

# Green Wedges Coalition - a vision for Melbourne

## PARLIAMENTARY INQUIRY INTO ECOSYSTEM DECLINE IN VICTORIA

### GREEN WEDGES COALITION SUBMISSION – 31 AUGUST 2020

The Green Wedges Coalition is pleased to have an opportunity to contribute to this Parliamentary Inquiry into ecosystem decline.

Our submission is concerned with the issue of ecosystem decline in the Melbourne Metropolitan area.

Protection and enhancement of the natural environment in Green Wedges is a major issue for metropolitan Melbourne as the health of these natural ecosystems is vital to sustaining the benefits derived from urban nature, indigenous vegetation communities and associated habitat for native fauna, cleaner air and water and reduced heat impacts of climate change.

The natural environment is a major component protected under existing planning policy for the Green Wedges and the scope of this issue can be appreciated from the map below that shows the extent of the Green Wedges that cover some 600,000 hectares.



(Source: The Department of Environment, Land, Water and Planning)

The Green Wedges Coalition is comprised of 164 community groups from around Victoria. The Green Wedges were originally put into place in 1971 and formally recognised in 2002 in the planning document Melbourne 2030. Since our group formed, we have worked tirelessly to protect Green Wedges from inappropriate development. As a result, we have extensive experience in working with planning issues, drawing upon federal, state and local planning legislation and developing a practical understanding of how the regulations interact and operate ‘on-the-ground’.

In its charter, the Green Wedges Coalition recognises that:

*This vision for Melbourne, handed down by our parents' generation, has helped make ours into one of the most liveable cities in the world. At a time of unrivalled prosperity, rising community awareness and appreciation of the value of green city spaces to our personal wellbeing, we regard maintaining the green wedges for future generations as a yardstick for our generation's commitment to developing a sustainable city in a sustainable world.*

We represent the lived experience of planning decisions that affect our daily lives, and we have tracked the ongoing effects of inappropriate development and the impacts on communities for almost two decades.

We have addressed the key questions as set out in this Parliamentary Inquiry below.

**(A) THE EXTENT OF THE DECLINE OF VICTORIA'S BIODIVERSITY AND THE LIKELY IMPACT ON PEOPLE, PARTICULARLY FIRST PEOPLES, AND ECOSYSTEMS, IF MORE IS NOT DONE TO ADDRESS THIS, INCLUDING CONSIDERATION OF CLIMATE CHANGE IMPACTS;**

**NEED TO PROTECT ALL INDIGENOUS VEGETATION COMMUNITIES**

There is a need for recognition of the vital importance of indigenous vegetation cover in peri-urban areas such as the Green Wedges and its vital contribution to the sustainability and liveability of Melbourne as a major metropolis.

There is an understandable focus on 'at risk' species of indigenous flora and fauna under National and State legislation. But at the same time there needs to be a similar focus on protecting all indigenous vegetation communities. Not only do the indigenous vegetation communities provide the natural environment and habitat on which at risk fauna and flora depend for their long term survival but are fundamental to the State Government achieving its policy of achieving net gain in the quantity and quality of indigenous vegetation on the Green Wedges.

Our indigenous vegetation communities in the Green Wedges provide:

- Habitat for all indigenous fauna and flora
- Canopy cover that reduces the heat island impacts in Melbourne.
- Critical connections between ecosystems. This includes natural wildlife corridors between otherwise isolated public nature reserves (e.g. National Parks and Council Reserves). This is particularly important with the need for migration of indigenous species to meet changes conditions under climate change.
- Protection of the natural infrastructure of our waterways.

