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CM003-11

Draft NSW Biodiversity Strategy 2010-2015 Comments
Department of Energy Climate Change and Water NSW
PO Box A290
Sydney South NSW 1232

Re: Draft New South Wales Biodiversity Strategy 2010 – 2015

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide comment on the *Draft New South Wales Biodiversity Strategy 2010 – 2015*. Biodiversity in New South Wales continues to face significant challenges. As well as addressing the legacy of past land-use impacts on biodiversity the NSW Government in partnership with councils and the communities they represent must begin to understand and tackle the cumulative impacts associated with climate change and population growth.

For the quality of biodiversity in New South Wales to be maintained and improved requires the following actions from the NSW Government:

1. An increase in funding and technical support for programs and activities that protect biodiversity.
2. Prioritising the protection of biodiversity in land use planning and development assessment processes.
3. A commitment to ensure all actions identified in the *New South Wales Biodiversity Strategy 2010 – 2015* are implemented and monitored.
4. Greater integration and coordination between the NSW Government and councils on biodiversity management activities.
5. A long term monitoring and evaluation framework.

The attached submission aims to provide constructive feedback and recommendations that will lead to the delivery of the *New South Wales Biodiversity Strategy 2010 – 2015* occurring in a coordinated and consistent manner. I trust that the information provided in this submission will receive the appropriate attention. If you wish to clarify any matter in this correspondence or require further information, please contact SCCG Senior Coastal Projects Officer, Craig Morrison on (02) 9246 7702 or craig@sydneycoastalcouncils.com.au.

Yours sincerely,

Clr. Wendy McMurdo
Chairperson

1. Introduction

The Sydney Coastal Councils Group (SCCG) welcomes the emphasis on improved management of public lands and integration of biodiversity considerations with land-use planning and natural resource management outlined in the *Draft New South Wales Biodiversity Strategy 2010 – 2015* (the Strategy). The Strategy offers a significant opportunity to establish a framework that assists in prioritising actions that address the adverse impacts on the terrestrial, freshwater and marine biodiversity of NSW.

To assist in providing constructive feedback the attached submission will provide recommendations related to the implementation of a Biodiversity Strategy for New South Wales on the following issues:

1. Enhancing the role of Local Government
2. Investment in biodiversity protection and restoration
3. Landscape and land-use planning
4. Enhancing community and volunteer involvement
5. Managing threats
6. Monitoring and evaluation.

Overall, the SCCG supports the objectives and intent of the Strategy. An ongoing commitment from the NSW Government is required to ensure that a) the actions identified are implemented; and b) coordinated monitoring and evaluation is undertaken by all stakeholders to ensure that the Strategy results in improved biodiversity management in NSW. In the absence of these actions the Strategy risks being a document of sound intent but little on-ground value.

2. Enhancing the role of Local Government

Local Government invests a significant amount of time and financial resources in the protection, management and restoration of biodiversity on public and private land in NSW. Therefore, the SCCG recommends that all Local Governments in partnership with the NSW Government be incorporated into the implementation, monitoring and evaluation aspects of the Strategy's delivery. This could be achieved through the development of an agreed implementation plan identifying actions, responsibilities and associated support.

The Natural Resources Commission (NRC) and Catchment Management Authorities (CMAs) provide a key link between the delivery of biodiversity activities of State and Local Governments as well as private landholders. Therefore the role of CMAs in assisting councils deliver the actions in the Strategy needs to be clearly identified and articulated.

Therefore, the final Strategy needs to incorporate some of the actions and methodologies listed in the *Progress Towards Healthy Resilient Landscapes: Implementing the Standards, Targets and Catchment Action Plans* report published by the NRC in 2010. This report identifies the development of a methodology for aligning the priorities articulated in Catchment Actions Plans with those of Local Government biodiversity Strategies. Therefore the SCCG recommends the methodologies developed by the NRC for aligning the priorities articulated in Catchment Actions Plans with those of Local Government biodiversity Strategies be noted in the Strategy and incorporated into any implementation plans.

