

EUROBODALLA SHIRE COUNCIL

PUBLIC FORUM

All members of the community who have registered have been advised that they have a **maximum of seven minutes** to put their case.

Ordinary Meeting of Council on **8 March 2022**

Name	Subject/Comments
Public Forum – 9.30am	
Dr Michelle Hamrosi	PSR22/001 Draft Climate Action Plan 2022- 2032
Bernie O’Neil	NOM22/001 Zombie Developments PSR22/001 Draft Climate Action Plan 2022- 2032
Kathryn Maxwell	PSR22/001 Draft Climate Action Plan 2022- 2032
Simon Cox	NOM22/001 Zombie Developments
Dr Jane Elek	PSR22/001 Draft Climate Action Plan 2022- 2032

Support for the Eurobodalla Climate Action Plan

Presentation for Public Forum March 8th

Dr Michelle Hamrosi
Member for Doctors for the Environment
General Practitioner, Surf Beach Surgery
Broulee Resident

I'd like to congratulate the Council on the preparation of this draft Climate Action Plan. And commend actions already taken in the past decade to reduce our greenhouse gas emissions.

Many in the community are suffering from the impacts of climate change. Adding to the insult are governments that have failed to openly and honestly discuss what must be done to save what we can from the impacts already locked in and urgently act to reduce our emissions to prevent the worst of the outcomes we have been long warned about. It is refreshing to have a new council who is willing to bring the community into this important discussion. It is sorely needed and long overdue.

This plan draws attention to the significant risks we face, not only in the long term, but also the immediate future. The actions provide an excellent start. And I wish to commend Dr Aaron Attridge and Heidi Thomson in working with council and community in this first draft.

However, I believe we can be more ambitious.

Given the overwhelming danger and urgency of the climate crisis, that the plan clearly outlines, it appears to fall short in the translation of the plan into more solid, firm actions.

In light of the evidence, it is our legal and ethical duty to do so. In fact, we are not short of inspiration, with many other councils around Australia forging the way to a zero emission future. We also have a community and community groups that want to get involved. Groups like SHASA, SAGE, and many others who will provide countless volunteer hours in this space if only asked. Let's continue to work together. Our health and wellbeing depend on it. Our businesses depend on it. Our economy depends on it. Our very future depends on it.

I will now briefly expand on two areas in which the plan identifies an immediate priority: The Built Environment and Ecosystem & Biodiversity.

The Built Environment

Creating a subdivision, sets up a community that will extend for decades to come. Every new community we build gives us an opportunity to create a healthy, connected and safe environment. This is ever more important in the daunting setting of a climate that is fundamentally changing.

“One of the clearest projections we have about how climate change will play out is more hot days and higher average air temperatures. Modelling by the NSW Government concludes that in the near future (2020-29) much of NSW will experience heatwaves more often and that last longer, and this trend will continue into the far future (2060-79). Heatwaves will also become hotter, with more days above 40°C across most of NSW (Office of Environment and Heritage, 2015)” Draft Eurobodalla Climate Action Plan Pg 4

“These temperature changes will potentially have a very significant effect on people’s ability to cope with particularly hot weather periods, especially those groups who are most vulnerable to heat, including the elderly, young, people living with disability, and people in poorly insulated housing. More heat will also drive increased electricity usage in buildings that depend on air conditioning for cooling.” Draft Eurobodalla Climate Action Plan Pg 4

With these facts in mind (and many other risks to coastal development such as sea level risk, heavy rainfall) it is critical to take a long-term view and consider the impact of climate change over the entire life of the subdivision.

Eurobodalla needs to have sustainable subdivisions that are carefully planned to achieve improved quality of life, protect and use resources efficiently and improve the health of the environment and people. Crucially, sustainability needs to be embedded from the beginning of the subdivision process.