**CONNECTIVITY**

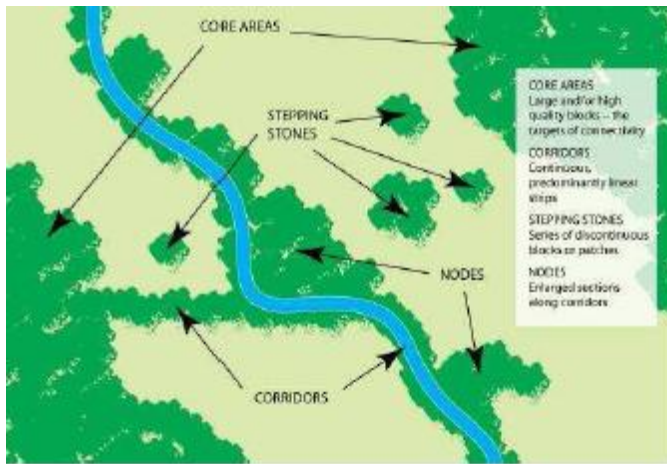
Plan Melbourne identifies that:

*Existing green spaces need to be protected and new green spaces need to be created to improve **landscape connectivity** and resilience.*

The vital importance of landscape connectivity for nature conservation is well recognised and documented internationally. It is vital to connecting otherwise isolated parks and reserves. As in

humans, this is essential to enable genetic diversity to make species more robust to changes in environment conditions. Connectivity increases the size of habitat availability and most significantly in this era of climate change enables species to migrate to from increasing hostile changes conditions to more suitable habitat for their survival.

A diagram sourced from work done by the Cardinia Environment Coalition has produced a useful diagram to show the different types of connectivity. Both road corridors and waterways are avenues for connectivity.



Source: Cardinia Environment Coalition

The Port Phillip and Westernport CMA hosts and coordinates a *Living Links* program that has as its goals:

- **A web of green.** *The region supports an interconnected network of high-quality natural spaces and associated recreational assets.*
- **People are connected to nature.** *The community values, uses and actively cares for natural spaces (and associated recreational assets) across the region.*
- **Urban nature is valued and resourced.** *Government and stakeholders see urban nature (and associated recreational assets) as a high priority for support and investment.*

Current Living Links partners include a number of Green Wedge municipalities along with Melbourne Water, Parks Victoria and South East Water, Conservation Volunteers Victoria and Bushwalking Victoria.

A useful reference to understand what is being done, is a publication called *Living Links – Corridors of Connectivity- Master Plan Project 2 Discussion Paper – October 2010* that shows mapped corridors for thirteen waterways in the foothills of the Dandenongs and Port Phillip Bay in Melbourne’s southeast.

**(B) THE ADEQUACY OF THE LEGISLATIVE FRAMEWORK PROTECTING VICTORIA’S ENVIRONMENT, INCLUDING GRASSLANDS, FORESTS AND THE MARINE AND COASTAL ENVIRONMENT, AND NATIVE SPECIES;**

## **FUTURE LAND USE AND DEVELOPMENT**

In the Green Wedges around Melbourne, there is an urgent need to strengthen the controls in the Rural Conservation Zone (RCZ) and Green Wedge Zone (GWZ) to protect biodiversity. The RCZ in particular is the one State-wide rural zone that has a specific focus on conservation of natural vegetation communities and habitats.

There is growing pressure for built development in the Rural Conservation Zone and Green Wedge Zone and the current planning provisions are not strong enough to stop a cumulative deleterious impact on biodiversity values resulting in the deterioration, fragmentation and loss of indigenous vegetation communities and habitat.

Two examples of major detrimental impacts on indigenous vegetation that need to be addressed in any move to strengthen the planning provisions to protect biodiversity are uncontrolled grazing and pig farming.

### **Uncontrolled grazing**

Uncontrolled grazing is a major issue for the loss of indigenous and other native vegetation.

Clearance controls for native vegetation under *Clause 52.17 Native vegetation* do not apply to grazing. Specifically, 'Grazing' is exempt from clearance controls in relation to freehold land and Crown land in accordance with a license, permit or lease granted under applicable legislation.

Grazing encompasses any animals covered the definition of '**Animal husbandry**' in the VPPs that encompasses 'Land used to keep, breed, board, or train animals, including birds' and would include cattle, sheep, horses, racing dogs, pigs, etc.

Achieving protection and enhancement of native vegetation communities on private land is complex as there are many types of private land use.

The only effective way of protecting native vegetation, whether planted seedlings or natural regeneration, from grazing animals on private land is by some of fencing, either of individual plants or areas for regeneration..