Further, maintaining the continuity and enhancing success of existing programs and identifying gaps in information provision, reporting and resources should be key areas of focus for ongoing consultation. To address this, the SCCG recommends that greater integration and coordination between the NSW Government and councils on biodiversity management activities be achieved through:

- Identifying and addressing gaps in existing programs and resourcing that will limit effective implementation of the strategy's directions.
- Prioritising actions and programs that have local and regional benefits.
- Identifying opportunities for coordination in data collection, management and access to assist the strategy's monitoring and evaluation;
- Utilising and enhancing existing council partnerships with residents, community groups and regional bodies to support the strategy's implementation; and
- Linking of the strategy's delivery and reporting with other reporting processes including council internal reporting processes and external reporting including integrating sustainability reporting requirements, the planning and reporting framework articulated by the Department of Local Government and State Plan Reporting.

Recommendation:

1. The methodologies developed by the NRC for aligning the priorities articulated in Catchment Actions Plans with those of Local Government biodiversity Strategies be noted in the Strategy and incorporated into any implementation plans.
2. DECCW facilitate greater integration and coordination between the NSW Government and councils through:
 - Identifying and addressing gaps in existing programs and resourcing that will limit effective implementation of the strategy's directions.
 - Prioritising actions and programs that have local and regional benefits.
 - Identifying opportunities for coordination in data collection, management and access to assist the strategy's monitoring and evaluation;
 - Utilising and enhancing existing council partnerships with residents, community groups and regional bodies to support the strategy's implementation; and
 - Linking of the strategy's delivery and reporting with other reporting processes including council internal reporting processes and external reporting including integrating sustainability reporting requirements, State of Environment reporting and State Plan Reporting.

2. Investment in biodiversity protection and restoration

The Smarter biodiversity investment theme of the Strategy contains the following objectives:

1. *Direct public sector support for conservation efforts on private land towards state-scale priorities*
2. *Direct public land conservation efforts towards state-scale priorities*
3. *Improve the on-ground delivery of incentive schemes through the adoption of a common approach to site-assessment*
4. *Use a cost-effective approach to prioritise threatened species for Recovery*
5. *Use market-based mechanisms to complement the range of private land conservation programs*

The SCCG supports the intent of smarter biodiversity investment based on identified priorities and regional outcomes. It is important that a desire for “*smarter biodiversity investment*” is not used as a reason for limiting funding to the management and prevention of issues that lead to a decline in biodiversity value outside priority areas. The ongoing maintenance of biodiversity in NSW requires an increase in funding for management and recovery initiatives. This needs to be underpinned by the consideration of alternative investment and funding strategies.

In relation to funding the Department of Environment, Climate Change and Water (DECCW) website notes that:

“There is unlikely to ever be sufficient funding to address all the priorities in relation to biodiversity”

and

“funding that is available through a myriad of state and national programs such as Caring for Our Country, Environmental Trust, Catchment Action NSW”

Source: www.environment.nsw.gov.au/biodiversity/KeyIssuesBSDiscPaper.htm (27 January 2011)

The Strategy accepts that the current level of funding by the NSW Government for biodiversity protection and management is adequate to meet the objective of Strategy. While the SCCG supports the intent of identifying state-wide and regional priorities and robust use of market based mechanisms this approach must not be used to justify the continued reduction in funding for biodiversity protection and management programs by the NSW Government or an increase reliance on the competitive grants process to achieve long-term biodiversity improvement in NSW.

The NRC, in the *Progress Towards Healthy Resilient Landscapes: Implementing the Standards, Targets and Catchment Action Plans* report identifies opportunities for improving alignment of government investment in NRM in Figure 5.3 of the report. The SCCG recommends that the NSW Government further liaise with the NRC on formally implementing the opportunities identified.

Increased investment and technical support to manage the State’s biodiversity as a whole, not simply species or communities that have become threatened is required. To address this, the SCCG recommends DECCW undertake an assessment of the costs in implementing the actions identified in the Strategy associated with the budget allocations from relevant stakeholders to deliver the actions. This would identify gaps in funding for identified actions and provide all stakeholders with a clear understanding of the financial commitment required to ensure the biodiversity of NSW continues to be maintained and improved.

Recommendations:

1. The NSW Government further liaise with the NRC on formally implementing the opportunities for improving alignment of government investment in NRM identified in Figure 5.3 of the *Progress Towards Healthy Resilient Landscapes: Implementing the Standards, Targets and Catchment Action Plans* report.
2. DECCW undertake an assessment of the costs in implementing the actions identified in the Strategy associated with the budget allocations from relevant stakeholders to deliver the actions.
3. Based on assessment of budget allocations and implementation costs of the Strategy DECCW increase funding and technical support for the management and protection of biodiversity in NSW.

