

The General Manger
Ku-ring-gai Council
818 Pacific Highway
GORDON NSW 2072
kmc@kmc.nsw.gov.au

Attention: naturalareas@kmc.nsw.gov.au

4 November 2021

Dear Mr McKee

RE: FOKE Submission on Draft Biodiversity Policy S04551/16

Thank you for the opportunity for Friends of Ku-ring-gai Environment (FOKE) to respond to Ku-ring-gai Council's Draft Biodiversity Policy, Version Number 2. FOKE apologises for this late submission.

FOKE initially accepted Ku-ring-gai Council's premise that the Draft Biodiversity Policy Version Number 2 merely updated the 2016 Biodiversity Policy. However much has happened since 2016 with increasing scientific evidence that the biodiversity crisis is accelerating. FOKE takes the view that the Draft Biodiversity Policy must be more ambitious in halting extinction scenarios for Ku-ring-gai's biodiversity. The Draft Biodiversity Policy needs to be dramatically strengthened in light of Australia's 2019-20 Black Summer Bushfires that were environmentally cataclysmic for biodiversity and killed an estimated 3 billion wildlife.

Climate change is also dangerously accelerating as outlined in the United Nations Intergovernmental Panel on Climate Change (IPCC) 2021 report. Scientists fear that unless emissions are drastically reduced before 2030 we will pass tipping points where the global climate systems will irretrievably break down with devastating consequences for humanity and biodiversity.

Ku-ring-gai is not immune to the impacts of climate change. Wild storms are increasing in frequency and intensity. In 2019 Gordon and Pymble were hit by wild storms that had 90km/h wind speeds tearing down many trees. Extreme heat waves are becoming more frequent. On 4 January 2020 the highest ever temperature - 48.9 degrees Celsius - was recorded in Greater Sydney at Penrith. In 2019 bushfires were close to getting out of control in South Turrumurra with temperatures reaching 37C heat, accompanied by fierce winds.

In October 2021 the United Nations' COP15 Biodiversity Conference met (to reconvene again in Kunming, China from 25 April to 8 May, 2022) with the agenda of finding solutions to halt the rapid

decline of global biodiversity due to habitat loss, climate change, invasive species, overexploitation, deforestation, fragmentation, and pollution. 'Mass extinction' events are becoming more frequent globally and locally.

The 2020-21 COVID-19 pandemic also highlighted just how critical biodiversity is to human health, wellbeing and security. The global pandemic resulted because of ecosystem degradation that unleashed a highly dangerous and contagious pathogen into the human population. The pandemic also highlighted how important Ku-ring-gai's natural environment is to providing solace and comfort during the lockdowns.

FOKE recognises that biodiversity collapse is converging with the climate change emergency and these existential threats need to be reflected in the Draft Biodiversity Policy.

More Ambitious Biodiversity Goal

FOKE argues that the Draft Biodiversity Policy needs to be more ambitious in addressing the biodiversity crisis. FOKE requests that the opening sentence under the heading 'Policy Statement' (page 7) be changed to adequately reflect this biodiversity crisis.

More Resources for Biodiversity

FOKE urges Ku-ring-gai Council to provide additional financial resources that make biodiversity a priority in its budget. The paltry \$3 million allocated to the natural environment and sustainability initiatives is inadequate to deal with Ku-ring-gai's biodiversity crisis. Without resources many threatened species will continue towards extinction. Additional funds are needed to protect and restore threatened species and ecological communities facing complex and multiple threats.

FOKE recommends that Ku-ring-gai Council establish a special fund for the acquisition of environmentally sensitive lands.

Overdevelopment - a driver of biodiversity loss

FOKE has consistently argued that the underlying drivers for biodiversity loss are the NSW Government's urban densification policies that result in habitat loss, fragmentation and deforestation. Their cumulative impact has significantly degraded the character and environment of Ku-ring-gai.

Ecologically Sustainable Development must become the central tenet to every planning and development decision with the prohibition of development in environmentally sensitive areas.

FOKE has ongoing concerns about the NSW Government's 'A Metropolis of Three Cities' policy and its 'green grid connections' as outlined in the Ku-ring-gai Local Strategic Planning Statement (2020) and reasserts it will deliver poor biodiversity outcomes for Ku-ring-gai.