The Decision guidelines for the RCZ and GWZ require for 'Rural issues' that the responsible authority as appropriate must consider (inter alia):

- *The environmental capacity of the site to sustain the rural enterprise.*
- *The need to prepare an integrated land management plan.*

It is within the power of municipal councils under their planning schemes to require a land management plan in relation to any proposed rural enterprise involving Animal production to address the issues of whether a site has the environmental capacity to sustain a rural enterprise.

An example of a Land Management Plan is to be found on the Nillumbik Shire website that says that *'These plans should generally accompany planning applications that seek new development and /or the introduction of new land uses on land in rural or environmentally significant areas'*.

There is no more work in terms of the planning process as the preparation of a Land Management Plan by the applicant is fundamentally being required to address, in a structured way, the questions in the existing Decision Guidelines for the GWZ, GWAZ and RCZ. It is reasonable to assume that carrying capacity and fencing will be important aspects of any such plan.

### **Pig farming**

Pig farming was originally defined as 'Intensive animal husbandry' in the VPPs and was prohibited in the RCZ and GWZ. Subsequently under the State Government's 'Sustainable Animal Industries Initiative' in 2018 the pig farm was put under the more general heading of Animal production and intensive animal production was limited to cattle feedlots and intensive dairy farms.

Pig farming risks the degradation of natural resources including indigenous vegetation (and other native revegetation), soil erosion and offsite effluent pollution.

Clause 53.16 PIG FARM has as its purpose 'To facilitate the establishment and expansion of pig farms in a manner consistent with orderly and proper planning and the protection of the environment.

Clause 53.16-2 specifies conditions under which pig farm planning applications are exempt from notice and third party review. This means that a pig farm could be established without the knowledge of surrounding land owners and without any right to object.

Clause 53.16-3 contains a series of Decision guidelines but these by their very nature are not mandatory and it is not immediately evident that local government has the necessary 'in-house' expertise to adequately assess such nominated 'low risk' planning applications, in accord with the *Victorian Low Density Mobile Outdoor Pig Farm Planning Permit Guidelines June 2108*.

While there may be some justification for applying this in rural areas outside the Melbourne metropolitan area, it is fraught with difficulty for the generally smaller lots found in the RCZ . Where the issues relating to the Decision guidelines especially in relation to *'The need to protect amenity of existing uses on adjoining land'* and *'The impact of the use of the land on the surrounding area, including from emission of noise, light, vibration, odour, dust, or waste product'* becomes so much more concentrated with the high likelihood of close neighbouring properties.

It could be argued *that* pig farming should be a prohibited use in the RCZ. But that at the very least all applications in the Green Wedges, no matter what the size should be the subject of the normal provisions of Section 2 uses for notification and right to object.

### **Uncapped built development.**

There was commitment made by the Planning Minister in the lead up to the 2018 State Elections to ‘put a cap on the size of developments’.

Excessive built form development and associated infrastructure is a major issue impacting on the Rural Conservation Zone and Green Wedge Zone. The ongoing cumulative detrimental impact of such individual developments is commonly referred to as death by a thousand cuts.

As a basic principle, all new proposed built form and associated infrastructure (e.g. parking, access roads etc) should always be subordinate to rural uses that encompass the values fundamental to the Green Wedges.

The cap on the size of developments needs to both address minimising the building footprint but also containing that within a defined building envelope.

Failure to apply a building envelope will make imposition of any minimal footprint as meaningless given the capacity for the spread of buildings to fragment any given site and effectively negate any rural uses.

