

PROTECTING VICTORIA'S ENVIRONMENT

BIODIVERSITY 2036

MANNINGHAM CITY COUNCIL SUBMISSION – MAY 2016

Introduction

Manningham City Council Officers have prepared a response to the public consultation draft Plan 'Protecting Victoria's Environment – Biodiversity 2036' (the Biodiversity Plan). As the consultation period has not aligned with Council's meeting cycle it will not be possible for this submission to be formally considered by Council until its meeting on 31 May 2106, after which Council's formal submission (with or without changes) will be submitted.

Manningham applauds such a thorough and honest document which addresses most of the key threats and challenges of managing and enhancing biodiversity for the future in the state of Victoria.

As one of Melbourne's 12 Green Wedge Councils, Manningham has a particular interest in the Plan as the municipality contains areas of state, regional and local environmental significance with rare and threatened species of botanical and zoological importance. Manningham also includes part of the environmentally significant Yarra River Corridor which includes the Yarra Valley Parklands and Warrandyte State Park, as well as many significant areas of native vegetation on private land.

The following submission responses are structured according to the format of the Plan and the requested feedback on 26 specific questions.

Section 1 & Section 2

Manningham Council supports the draft Plan's identification of the values of Victoria's biodiversity and the challenges that we face in conserving biodiversity into the future. In particular we strongly support the identification of the need to:

- *radically increase our efforts and investment in actions such as private land conservation, and*
- *take stronger action to reduce threats to biodiversity on public land.*

Manningham Council acknowledges that under climate change we may not be able to save everything. However, we advocate openness and transparency when decisions are made to

no longer attempt to save a species. We note that DELWP's position is very different from Zoos Victoria's 2014-2019 Wildlife Conservation Plan:

We are committed to the recovery of 20 native threatened species all of which require urgent conservation intervention. We've promised that no Victorian terrestrial vertebrate species will go extinct on our watch. This is an enormous but necessary undertaking and will require Zoos Victoria to work through strategic partnerships whilst mobilising community support.

We question that if Zoos Victoria can set such a visionary goal, why can't the State Government set a similar goal?

Manningham has concerns with the data that is shown within Figure 2 (Estimates of relative changes per year of native vegetation in Victoria) and questions the accuracy of the information shown. As far as we know, there has been no accurate tracking of loss of native vegetation through exemptions, or through unpermitted clearance. However, Manningham has conducted some monitoring of illegal and 'permitted' vegetation loss in the past and requires funding to continue the study of the ongoing vegetation losses over the past five years.

This issue has been covered in Council's response to the *Review of the Native Vegetation Clearing Regulations Consultation Paper*. There has also been very limited tracking of the removal of native vegetation for planning permits which have not been referred to the State Government. This may lead to significant under-reporting of native vegetation losses under the permitted clearing system. Furthermore, it remains unclear if native vegetation offsets are actually achieving gains in habitat hectares, given that habitat hectares have also been inconsistently tracked.

The impacts that climate change will have on Victoria's biodiversity need to be specifically communicated and brought into the climate change debate.

Section 3 – A Fresh Vision for Victoria's Natural Environment

Question 1 – What do you think of the proposed goals and objectives of this plan?

Goal 1 – 'To encourage more Victorians to value nature'

Manningham supports the draft Plan's vision and goal of encouraging more Victorians to value nature and ensuring that Victoria's natural environment is healthy, valued and actively cared for. This is extremely important because 'if people appreciate nature they are more likely to be motivated to protect it' (Arne Naess – Deep Ecology).

Manningham strongly agrees that it is important to have the backing of the public and the political structure, as this ensures that the steps needed to protect and improve biodiversity are able to be funded and maintained. However, the two goals need to be independent as it is vital that Goal 2 is achieved to meet our existing national and international obligations for the conservation of nature. It will be much more likely to achieve Goal 2 if Goal 1 is being implemented.

Manningham supports the objectives for Goal 1, especially increasing the number of Victorians acting to protect nature. However, the word 'nature' in this context needs to be defined, as many people consider a manicured garden with a tree as 'nature', which will not necessarily translate to the general community wanting to protect indigenous biodiversity. Is it achievable to expect all Victorians to connect with nature daily?

Manningham recommends that the opportunities to promote spending time in nature are in low impact activities which generate biodiversity knowledge and care. Melbourne's Green Wedges are important areas for exposing the large populations of Melbourne to healthy biodiversity, along with local conservation reserves and parks.

Further clarification is required regarding which Victorian organisations are envisaged to increase their reporting on environmental performance (i.e. Government, community, business, environmental). Many non-environmental organisations are the ones that cause the greatest environmental impact and reporting of environmental performance by these organisations must be included if the Plan is to achieve this goal.

Goal 2 – 'To ensure that Victoria's natural environment is healthy'.

Goal 2 is supported by Manningham, however, this goal should be the highest priority. Therefore, it should become Goal 1 and '*To encourage more Victorians to value nature*', should become Goal 2.

In order to be able to measure this Plan's success, the term 'healthy' in this context needs to be clearly defined and measurable and needs to include resilience. Victoria's biodiversity needs to be managed as a whole 'eco-system' and not just for individual high profile species. The Plan also needs to include and raise awareness of the importance of soil biodiversity and soil health.

Manningham supports the aspiration that '*Victorians understand that their personal wellbeing and the economic wellbeing of Victoria are dependent on the health of the natural environment.*' This is important for Victorians to understand, as the current focus would appear to be the economic wellbeing of State, ignoring the strong link and vital importance of personal wellbeing and protecting the natural environment.

Manningham also supports the Plan's **Vision** that:

'Victoria's Biodiversity is healthy, valued and actively cared for.'

Manningham particularly acknowledges the emphasis on, '*actively cared for*' which is important to ensure a proactive approach to implementation.

Manningham would like to ensure that the measurable objectives within page 25 are made specific enough to be measurable. 'Increase' can mean different things to different people. The targets that will be set under this Plan need to be SMART – Specific, Measurable, Attainable, Relevant and Timely. Local Government and the public should have the opportunity to feed into the target-setting program.

