

- Help multi- unit dwellings to recycle better and compost
- Apply pressure on supermarkets and manufacturers to reduce packaging
- Advocate for CDL and the banning of plastic bags
- Provide drop off locations for e-waste and other wastes council does not collect
- Address litter in waterways
- Have more recycling stations in public places and educate on public place recycling

Inclusion of additional actions in strategy

Where a number of comments were received on a common issue that related to an action, the action was reviewed to see if it needed to be strengthened and the inclusion of further actions was considered.

The following generalised comments (mainly comments on same theme) have warranted the inclusion of new actions in the strategy:

- *How do I know what to recycle and what happens to the recyclables*

This will be considered under the action: *Promote householder behaviour change to decrease recyclables in residual bin & minimise contamination in recyclables bins*. However a new short-term action has been added to: **Develop regional educational resources for councils to engage the community to increase understanding of what is recyclable and what happens to recyclables.**

- *Littering*

Comments around littering and the need for an anti-litter campaign will be considered under the action to: *Undertake education & awareness campaigns to reduce littering*. However a new short term SHOROC action has been added to: **Undertake a regional anti-litter campaign**

- *Illegal Dumping*

Comments around the environmental and financial cost of illegal dumping will be considered under the action to increase the awareness of the impacts of illegal dumping and regulations. However an action has been added for SHOROC to: **Undertake a regional illegal dumping campaign.**

- *Common Waste Collection System*

Comments questioning how the household common waste recycling system will work in detail will be addressed as part of the planning for the new system and the community engagement around the new system

Specific comments reviewed that warranted additional actions include:

- *Incentivise recycling over garbage through rates*. An additional action included to: **Continue to incentivise recycling over disposal**
- *Have agreements with developers to undertake longer term waste initiatives in new shopping malls or precinct developments and penalise to offset environmental impact if not done*. Whilst this relates to state significant development, an additional action was added to: **Advocate to NSW Government for inclusion of waste initiatives in state significant developments**
- *Support National Recycling Week and International Composting Week events and hold local weeks*. An additional action was added to: **Support national and state waste avoidance and recycling events**

The outcome of the community consultation on the draft strategy has resulted in improvements to the actions within the strategy and affirmation that the strategy direction taken meets the community's areas of concern. The tools used to promote the strategy have raised the community's awareness of how the regional waste management system works and the pivotal role that community plays in effective and efficient resource recovery.

Table 1: Stakeholder engagement methods

Stakeholders	Method of Engagement	Level of Engagement	Outcome
SHOROC Board	Presentations & agenda papers	Inform & empower	draft strategy approval
GMAC	Presentations & agenda papers Agreement on strategy framework Potential additional issues workshop	Inform, consult & involve	Established scope, framework approved including vision and priorities, endorsement of draft strategy
Councillors	Presentation to council meetings	Inform, consult & involve	Councillor feedback on draft strategy
Directors	Presentations, comments on draft strategy	Inform and consult	Signoff on draft strategy
Regional Waste Working Group	Regular meetings, collaboration on framework for strategy development, priorities and actions; input to drafts	Consult, involve & collaborate	Developed and agreed strategy, Provide data, comment on sequential drafts, prioritise and collaborate on actions; develop targets
NSW EPA	Presentations, meetings	Inform, consult	Strategy that meets the funding conditions from EPA
Key internal council staff	Cross council workshops; one on one meetings; comments on issues paper; provision of ideas and actions	Inform, consult and involve	Input to priorities and collection of potential actions
Pittwater Council Natural Environment and Leading and Learning Reference Groups	Community presentation	Inform, consult, involve,	Comments on draft strategy
Kimbriki Sub Committee	Meetings 19 March, 18 June	Inform, consult, involve	Feedback on approach taken and draft strategy, championed strategy within council and the community.
General community	Council and SHOROC websites, print and social media	Inform, consult	Feedback on draft strategy
NSROC	POG, one on one meetings	Inform, consult	Identification of synergies between the regions
EPA	Individual meetings, presentations; workshops	inform	draft strategy meeting funding requirements
Waste management industry – SITA, URM	Individual meetings	Inform, consult, involve	Comments on draft strategy

Table 2: Strategy Outputs

Product	Purpose	Audience	Media	Output
Release of strategy by Minister and SHOROC President	Promotional event to engage community to have their say	Invited guests	Event	Release, event brief, photos; 108 invitations including media outlets; 32 attendees
75 page colour detailed draft strategy	EPA requirement & internal consultation	Internal councils, KEE and EPA	Online;	Online draft strategy, print on demand
12 page colour plain English public draft Strategy	Community consultation	External stakeholders	Online, print	200 print run; online public draft
75 page Final Strategy	EPA requirement Direct regional and local waste initiatives	Internal, External stakeholders, EPA	Online	Online strategy, print on demand
PowerPoint presentation	Communications tool	Internal and external stakeholders	PowerPoint	13 presentations
Too Good to Waste logo	Promotional identifier and ongoing brand recognition for strategy initiatives		Print, online	3 logo forms
Infographic	Visual summary of strategy; Subsets to brand individual actions	External stakeholders	Banner, online, print	2 banners for use in council customer service areas; online infographic; individual graphics for all images
Communications kit	Support community engagement activities and deliver key messages	Council stakeholder engagement officers	Online; print	Newsletter blurb; Mayoral column; infographic; 2 Too Good to Waste web tiles; website landing page copy; tweets
Media releases and council columns	Promote strategy, seek community consultation	General community	Print	2 x SHOROC media release; Pittwater media release Article in Manly Daily on 7 Sept; Aaron Hudson on 2UE with Stuart Bocking on 8 Sept Pittwater and Manly council columns in MD
Website and social media	Promote strategy, seek community consultation	General community	Online	5 SHOROC web pages -2656 hits to 4 Sept Manly, Mosman and Pittwater web tile and content with link to SHOROC website
Online survey	Allow community to have their say	General Community	Online	50 completed surveys 75% by computer, 16% by smartphone; 9% by tablet
Online media	Promote strategy, seek community consultation	General community	Online	Manly Latest News article; Mosman news post Warringah Projects Open for Comment News about Pittwater article; SHOROC e-news sent to 1,581 subscribers with 991 opens
Social media	Promote strategy, seek community consultation	General community	Online	Over 30 posts and tweets on Facebook, LinkedIn and Twitter to almost 4,000 followers.

Table 3: Comments by Strategy Focus Area

Sustainable Infrastructure Solutions
<ul style="list-style-type: none"> • Councils to market sale of soil, compost, gravel and other garden resource products from Kimbriki • Increase awareness of what Kimbriki does, including buyback centre and Eco-house • Help charities dispose of waste cheaply that people dump in their bins • Planning the Common Waste Collection System <ul style="list-style-type: none"> ○ Sealed non vented caddies should be used in the new collection system ○ MUDs not adequately addressed in planning for the new collection system ○ Keep separate paper and comingled recycling bins under new collection system
Produce less waste
<ul style="list-style-type: none"> • Initiatives to reduce use of disposable coffee cups • Councils lead the way in making more sustainable purchasing decisions • Council events be more sustainable • Access to composting for unit dwellers • Complementary compost bins and worm farms and complementary courses on worm farms and composting • Offer a commercial composting service • Offer avenues for communities to live sustainably regardless of income and living conditions • Further access to free water to refill bottles • Recover unwanted food and reuse • Support accessible farmers markets and more portioned purchasing of fruit/veges/pulses • Support reuse sites like freecycle and a restoration/repair centre • Put pressure on supermarkets and manufacturers to reduce packaging • Have a local reduce and reuse week; support National Recycling Week and International Composting Week events • Promote hand washing by soap to avoid plastic bottles and plastic bags of wipes • Schools <ul style="list-style-type: none"> ○ give regional support for horticultural assistance in schools ○ engage young people and kids outside of school ○ run a program similar to Taronga Zoo's Project Penguin ○ get cut down/shorter versions of 'Trashed' and 'Bag it' to show at schools • Plastic bags: <ul style="list-style-type: none"> ○ Advocate for ban on plastic bags ○ Get shopping centres to change bags to compostable ○ Advertise where to get compostable bags ○ Ban non-essential plastic bags or charge 50c levy on plastic bag purchase ○ Make and implement effective policy to reduce use of plastic bags and all plastics that are not recyclable
Increase recycling
<ul style="list-style-type: none"> • Advocate for introduction of CDL • Household recycling <ul style="list-style-type: none"> ○ Need bigger bins for recycling ○ Increase the range of items that can be recycled and simplify messaging (eg plastics) ○ Raise awareness of what is recyclable and how to recycle eg how clean bottles need to be, what to do with lids etc; as well as what happens to recyclables

<ul style="list-style-type: none"> ○ Provide ways to recycle metals including aluminium foil ○ Incentivise recycling over garbage through rates ○ Provide in-house bucket/bag/bin for convenient recycling in the home, especially in MUDS to discourage plastic bag use ○ Provide Executive Committees of Owners' Corporations with clear displays on recycling plus reasons why it should be taken seriously ○ Move to one recycling bin now ○ Infographic on how to recycle ○ Encourage leaseholders to be more responsible right from when they sign up to rent. ● Public place recycling <ul style="list-style-type: none"> ○ Councils to set up more recycling stations in public places ○ Encourage shopping centres to provide more bins for different rubbish ● Plastic bags <ul style="list-style-type: none"> ○ Ban plastic bags in recycling bin ○ Support additional recycling for plastic bags or offer a plastic bag recycling service ○ Offer residents recyclable shopping bags with receipt of council rates ● Business recycling <ul style="list-style-type: none"> ○ Improve system for requiring Waste not DCPs and ensure compliance ○ Get business owners to be more responsible for commercial purchasing decisions. ○ Encourage and reward manufacturing business owners that produce less packaging ○ Manufacturers to use products and packaging that are easily recycled ○ Strike agreements with developers to undertake long term waste initiatives where new shopping malls or precinct developments are planned and penalise them if don't happen to offset the environmental community impact ○ Encourage business owners to purchase sustainable products with less packaging ● Clean up waste <ul style="list-style-type: none"> ○ Sort through clean up waste for good stuff and sell rather than crush ○ Work with charities and social enterprises to get good stuff out of clean-up waste ○ reuse mattresses ○ Allow councils to have same scheduled council clean up days ○ New strategy for council clean up and general waste disposal at Kimbriki
Make disposal of problem wastes easier
<ul style="list-style-type: none"> ● Issue of problem wastes once Kimbriki infrastructure built ● How are we going to deal with asbestos? ● Provide more drop off locations for items not normally collected during clean up days – have dedicated location for collection of used/left over motor oils, paints and other chemicals. ● Provide more opportunity for household chemical pickup to ensure these aren't landfilled ● Local drop off points for e-waste and other waste council does not collect
Keep public places clean
<ul style="list-style-type: none"> ● Littering <ul style="list-style-type: none"> ○ Have adequate litter bins in public areas and keep well maintained ○ Paint over graffiti

<ul style="list-style-type: none"> ○ Pretty bins ○ A litter free environment ○ Raise awareness about recycling of litter ○ Taxing all visitors to Manly so council can keep harbour clean ○ Councils use compostable doggy bags so when littered and ends up in ocean will break down ○ Do something about all the poo bags loose in parks ○ Run an anti-litter campaign ○ Design better recycling bins with better signage that tells people what recyclables are used for ○ Littering detracts from council spend ○ Address marine litter systemically through the stormwater system ○ Educate residents and visitors on minimising waste going into waterways ○ Reduce amount of syringes/sharps from beach locations ○ More to catch litter in gutters so doesn't end up on beaches and inside marine animals ● Illegal Dumping <ul style="list-style-type: none"> ○ Raise awareness of illegal dumping environmental impact ○ Dumping detracts from council spend
Other
<ul style="list-style-type: none"> ● Track depletion of raw materials as incentive for resource recovery ● Importance of language used around waste ● Behaviour change key to strategy success ● Strategy needs to show how MUDS will be treated in new system ● Focus efforts to make a difference near term, and have clear plan for medium to long term ● Clear communication of priorities, goals and benefits; meaningful and easily understood measures of success ● It's great to see a strategy put in place for our waste. It is the 21 century after all! ● Strategy once agreed needs to be implemented asap

Feedback from consultation on *Too Good to Waste*

Kimbriki Sub-Committee

Meeting 19 March 2014: Issues and opportunities for consideration in developing the strategy

- Advocating for container deposit legislation
- Improvements to public place street litter bins for recycling
- Depletion of raw material tracking as incentive to resource recover
- Food waste – application of a user pays system to incentivise waste avoidance followed by food recycling
- Local food production, organic markets
- Urban farm
- Restoration/repair centre and links to community groups (eg men's sheds)
- Recognition of KEE's Eco-House and Eco-Garden as valuable regional asset leading way for innovative waste management
- Regional support for school and community gardens, particularly for horticulturalist assistance
- Regional schools communication program on common waste collection system
- Programs to engage young people and kids outside of schools. KEE developing regional kids' club Eco-Mites
- Hazardous materials drop off centre
- Local Reduce and Reuse Week
- National recycling week and International Composting Week

Pittwater Natural Environment Reference Group

Meeting 14 May: Feedback on draft structure and priorities

- Clarify what SHOROC would like to see from groups such as the NE Reference Group?
How can I find out what goes in what recycling bin – can I put food contaminated plastics in my recycling bin?
- What will happen to our waste once Belrose closes and Kimbriki not ready to receive it – will it have to go outside the region?
- Who's going to make the shopping centres change their bags? And do they know which bags to change to?
- Where can I buy compostable bags?
- We should stop people using plastic bags in their recycling bins

Kimbriki Sub-Committee

Meeting 18 June: Feedback on draft structure, priorities

- More figures in garden waste slide
- Greater mention of schools in strategy
- More emphasis on reduce/reuse/recycle
- Valuing food more – garden and organics emphasis
- What to do about problem wastes – eg batteries, fluorescent lights
- Important to include actions around business recycling
- Advocate for state-wide education in schools, unis and business

- Look at working with charities for clean-up collections – Sutherland as case study
- Should we elevate advocacy on CDL? For further discussion. Maybe do motion at council.
- Involve Rob Stokes as Minister for Environment and local member in launch of campaign
- Involve schools and children – big influencers

- Importance of language used around waste
- Importance of Kimbriki infrastructure solution to determine feedstock requirements
- Education is important for understanding
- Behavioural change. Look at satellite areas to change things – local recycling/data opportunities identified
- Feel good stories to increase awareness of Kimbriki
- Behaviour change key to strategy success
- Culture will require new thinking
- Strategy very good and good work to get all councils in one direction
- Thank input from KSC and recognise the ideas of the KSC incorporated through the strategy
- Kimbriki front and centre of the strategy and its success
- Good job pulling 'rats and mice' together
- Business programs, business advisory services grants?
- Like to see more numbers and targets and fun facts to engage people
- Wholehearted support for Liz's work

Councillor Briefings on draft strategy

Manly 14 July 2014

- Directed at single home owners – need strategy to show how MUDs will be treated in new system
- Why recyclables in one bin and not still 2 bins
- How will we get food into green bin – caddies and liners
- What happens to clean up waste? Can't we recover some of this material

Pittwater 14 July

- Frequency of bin collections
- How to get food scraps in green bin – options for caddy/cornstarch
- What happens about problem wastes
- How do we know what can be recycled – how do we keep up to date?
- What is garbage – what will be in the garbage bin with system changes
- What about asbestos
- Is Kimbriki licensed to accept food – no but will be made inert; we also need more on what can be recycled
- How much do we recycle from clean ups?

