



Lane Cove Bushland & Conservation Society Inc

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Submission: Greener Places Framework: An urban green infrastructure design framework for New South Wales and Draft Greener Places Design Guide: Government Architect New South Wales.

The Lane Cove Bushland & Conservation Society (LCB&CS), established in 1971, is pleased to provide a submission on the State government “Greener Places” consultation. As a non-aligned community organisation the LCB&CS advocates for the protection and conservation of our local urban bushland as well as state and federal bushland relevant matters. Our comments and recommendations draw on our long experience in our advocacy role in Lane Cove but have wide relevance to urban bushland.

The LCB&CS welcomes many of the sentiments and aspirations of the Draft Guide and connected Design Framework such as the themes of (inter)connectivity, tree canopy, and definition of urban bushland (p. 45). However, the LCB&CS has serious concerns that fundamental aspects in the recognition and maintenance of urban bushland require stronger recognition and recommendations in the Greener Places Framework and Design Guide which will be influential in a new Design and Place SEPP. It is thus crucial that from the outset urban bushland is not confused and merged with general notions of the green space of parks, gardens and playing fields. It is a discrete entity fundamental to Sydney’s ecological biodiversity and as such requires separate and specific recognition and protection.

We detail our major concerns:

1. *The documents do not specify strong statutory protection of urban bushland. Urban bushland requires a specific SEPP and guidelines with site specific Bushland Plans of Management (BPOM).*

Despite the Guide’s aspirations and sentiments, only strong legislative protection for urban bushland can ensure the long-term viability of our remnant urban bushland and protect it from being further reduced by the intensification of land use and ongoing development pressures. It is essential for the retention of its ecological value. Only legislative protection and money spent demonstrate actual NSW government commitment to urban bushland.

2. *It is unclear how long-standing and effective local government biodiversity strategies in Bushland Plans of Management would relate to concepts in the proposed Strategic Urban Biodiversity Frameworks (SUBF).*

Many of the concepts included in the SUBF in Section 3.3 are embodied in Lane Cove’s BOPM but the LCB&CS is concerned that Lane Cove’s carefully structured and well tested BPOM may be discarded in favour of yet another untested document.

3. *Urban bushland requires ongoing skilled management. This management is currently implemented at the local government level, and by its nature, must continue to be implemented at the local government level.*

Urban bushland reserves need protection from fragmentation through development and notions of the location of “small recreation and space nodes” in bushland (p. 23) will diminish ecological resilience. Local government is known to be focused on the local community and is best placed to protect and manage urban bushland in their respective LGA. Together with stronger legislative protection (see 1 above), local government must be given responsibility for implementing the protection of urban bushland. Current successful practices include: active bushland sections within councils with skilled and knowledgeable employees; well established records, processes and mapping (see for eg. Lane Cove Council BOPM), and the longstanding and proven record of delivering results.

4. *The management, maintenance and protection of urban bushland requires reliable, dedicated, long term funding which must happen at the NSW government level.*

The funding section of the Guide (section 3.6 and p. 55) does not guarantee security of funding which is a serious concern. Since the 1970s, when bush regeneration first began in Lane Cove, the costs for urban bushland protection and maintenance have escalated. The cost burdens of development remediation (such as erosion, hard surface run-off, siltation, undercutting and collapse of banks) have been left to council bushland sections – not developers – seriously reducing money available for bushland maintenance and revegetation. Funding to councils has been through short term, one-off and ad hoc grants. Good will and local volunteers are strongly relied on. The unreliability and insufficiency of funding is unbecoming of a city such as Sydney, globally recognised as unique with its combination of harbour, headlands and bushland interconnected with urban living.

The recent online discussion on the *Design and Place SEPP between Minister Stokes and Abbie Galvin GANSW (June 2020)*, called for involvement the new SEPP process and referred to workshops planned for wider input. Thus:

5. *The LCBCS would welcome the opportunity to discuss how the protection and maintenance of urban bushland relates to the proposed Design and Place SEPP and the draft consultation documents. Workshops to enable wide community involvement in the process were raised in the online discussion between the Minister and the Government Architect.*

The Lane Cove Bushland & Conservation Society has over almost 50 years of knowledge and experience to contribute positively to this process and requests to meet with you ASAP and participate in any workshops. This would give the LCB&CS a clear understanding of proposed legislation, before it is drafted, and the processes intended.

Thank you for the opportunity to provide comments on the draft documents. The LCB&CS requests a written response to the concerns outlined as well as the opportunity for further discussion and further input into this process.

Sincerely,
Shauna Forrest (President)
Lane Cove Bushland & Conservation Society