It is also important that more detail is included on how the vision and objectives will be achieved and resourced.

Question 2 – What might they mean for you personally and professionally?

N/A

Question 3 – What might they mean for the organisation that you represent?

The Plan's proposed goals and objectives will assist Manningham as an organisation by increasing the profile of environmental issues and the importance of protecting Melbourne's Green Wedges, as well as reinforcing the importance of the non-urban area of the municipality.

The Plan will provide stronger state government direction to support Local Government action and could assist in making the health of the natural environment and biodiversity a 'mainstream' concern. Therefore, these goals could assist in making everyone more accountable and ensure that impact assessments for all projects include the consideration of the natural capital.

It is possible that the Plan may ensure more environmentally appropriate future development. In addition, the Plan's goals may facilitate increased funding for the natural environment to ensure that existing reserves are managed appropriately and that future reserves can be created and managed. It will also assist Local Government in helping our communities to protect conservation values on private land.

The valuing of our natural environment may mean that the community collectively has more pride in our natural heritage which will create an atmosphere of engagement and enjoyment with the natural environment.

The goals and objectives can act as catalyst to better protect our natural assets, and for the community as a whole to develop a better understanding and a better connection with them. The Plan contains opportunities to link research about the benefit of natural areas to human health and wellbeing. These links must be made before local biodiversity is largely lost in urban and peri-urban areas such as Manningham's Green Wedge.

It is important that any surveys conducted to determine visitation rates for conservation reserves and waterways not only measure those managed by state agencies but also those managed by Local Government. These local conservation reserves and waterways are the ones that most people visit on a daily basis or weekly basis.

Question 4 – Do you support the approach to target setting that focuses investment efforts on places in the landscape where the most cost-effective actions are possible?

Manningham cannot comment on the approach until we have seen the new model created by the Arthur Rylah Institute for Environmental Research which seeks to determine cost effectiveness. In principle this approach is supported, but Manningham suggest that Local Government, relevant university academics and the Victorian Environmental Assessment

Council be involved in setting targets and how a transparent process is to be conducted. University research partnerships need to be funded and established to assist with short and long term study in this area.

Local Government plays a key role in funding conservation activities on public and private land. It also plays an important role in creating connections between public land and community participation in conservation programs and therefore needs to be actively engaged with the implementation of the Plan.

Any target setting should include all spatial scales: a species with habitat within a small urban area supported by an active passionate community should not be disadvantaged by a landscape scale approach. Many species common or threatened rely on reserves of all spatial scales from small Council reserves, to wider habitat ranges like Warrandyte State Park.

Section 4 - Principles of Protecting Victoria's Environment – Biodiversity 2036

Question 5 - What do you think of the principles of this plan? Which ones make sense, which ones do not?

Principle 2 needs to include that humans are also part of the ecosystem and depend on it for the most basic human need of oxygen. Soil biodiversity and soil health are also vital to supply the nutrients we require in our food. It is also important to include the significant 'spiritual' value that the natural environment provides.

Manningham has concerns regarding the use and consistency of some of the terminology used in the principles and throughout the Plan.

For instance, there are numerous examples of species persisting, perhaps thriving, in highly 'unnatural' or modified areas. Owing largely to habitat degradation and pest animals, some species now rely more often on modified environments that would not meet the definition of native vegetation under the Permitted Clearing Regulations. There are species that rely on non-indigenous tree species or survive on farm land or in modified dams. There are also many species that are being supported in areas that are unlikely to be classified as 'in the wild'. This digression from 'healthy habitats' must also be acknowledged within the principles.

Manningham supports the acknowledgement of intrinsic values in guiding the Plan. More work must be done to enable Local and State Governments to add weight in decision-making for intrinsic values alongside those values that are considered to have obvious social or economic benefit.

We are highly unlikely to ever have 'complete' data. As such, Manningham strongly recommends that the third dot point in the eleventh principle should be reworded to read: 'we will consider the limitations and uncertainties while continually improving our knowledge.'

Question 6 – Is it the right mix of principles to guide the plan's implementation?

The 'living systems' principles as need more weight in the Plan. For example, there needs to be a qualitative statement regarding managing biodiversity to maintain and improve the 'extent' and 'quality' while increasing the available resources.

Manningham acknowledges that for some species, biodiversity protection can now only happen in 'non-natural' environments and that there are opportunities to bring species back into non-natural environments (e.g. street trees, parkland, gardens). We recommend that the Plan recognise this and include opportunities to manage species in this way.

Question 7 – What principles might be missing from this plan?

Knowledge Principles

The statement under the knowledge principles appears to be incomplete. Manningham recommends stating what it is that we value about the knowledge.

Manningham recommends that a separate statement be included under the knowledge principles: 'we will continue to improve and invest in knowledge improvement'.

Living Systems Principles

Manningham recommends adding a qualitative statement regarding managing biodiversity to maintain and improve the 'extent' and 'quality' of native vegetation and fauna habitat.

Section 5 – Healthy Environment for Healthy Victorians

Question 9 – What does a healthy environment look like to you?

A healthy environment is one in which the landscape and waterways support a balanced diversity and abundance of naturally-occurring indigenous flora and fauna species, where natural functions can occur unhindered to provide vital ecosystem services that are critical for life, such as oxygen production, flowering, pollination, fruiting and seed set, carbon storage, nutrient cycling, healthy soil biota and water purification, which also means healthier people. A healthy environment is not overrun by pest plant and animals that impact on ecosystem function, nor is impacted upon by polluted stormwater and litter.

Healthy environments include a diversity of ages and vegetation types in a landscape-scale mosaic that provides hollow, links, corridors and stepping stones. These enable movement of animal species (and the seeds and pollen they carry) to ensure successful plant and animal breeding with diverse population genetics, and provide opportunities for fauna to escape wildfire or floods that occur at natural intervals and intensities. The functional health of such biolinks and islands is critical to species resilience and adaptability.

