



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: 0490 419 779

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

15 July 2025

Dr Rosemary Dillon
Chief Executive Officer
Blue Mountains City Council
Email: council@bmcc.nsw.gov.au

Submission: Feedback – Draft Biodiversity Conservation Strategy 2025 – 2035, Blue Mountains City Council

The Blue Mountains Conservation Society (the Society) supports the proposed actions outlined in the Draft Biodiversity Conservation Strategy and congratulates Council on the comprehensive scope of the strategy. The Society has made recommendations for improving some actions and the addition of others. We also recommended there are actions which deserve a higher priority and some which we believe need a more targeted focus to achieve better biodiversity conservation outcomes.

1. COMMENTS ON BIODIVERSITY STRATEGY

Resourcing

It is noted in the tables listing “Actions” the majority are identified as being resourced from within existing Council budgets, with some actions also identifying funding from external grants as well as existing Council budgets. On p106 and 107 the BMCS outlines how the Strategy will be resourced.

The Strategy states (page 106):

Actions within this Strategy are not likely to be fully achieved at current staffing capacity in the drafted timeframes. Council will seek to progress the strategy with existing resources by extending the implementation timeframe of the actions. Ultimately, the resourcing of the Strategy is a matter to be determined based on consideration of priorities within Council’s operations.

In the above statement the Council is acknowledging the current budget allocated to environmental and biodiversity outcomes is not sufficient to achieve the actions in the Draft Biodiversity Strategy. **This is of major concern to the Society.** The draft Biodiversity

Strategy cannot be implemented unless a sufficient proportion of Council budget is allocated towards its implementation. Otherwise, it will become merely aspirational and no improvements in biodiversity conservation will be achieved.

The Society has long advocated for an increase in funding for environmental programs within Council's budget. Over a number of successive years the Society has campaigned during Council elections to increase the percentage of the Council's environmental budget as compared to Council's overall budget.

The Society has undertaken a review of the Council's budget since 2019/20, based on figures published in Council's yearly Operational Plans (Attachment A). This review indicates that the total expenditure on environment related programs (Natural Environment; Natural Visitor Facilities and Water Resource Management) has **significantly declined in both real terms and as a proportion of the Council's overall budget**. In 2028/2019 the environmental related budget was \$11,809,000 representing 12 per cent of Council's budget while in 2024/2025 the environmental related budget was \$9,669,000 representing 9.7 per cent of Council's budget.

The Society cannot see how the Biodiversity Strategy can fully implemented without a significant increase by Council in real terms of total expenditure on environment related programs (Natural Environment; Natural Visitor Facilities and Water Resource Management).

The Society therefore asks that Council's environmental expenditure, commencing in 2025/26 Operational Plan, is increased to 13 per cent of Council's total budget. Our estimate is that this represents an approximate budget of \$13,000,000 on environmental related programs, which would provide a real increase in funding to enable the implementation of key components of the Biodiversity Strategy.

Reporting

The Strategy states on page 110 that "Results will be reported each year via Council's existing annual reporting process". **The Society believes this level of reporting is insufficient** and that the Biodiversity Strategy should be reported on annually via a separate report, including whether actions have commenced, been completed or delayed and have not yet commenced. A separate and detailed annual report is required given the importance of the Strategy to the community and given the importance of the Strategy in conserving the Greater Blue Mountains World Heritage Outstanding Universal Values.

Responding to International Union for the Conservation of Nature (IUCN) "significant concern" rating for GMBWHA conservation outlook

As discussed on page 78, the IUCN has rated the conservation outlook for the GMBWHA as being "significant concern". Climate change, bushfires and invasive plants and animals (including environmental weeds) have significantly contributed to this worrying rating. These factors are all interrelated. For example, bushfires and climate change-associated heavy rain periods foster the spread and development of environmental weeds in the GMBWHA.