Warringah 15 July

- What will end up in red bin in new system - things that can't be recycled – plastic film, bags, ceramics
- Need change behaviour to get people to put meat in green bin without plastic bags – need to start 2 years early
- Lot of developments happening with no requirement for Waste not DCP – lobby to improve the system
- Dumping, littering detracting from council spend
- Problem with hazardous materials for facility will be very important
- Always amazed at the amount of packing – needs to be addressed
- Can we tackle how to deal with unwanted food?
- Waste not DCP does not apply always – can we do anything about this?
- Project Penguin run by Taronga Zoo works well using school children as educators- can we use this model more widely?
- Unwanted food going to waste- can we recover and reuse

Mosman 22 July

- What's stopping us going for a combined recycling bin now?
- Will the new facilities at Kimbriki mean increased costs for council?
- What simple two messages need to be delivered now?
- Importance of education in the new system

Pittwater Natural Environment Reference Group 13 August 2014

- Will the items placed in the new red bin continue to be put in landfill or where will they go?
- What will be the new collection process for the garbage bins?
- Who is releasing this strategy and when will it be available for review?
- How does the draft strategy fit in with other government programs on waste?
- What will happen when the Belrose station closes?
- Will plastic bags continue to contaminate the recycling process and can the State and
- Federal Government have Woolworths or Coles introduce compostable plastic bags the same time as the new legislation is released?
- Can the State and Federal Government have Woolworths or Coles introduce compostable plastic bags the same time as the new legislation is released?

Pittwater Leading and Learning Reference Group 27 August

- Will the items placed in the new red bin continue to be put towards landfill and where will that go?
- What will be the new collection process for the garbage bins?
- What is the future for disposal of Plastic Bags and Nappies?
- Can the State and Federal Government have major chain stores introduce compostable plastic bags the same time as the new legislation is released?
- Why is there a Landfill levy?
- What will happen to the disposal of bulky items such as mattresses and tyres and will there be additional waste drop off locations?

Manly Council Waste Committee 10 September

- Why are we mixing comingled with paper in the new system rather than source separating in the home?
- Sealed non vented caddies should be used in new system, rather than vented caddies with genetically modified corn starch bags and potential for contamination with plastic bags
- MUDs are not addressed in the new waste system, particularly those that use private waste contractors
- Hold a workshop across the councils to develop an advocacy plan including support for Container Deposit Legislation (CDL) and legislation to ban single use plastic bags (regardless of composition)
- Encourage the Waste Contractors and Recyclers Association to advocate for CDL
- Marine litter is increasing and needs to be systemically addressed through the stormwater system
- Fishers litter, particularly plastic bags including bait bags
- Suggest presenting to the Sydney Coastal Council on addressing coastal waste issues
- Talk to council reps on the Coastal Council's Technical Committee regarding marine litter issue

Feedback from online survey to 4 September 2014 – 50 respondents

What is the most important part of the strategy to you?

- Getting people to separate their paper/ glass / household rubbish
- It's important to carefully dispose of waste correctly as our population is rapidly growing and as individuals, we need to do our part in appropriate recycling, etc so as to not interfere with new growth (be it natural or man-made progress) to keep the environment safe and leafy, recreational areas clean and usable for future populations.
- Generate as little waste as possible and recycle what I can.

- Composting and recycling
- Effective recycling of household waste
- To use and reuse what you can and recycle properly wherever possible
- Recycling begins at home.
- Composting vegetable peelings Collection of green waste
- I think getting people aware of your project and getting them inspired to help.
- Keeping waste out of landfill through reduce, reuse initiatives and commercial composting or improved recycling services (think plastic bags/food packaging).
- Identifying ways to reduce waste and getting community ownership of the issue
- Find clever ways to reuse things
- Getting all councils to work together
- making sure we start to look at waste as a resource and start to close the loop
- Placing the right objects in the right bin and keeping garbage trucks off the road.
- Getting business owners to be more responsible for their commercial purchasing decisions, ie. packaging, which has the most impact on waste control. Customers don't get a choice about the wrapping of imported products, they just buy and dispose of the waste.
- Not wasting resources
- Knowing what's in our waste so we can work out the value off what we are throwing away
- Taking care of our planet
- Doing my bit to reduce, reuse and recycle it can encompass all of the others.
- Reducing my family's waste by trying to purchase and consume less products
- Recycling as much as possible
- Compost/worm farm food scraps Keep waste out of landfill
- Putting more pressure on large supermarkets to reduce packaging on fresh produce and make can and bottle producers (and local Councils) advocate a recycle/rewards program.
- Lost cost landfill and recycling.
- removing plastic bags and single use cups
- Reduction in containers, in particular plastic wrapping and bags
- Stopping as much waste going to the land fill.
- Composting on a big scale and taking food waste out of landfill
- Encouraging reuse
- Ensuring the minimisation and reduction in the use and distribution of plastic bags.
- Coordinating and focusing our efforts to make a difference in the near term; and having a clear plan for the medium and long term. And then communicating the plan clearly and engaging all members of the community
- a litter free environment
- More information on recycling
- Trying to reduce waste seems the most sensible strategy. We try not to use plastic bags, use only tupperware for the kids' lunches, etc. - limit "single use" packaging

What should be the highest priorities for councils to focus on?

- To show the advantages of proper waste management for families and how it can help keep your council rates down.
- Keeping an eye on waste disposal, having enough bins in public areas for waste, which I feel there are in Warringah and painting over hideous graffiti and tagging when it surfaces around the area. Dog poo is also an issue but maybe not as much as general waste.
- Education- begin in schools. The level of ignorance is extremely high. Provide Executive Committees of Owners' Corporations with clear concise info charts on recycling for display boards plus reasons why we should be serious about it.

- Education based on the reality of what I chuck in the bin. Explain in pictures what happens to each category of waste. Eg general waste goes to x landfill and decomposes at x rate or not at all. How fast is the space being filled etc? And where does the paper go? What happens to it? Etc -that might make me understand why I need to recycle more.
- Composting
- Make/improve an economic advantage out of recycling waste, thus lessening the financial burden upon ratepayers.
- Education for high-rise flat-dwellers
- Reducing the amount of syringes/ sharps from beach locations. More bins at bus stops. In house bucket/ bin to take down to recycling for units.
- Collecting putrescible waste weekly to use as part of green recyclable waste. Microwave before dumping. Likewise microwave disposable nappies' Perhaps have an onsite shredder Put pressure on Coca Cola and other drink packagers to include a refund for empty containers . Bottle and can return refund centres to to operate at supermarkets and tips.
- Teaching people to reduce, reuse and recycle rubbish themselves. You need to inspire them to do this.
- As above
- Recycling Waste avoidance
- Raise awareness about recycling Litter
- Reducing the number of domestic bins we need to store. Composting all waste not just green waste. Taxing all visitors to Manly so council can keep the Harbour clean
- plastic bags in shops should be compostable doggy bags littering parks should be compostable so when they end up in the ocean they will break down
- Making proper use of council clean up waste .ile sorting thru the good stuff and selling it versus just crushing perfectly good items that others grow out.
- Where manufacturing is done in council managed areas, to encourage and reward business owners to produce less packaging ie. pharmaceutical companies, light industrial. Where there are plans for development of new shopping malls or precinct development in council areas, striking agreements / understandings with developers to undertake long term waste initiatives and if necessary penalising offenders with hefty fines, to offset the environmental community impact. Encouraging and promoting leaseholders to be more responsible right from when they sign up to rent.
- Working with charities and social enterprises to get the good stuff out of cleanup waste and give it to those in need Do something to reuse all those mattresses
- Measure regularly what's in our waste so councils know how to target education to reduce recycle
- Helping to educate and facilitate a better path forward
- Education Leading by example
- Focus on the positives of recycling Educating people how much can be recycled especially electronic items such as computers/tvs Educating people that compost and up-cycled items can be purchased from Kimbriki Providing more opportunity for household chemical pickup to ensure these don't go into landfill Encouraging
- Manufacturers to use products and packaging that are easily recycled - I think most people want to recycle but it's not often clear if certain packaging can be recycled
- Councils should set up more recycling stations where individuals can recycle their own bottles and cans which in turn generates money for local charities and community groups
- Cost of tipping/fees
- composting green and kitchen waste should be easier for households
- Recycling of food waste Getting people using products and packaging that will decompose and break down
- Offering avenues for communities to live sustainably regardless of income and living conditions (e.g. renting in an apartment but able to compost, wormfarm, use solar energy, recycle water)

- Educating residents and visitors on minimising waste going into our waterways. As the LGA's all have high visitation from visitors over Summer the education needs to be broader than just the residents.
- Increasing the things they will accept for recycling. Legislating certain items to be stopped being produced (like styrofoam) which can't be recycled, despite the symbol. Endorsing & subsidising people who BYO cups/crockery/plates to encourage less single use stuff.
- Communication and engagement. Without this platform, we cannot make sustainable progress.
- Land fill reduction
- litter free environment including marine environment
- Making recycling easier
- Incentives to reduce waste are hard - but PLEASE can't we ban plastic bags like some of the other states??? The rubbish recycling (3 stream) is simple, and it is great that Mosman Council has so many extra collection days (e-waste this weekend!). Education is good - the public schools do a good job of this
- Less landfill Education of others to act

Are there any other actions we should include?

- Collect food waste in green bin.
- Composting facilities
- i believe there is a council that offers financial benefits to households that collect their waste properly
- I think the council is doing well with taking action with waste issues
- Through the management of Kimbriki, council should offer and promote the sale of soil, compost, gravel and other garden resources.
- Education on how waste gets into our waterways.
- In Home containers to aid recycling in high density living. To make recycling convenient in units.
- Ban non-essential plastics bags or charge a 50c levy for each carrier bag to be added at the end of purchase.
- Nope. Well done!
- Support farmers markets (The Warriewood market is on Friday and therefore not an option for those of us who work/commute) Begin an initiative that promotes discount coffees from retailers and discount purchasing of reusable coffee cups - for locals on the beaches before summer Put pressure on retailers to reduce plastic bag use in the area - and support with additional recycling for plastic bags
- Like to see more programs to reduce food waste such as Ozharvest Would also like to see an anti-litter campaign
- Make recycling bigger. Something in schools
- Show how all 4 councils work together
- replace council doggy bags with compostable bags recycle better from clean up waste
- Help charity dispose of waste cheaply that people dump at their bins
- Leading the way in making more sustainable purchasing decisions, working hand in hand with consumer advocacy bodies, to encourage residents, but more importantly business owners as they have more money to spend on acquisitions, to purchase sustainable products, with less packaging.
- Do something about all the poo bags loose in parks
- Tell the community what happens to their waste and \$\$\$ wasted
- Incentives such as rate rebates
- Council events need to be more sustainable. Food items need to come in recyclables and should minimise harmful food
- Bring back the General Cleanup so that one person's trash can again be another person's treasure.
- Get more people along to the eco centre to be inspired by Peter Rutherford - especially kids!

- Further access to free water to refill bottles, more support to local grocery businesses which limit packaging.
 - I would like to see a ban on light one-use plastic bags. I would like to see Mosman and the other SHOROC councils supporting the CDL
 - Targeting block of units the importance of sorting their rubbish into the correct bins.
 - Clear communication of priorities and goals. Clear communication of benefits. Meaningful and easily understood measures of success.
- Yes, a new strategy for council clean up and general waste disposal at Kimbriki
- proactive environments to ensure litter free environments
 - Pretty bins
 - As a Clifton Gardens resident, I am always appalled at the run off into the sea. I believe the Council has put in SQUIDS (is that the right acronym?) - it is always best to try and stop the waste and litter from entering the waterways where it is almost impossible to then clean up. Are there cost-effectiveness studies on some of the different strategies? Problem is cost to local council versus cost to "the globe" is hard to argue! Refunds on bottles? Stronger regulations on plastics (biodegradable) and on plastic bags (bags) and on single-use packaging? And more education on the costs and consequences of our actions.

How can we make it easier for you to reduce your waste and recycle more?

- Reducing waste isn't going to happen. Having worked on a number of these types of campaigns over the years. All sounds good in a press release. Incentives to recycle properly is the only way.
- This is hard...it depends on what type of waste each household has...we tend to have weekly newspapers & glass bottles that mount up before anything else. Bigger bins for this would be wonderful but at present it's ok. Food waste in our household tends to be packaging more than anything else...it's always been a problem and should be dealt with by the food manufacturers rather than council.
- Live in a unit and would love to have access to composting!
- Allow manly to have same scheduled council clear up days. I used to find a lot of 2nd hand things
- Supporting sites like freecycle where people can pass on their still good items rather than throwing them away. Increasing community awareness of the buy back centre at Kimbriki, and also the Eco garden
- Provide more drop off locations, for items not (normally) collected during clean up days. Example, have a dedicated location for collection of used / left over motor oils, paints and other chemicals. Currently St Ives Showground is too far and infrequent.
- Larger recycling bins Complimentary composting and worm farms Complimentary courses / articles on composting and worm farms
- Distribution of free bins.
- Offer residents recyclable shopping bags, string or cotton or jute, with receipt of Council rates
- Tell the community how. Make flyers, send them emails, have talks etc. get people excited!
- Farmers Markets that are accessible and allow for more portioned purchasing of fruit/veges/pulses etc Offer a commercial composting service Offer a plastic bag/package recycling service
- More info about what goes in what bin for recycling
- More recycling bins
- Reduce the bins at home. ie allow mixed recycling in one bin.
- Tell me what I can put in what bin- I want to do the right thing but don't always know
- Go back to regular council clean up at manly rather than this ad hoc per appointment system now under way
- Even large fast food multi-nationals, who have the power to change their packaging, thereby reducing the impact on customers' disposal waste.

