



For the Community

22 October 2015

RE: Comments on Council Biodiversity Strategy

Thank you for the opportunity to comment on Council's new Biodiversity Strategy. The fact that it now exists due to a new direction and effort of Council staff is to be applauded. It only remains to be seen how all the actions identified can and will be implemented.

The Association makes the following comments on the Strategy.

1. While not a criticism per se we think the Acknowledgement of Country reads a little more like an indigenous history and that perhaps the Council statement could be included to balance this somewhat. Also the 'history' infers that the country suffered no impact/change at all which is far from the truth, since science clearly points to multiple changes incurred over time not the least of which is loss of the megafauna which it is now believed was hunted to extinction by our early 'traditional owners'.

2. Definitions and Abbreviations - Page 6 - seek clarification re. 'including 'ne').

3. The Biodiversity Strategic Plan states five important objectives and includes responses and actions. However implementation of the Plan is still very short on policies which will see these come to fruition (Refer P. 10 Implementation). The urban footprint in Mt. Barker is about to increase by 1800ha so an appropriate response would be an indication (and supporting policies brought to Council) of the percentage of 'linked biodiversity corridors' which exist now and how it is planned to increase this (with regard to the 1800ha rezoning) in the near future, before all opportunity is lost to clearing of the land for housing, roads and road widening of adjacent roads.

An inspection of the areas undergoing development at the present time (SpringLake, Lanser, Wistow Park and others) reveals that trees are being felled in these developments in the rezoned area. Some of the trees are aged mature red and blue gum which provide habitat vital to the survival of many species. Apart from the aspiration that developers will set aside open space within which some trees will remain, how are the iconic old (100 years or more) trees to be protected and what is planned to provide succession (preferably by natural replacement) of the old trees?

4. Page 9 - "The strategy itself will adopt an adaptive management approach". This statement becomes a nonsense when we consider 'biodiversity' - since science clearly shows that the majority of species (especially small animals, plants, insects and birds) will not have time to 'migrate' elsewhere, nor will they have time to adapt to even a 1-2 degree increase in temperature, which not only impacts on breeding and longevity, but drastically affects food and water sources. So what does this statement mean? Adapt to less species? Or adapt to measures to increase and protect biodiversity? Clearly 'adaptation' is not an option for a large number of species (both flora and fauna), including the socially disadvantaged in our communities.

5. Any definition of biodiversity should be limited to the flora and fauna which this Strategy is designed to protect; clearly genetic diversity is a requirement for survival since once the remnant patches of habitat become too small and remote from one another then populations within each patch are consigned to in-breeding and then extinction - so having adequate patches of habit and preferably linking them to larger areas (e.g. along Creek lines and Mount Barker Creek and other tributaries in the Catchment) is the way of ensuring survival of any degree of biodiversity.

The definition of Eco-Services confines itself to exploitation of natural resources rather than recognising the many eco-services rendered by nature - down to the storing of carbon, extraction of pollution, cleaning of air and provision of oxygen provided by trees and shrubs (even grass) as well as being a vital part of the water cycle. These are the true 'eco-services' not mere harvesting of both renewable and non-renewable resources at an ever-increasing rate.

6. The mute acceptance of the figure of 41m people by 2056 reveals a lack of understanding of the limits to growth and the meaning of protection and enhancement of biodiversity (in nature). This implies acceptance of a 'swap' from flora and fauna biodiversity to mere biodiversity in one race (human) which is ludicrous.

7. P. 26 Discusses 'key pressures' while simultaneously stating that there is an "occasional seasonal over abundance of native species". If birds and animals move, it is more likely to be in response to loss of habitat due to urbanisation or agriculture or feeding opportunities created by human agriculture. The mention at 2.1.6 of Laratinga Wetland being an "artificially created wetland" does not recognise that this area in a valley alongside Mt. Barker Creek was always a swampy area with large damp patches surviving through most of summer. This is well recorded - along with the species which once frequented the area (e.g. Chestnut breasted landrail, no longer there).

The mention of 5 migratory birds listed under the EPBC Act, 19 State threatened bird species and 17 further bird species considered endangered in the Mt. Lofty Ranges (160 sp. recorded over last decade) should set alarm bells ringing and trigger new policies for implementation of the Council Biodiversity Strategy, lest it be considered mere 'motherhood' statements.

8. 3.1 Human Health and Social Benefits - only mentions provision of activity for birdwatchers and links with art and religion. What about the vast number of eco-services provided by birds such as maintaining a balance in the insect and reptile world. The number of mosquitoes breeding each year in Laratinga (and other wet spots) is moderated and controlled by our populations of small birds and reptiles. Other eco-services and synergies exist wherein ants are rewarded with food parcels by many species of eucalypts and the ant in taking away the food parcel serves the tree by planting new seed at a distance from the parent tree. There are thousands of such 'nature services'.

