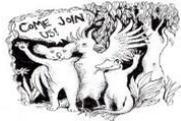


# The Future is the Natural World



“Biodiversity loss is the most significant environmental problem facing Australia”  
Professor David Lindenmayer. (2007) “On Borrowed Time”

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Dear Director of Planning Legislative Reform,

The move by DPIE to Reform Rezoning is applauded. However, exhibited materials must enforce and propose protection of “biodiversity conservation” and mitigation of “climate extremes”. As we are running out of time to address these two existential problems, new approaches to re-zoning must involve conservation and protection. Reform must prioritize updating the planning system. Eco-literacy is essential since the forces of climate extremes (bushfires - floods) and biodiversity loss (native soils – vegetation), which now govern our new future, are not yet understood.

We have seen that the development industry and the NSW State political system are weak in long-term matters that should underpin policy and legislation. At the same time the wider public and agencies consulted with by planning – do not understand the urgency or the seriousness of global biodiversity collapse and climate extremes.

Therefore, developers and the community (the public) have to be TOLD these urgent matters by Government policy makers and Ministers, planning directors and the public service ... but if Government itself doesn't know the facts – Society and the Economy are indulging in “air-conditioned” decision-making. [Outside air-conditioned buildings - there is no longer future certainty in changed biodiversity and climate regimes.](#)

Unless the reform of planning includes new graded E5 zones, tailored to protect natural and built assets of last environmentally sensitive areas (ESAs), the current “new approach” will be inadequate and not fit for future purpose.<sup>1</sup> Rezoning must be geared towards a Biodiversity Strategy, to protect ecological integrity & provide wide Ecoliteracy ....

I also refer to my submission re the precautionary principle in ESD planning and the proposed civil and civic test of a Transition Town in a location of double sensitivity (multiple public spaces of note and multiple near-to-station rare urban forest remnants), occurring together in the test location (submission to M. Ray & T. Harrup January 2022).

## 1. Criticism of exhibited materials:

- It is good the Planning Dept. has put out a Discussion Paper on a new approach to re-zonings [Discussion Paper: A new approach to re-zonings](#) but a search reveals there is either no mention or not enough or no discussion of biodiversity and climate.
- Further, the new webpage also makes no mention of biodiversity and climate. <https://www.planning.nsw.gov.au/Policy-and-Legislation/Under-review-and-new-Policy-and-Legislation/A-new-approach-to-rezoning-in-NSW>
- This raises the question: has industry and public briefing been influenced by DPIE staff **un-awareness** of: (a) the urgency of climate change and impact on economy and society, (b) even more importantly, of the rapid decline in vegetation remnants and seriousness of biodiversity (life-support) collapse in NSW - and (c) that [policy-makers need to know we don't have time?](#)
- How can a department Reform Re-zoning, without considering existential and life-supporting basics in policy & legislation? [William E. Rees: The Enigma of Climate Inaction – On the Human Nature of Policy Failure](#)

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<sup>1</sup> Thanks to Ku-ring-gai's General Manager there is now an Urban Forest Strategy. However, to action the Strategy, the zoning system must update its Master-planning, and apply new E 5 zones for new-age protection and advanced landscape conservation. The Transition to ESD proposed in the Major Project “Can we save our last best forest?” is a civil security effort - needing protection and conservation of eco-systems. This is not currently supplied by the planning system. Economy and Society depend on Environment.

## **2. We are running out of Time**

Since exhibited materials reveal no in-depth debate on “biodiversity” and “climate” - discussion on policy and legislation misses the point that we are entering a completely new State of Environment called the Age of Environmental Breakdown. Most SEPPS only mention Biodiversity & Climate in titles of legislation. [Minister's principles mention biodiversity once in a heading, and climate gets no mention at all !](#)

Yet, the fact is Government has responsibility to INFORM and TELL both public and developers, because re-zoning reform should be based on Australia's biodiversity and climate reality. Part of the re-zoning reform should be a greater sophistication in E Zones – and the E5 zone (see Marcus Ray/Trish Harrup submission) can be tailored to provide the protection and conservation suggested. More information is available from this research.

Not only will current reform perpetuate a planning process that is alien to the land, but by rezoning land for development which is habitat for other than human species, or pouring too much concrete in places it should not ... the system allows developers to use arguments based on land-banking and biodiversity offsetting. These processes create building rules that are flawed and out-dated for the time and place – and re-zoning will entrench the status quo.

The implications for re-zoning are serious, as shown by current zoning of the proposed TTT – no matter where we live – rich or poor - everyone everywhere (developers included) must both mitigate the effects of Biodiversity Breakdown and Climate Extremes - and adapt at the same time. It's no longer either – or but as [Scientists Warn “It's Both - And”](#)

## **3. Eco-Literacy and Eco-centric Perspective**

Without public & developer Eco-literacy & Eco-perspective – Reform of Re-zoning will fail the future. However, as the publically exhibited documents show - the Department appears to be both ecologically unaware and consulting with a public that is also [unaware of the reality of Australia's true crisis.](#)

This Research offers alternatives and solutions but to allow that to happen a Transition must be tested in a location that has significant built and natural assets. The Department of Planning needs to become aware of the “conservationist approach” to collaboration between citizen science and the new business of biodiversity.