- Tell me what I can put in what bin. In other councils u can recycle your pot plants. Where do I find out what is recyclable. Can I put my strawberry punnets in the yellow bin?
- Make it fun
- Uncertain
- Provide a way to recycle metals including aluminium foil. Simplify plastics categories. Maybe just accept all plastics & have them sorted professionally.
- Setting up smaller recycling stations in our local business districts - although we may be proactive about sorting at home - when we are out and about not all village CBDs have sorted recycling - note Freshwater!
- More recycle bins in public areas.
- Separate kitchen waste for weekly pickup
- For us, the only area would be composting food waste,
- I live in a unit, so a way for me to compost would be great!
- Encourage shopping centres to provide more bins for the different rubbish.
- Recycle bins in all public spaces - on streets, in shopping precincts like outdoor malls. Making a small household (indoor) style bin for easy transport without a plastic bag for recyclables.
- We already recycle a lot. But there is a lot of waste of larger items at clean ups. And we are storing some wastes, eg fluorescent bulbs, that council does not collect. There should be local drop points for these items, and for e-waste.
- make and implement effective policy to reduce use of plastic bags and all plastics that are not recyclable
- More bins
- Take away plastic bags. That way no one has a choice. Provide free compost bins!? And keep charging more for the "heavy users" of bins - I like the extra charges for the larger bins. Also helpful to provide better instructions on the recycle bins - I think many people are confused about how clean bottles need to be, lids or no lids, etc. More fines, more education, and more to catch litter in gutters so it doesn't end up on our beautiful beaches and inside marine life stomachs!
- Have smaller bins for compost and recyclable items for inside the house. Campaign for less packaging for items sold within these council areas

Do you have any other feedback?

- Keep your strategy simple. Don't try to do everything.
- I'm happy with the services of Warringah council
- Council should consider other strategies in achieving medium density housing. For example, allowing the subdivision of blocks under 1000sqm. These could be allowed for areas immediately adjacent to shopping centres, reserves, community halls and schools. Redeveloping with hi rise or lo rise units only advantages the developer, and disadvantages those properties immediately adjacent...who wants to live next to a block of flats?
- I realise I am out of area but it is a significant issue.
- Some local public bins are filthy, deterring people from using them. Especially lift up lids, if the metal bar doesn't allow bulky items easy access. Persons leave their litter where it falls.
- Promote hand washing with soap and avoid plastic bottles of anti bac wash or plastic bags wipes. The anti bacs do not kill all the bacteria and just provide a feeding substrate for resistant strains.
- No.
- I am very impressed and inspired by the work of Rob Stokes - and think we need to push towards the sustainable community vision he has been promoting in the media. Let's start by reducing needless waste and consumption.
- What happens to the general clean up collected goods - are they recycled, reused or do they go to landfill?

- Love the strategy
- No
- not sure what happens to the recycling bins in parks but they are always full of rubbish - can't we design better bins with better signage that tell people what these recyclables are used for?
- If people know that recyclables can save virgin materials then I think they would recycle more
- No
- If we don't get it right, and curb the waste, the consequences are dire for the planet that we live in.
- Like the infographic need something like this to show me how to recycle
- Bring back the twice yearly clean ups they provide the perfect opportunity to carry items out of landfill
- It's great to see a strategy put in place for our waste. It's the 21st century after all!
- Strategy once agreed needs to be implemented ASAP.
We appreciate what councils and SHOROC are trying to do, but we think that most people do not know about Kimbriki etc. Big education campaign required.
- I have a cunning plan that I would like to submit but I need more space than this. Who can I talk to about it?
- I think the Council does a great job in general, perhaps with the exception of catching litter in the water ways. More bottle and bag deposit with a small refunds are great incentives both to not litter and also to pick up litter! Showing movies like "Trashed" and "Bag it" are great - but can we get cut down / shorter versions to show at all of the schools too? Keep up the public education - the leaflets on food waste, etc, and on composting, ads in the Mosman Daily, etc. - these do make an impact I am sure.

Survey Respondent's values and details:

- A litter free environment (94%) was more important to respondents than keeping waste out of landfill (90%) or reducing, reusing, recycling (89%) or composting and worm farms (81%).
- 70% of respondents always recycle with 30% only doing it when convenient. No one did not recycle.
- 73% lived in a house, 23% in a unit
- Age group of respondents
 - <18 7.14%
 - 19-34 28.97%
 - 35-50 35.71%
 - 51-65 21.43%
 - >65 7.14%
- 62% female, 38% male

Other

18/8/14 email - hard to believe rate will be 24%, like the goal to eliminate greenhouse gases

19/8/14 web post- look to more local jobs in waste management given NDIS etc changes - look at Green Connect as case study <http://www.green-connect.com.au/> for local opportunities for learning, contribution and participation for youth, aged, marginalised and people with disabilities

20/8/14 web post - Purchasing decisions ultimately affect recycling outcomes. LG should lead by example and ensure they have a "green office" - recycling office paper and cardboard and extend right up to organics recycling arrangements in kitchens to handle food waste. This also extends to their own day to day operations and will include improved efficiency and reduced costs. This also extends to using products locally eg recycled garden products from Kimbriki in all council landscaping and rehabilitation. Also use of recycled products such as PET park benches and garbage bins. I did not see much evidence of these actions within the Too Good to Waste Strategy.

21/8/14 email - Great work on the Waste Strategy! I really enjoyed reading through it. I particularly enjoyed the infographics that were used.

9/9/14 –email - I am writing as a local resident to request that our council joins the Compost Revolution which provides composting and worm farming tutorials to residents across Australia. The program helps residents reduce their household waste by up to 50 % – saving council money and reducing landfill and lowering our carbon footprint. You can see it in action here: www.compostrevolution.com.au And there is more info for Council here: www.compostrevolution.com.au/councils. I would like to hear whether council has considered the programme and whether we can expect to get the Compost Revolution in our area soon?

Manly Daily Letter to the Editor 10 September 2014

THE Manly Daily's editorial on Saturday said, people are producing more waste and there are many reasons for this. One is the way food is supplied. So much of it is over-packaged in cardboard and plastics that it is inevitable the amount of waste continues to rise. One of the best ways to reduce food waste is to buy more fresh produce at local markets, instead of packaged food from supermarkets. Installing worm farms and compost bins are other simple ways to cut food waste.

Another reason could be levelled at the councils themselves. They do little to discourage the amount of waste residents produce.

In Pittwater, a household can buy an extra red, yellow or blue bin for \$10 a week. For the price of two large coffees you can double your total waste. If councils were serious, the biggest waste-producers should be charged more for it and hopefully this would lead to a more thoughtful approach towards waste in the process. NICK HALKYARD, Avalon Beach

end

C10.3 Pittwater Community Gardens

Meeting: **Natural Environment Committee**

Date: 3 November 2014

STRATEGY: **Community Gardens Policy and Guidelines**

ACTION: To effectively manage community gardens on public land and seek approval for adoption of the Policy and Guidelines.

PURPOSE OF REPORT

To report to Council and the community on policies and guidelines for community gardens in Pittwater.

1.0 BACKGROUND

- 1.1 The Pittwater Draft Community Gardens Policy and Guidelines were approved by Council for public exhibition on 21 July 2014. The associated report contains the background information.
- 1.2 The draft documents were placed on public exhibition for four weeks from 28 July to 25 August. During this time, the documents were exhibited on Council's website, Facebook, Twitter and at Mona Vale and Avalon Libraries and Customer Service Centres.
- 1.3 The Draft Community Gardens Policy and Guidelines were advertised in the following publications:
 - Manly Daily Mayor's Column – 26 July
 - Community Notice Board – Manly Daily 26 July and 9 August
 - About Pittwater e-newsletter - Saturday 9 August

2.0 ISSUES

- 2.1 During the exhibition period Council received four (4) submissions in response to the draft documents. The submissions are summarised below:
 - Mona Vale resident: Support for a community garden in Woolcott Reserve, Newport and hope there is enough interest for this reserve to be selected. That Council consider security – rabbits, possums and vandals.
 - Permaculture Northern Beaches: Support the proposed Guidelines and Policy. In particular, support natural or organic fertilisers, but reject the minimum lot size of 1000 square metres.
 - Clareville resident: Support community gardens and request livestock. The request for livestock is not supported due to animal welfare issues and the potential for pests and disease.
 - Resident: Wish to join a community garden group.

- 2.2 Council has received four (4) requests since 2010 by residents who wish to join a community garden group. The residents were contacted following the exhibition period to ascertain their current interest. Council received the following responses:
- Resident – contact details no longer valid.
 - Mona Vale resident August 2013 – no response.
 - Warriewood Valley resident February 2014 – would like to establish a community garden in Warriewood Valley with reference to the agricultural heritage of the location.
 - Elanora resident May 2014 – could not be contacted.
- 2.3 Refer to the Recommendation at the end of the report for suggested responses to the above issues.

3.0 SUSTAINABILITY ASSESSMENT

3.1 Supporting & Connecting our Community (Social)

- 3.1.1 Community gardens provide for social well-being and support a healthy, active and creative lifestyle.
- 3.1.2 With an increasing population and greater density, the opportunity to have 'home grown' produce is diminishing.

3.2 Valuing & Caring for our Natural Environment (Environmental)

- 3.2.1 Community gardens will not be permitted in or near bushland to ensure run-off and invasive species do not enter bushland.

3.3 Enhancing our Working & Learning (Economic)

- 3.2.2 Community gardens provide an opportunity to learn and share ideas for growing and harvesting food for consumption by the gardeners. A well designed and managed community garden will showcase best practice for other interest groups and the wider community.

3.4 Leading an Effective & Collaborative Council (Governance)

- 3.4.1 Community gardens provide opportunities for social, economic and environmental sustainability.

3.5 Integrating our Built Environment (Infrastructure)

- 3.5.1 Community gardens require low-key infrastructure initially. In the long term shedding, hot houses, solar panels and water tanks may be required.

4.0 EXECUTIVE SUMMARY

The establishment of a community garden/s has been requested by a Councillor following enquiries by the community. The Pittwater Community Gardens Policy and Guidelines have been developed to establish the process and stakeholder responsibilities to facilitate community gardens in Pittwater. Council received four (4) submissions in response to the public exhibition of the Policy and Guidelines including one resident who is interested in forming a community garden. A further two residents are interested in forming community gardens. It is recommended a workshop be held with interested residents to enable them to meet and determine whether they wish to proceed with establishing a community garden/s.

RECOMMENDATION

1. That the Pittwater Community Gardens Guidelines and Policy, as attached to the report, be adopted.
2. That a workshop be organised for all interested residents to enable them to meet, share ideas and to determine whether they have the resources to establish, fund and maintain a community garden based on the Policy and Guidelines.
3. That the workshop as outlined above, be advertised in the Manly Daily to provide the broader community with another opportunity to join a community garden group.

Report prepared by
Jenny Cronan - Landscape Architect

Mark Beharrell
MANAGER, NATURAL ENVIRONMENT AND EDUCATION

Council Policy – No	Adopted:	
	Amended:	

TITLE: COMMUNITY GARDENS POLICY

STRATEGY: RECREATIONAL MANAGEMENT

BUSINESS UNIT: RESERVES AND RECREATION

RELEVANT LEGISLATION: NIL

RELATED POLICIES: Leases over Council owned or controlled land

Objective

1. To provide a systematic process for community garden groups to apply to Council to instigate the establishment of a community gardens on Council owned land or controlled land.
2. In responding to requests for support of community garden proposals Council adheres to the Community Garden Guidelines associated with this policy.

Policy Statement

Pittwater Council provides in principle support to the development of community gardens within the Pittwater Local Government Area.

Generally, they will be confined to locations with medium to high density housing where there are limited opportunities for residents to have access to their own gardens.

Community gardens increase opportunities for local community members to work collaboratively to improve recreational and neighbourhood amenities through the establishment of community garden spaces in appropriate locations of the Local Government Area.

Details of the requirements and process for establishing community gardens are contained within the Community Gardens Guidelines.



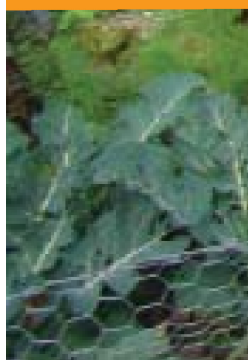
Community Gardens Guidelines



1. Introduction



A community garden is defined by the Australian City Farms and Community Gardens Network as 'an area of shared land where people come together to cultivate fresh food, to learn, relax and to meet new friends.'



The Guidelines have been developed to provide consistent management practices on how community gardens will be established and managed including stakeholder rights and responsibilities. The Guidelines will help to ensure community gardens provide a wide range of environmental, social and economic benefits.

2. Procedure for Starting a Community Garden

Establishing and developing a community garden requires forward planning and approval. The process is outlined below.

1

Applicant establishes a group of five or more members from a minimum of three households

2

Applicant discusses proposal with Council officer from the Business Unit managing the reserve

3

Applicant submits a completed Community Garden Application Form (see section 5).

4

Council selects a suitable site in consultation with the applicant.

5

Council undertakes community consultation with adjoining residents.

6

The applicant will need to demonstrate the financial viability of the community garden and ensure decision making is democratic, transparent and inclusive.

7

Application along with community feedback and draft licence is presented to the Council for approval or adoption. Written agreements / documentation completed and licence issued.

8

Construction of garden and ongoing maintenance by the community garden group and monitored by Council officers

3. Site Management Guidelines



3.1 Site Selection Criteria

Public Land

Sites suitable for community gardens under the Policy and Guidelines will be owned or managed by Council and classified as Community land under the *Local Government Act, 1993*. Community gardening on Crown land under Council's care, control and management will require approval from the Land & Property Management Authority. The activity of community gardening is considered most appropriate for land zoned RE1 Public Recreation.

