold and this is regulated by councils under a Tree Preservation Order need to seek a biodiversity conservation licence from the NSW Department of Planning, Industry and Environment. All of this demonstrates that our landscape is made up of a complex web of legislation, programs, controls and strategies that interlink. A key principle of the draft Greening Strategy is to build partnerships, and one key aspect of this is education to raise awarenee
Education about the proposed Vegetation Management Policy	The low number of applications for tree removal is not a reason for removing the Tree Preservation Order. The low number of applications made for tree removal each year may be because people are either unaware that there is a Tree Preservation Order, or they know about the Tree Preservation Order, but they remove trees illegally i.e. without applying for a permit. A great deal of tree removal goes on without permits. What is needed is education about the value of trees as habitat and to protect scenic amenity for the community, and	It is acknowledged that a key component of having any Vegetation Management Policy in place, is to make landowners aware of the Policy and educate landowners of the importance of vegetation and the benefits they can provide. A key component of the draft Greening Strategy that complements the draft Vegetation Management Policy is building partnerships with landowners. Unfortunately, illegal vegetation removal occurs in the MidCoast, and Council plays a role in investigating tree and vegetation removal within its jurisdiction.

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	education about the existence of the tree preservation order combined with enforcement of the existing tree protection orders. If Council is genuine about keeping what we have, it would be valuable to have a webpage for vegetation protection on the MidCoast Council website. This could provide a simple overview of the laws (state and local) in relation to vegetation protection. (Submission 6)	Recommendation: Expand action 2.2: Implement vegetation management controls and provide contact details for government agencies who administer vegetation controls. This will be a short term action.
Tree preservation	Tree removal needs to be controlled for trees that are 10m or higher, to monitor and manage any habitat and biodiversity loss. (Submission 1)	An action of the draft Greening Strategy is to develop and consult on vegetation management controls that adopt a targeted approach. The draft Vegetation Management Policy was on exhibition at the same time as the draft Greening Strategy. The Policy outlines the controls that will apply, what the parameters are for vegetation removal and put in place a process for vegetation removal in areas identified by the Policy. Recommendation: no change
Coverage of the proposed Vegetation Management Policy: extended coverage based on data	The value of vegetation is now better understood and in need of protection. In the draft Vegetation Management Policy, specific areas have been targeted based upon land use potential. It should become apparent from investigations such as the proposed Tree Canopy Mapping that there are other areas of trees and vegetation that will also need protection. (Submission 26)	If other areas are identified that are suitable for inclusion following the completion of actions like the proposed Tree Canopy Mapping, they could be considered by Council if they are warranted, justified and not protected by other legislation. The benefit of collecting data like Tree Canopy Mapping is that it can help make informed and targeted decisions. Recommendation: no change
Coverage of the proposed Vegetation Management Policy: urban areas	Support the widening of the protection of urban vegetation across the entire MidCoast Local Government Area using the steps outlined in the draft Vegetation Management Policy, provided that all urban areas are subject to the Policy. (Submissions 25, 32)	If land is currently in a rural zone, it cannot be considered for inclusion in the draft Vegetation Management Policy. The <i>Local Land Services Act 2013</i> regulates the management and clearing of native vegetation on rural zoned land in NSW, and this is administered in the MidCoast by Hunter Local Land Services. This is the approach applied across the MidCoast. In addition, some environmental zoned land is identified as 'Coastal Wetland' or 'Littoral Rainforest' in <i>State Environmental Planning Policy (Coastal Management) 2018</i> . It cannot be cleared without development consent and are mapped on the
		Biodiversity Values Map triggering entry into the Biodiversity Offsets Scheme. Therefore, there is no need to include these areas in the draft Policy as they are covered by other legislation. It is envisaged that the draft Policy is flexible enough to include additional areas if they are warranted, justified and not protected by other legislation. Recommendation: no change
Coverage of the proposed Vegetation Management Policy: foreshores	In addition to the locations listed in the draft Greening Strategy, the Vegetation Management Policy is needed around all foreshores including the coast, lakes and rivers to protect the range of values that trees provide in these locations. This is because people keep removing trees for view improvement. Tree removal from foreshores is a bad outcome for native animals, a bad outcome for the environmental health of waterways and a bad outcome for the naturalness of our waterways. Landholders have a responsibility to manage land for much more than views. (Submission 6)	No single project or program can enable us to manage and enhance all of our landscape, including our foreshores. Rather it is a complex web of legislation, programs, controls and strategies that interlink to enable this to happen, and this in itself is a challenge. If the foreshore land is currently in a rural zone, it cannot be considered for inclusion in the draft Vegetation Management Policy. The <i>Local Land Services Act 2013</i> regulates the management and clearing of native vegetation on rural zoned land in NSW, and this is administered in the MidCoast by Hunter Local Land Services. This is the approach applied across the MidCoast. The draft Vegetation Management Policy has particularly identified additional land around the Myall Lakes. Often
		environmental zoned land along our foreshores are identified as 'Coastal Wetland' or 'Littoral Rainforest' in <i>State</i> <i>Environmental Planning Policy (Coastal Management) 2018.</i> It cannot be cleared without development consent and are mapped on the Biodiversity Values Map triggering entry into the Biodiversity Offsets Scheme. Therefore, there is no need to include these areas in the draft Policy as they are covered by other legislation. Another consideration is the extent of public foreshore land. Public foreshore land has its own processes depending on
		ownership i.e. Crown Land or Council owned land. Marine vegetation such as mangroves are also protected under the <i>Fisheries Management Act 1994</i> which requires a permit for their removal. It is envisaged that the draft Policy is flexible enough to include additional areas if they are warranted, justified and not protected by other legislation. Recommendation: no change
Replacement planting under the proposed Vegetation Management Policy	The vegetation management controls outlined in Principle 2 mention that under the proposed process will consider offset arrangements to ensure new trees are planted to	When tree replacement occurs the community needs to be educated on the importance of maintaining the planting and retaining the replacement tree. Monitoring is needed to stop the removal or killing of the replacement tree.