The new Climate Action Plan needs more solid actions in this space. The way we have been managing our built environment in the Eurobodalla currently fails to integrate the considerations of all climate risks, mitigation and adaptation. And poorly designed developments are on their way, with more clone houses built with little thought to their performance over the lifetime in a changing climate. These developments and homes, with inadequate climate resilience, are now locked in over a long timeframe and cannot be easily reversed. For example, developments with no green space, no street trees and poorly designed houses, create a heat island effect in the setting of increase heat and heat waves which pose a significant health risk as the plan states:

“In the Climate Change Risk Assessment undertaken by Council with its insurer Statewide Mutual in 2020, 18 of the 37 identified impacts on Council operations (and 12 of the 25 categorised as high risk) are related to rising

temperature. The assessment identifies that without changes to Council operations and planning, rising average temperatures present a high risk to ecosystem health and biodiversity, water supply and demand, use of open space reserves and recreation assets, and water quality (higher incidence of water-borne diseases).” Statewide Mutual. 2020. “Climate Change Risk Assessment: Eurobodalla Shire Council.” Draft Eurobodalla Climate Action Plan Pg 50

Improving the sustainability performance and climate resilience of subdivision/housing etc are synergistic activities - they help reduce GHG emissions and at the same time build our resilience to climate impacts. The plan highlights the need to emphasise measures that deliver on both objectives as well as avoid maladaptation. In addition, some of the activities can also work across domains. For example sustainable housing/development can work to enhance biodiversity (by mandating inclusion of green spaces within development, reduce heat island effect, provide habitat/retain biodiversity).

Suggested inclusions:

Point 3.1 “Advocating to the NSW government to upgrade existing sustainability requirements for new buildings and significant upgrades to standards”. It is important to note that councils can make moves to challenge the status quo, without waiting for the state government. We can set the minimum standard in our LEP/Planning policy. For example, Snowy Monaro council have clauses in their LEP for north facing blocks. Avoiding dark roofing and improving green space can both help to reduce the heat island effect.

I propose a new clause, that we look at what other councils are doing and pull out the best clauses and integrate them into our LEP within the next 12 months. That way we can provide an improved minimum standard for development and improved quality of life for our community.

Point 3.3. “Facilitate improvements in the design of residential and commercial buildings and the urban form that integrate sustainability and climate resilience.”

Can the plan elaborate on what this actually stands for? What tangible actions can be measurable from this statement?

In Victoria, 29 councils were involved in a trial to help develop sustainable subdivision framework with the support of the Council Alliance for Sustainable Built Environment (CASBE). They have produced a plethora of resources that we should review and aim to incorporate into our framework for future

subdivision in our Shire. For example, they have created a Build Environment Sustainability Scorecard which is an online sustainability assessment tool purpose built by Victorian councils for Sustainable Design Assessment in the Planning Process (SDAPP) framework (1).

We don't need to reinvent the wheel. We can see what other councils are doing and adopt their ideas which have been tried and tested, while concurrently putting pressure on the state government to update their development and planning laws. This urgently needs to be done, so that from now on, all major developments must meet much higher sustainability and climate resilient requirements (2).

Point 3.5 “Seek biocertification of priority land release areas.” ‘Avoid, minimise, offset’ is the hierarchy set out by of the Biodiversity Conservation Act 2016, as well it is included as a development control in section 6.3 of the Eurobodalla Residential Zones DCP regarding Biodiversity. But yet, in areas like Broulee, critically endangered forest is being destroyed under an offsetting arrangement with no efforts being made to avoid or minimise the destruction in this process. The biocertification process that has been put in place has sadly still incurred a net biodiversity loss. I question the legality of this, especially in the context of earth jurisprudence - a legal mechanism that may expose Council and other decision-makers that are failing to take proper account of climate change.

Recommended action: all remaining credits should be retired in current biocertification arrangements and we seek to introduce a better, gold standard offset (which does not lead to net biodiversity loss as the outcome), and it only be applied as a last resort.

Developments must show that they have first applied the mechanisms of avoid and/or minimise in their design, before any offsetting is considered.

Point 3.6 “Design and implement programs for plantings and/or artificial shading of strategic urban streetscapes”

Recommended action: inclusion of an urban forest strategy. Other Councils in NSW have proven the economic value and importance of “green infrastructure” Urban green space is an integral component of a healthy urban environment providing immense services and benefits to the community. Without urban greenery cities are hotter, energy consumption is higher, stormwater levels greater, and a whole lot less oxygen to breathe(3).

Ecosystems and Biodiversity.