In the new approach to re-zoning *government must ensure Protection becomes the Business.*

Reform is almost meaningless, if those driving re-zoning reform don't have ecological understanding. Why? Because only 250 years ago the entire country/state/urban area was native vegetation ...and the most unique fauna and flora and humans. [Today that Ecology has been disturbed by Economy.](#)

## **4. Re-zoning is a Key Threatening Process (KTP) without the feasible adoption of New Concepts.**

As shown by what is happening - current re-zoning is a Key threatening process for native fauna and flora. It is pushing last environmentally sensitive areas (ESAs) such as the proposed Transition Town into more and more unsustainable synthetic grass, bitumen and concrete.

Without new fundamentals, and new concepts, there is no true change. The new approach to re-zoning as exhibited could easily be hijacked by the developers and the un-informed planning system.

Local Governments are closest to the Environmental assets that need protection, and protection must now become the Business U-Turn needed for biodiversity conservation and climate mitigation.

The Planning Department and must now convince developers and the development Industry that THEY need to accept different perspectives and new concepts. Government is not a “client” – as the current NSW Master-planning advisory note says it is. <sup>2</sup>

Government has to create the change. As in the proposed Transition Town new concepts can be tested ... but only if the old antiquated re-zoning system is scrapped to stop the cumulative destruction of built and rare urban biodiversity.

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<sup>2</sup> This Government Planning document does not mention biodiversity at all – nor does it talk about climate extremes that exist out-side air-conditioned offices. While it does refer to landscape from an architect's perspective – this landscape consideration needs to be from an ecologist's perspective <https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/other/advisory-notes/advisory-note-overview-master-planning-process-2018-09-12.pdf>

## 5. Solution is in rapid Transition to ecologically sustainable survival economics (ESSE).

New concepts need to be tested in the Natural World, and become routine consideration in the Planning and Re-zoning system. Transition to new concepts should happen - before we irreversibly lose environmental baselines, cultural identities and iconic fauna and flora “found only in Australia”<sup>3</sup>

Critical Biological Infrastructure (CBI) must be both created - and protected. CBI must become part of a re-defined Ecological Green Grid. State significant infrastructure (SSI) is a “Major Project to save critically endangered ecological communities in rare Urban Forest”.

Advanced Landscape Conservation, Business of Biodiversity, Cumulative Impact, Divestment from Denial Economics, Extinction Debt removal and other new ideas need to be taken up - or the exhibited New approach to re-zoning will entrench our current problems – making the future even more dangerous than it is.

## 6. Planning must divest itself of old ways and move with the times.<sup>4</sup>

New E5 zone Protection needs to be tailored. As described to Marcus Ray and Trish Harrup the Planning system's Protection is provided by 3 E-zones, but zones to Use are five times that. There can be no Protection Strategy for an ESA with out-dated re-zoning. E5 & other E zones secure corridor integrity for environmentally sensitive areas (ESAs).

Urban land	Land in the Sydney Metropolitan Area (excluding Wollondilly and Blue Mountains Local Government Areas) and zoned for urban purposes as follows:
	RU5 Village
	R1 General Residential
	R2 Low Density Residential
	R3 Medium Density Residential
	R4 High Density Residential
	B1 Neighbourhood Centre
	B2 Local Centre
	B3 Commercial Core
	B4 Mixed Use
	B5 Business Development
	B6 Enterprise Corridor
	B7 Business Park
	B8 Metropolitan Centre
	IN1 General Industrial
	IN2 Light Industrial
	IN3 Heavy Industrial
	IN4 Working Waterfront
	SP1 Special Activities
	SP2 Infrastructure
	SP3 Tourist
	RE1 Public Recreation
	RE2 Private Recreation
	E2 Environmental Conservation
	E3 Environmental Management
	E4 Environmental Living
	W3 Working Waterways

More information is available from this Research.

## Conclusion

ESSE creates a sustainable restoration & protection approach to re-zoning. This goes to the heart of the Economics of Biodiversity that is globally now accepted to be the only available option since we have left it so late to act.<sup>5</sup>

A new approach to re-zoning (but much more ecologically cultured than those proposed) is urgently needed to deal with extinction debt, baseline shift and restoration of ecological integrity, by E-zones. E5 zones should be tailored and graded to protect and restore corridor ecology.

With good wishes,

Janet Harwood

IPBES Stakeholder

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Please email [REDACTED]

<sup>3</sup> [The story of protecting Kosciuszko is “about what it means to be Australian”.](#)

<sup>4</sup> <https://www.smh.com.au/national/billionaire-mike-cannon-brookes-banks-on-turning-australia-green-20220225>

<sup>5</sup> As we have left it so late to act, it is not just wildlife heading for extinction – this is an in depth explanation that all planners should be required to watch and relate to their decision-making. [https://www.youtube.com/watch?v=pukN\\_S-EsH8](https://www.youtube.com/watch?v=pukN_S-EsH8)