

Draft Local Biodiversity Strategy

Community Engagement Report

2021

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Vision

The City of Kalamunda and its community will protect,
manage and value the local biodiversity
to ensure lasting legacy for future generations.





Executive Summary

The purpose of this community engagement was to investigate community sentiment and perception of the *City of Kalamunda Draft Local Biodiversity Strategy (LBS) 2020 – 2030*, and the data and methodologies used in its development.

Background

The *Local Biodiversity Strategy 2020 – 2030* was created to complement and sit alongside the *Urban Forest Strategy (UFS)*, *Local Environment Strategy (LES)* and *Environmental Land Use Planning Strategy (ELUPS)*; and to replace the existing *Local Biodiversity Strategy 2008*.



The LBS will underpin how the City of Kalamunda (City) will manage biodiversity in the City for the next ten years.

The Draft LBS document is presented in two parts:

- the Draft Strategy in summary**, i.e. the vision, objectives and actions recommended for achieving local biodiversity conservation through land use planning mechanisms and other means.
- Technical information and appendices** including instructions to access the mapping on the interactive WALGA mapping portal, the review report of the *Local Biodiversity Strategy 2008* and describes the rigorous data analysis used to identify areas of biodiversity significance.

Local Biodiversity Strategy

The Kalamunda Environmental Advisory Committee (KEAC) was engaged in the development of the *Draft LBS 2020-2030*. Council subsequently adopted the *Draft LBS 2020-2030* for the purposes of Public Consultation at the [Ordinary Council Meeting, 15 December 2020](#).

Community Consultation for the project was delivered via a *Communications and Engagement Plan* prepared in line with IAP2 best practice principles. The Plan progressed to IAP2 spectrum level 'involve' to work directly with the public throughout the process to obtain public feedback on analysis, alternatives and decisions, and was supported by an integrated marketing campaign.

Community Engagement

- 2017** Visioning workshop and community consultation focusing on the (LES).
- 2018** **93%** (151) of respondents from the community agreed that the City of Kalamunda's bushland, trees and natural vegetation is important. (*Draft LES survey*).
- 2019** **75%** of respondents noted that the City of Kalamunda's bushland, trees and natural vegetation was important, with **55%** highlighting diversity. (*ELUPS community consultation*).
- July 2019** The *LES* and *ELUPS* were adopted by Council.
- May 2020** **73%** (483) of respondents rated the City's "Conservation and Environment Management" positively. (The *MARKYT® Community Scorecard* was commissioned to evaluate community priorities and measure Council's performance against key indicators in the Strategic Community Plan. Invitations were sent to 4,000 randomly selected households).
- Sept 2020** **70%** (237/338) rated Biodiversity conservation as important or very important. (*Strategic Community Plan community consultation - Survey*).
- 2020-2021** **87.5%** of respondents favoured maintaining urban forest and **54%** favoured increased species diversity within the City's streetscapes. (*UFS community consultation*).
- 2021** **Draft Local Biodiversity Strategy released. Targeted community consultation ran from 12 February to 13 April 2021.**



Key Engagement findings

The City issued information regarding the LBS encouraging people to Have Their Say. Content was posted on the City's website, shared with Stakeholders, such as local schools for placement in their newsletters; an advert was placed in the local newspaper; EDM (eNewsletters) were sent to all registered members of Friends Groups (124 email addresses) and City subscribers (1754 email addresses); and the *Strategy* was promoted at the City's Environmental Showcase, held on 11 April 2021.

The Survey received 16 responses and 18 Submissions. It should be noted that many of the submissions were very detailed and represented larger groups of stakeholders.

Social Media received over 15,956 impressions and 407 engagements. Sentiment was positive in response to the draft Local Biodiversity Strategy campaign.

An online poll was held towards the end of the campaign to gain a quick, overall understanding of community sentiment for the LBS. Social Media users were asked to respond using emojis to make it as easy and as accessible as possible. The Instagram post received. **10** x ❤️ = Yes, supportive of the Plan.

Summary of Feedback

Examples of recurring themes across the community feedback included a call for:

- » mapping of current species;
- » reduced land clearing & protection of native vegetation;
- » re-vegetation and establishing meaningful buffer zones and wildlife corridors.
- » enforcement of the strategy and consequences for those not abiding by it;
- » inclusion of First Nations people in decision making;
- » ongoing education of City staff and broader community on native vs feral species, dieback, management etc.
- » better managing urban development/rezoning to protect reserves (feedback currently focuses on Wattle Grove and Cambridge Reserve);
- » management and eradication of feral species;
- » continuing to empower and promote Community environmental groups/programs such as Friends Groups and Plants for Residents; and
- » immediate action - esp. concern over loss of forest canopy.





Community Engagement

Communications and Engagement Objectives

Increase stakeholder awareness of the draft Local Biodiversity Strategy 2020-2030

- » Seek and receive meaningful feedback from the community – including identified stakeholder groups – on the key focus areas and actions proposed in the local Biodiversity Strategy 2020-2030.
- » Increase stakeholder understanding and awareness of the importance of biodiversity to the local (and extended) environment.
- » Promote a positive consultation experience among stakeholders with the City in obtaining equitable levels of feedback from community and residents across the City.

Strategic Planning Alignment

KALAMUNDA ADVANCING 2031 Strategic Community Plan

Priority 2: Kalamunda Clean and Green

Objective 2.1 - To protect and enhance the environmental values of the City.

- » 2.1.1 Local Environment Strategy.
- » 2.1.2 Urban Forest Strategy.
- » **2.1.3 Local Biodiversity Strategy**
- » 2.1.4 Environmental Land Use Planning Strategy
- » 2.1.5 Community engagement and education in environmental management.

Objective 2.2 To improve environmental sustainability through effective natural resource management

- » 2.2.1 Manage the forecast impacts of a changed climate upon the environment

Communications and Engagement tools and objectives

The city engaged with key stakeholders and the broader community via:

Engagement Tools	Objectives
Media Release (MR)	Targeting media outlets for a broader community reach.
Website: Linking to contributing nodes	Accessible, translatable, transparent. Single point reference. Links to Engagement Portal and Social Media.
Engagement Portal	FAQs, Online Survey, additional reading
Printed Flyer and Survey	Print is tangible, tactile, is viewed as trustworthy and reaches stakeholders who are not online. The flyer and survey were distributed across all the City's buildings. eg. Libraries, Rec Centre.
Mail out/ letterbox drop	Directly targeting stakeholders
Social Media Campaign	Targeted posts can reach stakeholders 24/7: Facebook posts, LinkedIn, Twitter, Instagram.
Face-to-Face	One-on-one meetings as required to address stakeholder enquiries.
Email Direct Marketing	Reach City of Kalamunda Subscribers (and for example members of Friends Groups)
Newspaper Advert	Reach broader community who do not have online access
Posters	Visual campaign
Environmental Showcase	The Plan was promoted at the City's Environmental Showcase Event
Content Sharing	Digital versions of content were provide to all local schools with a request for them to include in their newsletters.



An integrated community engagement campaign

The *Local Biodiversity Strategy 2020 – 2030* was created to complement and sit alongside the *Urban Forest Strategy (UFS)*, *Local Environment Strategy (LES)* and *Environmental Land Use Planning Strategy (ELUPS)* as Priority 2: Clean and Green, of the *Kalamunda Advancing 2031 Strategic Community Plan*, and as such, community engagement is interconnected across all components.

Biodiversity engagement conducted via the Kalamunda Advancing 2031 Strategic Community Plan (SCP)

- » Targeted consultation ran from 1 September to 31 October 2020.
- » 162 participants actively discussed the Strategic Community Plan across 10 workshops and/or Advisory Committee meetings. The Community Perception Survey received 338 survey responses and five separate submissions.
- » 81% rated Priority Area 2: Kalamunda Clean and Green as Important or Very Important.
- » 70% (237/338) rated Biodiversity conservation as important or very important.