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	replace trees that removed. Tree replacement can be ineffective if it is removed by residents when they feel it is safe to do so without reprisal. (Submissions 5, 22, 29)	Recommendation: Investigate opportunities in the draft Vegetation Management Policy for replacement planting and monitoring.
Resourcing the proposed Vegetation Management Policy permit process	By switching the focus from urban to semi-urban for tree controls and approvals, will there be adequate staff resources? The draft Greening Strategy highlights that there is currently around 120-130 applications a year. Are a lot of the potential Tree Preservation Order applications dealt with prior to the application stage, so that generally those applications that are submitted are the ones likely to be approved? (Submission 24)	It is proposed that Council will continue to process permits for tree(s) or vegetation pruning or removal using the existing resources. Currently under the Tree Preservation Order, there is no need to get a permit approval if you are exempt. There is no form to complete if you are eligible for an exemption, and there is no formal process for recording the exempt applications under the current Tree Preservation Order. The draft Vegetation Management Policy requires the self-assessments to be logged in Council's systems as evidence the exemption for the removal of the vegetation or tree(s) identified during the self-assessment. This will allow Council to monitor the amount of self-assessment exemptions on an annual basis. Ultimately the Policy seeks to provide a transparent and streamlined process. This is considered an improved process and in line with the community's expectations, that tree and vegetation removal will be monitored and where required enforced by Council within its jurisdiction. Recommendation: In accordance with the recommendations for the draft Vegetation Management Policy, include additional text in the draft Vegetation Management Policy under the Policy content section outlining the lodgement of the self-assessments will also enable Council to monitor the completed self-assessments and undertake compliance and enforcement
Current Tree Preservation Order	Need investigate the intentions of the decision makers that are proposing to remove the current Tree Preservation Orders in the Great Lakes. The timing of the removal of previous green conservation orders in the Great Lakes seems suspiciously intended to allow unfettered access to developers to clear areas that may have been subject to protection prior to the forced amalgamation. There has been no thought to existing community and to suggest that we should now 'keep what we have' and 'cool our towns' is a mockery considering the clearing that has occurred and the massive concrete tracts that are being planned or approved by Council. (Submission 33)	if required. Using a highly targeted approach, areas have been mapped across the MidCoast based on their contribution to significant ecological values - e.g. koala habitats, or their contribution to landscape character and amenity. These identified areas have been identified for inclusion in the draft Vegetation Management Policy. The draft Policy is a pivotal tool to protect significant vegetation across the MidCoast and it aims to maintain the vegetation that we already have in place. In the Great Lakes region it is proposed to include urban areas such as Hawks Nest, Pacific Palms and Smiths Lake which provide habitat for species such as koalas and squirrel gliders. Villages like North Arm Cove, Bundabah and Pindimar where the 'leafy' character contributes to amenity and property values are also included, along with larger environmental sites around Coomba Park, Charlotte Bay, and Boolambayte, and Large Lot Residential estates like Failford and Tea Gardens. The draft policy does not apply to larger towns like Forster, Tuncurry and Bulahdelah, where the focus will be on working with the community to green their neighbourhoods. The assessment of a Development Application is a separate process to the draft Vegetation Management Policy. There is no change in the assessment of the Development Application (including subdivision applications), Council will assess the application on its merit and also assess any proposed vegetation removal and environmental considerations. As a result of this, the importance of identifying significant vegetation and habitat corridors through the strategic planning process needs to be stressed and highlighted. The strategic planning processes guide the location and design of future development and this is outlined in Principle 5. Recommendation: no change Recommendation: no change
Projection of squirrel glider habitat	The draft Strategy mentions the squirrel gliders in Forster and considerable research done on this species to date. Is the draft Vegetation Management Policy putting this population under threat? Linking urban greening with a key species such should be key to getting community support. There should be an action in the draft Greening Strategy relating to the squirrel glider, and the squirrel glider population could be a good metric to the success or failure of this Strategy going forward. (Submission 24)	The draft Biodiversity Framework outlines that certain threatened species including the squirrel glider have been identified by MidCoast Council for conservation action at specific locations. These species have been prioritised based on community concern, the presence of habitat on Council land, the damaging effects of the 2019 bushfires and/or the species being a flagship species whose conservation benefits other species or landscapes. Within Council's reserves, there is significant conservation assets such as the fragmented urban Forster squirrel glider populations, that are highly vulnerable to the impacts of uncontrolled fire. In October 2019, the Forster squirrel glider population received a helping hand with the local community participating in a tree planting day. Around 70 native trees, shrubs and grasses were planted, providing future feeding and nesting habitats for a wide range of native animals, particularly the loved and vulnerable squirrel glider. Council has received funding assistance from the NSW Government through its Environmental Trust. These funds are being utilised to enhance the habitat of the squirrel glider population across 53-hectares of Council Reserves in Forster. This includes bushland restoration works, such as weed removal, pest animal controls, food tree plantings, rubbish removal, as well as the delivery of community education programs. It also involved the installation of specially-constructed nesting boxes in areas of the reserves where natural hollows are in short supply.

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		In line with the draft Biodiversity Framework and draft Greening Strategy, Council will continue to implement projects to protect and enhance the squirrel glider habitat. This will include continuing to educate landowners to assist the squirrel gliders by keeping cats inside, retaining native vegetation in gardens, planting squirrel glider food or even building a habitat box for their backyard.
		Recommendation: no change
Significant Tree Register	Council should consult with the communities around the MidCoast Local Government Area to establish a Significant Trees and Vegetation Register for the purpose of highlighting and documenting the historical and environmental value of trees and vegetation. (Submissions 22, 26)	A significant tree register is not proposed, rather a targeted Vegetation Management Policy approach has been pursued. The three Local Environment Plans covering the MidCoast already identify trees with cultural and heritage values. Recommendation: no change
Fireplaces	Fireplace use in residential areas should be banned just like backyard burning. Firepits should also be controlled and restricted. Smoke is toxic and voids all greening efforts. Pollution from vehicles must also be considered. Where there is a higher concentration of vehicles, there	New solid fuel heaters are generally required to comply with the <i>Protection of the Environment Operations (Clean Air)</i> <i>Regulation 2010.</i> This controls the installation of new solid fuel heaters and ensures that heater emissions remain at an acceptable level and the heater is efficient.
	must be more street trees. (Submission 1)	It is acknowledged that during winter, the smoke from domestic solid fuel heaters causes a lot of air pollution. Wood smoke pollution affects everyone, and it is bad for your health and the health of others in your community. Council has the power to issue smoke abatement notices and on-the-spot fines of \$200 to occupiers that allow excessive smoke to be emitted from chimneys in residential homes. Where a householder has been given information on correct solid fuel heater operation but makes little or no effort to prevent excessive emissions of wood smoke, authorised officers of Council may consider issuing a smoke abatement notice. A smoke abatement notice directs a householder to make necessary improvements, maintenance or repairs to ensure that excessive smoke is not emitted from their chimneys.
		The draft Greening Strategy is proposing greening initiatives in high priority locations like urban areas. This is likely to correlate with the areas where there is a high concentration of vehicles.
		Recommendation: no change
Changing climate and emissions	Controlling poor human behaviour is needed to ensure greening is effective, and the population needs to be re-educated. There are too many old views still pushing their way, and what was ok 100 years ago isn't necessarily ok now. Residential area fireplaces are the perfect example, and chemical emissions from business is another (providing jobs doesn't mean there is a need to release toxins). Even trees cannot stop many of those toxins, so we need to reverse the mindset and move forward. (Submission 1)	It is acknowledged that trees and vegetation not only improve the character and 'feel' of our urban centres, they provide recreational spaces and shade, improve air quality and local biodiversity, and play an important part in offsetting environmental pressures caused through climate change. Urban vegetation can assist stormwater infiltration, reduce the impact of the Urban Heat Island Effect by cooling urban areas, and absorb air pollution. A key principle of the draft Greening Strategy is to build partnerships, and one key aspect of this is education. One supporting project for this principle is the continued publication of newsletters like Creek to Coast, and this could educate on the air quality benefits from trees.
		The preparation of a Climate Change Policy and Strategy is identified as a short term action in the draft Greening Strategy. The preparation of the draft Greening Strategy is identified as a short term action in the Climate Change Policy and Strategy. This shows the documents are connected and work together to improve the liveability of the MidCoast.
		The Climate Change Policy and Strategy provides a framework and a set of guiding principles for climate action, setting ambitious targets for climate mitigation, committing to reducing the risks of climate change to Council's assets and operations and supporting the community's efforts to do the same. The Strategy outlines an approach to renewable energy, energy efficiency and climate adaptation and sets out the case for a range of cost-effective actions that that can be implemented progressively over several years to mitigate and adapt to climate change in Council's operations.
		The Climate Change Policy and Strategy is the first phase of a two-part program of work and is focused on Council's assets and operations. The second phase of the project will focus on working with the MidCoast community to help them to reduce their emissions and increase their resilience to climate change.
		Recommendation: no change
Climate Change Policy and Strategy	Is there money in the budget this year to progress the Climate Action Policy? Or do we all wait another year before action is taken on this most important issue. (Submission 3)	The preparation of a Climate Change Policy and Strategy is identified as a short term action in the draft Greening Strategy. The Policy provides a framework and a set of guiding principles for climate action, setting ambitious targets for climate mitigation, committing to reducing the risks of climate change to Council's assets and operations and supporting the community's efforts to do the same. The Strategy is the first phase of a two-part program of work and is focused on Council's assets and operations. The second phase of the project will focus on working with the MidCoast community to help them to reduce their

