



Newham & District Landcare Group

PO Box 314, Woodend, VIC. 3442
orseda@bigpond.com

Website: <https://newhamlandcare.info/>

21 October 2018

Response to the Macedon Ranges Draft Biodiversity Strategy

Newham and District Landcare Group (NDLG) commends the draft strategy report as an excellent document. It evidences much careful thought and research and incorporates outcomes of consultations we were pleased to be part of.

The draft Strategy gives the best and most complete overview of the biodiversity situation specific to the Macedon Ranges (MR) there has ever been. The structure is clear and easy to follow and it provides a framework to build on.

It clearly outlines without jargon the current state of play to provide a valuable reference document and source of comprehensive information. The maps are very useful illustrators of the text (we note that there is one to be added at p48 illustrating Vegetation Protection Overlays).

Climate change is rightly stated as a principle of the Strategy: *“Consider climate change in all conservation efforts with a focus on building natural ecosystem resilience and connectivity”* (Section 3.2 p10). As MR native vegetation in higher elevations and its protection is vitally important to the whole region in the context of rising temperatures, we would like to see climate change up front and centre - in both the Executive Summary (paragraph 6) and the Consultation Summary sheet.

We suggest that the importance of soil management be added to the strategy. Soils are a basic component of environmental health and therefore biodiversity, highlighted for example by the latest Victorian Landcare and Catchment Magazine (Spring 2018, issue 73) on managing soils.

NDLG supports the actions as summarised in part 9 with additional comments as follow in this response.

Section 6 Threats facing biodiversity p38

Under 6.1 *Human uses and activities* add a heading **Public land management practices**.

Management protocols need monitoring and improvement, as in many instances, roadsides and railway verges for example, have and are being degraded by poor practices of Shire/State and other service providers.

Discussion on pests occurs further below.

6.3 Fire and biodiversity, p41

This important and controversial issue and is well discussed here. The rationale for fire prevention strategies on roadsides and public land needs to be included somewhere as an action, perhaps under

community education – there is a need to change perceptions, and put the onus back on resident action on their own place to protect their lives & property.

Section 7 Management Actions, p43>

Improvement to planning controls

The draft is comprehensive in detailing the current controls and situations where a permit is currently required. It is clear however from the work undertaken for the study that in many areas the current controls are not sufficiently accurate (identification of land areas) and omit high value areas. Newham and District Landcare Group (NDLG) supports this conclusion.

Rural Conservation Zones

Agricultural activities in the RCZ Cobaw biolink area are damaging native vegetation and impacting on waterways. If *“the primary purpose of the RCZ is to protect and enhance the natural environment..etc”* (p43) then it is failing...or certainly not doing what it should/could.

- Is there a way to review ground layer vegetation and, if significant remnant is present, stop or limit this?
- Unfenced sections of creek for stock access – currently a planning application will result in a requirement to fence a waterway, but what about all the other properties where this happens but there is no trigger in the current set-up to obligate landowners to protect these community assets? In some cases stock are actually confined to riparian zone (eg goats on a stretch of Dons Rd impact on 500m+).
- Grazing under native canopy is an existing use in many stock grazing areas. All these canopied areas, regardless of the quality of their ground-layer, are important to connectivity within the Cobaw Biolink.
- These areas need to be targeted for protection and enhancement. How?
- Some members consider that some RCZ planning permit requirements (p43-44) need review by being too restrictive of some modern home business uses: for example what is a place of assembly and why is it prohibited? What about workshops, courses, studio.... – uses which could be very compatible with biodiversity.

NDLG supports the recommendations with comments on the following:

Land Management Plan Requirements

NDLG strongly supports the use of Section 173 Agreements and the increase of penalties for non-compliance to ensure penalties are not the “cost of doing business”.

Vegetation Protection Overlays

VPO2 Roadside Vegetation

NDLG supports the recommendations but there is a variety of views about applying the permit trigger to removal of native vegetation only. One is that *“the removal of any vegetation requiring a permit must be retained. Limiting the permit to native vegetation gives an out to offenders to claim ignorance as to what is native vegetation. It is preferable that all areas where vegetation removal is contemplated that Council have the opportunity to examine and determine if native vegetation is*

present. On conclusion of that examination exemption is given. Removing the “any” to “native” is likely to increase permanent loss of Roadside Vegetation.”

Others say this is a grey area – many biodiversity conscious landholders will continue to remove weeds responsibly without permits. So *“inclusion of a mechanism that exempts **specified** environmental weeds from requiring a permit for their removal”* (p71) is possibly a better option.

We query the inclusion of large old trees in designating a roadside of *Low conservation value*, whereas *Medium* says large old trees are generally absent. Large old trees have biodiversity and connectivity value. We look forward to the inclusion of a map showing roadsides of *Very high, High, Medium* in the RMP.