Community Workshops #1 & 2 (x61 participants)

Wednesday 23 September 2020, 5pm - 7pm

Kalamunda Agricultural Hall

36 People attended

Wednesday 14 October 2020, 5pm - 7pm

Woodlupine Family & Community Centre, Forrestfield

25 People attended

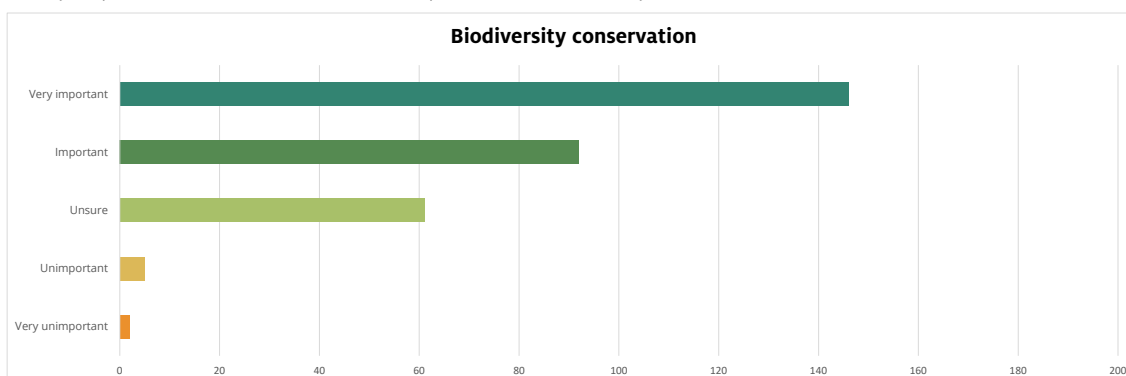
What would you like to see in relation to Priority 2: Kalamunda Clean and Green? Feedback included:

- » Biodiversity maintained
- » Biodiverse streetscapes for our native fauna.
- » A diverse urban canopy
- » Kal has urban Forrest strategy (tree protection on private land = development)
- » Biodiversity maintained
- » Biodiversity – removing pest plants on Council land. i.e.: eastern state wattle (weed) + bridle creeper natural areas managed by Council are weed free + Council are weed free + Council manage effectively + protect endemic species which is what makes KAL unique
- » Types of trees (natives vs non-natives)
- » Clean out the invasive weeds – work out strategy for invasive flora and fauna – educate the community
- » Rest of divs in Wattle Grove and Railway Road are environmentally rich and reflect biodiversity
- » Increasing the tree canopy – “cleaner and greener”

Survey Responses (x338 Participants)

- » Add trees. Stop so much destruction of native bushland. **Allow more diversity in all life forms....** human diversity is not the only form of diversity. Kalamunda is a stunning place to live - it is the forest and hills environment which makes it so. Development needs to be seriously thought about. Supporting local, small and diverse businesses is really important. We already have great coffee, diversity will bring tourists up here to find out what else is great. (SCP Respondent 25)

Survey respondents were asked to rate the importance of Biodiversity Conservation.



An integrated community engagement campaign

Survey Responses (continued)

- » Would love to see some events connected to growing food - permaculture approach for hills gardens that **encompasses biodiversity preservation**. Maybe establishing natural food forests as part of town parks? (SCP Respondent 65)
- » ...maintaining an appropriate balance between development and preservation of land. Too many people are currently cutting down too many trees and **I worry about the impact on our biodiversity**. There needs to be some control. (SCP Respondent 177)

Advisory Committee responses to questions posed included for example:

What would you like the City of Kalamunda to be like in the next 10 years?

- » A leader in biodiversity conservation through maintenance and restoration of nature areas and tree canopy

Describe Kalamunda in 3 words:



Kalamunda Clean & Green - What areas would you like to see focus on in the future?

- » Implement new ELUPS, Biodiversity Strategy and Urban Forest Policy. **Protect significant trees** on both private and public land.
- » Deliver Urban Forest Strategy Plan (and objectives), **Biodiversity Strategy implemented**, undertake WSUD in all civil projects (including development), create a Recycle Shop, invest heavily in planting urban forest, significant tree register
- » We must do MUCH **better in meeting biodiversity targets** ie reserves 'disappeared' and too few given real protection. Love Kala's future commitment to water saving and recycling - great stuff if we achieve it. Canopy is URGENT, so is conserving nature
- » The objective to plan for sustainable population growth needs a strategy with a clearer strategy for what sustainability is considered - eg not only clean energy, but also **meeting biodiversity and threatened sp targets**, infill considering environment
- » Use the information from the lack of implementation of the previous **biodiversity strategy** to guide meeting the targets for the new strategy (and other similar strategies)

Biodiversity engagement conducted via

Priority 2: Kalamunda Clean and Green

2.1.1 Local Environment Strategy 2019 -2029 (LES)

The aim of engagement was to gain an understanding of the community's environment values and priorities. The process provided the opportunity to express views, identify issues and opportunities to manage environment impacts, activities and planned improvements, and to provide feedback on the draft plan.

The LES was adopted in July 2019 at the City's Ordinary Council Meeting following a visioning working shop in 2017 and extensive community consultation.

The draft LES received **23 submissions**.

Comments from the community were generally supportive of the draft LES and they were keen to be able to see its implementation and progress. There was some concern about the length of the document and the clarity of the aims and action tables. The community's concerns were used to inform the final Strategy.

The Draft Local Environment Strategy Vision and Values Survey received **152 responses**.

The Survey was advertised and open to the public until Friday 30 April 2018.

93% (151) of the responses agreed that the City of Kalamunda's bushland, trees and natural vegetation are important.

189

An integrated community engagement campaign

Biodiversity engagement conducted via

MARKYT® Community Scorecard Report

2020 Community Perceptions Survey

The City of Kalamunda commissioned CATALYSE® to conduct a MARKYT® Community Scorecard from 23 March to 14 April 2020. The purpose of the study was to evaluate community priorities and measure Council's performance against key indicators in the Strategic Community Plan.

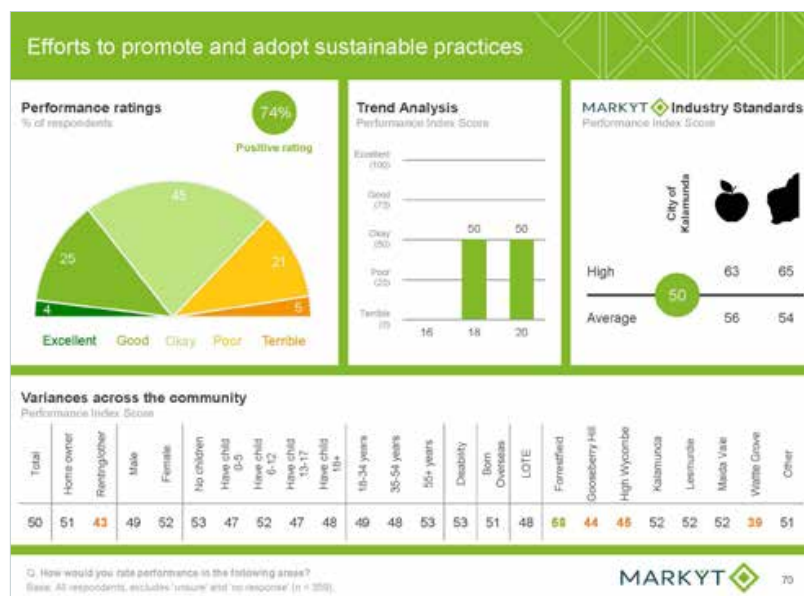
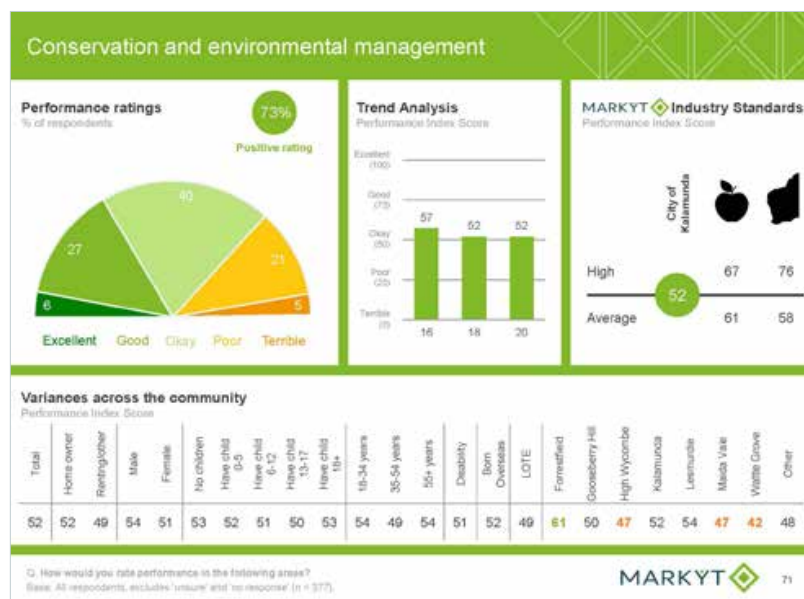
Scorecard invitations were sent to 4,000 randomly selected households; 1,000 by mail and 3,000 by email.

483 randomly selected residents and ratepayers completed a scorecard.