Question 10 – What do you think the barriers are that prevent some people experiencing nature and utilising parks and open spaces? What could you, your community or the government do to encourage and provide more opportunities for all Victorians to spend more time in nature including disadvantaged parts of the community?

Manningham supports the draft Plan's objective to 'increase the number of Victorians spending time enjoying nature'. There are well-established health and wellbeing benefits from contact with nature and community activities, such as organised tree planting and citizen science programs which also contribute to conservation efforts, build knowledge and increase community connections and custodianship. In the longer-term, community connections and custodianship facilitate the efficiency and efficacy of government environmental management, resulting in vastly improved environmental outcomes.

There are various barriers that prevent people from spending time in nature and enjoying their experiences. Further research into the socio-environmental drivers is critical for programs to achieve real outcomes, however there are several known barriers, including:

Lack of time: People are busy. Long hours and weekend work can make it difficult to prioritise spending time in nature especially if this requires significant travel time to get to a park or reserve. Providing opportunities to spend time in nature closer to home or work could reduce these barriers.

Risk: Some people are fearful of the natural environment and the risks, for example snakes, falling branches, fire and insects. Providing educational material based on fact to address common misconceptions is critical. Risk aversion in government can restrict the types of activities and initiatives that encourage the utilisation of parks, bush areas and open spaces.

Cultural and language barriers: Unless information on the natural environment is provided in multiple languages, it may remain inaccessible to many Victorians who do not have English as a first language.

Poorly maintained natural areas: If natural areas, especially in urban areas and 'points of contact', are poorly maintained and have poorly maintained or limited facilities, they may be seen as undesirable.

Perception of nature as inappropriate in the urban context: Some community members equate nature in the cities with brush tail possums and gum trees dropping leaves and branches. People need to be persuaded of the value of biodiversity in urban areas and the diversity of species that are worthy of protection.

Social: There is a trend towards a focus on structured organised 'indoor' activities and a lack of awareness and research regarding the benefits of spending time in nature.

Lack of Resourcing: Lack of resources for community engagement and custodian programs.

Manningham already provides opportunities that enable the local community to spend time in nature. Unfortunately with financial constraints, some of these activities could be reduced in scope or discontinued in the future.

Beyond Local Governments activities, other ideas for encouraging Victorians to spend more time in nature include:

- Promoting and supporting bushwalking and walking clubs and other groups that offer programs in the natural environment. NGOs such as the Victorian National Parks Association (VNPA) offer diverse weekly walk program that caters for all levels of interest and ability.
- Reaching out to Culturally and Linguistically Diverse (CALD) communities by providing CALD rangers or education officers and brochures in languages appropriate to communities represented in the area.
- Restoring funding to Parks Victoria and Committees of Management for State-owned land including rangers, facilities, walking tracks, programs and interpretation that enable people of all abilities and level of engagement to experience the natural environment and our unique flora and fauna.
- Allowing opportunities for people in cities and large towns to interact with nature - workshops, walks, citizen science, bio-blitzes, native vegetation displays (e.g. the grassland display on the State Library steps).
- Encouraging nature play programs for families and 'green gyms' to appeal to fitness fanatics.
- Promoting ways that people can get involved.
- Providing natural areas as settings for festivals, events, and cultural activities such as music or theatre and activities such as mushroom collecting.

Question 11 – How can we raise awareness of biodiversity across the community?

There are various ways the Victorian Government can support its own agencies and other stakeholders to raise the level of community awareness of biodiversity.

Communication

- Providing clear and consistent messaging about the importance of protecting Victoria's biodiversity across the various Victorian Government departments and its agencies.
- Tapping into various media (print, digital, and social) to share stories about biodiversity in Victoria and places to experience nature, or how to get involved.
- Sharing resources such as Park Notes and mapping programs between State and Local Government, so community members see consistency in biodiversity management information on public land across the state.
- Using iconic species to promote the natural environment, connecting nature and community through photography.
- Using interesting and engaging science communicators to share stories and make information and research stories easily accessible to the general community. It is vital that stories are shared that make the link between biodiversity and ecosystem services that support life.

Prioritising biodiversity protection in land-use decision-making and planning schemes

- Currently, the native vegetation clauses in the Victoria Planning Provisions permit the removal of natural vegetation from particular areas and offsetting that vegetation elsewhere. This sends mixed messages to the community about the importance of biodiversity, and how the Victorian Government values natural vegetation, especially in urban and peri-urban areas. It also reduces opportunities for communities close to the loss site to connect with nature, disadvantaging the community and further eroding the values that community place on vegetation. In turn, this often results in increased vegetation removal. Manningham recommends that bioregional offsetting be reintroduced.
- Strategic planning of open spaces should consider the role of 'natural places' as well as active and passive open spaces.
- Strategic planning should require new developments to incorporate nature (indigenous plantings, water sensitive urban design) into developments.

Supporting community action

- Community groups and networks that are actively protecting biodiversity or engaging the community should be supported (and resourced). These groups include Landcare and 'Friends of' Groups that build skills and leadership in the community.

Embedding an appreciation of nature from a young age

- Children are naturally curious and have no preconceived ideas. Values learned early on often remain with children as they grow older. Great starting places are bush kinders and nature play, and resourcing Junior Ranger programs in Victoria's National Parks. Some schools use totem species of flora and fauna to spearhead their biodiversity activities. While the Victorian Government is to be applauded for continuing to fund Resource Smart AuSSI Vic, it needs to ensure that primary and secondary science curricula address biodiversity in the Australian context, in Australian classrooms and beyond.

Embedding an appreciation of nature through life-long learning

- All university degrees should include elements of sustainability education and biodiversity education.
- Libraries should have adequate funding to run activities at relevant times such as 'biodiversity month' and have ID books on local species to borrow.
- Culturally and Linguistically Diverse (CALD) groups should have opportunities to connect with and understand the natural environment.
- Government-funded environmental research should be free and publicly available.

Section 6 – Linking our Society and Economy to the Environment

Question 12 – What are you currently doing – personally and professionally to support and create a healthy and biodiverse natural environment?