3. Landscape and land-use planning

The objective outlined in the Whole of Landscape Planning theme is to:

Use strategic mechanisms to assess, conserve and improve biodiversity values in land-use planning

In the absence of adequate funding, prioritising the maintenance of biodiversity values through landscape and land-use planning becomes essential. The draft Strategy proposes to strengthen the capacity of urban settlement planning processes to avoid, minimise and, if necessary, offset the impacts of new urban growth on biodiversity, including threatened species, and improve the efficiency and effectiveness of development assessment processes.

The SCCG supports strengthening the landscape planning process to avoid the impacts of urban growth in both established and new growth areas. Not simply new growth areas as articulated in the draft Strategy. To achieve this will require the development of standard approaches to landscape-scale biodiversity assessment and the collection of the vegetation information required to support strategic landuse planning. At present it is unclear how this will be achieved by DECCW. Therefore the SCCG requests DECCW provide all stakeholders with details as to how it will develop robust standard approaches to landscape-scale biodiversity assessment and the collection of the vegetation information.

More broadly, the protection of biodiversity in the urban coastal environments of New South Wales continues to face significant challenges. To ensure that the biodiversity in NSW is maintained or improved through landscape planning as well as land-use planning and development assessment the NSW planning framework must be amended to ensure that the councils and the NSW Government have the tools to minimise the impacts of urban growth on biodiversity through land use planning and development assessment. This can be achieved through the following actions:

- The removal of Part 3A from the *NSW Environmental Planning and Assessment Act* to ensure that environmental impact assessment is undertaken consistently and transparently for all development proposals;
- The requirement for the cumulative impacts of developments of a region's biodiversity to be considered in the strategic planning and development assessments processes;
- The strengthening of the biodiversity provisions within the Principal Local Environment Plan to provide stronger protection to biodiversity through the land use planning development assessment processes; and
- A biocertification assessment process that ensures biodiversity is protected and not simply traded off.

Recommendations:

1. DECCW provide all stakeholders with details as to how it will develop robust standard approaches to landscape-scale biodiversity assessment and the collection of the vegetation information.
2. The NSW planning framework must be amended to address the following:
 - The removal of Part 3A from the *NSW Environmental Planning and Assessment Act* to ensure that environmental impact assessment is undertaken consistently and transparently for all development proposals;
 - The requirement for the cumulative impacts of developments of a regions biodiversity to be considered in the strategic planning and development assessments processes;
 - The strengthening of biodiversity provisions within the Principal Local Environment Plan to provide stronger protection to biodiversity through the land use planning development assessment processes; and
 - A biocertification assessment process that ensures biodiversity is protected and not simply traded off.

4. Enhancing community and volunteer involvement

The Improved Partnerships theme of the strategy contains the following objective
Engage communities and develop partnerships that deliver conservation priorities.

The involvement of local residents and volunteers in the delivery of conservation priorities is essential to building on the activities of councils and the State Government. Effective engagement of communities and volunteers requires consistency and continuity with respect to the opportunities available for contact with supporting organisations and resources available for the delivery of activities.

As well as supporting existing volunteers the identification and engagement of new volunteers is an issue that needs addressing within the Strategy. It is well understood that the average age of volunteers undertaking biodiversity protection or restoration activities is increasingly significantly. Additionally, the number of volunteers undertaking these activities is decreasing.

Due to this the SCCG recommends that the Strategy be underpinned by a volunteer engagement and support action plan that identifies activities organisations will undertake to support volunteer involvement in biodiversity management across NSW. Such a plan would provide councils, CMA's and the State Government with a framework for engaging, supporting and reporting outcomes of volunteers consistently across NSW. The SCCG believes this could be achieved through the development of a Volunteer Action Plan similar to the Country, Culture and Heritage Action Plan being developed.

In recognition of the need to apply new approaches to engaging volunteers the SCCG has recently completed a Social Media Campaign as part of the SCCG Summerama Program (formerly Summer Activities Program) which aimed to increase:

1. Awareness of the coastal environment;
2. Participation (numbers of attendance) at the Summerama events; and
3. Diversity of participants (the next generation).

The SCCG is happy to share the learnings and experience gained from this project with the NSW Government. More information about the campaign can be found by contacting the SCCG Secretariat or at www.sydneycoastalcouncils.com.au.

Recommendation:

DECCW develop a Volunteer Action Plan similar to the Country, Culture and Heritage Action Plan to provide a framework for engaging, supporting and reporting outcomes of volunteers consistently across NSW.