98% of respondents rated the City of Kalamunda positively as a place to live.

Local community recommendations to address top priorities included:

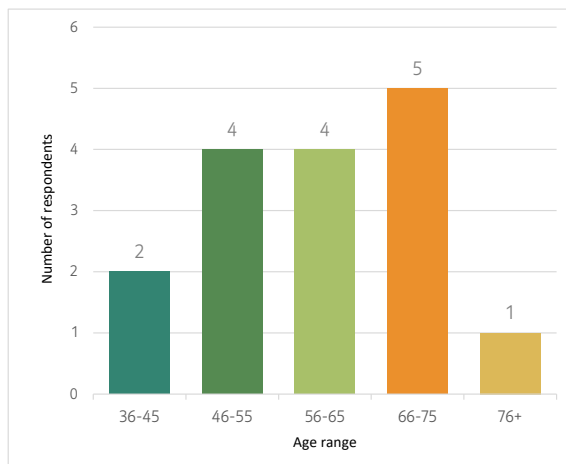
- » Make parks and playgrounds more engaging with more nature areas, youth activities and exercise equipment.
- » Network of mountain bike trails to protect native bush.
- » Proactive and regular maintenance of verges and street trees to improve appearance and safety.
- » Plant more trees; replace dead, inappropriate trees.
- » Create a consistent sense of place, more beautification.



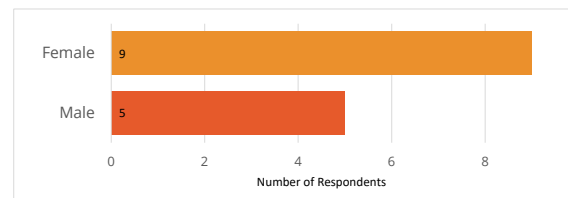
The Charts above show the results in the area of Conservation and Environment Management; and Efforts to promote and adopt sustainable practices.

Engage (Survey) | Demographics

Age of Respondents



Gender of Respondents



The Survey received 16 responses
(In addition, 17 x Submissions were received.)

The survey was a mixture of rating style questions and open comment questions.

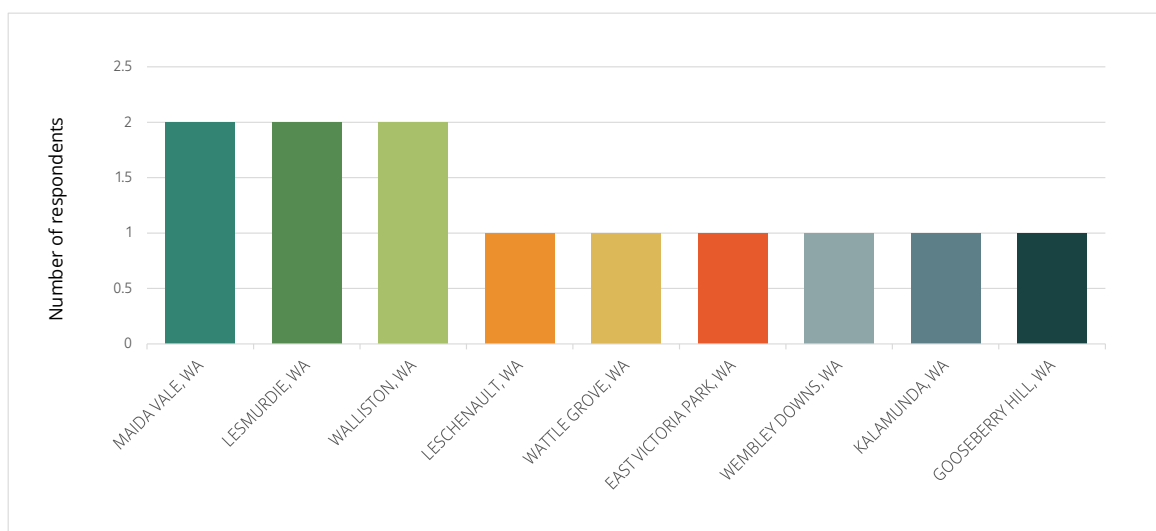
Profile

- 50%** Local residents
- 6%** Business operators
- 12%** Community groups
- 12%** Visitors to the area

Engage Traffic

- 290** Total visits
- 20** Maximum visits per day
- 83** Informed Visitors
- 199** Aware Visitors
- 42** participants downloaded a copy of the Draft LBS Part 1
- 35** participants downloaded a copy of the Draft LBS Part 2

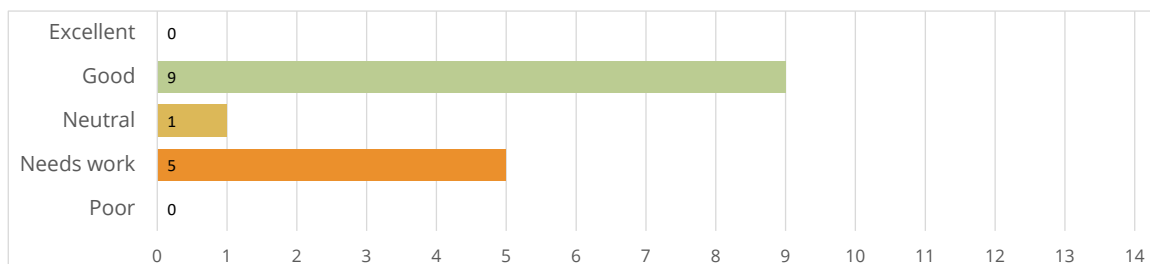
Suburb of Respondents



Engage (Survey) | Overall Rating

How would you rate the Draft Local Biodiversity Strategy overall?

I thought the Draft Local Biodiversity Strategy was . . .



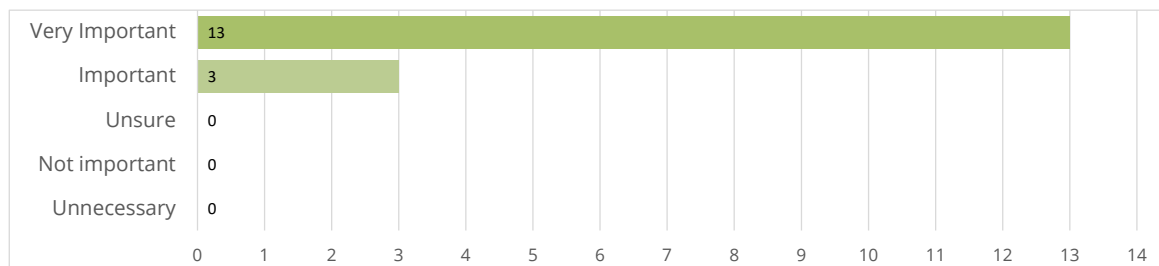
Respondent*	Rating	Reason
1	Good	Very thorough work. However I would like it to be more ambitious regarding amount of native forest protected and preserved.
2	Good	
5	Good	It largely covers the the desired outcomes.
6	Good	I gave this rating because I have noticed a difference between the draft policies and what actually gets implemented, so not excellent until we get a positive 5 year rating.
8	Good	It covered most topics well and showed the strategic direction the City has for protecting local biodiversity into the future
9	Good	The strategy highlights the reality of the immense clearing that has occurred & the importance that the environment is to residents. It's well overdue to make significant change to how the Kalamunda Shire manages it's precious environment. The flora & fauna of the area is what makes this area so appealing and unique yet we are seeing constant development with no regard to the environment.
11	Good	Good detail, actions are achievable
14	Good	If it was enacted it would be exemplary.
16	Good	A lot of research has gone into this, concept of preserving our existing natural bushland
10	Neutral	It is a large document for the general public to access, read and understand. While the document itself, when taken time to understand and digest it, is good
3	Needs work	Good concept, but how will this be governed
4	Needs work	The City has ignored their abysmal record of tree canopy destruction and appears to want to avoid taking action to stop this destruction immediately. Heat Island Effect is acknowledged but then ignored.
7	Needs work	Because C of K wants to destroy Wattle Grove which is rich in biodiversity
13	Needs work	Too many action points. Never achieve them. Need 6 major at most 6 minor at most
15	Needs work	Past performance indicates future performance, i.e the 2008 Local Biodiversity Strategy was not implemented. Many outcome-based actions are unaddressed, e. g. No reserves management committee established, and Private Land Conservation was not developed.
12	-	-

*Note: Text has been included without edits as provided by respondents.