VPO3 Native Grassland – NDLG supports the recommendations with exception of the permit trigger for the reasons noted above under VPO2

VPO6 Wildlife Corridors – NDLG supports the recommendations but questions total removal of VPO6 Wildlife corridors. A number of wildlife corridors have been established on private land either through personal belief or by use of grants from agencies. These currently are not recorded by Council and subsequently unless maintained by the landowner fail in their task. By example in a recent approval for a dwelling permit on land over 40ha no reference was made in the land management plan presented to Council to preserve the existing wild life corridor. By way of explanation Council advised they had no record of the corridor when a site inspection of reasonable quality would have identified the corridor. This was particularly disturbing given the property is within the Cobaw Biolink area.

Also, Wildlife Corridor could be a good designation for planting on private land adjacent to significant roadsides and other significant native vegetation.

Accordingly NDLG recommends that: A survey is carried out and the presence of wildlife corridors on private land is mapped and owners are encouraged to register them on title.

Environmental Significance Overlays

ESO4 and 5 Potable Water Catchments – NDLG does not support the recommendation to narrow the definition. It is preferable that when contemplating vegetation removal that the landowner contacts the relevant authority who will determine if removal can go ahead. It is too important to let the landowner decide.

Legal Protection of Biolinks

Current legal protection of biodiversity assets is not good enough. We suggest that protection of Biolinks by Act of Parliament needs to be on the table as a strategy to be pursued by all agencies involved including MRSC, as it now is for the Rivers of the West, following on from the Yarra Act.

7.2 Objective 2: Improve existing biodiversity and native vegetation access public and private land.

NDLG supports the recommendations but notes the significant work involved and requests involvement when setting priorities.

Roadside management

NDLG has been pleased to be involved in the development of the long-awaited Roadsides Management Plan due in 2019, and at action 2.10 on the RMP (p84) urges that a high priority be given to “integrate outcomes into council work practices”.

We support the recommendations about modifications to VPOs as per above.

Please add Sheltons Rd to the list on p84, NDLG regards it is one of the “jewels in the crown” of high value roadsides. (*Edit – spelling of Hennebergs not Hennerbergs Rd*).

We would like to see the use of Cypress hedges discouraged in favour of “encourage use of locally native species as wind breaks and along property boundaries” (p70), and indeed banned where they impinge on roadsides. They affect sight-lines and are a fire hazard every bit as serious as untreated roadside weeds; why should the finger be pointed to native vegetation and fallen timber and not these?

Firewood collection There is a variety of opinions on this, varying from one members opinion re p65 on VPO9 “*NO wood to be collected, on-ground material is essential for habitat and total ecosystem – including insects (native bees) and micro fauna*” to alternative views on collecting fallen timber for fire management. These photos taken on Oct 19 of piles from fallen trees near the corner of Sheltons and Bolgers Rds are a good example of what **not** to do.



On roadsides piles of lopped tops or branches on remnant native vegetation is detrimental to the covered flora. Whether by contractors or landowners this should be prevented. Otherwise woody debris on remnant roadside should meet the minimum levels appropriate for the specific EVC, and before any is removed an assessment should be undertaken to ensure the standard is met. We argue that all large timbers remain, and that no collection be permitted from roadsides by the public because removal of tops and small branches is what is required if one is trying to reduce ‘fire risk’ and this is exactly what firewood collectors leave behind.

Landscape connectivity plan and Landcare groups

The map on p90 is a highlight and deserves to be widely distributed (with stronger farm zone outline, and labels as on the community summary) – eg as a laminated poster.

We note from the map on p89 (note – the pink of *Native veg playing a connecting role* needs to be bolder) that connected habitat patches of native vegetation (green) in NDLG’s area are scattered;

similarly the map indicating native vegetation vulnerability to climate change (p42) shows the smaller patches in our area as highly vulnerable. There is great potential, indeed **an imperative**, for further actions to strengthen connectivity here.

MRSC has taken steps to establish this connectivity – eg the Cobaw biolink overlay, incentives for landowners (subsidy scheme at outset, Trust for Nature covenant rate rebates), and extensive gains have been made in the last 14 years thorough the efforts of NDLG and Melbourne Water. More is needed.

Cobaw Biolink (p92) - Para 1, last sentence, does not accurately reflect the amount of on-ground works undertaken. NDLG suggests text is changed as follows:

“Much work has already been undertaken by the local Landcare group. This includes extensive mapping and monitoring of roadsides, recruitment of over 30 landholders to participate in funded enhancement projects, and the provision of information, training and physical assistance, plus subsidized revegetation materials (thousands of plants at a cheap price, free recycled hardware) to more than 50 other landholders.”

Compliance, weed and pest control

As noted in second last para on p80 “responsibility for controlling weeds and pest animals rests with the land manager”. However confusion reigns among landholders about this and how Council (and its Council’s Local Law No. 10) interacts with the CaLP Act administered by DELWP in relation to who monitors and orders compliance with this responsibility. Clarity in the strategy would be useful.

Cats

NDLG is adamant that Council should adopt a cat curfew.