Currently, the way we do development in our shire is also a cause of net loss of biodiversity, something which climate change is independently threatening. Section 6.3 of ESC Residential DCP plan clearly states we should follow the hierarchy of avoid, minimise, offset (4). It would be good to see examples of this being followed in the first instance, and clear actions in the plan to prevent further biodiversity loss. For example, we could be selecting more appropriate land for development (eg. land that has already been cleared and of low biodiversity). For land that is of high biodiversity such as Broulee and Dalmeny all effort must be made to minimise rather than resorted too offsetting in the first instance.

We know that we have a number of threatened species in our shire, yet we continue to clear their habitat trees without any legal mechanisms to prevent this. It is obvious to me that development is not supportive of biodiversity and threatened species. We must do better. This must be reflected with clear actions in our climate plan.

In point 6.7, expand national parks and reserve is important, but we must also advocate the protection of our state forests which are currently being logged, despite the overwhelming scientific and economic evidence that highlights the negative harms and long term costs. (5,6,7)

Lastly, I would like to the Climate Action plan to include a one final point. To engage and educate individuals, businesses and community at every opportunity, as a specific action. Be it via the newsletter each edition, via social media (plan to have at least one post per fortnight), via annual community forums like the high school ones you ran last year. We have a mammoth task ahead, that no individual person, group or council can fix. But if we are educated and encouraged to take action, no matter how small, in every domain, every field, with positive stories to share along the way, we can create synergistic action that can achieve the impossible.

Thank you kindly for the opportunity to discuss these issues.

References

1. <https://www.casbe.org.au/what-we-do/built-environment-sustainability-scorecard/>
2. <https://www.casbe.org.au/what-we-do/sustainable-subdivisions/>
3. <https://yoursay.northsydney.nsw.gov.au/urban-forest>
4. https://www.esc.nsw.gov.au/_data/assets/pdf_file/0003/135255/Residential-Zones-DCP.pdf
5. <https://www.frontier-economics.com.au/documents/2021/11/comparing-the-value-of-alternative-uses-of-native-forest-in-southern-nsw.pdf/>
6. <https://www.bushfirefacts.org>

7. <https://secureservercdn.net/192.169.223.13/v25.8a0.myftpupload.com/wp-content/uploads/2021/09/TB-23-Logging-or-Carbon-Credits.pdf>

ABE Public Forum Presentation Regarding NoM 22/001 Zombie Developments & PSR22/001 Draft Climate Action Plan 2022-2032

8 March 2022

Good morning and thank you for the opportunity to address Council and the community this morning regarding Notice of Motion 22/001 Zombie Developments & PSR22/001 Draft Climate Action Plan 2022-2032.

I am presenting as Co-Convenor of A Better Eurobodalla (ABE), a community forum dedicated to having open and inclusive government in our region. ABE expects that before governments, at any level, make decisions that will impact their communities, they will undertake broad and meaningful consultation, listen to and share expert advice, and proceed using a transparent decision-making process so that the community understands who makes decisions, when and why.

ABE has applied these principles to Notice of Motion 22/001 Zombie Developments, which leads it to support the motion before Councillors today. ABE notes that the NoM specifically refers to the 1984 subdivision development consent at Anderson Street Tuross Head. This development is on the foreshore of Coila Lake, and has attracted widespread community interest and concern.

As part of its analysis, ABE has reviewed undertakings given by candidates during last years Eurobodalla Council election. ABE notes that at the Mayoral Candidate Forum at Kyla Hall, all candidates, with the exception of Rob Pollock, supported the following motion which specifically referenced this development:

Some years ago, Council had made a commitment to the community of Tuross Head to present the DA to Council for determination. Will you support Councillors taking back this delegation and making decisions on all major development applications to ensure community, cultural and environmental impacts are rigorously assessed before proceeding?

Considering that, it is concerning to see reports that this development has been approved under staff delegation on 2 March 2022, without any apparent involvement of Councillors. The community has put trust in its councillors, so ABE trusts that this example will not provide a template for other campaign undertakings to be cast aside so rapidly or readily.