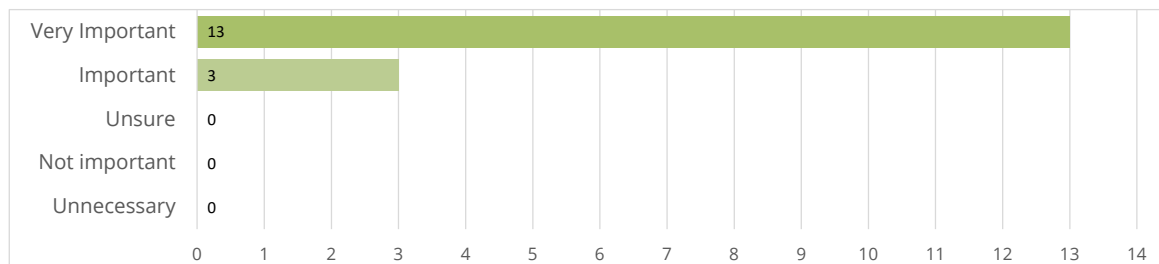
Engage (Survey) | Key focus areas

The Strategy proposes five (5) key focus areas for the City.
How would you rate the importance of the following?

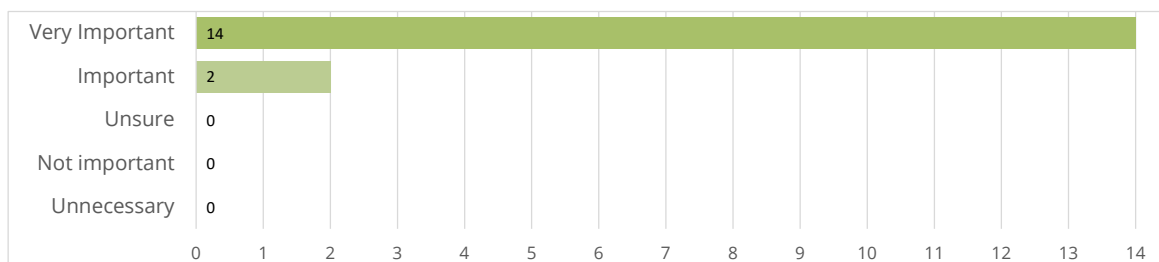
Increase the protection status of priority natural areas in the City, including on Local Government managed or owned lands.



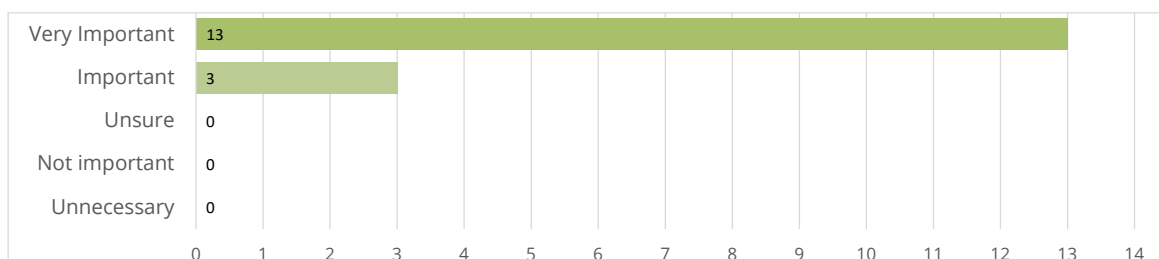
Increase the protection status of priority natural areas in the City, including on private land.



Appropriately manage local natural areas to reduce threats, considering the identified local biodiversity conservation priorities.

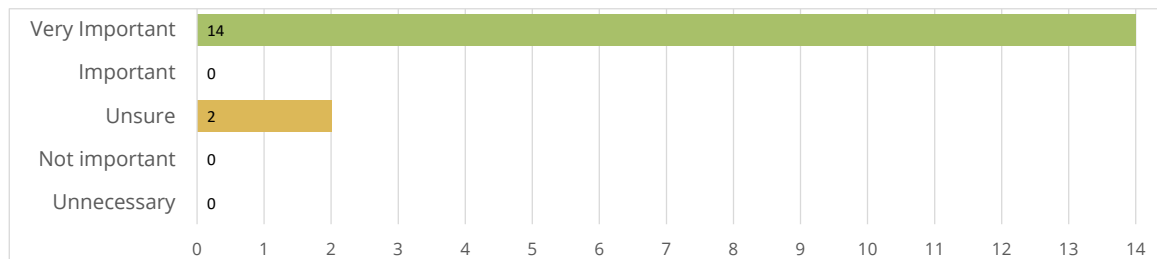


Increase the viability and resilience of natural areas by establishing buffers and ecological linkages; considering the impacts of climate change.

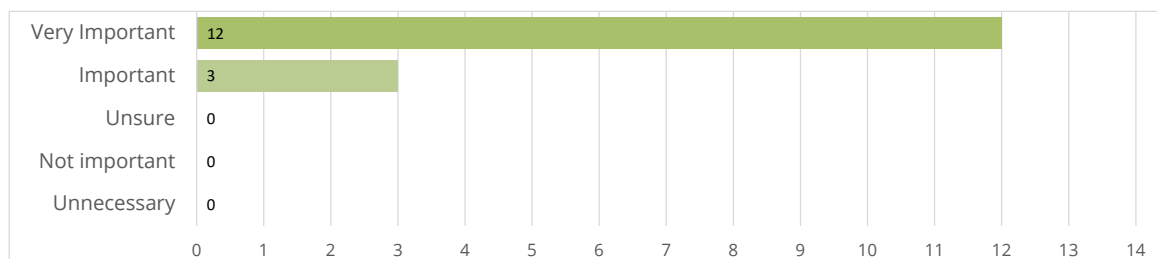


Engage (Survey) | Responses

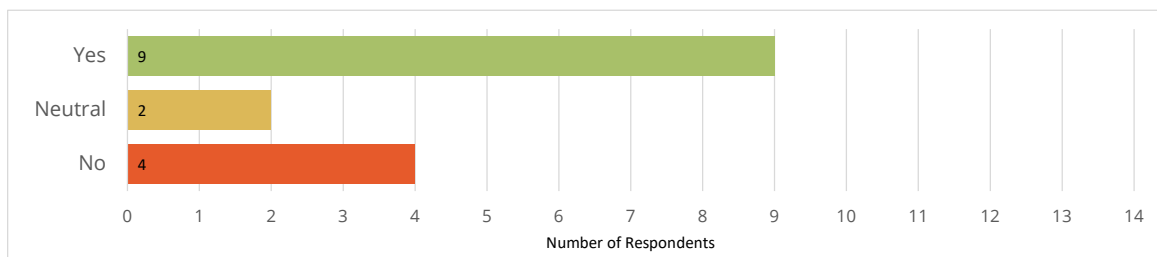
Integrate biodiversity considerations across all areas of City's business and operations.



Achieve long term community engagement in biodiversity management.

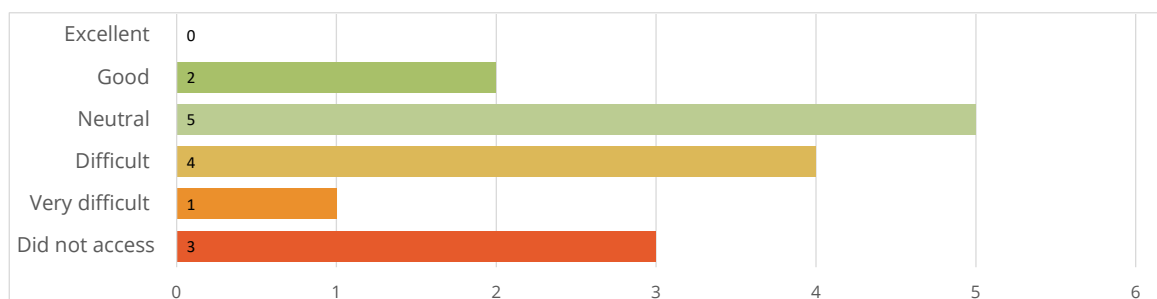


Did you find the Draft Local Biodiversity Strategy summary easy to understand?



How would you rate the ease of use of the web based GIS platform to view the maps? (To access the mapping see the Draft Strategy for login instructions).