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		emissions and increase their resilience to climate change. The Climate Change Policy and Strategy was adopted on 30 June 2021. Council will now need to determine if and what funds could be redirected to funding the actions and projects outlined in the Climate Change Policy and Strategy
		Many of the Climate Change Policy and Strategy actions can be progressed internally using existing staff and resources. Existing budgets also available to upgrade buildings to increase energy efficiency e.g. Delivery Program and Operational Plan actions for Water Services to install solar panels on five assets. Council is investigating setting up a Revolving Energy Fund to sustainably finance energy efficiency measures that generate cost savings that can be reinvested into other projects.
		Recommendation: no change
Fruit trees and indigenous eatable plants in public places	Consider fruit trees and indigenous edible plants in public places. This can allow free food for those struggling, feed some people or even allow for a food trail enterprise cooking up a local storm with all our seafood. (Submissions 1, 28)	An action of the draft Greening Strategy is the development of guidelines for planting trees and tree species schedules. This could include suitable fruit trees and edible plants for planting in public places. Recommendation: no change
More street trees are needed	MidCoast streets should have street trees (ornamental or native) and a wide range of native trees, shrubs, ground covers. There should be at least one to three trees per house block frontage. There are so many wide grassed nature strips with no trees along the streets, for example in Red Head. There are many additional native plants occurring locally, that can be attractive in gardens that can appeal to residents. The street planting also benefits the native fauna. (Submissions 2, 35)	An action of the draft Greening Strategy is the development of planning controls for the MidCoast and incorporating them into the MidCoast Local Environmental Plan and Development Control Plan. The controls could include guidance on street planting and outline the number of trees that new developments should provide. Another action of the draft Greening Strategy is the development of guidelines for planting trees and tree species schedules. This could include suitable local native plants and even suitable groundcovers. Recommendation: no change
Draft Greening Strategy education: suggestions for education programs	 Programs to increase awareness across the MidCoast Region should be a strong focus. Council needs to educate residents that plants are not threatening, dangerous or in anyway harmful. Many people are afraid of trees and they can find trees messy etc. Council needs to find ways overcome these types of paranoia and views, and suggestions to overcome this include: finding ways to make street trees more positive and favourable e.g. invite Costa from Gardening Australia to Taree and Forster to promote trees in streets and gardens, increase awareness of wildlife friendly gardening, annual awards with accompanying publicity to recognise gardens that provide strong ecological values, advice for home gardeners including plant lists and how to care for plants, advice on greening of nature strips and even planting themes/schemes, education and emphasis of psychosocial and ecological benefits, support, advice and education for rural landowners to help them do their bit, aditional resources to provide a education and resource hub relevant to different parts of the region. This would be helpful for new people moving into the area, a list of trees that provide a food source for koalas, consider creating a free residential consult for native garden planting, education programs to help the community identify what flora and fauna is valuable and unique, for example how mangroves provide valuable nurseries for aquatic life, send tree vouchers and information out with rates notices so people hear about programs, and this will create interest and support. 	A key principle of the draft Greening Strategy is to build partnerships, and one key aspect of this is education. One supporting project for this principle is the continued publication of newsletters like Creek to Coast. Council will continue to explore and identify opportunities to educate the community on the benefits of greening and increasing vegetation coverage. An action of the draft Greening Strategy is the development of guidelines for planting trees and tree species schedules. Another action is providing information on Council's website outlining the process and resources available to assist with community tree planting events. Council is willing to discuss potential partnerships for greening with landowners. Our environmental staff are also more than willing to talk with landowners about weed management and how to plant suitable native species. Throughout the draft Greening Strategy consultation, we have been able to help a number of landowners to start establishing corridors on their land and improve biodiversity. There are lot of existing programs that Council has in place. This includes the Land for Wildlife program and Backyard Bushcare. Some other education areas that Council is involved in are educating landowners on the benefits of trees, land and resource management and weed management. The community is encouraged to sign up to Council newsletters like the News Wrap which provides a snapshot of Council's weekly news. Recommendation: no change
Draft Greening Strategy education: rural landholder education	Council could task a small permanent team to run education sessions for rural landholders to teach them of the benefits of enhanced vegetation to the health of their properties as well as the biodiversity of the region. This team could actively approach interested landowners to enter into Voluntary Conservation Agreements and Property Vegetation Plans to retain	Council currently has staff that work with landowners, and interested landowners are encouraged to contact Council to see what assistance and guidance can be provided. Some of the projects that staff are involved in are: - educating landowners on the benefits of trees, - land and resource management,

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	vegetation in perpetuity, to create or join wildlife corridors or to use their land for biodiversity offsets. (Submissions 25, 26, 32)	 fencing cattle from drainage lines and creating corridors, weed management, guidance on protecting and planting native vegetation (trees and understorey), facilitating the Land for Wildlife program. Work is also undertaken by Hunter Local Land Services and the Biodiversity Conservation Trust to facilitate private land conservation outcomes. Council regularly collaborates and partners with Hunter Local Land Services to provide programs for the community. The community is encouraged to sign up to Council newsletters like the News Wrap which provides a snapshot of Council's weekly news. Recommendation: no change
Draft Greening Strategy education: Green Web program	Form up a 'Green Web' program (perhaps call it Creek to Coast) for residents to refer to regarding their backyard plantings to link in with wildlife corridors. The participants may receive five plants per year. Registered program participants can volunteer at Council nurseries (similar to the Sutherland Shire Council Green Web Program). (Submission 5)	Council will investigate and develop programs to increase community participation and education like this Green Web program suggestion. Council will also continue to explore and identify opportunities to educate the community on the benefits and value of greening and increasing vegetation coverage. Recommendation: no change
Nursery capacity	It would be good if Council clearly stated a program that rate payers could link into, like including vouchers with rate notices for free local tube stock plants (annually). There is also scope for the Council to be working with local nurseries to be selling such plants collected from local seed, so that such nurseries are not adversely impacted by Council plant give-aways. (Submissions 1, 5, 22, 35)	One supporting project of Principle 1 and 4 is increasing the capacity of Council's two nurseries to propagate local native plants for Council and community groups for landscaping and bushland regeneration projects on public land. Plants are also sold to landholders for environmental restoration projects on private land. The nursery capacity needs to be increased to first be able to cope for the demand from Council projects. The next stage would be to increase the capacity for being able to provide rate payers free local tube stock. If Council cannot supply adequate stock using the existing nurseries, Council could investigate partnerships with local nurseries to provide tube stock. Council will continue to explore and identify opportunities to engage and educate the community on the benefits and value of greening and increasing vegetation coverage. Recommendation: no change
Conservation partnerships on private land	Support for the action to investigate and develop a program that conserves significant bushland in perpetuity. This should be in addition to partnerships and agreements with private landholders to manage private land for conservation. (Submission 6)	The work undertaken by the Biodiversity Conservation Trust is the primary driver for private land conservation. Council can identify significant conservation areas through the strategic planning process and through dedication to Council as part of the development process. There are priority bushland parcels across the MidCoast in private ownership which contribute significantly to the natural landscape. Typically adjoining publicly owned land and containing important ecological assets, their contribution to the natural landscape can be significant. Council has a role in identifying lands of high conservation value under threat that should be protected, seeking funding sources and facilitating this process. By adopting procedures and dedicating funds to secure identified high priority bushland parcels, Council will be able to facilitate purchases when opportunities arise and ensure that environmentally significant bushland is protected in perpetuity. The proposed program that conserves significant bushland in perpetuity could identify ways for the conserved bushland to happen in conjunction with other programs like Land for Wildlife program. The Land for Wildlife is a voluntary program that encourages landholders to manage biodiversity and wildlife habitat on their properties, focusing on the value of bushland in maintaining healthy catchments and supporting agriculture. Recommendation: no change
Conservation on private land	Encouraging conservation on private land is an excellent idea, and perhaps a presentation in local halls might bring in a few more. Some Elands residents are following through with this by using NSW Conservation Trust, though some residents are refused by the Trust because their land area is too small. It is disappointing that many private landholders still believe that full clearing is advisable when farming cattle, and landowners need to be educated about the	Council along with Government Agencies like Hunter Local Land Services can play an integral role in encouraging and facilitating conservation on private land. A key component of the draft Greening Strategy is to continue educating the community on the benefits of greening and increasing vegetation coverage. This could include education programs with Hunter Local Land Services to educate farmers on the benefits of vegetation cover for livestock.