Manningham Council has produced and implements the following plans and strategies that address the protection of biodiversity:

- *Manningham Green Wedge Strategy 2004*
- *Green Wedge Action Plan 2011- 2020*
- *Healthy Habitats - Bushland Management Strategy for Council Managed Land 2012*
- *Development Guide for areas of Environmental and Landscape Significance 2010*
- *Manningham Green Wedge Infrastructure – Site Responsive Design Guide 201*
- *Municipal Public Health and Wellbeing Plan & Policy 2013*
- *Climate 2020 Action Plan 2009*
- *Carbon Abatement Plan 2014*
- *Securing the Future Plan 2012*
- *Open Space Strategy 2014*

Environmental conservation has also been incorporated in the Municipal Strategic Statement, Local Policies, the Rural Conservation Zone and a suite of Environmental Significance Overlays, Vegetation Protection Overlays and other provisions in the Manningham Planning Scheme.

Manningham also delivers a large range of services and programs to manage the natural environment and support biodiversity health. These activities are grouped together below in relevant categories:

Biodiversity Management Programs

- Local Environment Assistance Fund (LEAF): Offers property owners with environmental values up to \$1000 matching dollar for dollar for environmental works (pest plants and animal control works, erosion control, revegetation works, fencing etc.) on their private land.
- Hot Spots - Priority Precinct Program: Council funded targeted weed control works on identified high priority 'Biosites' on private land.
- Support for the Middle Yarra Landcare Network: The Network includes four groups: Friends of Warrandyte State Park (FOWSP), Jumping Creek Catchment Landcare Group (JCCLG), Andersons Creek Catchment Area Landcare Group (ACCA) and Wonga Park Environment Group (WPEG), with a total membership of over 300 families. Council support includes planning, practical on-ground help, education, supervision and committee membership. Regular activities include nest box making, seed collection, plant propagation, planting, weeding, fence removal and site maintenance.
- Vegetation condition monitoring.
- Engagement in regional projects such as the EAGA biodiversity monitoring framework.

- Undertaking research or contributing to research programs.

Environmental Education Programs:

- Environment Seminar Series and Walks: Manningham hosts a monthly environmental seminar series with an average of 40 attendees per seminar and five community educational field trips on local environmental treasures and issues. Manningham also conduct monthly nature walks with 182 walkers participating per annum.
- Waterwatch Program: Manningham has established a Waterwatch Monitoring Network which is a coalition of community volunteers established in 2007. In 2014/15 27 volunteers monitored 21 sites across Manningham.
- Kids Community Food Garden: This is a new place making initiative in the high density area of Doncaster Hill, that provides a place for residents to experience open space and community based food growing and harvesting.
- Smart Living program: A six week program of events around sustainable living with over 1300 people attending the series.
- Spring Outdoors: The Middle Yarra Spring Outdoors Program is a regional program of environmental events co-ordinated by Manningham, Nillumbik and Banyule Councils. It has been running since 2007 and in 2014/15, 38 activities were conducted with over 1200 people attending.
- Manningham Home Harvest Program: A monthly home gardening seminar series of 10 seminars with over 1400 people attending per year.
- Schools Sustainable Learning Program: The program is offered to all Manningham primary schools over 9 days involving 9 schools and delivered to approx 400 students per annum at Council's Currawong Bush Park Environment Centre. The modules covered include: Waste & Recycling, Ecology, Biodiversity and Environmental Leadership.
- Schools Sustainability Action Programs: These programs involve 85 participants per annum and is conducted at the school.
- Youth Leaders Sustainability Conference: The conference involves over 300 students from over 22 Manningham schools, who are trained to lead and assist the transition to a more resilient and sustainable community and roll out projects in their local community.
- Citizen Science Program: Manningham Council is commencing a Citizen Science program including training of community members to monitor frogs, bats, birds and arboreal mammals.
- Provision of nature play playgrounds.
- Walk to school programs.
- Exploring opportunities for bush kinder and bush playgroup programs.
- Running nature play programs for children and families during spring and autumn, including bush walks and cubby building.
- Established a nature play network for educators and community leaders
- Creation of Manningham Active Kids Facebook page to promote activity in natural spaces in Manningham
- Running a Junior Ranger Program.

Onground Management Activities:

- Weed management on Council managed bushland reserves.
- Fencing of reserves.
- Fuel reduction burns.
- Regeneration burns.
- Fire risk assessments.
- Revegetation/renewal of vegetation sites.
- Seed collection and propagation.
- Removing dumped rubbish and green waste.
- Building new water sensitive urban design (WSUD) infrastructure and maintaining existing.
- Maintaining litter management traps.
- Liaising and forming partnerships with stakeholders (eg. Melbourne Water, CMA).
- Controlling pest animals.
- Managing Crown Land as Committee of Management.
- Provision of a walking and bike trail network through parks and along creek corridors.

Planning and liaison activities:

- Applying for project grants.
- Assessing planning applications.
- Strategic planning to ensure a 'Balance of City and Country' (as described in Manningham's logo).
- Embedding biodiversity in all relevant strategies, policies and plans.
- Participating in external working groups and networks.

Question 13 – What else do you think you could do to support and create a healthy and biodiverse natural environment? What might help you to do this? What currently hinders you from doing this?

State government and Federal Government political, financial and legal support is required to assist Local Government achieve the Plan's objectives, especially having regard to financial constraints which will make it even more difficult resource conservation activities over competing priorities.

There is also a lack of resources for enforcement or follow up to back planning decisions and a lack of support for enforcement at a state level. There also needs to be a review of the state government penalties for illegal clearing of vegetation, as the current fines do not reflect the true value of the biodiversity lost and are not a deterrent to wealthy developers or land owners.

General marketing, promotion and advertising which connects the broader community with the stories of natural environments would also be a very useful tool. This would best run at a state or regional level.

Question 14 – What could businesses do to improve their environmental performance in relation to biodiversity? What might empower them to do this? What currently hinders them from doing this?