It is worth recording that in January 2022 in response to receiving the amended plans for the Anderson St development (MDA0124-20), the Tuross Head Progress Association provided a submission to ESC (copied to Councillors) noting, among other thing, that:

the original Council DA approval for this proposed residential sub-division was granted in circa 1983/84 – and therefore subsequently there have been a number of vital changes to the environmental aspects that must now be met under current mandated guidelines before any development and related construction for such large scale sub-divisions can proceed.

And further requested:

Council to call for an Environmental Impact Assessment ahead of this MDA0124-20 being progressed for its final approval by the newly elected Council (and not dealt solely by Council staff). This will ensure that community expectations in respect of environmental aspects are met, and in particular the adequate protection of native flora and fauna that has already been outlined in other submissions lodged with your Council for the updated MDA0124 development plans.

Concerns regarding 'zombie developments' are important and valid, and formally bringing this issue to the attention of the NSW Planning Minister is a useful step which builds upon recent reforms to the NSW planning system. These have included a new clause (124AA) which clarifies that "physical commencement" is specified to **not** include the following:

- creating a bore hole for soil testing;
- removing water or soil for testing;
- carrying out survey work, including the placing of pegs or other survey equipment;
- acoustic testing;
- removing vegetation as an ancillary activity to those activities approved under the development consent; or
- marking the ground to indicate how land will be developed.

It is notable that this clause appears to unwind much of the case law that had previously found that some of these works were sufficient to constitute physical commencement.

While the situation at Anderson Street, Tuross Head is complex, ABE considers that Council, to operate in good faith, has an obligation to clearly explain the situation to the community, and ensure that water quality, biodiversity, Aboriginal heritage and flooding and drainage impacts are considered in a detailed and integrated manner reflecting contemporary knowledge and standards.

In this regard, it is concerning that documentation for the project currently available on the ESC website does not contain any Aboriginal Heritage studies, or any specific details regarding the activities and their related date/s which constitute the "physical commencement" of the development. It seems remarkable that such critical documentation has not been provided for public information on a 71 lot subdivision on the shores of a sensitive coastal lake which has a high level of community interest.

Notice of Motion 22/001 presents an opportunity to address this important issue more broadly for the NSW planning system, and ABE urges Councillors to support the motion.

PSR22/001 Draft Climate Action Plan 2022-2032: ABE supports the exhibition of the draft Eurobodalla Climate Action Plan for public comment. ABE commends Council for preparing this document, and notes the significant amount of community consultation which has already occurred.

ABE supports broadening the scope of the plan to include considering how Council can assist the community in the mitigation of, and adaptation to, climate change. It will be necessary to continue to harness the knowledge, skills and experience available within the Eurobodalla community in order to achieve the economic, social and environmental benefits that can be delivered through the implementation of the plan. Engaging members of the community in this process will lead to a better and more comprehensive result.

Thank you for your attention,

Bernie O'Neil
Co-Convenor
A Better Eurobodalla
7 March 2022

Eurobodalla Climate Action Plan 2022-2023

Thank you for the opportunity to speak on the draft Eurobodalla Climate Action Plan 2022-2023.

The Southcoast Health and Sustainability Alliance (SHASA) would like to thank Council staff for engaging with us in the development of the draft plan, in particular Aaron Atteridge and Heidi Thomson.

The plan represents a very positive change from the current Council's Emission Reduction Plan. Firstly it has shifted from solely focussing on Council operations to addressing the broader community. Secondly, it is not only dealing with measures to reduce greenhouse gas emissions but also measures to adapt to the growing impacts of a rapidly warming climate.

The draft states that available funding and resources will influence and impact the plan's implementation. SHASA's budget submission to ESC addresses this very issue.

SHASA recommends the establishment of a new budget line

- emergency recovery/community resilience with an allocation of 2.5% of the total Council budget and an increase in the environmental management budget from 2.2% to 3% of the total Council budget. Funds would be reallocated from transport and recreational services that together currently receive 55% of the total Council budget.

SHASA believes that the plan needs an additional objective:

“Work collaboratively with the community to implement the plan”

There are a number of excellent actions in the draft plan which would be enhanced by strengthening the language of the actions from “may” to “will” and the addition of the following:

Electricity Supply and Use

1.3 Amend to “Investigate where battery storage can be integrated with solar assets”.

1.7. New action “Extend Council’s water efficient appliance

rebates to energy efficient appliances for Eurobodalla residents”.

