

# **Draft Submission on draft Biodiversity Conservation Investment Strategy 2017 -2037**

December 2017

## Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing all NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community based system of local government in the State.

LGNSW welcomes the opportunity to provide input into the draft *Biodiversity Conservation Investment Strategy 2017 – 2037*, a strategy which will guide the newly formed Biodiversity Conservation Trust to deliver investment in private land conservation across NSW.

Please note that to meet the consultation timeframe, this submission is provided in draft form in anticipation of LGNSW Board approval. LGNSW will advise the Office of Environment and Heritage (OEH) of any amendments to the submission.

## Response

### Local government and biodiversity management

Biodiversity management and protection is a key area of responsibility for local government and is of great interest to local communities. Councils have responsibilities to protect and manage their local environment while facilitating growth and development in their local areas. Councils have a clear legislative mandate to manage the ongoing challenge of development pressure and maintenance of environmental values. Over time, councils have responded to this challenge through improved knowledge of and strategic planning for their local biodiversity including undertaking mapping and assessments, developing biodiversity strategies and policies and processes, and building the capability of staff.

While the interaction between planning decisions and biodiversity management is critical, local government has a broader more holistic approach to biodiversity management as public land managers and through community education and engagement activities.

As the sphere of government closest to the community councils are often the first point of call for community and landholders to discuss issues which impact on biodiversity. They also have detailed knowledge of their local areas which may prove valuable in identifying private conservation investment opportunities.

The Strategy identifies the need for local engagement and planning to verify sites prior to the Biodiversity Conservation Trust making investment decisions, even where the site is identified through the subregional mapping. Councils support this cross checking prior to investment and have local maps, data and knowledge that could be considered in this process. This may be even more relevant in areas close to urban zones or potential areas for rezoning for future development.

***Recommendation: Consult with council's biodiversity mapping and LEP prior to investment decisions being made.***

### Biodiversity Investment Strategy

Local government broadly supports the proposed approach of targeting investment to areas identified as conservation priorities. The proposed principles for the identification of investment areas are sound and will result in significant financial investment and economic benefit to these areas. Councils outside of these proposed priority areas have raised some concerns that this approach, and the associated economic benefits of private land conservation as described in the Strategy, will only occur in these regions.

While we understand that the Strategy aims to prioritise investment there are some subregions, including coastal areas, that are not considered priority investment areas. The Strategy does also state that there is likely to be some investment made available to landholders in areas which meet the national ‘representativeness target’ however coastal subregions may be less competitive for investment opportunities in private land conservation without some funding being specifically allocated to these subregions. The Strategy should allocate a proportion of investment to subregions that are not considered priority areas to ensure locally important conservation assets are protected and to more equitably spread the economic benefits of private land conservation across the State.

Local government supports prioritising investment which complements other mechanisms supporting biodiversity conservation, which could include land reserved for environmental purposes in environmental planning instruments or voluntary planning agreements. Such an approach would provide for greater biodiversity protection and potentially link areas under different protections to create a broader area for conservation outcomes.

***Recommendation: The Strategy should allocate a proportion of funding to areas outside the priority areas, to invest in locally important conservation assets.***

### **Private land conservation**

The Strategy identifies private land conservation as: *‘Landholders who enter into voluntary agreements to protect and manage their properties (or parts of their properties) for biodiversity conservation outcomes. This may include land that is privately owned and managed as well as Crown Land, which is managed both publicly and privately such as Travelling Stock Reserves.’*

Clarity is sought regarding the status of public reserves owned and managed by local government authorities for bushland or other associated objectives. Many of these areas are of high conservation value and should be eligible for investment if applying the same rationale for the investment in Crown Land and TSRs.

***Recommendation: Include relevant land owned and managed by local government authorities as eligible for private land conservation agreements and investment, as is proposed for Crown Land and TSRs.***

## **Summary**

The Biodiversity Conservation Trust provides an important opportunity for investment in biodiversity conservation. While the principles and approach described in this Strategy are broadly supported, the Strategy could be strengthened through a greater recognition of local government and its role at the local level in managing and protecting biodiversity. Local site-based investment decisions would benefit from engagement with local government, which has responsibilities and programs and policies in place to support the protection and enhancement of local biodiversity, prior to decision making.

Thank you for the opportunity to provide comment on the draft NSW Biodiversity Conservation Investment Strategy.

We would be pleased to discuss the issues raised in this submission further. Please contact Kirsty McIntyre at LGNSW on 9242 4055 or [kirsty.mcintyre@lgnsw.org.au](mailto:kirsty.mcintyre@lgnsw.org.au).