There are many opportunities for businesses to engage in practices that contribute to biodiversity protection and enhancement. However there is little incentive for businesses to consider their environmental performance.

Opportunities exist to encourage businesses to make greater contributions, such as:

- incentives/tax breaks for supporting biodiversity projects or purchasing and managing land for conservation;
- the ability to make tax-deductible donations to local biodiversity projects;
- having businesses understand whole-of-life-cycle processes that impact on global and local biodiversity; and
- providing educational opportunities to address a lack of knowledge and recognition of biodiversity values and ways in which businesses can function efficiently and in a more sustainable way.

Volunteer programs such as those available through Conservation Volunteers Australia and National Tree Day enable businesses to give back to the community and contribute to nature conservation. Support for these activities needs to be fostered and expanded.

A requirement for triple bottom line annual reporting could also provide the motivation for businesses to identify how they make a contribution and where they can improve. Rewards for businesses that conduct such reporting would provide an incentive for participation.

Question 15 – In addition to existing government, private and volunteer programs are there any other ways to help Victorian communities and local government agencies promote and create a healthy and biodiverse natural environment at local and regional levels?

Manningham City Council works closely with volunteer groups within the municipality to achieve biodiversity outcomes, however, Government leadership at the state and national level is key to protecting our natural resources and limiting the impacts of climate change. It is vital that community is supported in their efforts to work towards healthy and biodiverse natural environments and strong leadership and clear government policies that prioritise biodiversity protection are imperative.

Manningham suggests the creation of a Local Government-affiliated agency that implements the Biodiversity Strategy and/or environmental legislation. Such an agency could be resourced by State Government or clusters of Local Governments to achieve environmental outcomes that support State and Local Governments, private and volunteer programs, as well as Victorian communities.

Other suggested actions include:

- Designing economic systems that drive decision-making processes to value environmental services and the intrinsic value of biodiversity.

- Developing data and GIS management systems that monitor change over time.
- Offering long term community funding models rather than inconsistent annual funding programs.
- Ensuring that all government funding programs consider biodiversity – for example, ensuring government grants do not support damaging business, or that community sports grants are awarded for applications that have biodiversity works elements.
- Encouraging businesses that rely directly on the environment to support and give back to that environment. For example, private nature-based tourism companies could pay levies that support the management of conservation assets, or private holiday accommodation that is near parks could become 'park registered' where a portion of their nightly rate is contributed to park management.
- Supporting the development and promotion of urban biodiversity tourism opportunities.

Section 7 – Investing Together

Question 16 – What do you think of the idea to assist business and philanthropic sectors in protecting our environment?

The State Government needs to improve significantly its funding and investment in conservation activities. Whilst there is value in business and philanthropic sectors *assisting* to protect Victoria's environment, the State government should be the primary funding source. Philanthropic and business sector contributions should be complementary to government investment, but should not be expected to underpin protection of Victoria's environment.

Alternative models such as the one recently trialled by DELWP to match funding achieved through crowd-funding campaigns has showcased how the State Government can leverage support for biodiversity issues. This model may serve as a novel platform for business and philanthropic sectors to engage in funding the protection of Victoria's biodiversity.

More funding opportunities are required for strategic weed and pest animal removal programs, and programs that support natural regeneration and revegetation activities on private land. Additional funding opportunities are also required for regional pest animal programs, particularly those that target Indian Mynas, cats, deer, foxes and rabbits. Pest animal programs and implementation at the State Government level should be targeted to support threatened species and habitats, in addition to protecting high value agricultural areas.

Businesses should be encouraged to retain or create natural spaces within the land they own and/or manage for biodiversity outcomes. Such spaces would provide opportunities for the business' staff (including management) and visitors to connect with nature and serve as biodiversity stepping stones across often fragmented landscapes.

Question 17 – Should we support any other approaches to this issue?

Manningham considers that it is critical that the State Government investigates what approaches exist to 'invest together' and build partnerships. Co-investment approaches may include:

- Providing support and assistance to Not-for-Profit organisations to assist with streamlining costly inputs – such as data management systems, training, registration, HR and OHS costs to enable organisations to reallocate time and resources to delivering environmental outcomes.
- The promotion of business or philanthropic donations to Not-For-Profit organisations, rather than promoting investment in government projects.
- The promotion of 'General Corporate Social Responsibility' to Victorian businesses, to encourage investment by local businesses in local environments, preferably in collaborative partnerships.
- 'General Corporate Social Responsibility' could also encompass support for corporate volunteering in the community, and encourage businesses to volunteer time to environmental projects. Donated time could be a tax deduction.
- The creation of a streamlined, simple process for tax-free donations that are made in support of local environmental issues.
- A long-term funding strategy or income model could be derived from tourism. Private tourism companies, that often directly benefit from good quality natural environments for nature-based tourism, could potentially fund conservation works at all spatial scales. Examples of businesses that benefit from nature-based tourism may include horse/trail-riding, golf courses, bed and breakfast accommodation, and caravan parks.
- Encouraging the promotion of biodiversity at significant sporting and cultural events – such as the AFL Grand Final, Cup Day, Moomba.
- A Green Bonds scheme similar to a carbon price or Renewable Energy Certificate. Businesses consistently respond to market mechanisms that are designed to provide both incentives and disincentives. However the administration of any such scheme must be efficient and include embedded and robust governance processes.
- Support Local Government to provide rate reductions to land with biodiversity and environmental values.

Question 18 – What do you think of actively introducing species to new locations, or actively mixing genes within populations, as part of adaptation to climate change?

Ongoing research (including longitudinal studies) will be critical to our understanding of how species respond and adapt to changing climates and environments, and the development of evidence-based management approaches that incorporate species relocation or gene-mixing. Primarily, funding should be contributed to developing research and population/environmental management strategies of species in their known locations to maintain populations *in situ*. Movement of a species should be considered only when funding and research efforts are acceptable for adequate understanding of the biology and ecology of that species in its natural range. The approaches must be part of a comprehensive program that critically is supported by monitoring and an efficacious adaptive response framework. There will need to be a strong communication strategy backed by evidence-based decision-making to explain such an approach.

