



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

Dear Sir/Madam

RE: NSW Biodiversity Strategy – UDIA NSW Submission

The Urban Development Institute of Australia NSW (UDIA NSW) has reviewed *A New Biodiversity Strategy for NSW: Discussion Paper* and appreciates the opportunity to comment. UDIA NSW is the peak industry body representing the interests of the urban development industry in NSW. UDIA NSW aims to secure the viability and sustainability of the urban development industry for the benefit of our members and therefore the communities that we create.

UDIA NSW's advocacy is focussed on three key themes for the development industry:

- affordability;
- investment certainty; and
- sustainability

The urban development industry is a major contributor to the NSW economy and its investment decisions are guided by key strategic documents. These include the State Plan, the Sydney Metropolitan Strategy various Regional Strategies and the NSW Biodiversity Strategy.

UDIA NSW believes that delivering sustainability must be fundamentally concerned with ensuring intergenerational equity. This includes the preservation of environmental outcomes in balance with social equity by improving access to economic stability.

Inherent in this balance is the need to ensure that the cost of delivering genuine sustainability is shared by the broad base of beneficiaries to the outcomes. It is within this perspective that UDIA NSW has provided comment on the draft Strategy, and identified three key areas of concern.

1. Biodiversity as a component of key strategies

UDIA NSW acknowledges that biodiversity conservation is a key consideration to ensure sustainable outcomes for future generations. To achieve a balanced and sustainable future, the strategy should incorporate the triple bottom line approach where social, economic, and environmental outcomes are balanced.

UDIA NSW therefore contends the four proposed Strategy fundamentals are insufficient if biodiversity conservation is to be ensured. UDIA NSW recommends five additional approaches to be included within the Strategy:

- *A holistic business plan approach*

The Strategy must develop a business plan on priorities to achieve biodiversity objectives. This would include development of the management approach to achieve the objectives of the Strategy. Such an approach would prevent ad-hoc decision making and would result in more effective biodiversity conservation.

UDIA contends the NSW Biodiversity Strategy should also identify the strategic and priority land areas where conservation objectives can be undertaken. This requires all State agencies to work together to identify important biodiversity areas, as well as the funding and management arrangements required to retain the biodiversity.

The Discussion Paper should also adequately address and outline the processes for review, challenging the implementation of the Strategy by stakeholders, and the processes to be undertaken for updating the Strategy.

A more strategic approach would also include consideration of biodiversity outcomes based on urban or rural circumstances. This is necessary as both urban and rural areas require different approaches to retain biodiversity and sustainable communities.

- *Consistent approach to assessing biodiversity*

A cost effective approach to targeted investment in biodiversity would provide for more effective biodiversity outcomes. This approach is necessary to ensure clearly measured and transparent benchmarks are used to assess and achieve the objectives of the Strategy.

- *Coordination with agencies and integration with other government strategies and policies.*

The Strategy must be developed in coordination with the metropolitan and regional strategies, as well as other biodiversity or vegetation plans. Integrated strategies provide more certainty to the development industry and a clearer framework for conservation or management of biodiversity.

Integrated strategies also provide more transparent guidelines and plans of management for the broader community. A holistic approach with other government strategies may also result in effective funding arrangements or an investment framework being included within the Strategy.

- *Biodiversity should be linked into the planning system.*

UDIA NSW contends that the Strategy must be linked and integrated with the NSW planning system and captured in the Department of Planning Regional Strategies and Local Environment Plans (LEPs). The Strategy should provide sufficient certainty and transparent processes so as not to significantly impact on the feasibility of current or new developments. This would remove the potential for additional housing affordability constraints.

- *Improved knowledge and information*

Providing updated information, electronic information and education to both the development industry and the conservation groups will assist in providing outcomes that are needed to retain biodiversity.

2. Roles and Responsibilities

For the Strategy to be successfully implemented it must outline and detail the role of DECC and other state government agencies. Ideally this would include the shared objectives and implementation procedures with other departments and agencies, so as to avoid single issue planning. Part of the roles and responsibilities within the Strategy should also be to outline the role of non government organisations and other conservation focussed stakeholders.

UDIA NSW contends the governance framework within the Strategy must also consider and clarify biodiversity management issues such as management responsibilities on private land. It is crucial that this information is disseminated to private landholders, and that there are clear processes to allow landholders to discuss, clarify, or object to, material put forward. This will assist in transparency of process, and implementation procedures of the Strategy.

UDIA NSW also recognises the challenges presented by accelerated climate change (please refer to UDIA NSW's Climate Change Discussion Paper on its website www.udia-nsw.com.au). UDIA NSW encourages the creation of urban development that is capable of adapting to an evolving physical environment while minimising greenhouse gas emissions through innovation, good design, efficiencies and technological advances.

UDIA NSW recognises that the natural environment and biodiversity play an important and balanced part of the sustainability of our future communities. These objectives, however, must be delivered within an economic and regulatory framework that ensures affordability for future generations.

3. Integration with Biodiversity Banking

There is potential for conflict to arise with the financial mechanisms of biodiversity banking and other non financial implementation actions. UDIA NSW contends that the Strategy should provide clarity on this conflict, as well as provide certainty on the offset ratios.

Recommendations

UDIA NSW proposes the following recommendations to assist in the development of a comprehensive, transparent and effective Biodiversity Strategy:

1. *UDIA NSW recommends the strategy should be developed within a business plan framework. It should clearly identify priority biodiversity outcomes, how they are intended to be delivered, and how they will be funded.*
2. *The designation of land for biodiversity must be incorporated into the broader planning process providing for discussion amongst a wider range of stakeholders. This would hold Government accountable for economic and social impacts of such decisions and provide increased certainty to the development industry;*
3. *Clarity between the relationship of the Biodiversity Banking Scheme and other biodiversity management strategies must be detailed.*

UDIA NSW would welcome the opportunity to elaborate on this submission and the Biodiversity Strategy with the DECC further. Please contact UDIA NSW Policy Officer Adrien Byrne by email at abyrne@udia-nsw.com.au or 02 9868 3677 if you wish to arrange a meeting.

Yours sincerely

A handwritten signature in black ink that reads "Nick Duncan". The signature is written in a cursive, slightly slanted style.

Nick Duncan
Chief Executive Officer