In general sites for community gardens should include the following criteria:

- Identified bushland reserves or areas of natural bushland should be excluded
- Be consistent with current existing or surrounding land-use
- Be sites larger than 1,000 sqm
- Use a low level of existing park use
- Have access to water
- Have solar access and full sunlight
- Offer suitable soil profile without soil contamination
- Offer safety with good passive surveillance
- Be close to public toilets
- Involve a community consultation outcome regarding the suitability of the site
- Provide adequate parking and vehicle access
- Continue to allow safe public access across the areas occupied under licence for the community garden
- Provide other infrastructure if possible such as picnic shelters, playgrounds and community buildings
- Community gardens are not permitted on land identified as potential sites for land rationalisation.



3.2 Council's Role

- Council will provide the following:
 - A suitable site
 - A supportive role but not initiate, establish or manage community gardens
- Consistency with management responsibilities for public land under the *Local Government Act, 1993* and the *Environmental Planning and Protection Act, 2007 and Amendments 2008*
- A licence for the community garden
- Approvals for the design, construction and management of the garden.
- Advice and ongoing communication with garden coordinators and committees
- Assistance with promotion through Council's website and media releases
- A review of the community garden licence agreement and overview of compliance with guidelines and the licence.



3.3 Responsibilities of Community Gardeners

- Minimum group of five members from three or more households
- Willing to become an incorporated association
- Ensure decision making is democratic, transparent and inclusive
- Formation of a community garden group must provide an equitable measure of access and freedom for others to join the group
- Adhere to the design, construction and management practise as adopted by the Council
- Provide own tools and equipment, including hand-tools, wheelbarrows, watering cans, hoses, propagation supplies and irrigation
- Ensure any neighbouring residents are not adversely impacted by traffic, parking, noise or vermin
- Ensure the park or reserve remains accessible to the wider public
- Meet the establishment and ongoing costs of funding the garden
- Dismantle the garden if no longer required
- Pay for water usage (A meter will be placed on the tap)
- Provide a focus on sustainability, for example bush tucker and native foods

3.4 Restrictions on Gardening Methods

- Natural or organic fertilisers only
- Natural or organic methods of pest and disease control only
- Recycling and reuse of plant material
- Food produced will be used by the members of the garden for their consumption only
- Any water leaving the garden is not to be contaminated by sediment, fertiliser, manure or excessive organic matter
- No livestock or poultry are to be kept on the site

3.5 Allowable Infrastructure

- Plants include vegetables, herbs, flowers, fruit trees and edible native plants
- Plots large enough for a range of garden beds
- Raised garden beds up to 600mm high
- Imported soil from approved supplier
- Composting systems in isolated area
- Sheds, glass houses
- Rainwater tanks and irrigation
- Fencing must be a uniform style throughout the garden. Fencing may include buried wire for rabbit proof fencing and exclusion fabrics or nets to control birds and possums. Nets must not entrap wildlife
- Seating, tables and chairs



4. Regulatory Framework

4.1 Development Approvals

Public Land

Sites suitable for community gardens under the Policy and Guidelines will be owned by Council. Community gardening on Crown land under Council's care, control and management will require approval from the Land & Property Management Authority. The activity of community gardening is considered most appropriate for land zoned RE1 Public Recreation.

Community gardens may be permissible without consent under *State Environmental Planning Policy (Infrastructure) 2007*. Division 12, clause 65, details works that may be done on parks and public reserves without consent by or on behalf of a council. The community garden will also be subject to any restrictions contained in the relevant plan of management for the park or reserve.

Private Land

If a community garden is proposed on privately owned land, a development application would likely be required under the *Pittwater Local Environmental Plan 2014*.

A community garden would not be defined as horticulture unless products are cultivated for commercial purposes. Horticulture is defined in the LEP as "the cultivation of fruits, vegetables, mushrooms, nuts, cut flowers and foliage and nursery products for commercial purposes, but does not include a plant nursery, turf farming or viticulture." Horticulture is permissible in the R5, B2, B4, B7, IN2, and RE1 zones.

A community garden may best be defined as a community facility. A community facility is defined as "a building or place":

- (a) owned or controlled by a public authority or non-profit community organisation, and
- (b) used for the physical, social, cultural or intellectual development or welfare of the community, but does not include an educational establishment, hospital, retail premises, place of public worship or residential accommodation."

Community facilities are permissible in residential (R2, R3, R5, E3 and E4), business (B1, B2, B4, B6, B7), recreation zones (RE1, RE2).

Under *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*, which identifies the majority of development types that can be done as exempt (without development consent) or complying (fast-tracked approval assessed by a certifier), most general gardening activities and associated low-key infrastructure will be exempt.

A section 149 planning certificate from Council will outline what planning controls apply and whether particular parts of the Codes can be used for further development of the site. For questions regarding the permissibility of community gardens and development approvals, contact the Planning and Assessment Business Unit.

Further information on incorporating a new association is available from the following link: http://www.fairtrading.nsw.gov.au/ftw/Cooperatives_and_associations/About_associations/Before_incorporating_a_new_association.page



4.2 Incorporated Association

The community garden group is required to be an incorporated association through an application to NSW Fair Trading. An incorporated association requires annually elected office bearers and adherence to NSW Fair Trading's reporting and operational requirements. This will help to ensure group members share responsibilities equitably. An incorporated association can open bank accounts and apply for government grants.

The community garden group's office bearers are to ensure all new volunteers are aware of:

- their rights and responsibilities;
- work, health and safety regulations;
- training opportunities; and
- Council policies and guidelines.

4.2 Work, Health and Safety

- Maintain the garden beds in a tidy manner in accordance with Work, Health and Safety Regulations and acceptable aesthetics within an urban context
- Tools and sharp equipment are to be used in the correct manner and not left unattended
- Fencing and netting, if required to protect the gardens from rabbits, birds, bandicoots and possums will be uniform throughout the garden and approved by Council
- Raised beds will have no sharp edges or projections
- Compost, worm farming and fertilisers are to be stored in a screened area and in a manner that will deter vermin and unpleasant odours
- Rainwater harvesting systems will be carefully maintained to ensure water is of a high quality
- Portable tap handles will be used to ensure water is not available to the wider community

4.3 Funding

Adequate financial commitment by the community garden group is essential in determining whether Council will approve the establishment of a new community garden.

It is recommended the community garden group develop a budget to cover their operating costs including public liability insurance, construction materials, tools and equipment, water use, fencing and future improvements such as water tanks and buildings.

Most community gardens charge an initial membership fee and annual plot rental fees. For instance, the fees at a neighbouring Council's community gardens are \$50 membership fees and \$30 annual plot rentals. It is expected the community garden group will raise funds to cover their costs, supplemented by money raising activities, sponsors and grants. Expressions of interest could be invited from potential sponsors.

Refer to <http://www.ourcommunity.com.au> and <http://www.grantslink.gov.au> for further information on obtaining grants.

4.4 Insurance

The community garden group has a duty of care to members of the community who enter the site. Public Liability insurance is required for a minimum of \$20 million. Incorporated associations are able to obtain their own cover.

4.5 Licencing

The use of public land for a community garden will be subject to an annual licence. The licence is to be approved by the commercial property section of Council.

The licence could be revoked or not renewed if:

- the community garden group disbands or ceases to function
- the garden is not well maintained or becomes unsafe for public access
- noncompliance with the Community Gardens Policy and Guidelines.



4.6 Approval Process

1. Submit a Community Garden Application form to advise Council in the first instance of a community garden group's interest
2. Council to determine location of an appropriate site, Council's liaison officer to be from the relevant Business Unit within Council where the garden is proposed
3. On-site meeting with relevant Council staff to discuss the community garden proposal and meeting the relevant criteria
4. The garden location and creation of the licence agreement is to be approved by Council
5. Legal incorporation of the Community Garden group and taking out of public liability insurance.
6. Subject to receiving Council approval, preparation of a community garden plan of management by community garden members incorporating design, and setting out governance, administration OH&S and safety responsibilities and procedures for the community garden group;
7. Development of a licence agreement between Council and the incorporated community garden group for the conduct of a community garden on public land or land managed by Council. This is to be approved via the commercial property section of Council.

4.7 Dissolving a Community Garden Group

The following will lead to the dissolving of a Community garden group:

- The breach of any of the requirements of the guidelines, agreed licence or plan of management requirements may lead to the winding up of the garden
- A reduction in the number of active gardeners below the number agreed for an ongoing period longer than six months
- Any change in the land-use or land rationalisation for the greater communities benefit

4.8 Review of Community gardens

All community agreements and licencing will be reviewed on a three year basis.



5. Community Garden Application Form

5.1 Applicant's Details

Applicant's Name

Address

Phone number

Email address

5.2 Site Details (by Council)

Proposed site

Land owned by Council or under Council's care, control and management

Zoning.....

Site size (over 1,000 sqm).....

Location - density.....

Water availability.....

Solar access.....

Soil contamination.....

Possible conflicts with existing park uses.....

Safety / surveillance

Public toilets

Parking and Vehicle Access

Associated infrastructure - picnic shelter, playground, community building

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Community Consultation Outcome

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5.3 Proposal

Please attach a landscape plan showing a birds-eye view of the site to scale, including:

- initial and future areas for garden beds, utilities, seating, compost etc, water tanks and buildings;
- location of existing trees, water taps, access, on-site and off-site parking;
- proposed fencing materials and style of fencing including chicken wire or netting if required in the future – fencing to be consistent throughout the gardens;
- proposed materials for raised garden beds if required, compost bins, paths, fence posts, wire and netting etc; and
- signage

The landscape plan should provide a wish list of everything you would like and where it will go.

5.4 Financials

Please provide:

- estimated establishment costs
- proposed membership and annual fees
- proposed fund raising activities, sponsorship and grant applications

5.5 Program of works

Prioritise your works for the first year and possible future improvements into the future, for instance do you envisage a water tank, glass house or storage shed in the longer term?

[illegible]

5.6 Attachments

- Landscape plan
- Copy of public liability insurance when available
- Copy of incorporated association documentation when available

5.7 Agreement

I/we the undersigned have read Pittwater Council's Community Gardens Policy and Guidelines and agree to establish and manage the proposed gardens in accordance with these documents.

Applicant's signature.....

Date

C10.4	Adoption of Angophora Reserve Bush Fire Management Plan
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Meeting: Natural Environment Committee

Date: 3 November 2014

STRATEGY: Vegetation Management

ACTION: Implement bush fire management for Council's reserves in high priority areas

PURPOSE OF REPORT

To report to Council on the public exhibition and submissions received for the Draft Bush Fire Management Plan for Angophora Reserve, and to recommend its adoption.

1.0 BACKGROUND

- 1.1 This Bush Fire Management Plan (Plan) describes the objectives, strategies and activities for bush fire management within Angophora Reserve for the next 5 years from 2014 to 2019. This Plan will provide the framework for continued management beyond 2019 but will be reviewed at this time.
- 1.2 The aim of this Plan is to provide a framework to reduce bush fire fuel loads in a Council reserve as specified in the Vegetation Strategy of the Pittwater Council 2020 Strategic Plan.
- 1.3 The Plan addresses both the life and property protection to adjoining landowners and conservation management within a natural reserve. The Plan also provides guidance on fire prevention and fire suppression.
- 1.4 This plan has been developed in accordance with the Warringah Pittwater Bush Fire Risk Management Plan 2010 and complies with state government legislation, particularly the *Local Government Act 1993*, *Rural Fires Act 1997* and the *Threatened Species Conservation Act 1995*.
- 1.5 The Angophora Reserve Bush Fire Management Plan is comprised of two separate documents; an A1 sized Map-based Plan (to be tabled) which identifies management zones and recommended hazard reduction works for each zone as well as a proposed burn schedule which has been developed based on fire history and recommended fire intervals for each vegetation community. A supporting document (to be tabled) provides background information as well as more detailed management recommendations to complement the Map-based Plan.
- 1.6 Council at its meeting on 5 May 2014 resolved to place the Draft Angophora Reserve Bush Fire Management Plan on public exhibition for comment from Saturday 10 May until Friday 6 June 2014. A public meeting was held on Wednesday 28 May 2014. Following this meeting changes were made to the Map-based Plan. The public exhibition period for this document was then extended by 4 weeks until Friday 4 July with submissions received up until 18 July 2014.

2.0 ISSUES

- 2.1 The plan identifies works that will be required to lower the bush fire risk within Angophora Reserve through the implementation of sustainable bush fire management practices.

2.2 Community Consultation

The following community engagement methods were undertaken;

- Letter to residents adjoining Angophora Reserve advising of the draft Plan on exhibition and public meeting to be held.
- Advertised on Councils website and in the "Cooee" newsletter.
- Email notification sent to Councillors and the Natural Environment Reference Group.
- Public meeting held on Wednesday 28 May 2014.

Hard copies of the Draft Plan were available for viewing during the exhibition period at Pittwater Council's Customer Service Centres and Libraries at 1 Park Street, Mona Vale and 59A Old Barrenjoey Road, Avalon Beach.

Approximately 29 local residents attended the public meeting. Mark Beharrell (Natural Environment & Education Manager, Pittwater Council), Matthew Hansen (Pittwater Council) and Inspector George Sheppard (Warringah Pittwater Deputy Fire Control Officer & Community Safety Officer, NSW Rural Fire Service) presented at this meeting. Meeting minutes are available on Councils Community Consultation webpage.

2.3 Submissions Received / Assessment of Issues Raised

Following the public exhibition of the Draft Angophora Reserve Bush Fire Management, nine (9) submissions from local residents and two (2) submissions from local community groups; Avalon Preservation Trust and Clareville and Bilgola Plateau Residents Association (CABPRA) were received.

Submissions covered the following themes and issues;

1. Asset Protection Zones (APZs)

4 submissions were received highlighting the following issues;

- Will the APZ shown on private property affect proposed/future development?
- Why does the extent of the APZ on Council land differ between properties?
- Shouldn't the APZ be provided solely within in the Reserve?
- Why doesn't Council apply the 10/50 distances in the Reserve?
- Will council remove all trees and vegetation within nominated APZ/Defendable Space areas?

Council's response

Following the Public Meeting, the Map-based Plan was amended to remove the APZ shown on private property. There has been confusion generated by the use of the term Asset Protection Zone within the Plan, this will now be known as Defendable Space.