Built environment

3.7 New action “Implement street tree policy to require new developments to include shade trees along streets and help guide tree plantings along older suburban streets”.

3.8 New action “Plan for sea level rise/riverine flooding in all new developments”.

3.9 New action Planning new developments to avoid placing people in locations vulnerable to climate change driven weather events.

3.10. N32 Action Provide access to safe walking spaces, storm water management and green spaces for all residents. Allow some appropriate multiple level development as compensation for permanently protecting green spaces for all.)

3.11 New action “Reintroduce the rebate for retrofitting rainwater tanks to existing Eurobodalla residences”.

Integrated Transport

2.3 Amend to “Develop a network of shared paths linking towns across the Eurobodalla to an appropriate standard for use by pedestrians, cyclists and people using mobility scooters.”

Waste

This is the area which needs significant strengthening.

4.1 Flaring methane is not the best solution. “Council to invest in technology to generate electricity at the tips instead of flaring off methane.”

4.2 Add “..including residential food organics recycling”.

4.4 Add “Develop a new enclosed, professional tip shop at Surf Beach to increase the reuse of materials”.

4.5 Add “Regularly audit compliance with appropriate usage of the residential yellow and green bins to reduce contamination to educate and encourage correct use of bins and minimise spoil. Share the results with ratepayers”

4.6 Add “Free disposal of green waste at Council tips to

reduce fuel load for more intense fire seasons”.

Ecosystems and biodiversity

6.2 Add “Include revitalisation of the Significant Tree Register Program”.

Intact and regenerating Council owned native bushland should be preserved as valuable stores of carbon.

6.4 New. Strengthen support for the largest trees that capture and store the maximum carbon possible, and also assist in management of excess rainfall) by requiring new housing development to retain all significant trees

New action (before 6.7): “Council to advocate to NSW Government for an end to public native forest logging in accordance with the evidence that logged forests are more fire prone than old growth and that dry logging debris is responsible for starting fires due to lightning strikes.”

Agriculture and livestock

New action 7.3 “Collaborate with community groups like

SAGE Inc. to continue to grow our local food economy, and work towards increasing food security for the Eurobodalla.”

Natural hazards

9.7 Add “In collaboration with the community, continue to develop a network of heatwave and bushfire havens across the Eurobodalla, utilising NSW Government grant funding.”

Adaptive responsive Council

10.4 Amend to “Divest Council’s investment portfolio from fossil fuel funds”. Many Councils have already fully divested of fossil fuel investments.

10.7 Add “Work closely with the community on adaptive and responsive actions”.

10.8 Add “Establish a Climate Action Advisory Committee comprising expertise from the local community to advise Council.”

In Conclusion

The extreme weather events of the last 3 years in the

Eurobodalla demonstrate that we can't keep going the way we are going. **All of us need to take bold, decisive action** on climate mitigation by reducing emissions and climate adaptation by taking measures to better deal with a rapidly warming climate.

The Council will be planning to manage and adapt to more regular what were once in a lifetime events. The increased and accelerating pace of climate change makes it unlikely that we'll return to what we took for granted as normal only twenty years ago. We are moving out of stability into permanent instability. This means long lived assets will need to be engineered for multiple phase changes to deal with very different climates. This is a new way of thinking for most of us, including engineers.

So what could climate change leadership look like?

If we look back on today in ten years time, I hope it will be the beginning of an exemplary period of climate action that

will place Eurobodalla at the forefront for adaptation, preparation and equity. It's time to pivot to new ways of doing, whilst leaving nobody behind.

Thank you

Kathryn Maxwell

SHASA President on behalf of the SHASA Community.

Questions for Council – Tuesday March 8

The Tuross community is appalled to learn that this Council has approved a 38 year old development by wilfully allowing developers to bypass the concerns of the community whilst putting up the bare minimum of resistance.

Fundamentally, the communities' concerns are based around the fact that a 38 year old DA has been approved where there has never been:

- An environmental assessment undertaken
- A cultural heritage impact study undertaken, nor indigenous community consultation; OR
- Any objective, scientific consideration of the social and community impact

To any Australian, it would be a complete shock that this is even possible in modern times.