5. Managing threats

The intent of the *NSW Native Vegetation Act 2003* and amendments made to the *Threatened Species Conservation Act 1995* in 2004 are to ensure that biodiversity values across NSW are maintained or improved. Additionally the draft Strategy aims to further strengthen existing activity to reduce the impact of issues including, pests, weeds, population growth and climate change on biodiversity in NSW. The Managing threats theme of the strategy contains the following objectives:

8. *Actively and effectively manage the terrestrial reserve system and marine protected areas as part of a broader landscape*
9. *Protect and restore aquatic ecosystems*
10. *Effectively manage and control threats through cooperative partnerships with key stakeholders*

In reference to objective 8 the SCCG believes the focus of managing threats within the reserve system is too narrow. This combined with the focus elsewhere in the Strategy to focus solely on species and communities that are already priorities is not going to prevent species and communities not represented in the reserve system or considered to be priorities from becoming endangered or threatened. It is not appropriate for the NSW Government to wait until species or ecosystems become threatened before management areas are considered for incorporation into the reserve system or restoration activities are considered necessary.

While the SCCG supports improving management of the existing reserve system, building a comprehensive, adequate and representative (CAR) reserve system (both terrestrial and marine) must be achieved first. An assessment of the adequacy of the existing CAR reserve system combined with its expansion where needed would ensure that all remaining species and ecosystem are afforded management with the reserve system and build the resilience of biodiversity in NSW to the impacts of climate change.

With reference to marine protected areas and aquatic environments more broadly the NSW marine environment must be managed in a coordinated and sustainable manner to ensure the ongoing conservation of marine biodiversity. The maintenance and enhancement of the NSW marine environment for present and future generations will only be achieved through a coordinated and well resourced management approach comprising the following:

- Identification and protection of natural values;
- Sustainable recreational use, tourism and visitor management;
- Use and extraction of marine resources consistent with the principles of ESD;
- Understanding and mitigating the impact of terrestrial land uses on the marine environment; and
- Environmental Research and Monitoring combined with education campaigns.

To achieve this, the SCCG recommends the NSW Government commit to the development and implementation of a NSW Marine Management Strategy underpinned by local and regional management plans. Such a strategy should focus on identifying appropriate and permissible uses within zones of the NSW marine zone and be combined with monitoring and research, education programs and appropriate levels of funding for enforcement and compliance.

The Strategy notes that the impacts of climate change combined with existing pressures pose a significant threat to biodiversity values in NSW. The *Mapping Climate Change Vulnerability in the Sydney Coastal Council Group* report found that for the Sydney region the vulnerability of biodiversity values in peri-urban areas was greater than existing conservation areas. To address this, the SCCG recommends the NSW Government further strengthen the level of legislative protection afforded to species and communities in peri-urban areas likely to be threatened by climate change. Further information about the *Systems Approach to Regional Climate Change Adaptation Strategies* in Metropolises and the *Mapping Climate Change Vulnerability in the Sydney Coastal Council Group* report can be found at www.sydneycoastalcouncils.com.au

Recommendations

1. DECCW prioritise the establishment of a comprehensive, adequate and representative reserve system for NSW.
2. NSW Government commit to the development and implementation of a NSW Marine Management Strategy underpinned by local and regional management plans.
3. NSW Government further strengthen the level of legislative protection afforded to species and communities in peri-urban areas likely to be threatened by climate change.

6. Monitoring and evaluation

The Strategy notes that evaluation of the outcomes will occur through reporting of progress towards achieving the biodiversity targets outlined in the state-wide targets for NRM and the NSW MER Strategy. The NRC has identified that CMAs through the reporting of their CAPs play a crucial role in the collection and analysis of biodiversity information at a landscape scale. Therefore the SCCG recommends the role of the 13 CMAs in NSW in collecting and analysing data for the monitoring and evaluation of the Strategy is clearly defined and articulated.

For many of the Catchment wide and state-wide biodiversity targets the information to monitor and evaluate change does not currently exist. Without the appropriate data, measuring the achievement or progress towards targets will be very difficult. Therefore, SCCG requests that in the final draft of the Strategy DECCW clearly state how the data needed to measure the targets will be attained, analysed and maintained.

To effectively monitor and evaluate implementation of the strategy will require:

- The existence of biodiversity information that has been collected and maintained consistently across NSW to create a baseline from which change can be assessed; and
- Standard collection and maintenance strategies for ongoing data gathering monitor change over time.

