



Blue Mountains Conservation Society Inc.

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Nature Conservation Saves for Tomorrow

20 May 2013
The General Manager
Blue Mountains City Council
Locked Bag 1005
Katoomba, NSW 2780

SUBMISSION TO DRAFT *SUSTAINABLE BLUE MOUNTAINS 2025* STRATEGIC PLAN

The Blue Mountains Conservation Society supports the Vision, Key Directions and Objectives of this draft plan. We also congratulate the Council on their extensive consultation with the community on this plan and for the community forum in February 2013 which members of the Society attended. However, we are disappointed that Objective 6.6 ('The community is informed, consulted and engaged') has not been implemented in the development of the new Standard Instrument Local Environmental Plan.

The Society has some concerns about the draft strategic and delivery plans. We will confine our comments to the 'Looking After Environment' and 'Using Land' Key Directions.

General comments and concerns about *Sustainable Blue Mountains 2025* strategic plan

The Society welcomes the inclusion of a commitment to no Coal Seam Gas exploration or extraction. The Society is particularly pleased that a new objective (Looking After Environment 1.5) "that the community and all levels of government work together to protect the Blue Mountains World Heritage environment" has been included in the latest plan. We understand that provisions for protecting Blue Mountains World Heritage values are found in the current Blue Mountains Local Environmental Plans and the GBMWA Strategic Plan (2009). However, our general concern about this objective is that it is precisely the actions of the NSW state government in particular—through its insistence that the Blue Mountains adopt a Standard

Instrument LEP, and the development pressures the Blue Mountains will be subject to through the NSW planning system reforms and the Metropolitan Strategy for Sydney—that will compromise this objective and other elements of *Sustainable Blue Mountains 2025*.

Other elements of *Sustainable Blue Mountains 2025* that are under threat by the SI LEP and state government policies and legislation are the vision that “we have maintained the bush between our settlements” and all the strategies listed under Objectives 1.1 and 1.2 in Looking After Environment. These strategies relate to protecting and nurturing flora, fauna, ecological communities and habitats; conserving threatened species; limiting impacts of urban development impacts on the environment from weeds, urban runoff etc; restoring and rehabilitating degraded and disturbed natural areas habitat; and protecting the natural environment from pollution; protecting, maintaining and enhancing the health of the City’s natural waterway and water catchments; and identifying, conserving and protecting ground water resources.

We fear that housing targets set for the region in the Metropolitan Strategy for Sydney and the probable loss of the ‘Land Between Towns’ Protected Area and likely general degrading of environmental and village character protections in the new SI LEP for the Blue Mountains will utterly compromise *Sustainable Blue Mountains 2025*’s vision, objectives and strategies relating to Looking After Environment and Using Land. We also understand that the principles and practices of Ecologically Sustainable Development, found in LEP 2005, will not be carried forward into the new SI LEP. This creates an incongruity with the vision of *Sustainable Blue Mountains 2025* and its strategy (in Objective 1.5) of increasing community engagement, education and capacity for living sustainably within the Blue Mountains World Heritage environment.

Specific comments and concerns about *Sustainable Blue Mountains 2025* strategic plan

Looking After Environment. Objective 1.1, Strategy (b), p.28

- The strategic plan should commit to conserve **rare** and threatened species, not only threatened. Both current LEPs 1991 and 2005 theoretically give protection to rare as well as threatened species. Progress measures could include ‘reduce the area of bushland cleared or number of native trees cut down’.

Using Land. Ongoing challenges p.38

- Ongoing challenges include managing the impact of urban development on natural values e.g. rare and threatened species as well as ecological communities significant at national, state or regional level that are within the City as well as at the edge in the World Heritage Area. We also wonder if *Sustainable Blue Mountains 2025* contains any commitment to stop approving further developments in high fire risk areas.

Specific comments and concerns about *Delivery Program 2013-2017*

Looking After Environment. Operational Plan Actions, p.33

- The list of ecological communities targeted for restoration and weed control programs should include Upland Basalt Eucalypt Forest. This was listed as an endangered ecological community at national level in 2011. This community occurs in the LGA, including outside of the GBMWA.
- While habitat restoration is commendable, there should be a commitment by Council to stop the clearing or active degrading of significant natural areas through development and subdivision. All threatened (at state or national level) ecological communities within the City area should be protected. LEPs 1991 and 2005 give protection to threatened ecological communities as well as regionally significant communities as listed in their Schedules 3 and 5. LEPs 1991 and 2005 also give protection to threatened species and rare species. It would also help if Council committed to producing proper guidelines for assessment of flora and fauna impacts and take proper account of impacts on flora and fauna during DA approval stage.
- The Society is concerned that while *Sustainable Blue Mountains 2025* delivery plan makes a commendable commitment to implementing targeted habitat restoration and weed control programs within threatened ecological communities, Council's actions in other instances are working against this commitment. Constructing the Knapsack Reserve downhill bike track, which involves removal of vegetation in nationally listed endangered and critically endangered ecological communities, is a case in point.

We understand that *Sustainable Blue Mountains 2025* is an aspirational document but Blue Mountains City Council's actions should meet these aspirations here and now. The Blue Mountains Conservation Society hopes that the Blue Mountains City Council will work diligently,

in genuine partnership with the community, to realize the Vision, Key Directions and Objectives of the plan.

Yours sincerely

A handwritten signature in cursive script that reads "T. Cameron".

Tara Cameron

Vice President, Blue Mountains Conservation Society