- This Plan will not change the current requirements of a development application as bush fire management requirements are accounted for under Pittwater's Development Control Plan which are consistent with the requirements of the NSW Rural Fire Service document *Planning for Bushfire Protection 2006*.
- Council will maintain currently existing areas of Defendable Space and up to 20 metres from the rear of dwellings for existing development on private property. The extents differ as Defendable Space cannot be provided on slopes over 18 degrees, therefore less than 20 metres is shown in some areas.

- An APZ is not provided solely within the Reserve as Council is neither required nor responsible for the provision of an APZ / Defendable Space on their land to meet the requirements of *Australian Standard 3959- 2009 - Construction of buildings in bushfire prone areas* on private property.
- The new laws regarding the NSW 10/50 Vegetation Clearing Code of Practice provide for landowners to undertake works on their own property if they wish, it is an entitlement not an obligation. It does not apply to public lands or lands set aside for conservation. The assistant commissioner of the NSW Rural Fire Service (RFS) has indicated that these areas will be assessed as required on a risk management approach based on RFS guidelines and expert knowledge.
- Defendable Space areas are not necessarily mown land areas and may consist of maintained vegetation. Not all trees and vegetation must be removed. Council will maintain Defendable Space in line with the *NSW RFS Standards for Asset Protection Zones 2005* and RFS advice.

2. Other issues raised

1 submission was received highlighting the following issue;

- There is confusion regarding the identified 'extreme' Bush Fire Hazard Risk rating and a statement on Page 32 of the supporting document?
- The 25 year fire interval for Wet Sclerophyll Forest vegetation should be reduced to provide better property protection.

Council's response

- The bush fire risk rating detailed in section 1.6 was identified for Angophora Reserve in the Warringah Pittwater Bush Fire Risk Management Plan (2010). Council acknowledges the statement on Page 32 "*fires starting within the reserve are unlikely to develop into major fires because of the small area to which they are confined*" creates confusion, therefore this statement has been removed from the Plan.
- The 25 year interval for prescribed burning of the Wet Sclerophyll Forest is based on Keith's vegetation classification. Following further inspection of this community, this vegetation community has been changed from Northern Hinterland Wet Sclerophyll Forests to Southern Lowlands Wet Sclerophyll Forest and a fire interval of 10 years has been applied.

3. Issues to be addressed by the district Rural Fire Service

2 submissions were received highlighting issues relating to specific vegetation adjoining private property posing a potential fire risk.

Council's response

- These submissions have been referred to the district RFS for inspection. If the RFS consider there to be a hazard they will provide a set of actions, Council will then act on their advice.

4. Queries and suggested changes to the Map-based Plan and supporting document

5 submissions were received highlighting, but not limited to, the following issues;

- A disclaimer should be included on the Map-based Plan and Supporting document in the event where external events mean actions can't be undertaken.
- The plan should reference the Pittwater Bush Fire Prone Land Map.
- Suggested changes to Fire Management Zones were received. Can priority be given to SFAZ3 for hazard reduction burning?

- Clear statutory roles for each fire agency should be highlighted.
- The objectives should be revised.
- Northern Hinterland Wet Sclerophyll Forest should be changed to Southern Lowlands Wet Sclerophyll Forest.
- Reference to catastrophic fires should be included.
- Why are rural concepts being applied to an urban bushland reserve?
- This plan contains some historical information taken from the Angophora Reserve Plan of Management 2002 which is over 12 years old and describes conditions that existed at that time.
- Concerns were raised regarding regeneration works undertaken in APZ/Defendable Space areas.

Council's response

Detailed submissions were received regarding queries and changes to the Plan. Although all comments and suggested changes were considered, some were outside the scope of this plan and should be considered in the review of the Warringah Pittwater Bush Fire Risk Management Plan. One submission raised concerns in relation to relevant NSW Rural Fire Service legislation, which is also outside the scope of this Plan. This submission was referred to the Warringah Pittwater District Office of Rural Fire Service for further comment.

- A disclaimer has been included at the beginning of the Supporting Document and on the Map-based Plan.
- A section on Pittwater's Development Control Plan in relation to Bush Fire Prone Land has been included.
- Changes to the burn schedule for fire management zones including SFAZ 3 have been made based on changes to the Map-based Plan and fire intervals.
- A section on the statutory roles of Fire and Rescue NSW and the NSW Rural Fire Service has been included.
- The objectives of the Plan have been amended to include only four main objectives.
- Northern Hinterland Wet Sclerophyll Forests has been changed to Southern Lowlands Wet Sclerophyll Forest and a minimum fire interval of 10 years applied for Strategic Fire Advantage Zones.
- The Plan recognises that on days of catastrophic fire danger, bush fires are unlikely to be manageable and no adjoining properties would be defendable.
- Council also has concerns applying 'rural concepts' in relation to RFS bush fire codes and guidelines in urban areas where they may not be appropriate, however this is state legislation which Council must comply with.
- Historical information has been reviewed to ensure it is relevant to the current state of the Reserve.
- There are areas of encroachment within the Reserve which extend far beyond the necessary Defendable Space requirements. Defendable Space is not just mown land areas and may consist of maintained vegetation.
- Minor errors pointed out including typos and grammatical errors within the Plan have been noted and amended.

A detailed response has been provided to the writer of each submission. **Attachment 1** provides submissions and Council's response. Submissions have been summarised where appropriate to highlight/address key concerns. Council has made every attempt to cover key issues raised by all submissions.

As detailed above, several changes have been made to the Map-based Plan and Supporting document. In particular, reference to Asset Protection Zones within the Reserve has been replaced with 'Defendable Space' to reduce confusion regarding APZ requirements on private land under the Pittwater 21 Development Control Plan and APZs or Defendable Space provided on Council land.

2.4 Government Agency Input

Natural Environment and Education staff liaised with the NSW Rural Fire Service (Warringah Pittwater Office), Fire and Rescue NSW and the Aboriginal Heritage Office to ensure the proposed management actions are achievable and align with the bush fire management strategies and principles of these organisations.

The plan will be put to the Warringah Pittwater Bush Fire Management Committee to be endorsed following adoption by Council.

2.5 10/50 Vegetation Clearing Code of Practice

This is a separate issue to the adoption of the Angophora Reserve Bushfire Management Plan. Council is currently seeking changes to this Code including a reassessment of the categorisation of bushland reserves.

3.0 SUSTAINABILITY ASSESSMENT

3.1 Supporting & Connecting our Community (Social)

3.1.1 The development of the Angophora Reserve Bush Fire Management Plan is to reduce the bush fire risk to people and property adjacent to the Reserve.

3.2 Valuing & Caring for our Natural Environment (Environmental)

3.2.1 The development of the plan is to ensure the environment is incorporated in risk management of bush fires. Understanding how bush fires interact with the natural environment is an integral part of the process. Proposed mosaic burning can be used to manage risk within the Reserve to different vegetation types and vegetation communities (particularly endangered ecological communities), threatened species, water quality etc.

3.3 Enhancing our Working & Learning (Economic)

3.3.1 One of the key outcomes of the NSW Government policies relating to natural hazards is the 'protection of public and private infrastructure and assets'. By ensuring there are adequate management strategies in place to deal with natural hazards such as bush fire, this will allow for the resourcing of these actions.

3.3.2 As a minimum we spend \$30K p.a. in Angophora Reserve. This is mostly spent on; maintenance of APZs, track and entrance maintenance and some bush regeneration. Works are supported by the Angophora Bushcare group who undertake bush regeneration and creekline maintenance.

3.4 Leading an Effective & Collaborative Council (Governance)

3.4.1 The plan provides management of a community asset by consultation with the local community and other stakeholders. The recommended refinements as a result of public feedback will improve the protection of assets, that being the Reserve and the adjacent properties.

3.5 Integrating our Built Environment (Infrastructure)

3.5.1 As Angophora Reserve interfaces with residential zones, management actions and recommendations can align with the Pittwater DCP and help to protect built assets and property from bush fire.

4.0 EXECUTIVE SUMMARY

- 4.1 The Bush Fire Management Plan for Angophora Reserve identifies works that will be required to lower the risk of bush fire within the Reserve through the implementation of sustainable bush fire management practices including appropriate hazard reduction works.

RECOMMENDATION

That the Angophora Reserve Bush Fire Management Plan as amended and tabled be adopted.

Report prepared by
Kim Macqueen – Natural Environment Officer

Mark Beharrell
MANAGER, NATURAL ENVIRONMENT & EDUCATION

Review of Submissions

Submissions have been separated into the following themes and issues;

1. Asset Protection Zones
2. Other issues raised
3. Issues to be addressed by the district Rural Fire Service
4. Queries and suggested changes to the Map-based Plan and supporting document

1. Asset Protection Zones**Submission 1**

The Asset protection zone (APZ) proposed extends to my front door. My approved plan for a renovation calls for an extension of approximately 7.5 meters into this APZ. I believe the instalment of an APZ over my property will preclude my renovations (as that buffer zone will be reduced), reduce the utility of my property and cause a decrease in the value of my property.

By installing the APZ as close to houses as possible it reduces the size of any APZ required in the reserve. This reduces the cost to council of managing the APZ and it reduces the need for vegetation reduction in the reserve and thereby increases my fire risk.

This policy is discriminative for people who have not renovated their house or have already maximised their own APZ by setting back their house. On some properties the APZ extends only a couple of metres, on others it is closer to 20 metres. This minimises the size of the APZ that the council has to maintain. A more logical APZ would've extended a set distance into each property.

Relevant sections: Map-based Plan (Version 1)

Response

Following the Public Meeting held on 28 May 2014, the Map-based Plan was amended to remove the APZ shown on private property. There has been confusion generated by the use of the term Asset Protection Zone within the Plan, this will now be known as Defendable Space.

Within the Reserve, Council will maintain existing areas of Defendable Space up to 20 metres from the rear of dwellings where an Asset Protection Zone cannot be met for existing development on private property. Along Bilwara Avenue, Defendable Space will be provided to the top of escarpment edge this could be up to 30 metres from the rear of existing dwellings. As Defendable Space cannot be provided on slopes over 18 degrees, less than 20 metres is shown in some areas. Outside of the Defendable Space areas, Council will manage fuels using a mosaic fire regime and where necessary manual hazard reduction to reduce the impacts of a potential wildfire.

This Plan will not impact on any current approved development application. Your approved renovation will have already accounted for bush fire management requirements under Pittwater's Development Control Plan which will be consistent with the requirements of the NSW Rural Fire Service document *Planning for Bushfire Protection 2006*.

Submission 2

If a catastrophically dangerous potential exists, as part of a natural asset management program why doesn't Pittwater Council or the Rural Fire Service clear a fire break within the Reserve, rather than putting the responsibility onto home owners who are least capable of managing this?

A fire break would be of great benefit in the event of fire, slowing the fire spread close to homes, providing a buffer zone lowering heat spread, allowing better fire fighter access and access for Sydney Water to maintain their sewerage pipes in the Reserve.

There is significant potential for loss of life and property, not to mention litigation exposure.

Under the proposed "People before Trees" legislation, I believe 10 metres, including trees, should be cleared from property boundaries and 50 metres for vegetation and shrub removal. Would this work be done by Pittwater Council or the RFS or home owners?

Relevant sections: 1.4

Response

A land management agency (e.g. Council) or private land owners have a duty to minimise the danger of the spread of bush fire on or from their land. This is the intention of this Plan; for Council to improve maintenance, carry out manual fuel reduction works and undertake mosaic hazard reduction burning within the Reserve.

Land management agencies are neither required nor responsible for the provision of a "fire break" or Asset Protection Zones / Defendable Space on their land to meet the requirements of *Australian Standard 3959- 2009 - Construction of buildings in bushfire prone areas* on private property. As mentioned above, there has been confusion generated by the use of the term Asset Protection Zone within the Plan, this will now be known as Defendable Space.

As mentioned above, Council will maintain existing areas of Defendable Space as shown on the revised Map-based Plan. Outside of the Defendable Space areas, Council will manage fuels using a mosaic fire regime and where necessary manual hazard reduction.

Mike Baird's comments "People before Trees" relates to the *10/50 Vegetation Clearing Code of Practice* certified by the RFS Commissioner which allows clearing by property owners to manage perceived risk on their own land. The recently announced 10/50 legislation, this allows for the removal of trees within 10 metres of a habitable dwelling and vegetation under 3m within 50 metres of the dwelling, this only relates to private property. It does not apply to public lands or lands set aside for conservation. All hazard reduction works to occur within Angophora Reserve can only be undertaken by Council.

Submission 3

Chapter 4 of the Planning for Bushfire Protection document 2006 makes it clear that an APZ is a SEPARATION DISTANCE and the need for it (arising from vegetation in adjoining Angophora Reserve) does limit subdivision on land that might have been subdividable otherwise, and yes it does prevent a landowner from extending his/her dwelling or building a new home with a new footprint encroaching into that separation distance. I don't think people generally understand this concept.

Part of the new planning reforms were to try and get people to think strategically about development, and documents like this need to help people to understand future implications of development and constraints. We are unclear how the draft management plan for Angophora Reserve will impact on the development potential of adjoining properties, and in what circumstances. I don't think it's a good idea to try and separate out the planning for the Reserve, and its management, from impacts on adjoining private land.

Council's Draft Plan should ensure that the APZ is provided ON THE RESERVE or as an alternative, possibly preferable, negotiate with residents that the APZ should be equally shared between the Council and the adjoining landowner, the community enjoying mutual benefit with the adjoining land owner in having that vegetation there, but also SHARING the responsibility of managing the risk.

The situation needs to be clear so that all landowners are properly informed and fully cognisant of what is happening in terms of the Draft Plan for Angophora Reserve. The jargon i.e. references to other documents and the Planning Act, need to be put aside, and replaced by clear fact sheets, possibly with diagrams which show what will happen in case of house extensions, or new homes. Dealing only with the existing development now and leaving future development to controls in other documents, tends to mislead people who will then be unhappy in the future.

Many of the adjoining landowners may want to extend into their houses into rear yards in future, or replace their dwellings, and will be either constrained or in fact prevented from doing so because of the restrictions being adopted as part of the Draft Plan. Why is the Council so unwilling to give people proper information in this case?

Could you please advise us of the standard wording relating to bush fire protection on one of the 149 Certificates typical of properties adjacent to the Reserve?

Response

The Plan is to manage the current risk, not risk to any future development. New development will be assessed as part of that development application process. Any development application will need to meet the "in-fill" requirements of *Planning for Bush Fire Protection 2006*.