To address this, the SCCG recommends DECCW work with the NRC and CMAs to develop an information framework and strategy that identifies the following:

- What information is needed to benchmark and measure progress towards achievement of the strategy's directions and objectives;
- How (scales, timeframes, measurements) the necessary information is to be collected;
- Which stakeholders will be requested to, or responsible for, providing additional information; and
- Which organisation or organisations will be responsible for ongoing storage and dissemination of information utilised for monitoring and evaluation.

Recommendation

DECCW work with the NRC and CMAs develop an information framework and strategy that identifies the following:

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- How (scales, timeframes, measurements) the necessary information is to be collected;
- Which stakeholders will be requested to, or responsible for, providing additional information; and
- Which organisation or organisations will be responsible for ongoing storage and dissemination of information utilised for monitoring and evaluation.

Conclusion and recommendations

The NSW Government, DECCW in particular, face a number of significant challenges in ensuring the objectives of the Strategy can be met. These challenges can be placed in the categories of funding provision, integration of biodiversity protection into the land-use planning and development assessment frameworks and establishing long-term monitoring and evaluation frameworks and protocols.

To address these, the SCCG has made a number of recommendations and request a response from DECCW outlining the actions undertaken to ensure the following recommendations are undertaken before the strategy is finalised.

1. The methodologies developed by the NRC for aligning the priorities articulated in Catchment Actions Plans with those of Local Government biodiversity Strategies be noted in the Strategy and incorporated into any implementation plans.
2. DECCW facilitate greater integration and coordination between the NSW Government and councils through:
 - Identifying and addressing gaps in existing programs and resourcing that will limit effective implementation of the strategy's directions.
 - Prioritising actions and programs that have local and regional benefits.
 - Identifying opportunities for coordination in data collection, management and access to assist the strategy's monitoring and evaluation;
 - Utilising and enhancing existing council partnerships with residents, community groups and regional bodies to support the strategy's implementation; and
 - Linking of the strategy's delivery and reporting with other reporting processes including council internal reporting processes and external reporting including integrating sustainability reporting requirements, State of Environment reporting and State Plan Reporting.
3. The NSW Government further liaise with the NRC on formally implementing the opportunities for improving alignment of government investment in NRM identified in Figure 5.3 of the *Progress Towards Healthy Resilient Landscapes: Implementing the Standards, Targets and Catchment Action Plans* report.
4. DECCW undertake an assessment of the costs in implementing the actions identified in the Strategy associated with the budget allocations from relevant stakeholders to deliver the actions.
5. Based on assessment of budget allocations and implementation costs of the Strategy DECCW increase funding and technical support for the management and protection of biodiversity in NSW.
6. DECCW provide all stakeholders with details as to how it will develop robust standard approaches to landscape-scale biodiversity assessment and the collection of the vegetation information.
7. The NSW planning framework must be amended to address the following:
 - The removal of Part 3A from the *NSW Environmental Planning and Assessment Act* to ensure that environmental impact assessment is undertaken consistently and transparently for all development proposals;
 - The requirement for the cumulative impacts of developments of a regions biodiversity to be considered in the strategic planning and development assessments processes;
 - The strengthening of the biodiversity provisions within the Principle Local Environment Plan to provide stronger protection to biodiversity through the land use planning development assessment processes; and
 - A biocertification assessment process that ensures biodiversity is protected and not simply traded off.

8. DECCW develop a Volunteer Action Plan similar to the Country, Culture and Heritage Action Plan to provide a framework for engaging, supporting and reporting outcomes of volunteers consistently across NSW.
9. DECCW prioritise the establishment of a comprehensive, adequate and representative reserve system for NSW.
10. NSW Government commit to the development and implementation of a NSW Marine Management Strategy underpinned by local and regional management plans.
11. The NSW Government further strengthen the level of legislative protection afforded to species and communities in peri-urban areas likely to be threatened by climate change.
12. DECCW develop an information framework and strategy that identifies the following:
 - What information is needed to benchmark and measure progress towards achievement of the strategy's directions and objectives;
 - How (scales, timeframes, measurements) the necessary information is to be collected;
 - Which stakeholders will be requested to, or responsible for, providing additional information; and
 - Which organisation or organisations will be responsible for ongoing storage and dissemination of information utilised for monitoring and evaluation.