At the moment it is difficult to gain approval to reintroduce species lost from known historical locations. Resolving the policy framework for salvage and translocation of these species should be a priority, before funding and investment is provided to move species to 'new locations'.

The approaches suggested by Question 18 would need significant research for consideration of the following:

- Genetics and the potential for genetic pollution (including flowering synchronicity, pollination ecology, etc.).
- The potential for species being introduced to new locations to out-compete existing (indigenous) species.
- Implications on resource availability across the landscape, spatially and temporally.
- Whether actively-introduced species could become weeds in new landscapes in the future.
- How the target species may behave in the new environment to which it is introduced.
- The uncertain ways in which climate change could impact different landscapes.
- Existing and potential opportunities for natural movement to new locations.
- How resilience to climate change is achieved, including through natural genetic expression and evolution, and how these resilience mechanisms will respond to species relocation and genetic manipulation.
- University partnerships with practitioners and experts in the field need to be funded and established to help research, monitoring and provision of direction for such actions. Some species may need to be moved out of the state for long term preservation, therefore national and even international partnerships and knowledge sharing opportunities (such as the 'Managing Victoria's Biodiversity under Climate Change Symposium') are required.

Section 8 – Better Smart Management of our Biodiversity

Question 19 - How do you think we should address the impacts of feral cat predation on wildlife in areas of high biodiversity value?

Feral cats cause significant impact on our wildlife, however all feral animals that predate wildlife and/or impact wildlife habitat in high biodiversity areas should be considered as part of the Plan. This includes cats, foxes, pigs, horses, goats and deer.

Some actions that could assist with addressing the feral cat population and impact of feral cat predation include:

- Educating the community about the wildlife impacts of uncontrolled breeding and overpopulation of domestic cats.
- Undertaking genetic analysis of feral cats to determine sources of re-colonisation.
- Offering free or subsidised desexing of animals around areas of high biodiversity value.
- State Government introduction of night or 24 hour curfews across the state to help limit the breeding of more unwanted stray and feral cats in urban areas.
- Funding Council local laws officers in areas where Councils have placed cat controls or cat curfews.
- Trapping.
- Offering incentives and rebates for farmers who control feral animals on their land.
- Engaging the broader community about native wildlife and the impacts caused by cats. Bringing schools and community groups to places with re-established populations of native animals historically impacted by feral animals – e.g. Mt Rothwell, Woodlands Historic Park.

Question 20a - What does environmental land stewardship mean to you and how might this help you manage the natural environment?

Environmental land stewardship means that individuals and the community advocate for investing time, energy, dollars and resources into the protection, enhancement and management of natural areas and environmental assets. It means that people and organisations incorporate triple bottom line accounting into decisions made on land they own or manage.

Environmental land stewardship can enable biodiversity improvements at various scales: property, local, regional and state. Stewardship encourages people to plan long-term objectives for the land for which they are responsible. It can also facilitate provision of valuable tools to people to enable better protection of biodiversity values. Importantly, it can enable social change and reduce community isolation through programs that connect communities together, evidenced through successful land stewardship-based programs such as Landcare.

Successful land stewardship programs require a multi-disciplinary approach, where agronomists, water managers, biodiversity managers, governments, farmers, researchers, volunteers and others come together to learn from successes and failures that are occurring

within the landscape, to provide long term strategic guidance for landscape protection. Land stewardship standards should be based on the values and views of the local and regional community and they should be used to assist with developing and implementing strategies.

There are many ways in which land stewardship programs can be improved, including:

- Spatial mapping of financial investment.
- Case studies on successful (and unsuccessful) programs, guidelines and processes.
- Streamlining grant application processes.
- Connecting grants into one application – e.g. Stream Frontage Program, Landcare, Council Grants.
- Strategic planning for investment and targeted landowner engagement.
- Better monitoring of program outcomes and outputs including setting monitoring standards so that knowledge gained can be collated and shared.

Manningham considers that one of the biggest issues facing Local Governments in encouraging land stewardship is inadequate management of adjacent publicly owned and managed land. There is a perception that if the government cannot prioritise or manage pest plant and animal control on public land, how could (why would?) private landowners do so?

Question 20b - Do you think there could be some negative consequences of voluntary environmental land stewardship standards?

Some potential negative consequences of voluntary environmental land stewardship standards may include:

- Some landowners may voluntarily commit to meeting standards and others may not, leading to inconsistency in environmental outcomes across the landscape.
- The need for long term stable and consistent funding of the program including implementation, compliance, commitment, code of practice, standards.
- The perception by non-participants that the environmental outcomes being achieved by participants are increasing bushfire / wildfire risk.
- The small risk of splitting and fragmenting communities against one another if not well managed.
- Ensuring there is a positive role of philanthropy and corporations.
- Market issues, for example potential depreciation from on-title agreements.

Question 21 – What do you think are the appropriate options to use to address the various impacts and drivers of decline?

Manningham has serious concerns that the Plan fails to offer adequate solutions for the largest loss of biodiversity – that is, the removal of native vegetation – either unpermitted or via the diverse and poorly defined native vegetation clearing exemptions including fuel reduction for fire management.

Question 22 – What type of regional land-use planning approach would you prefer to reconcile the trade-offs required at landscape scale as part of our adaptation to climate change?

Trade-offs for biodiversity should not be considered as part of the response to adaptation to climate change. Retaining diverse habitats across a full range of climatic gradients, ecotypes and systems, connected across the landscape, is absolutely critical to enable adaptation and/or migration to occur. The ecological tolerance of species and communities is unknown; consequently, placing anthropic paradigms of which biodiversity values can be 'traded' may result in erroneous decisions and catastrophic consequences.

It is critical that strategic landscape-scale planning approaches are implemented to allow natural migration of species and communities across the landscape for 'rehousing' in response to climate change, particularly in coastal and alpine communities. There is also the risk that some species will have 'nowhere to go' in the wild. These species should still be maintained in botanical gardens and zoos for potential future reestablishment.