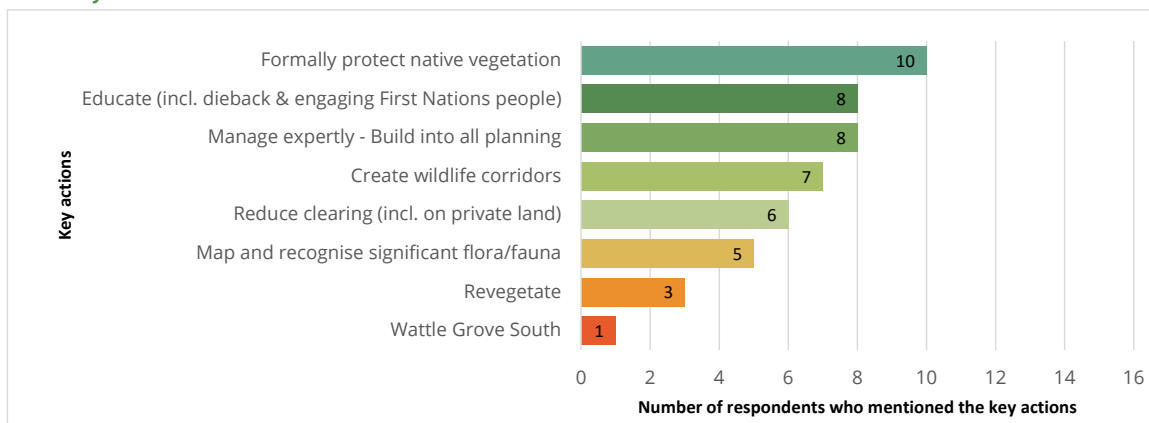
I found the mapping platform ...



Engage (Survey) | Three favourite areas/actions

What are your three favourite areas/actions in the Strategy? Why?

Summary of actions noted:



Responses

Note: Text has been included without edits as provided by respondents.

Respondent	Favourite Area/Action 1.	Favourite Area/Action 2.	Favourite Area/Action 3.
1	P15: Goal to formally protect 500ha of native vegetation to revegetates degraded land. Because this protects biodiversity and forests.	P16. Goal to educate all staff and contractors best practice to reduce dieback spread. Because this protects biodiversity and forests.	
2	Particular departments within the City will be responsible for certain actions.	Protection of Ecological Links/Wildlife Corridors	Reducing clearing.
3	Recognition of significant Flora and preservation	Retention of Natural Bushland both Public and Private	Revegetation with local species of Flora will aid in the recovery of endemic Fauna
4	I don't have a favourite because I feel the City has ignored the whole purpose of the Strategy and is doing nothing to actually protect the existing biodiversity.	ditto above [Left]	ditto above [Left]
5	Protection of more native vegetation	Ongoing establishment of vegetation corridors	Revegetation of degraded or cleared land

Engage (Survey) | Responses

Respondent	Favourite Area/Action 1.	Favourite Area/Action 2.	Favourite Area/Action 3.
6	<p>To increase the protection status of priority natural areas in the City, including on local government managed or owned lands, and on private land.</p> <p>I really like this Action because I have noticed that the number of really big trees that have been removed from my locality have all been on private land. Anything that can be done to influence the retention of this sort of habitat is important. I can see that this would apply right across the City.</p>	<p>To appropriately manage local natural areas to reduce threats, considering the identified local biodiversity conservation priorities</p> <p>Important as in a lot of LNA the threats are currently overlooked, and I have constantly heard people say "but this is not rare or threatened funa/flora," thinking that that makes it OK to remove or manage poorly because it requires more effort to do otherwise.</p>	<p>To increase the viability and resilience of natural areas by establishing buffers and ecological linkages.</p> <p>This is just good sense if we are all really interested in keeping what LNA we have left for the future.</p>
7	Wattle Grove South	Wattle Grove South	Wattle Grove South
8	<p>1.1 Integrate Local Biodiversity Strategy objective, targets and mapping into the City's local planning strategy * This is critical to provide statutory protection for biodiversity within a planning framework. Development is essential for the City's growth but it should not occur at the expense of our amazing diversity - it should occur in symphony with it</p>	<p>4.3 Facilitate discussions with local Aboriginal leaders to investigate opportunities for their involvement in promoting the cultural values of natural areas in the City * This action speaks to the need to allow First Nations People to self-determine and make decisions about the conservation of biodiversity on their Boodja. The City should do more than ask what they want - it should give real decision-making power to local First Nations people and let them decide how to work, where to work and how best to work on their country. Unless we do this, we will only be paying lip service to the reconciliation process.</p>	<p>2.8 Develop and implement a City wide landscaping program (including public open space, compensation basins and streets)- overlapping * By integrating native species as keystone components of the wider parks and gardens landscape, the City would be paying it forward for biodiversity. Future generations will look at a widespread urban forest of native shrubs and trees and know then the City was serious about protecting local species' protecting local character and protecting the clean and green spirit of what Kalamunda is known for across WA and Australia</p>
9	<p>Formally protect areas that are known to have significant flora & fauna on private land. Landowners are felling trees constantly with no regard to the importance to local wildlife. Significant wildlife exists on privately owned land and this land should a) NOT be threatened by urbanisation and b) landowners should be restricted to the clearing and removal of trees.</p>	<p>Mapping of significant plants, animals, wetlands. Highly significant in our foothills at present. It's appalling to see mass clearing in our foothills with waterways and wildlife not being considered. We can't turn things around once it's all gone!</p>	<p>City to engage adequately qualified consultant. And please engage residents - as landowners we have extensive knowledge on what wildlife exists in our area.</p>

Engage (Survey) | Responses

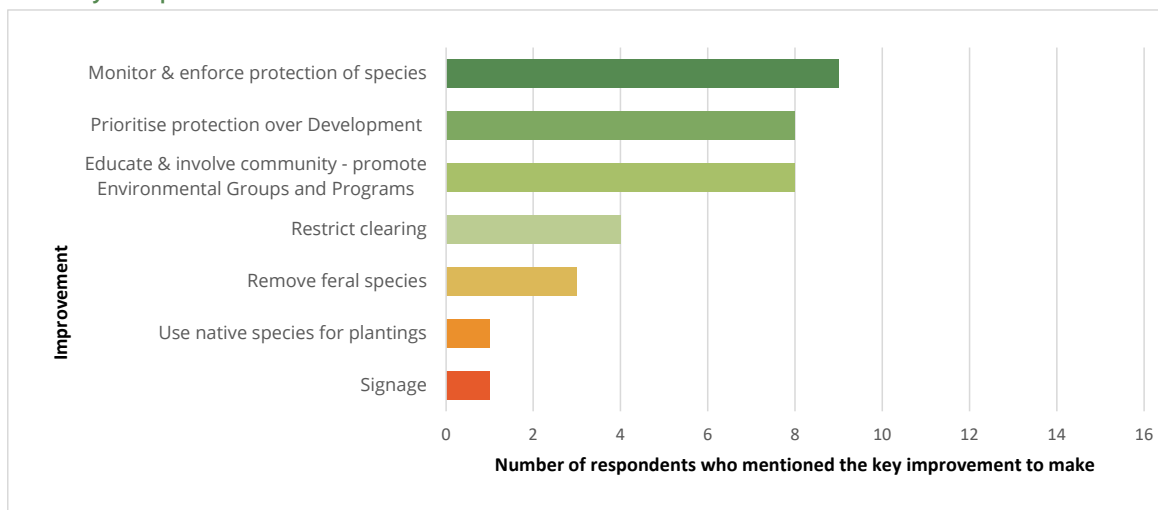
Respondent	Favourite Area/Action 1.	Favourite Area/Action 2.	Favourite Area/Action 3.
10	Protection and monitoring of vegetation: reduce land clearing. Protection of vegetation on private land. The strategy to adequately provide protection to prevent biodiversity loss at the rate of 53 hectares per year.	Protection of ecological communities not currently being protected by current status: greater protection for reserves listed as parks and recreation.	Minimise need for vegetation clearing; plan strategically for connectivity between natural areas for biodiversity corridors.
11	1.1 Integrate LBS integrated into planning strategies. Will give teeth to the LBS	1.3 & 1.4 - Will protect high value reserves and native vegetation on private land and special control areas (ecological linkages) - top work who thought of that.	Action 2.1 - Confirm indicative ecological values etc... You cant manage what you don't understand. Critical first step
12	-	-	-
13	Engaging First Nations elders	Endemic species plantings	Rate payer education
14	This question is not very clear. 1.1 because if the Strategy is not in all planning it will not happen.	All very important but particularly 2.3 and 2.7.	3.2
15	establishing buffers and ecological linkages	integrate biodiversity considerations across all areas of City's business and operations	increase the protection status of priority natural areas in the City, including on local government managed or owned lands, and on private land. Tree protection on private land is most important outcome to legislate (incl. severe penalties for disrespecting biodiversity and killing trees).
16	Recognition of natural bush areas and preserving them	Encourage private landholders within the City of Kalamunda to retain their natural vegetation	Awareness of Phytophthora affected vegetation, precautions and treatment



Engage (Survey) | Three improvements to make

What are three improvements you would like to make?

