



13 February 2008

Biodiversity Discussion Paper Comments
Department of Environment and Climate Change
PO Box A290
Sydney South NSW 1232

Dear Sir or Madam,

Re: A New Biodiversity Strategy for New South Wales – Discussion Paper

Thank you for the opportunity to comment on the issues relating to NSW's new strategy. Southern Sydney Regional Organisation of Councils represents 16 southern Sydney councils, with a combined population of over 1.3 million. Whilst our region includes extensive coastline and expanses of parks and reserves, much of the area that comprises the region is primarily urban, highly developed and in some parts, very densely populated. Such a diverse region gives rise to a wide range of issues in relation to biodiversity: the major issues are highlighted in the following points.

1. Urban Biodiversity

Biodiversity issues and concerns are very often considered to be rural or sometimes peri-urban. Urban issues are often missed, and yet they are very real – from the prevalence and nuisance of invasive species such as foxes and Indian mynah birds, to the destruction of habitats and corridors and exploitation of the urban environment by successfully adapted native species such as cockatoos and possums. It would be helpful for the future strategy to include specific approaches to the urban context where a balance is also required between human needs and the needs of other species.

2. Data

We need to identify, protect and enhance native biodiversity if we are to make appropriate interventions and to validate the effectiveness of those interventions. There is therefore a need to establish a data set that enables information from different areas to be reliably compared and aggregated at local, regional, State and national levels. The MER Strategy has potential at one level, but has yet to be effectively applied to urban areas: SSROC is keen to work to address this should funding become available for an initiative in this area.

Comprehensive reporting of biodiversity and the condition of habitats is necessary. If State of the Environment reporting is to be incorporated into integrated reporting in the future, then a consistent minimum data set needs to be defined and used.

3. Habitats

Appropriate habitats are critical to biodiversity, and SSROC supports the concept of Regional Conservation Initiatives. The need for green corridors has been understood

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for some time now, and was being addressed through the establishment of GreenWeb Sydney, which has become ineffective in recent years (covered in our separate submission in relation to GreenWeb Sydney). Aquatic habitats are equally critical. For both terrestrial and aquatic habitats, links or connections are also essential to enable movement and yet can be problematic, particularly across LGA boundaries. Mapping is therefore essential, and needs to be done to a standard that will permit theoretical connectivity on maps to reflect the true habitat (including its condition) on the ground. Mapping therefore should be comprehensive and adequate, and enable a custodian to have oversight of the whole network of habitats/corridors with a view to protecting it to the extent that enables the network to function effectively.

4. Policy Integration

It is absolutely essential that biodiversity should be taken into account in strategic urban planning. Any new biodiversity strategy must take into account the planning reforms. Similarly, the planning reforms must accommodate the biodiversity strategy. The two issues are not separate and should not be treated as such. Any new biodiversity strategy development process should simplify and clarify the biodiversity-related aspects of the development approval process. In particular, the new Local Environment Plan template is weak in this area, and SSROC suggests that it should be amended to incorporate environmental clauses including enforceable clauses related to biodiversity, habitats and corridors.

Biodiversity initiatives also need to be framed so that they are comprehensible and complementary.

5. Climate Change Adaptation

In order to address the climate change in relation to biodiversity, data (see point 2 above) will be critical at the most granular level. In addition, it will be necessary for Councils to have a clear understanding of their LGAs' vulnerabilities and to examine the risks of those vulnerabilities in terms of the diversity of species across the area. A risk management approach, such as that outlined by in the Department of Climate Change's "Climate Change Impacts and Risk Management – A Guide for Business and Government" is important to addressing this and developing a management plan. Continued monitoring of the threats identified will be required, as will adjustments in response to the emerging effects.

Thank you for the opportunity to provide these comments in response to the discussion paper.

Yours sincerely,

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