Notwithstanding, Manningham considers the following approaches are important for regional land use planning:

- A long term approach to strategic planning including zoning and overlays that allow protection of biodiversity and areas of strategic refuge for biodiversity *in perpetuity*.
- Incentives to use land in a way that sustains biodiversity.
- Increased support for agricultural production that incorporates biodiversity conservation.
- Taking a longer-term approach to strategic planning that reflects the broad range of social, economic and environmental objectives needed to protect biodiversity. Issues associated with 'whole of government' approaches to land use planning need to be considered and addressed, particularly with regard to strategic transport and social infrastructure.
- Setting targets for 'nature conservation' (e.g. 5-10% minimum) in new development areas, similar to the mandatory open space (passive and active) contributions.
- Giving consideration to whole of sector impacts of land use planning – not just the direct impact on native vegetation which may support threatened species. For example, the *State Environment Protection Policy (Waters of Victoria)* does not consider the impact of altered hydrological flows on biodiversity matters.
- Providing incentives for land uses that sustain biodiversity and increase support for agricultural production that incorporates protection of biodiversity.

- Committing to sustainable and strategic development of Victorian cities and communities to limit urban sprawl and associated direct and indirect impacts on biodiversity.
- Ensuring water catchments and fertile areas suitable for food production are protected.
- Acknowledging the role that introduced species and non-indigenous habitats can provide threatened species.

Question 23 - What do you think of the proposed approaches overall to manage Victoria's biodiversity? Which ones do you like and which do you have problems with? Are there any missing?

The Plan seeks to 'protect Victoria's environment' but deals only with biodiversity. Our environment is comprised of five main components: the lithosphere (soil), hydrosphere (water), atmosphere (air), cryosphere (gases that surround the earth) and biosphere (living things, broadly: biodiversity). Certainly, protecting Victoria's environment would require more than biodiversity protection and management. At times, the Plan addresses other environmental elements (particularly water) but the intent and extent of environmental protection the document aims to achieve is unclear.

The document is a very high level view of the ways in which Victoria's environment and biodiversity could be protected. Specific approaches – 'solutions' – are not detailed so it is difficult to assess how the proposed approaches will help manage Victoria's biodiversity. What actions will be implemented to generate real improvements in the environment or, at least, biodiversity? How will this plan elicit reforms to the current, inadequate approach?

The Plan contains very few, defined actions or targets that we can use to consider the merits of the proposed approaches. Generally, Manningham considers the implementation of any sound environmental actions as an improvement. However, actions must be defined, targets must be strong, monitoring and auditing must be performed, and there must be government accountability for performance against targets. Manningham recommends that actions and targets, as well as the monitoring, auditing and accountability framework, should be the subject of a second round of consultation.

A critical gap in the Plan is an explanation of what expenditure currently is directed to biodiversity protection and how much increase in expenditure is needed to meet the aims and objectives of the Plan. Can the strategy be funded? Can the Plan be implemented? Is there a State Government commitment to fund and implement the Plan?

Manningham is concerned the Plan does not adequately consider (or engage with) the significant role that Local Government plays in protecting biodiversity through, for example:

- Community extension and education work.
- Strategic planning.
- Reserve management.
- Investment in private land conservation.
- Most critically - its function as the Responsible Authority for most private and public land planning permit decisions and enforcement.

The Plan doesn't address the inadequate fines for non-compliance, which does not reflect the real economic value of the biodiversity lost and currently fails to create a bigger enough deterrent for offenders, especially developers and wealthy land holders.

The importance of Melbourne's Green Wedges is also missing from the Plan, and needs to be included as the Green Wedges preserve biodiversity on the fringe of the city that provide; much need clean air, protection of biodiversity, opportunities for human engagement with nature and linkages with the public reserve system.

The role of the Environment Protection Authority in protecting biodiversity also should be considered in the document which should also clearly state the role of the ports authorities, minerals, mines and forestry areas of Government in protecting and impacting on biodiversity.

Manningham is concerned with the use of the Melbourne Strategic Assessment (MSA) as an example of a successful regulatory framework for a strategic approach to biodiversity conservation in urban developments. The implementation of the MSA has been plagued by complex issues that are resulting in negative outcomes for several key threatened species. In addition, the MSA has resulted in low retention of local conservation values within new urban developments, reducing opportunities for residents to value nature or connect with nature on a daily basis. Thus, the MSA is an example of how a poor regulatory framework can fail to protect biodiversity, disconnect people from nature, and make it difficult to achieve Goal 1 of this plan. Manningham requests that the Melbourne Strategic Assessment Local Government Liaison Group is contacted prior to any future use of the EPBC Strategic Assessment Framework to discuss and learn from the ongoing biodiversity and social impacts of the MSA implementation.

Question 24 – Where are the best opportunities to integrate biodiversity with other on-ground activities? What is the best way to build participatory community processes to generate ownership of biodiversity outcomes in local areas?

Manningham suggests that the following opportunities be considered:

- Require all Crown Land leases and Committees of Management to report and monitor biodiversity actions and target-based outcomes.
- Require a percentage of all new developments to be retained for 'biodiversity areas' (see response to Q22).
- Provide Landcare, Local Government, Catchment Management Authorities, Committees of Management, Parks Victoria and DELWP with the resources they need (particularly on-ground staff, including in regional and rural areas) to assist and engage with communities to generate long-term ownership of biodiversity outcomes in local areas (ie. Catchment Management Officers).
- Require all State Government funding bids for infrastructure (e.g. bridges, new sporting facilities, train lines, etc.) to include a component of biodiversity protection or enhancement. Examples include using native species in landscaping, creating frog

bogs, minimising stormwater run-off (WSUD), nature play spaces. This is critical to help Victorians connect with nature on a daily basis and come to value nature.

