



SYDNEY COASTAL COUNCILS GROUP INC.

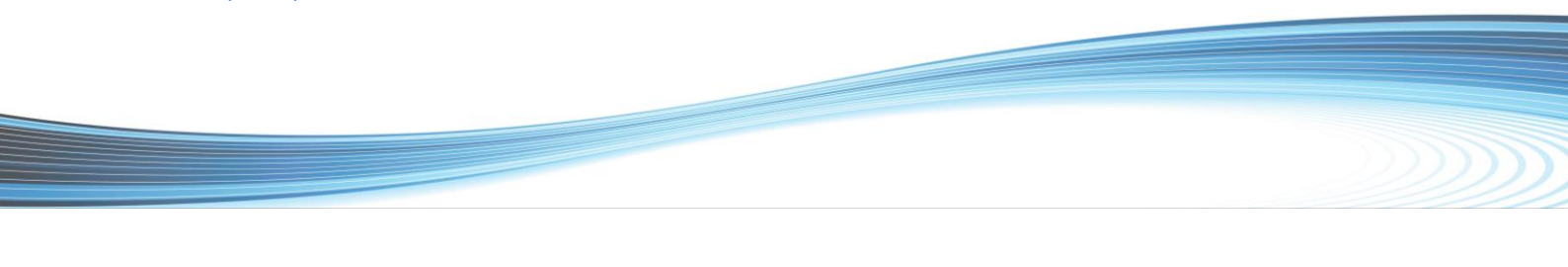
councils caring for the coastal environment

SUBMISSION

Public Consultation on National Parks Establishment

April 2015

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Introduction

We are a voluntary Regional Organisation of Councils (ROC) representing 15 Sydney coastal councils (www.sydneycostalouncils.com.au). We are the peak NSW ROC representing coastal councils and the third largest based upon population.¹ We have 25 years' experience leading sustainable coastal management.

We harness the individual and collective knowledge of our Member Councils, a suite of technical and academic experts as well as other stakeholders. Engagement is undertaken through a range of communications including meetings, workshops, information sessions and publications. Accordingly, we are able to provide unique insights drawing upon the technical, experiential and local knowledge of our Members.

General Comments

We strongly support the objects of the *National Parks and Wildlife Act 1974*, which provide for the conservation of the full range of habitats and ecosystems, plant and animal species and landforms found across the state; protection of areas of significant cultural value; and fostering public appreciation, understanding and enjoyment of nature and cultural heritage.

In light of the current review and the 2013 Inquiry into the Management of Public Land in NSW which preceded it, we consider it important to re-state that national parks exist first and foremost to promote conservation values. National parks are the only land tenure established for the principal goal of preservation of conservation values. Economic and social values are secondary to the objective of conservation and should remain so.

The National Park Estate provides the means through which the objects of the *National Parks and Wildlife Act 1974* can be realised. Comprising 8.8 per cent of NSW, the Estate has developed over time through reservations under the Act. Nonetheless, NSW has the second lowest percentage of land protected in the National Reserve System after Queensland (7.5%) and nearly half of all terrestrial ecosystems in the State remain poorly reserved and many are not protected in reserves at all.² The ongoing expansion and enhancement of the Estate is thus necessary to ensure adequate conservation of natural and cultural values in NSW.

The establishment of national parks is an important process that requires careful consideration of conservation values, as well as economic and social impacts. We support the conservation values identified by NPWS and the long-term approach taken to Estate planning. Nonetheless there is opportunity to improve the proposed directions, socio-economic assessments of acquisition proposals and community involvement in the establishment process.

This submission focuses on the area in which we have specific knowledge and expertise, namely the urban coastal and estuarine environment. Feedback is broken down into the three key areas NPWS is seeking feedback on through the review.

¹ Gooding, A 2012, *A Comparative Analysis of Regional Organisations of Councils in NSW and Western Australia*, Australian Centre of Excellence for Local Government, University of Technology Sydney.

² NSW National Parks and Wildlife Service 2014, *Directions Statement for National Park Establishment 2015-2020*.

1 Directions Statement for National Parks Establishment 2015-2020

Recommendations:

- 1a Create a new conservation priority for lands that enhance resilience to climate impacts.**
- 1b Establish specific 5-year targets in line with International Best Practice relating to the Estate as a whole and to the individual conservation priorities identified in the Directions Statement.**

We strongly support the conservation values identified in the Directions Statement. In addition to those identified, resilience to climate impacts should be a priority consideration in the establishment of National Parks. National Parks can enhance resilience to climate impacts by conserving species diversity and enhancing the ability of ecosystems to recover after adverse weather events. The Australian Government's (2012) 'National Wildlife Corridors Plan: A framework for landscape-scale conservation', recognises the importance of wildlife corridors as one of the most effective tools available for conserving biodiversity through providing alternative pathways for species' movement and adaptation, ensuring landscapes are better prepared for the impacts of climate change.