Summary of improvements noted:



Responses

*Note: Text has been included without edits as provided by respondents.

Respondent	Improvement 1.	Improvement 2.	Improvement 3.
1	I want to see more restrictions on bush clearing.	Where clearing MUST happen, then collect seed first and commission plant nursery help to replant endemic species nearby.	SIGNAGE for dieback infected areas.
2	-	-	-
3	Removal of Woody weeds (i.e. E.S. Wattles) esp. on verges.	Education of Public - plant local species of Wildflowers	Understanding nature of weeds to spread into Bushland
4	Immediately put a hold on any development that does not protect existing vegetation.	Ensure that developers only receive development approval if existing native vegetation is retained and worked around, developers may not like this as they want maximum return for their dollar but it is the only way to protect the environment into the future. It is an inadequate response previously received from CoK to say developers would go to a higher authority and receive approval, be that as it may CoK must be seen to 'walk the talk' and take every possible step to protect our natural environment and the tree canopy.	Stop further erosion of our remaining rural pockets. The State has Pickering Brook nominated as the future development area like Byford was and that cannot be avoided but CoK is responsible for the smaller pockets and stopping wholesale development of those rural pockets.

Respondent	Improvement 1.	Improvement 2.	Improvement 3.
5	Priority given to biodiversity in any development application within all areas controlled by the city.	Awareness that current healthy areas can become endangered and we shouldn't wait for the crisis before acting to protect them.	Increase the retained vegetation on private land in the future from 70% as this is allowing for an ongoing loss of 30% or more of natural vegetation.
6	More follow up on private local natural areas, making sure that corridors are maintained and that there is accountability if they are removed without consent.	Making the ones who have damaged or removed natural flora put it right. I particularly like Mundaring Shire's way of handling this problem, we should be implementing this style. At the moment we are losing important flora that people don't see as important and being left with hot dry and hard surfaces as they are seen as easier to maintain.	
7	Don't touch it	Leave this beautiful area as it is	Listen to We the People
8	I'd like to see some simple break-out 'tips for residents' about what they can do in their backyard to support the more strategic actions the City will take. e.g. "Place small piles of rocks or wood in your garden to provide habitat for local reptiles" or 'Why not make a native bee hotel to encourage native bees into your garden' or 'see pg46 for a list of species that will attract native bees' or 'Consider leaving a small gap in your fence to allow Quenda to move around the neighbourhood' or 'Why not make a small frog pond with the kids and encourage our ground burrowing native frog into your yard' or other short tips	<p>Highlight the great work done by the City since 2008, to maintain the current biodiversity values of many LNA's, e.g:</p> <ul style="list-style-type: none"> » Controlling environmental weeds in over 40 reserves, leading to a reduction in weed cover and an improvement in cover of local species, » Revegetating local reserves for the benefit of biodiversity, e.g. Jorgensen Park, Ledger Rd, Poison Gully, Maida Vale Reserve, Petunia Street Reserve, Gunbar Way reserve, » using ratepayers funds to leverage additional grant money to implement projects. e.g Green Army (\$200,000), Wattle Grove Stage 2 (\$40,000), Jorgensen Park (\$25,000), Woodlupine Brook (\$50,000?) » Highlight the favourable partnerships the City have cultivated with other environmental groups throughout the City, e.g. Nature Reserve Preservation Group, Friends of Upper Lesmurdie Falls, Perth NRM, SALP, GreenSkills, Hartfield Country Club etc. » Champion the Plants For Residents program, which gave away over 250,000 native plants in the last 20 years to residents to support local biodiversity values on private property » Planted native sedges and rushes in many sumps and creeks to provide habitat 	Be real with the community about the projected impact of urban development (in Kalamunda, Forrestfield North & Wattle Grove South) in the near future and identify strategies to mitigate the likely clearing of these areas for development. For example, if Forrestfield North is going to be developed into a more urban area in the next 10 years, prioritise resources to ensure funds for urban forest plantings, corridor plantings and backyard plantings are available. Provide residents with options they can choose to support local biodiversity, and work with developers early to ensure suitable planting palates are available for residents to choose that support biodiversity. Use a strengthened Local Planning Policy, ELUPS and strong commitment from council to fend off low biodiversity outcomes for our future urban areas.

Respondent	Improvement 1.	Improvement 2.	Improvement 3.
9	Reconsider the shires adoption of PP28 - this completely counteracts the biodiversity strategy. The foothills are the gateway to the City and have significant environmental values yet the adoption of this policy will see irreversible damage to the local environment. We need to start seeing actions and not words.	Shire to have more control over developments to ensure retainment of trees, significant buffer zones to waterways, larger block sizes, etc. The 'standard' approach that developers take with fitting as many houses in an area does not fit the environmental focus that the shire is proposing in this strategy.	Implementation of restrictions for clearing and removal of trees on privately owned land. Landowners can make significant impact to this strategy, however they need to be educated and restrictions put in place so they understand the importance.
10	Ensure that this document does not languish on a shelf or become another measure of how much biodiversity is lost in the City in future.	Whilst the City's website has been used to promote this Strategy I believe more publicity could have been given to it: copies of it at local libraries with posters; markets and events held during it comment period. 'Have your say' sandwich boards/ electronic notices.	It is noted that street trees are being planted with 50% to be of local species: Why only 50% what's wrong with 75%. So many native species in Kalamunda area to choose from.
11	Action 2.6 - Reword the action, Better define what needs to be reported.	Dare we be brave enough to put dates on these actions? It is covered somewhat by putting a priority rating but it is something to be considered. Also there is minimal reference to monitoring and how we will monitor the actions, recognise these can be incorporated into the LNA Master Management Plans (2.2 and 2.4) and subject to funding/resourcing.	
12	-	-	-
13	Bit more of a stick / carrot for land holders	Empower , engage and support NFP environmental / land carers	More legislation. Private enterprise can never self regulate itself
14	Emphasise regeneration before revegetation wherever possible.	Everything relating to community involvement should be high priority.	Education and assistance to private landholders vital.
15	All 2008 and current strategy recommendations to be carried out with urgency.	Legislate mature tree protection on private land with severe penalties.	Establishing meaningful buffers, wide buffers around wetland and creeks. Complete ban of "perceived" developments in these buffers (no excuses and exemptions for the benefit of individuals above community outcomes).
16	Remove feral woody weeds from Verges	Encourage Landholders to plant more local provenance plants	Awareness of the impact pet animals can have to the detriment of native animals and birds

Engage (Survey) | Further comments

Do you have any further comments to add?

Respondent	Comment
	Note: Text has been included without edits as provided by respondents.
1	I feel sad and concerned that on average 53 hectares of native bush is being cleared each year just in our City. I am worried about the spread of dieback esp thru Heidelberg Reserve and with the upcoming build for retirement village. Forest is necessary for carbon capture, flora and fauna health and diversity. Also forest is what makes Kalamunda beautiful and unique. The wording on page 15, point 2.4 worries me: "No new dieback infestations are RECORDED within City's conservation areas." should say instead: "No new dieback infestations FOUND within city's conservation areas." as the action of not recording something doesn't guarantee it hasn't happened.
2	The City needs to be proactive with regards to a long term strategy in regards to cat ownership. The phrase "Responsible Cat Ownership" falls well short of what is required. Cats should be inside or in a cat run 24/7. The City should be developing a timeline for such an implementation to give owners time to prepare. At the very least, the City should be asking the question about 24/7 containment of cats to residents.
3	How will these comments result improve in Local Biodiversity
4	PROTECT OUR TREE CANOPY IT'S WHAT 'HOME IN THE FOREST' IS ABOUT yet CoK continues to approve wholesale destruction of our tree canopy.
5	This strategy cannot be allowed to only be aspirational. It must become integral to all future planning decisions and enforced regardless of commercial or other pressures placed on the council. Each individual application has a cumulative impact and cannot be considered in isolation.
6	I just want to see an positive outcome. I have been following several of these Biodiversity programs for a while now and the follow-through by the City is very poor. These things are never seen as popular by the business community but they are important. There are things that should not be considered just on the profits or what resource we can use. We now are standing at a time when, if we don't do enough, the natural areas will just fade and die slowly away and we just won't be able to get them back. I live in this area because of its local natural areas. I know that we will lose something very precious if we don't do enough right now to maintain what we have left.
7	Again, listen to the majority
8	Please make sure that the vision for the strategy - "The City of Kalamunda and its community will protect, manage and value the local biodiversity to ensure lasting legacy for future generations" is more than just a catch cry for what we could do. Support City Officers to understand biodiversity, know how their unit can work to protect biodiversity; and understand how to advise residents about planning and environmental policies that support biodiversity. Fully integrate Biodiversity in the the fabric of the way Kalamunda's staff operate. We'll all thank you for it :)
9	As you can tell I am highly concerned by the development in the foothills. I am worried that the full length of the foothills will become urbanised which will have a grave effect on wildlife in the area, aesthetically does not align with 'living in the City of Kalamunda', and reduces diversity of both the people & landuse of the area. The environment is under threat in the foothills at the moment and I would like the Shire to be more proactive with retaining what is left.
10	Land clearing has occurred at a significantly higher rate since 2008, than prior to the 2008 strategy being in place. The land most under threat is located on the Swan Coastal Plain, and less than 10% of this vegetation remains. Areas in Wattle Grove and Forrestfield are under immediate threat by clearing for urbanisation and require urgent protection.