FIG 1 - UNCONSTRAINED AND DISPERSED

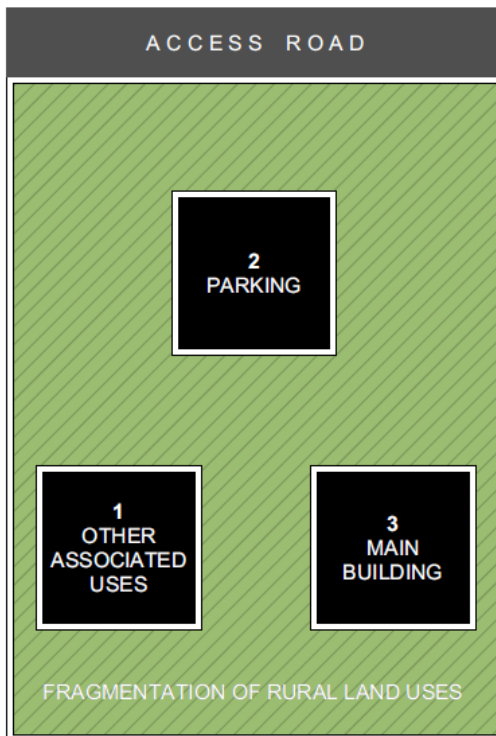


FIG 2 - CONSTRAINED BY ENVELOPE

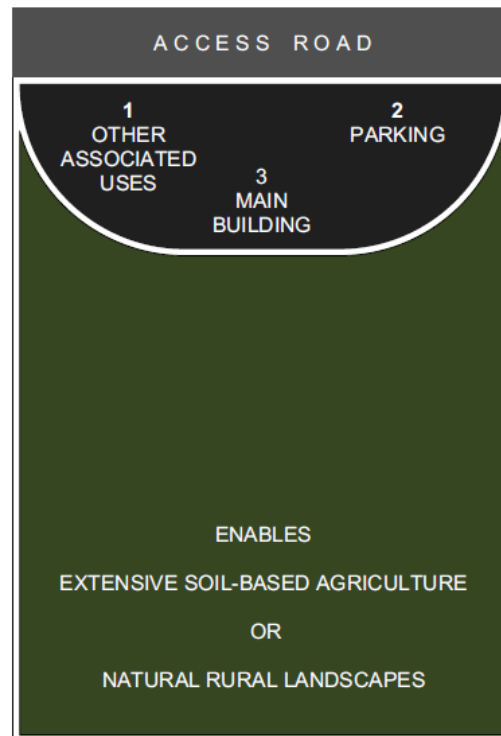


Figure 1 shows the typical type of approach to built form development in planning applications evidenced by the Green Wedges Coalition. It may comply with having a low footprint as defined by the immediate area covered by buildings and hard surfaces but it effectively fragments and effectively destroys rural land uses that protect the values that are fundamental to the purpose of the Green Wedge Zones.

Figure 2 confines the built form and associated infrastructure to a building envelope and allows for the same level of built form but enables continuation or enhancement of rural uses that support the values of the Green Wedges. The placement of the development near the road is purely for illustrative purposes to show the confinement of the built form but in reality would need to respond to best placement for a given site.

Both a number of 'Places of worship' and tourism developments provide examples that amply illustrate the impact of excessive built form and associated infrastructure.

It is proposed that all future planning applications for built development in the Green Wedges must be accompanied by a Land Management Plan. This is not proposing any additional red tape but rather a formal and transparent process for addressing the decision guidelines as stipulated the planning provisions for the Green Wedge Zone and Rural Conservation Zone.

### **(C) THE ADEQUACY AND EFFECTIVENESS OF GOVERNMENT PROGRAMS AND FUNDING PROTECTING AND RESTORING VICTORIA'S ECOSYSTEMS;**

#### **Funding**

Funding is always a major problem for biodiversity related programs. The provision/delivery of private landholder engagement that encourages the protection of significant species and habitats through education, support and incentives is essential, along with greater government effort and resources focusing on increasing the opportunities for and willingness of landholders to restore and protect biodiversity on private lands.

I think a strong argument can be made for increasing State Government funding for biodiversity as there are considerable overall strong community benefits. Two areas of importance to the State Government that could increase opportunities for biodiversity funding are tackling the impacts of climate change and protecting essential natural or green infrastructure.