Of course, BMCC is not directly responsible for management of the GBMWA. However, the BMCC local government area is a primary source of environmental weeds, and it is disappointing to see that Action Plan programs that might help to manage this situation have only received “Medium” ratings e.g. community biodiversity, environmental and (suggested) environmentally friendly garden education; a Connectivity Plan to facilitate climate change stressed wildlife movements within the Local Government Area. Therefore, the Society recommends that programs relating to environmental literacy and education should receive a “High” rating e.g. Action Plan items 15, 16

2. RECOMMENDATIONS FOR THE ACTION PLAN:

Priority ratings in Action Plan

There are no implementation criteria offered for the Priority ratings in the Action Plan viz. High, Medium, Low. What do these ratings actually mean? For example, do the ratings reflect current resourcing of the item, or its importance, or the anticipated level of financial support that will be offered, if any?

As no criteria are offered, it is concerning that many items in the Action Plan are rated Medium and Low priority. In fact, 49/60 (81%) of items in the Action Plan are rated Medium to Low priority.

No. 5 – The Society fully supports the review of both LEP and DCP to deliver improved biodiversity outcomes. We support this being a high priority area for environmental protection and management alongside any development to ensure the lowest possible environmental impacts.

No. 6 – The Society recommends using the NSW Department of Climate Change, Energy, the Environment and Water’s Plant Community Types (PCTs) database and other resources to assist BMCC vegetation mapping process. It is important in this process to prioritise Threatened Ecological Communities

No. 12 and No. 13 – The Society suggests that “low” and “high environmental value land” be defined and the definitions open for public comment. Whilst in principle it sounds appropriate to sell off low environmental value land the Society has a concern that high value land may be too restrictively defined. “High value land” should not only be land currently supporting recognised threatened vegetation communities or species. As biodiversity relies on the interrelationships of all indigenous species, bushland which is part of an area of sufficient size, or a connective corridor has value. Areas which serve as protective buffers and steeply sloping land may not be intrinsically of high value but the loss of which to development will cause degradation. Some degraded inholdings should be retained to allow for better management of the whole area. The Society supports the designation of high priority for the identification of high conservation value Crown Land.

No. 15, No. 16, and No. 17 – Rate as “High” priority (see previous note: Responding to IUCN “significant concern” rating for GMBWA conservation outlook).

These actions which propose educational/awareness-raising activities directed to residents lack credibility if Council continues to flaunt opportunities it has to “Value Biodiversity and Demonstrate Leadership”. Not only is the civic space in Katoomba (near the old library) planted out with exotics, but one of these exotics looks like a listed priority weed: viz the *Kniphofia uvaria*. Even if it is not the weed species, but a hybrid, it looks like it to the untrained eye, and this is not demonstrating leadership.

No. 18 – There is a need for a better developed threatened species and threatened ecological communities program that aligns with NSW state government program for identification of threatened species populations for better management and conservation outcomes on Council managed land, and within development proposals. Threatened ecological communities can be better identified with recommendations for action No. 6.

No. 20 – The development of a Connectivity Plan should be a high priority to enable actions of no. 12 and no.13 to proceed (both high priority). The Society recommends that high priority be given to developing a connectivity plan.

No. 23 – The Society very strongly supports giving a high priority to dealing with the threats created by Transport for NSW’s failure to undertake effective weed control along rail and highway corridors.

No. 26 – The Society recommends that high priority be given to support private landholders in biodiversity conservation. This action requires more resources. The Bush Backyards program is currently provided through part of one position. The time available to provide on-ground support for landholders has decreased over the years as more other responsibilities have been transferred to this position. Currently, there is no promotion of the availability of this service and therefore, any waiting lists significantly underestimate the need/demand. The native plant nurseries spend considerable time responding to questions about how to protect and restore private land, which really require site inspections and bush regeneration advice. However, they have difficulty in obtaining leaflets from BMCC to give customers about the Bush Backyards program.

No. 29 – The Society recommends that higher priority be given to updating the property policy to ensure high conservation value lands are not sold and also that this be expanded to lands important for connectivity and also protective buffers.

No. 34 – The concept of “Blue-Green Infrastructure” needs to be properly defined and explained for the community to understand.

No. 35 – The “high” rating is strongly supported.

No. 36 – The Society supports the development of an Encroachment Policy as a high priority but opposes it covering all Council managed lands. This policy has been promised in Operational Plans for well over 10 years. We recommend it be restricted to cover only Council managed natural areas and put on public exhibition immediately. Will this strategy be yet another failed promise?