Summary topic:	Summary of submissions and response:	Response and recommendation
	benefits that trees can provide to livestock. Incentivise programs for plantings on private lands could be considered. (Submission 3, 22)	Landowners can also write to Council requesting their land to be considered for inclusion in a suitable environmental zone if the land has significant environmental values or should be conserved. This potentially could be incorporated into the zone changes proposed in the draft Rural Strategy when it is released, and then reflected in the draft MidCoast Local Environmental Plan. Conservation Agreements are available option for smaller sites. A Conservation Agreement is an agreement between landholders and the Minister for the Environment. The Agreement provides permanent protection for the special features of
		the land. Entering into an agreement is voluntary, and the land can be privately owned. Recommendation: no change
Partnerships	Building partnerships is important. Myall Koala and Environment Group are a local group that could benefit from Council assistance, for example in their tree planting endeavours. Gloucester Environment Group are also interested in building partnerships between Council, other community groups, and residents. (Submissions 26, 29)	A key principle of the draft Greening Strategy is to build partnerships. Council will continue to explore and identify opportunities to partner with the community and community groups to realise the benefits of greening and increasing vegetation coverage. Community groups are encouraged to contact Council to see what assistance and guidance can be provided. Recommendation: no change
Expand Landcare coverage	Council should be encouraging Landcare to operate across the whole MidCoast LGA. (Submission 26)	Council will continue to explore and identify opportunities to partner with the community and community groups to realise the benefits of greening and increasing vegetation coverage. Council is willing to put landowners and community groups in contact with local Landcare Coordinators to investigate opportunities for expanding the invaluable work they do for the environment. Interested residents are also encouraged to visit the Mid Coast 2 Tops Landcare Connection website for further information. Recommendation: no change
Backyard Bushcare	The Backyard Bushcare approach should be adopted much more widely, including on rural residential land. (Submission 6)	Support for the Backyard Bushcare program and the suggestion that it should be rolled out to more areas is noted. The aim of programs like Backyard Bushcare is to educate landowners and provide them with the knowledge as to how best manage their land. Recommendation: no change
Draft Greening Strategy: tree species schedule and guideline	 Feedback on the proposed list of tree species schedule and guideline included: tree species should be local native species, and whenever they are not native species one of the considerations for suitability is whether they have the potential to become weeds, use of native species will help to restore the natural character of our landscapes, it will enrich the habitat values of our urban areas and will minimise the risk of creating weed problems, local Indigenous people should also be involved in developing the list of preferred street trees. This will provide an opportunity to enrich urban areas with culturally significant plants, Gloucester Environment Group has members with professional and academic backgrounds, as well as practical experience who could provide feedback on Council's proposed plant lists and guidelines, the 'tree species schedule and guidelines' will be a useful document, and the community needs to be notified when it is developed, it would be desirable to develop a list of native species that are suitable for privacy screens, and that are of low fire risk, low water use etc. 	The proposed review and update of tree species schedules across the MidCoast is likely to be predominately made up of native species. The use of native species not only achieves the greening outcomes, but it can provide valuable habitat for native fauna. As outlined in the draft Greening Strategy, a list of trees with cultural values and 'bush tucker' trees will be explored in partnership with our local indigenous communities. The list could also identify trees that complement one another and could be planted together. Council staff will take the lead on the development of the list by making use of the knowledge and experience of staff. Recommendation: no change
Draft Greening Strategy: planting schemes and themes	I disagree with the statement about the Jacarandas enriching the Martin Bridge approach in Taree, as it is an exotic species that is becoming a weed. Straight avenues of single species	The draft Strategy identifies the Cabbage Tree Palms at Pacific Palms, Figtrees near the Old Dairy Cooperative in Chatham and the Jacarandas on the approach to the Martin Bridge in Taree as examples only. They are examples of how planting can enrich these locations by the dominance of a single tree species or theme planting.

Summary topic:	Summary of submissions and response:	Response and recommendation
	are not enriching, and to me they are the opposite of enriching, they are deadening. There is a need mixed species planting. (Submission 6)	Future planting schemes like these will draw from the information contained in the tree species schedule and guidelines and may include mixed species plantings.
		Recommendation: no change
Council staff education	Concern that the staff at MidCoast Council and consultants employed by Council, should be shown and if possible, trained on this document. They need to be educated that even degraded land has value and it can be restored. (Submission 3)	Council is committed to leading by example and where appropriate staff will be given training. It is important that staff continue to work with the community to identify land that needs to be protected and restored. Recommendation: no change
Offsets: Council	 Feedback provided on biodiversity offsets for Council projects included: residents can get upset when they see trees they know and have an attachment to being removed for roads, whenever possible replacement trees should be put back in place from where they once were, there needs to be good communication from Council about proposed offset planting and the location of the offsets, Council needs to commit itself to compensatory planting and actually implement promised compensatory planting, the process of selecting the right place for offsets is not transparent to the community. (Submissions 3, 21, 25, 30, 32) 	In instances where Council needs to remove vegetation for the provision of public infrastructure, the replanting of vegetation occurs in accordance with Council's existing biodiversity offsets procedure. Wherever possible the replacement vegetation is planted as close as possible to the site where the vegetation could be improved. It is acknowledged that vegetation removal can be a very emotional issue to our residents, and communication could be improved to provide more information on the process and where the replacement trees could be planted. Council has an existing procedure for biodiversity offsets and determine where funds are being collected to plant trees to replace the lost vegetation. One challenge is determining where the plantings should occur. To address this issue the draft Greening Strategy notes that biodiversity offset sites should be identified to help achieve the best environmental outcomes possible. Future reviews of Council's own biodiversity offsets procedure, and if there is a suitable method for recording offset planting. The draft Greening Strategy recommends undertaking investigations into biodiversity offset sites to determine whether the outcomes are beneficial. It is noted that offsets need to be in a suitable location and contribute to the ecological richness of the MidCoast landscape. It is also acknowledged how important transparency is, and that the offset procedure should let the community know where the offset planting is located. Recommendation: no change
Biodiversity offsets for development: general feedback	 Feedback provided on biodiversity offsets for development included: the location of the offsets for development and that they should be local offsets, there is an issue with offsets not being truly like for like offsets, lost bushland with all its complexity, can't be simply replaced by tree planting, offsets need to be transparent, followed through and documented, there needs to be good communication from Council about proposed development offset planting, offsetting and remediation are inadequate means for addressing damage, be clear how the habitat removed will be restored into the future, even if well-intentioned at the outset, there is little commitment either financially or practically to follow-up the offset plan to ensure success, funding is required to ensure compliance but retaining local biodiversity should remain a priority, improve development assessment processes in relation to protection and management of urban trees and vegetation, development must not be given priority over conservation. (Submissions 13, 21, 22, 25, 30, 31, 32) 	Biodiversity offsetting is based on the theory that biodiversity values gained at an offset site will compensate for biodiversity values lost to development at another location to achieve a standard of 'no net loss' of biodiversity. An offset site is a location where native vegetation condition and threatened species habitat are protected in perpetuity and can be improved by management actions such as fencing, weed control, pest control and planting native species. The primary purpose of offsetting is to facilitate development in an environmentally sustainable manner, and to ensure development does not have unacceptable impacts on native ecosystems and species. Offsetting also provides an incentive to protect biodiversity on private land, provides an income for landholders with offset sites and achieves biodiversity conservation outcomes into the future. Development applications can be for the subdivision of land, establishing a use on land or creating the opportunity for the construction of a building. When a development application is received it can trigger a number of legislative requirements, the primary legislation being the <i>Environmental Planning and Assessment Act 1979</i> . Council is required to consider the potential impacts of the development on the environment any threatened species or ecological communities known or likely to be present and apply mitigation measures through conditions of consent. The <i>Biodiversity Conservation Act 2016</i> , together with the <i>Biodiversity Conservation 2017</i> , outlines the framework for addressing impacts on biodiversity from development or vegetation clearing. The obligation must be retired to offset their activity. Depending on the offsetting arrangement or program, the responsibility of administering this varies. The <i>Biodiversity Conservation Act 2016</i> , together with the <i>Biodiversity Conservation Act 2017</i> , outlines the framework for addressing impacts on biodiversity from development and clearing. The obligation must be retired to offset their activity. Depending on