#### **Support of Melbourne's Urban Forestry Strategy**

In 2018, a report called 'Resilient Melbourne' was released by the 'The Nature Conservancy' under its Resilient Cities initiative. This initiative is being planned and implemented in conjunction with stakeholders including the State Government and 32 Metropolitan Melbourne municipalities. One of the long term objectives of this report under the heading of 'A healthier Environment' is to:

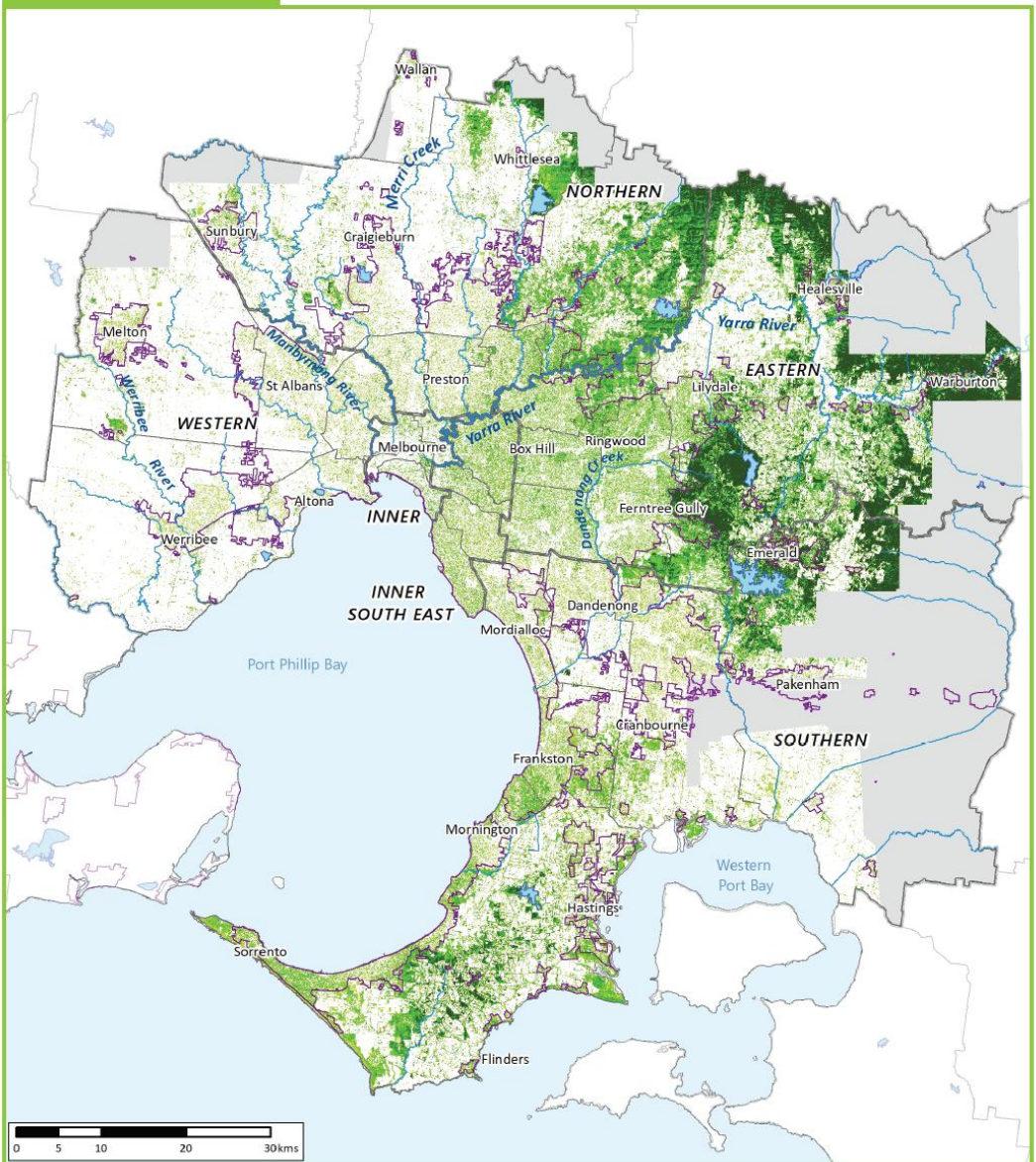
*Enable strong natural assets and ecosystems alongside a growing population.*