Respondent	Comment Note: Text has been included without edits as provided by respondents.
11	<p>'Some things to consider.</p> <ul style="list-style-type: none"> - Unsure why there are some actions relating to public open space, wouldn't this be better in the Urban Forest Strategy or the planning strategies? Does this refer to the intrinsic biodiversity values with POS assets? (I.e. a tree....habitat, food, shade?) - Target 2.4 (page 48) - No new dieback infestations - If we increase dieback assessment (Local Environment Strategy action) in our reserves we will be automatically identifying new infected areas increasing the presence of dieback (even though it is the same, we are just increasing our understanding of its current distribution). Perhaps reword this to reflect this. - Page 72 - Actions jump from 3.4 to 5.1 (in table) Page 36 - Threats to the Biodiversity - Climate change? It is mentioned in text directly below the threats table. Perhaps improve its visibility. Isn't helped that the minimal recognition of climate change is split between 2 pages. - Action 2.8 - POS program. Needs to better worded to link it back to the regions biodiversity otherwise why is it included in this strategy?
12	
13	No mention of litter and recycling I could see. Banning fast food outlets in the City!
14	I hope the draft will be well edited again.
15	The City of Kalamunda needs to OWN the outcome of the Local Biodiversity Strategy and be accountable for. And NOT to pass on accountability to third party consultants.
16	As a long term resident in the City of Kalamunda I find that the quality of bushland has deteriorated due to increased urbanisation, fragmentation of bushland, land clearing both public and private, disease, increased infiltration of weeds, unchecked feral animals preying on wildlife, over prescribed burn offs i.e. not allowing time for the bush to recover and regenerate thus losing our biodiversity. Preserving our natural wetland areas,

Submission 1

Note: Text has been included without edits as provided. Personal names of Submission respondents have been redacted, unless they have indicated they were responding on behalf of an organisation/group.

Submission Respondent 1: [REDACTED]

Please find attached herewith my submission to the Draft Biodiversity Strategy prepared by external consultants.

Response to Invited Public Comment on a -

DRAFT 2020 Kalamunda LOCAL BIODIVERSITY STRATEGY.

As a two-term community member of this Council's Environmental Advisory Committee (KEAC) with knowledge in the field of Environmental policies dating back to the 1970s (As official spokesperson on behalf of the British Government at the first United Nations World Conference on Environmental Education) . Bearing in mind the unique qualities of our local Hills environment, continuing growth of awareness world-wide of consequences of neglecting conservation of biodiversity including extinction of vital species; I am convinced that this Local Authority still does not fully recognise the vital role that attentive management of local biodiversity plays in future survival of multiple interacting species, including humans on this planet Earth.

Protection not Clearance.-

Locally we inhabit an area of high future value environment that has many thousands of irreplaceable and internationally unique multiple species in biodiverse communities. Yet this Kalamunda Local Authority seems to treat it with disdain only as a commodity, allowing it to be mindlessly cleared and traded for short term profit of a few to live in compacted urbanised ignorance of their wider surroundings, instead of an area to be protected and enjoyed by all for perpetuity.

An Environmentally aware community.-

That is despite the reality that most of the resident community here are strongly aware and conscious of responsibilities to care for unique natural biodiversity; that was for most the primary attraction for their choice to settle in this extensively biodiverse environment .

Continuing unwillingness of this Local Authority to heed community concern for well over a decade has resulted in extensive further damage through Council-supported development Planning approvals, involving deliberate and continuing extensive clearance of local biodiversity and damage to irreplaceable interconnected wildlife ecosystems.

High level guidance does not over-ride local conditions.-

This apparently wilfully deliberate evasion and inaction by the Local Authority surely cannot be excused by ignorance, or any external imposition of contrary direction from other tiers of Government. High-level policy guidance from WA State Government Agencies for instance has always placed the Local Authority in the role of being expected to properly research and interpret local sites and social applicability for potential future urbanising, but not over-riding the vital considerations of local natural wildlife biodiversity. If the Local Authority does not have that capability it should respond honestly to that effect not disguise limitations.

Demonstrable inaction and evasion of responsibilities for protection and conservation of high value biodiversity as discussed in this Draft, is now almost certain to leave a legacy of higher-risk and damage resulting in extinction of local species; and is a critical indictment of managerial competence by this Local Authority. Particularly in the field of development Planning decision-making.

Shortage of Environmental/ Biodiversity Professionals?

Furthermore, a shortage of appropriate professional staff capability employed to discharge 2 responsibility for biodiversity conservation locally could, but has not been, reported to the relevant State Government Agencies to seek alternative support. So, this Local Authority will inevitably remain on record as being fully accountable for all negative outcomes in adequately managing biodiversity.

Worse still, this Kalamunda Local Authority area is on researched public record (RMIT 2020) as having the largest but one other, for loss of tree canopy in the whole of Australia !

The Draft documentation available for comment is presented as a review and update since the last such overview was posted as a public Policy Document in 2008 and draws attention to essential detail, but also exposes some of the accumulated consequences of what has been substantially ignored in terms of necessary action by this Local Authority.

Community input ignored and Council misled.-

This City and Council can still find on public record frequent Community input made by deputations and other related responses to Councillors alerting to inaction on aspects of biodiversity - far too often ignored, or sidestepped by use of 'Surveys' summarised for extreme brevity in bar charts that are often misleading through 'guiding' participant responses to selected topics preferred by the Administration, but inhibiting and evading personally preferred responses. (The inadequate ELUPS in 2019 is a recent case in point.)

The Draft Paper is useful coverage but not in the local context persuasive as a 'Strategy'.-

At a level of generality, the document is useful coverage of relevant issues but is insufficiently persuasive as a future 'Strategy' for this particular Local Authority that has not been predisposed to actively address the serious issues of conserving high futures-value local biodiversity.-

While the suggested Action Plan has some merit, it is obviously not feasible with existing levels of appropriately skilled professional staff with experience of managing unique biodiversity; and is far too focussed on Planning (meaning commercial/ urbanising development planning), that should definitely be a secondary consideration to active conservation of biodiversity. Why? - because in terms of future economic development, the biodiverse areas of Perth Hills accessible from already highly urbanised Perth and the international airport for local, interstate and particularly incoming international eco-tourism, are of much higher potential value than more local urban development.

(That is with the exception of the northern Foothills areas close to the new Rail station that have already been cleared of most remaining biodiversity.)

Alternative Proposals for Action to implement a new Biodiversity Strategy for City of Kalamunda.-

- a). Make a number of new staff professional staff appointments including one at Director level, all with experience of researching and managing unique biodiversity at a local level.
- b). Develop much more extensive practical engagement with community at all ages that is both educational and practical first-hand, relating to both flora and fauna in the Region .
- c). Plan and prepare for extensive on-going regular 'State of Environment' analyses and reporting. 3
- d). Active participation through both internal and external 'networking' in rewriting a local Environmental Land Use analysis that is Biodiversity Conservation rather than development Planning orientated.
- e). Prepare a series of larger scale terrestrial and biodiversity maps that are sufficiently detailed with static features such as roads, to be easily understood by community. Progressively tracing the presence, feeding and breeding habitat; and movement of native animals, birds and local occurrence of rare flora. Also, the natural movement of surface water and identifying risks of unintended damaging pollution into zones of unique biodiversity.

f). Share information with neighbouring Local Authorities where local biodiversity overlaps legal boundaries.

However, before implementing a new Strategic framework for action, this Local Authority must honestly contemplate -

1. Whether it is truly capable of continuing as formal custodian of the unique and complex local Perth Hills biodiversity in terms of-

a) Having an appropriately skilled and experienced team of professional staff at a sufficiently senior level in the Administrative hierarchy to guide, manage and deliver on-going permanent protection of fragile and unique internationally recognised local biodiversity covering an extensive varied landscape. (That certainly could not be assured by the occasional employment of external consultants, who are not continuously engaged in confronting changing practical pressures at a very local level.)