Summary topic:	Summary of submissions and response:	Response and recommendation
Draft Greening Strategy: biodiversity offsets wording	The Biodiversity offsets section on page 24 should be reworded to make it clearer what offsets can be used for. (Submission 5)	It is acknowledged that wording could be made clearer. Recommendation: Amend wording in first paragraph under the Biodiversity offsets heading as follows: Offsets are used to compensate for biodiversity impacts associated with development. Offsets are used when the impacts of a development are unavoidable, and they are unable to achieve no net loss of biodiversity. Prior to offsets being used, effort should be made to prevent or reduce the impacts.
Bushfires	There is a need for hazard reduction bushfire protection. It should to be done with awareness and information such as that provided by Indigenous mosaic burning cultural practices. A cause of more intense bushfires is climate change and forests. A further consideration in bushfire mitigation is the clearing of what previously had been swamps for development. Constant re-ignition of dense and deep peat layers was one of the most exhausting and continuing challenges of the 2019/2020 fires. A major source of fire ignition is faulty power infrastructure, and Council should mandate that in new developments power infrastructure be underground. There also needs to be a proper discussion of how greening or development interfaces with the bushfire risk. As the risk of bushfires increases with changing climate, it would be good to see the Strategy acknowledge the role of rainforest communities and species in their greater resilience to bushfires. (Submissions 13, 14, 22, 30, 34)	 With learnings from the 2019 bushfires and others across NSW, we will continue to work with the NSW Government to establish a more strategic approach to planning and managing bushfire risk in accordance with the NSW Government's Planning for Bush Fire Protection. It is important that the implementation of the Greening Strategy does not significantly increase bushfire risk. Council will continue to work with government bodies including NSW Rural Fire Service, Crown Lands, Forestry Corporation of NSW and National Parks and Wildlife Service to undertake hazard reduction exercises in accordance with best practice. Council is in the process of preparing Bushfire Management Plans for some of Council's larger bushland reserves. One action outlined in the draft Greening Strategy is the preparation of the MidCoast Development Control Plan. The plan could encourage where suitable the consolidation of services (water, sewer, power, telecommunications) in one underground location in new estates. This will also allow new developments to establish street trees in the road reserve. Consolidated underground services will also minimise the risk of fire ignition from power infrastructure. Recommendation: no change
MidCoast LEP and DCP	 Comments relating to the proposed MidCoast Local Environmental Plan (LEP) and MidCoast Development Control Plan (DCP) included: Support the proposed Development Control Plan changes, so that new developments do not become a sea of dark roofs like in Port Macquarie and around Newcastle, Gloucester Environment Group supports the alignment of planning controls with the Greening Strategy, Rural Strategy and Biodiversity Framework, Gloucester Environment Group is supportive of planning that recognises the value that trees (particularly native trees) and that vegetation adds to the value of real estate. They support biodiversity and visual amenity which are values residents and visitors' rate highly, minimise the spread of urban development into native bushland and natural areas, while at the same time enhancing the environmental qualities of existing developed areas, Council should have a policy to require subdivisions to retain or plant set percentages (say 20%) for greenspace, each subdivided lot should require retention or planting of at least one tree to create a better ambience and improve cooling, nothing is uglier or detrimental to urban cooling, than a sea of roofs with not a single tree on any of the housing lots, developments should that link vegetated areas together via 'corridors' to enable movement of wildlife, find ways to improve future developments to retain trees, controls need to be developed for designing the interface between new developments and native bushland. Historically they have been poorly designed and implemented, resulting in long term management issues, long term threats to ecosystem services, and the natural values of bushland, page 25 of the draft Strategy shows a typical new development, carved out of bushland which is more than likely bushfire prone and it is devoid of tree cover presenting a sterile landscape. Turn these new developments into leafy suburbs 	As outlined in the draft Greening Strategy, the MidCoast Development Control Plan (DCP) needs to be prepared to improve greening outcomes through development. One component will be enabling new controls to reduce the effect of heat islands. This could include guidance on suitable roofs that can reduce the effect of heat islands. Through the development of the DCP, we will continue to check-in with the community to ensure the document is in-line with community expectations. The DCP could provide guidance on how to best deal with urban bushland interfaces. This could include how to best deal with Asset Protection Zones to ensure that they do not encroach onto the native bushland and are accommodated within the development and. It could also provide guidance on how to minimise the long term management issues like weed encroachment and minimise the likelihood for backyard creep into bushland. Recommendation: no change

Summary topic:	Summary of submissions and response:	Response and recommendation
	 interfacing with their bushland surrounds, because lost bushland is lost bushland and it cannot be compensated, there should be building envelopes that allow space for a tree in the yard. The current owner may not want one, but you want to leave capacity for this to occur at some point, improve tree, vegetation and biodiversity protections within the MidCoast Local Environmental Plan, rooftop greening on all multi level buildings should be encouraged. 	
Location-specific strategy for	The strategy outlines the location-specific strategy for Hallidays Point. Over twenty years	An action of the draft Greening Strategy is to develop a location-specific strategy for Hallidays Point. The proposed strategy
Hallidays Point	ago, residents at Hallidays Point fought to have three separate villages with tree cover in between. The tree cover in the area seems to be reducing and now there is a lot less wildlife at Hallidays Point. (Submission 3)	will provide an early opportunity to retain important vegetation by clearly identifying areas for protection. It will also identify areas of vegetation that should be retained or enhanced and land that can be considered for future rezoning for urban purposes. The proposed strategy will also determine the desired environmental outcome and development opportunities, providing certainty to the community and developers alike. Strategies such as this will provide a long term plan for the retention of important vegetation for conservation and the identification of areas that will have minimal environmental impact for future development. Another recently completed strategy is the North Diamond Beach Public Access Strategy. This strategy provides a framework for ensuring that public access is obtained and/or retained along the coastline of the northern end of Diamond Beach. The access corridor not only provides opportunity for public access, it also can assist with the north to south movement of fauna.
		Recommendation: no change
Location-specific strategy for Old Bar	Old Bar has had significant residential development take place over the past years, currently and into the future. A location-specific strategy should be developed for Old Bar by Council in liaison with the community. A coordinated masterplan for Old Bar is well overdue as residential development, along with the growth of tourism, is putting increasing strain on not only our built and commercial resources, but also on our natural environment and outstanding beachside amenity. The village atmosphere needs to be preserved, and along with the appearance of the CBD and the natural environment around Old Bar. It should accommodate the unavoidable pressures of development. As a community we give feedback to Council on accessibility and pathways, flood mitigation, zoning changes, greening, biodiversity etc, and it needs to be pulled together in a coordinated plan. (Submission 18)	An action of the draft Greening Strategy is to develop a location-specific strategy for Hallidays Point. The proposed strategy will provide an early opportunity to retain important vegetation by clearly identifying areas for protection. Once this location-specific strategy for Hallidays Point is completed, Council will identify areas that also require a similar strategy. This could include a strategy for the Old Bar locality which builds on all the recent studies, strategies and plans. Recommendation: no change
Riverbank vegetation	After the devastating floods this year I was horrified to see that all the bush that Landcare had planted at the Petken Drive Reserve and along Flanagans Spit actually cause severe damage. The farmers who have farmed for years know how to protect the riverbanks and they say that trees should not be planted on the banks, a good grass cover only protects the banks from being gouged by the water. Almost all the trees were washed downstream to cause problems for other farmers. I am not against trees being planted but please keep the integrity of the banks solid. Plant the trees in unpopulated areas and well away from the riverbanks. I despair every time I sit on my verandah and view the damage that the Landcare trees have caused along the river here. The trees caused the flooding river to take a different direction this time and caused damage to areas that had no damage last flood in 2011 or earlier. Also land developments are causing the river to flood to different areas and people who have never been affected before are now having higher water levels and even inundation. I am all for nature, I love nature and animals – I just think that we the humans are causing all	Australian river systems have undergone extensive channel change since European settlement. Much of the native vegetation was cleared from stream banks and floodplains for intended improvements to the river associated with agricultural production, river navigation or urbanisation. Some Australian rivers have a highly degraded riparian zone as a result of extensive human interference. While bank erosion is a natural process, the removal of riparian vegetation has seen accelerated erosion rates have become a significant issue. Water is not the enemy; it is the speed of the water that causes the damage along the banks of Australian rivers. Australian riverbanks are meant to be rough and bumpy, and riparian vegetation provides protection from flood impacts. Diverse native riparian vegetation established through revegetation programs can be effective at reducing extent, velocity of flood waters and scale of flood related riverbank change. Native riparian vegetation must contain diverse structural elements including sedges, reeds, ground covers, shrubs and trees suitable to address the range of erosion mechanisms. The vegetation also needs to be given adequate time to establish and develop root systems. Vegetation can also help prevent bank erosion by binding the soil together, with some of the best examples being mangroves, fig trees and deep rooted eucalypts. Pasture grasses, with their shallow root systems, cannot fully protect the soil. This means that the soil could still fracture and fall into the river. With the consequences that overtime farmers have lost significant amounts of pasture and even fencing.