No. 37 – For the Society to support an Urban Forest Strategic Plan, it would need to strictly contribute to biodiversity conservation. This would need to be implemented by only planting local native trees and shrubs and promoting the public to do the same. Planting and maintaining exotic species have limited biodiversity values and many are invasive or have the capacity to become invasive. It is an opportunity to promote biodiversity which should be used well.

No. 40 – The Society would like to see the development of a comprehensive Pest Animal Management Plan to control visible issues such as feral foxes throughout and the feral goats in the Katoomba/Govetts Creek catchment.

No. 42 – Council should be advocating for strategies in the proper use of all environmentally harmful pesticides not only anticoagulant rodenticides and should be focused on avoidance instead of “minimisation”.

No. 44 – The Society strongly supports this ambitious target to become “a Net Zero organisation by 2025”. An example of a hurdle for Council towards Net Zero is green waste being trucked to the Central West for processing, then back over the mountains for sales. The Society would like to see an investigation into alternatives to these types of unsustainable practices.

No. 48 – Bushfire mitigation activities should be designed to avoid impacts on biodiversity, not just minimise impacts.

No. 50 – The Society fully supports undertaking research into the impacts of concrete on the environment. The Society is working towards the introduction of policy changes regarding building materials in natural areas managed by Council, and in conjunction with NPWS managed land. Policy on the use of concrete in natural areas should be a performance measure for this action.

No. 56 and No. 57 – The Society wishes to see Council make a commitment to the immediate implementation of cat containment bylaws through advocating for amendments in NSW at State Government level.

No. 58 – Please define CAWS for community understanding.

No. 60 – Upgrading the priority for strengthening livestock management and compliance is critical in many catchments, such as in the Megalong valley.

PROPOSED NEW ACTIONS:

Bush Regeneration, Under Protecting and Restoring Ecological Integrity and Habitat Connectivity – The Society recommends an additional action, “Undertake bush regeneration works on all council managed bushland”. The annual resources directed to on the ground bush regeneration works appears to have declined since the Bush

Regeneration Team merged into a Natural Areas Team. The restoration and expansion of bush regeneration would clearly enhance the biodiversity on public land.

Pollinator policy, Under Protecting and Restoring Ecological Integrity and Habitat Connectivity – Council has previously supported a pollinator policy and previously indicated that such a policy would be included in this new Biodiversity Strategy. A well-designed “pollinator policy” will fit well with the BMCC’s stated delivery approach, i.e.: Lead, Inform, Collaborate and Manage. Such a policy would include provision of information to the community, collaboration with other organisations e.g.: NGOs, BMWHL, nurseries, schools, to education them on the importance of protecting and increasing urban protection of pollinators and providing suitable habitat for pollinators. Community members both private landholders and others, could be supported with small grants to convert areas of their gardens or landholdings to Pollinator gardens. Toronto in Ontario, Canada has an excellent pollinator protection strategy (<https://www.toronto.ca/services-payments/water-environment/environmentally-friendly-city-initiatives/reports-plans-policies-research/draft-pollinator-strategy/>) which could provide a model for BMCC to use. Council also can take the lead by leaving some areas on its own land as pollinator areas. Pollinators include many species of insects, birds, mammals and different garden structures or restored habitats could be designed for each category.

Volunteer Bushcare Program and environmental weed management

Page 25 of the Draft Biodiversity Conservation Strategy 2025 – 2035 commendably mentions that priority areas for biodiversity protection and restoration should be the management of environmental weeds and sensitive urban bushland interfaces.

However, the Action Plan makes no mention of council’s volunteer Bushcare Program, does not express support for it, the valuable role that it plays in the management of environmental weeds, and how it fosters healthy waterways by revegetation of riparian zones. The Bushcare Program is arguably the largest and most successful environmental repair and conservation program operating in the Blue Mountains.

The Society recommends that the BMCC Bushcare Program should be included in the Management of Urban Impacts, Healthy Waterways and Protecting Ecological Integrity sections.

Thank you for the opportunity to comment on the draft Plan. If you have any queries regarding this submission, please contact me on president@bluemountains.org .

Yours sincerely



Annette Cam
President
Blue Mountains Conservation Society
president@bluemountains.org.au