Coastal areas are particularly valuable as they act as a buffer to coastal erosion, storm surge and sea level rise. They also provide important habitat for protected species. Migratory shorebirds, for example, have been found to be particularly vulnerable to sea level rise. For example the Pittwater Waterbird Habitat Survey and Mapping undertaken in 2012 found that the present waterbird habitat in Pittwater would be entirely inundated by a sea level rise of 0.9m by 2100. This and other biologically important areas along the East Asian-Australasian Flyway should be conserved with particular consideration given to species listed under the following international agreements:

- Japan-Australia Migratory Bird Agreement
- China-Australia Migratory Bird Agreement
- Republic of Korea-Australia Migratory Bird Agreement.

In addition, we recommend the Directions Statement incorporate specific targets for the expansion of the National Parks Estate over the lifetime of the Statement (to 2020), in line with International Best Practice. These targets should relate to the Estate as a whole, as well as to the individual conservation priorities identified in the Directions Statement. The [Aichi Biodiversity Targets](#) under the Convention on Biological Diversity specify a range of actions to protect and enhance biodiversity through to 2020. Given the correlating timeframe, these may be a useful basis for the NPWS to set similar targets. Priority should also be given to monitoring progress of the proposed targets, to enable progress reporting on their effectiveness and the value of funding allocated to the establishment of National Parks and biodiversity conservation.

While we understand that the establishment process requires a degree of flexibility given uncertainty in the availability of land and funding, we believe these targets will drive whole-of-government support for lands acquisition and significantly enhance the Estate.

2 Socio-economic Assessment in NPWS Land Acquisition

Recommendations:

- 2a Investigate suitable methodologies for a holistic assessment of the social impacts of land acquisition.**
- 2b Clarify the process for incorporating conservation offsets into the National Park Estate, with particular consideration of ongoing management costs.**

The current process for assessing the socio-economic impact of land acquisition appears to rely heavily on economic indicators and values. The Level 1 process (preparing a local socio-economic profile) is the only stage at which *qualitative* information on land use and the local community is considered. The remaining two stages appear to be limited to an assessment of financial and economic indicators (Level 2) and cost-benefit analysis (Level 3). We are concerned that this process precludes a holistic assessment of the social impacts of land acquisition, particularly if those impacts cannot be quantified in economic terms.

An additional issue that needs consideration is conservation offsets and bio-banking. These planning tools are designed to allow development that may or will have a significant environmental impact by conserving areas either on-site or offsite. The process for these offsets to be incorporated into the National Park Estate needs to be clarified, particularly the ability of NPWS to ensure their long-term management. While there may not be an upfront cost in their acquisition, the ongoing management of these lands presents issues for the NPWS given the significant budgetary constraints imposed on the service in recent years. The economic assessment of such acquisition proposals must thus be cognisant of ongoing management costs.

3 Community involvement in national park establishment

Recommendations:

- 3a Establish a localised community consultation process on the conservation directions for each of the National Park Estate planning regions.**
- 3b Develop a standardised process for engaging community in the assessment of land suitability.**
- 3c Develop an agreement in partnership with other public land managers that sets out a cross-tenure approach to integrated planning for the National Park Estate.**

The Regional Advisory Committees established under the *National Parks and Wildlife Act 1974* and Regulations are a valuable conduit for community and stakeholder input on the planning and management of the National Park Estate. However we believe there is scope to enhance the level and nature of community involvement in the reserve establishment

process, particularly during the stages of protected area planning and assessment of land suitability. Specifically:

- we recommend a more comprehensive and localised consultation process is undertaken on each of the National Park Estate planning regions described in the Directions Statement. In particular, the near-term directions identified for each planning region should be determined through community consultation, in which community members are provided with the information they need to make a meaningful and informed contribution.
- there should be a standardised process for engaging community in the assessment of land suitability. This would ensure local and tacit knowledge is considered during the assessment process, and that social values which are difficult to quantify can be identified.

We also believe there is scope to build upon and strengthen this process through a formalised agreement between NPWS and other public land managers (including Crown Lands and Local Government) that sets out a cross-tenure approach to integrated planning. This agreement should include:

- shared management objectives
- a framework for integrated planning and coordination of policies and plans
- processes for regular consultation and information-sharing between public land managers.

Summary of Recommendations

- 1a Create a new conservation priority for lands that enhance resilience to climate impacts.**
- 1b Establish specific 5-year targets in line with International Best Practice relating to the Estate as a whole and to the individual conservation priorities identified in the Directions Statement.**
- 2a Investigate suitable methodologies for a holistic assessment of the social impacts of land acquisition.**
- 2b Clarify the process for incorporating conservation offsets into the National Park Estate, with particular consideration of ongoing management costs.**
- 3a Establish a localised community consultation process on the conservation directions for each of the National Park Estate planning regions.**
- 3b Develop a standardised process for engaging community in the assessment of land suitability.**
- 3c Develop an agreement in partnership with other public land managers that sets out a cross-tenure approach to integrated planning for the National Park Estate.**