As previously suggested the onus for Asset Protection Zones generally cannot be placed on an adjoining land owner. Development can still occur provided the requirements of *Australian Standard 3959- 2009 - Construction of buildings in bushfire prone areas* is met in accordance with the determined Bushfire Attack Level, this is currently the situation for properties adjoining the Reserve.

As mentioned previously, there has been confusion generated by the use of the term Asset Protection Zone within the Plan, this will now be known as Defendable Space. It must be noted, that land management agencies are neither required nor responsible for the provision of Defendable Space on their land to meet the requirements of *Planning for Bush Fire Protection 2006* on private property in bushfire prone areas. Nonetheless, Council will maintain existing areas of Defendable Space up to 20 metres within the Reserve where it cannot be met by existing development as well as providing Defendable Space to the top of the escarpment edge along Bilwara Avenue. It must be noted that Defendable Space cannot be provided on slopes over 18 degrees. Outside of these areas of Defendable Space, Council will manage fuels using a mosaic fire regime and where necessary manual hazard reduction to reduce the impacts of a potential wildfire. Areas of Defendable Space have been established in consultation with the district Rural Fire Service.

For new development on properties adjacent to Angophora Reserve nothing changes from the current situation, all property owners on bushfire prone land were notified when the bush fire prone land mapping was revised in 2012 and this relates directly to the requirements of *Planning for Bush Fire Protection 2006*. Anyone purchasing a property since would have received a S149 certificate which would have included the relevant notification, refer to Attachment 1a.

Once again the draft Angophora Reserve Bush Fire Management Plan relates to Councils management of the Reserve, in particular; maintenance of the current situation in terms of mosaic burning and provision of defendable space, whilst seeking to retain the conservation values of the Reserve.

Submission 4

We would recommend more residential consultation specifically in reference to applying regulation design for rural applications.

The question about applicability of rural legislation in urban areas is in response to comments and questions in the minutes from the meeting on the 28 May 2014:

“APZ calculations for Angophora Reserve as identified in Planning for Bush Fire Protection (2006) could require an APZ of approximately 60 metres for majority of these houses. We can only remove the risk by removing the bushland. As the community values the natural area, this is not an option. Defendable space needs to be created to allow no loss of life due to wild fire. The key focus of an APZ is on life and allows a person to defend their property.

Q. Why doesn't Council clear 100 metres of bushland to reduce the risk?

A. The reserve is set aside as a bushland reserve, and contains a diversity of flora and fauna. Council would struggle to get environmental approval to clear such a large area of vegetation. The general community also value the natural heritage of the site. The bushland is covered under state legislation such as the Threatened Species Act 1995.”

The contradictory statement about not clearing trees and bushland in the APZs on council land will cause endless amounts of confusion and animosity in the community. The council should not cherry picks rules / legislation (rural / urban views)? The APZs should be in or out of the plan / maps. If they are in, then the community should anticipate the council removing the bushland and trees as implied on the maps and in the plan. Could you provide clarification if council will clear all bushland and trees in the nominated Asset Protection Zones (on council land)?

The council should seek the required environmental approvals prior to finalising the plan or remove the APZs from the plan and maps. Consequently the regulatory powers will formally define the risk balance between the environmental protection of urban reserve bushland and the need for rural bush fire risk mitigation regulation.

Response

Although Council agrees there are issues with applying rural legislation to urban areas particularly in regards to Asset Protection Zones, this is outside the scope of this Plan. The NSW Rural Fires Service (RFS) legislation is generic and does not address site specific issues. Developing site specific bush fire management plans such as this, is one of several Bush Fire Management Committee wide treatments identified in the Warringah Pittwater Bush Fire Risk Management Plan developed in accordance with the *Rural Fire Act 1997*. This Plan aims to find a balance between environmental protection and reducing the bush fire risk to life and property.

As mentioned, to avoid confusion generated by the use of the term Asset Protection Zone (APZ) within the Plan, it will now be referred to as Defendable Space. Defendable Space shown on the Map-based Plan is already well maintained with reduced fuel and mown areas. Council will maintain remaining fuel loads in line with the *NSW RFS Standards for Asset Protection Zones 2005*. Defendable Space has been established in consultation with the district Rural Fire Service.

Land management agencies (i.e. Council) are neither required nor responsible for the provision of APZs on their land to meet the requirements of Planning for Bush Fire Protection 2006 on private property. Council will maintain existing areas of Defendable Space up to 20 metres from the rear of dwellings where an Asset Protection Zone cannot be met for existing development on private property. As Defendable Space cannot be provided on slopes over 18 degrees, less than 20 metres is shown in some areas. Within the Reserve itself, Council will manage fuels using a mosaic fire regime and where necessary manual hazard reduction to reduce the impacts of a potential wildfire.

2. Other Issues Raised

Submission 5 (a)

We note on page 2, the rating for this reserve is as follows; Bush fire hazard risk: Extreme, Likelihood: Likely, Consequence: Catastrophic. We have difficulty reconciling this with the statement on Page 31 that "fires starting within the reserve are unlikely to develop into major fires because of the small area to which they are confined". They may not be major fires on a state wide scale but we believe potentially disastrous (catastrophic) on a local scale.

We noted a comment at the recent public meeting that nothing can be done with a catastrophic fire but we would argue that the whole focus of this plan should be on trying to remove the possibility of such a fire. We therefore question the 25 year interval for prescribed burning in some areas where we believe fuel loads will be very heavy. On a 40 degree day with 12% humidity and an 80 kph westerly the whole reserve and surrounding lives and property will be put at risk.

We further note the statement on Page 32 that "information is lacking on Pittwater Spotted Gum EEC of the lower slopes" and "however the moister conditions indicate a rather longer period between fires, since only the hottest fires are likely to penetrate." In our experience, including bushcare activities, most of this area cannot be regarded as moist for most of the year, and is mostly "bone dry" in summer. When information is lacking we urge the return of a weighting in favour of the protection of lives and property by a reduction in this 25 year interval.

Relevant sections: 1.6, Appendix 1

Response

The bush fire risk rating detailed in section 1.6 was identified for Angophora Reserve in the Warringah Pittwater Bush Fire Risk Management Plan (2010). This rating is based on an assessment of risk to adjoining residential properties (i.e. human settlement) and environmental assets. The bush fire hazard risk is determined based on a combination of 'consequence' - the outcome or impact of a bush fire event and 'likelihood' - the chance of a fire igniting and spreading. Once the likelihood and consequence have been entered into the risk register for an asset (i.e. Angophora Reserve), the risk level is automatically determined.

The consequence of a bush fire impacting this asset is considered 'catastrophic', this rating considers vegetation type, slope and separation distance. It also considers not only the threat to adjoining homes but also the threat to endangered ecological communities and aboriginal heritage in the Reserve. The likelihood of fire occurring was considered 'likely' this rating considers; fire history, including ignition cause and patterns, known fire paths, access, containment potential and potential fire run (size of fire run). This is explained in detail in the *RFS Bush Fire Risk Management Planning Guidelines for Bush Fire Management Committee (Policy No. 1/2008)*.

Council acknowledges the following statement "fires starting within the reserve are unlikely to develop into major fires because of the small area to which they are confined" creates confusion, therefore this statement has been removed from the Plan. This sentence was in relation to fire behaviour and the shape and size of the reserve. An intense fire needs time and space to build up momentum for the fire to spread from the ground layer into the elevated fuel layers and into the canopy. Within smaller reserves there is less space for an intense fire to establish.

The 25 year interval for prescribed burning of the Wet Sclerophyll Forest is based on Keith's vegetation classification. Following further inspection of this community, this vegetation community has been changed from Northern Hinterland Wet Sclerophyll Forests to Southern Lowlands Wet Sclerophyll Forest which has a fire interval of 10 years. This is consistent with the minimum fire interval for this community as detailed in the *NSW Bush Fire Environmental Assessment Code 2006*. The proposed burn schedule will be amended for burning to occur in this vegetation community within the life of this Plan. It must be noted that the schedule allows a 3 year window for hazard reduction burns as they are often postpone due to; inappropriate weather conditions and necessary adjustments to the burn schedule following wildfire.

3. Issues to be addressed by the District Rural Fire Service

Submission 6

6 Bilwara Avenue occurs on the southern boundary, opposite APZ 1. The rear garden is free of fire hazards. Concern is for the potential threat caused by 2 – 3 large eucalypts trees adjoining the north-western boundary. The concern is that these trees will become a major threat to their home in the event of a fire. Removal of these trees would substantially decrease the fire hazard to 6 and 8 Bilwara Avenue.

A tree application was approved in 2007 for 1 x Angophora in this location to be pruned with Council consent. Council approval for additional thinning of these trees has been requested.

Submission 7

There is a lot of dead wood and fallen trees on reserve land very near 16 Bilwara Avenue, the result, I believe, of a fire hazard reduction some years ago. I believe this wood constitutes a fire hazard and should be removed.

A second serious risk to my home is the cluster of tea trees which are growing on reserve land just beyond the boundary of my property and the property next door on the low side (only 2-3 metres from my house). Tea trees are highly flammable and I fear could act as a 'wick', leading fire up to my house in the event of the bushland below being ignited. My house has exposed cedar beams and window frames, as well as pine decks which make it particularly vulnerable to fire and ember attack, unlike the adjacent dwellings with their solid brick construction and concrete patios. I would request that these tea trees be removed as a matter of urgency.

Relevant sections: 4.1.2

Response (to submission 6 & 7)

Two residents brought attention to the potential fire hazard of adjoining vegetation; these submissions have been referred to the district Rural Fire Service (RFS) for inspection. The district RFS will inspect the mentioned trees/vegetation to determine the potential fire hazard. If the RFS consider there to be a hazard, Council will act on their advice. Council will keep the residents informed of the progress of the complaint with the district RFS. Council's Tree Preservation Officer will also inspect these trees to ensure pruning is undertaken in accordance with *DCP Control B.4.22 Preservation of Trees or Bushland Vegetation*.

It should be noted that larger trees can remain within an APZ or Defendable Space provided;

- No part of their crown occurs within 5 m of any building (significant habitat trees can remain 2 m out from the building line);
- Canopies are discontinuous, that is canopies are separated by at least 2 m;
- They are smoothed barked species or, if rough barked, are maintained free of hanging bark and other ladder fuels;
- Low branches holding fine fuel (i.e. leaves and twigs of <6mm in diameter) are pruned to 2 m from the ground;

Trees map help reduce potential ember rain and allow fire officers to approach any fire front by giving protection from radiant heat

4. Queries and suggested changes to the Map-based Plan and supporting document

Submission 5 (b)

We suggest that the scheduled dates for each zone be shown on the Plan as well as in the supporting document.

SFAZ 1 - This zone is not planned for prescribed burning until after 2029 which we regard as far too long (see the comments above). There is also a continual very heavy build-up of flammable Cabbage Tree Palm fronds in this area. Reference is sometimes made to pile burning but what has happened in the past is we have had the piles without the burning, thus leaving dangerous piles for an arsonist.

SFAZ 2 - The Plan states "consider " prescribe burning in 2014 but the supporting document shows 2015, 2016, 2017. As it is now 10 years since the last control burning we request this zone be confirmed for 2014, 2015 and 2016.

LMZ 2 - This is a very large and potentially hazardous area in a wildfire. Would it be feasible to extend SFAZ 4 and SFAZ 7 to break LMZ 2 into two areas thereby reducing the risk of a wildfire moving up the slope?

Some of the access points shown on page 4 for maintenance access are not currently accessible either for maintenance or for emergency access.

Relevant sections: 4.3, Map-based Plan

Response

The proposed year for each burn is already shown on the Map-based Plan as well as in the Supporting Document. A burn will now be scheduled in SFAZ 1 between 2017 and 2019 and manual hazard reduction will be undertaken to reduce palm fronds. Mention was made of piles being created in this zone in the past but never burnt. Small compostable piles are now created where burning of piles is not easily accessible to avoid further potential hazards.

You requested that SFAZ 2 be burnt between 2014 and 2016. The Map-based Plan says to "consider burning the Dry Pittwater Spotted Gum Forest in 2014+". SFAZ 10 and SFAZ 11 (previously SFAZ 8 and 9) are proposed for burning between 2014 and 2016. The burn schedule has been prioritised based on; recommended fire intervals, priority for areas with highest fuel loads, mosaic burning to retain habitat (no two adjacent zones should be burnt within the same or consecutive years) and occurrence of wildfire. Also, it is unlikely that more than one burn within a reserve would be undertaken by Fire and Rescue NSW in the one year.

LMZ 2 contains Littoral Rainforest endangered ecological community. The Littoral Rainforest EEC will now be mapped as a separate Fire Exclusion zones with some manual works planned to remove weed fuel along the reserve boundary. The north western slope of LMZ 2 will be included in SFAZ 11 (previously SFAZ 9) to reduce the area of this zone.

Please note, all access points shown on the Map-based Plan will be re-established and maintained to allow access into the Reserve.

Submission 8

Can priority be given to the proposed measures for SFAZ 3 as this area has had no attention since the small burn in 1996. The remainder of the area is a high hazard for neighbouring residences.

Response

The proposed burn schedule for SFAZ 3, behind Ruskin Rowe and Palmgrove Road, was based on a fire interval of 25 years for prescribed burning of the Northern Hinterland Wet Sclerophyll Forest. Upon further inspection, this vegetation is now considered Southern Lowlands Wet Sclerophyll Forest which has a minimum fire interval of 10 years as detailed in the NSW Bush Fire Environmental Assessment Code 2006.

The proposed burn schedule has been amended; a burn is to occur within the whole of SFAZ 3 between 2015 and 2017. The schedule allows a 3 year window for burning as hazard reduction burns are often postpone due to inappropriate weather conditions. It must be noted that the proposed burn schedule has been developed so that; areas of highest fuels loads take priority and no two adjacent zones are burnt within the same or consecutive years. Adjustment to the burn schedule following wildfire may be required. In the meantime, manual hazard reduction works and pile burning will be undertaken in this area and Defendable Space of approximately 6 metres from the rear of boundary fences will be maintained.