There have been many opportunities to demonstrate to the community Council's duty of care for the fragile ecosystems this development surrounds. However, Council has proceeded as if we still live in the 1980's.

The grey areas around development law and zombie development legal loopholes have been posed as excuses not to do anything, rather than opportunities to strive for better outcomes. Council staff continuously act as though the environment of the Eurobodalla is not their responsibility. They have also actively avoided open public scrutiny and community consultation at nearly every turn.

On a positive note, community members were excited yesterday to receive their first written response to the many hundreds of objections submitted over the past few years. Well done to the new Councillors for this small but meaningful step forward.

My questions are:

- 1. When will the community be provided with an understanding of the cultural heritage assessments that the developer will need to undertake to successfully apply for an Aboriginal Heritage Impact Permit (AHIP)? Will these be open to community consultation to assess?**

Given that there has never been a study done on the Eastern side of the development where there is evidence of major cultural heritage importance including grave and camp sites, the community expects a very thorough examination of the site.

Additionally, we request that Council please stop referring to the cultural heritage of the area as being known. The research undertaken on the site has been minor one-off studies that recommend much more research to appropriately assess the area. At least one of these studies undertaken for the former owners indicates a very high level of artefacts with strong spatial preservation at the site. Our research and that of qualified archaeologists recognises the area as an important, potentially sacred site.

- 2. Given there has never been consultation with indigenous communities for this DA, and the last undertaken for the development site was over a decade ago for a different DA, are the developers expected to undertake rigorous consultation with indigenous as part of the AHIP process? Will this community consultation process be open for public review before it is conducted, or will it be behind closed doors?**
3. Council have stated in correspondence with the community that because the endangered ecosystems are not within the development site and only "adjacent to them", therefore it doesn't impact the approval process. Specifically they have said

"Saltmarsh is not located onsite but is located adjacent to the site, and therefore is not directly impacted."

Is this intentional ignorance of how the natural world and neighbouring ecosystems work? Or is there something else at play here?

4. Given the many changes to environmental laws since 1984, the increased importance of preserving habitat for native animals and water quality, and given the communities expectations around the preservation of important ecosystems, why have Council been so tone deaf on this issue?

Why has Council not sought to collaborate with the developers to negotiate a more contemporary development that meets modern expectations rather than just ticking the boxes?

What efforts have been made to ask the developers to collaborate with the community to alleviate their concerns? For example, have you asked them to undertake an environmental assessment to help create a more environmentally sensitive design? What was their response?

Why have Council not been brave in their expectation setting with the developer? Why are you not trying really hard to protect this area better?

5. We understand the long term owners of the property have "cashed out" of there investment within days of modification approval. The new owners, a Newcastle development company named the McCloy group state they pride themselves on modern community focussed developments.

Is there an opportunity given the land to achieve a better level of community engagement, and a more modern approach to environmental protection?

6. Council have stated that they "may ask the developers through the use of an advisory note to consider the Federal EPBC Act".

Again this is very sheepish stuff, and demonstrates a minimal commitment to uphold modern standards.

What does this mean exactly, and have council gone ahead with this action?

7. **Please provide details for the community of specifically what the developer needs to do to ensure the Federal act is upheld?**

Some of the questions the community is seeking answers for include:

- How is the developer going to ensure they protect the Saltmarsh and Swamp Oak Forest adjacent to the development? What action will be taken if there is damage during or immediately after its construction?
- Please describe how you propose the water quality of this area will be preserved during and after the development? What specifically do you mean by water sensitive urban design? Given the extensive water flow down the golf course through the development site into the creek and forest, this would need to be extensive to be effective.
- Will the developer be in-filling parts of the water-course or the Coastal Wetlands? What impact is that likely to have on the Swamp Oak forest and Saltmarshes?
- What plans are there for the wildlife living and breeding there, the local birds nesting in the Coastal Wetlands and the migratory birds that visit the area? What are the plans for the 80+

Kangaroos that call that space home? Do Council consider themselves responsible for this or will they evade this responsibility also?