- Require the retention (or creation) of local biodiversity conservation reserves in strategic plans.
- Ensure that pest plant and animal control/regulations do not negatively impact on biodiversity – e.g. Serrated Tussock fields are habitat for several threatened reptiles, Sweet Pittosporum provides critical understorey habitat for many threatened woodland birds and Chilean Needle Grass supports Golden Sun Moth. It is vital that pest plant and animal regulation is dynamic and has mechanisms to adapt to local conditions and long-term approaches.
- Prioritise protection of Melbourne's green wedges – not only are the green wedges 'the lungs of Melbourne', they are critical opportunities for Victorians to connect with nature.
- Ensure that the future Metropolitan Open Space Strategy considers biodiversity as a key value of open spaces.
- Align public and private funding sources and programs to allow for combined investment in biodiversity protection activities.
- Provide funding for citizen science projects and programs, key mechanisms for engaging the community in participatory processes that increase connections with nature and contribute valuable information to research questions.
- Provide resources for indigenous nurseries and community 'Nature in Backyard' type programs.
- Provide people a chance to do 'hands on' conservation work.

Question 25 – What would you like to see in a Regional Biodiversity Investment Prospectus?

Manningham would like the Regional Biodiversity Investment Prospectus to include consideration of social benefits and opportunities when selecting sites for funding - not just modelled ecological values for threatened flora and fauna.

The Prospectus should provide opportunities to save all species, not just 'threatened' or 'at risk' species. Maintaining the integrity of common species is vital for long term ecological stability. The Prospectus should also include short-, medium- and long-term goals.

Given that Local Government provides incentives to private land biodiversity programs and funds significant biodiversity programs on Council-owned freehold land and land that it is a committee of management for, Manningham recommends that Local Government must be consulted on the methodology and inputs that drive the Regional Biodiversity Investment Prospectus prior to it being publicly released.

Question 26 – What do you think is the best way to manage and respond to shocks or unforeseen events through the conservation planning process?

Manningham regularly witnesses, manages and responds to significant shocks to local biodiversity. These include fire, drought and pollution events. Indeed, Local Government often is best placed to respond efficiently to environmental shocks and unforeseen events owing to strong community links, a high degree of local knowledge, and personnel and resources that are located close to any site.

Managing and responding to shocks or unforeseen events requires the conservation planning process to be better integrated across the various state and Local Governments, agencies and stakeholders so as to achieve improved, efficient, cost-effective emergency management and responses that consider biodiversity as a core value. This could be achieved under a *Biodiversity Conservation Act*, which also would provide a legislative framework for the implementation of this strategy. There should be a specific budget for emergency events and any consequent monitoring and management actions required to rehabilitate affected areas. Emergency Management Victoria should have to include biodiversity considerations in its emergency responses and within emergency recovery plans.

There should be facilitated community, government and 'expert' liaison groups that focus on recovery planning in each bioregion/DELWP region, which can plan for events, provide advice during these events and assist with recovery after events.

Section 9 – Biodiversity Leadership Across Government Areas

Additional Question - How do we deliver and evaluate the success of the plan?

Manningham notes that Section 9 did not include a question, however we consider the following is needed for Victoria to show leadership in biodiversity conservation:

- Provide full, long-term State Government commitment to fund implementation and evaluation of the plan to ensure protection of Victoria's environment (at least, biodiversity).
- Integrate the early consideration of biodiversity values and climate change implications into government decision-making.
- Provide adequate resources to collect robust, reliable baseline data to monitor changes over time.
- Continually seek and exploit opportunities to educate the community, industry, and government to encourage more Victorians to value nature and expect that Victoria's natural environment is healthy, now and in the future. Education is key to getting support and commitment for the successful delivery of the plan.
- Incorporate 'biodiversity' into day to day 'core business' activities of all areas of government and industry.
- Ministers need to advocate for biodiversity issues and values.
- There needs to be frequent public reporting. In particular, if a decision is made to 'let a species go' due to climate change this decision should be made obvious and known to the community. In this way, the community will come to understand that they can 'take positive personal action to protect and preserve our natural

environment'. Few people would be comfortable accepting extinction of a species. Rather, many would use that loss as a catalyst for personal change and demand a better future.

- Ensure that the *Flora and Fauna Guarantee Act* sets up a regulatory framework that will achieve the targets and aims of the Plan and provide strong enforcement ability.
- The State Government should set and achieve minimum standards for management of all land supporting high biodiversity values (e.g. rail reserves, road reserves, cemeteries, airports, Crown Land, State Forests, Council-owned freehold).
- Biodiversity protection and conservation should be proactive but when opportunities and significant risks arise there must be ability to respond quickly (e.g. following bushfires or disease outbreaks, the arrival of new invasive species, and favourable climatic conditions for recruitment).
- To ensure successful delivery of the plan, all stakeholders and implementers need to be involved in the setting of targets and achieving outcomes.
- Parks Victoria should be funded to be a leader in management of conservation areas. The reducing funds provided to Parks Victoria impacts on its ability to showcase the best of the biodiversity that Victoria has to offer and be present to engage the community, improve community perceptions/understanding of natural areas and facilitate connections between Victorians and nature. There are limitless opportunities for Parks Victoria to achieve these outcomes, for example through personal interaction, a regular engaging media presence, guided tours, education programs, etc.
- DELWP should be the leader of regional planning and implementation of biodiversity outcomes on public and private land. It should work in conjunction with Local Councils, community, water authorities and public land managers to design, implement and achieve these outcomes.
- The targets set within the next phase of the Plan should be S.M.A.R.T. goals within an action plan associated with each target and funding to achieve the aim. The targets and Action Plan should be developed in consultation with key stakeholders (including Local Government), and reported on and updated at least every 5 years.
- It is critically important that baseline data are collected in order to measure success. Collection of baseline data can commence immediately, prior to adoption of this strategy.

Conclusion

Manningham City Council appreciates the opportunity to provide feedback in relation to *Protecting Victoria's Environment – Biodiversity 2036* and looks forward to the issues raised in this submissions being addressed in the final Plan.

Council urges the State Government to provide a long term financial commitment to appropriate resourcing of implementation of the Plan and to actively engage with Councils in the next stages of development of the Plan, including the setting of targets, and in implementing the Plan.