Summary topic:	Summary of submissions and response:	Response and recommendation
	this damage, perhaps we should leave nature to do its own thing and just replace what is taken.	vegetation also helps maintain good quality water in our catchments. As outlined in the draft Greening Strategy it is intended to plant the right trees in the right place and continue to partner with local community groups like Landcare.
	Our farmers have managed the riverbank for hundreds or years and seem to have been doing a better job of it, as it is their livelihood, so they have a vested interest in the river and bank being healthy. And as we are a 'river city' perhaps we should be including some of the old farmers into the processes and heed their advice. (Submission 4)	Recommendation: no change
Bike and walking tracks	The draft Strategy could identify more bike and walking tracks. Tree planting within towns should be aligned with the Council's public pathway and playgrounds programs, so that the opportunity for continuous shade for pedestrians is available. In new residential subdivisions,	The recently adopted MidCoast Towns and Villages PAMP (Pedestrian Access Mobility Plan) and Bike Plan provides a series of strategies to improve facilities for walking and cycling across the MidCoast Council region. The plan recognises the community's desire to see improved pedestrian and mobility access across the region.
	more pathways with trees should be provided. (Submissions 10, 26)	The draft Greening Strategy recognises the importance of having shade throughout the open space network. One action of the draft Strategy is the Shade Tree Program. The program is being developed to actively increase natural shade throughout the open space network, along walking and cycling trails.
		Recommendation: no change
Wingham CBD draft masterplan	The statement that the greening of towns is not reflected in the desire to replace vegetation around Central Park Wingham with a brick wall. The greening of Wingham CBD appears to be a very long term project. The current narrowing of streets in Wingham should permit the planting of trees along the verge. A better solution may have been a central planting. Wyoming Street for instance has a central panel of grass but no vegetation. This is a wonderful opportunity to plant some shrubs and trees. (Submission 11)	Council recently sought final feedback from the community on the Wingham CBD draft masterplan, before proceeding to detailed design work and scheduling of the works. The consultation findings are currently being reviewed to incorporate feedback into the plan. The Wingham CBD draft masterplan is a separate project to the draft Greening Strategy, though it is envisaged that wherever possible the masterplan will be consistent with the greening aims outlined in the draft Greening Strategy. Recommendation: no change
Programs across the MidCoast	The Tinonee (koala), Forster (squirrel glider) and Pacific Palms initiatives are great. They should be implemented more broadly and immediately across all of the MidCoast area. (Submissions 13, 14)	The size of the MidCoast is a challenge in itself, and therefore we cannot roll out every program across the whole of the MidCoast. Some initiatives like the Backyard Bushcare program implemented at Seal Rocks, Hawks Nest and Pacific Palms are grant funded, and therefore are restricted by the scope of the grant and funding received.
		At Tinonee Public School, the school received a \$5,000 Sustainable Schools Grant from the NSW Government and is working with Council to increase safety on Tinonee's roads. Council also recently received \$130,000 through the Federal Government's Bushfire Recovery for Wildlife and Habitat Community Grant to undertake a range of koala protection initiatives in the MidCoast including a road safety project and koala habitat enhancement at Tinonee.
		Council will continue to seek grant funding to support more greening initiatives across the MidCoast.
		Recommendation: no change
Tinonee Conservation Action Plan	Once the Tinonee Conservation Action Plan (CAP) is completed and learning established, future plans will be identified in locations where significant habitat and greening objectives can be achieved. What is the potential timeline for this the CAP? The Plan needs to be done	The development of the Tinonee Conservation Action Plan is a short term action (2021-2024). Following the completion of this short term action, future plans will be identified in locations where significant habitat and greening objectives can be achieved like Hawks Nest, Smiths Lake, Forster and Hallidays Point.
	quickly to avoid further destruction of habitat for populations like the squirrel glider and koala in areas like Hallidays Point. (Submission 13)	If identified for Hallidays Point, a Conservation Action Plan could complement the proposed location-specific strategy for Hallidays Point. The proposed strategy will provide an early opportunity to retain important vegetation by clearly identifying areas for protection. It will also identify areas of vegetation that should be retained or enhanced and land that can be considered for future rezoning for urban purposes. The proposed strategy will also determine the desired environmental outcome and development opportunities, providing certainty to the community and developers alike. Strategies such as this will provide a long term plan for the retention of important vegetation for conservation and the identification of areas that will have minimal environmental impact for future development.
		Recommendation: no change
Conservation Action Plan Gloucester	The Gloucester township and surrounding semi-rural and rural areas provide ample opportunities for trial projects, supported by a population that is keen to participate. Gloucester Environment Group has highlighted the need to undertake a Conservation Action Plan for the koalas in the area encompassing The Bucketts and surrounds. Council should	The development of the Tinonee Conservation Action Plan is a short term action (2021-2024). Following the completion of this short term action, future Conservation Action Plans will be identified in locations where significant habitat and greening objectives can be achieved.

Summary topic:	Summary of submissions and response:	Response and recommendation		
	immediately undertake a Conservation Action Plan for koalas covering the areas affected by the draft Vegetation Management Policy at Gloucester, Barrington and The Bucketts area. Gloucester Environment Group looks forward to continuing a productive partnership with	A key principle of the draft Greening Strategy is to build partnerships. Council will continue to explore and identify opportunities to partner with the community and community groups to realise the benefits of greening and increasing vegetation coverage.		
	Council. (Submission 26)	Recommendation: no change		
Remnant and mature trees and vegetation	Under Principle 2, it is stated that it can take over twenty years for tracts of mature vegetation to regenerate and this is an underestimate. It takes 100 years or more for native trees to mature to the point where they are providing tree hollows, which is a critical and limited resource for native fauna. Loss of tree hollows due to tree clearing is a key driver of fauna loss. It is therefore critically important that measures are in place to protect habitat	It is acknowledged that individual significant trees or tracts of mature vegetation can take over 100 years to reach maturity and have different habitat values. They also provide more habitat for wildlife and are more difficult to replace if lost, than smaller trees. Principle 2 of the draft Greening Strategy recognises that we need to keep what we have, and this include young and mature trees.		
	trees. Although there is a strong focus on trees with hollows, there needs to be a stronger emphasis on protecting and regenerating young trees that can in future become old growth habitat rich trees.	Not only do individual trees or small stands of trees provide a source of food and shelter, but they can also act as a place of refuge for species like the koala. One purpose of the draft Vegetation Management Policy is to have a process in place for when there is a need to remove tree(s) or vegetation with significant ecological values. This can include identified tree(s) or vegetation which can include important habitat values or whether it forms part of a corridor that links habitats to enable fauna movement.		
	large bodies of bush a like. With increased development pressure in the MidCoast, the Greening Strategy needs to be implemented correctly to protect what we have and improve the landscape for the future. (Submissions 6, 13, 20)	Principle 2 of the draft Greening Strategy recognises that we need to keep what we have, and this include young and mature trees. Council will continue to explore and identify opportunities to educate the community on the benefits of greening and increasing vegetation coverage, along with the importance of isolated habitat trees and the need to allow young trees to mature into old growth habitat trees.		
		Recommendation: Amend wording in first paragraph of Principle 2 as follows: We need to keep what we have, not only in our urban areas but across our natural and rural landscapes. The reality is that individual significant trees or tracts of mature vegetation can take over 100 years to reach maturity. We know that larger trees capture greater amounts of carbon. They also provide aesthetic values, more habitat for wildlife, more shade and are more difficult to replace if lost, than smaller trees.		
Signage	Whilst visiting many seaside destinations for holidays, I am often impressed with the beautiful signage located in the townships, showing their native animals and birds. Council should develop signs that showcase our native animals and birds to visitors to our amazing region. (Submission 16)	This feedback will be provided to Council's Growth, Economic Development and Tourism team for consideration in future signage reviews and when creating signage for the MidCoast. It is acknowledged that the MidCoast environment is important and it needs to be recognised and promoted. Recommendation: no change		
Amenity value	The MidCoast landscape is very much an attraction to residents and visitors, this includes green spaces within the streets. The trees in local streets and backyards must be protected to protect the attraction of the area. We need to have a point of difference to other areas and could be showcasing native plants from the MidCoast. (Submissions 20, 25)	The draft Greening Strategy notes that encouraging the planting of specific tree species in streets can also enhance the character of an area. Principle 4 of the draft Strategy is about renewing our lists of tree species for urban areas, providing guidelines on where and how to plant, and making the information available for landowners and developers to ensure we are all working towards the same greening outcome. The draft Strategy recognises that vegetation and trees can provide a positive sense of place, improve amenity and provide a local identity. Recommendation: no change		
Tree Canopy Mapping	Experts recommend the optimal urban canopy cover to be 35 - 40% (Wollongong City Council). The majority of MidCoast towns and villages would be well below this standard and getting worse. Urban tree, vegetation and biodiversity protections are critical to ensuring this level of green cover, together with urban reserves programs and green streetscaping. (Submission 22)	The proposed Tree Canopy Mapping will be used to set targets for the MidCoast. Forward-thinking councils across NSW and Australia-wide are measuring the condition, diversity, and extent of greening (particularly in their urban areas), setting targets and aligning their operational programs to work towards improving vegetation coverage. The proposed Tree Canopy Mapping and Heat Analysis is also important for climate change adaption, as it can be used to identify 'hot spots' for priority shade planting.		
		The MidCoast targets will be developed with guidance from these other councils and the NSW Government's draft Greener Places Design Guide. Interestingly the NSW Government's draft Greener Places Design Guide indicates that a 10% increase in tree canopy cover on adjacent streets, parks, and reserves or even just a street tree, can add to a property's value.		
		Recommendation: no change		
Holistic approach: Biodiversity Framework	Given the importance of greenspaces to us and our ways of life and economy, Council should adopt policies and programs for urban greenspaces and tree and vegetation protection as part of a comprehensive plan for the environment. It should provide adequate resourcing to such programs and to effectively regulate and enforce environmental policies. It is good that	The recently exhibited Biodiversity Framework is the environmental plan for the MidCoast. The Biodiversity Framework establishes a roadmap for biodiversity to 2030 and beyond. It outlines a range of activities, plans, principles, policies, actions, datasets and management tools in a format that promotes adaptive management. The draft Greening Strategy is just one action of the draft Biodiversity Framework, and some of the draft Greening Strategy actions work in harmony with actions of		