A committee member writes (with agreement from others):

“If we are serious about biodiversity, cats should be either banned altogether from the Macedon ranges or subject to the strongest controls. I would prefer the former. If cat ownership is to be allowed, the strictest laws should apply. If cats are allowed outside a building their ‘run’ should be caged with chicken wire – sides and top. This is the only responsible way to contain a finely adapted killer of native fauna. Registration fees should apply and strict council supervision of the conditions for cat ownership should obtain. Feral cat extermination programs need to be instituted. Unless such protocols are introduced and strongly maintained, it is a complete waste of time to talk about biodiversity.”

Another view supports “a strong requirement to maintain control of cats but not elimination as they contribute greatly to the wellbeing of people as a pet. Feral cat extermination is to be encouraged and if prosecuted vigorously would address a significant proportion of the problem and highlight the extent of domestic cat predation.”

Dogs

We support clear designation of ‘off-lead’ areas as alluded to in the Strategy, otherwise dogs on leads. Better co-ordination with Parks Victoria rangers is needed to allay confusion and better monitor regulations - perhaps an MOU.

Rabbits

As is stated “more than 2 rabbits per hectare can virtually eliminate the regeneration of plant species” (p39). Landowners/residents doing biodiversity conservation work need urgent help with rabbit control if regeneration efforts are to be worthwhile. Help is needed direct from MRSC, as well as via Landcare. Using Land Management Plans (LMPs) for biodiversity conscious landowners could be the mechanism; this would need for several MRSC outreach officers.

Deer and goats are mentioned as pest animal threats on p94, and could be included on p 92 Cobaw Biolink, and p93 where they are hunted near Tylden (Upper Coliban Biolink). As they are a growing threat we urge strong advocacy for eradication as mentioned under Council Actions on p97.

NDLG suggests a stronger discussion and emphasis on compliance generally. The strength of the Strategy is that it sets out ways to get all residents on board but there needs to be a stronger element of compliance/compulsion if we are to be serious about biodiversity.

Preservation of habitat on private land

As the Strategy mentions (p 84) 87% of land is in private hands therefore engagement with the public is essential. NDLG strongly supports the establishment of an extension officer role (2.17. p86) and argues several people would need to be employed to cover the Shire.

Rate rebates are a great way to encourage private land holders to participate in habitat preservation and restoration, as is involvement with Trust for Nature. But we note only some 360 ha are currently included (p85) so a big effort is required here!

Improving MRSC website indexing, archiving and search engine capacity would help with public education: for example information pages do not link to Council documents or strategies which are hard to find unless one knows of them. As the Strategy is a wonderful “hub” document please consider publishing the final document as a dedicated web page with live links to documents mentioned.

When new ‘tree-changers’ (eg retirees with money) come to the Macedon Ranges some requirement to make people realise that there are responsibilities about living in the country is needed. A comprehensive new residents kit is a good way to start. Review and revision of local planning policies (70) will be important.

For example, one member’s potential vision is to create a “Biolink Custodial Zone” (BCZ), to attract people committed to biodiversity to buy land and live in BCZ biolinks and serve as “Biolink Custodians”. BCZ could be sold only to owners approved/selected by the “BCZ Authority”. In designated biolink areas, part of a property otherwise unable to be subdivided could be *permanently* re-zoned as BCZ.

One comment made is that the strategy is a great document, *“but is ‘carrot flavoured’, not enough ‘stick’! Preserving habitat and biodiversity is fundamentally a scientific pursuit with the desirability of agreement of all residents. There is a sense in which democracy has to take a back seat and allow the ecologists – the science, to make the rules.”*

Monitoring

Monitoring Landscape change p 105 - note to add Newham to Waterwatch.

P102 – add Farmers Markets to *Audience: Shire visitors and general community*

Encouraging public data collection and utilising citizen science is a good idea - encouraging collection of new records using the methods listed (3.2, p110) will require some training in use of apps, mapping, recording etc. This could be added to Community Group actions p104 as part of enhancing capacity of community groups as well as private landholders. Similarly for remedying the dearth of data on the VBA.

Resourcing

Extra resources beyond those recommended will be needed. We are pleased to note the appointment of a Bushland Reserves Officer from last Budget resources (p81) but stress the importance of far greater resource allocation for the recommendations made, for example: at 2.17 p86 “establish an extension officer role’ to work with private landholders: we suggest at least 5 would be necessary to cover the whole shire.

Other measures mentioned like ‘strong education program’, ‘management courses’, and ‘updating information resources’ are all excellent BUT they will all cost extra money beyond ‘Existing’. A specific example for 2.10 which we have flagged in letters and meetings with the Shire previously, is better equipment such as an excavator and tip truck in addition to the grader for the Operations Department to enable improved/less destructive work practices on roadsides. We realise that community members have a role in lobbying Councillors but for the Strategy to succeed extra Budget allocations will be essential.

In conclusion, NDLG is very supportive of the draft Biodiversity strategy and notes its congruence with many of the themes and action items arising from our April 2018 future planning meeting. It is truly reflective of community input in terms of local knowledge, values and priorities, as well as being skilfully based in the context of existing data, policy and planning considerations. We look forward to continuing this effective collaboration between community and Shire to achieve a shared biodiversity vision.



Helen Scott, Secretary
on behalf of Newham and District Landcare Group