FOKE is pleased that Ku-ring-gai Council acknowledge these 'incongruent objectives' of 'fast urban growth' and 'protecting and enhancing the natural environment' in the Draft Biodiversity Policy:

. . . the current era of environmental policy is driven by the impact of fast urban growth and infrastructure on the environment's capacity to continue to support economic growth whilst maintaining natural amenity. Undeniably, the future challenge for Ku-ring-gai Council is to bridge these seemingly incongruent objectives by delivering a high quality sustainable built environment whilst protecting and enhancing the natural environment. (page 10)

A Commitment for Targets

The Draft Biodiversity Policy should include targets to ensure biodiversity loss stabilises with the recovery of natural ecosystems by 2030, and with net improvements by 2050.

FOKE comments on the Objectives of the Draft Biodiversity Policy - page 5

Conservation

iii. encouraging the recovery of threatened species, communities, populations and their habitats

This objective of “encouraging the recovery of threatened species, communities, populations and habitats” needs to be not just about encouragement. It needs to scientifically verify that Ku-ring-gai threatened species, communities, populations and habitats are resilient to survive into the future. FOKE recommends replacing the word ‘encouraging’ with ‘ensuring’.

Conservation

v. protecting, restoring and enhancing connectivity corridors and buffers

FOKE recommends that an additional phrase be added to this objective:

*v. protecting, restoring and enhancing connectivity corridors and buffers **through prohibiting development in environmentally sensitive areas and through environmentally strategic land purchases***

The Draft Biodiversity Policy also needs to provide a statement about the provision of wildlife emergency rescue measures for when, for example, extreme heat waves threaten the Ku-ring-gai Flying Fox Colony.

Conservation Objective

vi. applying best practice natural resource management and Ecologically Sustainable Development (ESD) principles.

FOKE recommends that replacing the word ‘applying’ with ‘mandating’

Appropriate governance

Ensure biodiversity is appropriately addressed and integrated within strategic land use planning, policy and decision-making.

FOKE has long called for stronger environmental strategic land use planning. Biodiversity protection must be elevated as the central tenet within strategic land use planning, policy and decision-making.

4. Collaboration and partnerships

Strategically collaborate with the community, educational institutions, NGOs, special interest groups, the Indigenous community and all levels of government to maintain, enhance and restore biodiversity at a local, regional and national level.

FOKE requests the Ku-ring-gai Council create a new Ku-ring-gai Council Biodiversity Advisory Committee with representatives from local environment groups on it, including representatives from FOKE.

6. Climate change responsiveness

Protect and enhance the carbon reservoir in Ku-ring-gai’s ecosystems to mitigate against climate change and implement adaptive management responses to address the impacts of climate change on Ku-ring-gai’s biodiversity.

In light of the latest IPCC report - this Objective needs to be much stronger.

Statutory Planning, Policy & Regulation - page 12

FOKE believes that Ku-ring-gai Council undertakes new baseline studies to inform the NSW Government that many of its statutory planning processes are failing biodiversity protection and conservation.

FOKE also believes Ku-ring-gai Council has an obligation to expose the dubious claim that offsets 'improve or maintain' outcomes for Ku-ring-gai's biodiversity such as the problematic 'double dipping' offset schemes for reserves that hold existing protections, as recently acknowledged by the former NSW Environment Minister Matt Kean. <https://www.theguardian.com/australia-news/2021/oct/26/nsw-environmental-offsets-to-be-reformed-after-appalling-practices-revealed-minister-says>

Conclusion

Protection and conservation of our biodiversity requires not only progressive policies for its management, but also penalties where developers and residents fail to undertake the agreed conservation measures as stated in the final Ku-ring-gai Biodiversity Policy. Without penalties in the form of significant fines and remediation works, the continuing degradation of Ku-ring-gai's significant biodiversity will continue to occur as population and densification increase. This is an aspect of the Draft Biodiversity Policy that is currently not covered and needs to be included for an effective implementation of this policy.

Ku-ring-gai's Draft Biodiversity Policy is an opportunity to build a better future in harmony with nature. Ku-ring-gai stands at a crossroad over the legacy as to whether it will leave a biodiversity rich Ku-ring-gai for future generations. Biodiversity in Ku-ring-gai is under significant extinction pressure, and we need a Biodiversity Policy that will reverse this crisis.

Yours sincerely,

Kathy Cowley
PRESIDENT

cc Mayor and Councillors

cc The Hon Jonathan O'Dea MP Member for Davidson

cc The Hon Alister Henskens SC MP Member for Ku-ring-gai

cc The Hon Paul Fletcher MP Member for Bradfield