Summary topic:	Summary of submissions and response:	Response and recommendation
	Council is asking for input into the Greening Strategy, the Vegetation Management Policy and the Biodiversity Framework, but it is concerning that these are treated as separate issues rather than incorporated into an overall environment plan. Fragmentation is one of the main enemies of a viable ecosystem, that is why a holistic approach to environmental considerations is so important.	the draft Biodiversity Framework. A large amount of suggested inclusions recommended are covered by the draft Biodiversity Framework. Recommendation: no change
	Looking after our environment doesn't only mean considering plants and wildlife, it also means doing our best to minimise harm caused by human activities such as settlement developments, energy and employment generation. There are targets and plans of action in each of the policies, strategies and frameworks, and they need to come together into one environmental plan to ensure that the benefits of maintaining healthy ecosystems outlined in all these documents can be achieved. Feedback was provided on what a comprehensive environmental plan should, with the feedback including:	
	 a vision and principles for urban and peri-urban greening, promoting a culture of recognition and appreciation of the values of urban and peri- urban vegetation, recognising trees and vegetation as natural assets that have economic value, manage trees and vegetation in urban and surrounding areas like other infrastructure assets while emphasising that natural assets exist in their own right, recognise the needs of iconic wildlife species in assessment and conservation planning and especially the protection and recovery of koalas at Hawks Nest/Tea Gardens and Tinonee. 	
	(Submissions 22, 24, 35)	
Scope of the draft Greening Strategy	The draft Strategy seems really open and the goal of the Strategy is not clear. The scope of the Strategy should be narrowed so Council can direct their effort and resources, and ultimately know whether they are achieving the goal through the principles and actions. The Strategy is a good start, but it is trying to do too much and could be strengthened by baseline	Sitting alongside other strategic initiatives that include the development of a Biodiversity Framework and Climate Change Strategy and Policy, the Greening Strategy acknowledges the importance of our natural environment to the local community. It provides a forward-thinking plan of action that will help us target priority locations, and a platform for gathering evidence to inform a longer term approach to greening.
	data. (Submission 24)	No single project or program can enable us to manage and enhance all of our landscape. Rather it is a complex web of legislation, programs, controls and strategies that interlink to enable this to happen, and this in itself is a challenge. The draft Strategy seeks to address this challenge by providing a simple and easily understood document for the MidCoast. Being the first version of the Strategy, a review will be undertaken within five years, to update the principles based on the data collected. With increased data and learnings from trial projects and investigations, we will have evidence to plan greening activities for future years.
		Recommendation: no change
MidCoast Local Strategic Planning Statement	The MCC Local Strategic Planning Statement from September 2020 seems to have only two mentions of energy. Neither of the mentions are about producing or managing energy and no mention of renewables. It is obvious that this area has huge resources of solar, wind and water to power renewable and sustainable energy and this should be a major plank of Council's strategy for now and the future. Jobs in these industries can provide much more employment than any fossil, nuclear, hydrogen or biomass generation without all the attendant damage. (Submission 22)	The preparation of a Climate Change Policy and Strategy is identified as a short term action in the draft Greening Strategy. The Policy provides a framework and a set of guiding principles for climate action, setting ambitious targets for climate mitigation, committing to reducing the risks of climate change to Council's assets and operations and supporting the community's efforts to do the same. The Strategy is the first phase of a two-part program of work and is focused on Council's assets and operations. The second phase of the project will focus on working with the MidCoast community to help them to reduce their emissions and increase their resilience to climate change. The Climate Change Policy and Strategy was adopted on 30 June 2021. Council will now need to determine if and what funds could be redirected to funding the actions and projects outlined in the Climate Change Policy and Strategy
		It should also be noted that the MidCoast Local Strategic Planning Statement will also be reviewed over the next six years and will be able to reflect current and completed strategies Recommendation: no change

Summary topic:	Summary of submissions and response:	Response and recommendation
Legislation	Urban areas along with the rest of the region are covered by NSW Government policies such as the ironically named <i>Biodiversity Conservation Act 2016</i> which virtually allowed open slather on destruction of vegetation. When Council knocks back an inappropriate development, the NSW Government can and does override that decision on the grounds that it is state significant. Today all planning applications have to be lodged through the NSW Government's Planning Portal. Does that affect any flexibility that councils might have had?	No single project or program can enable us to manage and enhance all of our landscape. Rather it is a complex web of legislation, programs, controls and strategies that interlink to enable this to happen, and this in itself is a challenge. Knowing who to contact and what controls apply over private property can be confusing. It is also a challenge to know who to contact to report illegal clearing. If you are unsure, please contact Council who will be able to help identify the organisation or government body responsible for non-compliance.
	There seems to be lots about what can be removed, but not enough about what can be renewed, replaced or created in the way of habitat. (Submission 22)	Other organisations and government bodies contribute to the management/protection of the MidCoast landscape for example the local Landcare groups, NSW Rural Fire Service, Crowns Lands, Forestry Corporation of NSW, Hunter Local Land Services and National Parks and Wildlife Service.
		Often Council is not the organisation responsible for large scale clearing, with a lot of large scale clearing occurring as a result of Private Native Forestry administered by Local Land Services.
		Under State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017, clearing of native vegetation above the Biodiversity Offset Scheme threshold is not regulated by councils. Clearing above the threshold requires an approval from the NSW Native Vegetation Panel established under the Local Land Services Amendment Act 2016.
		Development Applications can also result in clearing of vegetation over the Biodiversity Offset Scheme threshold and this is regulated by Council under the <i>Biodiversity Conservation Act 2016</i> . Clearing of threatened species, ecological communities or protected plants that are not regulated by councils under a Tree Preservation Order need to seek a biodiversity conservation licence from the NSW Department of Planning, Industry and Environment. All of this demonstrates that our landscape is made up of a complex web of legislation, programs, controls and strategies that interlink.
		Recommendation: no change
Recycling	Recycle more materials like road surfaces, building standards and materials, rainwater tanks and solar panels. Need to have better use of recyclables (e.g. glass for roads or crushed building materials for roads). Better ways are needed to deal with soft plastics, food and other waste. (Submission 22)	This feedback will be provided to Council's Waste team for consideration in future reduce, reuse, recycle and recover programs for the MidCoast. It is acknowledged that the MidCoast environment is important and it we need to properly deal with waste like soft plastics, food waste and building materials.
		Recommendation: no change
Settlement and Expansion and Redevelopment Opportunities Analysis Report (SEROAR)	Looking at the Settlement and Expansion and Redevelopment Opportunities Analysis Report it seems the community consultation has not happened yet. Nevertheless large tracts of land are being opened up at Brimbin and elsewhere. Brimbin is identified as a new urban area in the analysis report. Can this development coexist with the bushland recently acquired that the draft Greening strategy mentions? How will Brimbin impact the acquired bushland? (Submission 22)	The Settlement and Expansion and Redevelopment Opportunities Analysis Report is a separate project to the draft Greening Strategy. The analysis report was on exhibition from 24 May 2021 to 1 July 2021. Brimbin is a proposed new town and is located 8km north-east of Taree. The site extends from the Lansdowne River to the east through to the Dawson River in the west, straddles Lansdowne Road and covers an area of around 3,700ha. The land for Brimbin is now rezoned and the next phase is to decide how the town will be laid out and where parks, roads and services will be located. This detailed master planning process will be undertaken by Roche Group (the developer) in consultation with the Council. Extensive areas of native vegetation are also located on the site, much of which will be protected. The residential and commercial parts of the town will be located on the eastern side of Lansdowne Road, while industrial and agricultural employment development will be located on the eastern side of Lansdowne Road. Brimbin has already received biodiversity certification which resulted in over 1,000ha of bushland being dedicated to National Parks and Wildlife Service. Council has worked with the developers and agencies like National Parks and Wildlife Service to establish the reserves around Brimbin. The land purchased by Council in 2019 fronts the Dawson River and contributes to the protection of the headwaters of the Dawson River and maintains a vital link from the river to Brimbin Nature Reserve. Recommendation: no change
Road verges	Do not chop and spray road verges, as they are a rich habitat for insects and small birds. Instead replant road verges with native grasses such as kangaroo grass. It would be more economical to reseed verges with native grasses. (Submission 22)	This feedback will be provided to Council's Infrastructure and Engineering Services, and Natural Systems teams for consideration. It is acknowledged that the MidCoast environment is important, and that road reserves act as wildlife corridors and provide vital habitat. The environmental values need to be protected wherever possible, while ensuring road safety. Recommendation: no change