8. The ESC has assessed that the modification represents “substantially the same development”.

We understand that by law, Council are required to provide a detailed justification in writing on this decision. When will this be provided and to whom?

Comments on Draft Eurobodalla Climate Action Plan 2022-2032



Presented by Dr Jane Elek, Nature Coast
Marine Group

Thank you for the opportunity to comment on this draft document. We will confine our comments to Objectives and Actions that relate to the impacts of climate change on Eurobodalla's marine environment, both coastal and estuarine, and the impacts of those changes on our rural and urban environment.

Introductory Points

- Sea level rise: expand to include the additional issues of storm surges that have a much greater impact than the sea level rise alone.
- Warming marine environment: The ocean absorbs over 90% of the atmospheric heat we are generating so it is critical for the health of the oceans to control global warming. Warmer oceans are also responsible for more severe weather events such as storms. The south-east coast is an ocean warming hotspot with greater than average temperature increases in our ocean. Not only the heat waves but also the higher average temperatures have a huge impact on the southerly movement of northern species, which often outcompete or displace our southern species. Ocean warming is implicated in the increase in populations of urchins that need warmer water to breed, expanding our urchin barrens and causing loss of biodiversity in our great Southern Reef.

Objectives

Expand areas managed for biodiversity.

This objective and its actions should explicitly include the marine environment, and not only vulnerable ecosystems.

Manage the increased risk of natural hazards

Flooding not only from rivers but also from sea level rise and storm surges.

Agriculture and Livestock

Improve overall sustainability of agriculture and livestock production, and in particular reducing runoffs that impact water quality.

Actions

3 Built environment

3.5 Bio-certification of priority land release areas, should include reservation of land fringing the coast or estuaries that is predicted to be inundated by sea level rise, to allow expansion of saltmarshes and mangroves.

3.8 Develop a strategy for older housing stocks to allow protection of land fringing the coast and estuaries that is predicted to be inundated by sea level rise, to allow expansion of saltmarshes and mangroves. This could include purchase/rent back to allow retreat from areas likely to be flooded/inundated by sea and levees/protection that are marine-life friendly.

Water supply and wastewater treatment

5.? Allow for infiltration of stormwater into soil wherever possible to reduce output into the ocean and return water to the water table e.g. in sandy suburbs such as Broulee instead of kerb and gutter set aside areas for sediment ponds to collect stormwater and allow settling

Ecosystem and Biodiversity

6.1 Action needs to include the marine environment.

6.2 Similarly, the *Eurobodalla Biodiversity Strategy* needs to include the marine environment.

6.3 Good, but not just inter-tidal but also those above the high tide that are predicted to be inundated by sea level rise, to allow expansion of saltmarshes and mangroves.

6.? Extend or add areas protected as riparian buffers along rivers and estuaries as needed to protect banks and salt marshes to improve water quality.

6.4 Include marine ecosystems in biodiversity objectives with any Council operations on the shoreline.

6.6 Reduction of logging in native forest should be high priority, not just a consideration due to the high impact of the industry on environment and community, such as exacerbated fires, loss of biodiversity and habitat and siltation of rivers and estuaries. Any logging should be managed to prevent erosion run-off into our waterways in particular. This should include enforcement of adequate buffers along waterways.

6.7 Not only advocate the NSW Government for National Parks on land but also for Marine Parks.

Agriculture and Livestock

7.? Add in action to prevent stock eroding foreshores of lakes and rivers to protect both wetland habitat, bank erosion and water quality.

Solutions for chemical and physical waste from agriculture and livestock should be funded for research both within council and community outreach/education, including how these pollutants run-off into waterways.

Carbon emissions and use aren't the only negative effects that agriculture and livestock have on the environment. There are many new practices and strategies that integrate carbon sinkage, non-harmful substances and ecosystem benefits into a productive farm. So, a more wholistic approach to sustainable farming should be explored and promoted within this section.

Natural Hazards

9.? Develop policy for preventing or mitigating damage to existing properties from sea level rise and storm surge damage in addition to rain-caused floods and fires. This could include purchase/rent back to allow retreat from areas likely to be flooded/inundated by sea, no approvals for new development in these areas, and levees/protection that are marine-life friendly.