In this regard a major initiative released in June 2019 by the Nature Conservancy was an urban forestry strategy called 'Living Melbourne: Our metropolitan urban forest'. It warns that

*Changes in urban form, a growing population and climate change – including increasing urban heat – leave Melbourne's greenery vulnerable, and could severely compromise the benefits derived from urban nature like cleaner air and water, reduced heat and habitat for wildlife.*

A map of the Melbourne Metropolitan area showing Melbourne's urban forest is reproduced below. This map shows a definition of the distribution of canopy cover as measured by vegetation height.





The title of 'Urban forests' could lead to a misunderstanding of the role of the 'rural' Green Wedges. Clearly the Urban Forestry strategy covers the whole of the Metropolitan Melbourne area that encompasses the 17 Green Wedge municipal councils out of the total of 33 involved in planning and implementing the strategy. This is emphasised by Table 2 from the Urban Forestry Strategy is reproduced below which nominates targets by regional groupings of municipal councils that includes all the Green Wedge councils.



Table 2: Targets for tree canopy, and for canopy and shrubs, by region to 2050

Region	Local government authorities	Existing 2015		Target 2030		Target 2040		Target 2050	
		Total % tree canopy	Total % tree canopy & shrubs	Total % tree canopy	Total % tree canopy & shrubs	Total % tree canopy	Total % tree canopy & shrubs	Total % tree canopy	Total % tree canopy & shrubs
Western	Brimbank, Hobsons Bay, Maribymong, Melton, Moonee Valley, Wyndham	4	15	9	20	14	25	20	30
Northern	Banyule, Darebin, Hume, Mitchell, Moreland, Nillumbik, Whittlesea	12	24	17	29	22	34	27	39
Inner	Melbourne, Port Phillip, Yarra	13	18	18	23	23	28	28	33
Southern	Casey, Frankston, Greater Dandenong, Kingston, Cardinia, Mornington Peninsula	16	34	21	39	26	44	30	50
Inner South-East	Bayside, Boroondara, Glen Eira, Stonnington	22	39	24	44	27	49	30	50
Eastern	Knox, Manningham, Maroondah, Monash, Whitehorse, Yarra Ranges	25	44	27	49	29	50	30	50

Note: figures rounded to nearest whole number

The extent of the potential for a substantial detrimental impact can be gauged by the fact that the Green Wedges account for some 68% of the total area of metropolitan Melbourne. More than half of that Green Wedges land is privately owned and there is enormous pressure for built development. Unless there is serious strengthening of Green Wedges planning policy to put a cap on built development, the finding of the ‘Resilient Melbourne’ indicate a serious loss of indigenous vegetation communities.

At present the focus of the Urban Forests strategy is on the middle and inner suburbs. These are obviously very important in reducing the impact of the ‘heat island’ effect in those increasingly more densely populated areas but has a real danger of ignoring potential for overall major loss of indigenous vegetation communities and need for revegetation in the Green Wedges that make up almost 70% of the Melbourne metropolitan areas.

There is a need

- Protect and enhance all existing indigenous vegetation communities in the Green Wedge.
- Implement the policy in *Plan Melbourne 2017-2050* to maintain and enhance the diversity of native flora and fauna habitats and species and **achieve a net gain** in the quantity and quality of native vegetation.
- Expand the current focus of the Urban Forestry initiative under Resilient Melbourne to recognise the importance of the Green Wedges for protecting and enhancing Melbourne’s indigenous vegetation communities recognising that it encompasses the whole of the Melbourne metropolitan area.

## Green infrastructure

Victoria's 30-Year Infrastructure Strategy (December 2016) identifies that 'Green infrastructure' should be considered alongside other infrastructure planning in urban environments. The benefits of green infrastructure include:

- *Providing shade to mitigate the 'heat island effect' to address the challenges of climate change, heat related death and increasing urban densities.*
- *Protecting and enhancing natural environments and supporting biodiversity by providing the critical connections within and between ecosystems.*
- *Reducing emissions and addressing air quality, including acting as a carbon sink.*
- *Providing a more efficient and effective means of managing stormwater to protect against flooding.*
- *Delivering energy savings through natural temperature regulation.*

This supports the need put more funding into programs such as the Urban Forestry initiative discussed above that delivers these benefits.