	Summary topic:	Summary of submissions and response:	Response and recommendation		
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Item action in the draft Greening Strategy. It is important that we are putting our efforts into retaining important vegetation and trees that contribute to our landscape, which if removed can take years to replace.Responsibility of greening in urban areasImpetus for greening in urban areas appears to be mainly on Council and public land, with minimal responsibility of private individuals. But is Council resourcing this sufficiently, and does Council have sufficient land available to achieve this? (Submission 24)Greening is a shared responsibility and Council, we can work towards greening our neighbourhoods using these partnerships. Effective community, engagement and partnerships are essential for the success of every aspect of the draft Strategy. It is important that Council champions the Strategy, leading by example and working with the community to achieve the key actions.Focus of draft Greening Strategy: ruralConcern about the draft Strategy's predominant focus on urban areas, when the vast majority of land in the MidCoast is rural. Council should be proactive in promoting the retention and expansion of native vegetation on rural lands. (Submissions 22, 25, 30, 32)Hig fraction community engagement and partnerships are essential for the success of every aspect of the strategy. Council and in NSW, and this is administered in the MidCoast by Hunter Local Land Services. This is the approach applied acress the MidCoast.Council council and uspansion of native vegetation on rural lands. (Submissions 22, 25, 30, 32)Council recognises that effective community engagement and partnerships are essential for the success of every aspect of the strategy. Council along with Goverrament Agencies is hereading in rural and priver shares on the benefits of vegetation coverage. This could include education programs with Hunter Local Land Services and play an	Vegetation Management Policy		individual significant trees or tracts of mature vegetation can take over 100 years to reach maturity. One important action of the draft Strategy to help keep what we have is the development and consultation on vegetation management controls that		
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Recommendation: no change					
			Recommendation: no change		

Summary topic:	Summary of submissions and response:	Response and recommendation		
Weed management	 Some suggestions for weed management in the MidCoast include: the excellent Council publication on invasive weeds needs to be republished, and not just be available online, there needs to be community awareness sessions on invasive plants, many people are unaware that the plants in their garden are harmful to bushland and waterways, it would be a good idea to remove weeds like lantana along roadside before they take over, educate landowners on the importance of collectively removing exotic species and weeds. When landholders do not participate, those gains can steadily be lost, use the Backyard Bushcare program to educate landowners about weeds, it makes no sense to continue to engage contractors to remove species from bushland and not do anything about the source of the weed propagules. (Submissions 6, 29, 30, 36) 	Council's role is to work with landowners and occupiers to help them meet their general biosecurity requirements including weeds management. There's plenty that the community can do to help us manage weeds across the MidCoast and keep our natural environment beautiful. Council's website provides a lot of useful resources, information about projects currently underway across the MidCoast and ways you can assist. Unfortunately many weeds are spread by wind and birds which Council has little control over. Wherever possible, Council does focus on addressing infestations upstream where possible. This feedback will be provided to Council's Natural Systems teams for consideration, along with the recommendation to provide hard copy publications. Council currently has staff that work with landowners, and interested landowners are encouraged to contact Council to see what assistance and guidance can be provided for weed management. It is acknowledged that weeds in the MidCoast is a problem and a shared responsibility. Council along with Government Agencies like Hunter Local Land Services can play an integral role in weed management. Council recognises that effective community engagement and partnerships are essential for weed management in the MidCoast. Recommendation: no change		
Draft Greening Strategy: Action 1.3	Action 1.3 'undertake a greening project in a priority location' is vague. (Submission 24)	This is somewhat vague intentionally, with the priority location being identified following the Tree Canopy Mapping and Heat Analysis. This project will map and analyse the tree cover in our towns and villages, to increase our understanding of the urban 'hot spots' across the MidCoast. Typical 'hot spots' can be town centres and industrial estates where roads, carparks, footpaths and buildings dominate; along with some residential neighbourhoods with large road reserves and limited street and garden trees. The heat analysis will be targeted to urban centres like Taree, Forster-Tuncurry and Gloucester, which are likely to house these 'hot spots'. When complete, the Tree Canopy Mapping and Heat Analysis will help identify priority locations for targeting tree planting programs. A schedule will be developed outlining how and when priority locations will be targeted. Recommendation: no change		
Draft Greening Strategy: Principle 2 clarity	Principle 2 needs strengthening to something like 'Keeping what we have and replacing what we've lost' to link with draft Biodiversity Framework. If we want to look after wildlife (e.g. koalas) we need to plant green vegetation corridors. (Submission 5)	 Principle 2 and its key projects and actions relate to keeping and protecting what we have, and Principle 3 discusses building partnerships with landowners to plant trees and where possible replace what we have lost. These two principles while separate, achieve this. A supporting project of Principle 1 is biodiversity corridor mapping. One aim of this mapping is to increase planting in corridors to help reconnect fragmented areas and improve habitat corridor. This is consistent with the draft Biodiversity Framework. Recommendation: no change 		
Significant bushland program	Action 2.3 relates to a program that conserves significant bushland in perpetuity. Is this plan focusing on urban and peri-urban areas or the whole of MidCoast? Purchasing bushland to preserve in perpetuity would be unlikely in existing urban areas. This implies that Council will be purchasing rural land to offset urban clearing. This is obvious potentially more feasible in growing urban areas i.e. Smiths or Hallidays Point. A first step would be identifying these potential areas. (Submission 24)	Council has a role in identifying lands of high conservation value under threat that should be protected, seeking funding sources and facilitating this process. By adopting procedures and dedicating funds to secure identified high priority bushland parcels, Council will be able to facilitate purchases when opportunities arise and ensure that environmentally significant bushland is protected in perpetuity. There are priority bushland parcels across the MidCoast in private ownership which contribute significantly to the natural landscape. More detail will be provided during the investigation and development of the program conserves significant bushland in perpetuity. Recommendation: no change		

Submission	Submitter name:	Submission	Submitter name:	Submission	Submitter name:
number:		number:		number:	
1		13		25	Ian Morphett on behalf of Myall Koala and Environment Group
2		14		26	Tibor Kovats on behalf of Gloucester Environment Group
3		15		27	
4		16		28	
5		17		29	
6		18		30	
7		19		31	
8		20		32	
9		21		33	
10		22	Ariel Johnson on behalf of Midcoast Environment Group	34	
11		23		35	
12		24		36	