Submission 9

Suggested Changes	Relevant Section	Amended / Comment noted
At beginning of document make clear Statutory roles, which agencies are responsible for implementing strategies e.g. Rural Fire Service and Fire and Rescue NSW - memorandum of understanding? Make clear arrangements between Pittwater Council and other agencies.	1.1	Amended. Refer to Section 1.7
3 Objectives preferable, 8 seems repetitive; 1. Protect Life and Property in and adjacent to the reserve from bush fires 2. Protect Natural and Cultural Heritage values of the reserve 3. Engage with Community and Fire Authorities in managing fire within the reserve 4-8 are Strategies, not objectives	1.1	Amended. There are now 4 objectives.
<i>"The objective of this plan is to effectively manage the availability of fuel to a level that reduces the impact of a wildfire."</i> - [not just fuel] replace with bush fire risk. (includes assets, maintenance of properties, buildings)	1.6	Amended in line with the BFRMP.
<i>"The BFRMP identifies broad bush fire management zones to determine the fire management intent for a specific area"</i> - Angophora Reserve and surrounding residential areas sit within an identified Bush Fire Prone Area, so the BFRMP therefore identifies...	1.6	Noted. No change considered necessary. Pittwater's Bush Fire Prone Land map is now detail in section 1.8.
Figure 1 - Key unclear / Maps unclear, used 2010 district BFRMP, has this map been refined? For the 2014 map? Pittwater & Warringah Councils BFRMP need to clearly connect both plans statements (& seek Committees endorsement). Why isn't Red Line all around map	2.1, Figure 1	Noted. Figure 1 is a location map and not related to the BFRMP.
<i>"Northern Hinterland Wet Sclerophyll Forests (PSGF EEC)"</i> – this should be Southern Lowlands Wet Sclerophyll Forest (WSF). Re-visit Methodology used here, particularly Threshold. See P.310 Keith, Pittwater Spotted Gum Forest eq.	3.2, Table 2	Amended. Vegetation community changed to Southern Lowlands WSF.

Suggested Changes	Relevant Section	Amended / Comment noted
<i>"The fire management strategies identified in this Plan aim to limit the availability of fine fuels and subsequently, fire intensity"</i> – include "within APZ's" at the end of the sentence.	4	Noted. No change considered necessary.
Include and bring to communities attention – Fires burning under catastrophic conditions are not manageable regardless of strategies in place.	4	Amended. Sentence added. See section 4.
<i>"Aboriginal heritage issues should also be discussed prior to the commencement of a burn on the day with the appropriate fire agency i.e. Fire and Rescue NSW or NSW Rural Fire Service."</i> - And talk to Metropolitan Local Aboriginal Land Council (MLALC) regarding works access, clear fuel around caves, burials & art in cave, care to limit public access to caves.	4.2.5	Noted. No change considered necessary. The AHO is in direct contact with the MLALC.

Response

Council has considered these suggested changes in the final draft Plan. In particular the following changes have been made;

- A section on the statutory roles of Fire and Rescue NSW and the NSW Rural Fire Service has been included.
- The objectives of the Plan have been amended to include only four main objectives.
- Northern Hinterland Wet Sclerophyll Forests has been changed to Southern Lowlands Wet Sclerophyll Forest and a minimum fire interval of 10 years applied for Strategic Fire Advantage Zones.
- The Plan recognises that on days of catastrophic fire danger, bush fires are unlikely to be manageable and no adjoining properties would be defensible.

Submission 10

Suggest Changes	Relevant Section	Amended / Noted
Consider whether the fire exclusion area (i.e. littoral rainforest area) should be mapped as a zone in its own right (i.e. FEZ), rather than as a layer of the LMZ. There is provision for this under the BFCC policy and BFMP model guidelines.	Map-based Plan	Amended. All Littoral Rainforest has been mapped as a Fire Exclusion Zones.
Consider making a distinction between "Fire Management Zones" and "Fire Management Units", to avoid confusion.	Map-based Plan	Noted. Change not considered necessary.
It would be useful to acknowledge the role that local resident groups can play in assisting Council with manual hazard reduction, particularly if Council has a policy and standard consent for works which protect reserve values and avoid dumping of rubbish, compost heaps and encroaching furniture, gardens and parking spaces for vehicles, caravans, boats etc. Council could provide gloves, hand tools and training in conjunction with RFS. Council should try to rationalise the work that is currently done on reserve boundaries, some of which is very helpful, and some of which is not.	4.2.1, Map-based Plan	Noted. There is currently a bushcare group (18 volunteers) that meet once a month. This group has been undertaking works in the Reserve over the last 5 years. These works are coordinated with the hazard reduction contract in the Reserve. Council will encourage neighbouring resident to be involved in this group.

Suggested Changes	Relevant Section	Amended / Comment noted
<p><i>Regarding the 10/50 Rule</i> - The use of a 20 metre APZ width from the building line is rather arbitrary, but understandable, given that if the guidelines under <i>Planning for Bushfire Protection</i> (PBP) were otherwise applied; the width of the APZ may impose an unreasonable burden on limited Council resources. I do understand that Council needs to balance competing priorities for this important reserve; however the approach is not based on a best practice risk management approach. To better address this issue, Council might consider applying the guidelines of PBP and seeking to divide the APZ into an inner (20m) and outer protection units with different standards and rotational periods applying to both. This would address some of the concerns (albeit ill-informed) at the Council meeting. The combined 'APZ / SFAZ' management units to be a little confusing, and will make consistent reporting on performance by zone, a little difficult.</p>	Map-based Plan	<p>Noted. The term Asset Protection Zone within the Plan is now known as Defendable Space. Council will maintain existing areas of Defendable Space. APZ/SFAZ as shown on the revised Map-based Plan.</p> <p>The APZ / SFAZ management units have now been changed to SFAZ only.</p>
<p>Is pile burning (a form of prescribed burning) of weeds permitted in LMZ2? This perhaps should be clarified.</p>	Map-based Plan	<p>Noted. LMZ2 has been changed to a Fire Exclusion Zone. Small compostable piles are created to avoid burning.</p>
<p>Use of the term "not permitted" in the context of fire thresholds is not strictly correct. Burning can be permitted here, but is subject to an EIA and possibly a licence under the NPWS Act, unless of course what it means is not permitted by Council policy as reflected in this Plan.</p>	Map-based Plan	<p>Noted. This comment was in relation to the Plan only.</p>
<p>The insertion of a disclaimer on both the supporting document and the map is an omission that needs to be corrected as a priority.</p>	Map-based Plan	<p>Amended. A disclaimer has been included.</p>
<p>Many people would not know what an Aboriginal site or a threatened species looks like, it may be better to map a FEZ in these known locations to indicate where certain activities (e.g. planned HR, use of hand tools, retardant in close proximity to known threatened species and Aboriginal sites etc.) require prior advice and consent or at least consultation with Council where possible. They don't have to be marked as such, just shown as a type of "red flag".</p>	Map-based Plan	<p>Noted. This is not considered necessary. An environmental assessment is undertaken to assess these issues prior to burning.</p>
<p>It may also be worthwhile as a standard for these Council maps, to include the geodetic datum and projection of the map and the source and date of the air photos used.</p>	Map-based Plan	<p>Noted. Already include on the Map-based Plan.</p>
<p>I strongly urge Council to consider inserting a Disclaimer along the lines of "While Council will make every effort and endeavour in good faith to take the necessary action to implement this Plan as approved, there may be future circumstances which prevent or work against this. In this event, Council will consult and advise the community of this as soon as is reasonably possible.</p>	Page 1	<p>Amended. A disclaimer has been included.</p>

Suggested Changes	Relevant Section	Amended / Comment noted
<p>Aim should be described as reducing bush fire risk, reducing fuel is only one strategy.</p> <p>The list below is a mix of objectives and strategies to meet those objectives. This is an important part of the Plan as it provides a framework for everything else. Therefore a bit more work on structure would be worthwhile. E.g.</p> <ol style="list-style-type: none"> 1. Protect life and property from unplanned fire; 2. Protect significant environmental values from inappropriate fire regimes; 3. Cooperate with neighbours, visitors and other agencies in managing the risk of fire in the reserve and adjoining areas. 	1.1	Amended. There are now 4 objectives. See section 1.1.
It would helpful if legislative requirements were separated from statutory plans or at least linked together in a table or graphic. Hyperlinks would also be useful for the reader.	1.5	Noted. Legislation and other policies have been separated. Hyperlinks not considered necessary.
There is no mention of the Angophora Reserve Plan of Management and whether this plan replaces the fire management policies and strategies contained in that plan.	1.5	Amended. Sentence added.
There should be some reference to the Warringah-Pittwater bush fire prone lands map under s.146 of the EPA Act. A hyperlink would be handy. Whether and where it applies should be referenced in Section 2.	1.5	Amended. Pittwater Bush Fire Prone Land Map 2013 has been included in section 1.8.
The aim and objectives of BFRMP's are different from this i.e. the aim is minimise the risk of adverse impacts of fires on life, property and the environment. The objectives are to: reduce the number of unplanned fires or of human induced bushfire ignitions that cause damage to life, property and the environment; manage fuel to reduce the rate of spread and intensity of bushfires while minimising..."	1.6	Amended. Changed to <i>"The aim of the BFRMP is to minimise the risk of adverse impact of bush fires on life, property and the environment (RFS, 2010)."</i>
Might be worth mentioning that the Commissioner needs to take account of any reserve specific plan when making decisions about managing fire within the reserve under the Rural Fires Act 1997.	1.6	Noted. Not necessary. Refer to <i>Rural Fires Act 1997 - Section 44 Commissioners Responsibilities.</i>
This plan should reconcile the zoning differences between Map 1 and the BFRMP and how this will be managed via the BFRMC.	1.6	Noted. Figure 1 is a location map and not related to the BFRMP.
A short section on the other part of natural heritage (i.e. geo-diversity or landscape values) would be worth including here (e.g. special soil types, honeycomb weathering, volcanic dykes, rock gammas, catchment and aesthetic values?	2.2	Noted. Topography, Soils and Geology is detailed in Section 3.4 of the Angophora Reserve Plan of Management 2002.
For context, it might also be worthwhile to describe that the reserve is part of the IBRA Sydney Basin Bioregion and Pittwater subregion and part of the Belrose Coastal Slopes. Also reference to the bush fire prone lands map and where it applies would be very useful here.	2.2	Noted. Not considered necessary.
<p>Table 1: The area of each vegetation type would be useful to know.</p> <p>Table 1: The Keith equivalent is actually Southern Lowland Wet Sclerophyll Forests which has wet and dry elements.</p>	2.3.1	Amended. Area of vegetation types included. Vegetation community changed to Southern Lowlands Wet Sclerophyll Forest.

Suggested Changes	Relevant Section	Amended / Comment noted
Suggest that this change is a bad thing. It may not be. This is where the landscape context and diversity of fire regimes needs to be discussed. For example where it is in the sub region are there very old vegetation communities? Is this really important old growth vegetation that should be protected?	2.3.1, Appendix 1	Noted. Angophora Reserve contains significant old growth woodland and open forest communities, much of these occur in the FEZ however these old growth forests are fire dependent and will require fire at some stage.
Is there any information about the age structure within each of these vegetation types, and whether we are approaching threshold triggers? Might be useful inclusion into Table 1.	2.3.1	Noted. See Appendix 2.
It may be mentioned further on, but the impacts of dieback on the communities and the relationship with fire history would be a good discussion point. There are lots of journal articles on this.	2.3.1	Amended. Sentence added.
The chance of finding <i>Syzygium paniculatum</i> (Magenta LillyPilly) which is recorded nearby should not be discounted.	2.3.2	Noted. Already considered, see Appendix 4.
<i>"The vegetation assemblages provide habitat for feeding, roosting and breeding for many species."</i> - Many significant species such as Grey Headed Flying Fox, Koala, Squirrel Glider, Barking Owl and Powerful Owl.	2.3.3	Noted. Change not considered necessary.
<i>"Food trees including Allocasuarina spp., Angophora costata, Eucalyptus punctata, Corymbia gummifera, Banksia spp. are growing in the Reserve."</i> - <i>Syncarpia glomulifera</i> and <i>E.botryoides</i> might also be mentioned.	2.3.3	Noted. This sentence has been removed from the Plan.
<i>"Dense vegetation (to around 2m) provides protection and nesting areas for a number of small birds, gliders and Ring-tail Possums."</i> - Pheasant Coucals, Lyrebirds, Brush Turkeys and whipbirds are not what you would call "small" birds. The possible presence of Noisy Pittas should also not be dismissed.	2.3.3	Noted. Change not considered necessary.
<i>"Sandstone rock outcrops, caves and ledges and vegetated rock platforms occur on the site. These rock areas are suitable for some reptile species and rock wallabies; and there is anecdotal evidence that Diamond Pythons and even Death Adders once lived in this area (information from neighbour June 2001)."</i> - Rock Warbler could also be mentioned.	2.3.3	Noted. Although exhibiting optimal habitat e.g. rock ledges, the Rockwarbler has not been identified in the Reserve. This species has been identified in Irrawong Reserve, Warriewood.
<i>"Permanent and temporary drainage lines, creeks and pools occur throughout the reserve."</i> - Why important for fauna?? Mention of reptiles and amphibians, native fish?	2.3.3	Amended. Added <i>"...providing habitat for frogs and reptile species."</i>
<i>"Vegetation typical of damp areas grows at the base of the sandstone outcrops indicating the area may often be moist (Pittwater, 2002)."</i> - Why important to fauna?? e.g. Red crowned toadlet?	2.3.2	Amended. Sentence added.
<i>" the National Parks and Wildlife Service in 1993 estimated the koala population at only four to six animals (Higgs and Campbell 1993), and a further survey in 2003 found no animals at all (Pittwater, 2011). However, the last confirmed Koala sighting in the area was in 1987."</i> - Possible link to the health of the eucalypts in the area.	2.3.3	Amended. Sentence added.

