



5 Milner Street,
Hindmarsh SA 5000

Phone: (08) 7127 4630

Fax: (08) 82319773

Website: www.ncssa.asn.au

Sarah Elding
Project Lead State Planning Policies
Department of Planning, Transport and Infrastructure
Level 5, 50 Flinders Street, Adelaide 5000
GPO Box 1815, Adelaide SA 5001
DPTI.PlanningEngagement@sa.gov.au

Friday 21 September 2018

Re: State Planning Policy for Biodiversity

Dear Sarah,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the State Planning Policy for Biodiversity. Since 1962, the NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and management of protected areas.

We would like to take this opportunity to thank you again for the Drop In session 14 August 2018 where we discussed this policy. NCSSA now provides this further, written feedback regarding how the policy could be strengthened. As discussed at our meeting, as South Australia's primary nature conservation advocacy organisation, our Society would like to be further engaged in this process, both of the development of this policy but also the reforms to planning more broadly. We look forward to hearing from you as to how this might be possible.

In summary, NCSSA strongly supports the development of this State Planning Policy for Biodiversity and trusts that it will lead to greater emphasis being placed on protecting the biodiversity of our State in both our higher-level land-use planning framework as well as in the assessment of individual development applications. Whilst we attach specific suggestions for strengthening the policy on the following page, our Society's key concern is how the policy will be implemented. Particularly, we believe that the knowledge base currently held in South Australia about biodiversity needs to be improved and extended so that planners can make informed decisions with regards to its protection that will be robust to judicial review.

Please refer to the following pages for our specific comments on the State Planning Policy for Biodiversity. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at julia.peacock@ncssa.asn.au.

Yours sincerely,

Julia Peacock
Nature Advocate

NCSSA comments on the State Planning Policy for Biodiversity

Comments on the policy document

We believe that a policy on biodiversity should explicitly acknowledge the loss of biodiversity that has occurred since European settlement of South Australia, for example the more than 70 species that are thought to have become extinct and the fact that a quarter of all known vertebrates and terrestrial vascular plants are threatened with extinction. It should acknowledge that we are therefore starting from a position of debt, and as a community we are seeking to arrest and reverse this decline, rather than solely “mitigating the undesirable impacts of biodiversity loss”.

The draft policy is anthropocentric (focussed on the human perspective), listing the benefits to humans of biodiversity, where we believe it should also refer to the intrinsic value of nature. Particularly, it should state adherence to two long-standing and widely accepted conservation principles:

- the principles of intergenerational equity (that our generation has a duty to care for nature for the benefit of future generations), and
- the precautionary principle (that we don’t know exactly what the risks of biodiversity loss are, but they are likely to be negative, and therefore we are compelled to take action to avoid these risks).

It may also be useful for the policy to explicitly state that it addresses all biodiversity, rather than solely focusing on the threatened species and areas of high conservation value.

We strongly support the stated policy intentions of addressing cumulative impact and recognising the environmental values of modified landscapes. We also support the policy intention of protecting of critical habitat, though for clarity, it may be useful to specify that this refers to critical habitat for threatened species.

In addition to the commitments already within the policy, it should also require that future land-use planning and development in South Australia be undertaken consistent with the principles of Biodiversity Sensitive Urban Design (BSUD, Garrad et al. 2008 (**ATTACHMENT A**), Parris et al. 2008 (**ATTACHMENT B**)). This is an emerging field of thinking and research that seeks to incorporate existing ecological knowledge into a framework that can be used by planners. Additional commitments that need to be added to the policy to more fully reflect BSUD thinking include:

- a commitment to connectivity within urban environments for non-human species, suggesting it be considered in the same way that human citizens require opportunities for mobility within their cities,
- a commitment to actively constructing ecological features that will benefit biodiversity, such as green walls and roofs, and given the relative novelty of these types of structures, measuring their impact for biodiversity, and
- a commitment to design that encourages local community to care for, value and engage with areas of high biodiversity, as well as other green or ‘natural’ areas, and improve the potential for human-nature interactions.

In relation to this last point, we know the proportion of the human population living in urban environments is increasing and that our collective and individual connection to nature is suffering as a result. We therefore believe there should be an explicit commitment in this policy to planning our urban spaces in a way that supports people’s connection to nature with a specific view to fostering a culture of nature stewardship.

Comments on its implementation

Whilst NCSSA strongly supports the development of this policy, we believe the key barrier to its effective implementation is the current state of knowledge regarding biodiversity – both of threatened species and areas of high conservation value but also more common but nonetheless essential components of biodiversity. In order to implement this policy successfully, planners will need access to comprehensive and up-to-date information on biodiversity that will be robust to judicial review, to support both high-level planning and individual decision-making.

We suggest the following actions be pursued as part of the implementation of this policy:

- Development of specific guidance for planners as to how to interpret the policy, providing best practice guidelines and/or case studies where available
- Further specific consideration as to how the environmental values of modified landscapes will be quantified, as this is a newer area in conservation thinking and likely to be even more uncertain than for areas identified in the ‘traditional manner’ as being of high conservation value (e.g. reserved areas)
- A system of zoning that recognises and protects biodiversity, including connectivity and the environmental values of modified landscapes
- The incorporation of as much robust information about biodiversity as possible into overlays for the Design Code to guide decision-making, particularly identifying critical habitat for threatened species where it has been identified (or where it is thought to be, if no research has been done on a given species)
- The development of additional overlays that can reflect ‘grey literature’ in relation to biodiversity (expert opinion, isolated or unverified records, unpublished data, reports from agencies and interest groups, information gathered through EIS-type processes) that can act as a ‘red flag’ for planners to seek more information with respect to the biodiversity of particular areas or when assessing specific developments
- A robust process for the development of Regional Plans, incorporating specific conservation expertise and incorporating all available information on the region’s biodiversity, as this likely to be the main mechanism by which the cumulative impacts of development can be addressed. An option for achieving this may be strengthening the connection between Regional Plans and plans developed under the NRM Act (or its likely replacement, the Landscapes SA Act), and
- A specific program of work dedicated to the improvement of our knowledge biodiversity, particularly in light of the fact that it is needed for a range of state and national level legislation and processes, such as the development of the State of the Environment report every 5 years by the Environment Protection Agency and to identify priorities and measure the outcomes of investments made through the NRM Act

References:

Garrard GE, Williams NSG, Mata L, Thomas J, & Bekessy SA (2018), Biodiversity Sensitive Urban Design, *Conservation Letters*, 11(2) 1-10.

Parris KM, Amati M, Bekessy SA, Dagenais D, Fryd O, Hahs A, Hes D, Imberger SJ, Livesley SJ, Marshall AJ, Rhodes JR, Threlfall CG, Tingley R, van der Ree R, Walsh CJ, Wilkerson ML, Williams NSG (2018), The seven lamps of planning for biodiversity in the city, *Cities*, <https://doi.org/10.1016/j.cities.2018.06.007>