9. Mention is made of more than 300 native animals requiring tree hollows, including the locally vulnerable Yellow-Tailed Black Cockatoo - yet there is no plan in place to protect all trees with hollows (many old trees have dozens of hollows). Bees, native bees, possums, multiple bird species and reptiles all compete for hollows to ensure survival, especially in the cold winters and very hot summers of our district.

10. Page 68 - again refers to 'overabundant species' - this again is caused by human pressures and a solution is readily found in a plan which would ensure corridors of suitable trees leading out of town to link with other remnant patch habitat and (hopefully) protected creeklines and conservation areas.

11. P. 68 - Fauna sensitive road design - in urgent need of investigation since conversely many of the local roads on the outskirts of Mt. Barker and other towns have been widened, straightened and greatly increased traffic speeds and the consequent loss of wildlife. This idea should be pursued as a

high priority. Light and noise pollution also needs to be considered in relation to wildlife (probably accounts for a large number of wildlife deaths at night).

12. P. 85 Mentions a monitoring site on Mt. Barker Creek just below Adelaide Road. Another (private) monitoring site exists at the bridge on Williams Road and more water monitoring needs to be done to ensure connectivity of Mt. Barker Creek and its relationship with Laratinga Wetland (in good times and bad).

13. P. 104 Vegetation Associations east of Wellington Road - these are important and are threatened with future urbanization and industrial/commercial development. Need a plan in place and policies which will protect such vegetation (note that some of this vegetation is immediately behind a recent built development (Gilbert) on the eastern side of Wellington Rd.

14. P. 119 and P.122 Endangered and threatened fauna maps/lists. Note that the Yellow-Footed Antichinus has been reported east of Mt. Barker (Harper Road) and on Stamps Road, Bugle Ranges. With regard to vegetation associations and many remnant species (albeit sometimes mixed with other Australian native species) there is an urgent need to protect roads such as Native Ave., Hunt Road, Barker Road (where many Allocasuarina trees have been removed in the past year by neighbouring landowner, Sims Rd. Williams Rd. Harrop and Harper Roads. There is no mention of Harper Road (eastern boundary of the MDPA lands, despite it being rated of 'high conservation value'. Thompson's Fire Track (continuation of Blight Reserve Road) is also worthy of protection, with many fine examples of remnant native grasses.

15. P. 128 migratory species - action needs to be taken on assumption that these exist (or may in future visit) to enhance this opportunity to increase biodiversity, rather than losing it.

16. P. 131 Roadside vegetation (see above at no. 14). Why not initiate a scheme whereby local landowners are encouraged to retain and better manage roadside vegetation (they are responsible for it!) and do complementary revegetation work on property adjacent good roadside vegetation to encourage wildlife 'off-road' into a safer zone.

17. P. 136 "low levels of remnancy displayed within the MDPA lands reflect damaging impacts of farming practices since European settlement" - yet it should be acknowledged that farmers in this area (MDPA lands) retained hundreds of big eucalypts and thickets of vegetation as shelter/shade for livestock and biodiversity which is known to increase the fertility and production of agricultural land. There is also a need for signs regarding the illegal nature of removing roadside vegetation - each autumn the area resounds to the scream of chain saws removing timber from roadsides.

18. P. 148 states that Sims Road contains scattered euc. camaldulensis and highly degraded understorey. No mention is made of the large number of Allocasuarina verticillata and Acacia pycnantha removed in 2013 by council contractors. The roadside needs replanting (although some of the She-Oaks removed were more than 100 years old) not downgrading due to recent deliberate damage.

19. P. 152-P154 need to formulate policy to protect MDPA lands, create wildlife corridors (permanent) and identify areas which should be preserved and not developed or suffer road widenings.

20. P158 18 groups named as potential Council 'partners' re achieving positive biodiversity outcomes - add local landowners and formulate working groups and action plans at the local level.

21. P. 160-163 Actions need to be embedded in policy - especially re. P. 162 7.0 Monitoring and evaluation and the establishment of a permanent environmental/biodiversity reference group for

biodiversity planning and actions at local level. Theme 7 - Sustainable Development (no page numbers in this section, 164-170?) - an urgent need for policy which requires examples of low energy, sustainable housing in every new housing development and in all urban regeneration projects in the district. The cost of energy saving in a house at the construction stage is a fraction of trying to retro-fit something later.

There is a pressing need for policies to be formulated which ensure the excellent work and action plans in this Council Biodiversity Strategy are not lost but make Mount Barker a stand-out example for increasing greenhouse gas emissions and advocacy of truly sustainable, low-energy housing.

Thank you once again for the opportunity to present this submission to you.

Yours sincerely

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