Suggested Changes	Relevant Section	Amended / Comment noted
What about the positive benefits of fire in managing dieback, diversifying structure, creating of additional fresh microhabitat (logs, stumps and hollows) etc., providing food for top order predators such as for raptors and owls.	2.3.3	Noted. Prescribed burns occur at irregular intervals often of lower intensity and flame height (not exceeding 2 metres) so often logs, hollows etc. are not created.
Probably should mention the possibility of storylines and Aboriginal places (sites of significance) also that might be present within the reserve.	2.4.1	Noted. Not considered necessary.
A large fire was reported to have affected the Newport, Avalon and Palm Beach areas (SMH p.1 18 Nov 1944) and a large fire was also reported to have affected the Avalon area (SMH p.17-11-1946). Large bushfire reported as affecting Avalon, Palm Beach, Whale Beach, Careel Bay and surrounding country was recorded 8 December 1938 (SMH p.12).	3.1	Noted. The last significant wildfire to occur in Angophora Reserve was in 1958.
<i>"Prescribed burning is undertaken in autumn and winter"</i> - usually (i.e. not every year).	3.1	Amended. "...usually in autumn and winter".
<i>"Reduce the incidence of any damaging spring or summer wildfires"</i> - reduce the "risks associated with" incidence of any damaging spring or summer wildfires.	3.1	Amended. Sentence changed.
Table 2: It would be worthwhile to clarify that the guidelines apply differently to different zones. An extra column in table 2 for APZ would be worthwhile e.g. defining rotational 1-5 year treatments. Also a notes column would be useful e.g. defining guidelines for intensity at lower orders of frequency.	3.2	Noted. Not considered necessary.
Strictly speaking it is what the BFRMP says are the appropriate threshold values, not what the code specifies (though they may be the same).	3.2, Table 2	Noted. Lower fire thresholds used in the BFRMP are the same as the BFEAC 2006. Upper thresholds used in the BFRMP are from the Guidelines for Ecologically Sustainable Fire Management 2004.
Change Northern Hinterland Wet Sclerophyll Forests to Southern Lowlands Wet Sclerophyll Forest and a minimum fire interval of 10 years applied for Strategic Fire Advantage Zones.	3.2, Table 2	Amended. Now Southerland Lowlands Wet Sclerophyll Forest with 10 year fire interval.
Protection of life and property should always be a primary consideration. There are other strategies, i.e. other than fuel management, that might be applied to protect environment values without compromising life (including firefighters) and property protection.	3.2	Noted. Change not considered necessary.
This is where a reference to the bushfire prone lands map would be useful as the map will also identify those adjoining properties most at risk from ember attack.	3.3.1	Amended. Pittwater Bush Fire Prone Land Map 2013 has been included in section 1.8 and is also referenced in section 3.3.1.
A minor point, but "Natural Values" may be a better description. Assets are used, whereas values may not be.	3.3.2	Amended. Changed to "Natural Values"
<i>"Natural assets are also at risk from bush fires and bush fire management. Inappropriate fire regimes can severely impact the natural environment."</i> – 'Spatial pattern' may be more descriptive.	3.3.2	Noted. Not considered necessary.

Suggested Changes	Relevant Section	Amended / Comment noted
I think we should highlight that given the reserve is small and isolated from surrounding fire sources by urban development, rainforest and weed affected areas, that absence of fire can also be a serious threat to maintaining certain vegetation communities and species richness within the reserve. This section is dominated by only the negative Impacts of fire management activities, not the positives.	3.3.2	Noted. Benefits of fire on biodiversity included where appropriate.
<i>"Fire Exclusion Zones to protect sensitive vegetation and Management Actions for each zone are detailed on the Map Based Plan."</i> - isn't this another accepted FMZ category.	4.1	Amended. This is correct. LMZ 2 is now a FEZ.
<i>"Manual removal in most Fire Management Zones is not practical due to the large urban interface, limited access and the topography of the reserve. It can cost up to \$240,000 a year to manage an 80 metre APZ at \$1.00 per square metre. In this instance, manual fuel reduction and selective pile burning may be appropriate."</i> - does Council have a system in place which allows a local resident group to manually and selectively remove understorey plants without encroaching on the reserve?	4.1.1	Noted. The local bushcare group undertake works which are coordinated with the hazard reduction contract in the Reserve. Adjoining residents are not to undertake manual reduction within the Reserve unless they are part of this group.
<i>"An HRC cannot be issued for hazard reduction works on slopes over 18 degrees"</i> - or for Littoral Rainforest.		Noted. The BFEAC 2006 only applies to SEPP 26 Littoral Rainforest which doesn't occur in the LGA.
Under the Code (otherwise EPA Act applies)	4.2.3	Noted.
<i>"Burning in LMZ 1 maybe appropriate every 25 years however burning in LMZ 2 is to be excluded indefinitely to protect Littoral Rainforest EEC."</i> - in and adjoining?? – i.e. does the Council want to see the rainforest expand into surrounding areas?	4.2.3	Amended. The aim is to maintain gully areas as Littoral Rainforest and not allow it to expand into adjoining Wet Sclerophyll Forest.
<i>"Avoid medium to high intensity fires during nesting season and over large areas which reduces foraging habitat."</i> - Note: medium and high intensity fires are not permitted under the Code.	4.2.4	Noted.
<i>"Avoid damaging roost caves and structures (e.g. culverts). A 20 metre buffer from all escarpment edges is required to protect cave-dwelling bat species."</i> - Where feasible? Not all escarpment edges will have bat roosts.	4.2.4	Noted.
<i>"A WIRES or Sydney Wildlife carer..."</i> - to be contacted where rescue can be undertaken safely and effectively rather than available.	4.2.4	Amended. Sentence changed.
The location of the waratahs is not useful (note misspelling of teloppias on the map), and I wonder why these are mapped at all, and not other important values and issues that would be useful for fire authorities to know in the event of fire or other emergency e.g. natural hazards and assets such as cliff lines, rock ledges, Aboriginal sites (even if for RFS / FRNSW / SES eyes only) etc	4.2.4, Map-based Plan	Amended. Waratahs have been removed from the Map-based Plan. Aboriginal sites are not mapped to protect known locations. It was not possible to accurately map all cliff lines/rock ledges due to terrain and canopy cover.
<i>"Aboriginal heritage issues should also be discussed prior to the commencement of a burn on the day with the appropriate fire agency i.e. Fire and Rescue NSW or NSW Rural Fire Service."</i> Council should be responsible for discussing this with Metropolitan Aboriginal Land Council (MLALC) - that would be more appropriate.	4.2.5	Noted. The Aboriginal Heritage Office (AHO) is in direct contact with the MLALC.

Suggested Changes	Relevant Section	Amended / Comment noted
<i>"The NSW Office of Environment and Heritage (OEH) and the Northern Region Aboriginal Heritage Office (AHO) must be informed"</i> - This is one and the same thing. Contact should be made with OEH.	4.2.5	This is not correct. The AHO is a joint initiative between several Sydney councils to protect Aboriginal Heritage and are in direct contact with the MLALC (Aboriginal Land Rights Act 1983). OEH are responsible for protecting aboriginal cultural heritage under the NSW National Parks and Wildlife Act 1974.
<i>"In the event of an unrecorded site being found... reported to the incident controller"</i> - and to Council's reserve manager. Contact with MLALC (Metropolitan Local Aboriginal Land Council) should then be arranged via OEH.	4.2.5	Amended. Sentence changed. <i>"... Council's Bushland Officer must also be informed in order to report the finding to the OEH and AHO"</i> .
<i>"A fire exclusion zone for hazard reduction burns of at least 20 metres along the low side of all escarpment edges"</i> - This is not practical. Might be better to use the term potential archaeological deposits (PADs) and to ask for a pre-burn inspection by Council officers to record and determine what work is required.	4.2.5	Noted. Prior to hazard reduction works an REF or HRC is prepared. An inspection is carried out and Aboriginal Heritage issues identified. The inclusion of a 20 metre buffer zone was based on recommendations by the AHO.
<i>"Further investigation of SFAZ 4, 7 and 8 for overhangs is required prior to burning. Overhangs should be recorded using a GPS and fire excluded by 20 metres."</i> For overhangs a 20m Fire Exclusion is not necessary, only reducing fire intensity.	4.2.5	Amended. Sentence changed.
<i>"To avoid exotic seeds being introduced on equipment and to prevent increased weed distribution..."</i> Phytophthora and Myrtle Rust might also be covered.	4.2.6	Noted. Sentence changed <i>"To avoid exotic seeds <u>and</u> <u>pathogens</u> ..."</i>
<i>"Low to medium intensity burns may occur in APZs regardless of fire intervals unless threatened species, populations or EECs have been identified."</i> - I am not sure that this is true, as long as guidelines are followed, the burn can go ahead.	4.3	Noted. Refer to 5.5.2
<i>"Prescribed burning must be conducted in accordance with Part 5 of the NSW Bush Fire Environmental Assessment Code 2006"</i> - or an approval under Part 5 of the EPA Act.	4.3	Noted. Approvals for burning are discussed in 4.1.2 <i>Environmental Assessment</i> .
Might be worthwhile suggesting here that all fire management units will be uploaded with BFMC permission to the District Bushfire Risk Register.	4.3	Proposed burns are included on the BFMC Annual Hazard Reduction Program. Angophora Reserve as a whole is identified on the Warringah Pittwater Bush Fire Risk Register as an asset at risk.
<i>"Fire and Rescue NSW are responsible for notifying residents of a burn to be undertaken."</i> - I thought that the land manager should take responsibility for this.	4.3	Noted. Although it is Fire and Rescue NSW responsibility to notify residents. This is often undertaken by Council on their behalf at least 24 hours prior to burning.
Management Requirements - a useful list of tasks to be undertaken, assignment of responsibility and maybe timeframe would also be useful.	4.3	Noted. Change not considered necessary.

Suggested Changes	Relevant Section	Amended / Comment noted
<i>"Access to the reserve will need to be closed when undertaking a burn. Following a burn, access to the burn area must be restricted to allow for regeneration."</i> - Again this is a land manager responsibility.	4.3	Noted. Change not considered necessary.
<i>"Zones bordering LMZ 2 or any gully areas should only be burnt"</i> - "must" and "should" is a word fraught with danger. This is better as a guideline.	4.3	Noted. Change not considered necessary.
<i>"Light-up patterns should be specified in a Burn Plan prepared by Fire and Rescue NSW."</i> - What if RFS are undertaking the burn or is it being jointly implemented??	4.3	Noted. Change not considered necessary.
<i>"If a containment line must be created it should not exceed 4 metres in width"</i> - 4 metres seems excessive. 2 metres would suffice.	4.3	Amended. Sentence changed.
<i>"It is up to council and Fire and Rescue NSW to determine appropriate containment lines"</i> - and/or RFS	4.3	Noted. Ultimately it is up to Fire and Rescue NSW to determine what is safest with regards to containment lines for a hazard reduction burn, refer to 1.7.
Have RFS and FRNSW agreed to all these points. Again be careful as to what you prescribe here, you may be held to account in litigation from some of these statements. A disclaimer or rewording may be necessary. Consult Council Lawyers for advice on this.	4.5	Both the Warringah Pittwater District RFS and Fire and Rescue NSW provided input into the draft plan. A disclaimer will be included at the beginning of the Supporting Document.
The inclusion of an additional section on smoke management and associated strategies may be worthwhile given that it has been identified as an issue to neighbouring residents and communities in other parts of this Plan.	4.6	Noted. Change not considered necessary.
The mixing of responsibilities between RFS and Fire and Rescue NSW needs to be tidied up.	4	Amended. See section 1.7.
Council encouraging local groups to take responsibility for careful APZ treatments according to specifications.	4.7	Noted. Council actively encourage and engage the Angophora bush care group to manage Defendable Space and gain an understanding of fire management. Works undertaken by the bush care group are coordinated with the reserves hazard reduction contract.
If practicable, it would be helpful to allow residents to authorise (if necessary) the inclusion SWS Static Water Supply locations on this map, as some may not be obvious on the air photo (e.g. stormwater tanks, underground storages etc.).	Map-based Plan	Noted. Not considered necessary as this Plan is not an operational plan for firefighting.
Council Planning - what about the measures that Council will undertake to minimise the risk of damage to life and property and utilities through its town planning role?	4.7	Amended. Section 1.8 Development Control Planning has been included.
<i>"Feral animals in particular rabbits"</i> - foxes should also be mentioned.	4.7	Noted. Foxes are not an issue in Angophora Reserve.
Conduct and participate in debrief and organise bushcare meeting when necessary.	4.7	Noted. Change not considered necessary.

Suggested Changes	Relevant Section	Amended / Comment noted
"Monitoring of each zone should be undertaken annually prior to contractors being appointed" - 'contractors'?? I thought this plan specified RFS and NSWFR.	5	Noted. Manual hazard reduction works are undertaken by bush regeneration contractors appointed by Council.
"Consider undertaking biodiversity monitoring. Due to the lack of resources and baseline data, analysis of vegetation and indicator species response to fire is often difficult. Consider establishing a long-term fire exclusion site within the Pittwater Spotted Gum Forest vegetation to monitor changes such as increased mesic species." - Establishing a system of permanent monitoring sites (across all Council reserves) would be a better use of resources.	5	Noted. Not considered relevant. Monitoring of native vegetation across all Council reserves is detailed in the Pittwater Native Vegetation Management Plan 2012.
Not quite sure why the long-nosed bandicoot is locally or regionally significant. Not quite sure why the brush turkey is locally significant.	Appendix 3	Amended. No longer marked as 'locally significant'.
<i>Centropus phasianinus</i> Pheasant Coucal – how were these determined?	Appendix 3	Noted. Change not considered necessary. Identified in Pittwater's Native Fauna Management Plan.
<i>Eucalyptus nicholii</i> Narrow-leaved Black Peppermint - why is this here?	Appendix 4	Noted. Species identified within 3km of the Reserve.

Response

Council has considered these suggested changes in the final draft Plan. In particular, the following changes have been made;

- A disclaimer has been included at the beginning of the Supporting Document and on the Map-based Plan.
- The objectives of the Plan have been amended to include only four main objectives.
- A section on Pittwater's Development Control Plan in relation to Bush Fire Prone Land has been included.
- Northern Hinterland Wet Sclerophyll Forests, the Keith equivalent of Pittwater Spotted Gum Forest (Moist) with a minimum fire interval of 25 years has been changed to Southern Lowlands Wet Sclerophyll Forest and a minimum fire interval of 10 years applied for Strategic Fire Advantage Zones.
- LMZ2 on the Map-based plan has been changed to a separate Fire Exclusion Zone where Littoral Rainforest vegetation occurs.
- Detailed reference to the Waratah (*Telopea speciosissima*) has been removed from the Supporting Document and Map-based Plan.
- The statutory roles of Fire & Rescue NSW and the NSW Rural Fire Service have been clarified.

Submission 11

The following submission raised concerns in relation to relevant NSW Rural Fire Service legislation, some of which is outside the scope of this Plan. This submission was referred to the Warringah Pittwater District Office of Rural Fire Service for further comment. Key aspects relevant to the Plan are included below.