## Protection of waterways

In addition, Victoria's 30-Year Infrastructure Strategy (December 2016) also identified that:

*An assessment of waterway health by the Victorian Government in 2010 found that 23 per cent of river length was in excellent or good condition, 43 per cent in moderate condition, and 32 per cent in poor or very poor condition. Basins in eastern Victoria had more river length in good or excellent condition compared to the rest of the state (see Figure 16). Soil erosion, land clearing and stormwater run-off are some key factors influencing waterway health. Pressures on inland waterways are expected to increase with population growth and climate change.*

A number of important issues have been identified by community groups working in this area in regard to future land use planning policy and they are:

- Concerns about the effective application of the legal framework provided by the State Environment Protection Policies that potentially provides strong protections for our waterways. For example Clause 14.02-1S requires a 30 metre-wide buffer along each side of a waterway but is this being rigorously enforced? Similarly, *The Healthy Waterways Strategy* needs proactive support from local councils to ensure it translates into real outcomes.
- The need for protection of waterways to be part of all conversations on policy involving land use planning. For example, DELPW's community consultations on 'Protecting Strategic Agricultural Land . . .' (April 2019) did not mention creeks and rivers in its criteria for discussion.
- Need to ensure good communication between government, water authorities, and community in order to achieve better outcomes for our waterways. It has been reported that a frequent scenario occurring is confusion (between local council, water authorities, and land owners) over responsibility for managing creeks and associated buffer zones.

Overall, authorities both State and Local government need to be proactive in working with landowners and informing them of assistance they are entitled to in regard to managing waterways on their properties in order to achieve the objectives of the Victorian Planning Provisions. This is particularly important when applications for subdivision arise, as these provide opportunities to put into place protections for waterways via 173 Agreements and land management plans.

**(D) LEGISLATIVE, POLICY, PROGRAM, GOVERNANCE AND FUNDING SOLUTIONS TO FACILITATE ECOSYSTEM AND SPECIES PROTECTION, RESTORATION AND RECOVERY IN VICTORIA, IN THE CONTEXT OF CLIMATE CHANGE IMPACTS;**

**Strengthening planning policy for the Green Wedges**

The Green Wedges Coalition strongly advocates that the strengthening of the current planning policy for the protection and enhancement of the values of the Green Wedges as recognised by the Green Wedge Zone, Rural Conservation Zone and Green Wedge A Zone is critical to protecting and enhancing the natural ecosystems that are so vital to the liveability and environmental health of metropolitan Melbourne.

**Plan Melbourne 2017-2050: achieving biodiversity targets**

Plan Melbourne sets as its desired planning outcomes for the green wedges and peri-urban areas to:

*Maintain and enhance the diversity of indigenous flora and fauna habitats and species and **achieve a net gain** in the quantity and quality of native vegetation.*

There needs to be a discussion about how this is to be achieved. For example, Clause 52.17 NATIVE VEGETATION currently has as its purpose '**ensuring a policy of 'no net loss' of native vegetation**'. This would seem to be at odds with Plan Melbourne. We do note that under the original Native Vegetation Management Framework when controls on the clearing of native vegetation were first introduced there was a net gain policy.

It is also a concern that trading the protection of a species or ecological community for its removal elsewhere will not halt the decline of that species or community. Environmental offsetting should only be used as a last resort with genuine effort made by a proponent to avoid or mitigate impacts as a matter of priority. Instead as suggested by Professor Sarah Bekessy from RMIT's Centre for Urban Research rather than 'off-sets', developers should be required to improve remaining green space as a form of "on-setting".

The Green Wedges Coalition believes that all applications for built form and associated infrastructure should be subject to a Land Management Plan that clearly demonstrates not only the protection of existing indigenous vegetation but how it will be managed into the future for net gain.