2. If it is demonstrably unable to do so - (Perhaps being frank that as a functioning provider of many basic local Services that are already under pressure from intense urbanisation in the Foothills) City and Council must be prepared to openly admit that to the State Government and seek alternative assistance, such as from the Department of BCA.

Footnote:

The writer is already on local record as being in the process of developing a multi-purpose Wild-life Discovery and post-school Environmental Learning Centre.- Based for future economic development reasons in Kalamunda, preferably close to the History Village and Zig Zag Visitor Centre. This will be partly focussed on attracting international rapidly growing 'eco-tourism' as soon as international air travel resumes post-Covid. It will also be a proactive base for local biodiversity-support Volunteers and has the already promised engagement of bio-research staff from UWA; and already negotiated broad agreement to link with the Kanyana wild-life recovery centre currently based in Lesmurdie bushland. This multi-functional Centre has received keen encouragement and support in principle from Mark Webb Director General of BCA. A novel inclusion will be live-filming and recording of local native Fauna most of which is rarely seen due to being secretive and nocturnal.

[End]

Submissions 2 & 3 | EcoVision

Submission Respondent 2: EcoVision (Gail Evans)

Subject	Formal Submission of EcoVision response to the draft Local Biodiversity Strategy
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To all Councillors and Staff,

The draft Local Biodiversity Strategy shows conclusively that the only significant opportunity that the City of Kalamunda has left to protect the remaining biodiversity in the City is to take decisive action to prevent the rezoning of rural land within the City, including in Wattle Grove South. Councillors should therefore act in the best interests of the community to do just that.

Yours sincerely,

Gail Evans

SWAN ANIMAL HAVEN ASSOC. INC.

A.B.N: 67 343 755 405

714 Welshpool Road East, WATTLE GROVE WA 6107

Submission Respondent 3: EcoVision (Bev & Charles Dornan)

To: Cr Margaret Thomas; Cr Dylan O'Connor; Cr Cameron Blair; Cr Brooke O'Donnell; Cr Geoff Stallard; Cr Janelle Sewell; Cr Lisa Cooper; Cr Sue Bilich; Cr Lesley Boyd; Cr Kathy Ritchie; Cr Mary Cannon; Cr John Giardina; Rhonda Hardy;

Subject: EcoVision Submission to the 2020 Kalamunda Local Biodiversity Strategy

Dear Mayor, Deputy Mayor, Councillors and CEO

Please find attached a copy of the EcoVision response to the draft Local Biodiversity Strategy currently out for public comment. We do hope that you find this to be compelling reading. We would particularly like to draw your attention to Appendix B of our submission in light of the Council decision taken on 24 November 2020 in relation to Wattle Grove South. Appendix B clearly illustrates the extent of the 'disconnect' between that Council decision and the need to protect what little remains of the biodiversity of the City.

As you might expect, our community is highly motivated with respect to protecting the environment in the WGS foothills and we will continue to bring our concerns to the attention of relevant government Ministers and agencies, as well as other like minded community groups. We hope that Councillors will act decisively to protect the City's rapidly diminishing biodiversity.

As always, if any Councillor wishes to clarify any aspect of this submission, please feel free to contact us. The published Vision and Values of the City ought to mean that councillors, city staff and community are all on the same page with respect to environmental matters but instead, we continue to encounter difficulties. Hopefully the views of all will accord with respect to what is to be done in relation to the draft Strategy because its recommendations are very clear.

Kind regards

Bev and Charles Dornan, Coordinators EcoVision

Note: The following EcoVision document was submitted separately by Respondent 2 and Respondent 3.

EcoVision Position Paper Re Draft Kalamunda Local Biodiversity Strategy

What Went So Wrong?



*View of Wattle Grove South from Lions Lookout on the Darling Scarp. Photo courtesy Graham Ryan
March 2021*

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Overview

Thank you for the opportunity to comment on the 2020 Draft Revision of the *Kalamunda Local Biodiversity Strategy 2008*.

The draft shows that damage to the environment within the city has reached crisis proportions, with local government mismanagement wholly to blame. It contains shocking revelations that are important for the public to know – and for the council to remedy.

Most significantly, it states the city has protected a mere **2.2 hectares** of local natural areas since 2008 while wiping out **730 hectares** of biodiversity over the same period. This is a shameful record for successive council administrations that falsely parade 'green credentials'. It can be neither justified nor allowed to continue.

Further, the draft follows a recent report that the City of Kalamunda has one of the largest reductions in tree canopy cover of **all** local government authorities **in Australia** over the past 4 years (*Royal Melbourne Institute of Technology, 2020, Where will all the trees be*).

It is possible to conclude from the draft that:

The biggest single impact in the environmental disaster that is unfolding is the city's failure to adopt **any** local planning policies focusing on biodiversity (draft, p. 3).

The greatest single opportunity to protect what little biodiversity remains is illustrated in Figure 2 of the technical report – **retention of existing rural zonings within the city** (p. 51).

This submission addresses three key areas:

- A. Biodiversity data and loss of tree canopy
- B. Organisational mismanagement
- C. Zoning and environmental values.

In addition to the overarching areas noted above, our key comments include recommended improvements to the Strategy related to providing:

- » greater focus on reporting actual outcomes rather than somewhat nebulous targets
- » clear and unequivocal linkages between environmental values and majority community opinion
- » transparency about what the city is committing to do, and how it will measure success
- » recognition that listing proposed actions is no substitute for accountability and the introduction of strict compliance mechanisms.

We do not intend to offer a response to all proposals raised and where we have not dealt with an issue this does not imply that we agree with it.

Bev & Charles Dornan

Coordinators, EcoVision

About EcoVision

EcoVision is a registered Town Team within the City of Kalamunda. The group evolved from a community campaign to resist industrialising up to 310 hectares of foothills Wattle Grove.

Many residents who supported the campaign have since aligned themselves with the environmental values and direction of EcoVision and continue to receive updates from the coordinators on matters of common interest.

Residents of foothills Wattle Grove who are aligned with EcoVision are fiercely protective of their community and make no apology for placing biodiversity and the natural environment at the top of our agenda. In the face of climate change, it is a supreme social value that needs to be carefully protected.

Draft Biodiversity Strategy 2020–2030

In February 2021, the city released a *Draft Local Biodiversity Strategy 2020–2030* for public comment.

This Strategy, which underpins how the city will manage biodiversity in the city for the next 10 years, comprises a review of the previous biodiversity strategy adopted in 2008. The draft was prepared for the city by Nam Natura Consulting. It comprises a 143-page technical report with 7 appendices and an accompanying 21-page summary.

Unfortunately, the finding that the council has failed to adopt **any** local planning policies focusing on biodiversity **since 2008** suggests this Strategy, like its predecessor, may not be worth the paper it's written on.

A. Biodiversity data – a clean sweep

The term 'local natural area' describes any physical area that contains native species or ecological communities in a relatively natural state and hence, contains biodiversity. Once disrupted, such areas can never contain the same level of biodiversity as the natural community that would have once been present in that area, especially in an ancient and diverse landscape like Western Australia.

In order to protect biodiversity, which is the variety of all living things, the city purported to have adopted the following 'vision' in 2008:

The City of Kalamunda and its community will protect, manage and value the local biodiversity to ensure lasting legacy for future generations.

This vision was designed to give our city a better future. However, new figures reveal the extent of successive councils' failure to live up to their promise.

i. Clearing at a rate of 53 hectares a year

The draft (Appendix E, p. 3) shows that the city has protected a **mere 2.2 hectares** of land of conservation value since 2008. On page 5 of the appendix, it cites Department of Biodiversity Conservation and Attractions (DBCA) figures which show that at the same time over **730 hectares** of native vegetation has been lost, including areas mapped as threatened ecological communities (TECs). These TECs provide vital wildlife corridors and habitat refuges for many plant and animal species, including threatened species and other Australian plants and animals that are in decline. This behaviour is problematic and possibly illegal.

Of the total 23,552 hectares of native vegetation remaining in the city, only **2445 hectares** is classified as local natural areas (technical report, p. 12). Even more important, destruction is accelerating.

Overall, the draft shows that native vegetation is disappearing from the city at a rate of **53 hectares annually** (that is, every year between 2008 and 2020), even worse than the rate of vegetation clearing recorded between 2002 and 2008 (19.6 hectares a year) (summary, p. 8).

This abysmal record is compounded by overall loss of tree canopy in the city. As stated above, the city recently attained the dubious distinction of having one of the largest reductions in tree canopy cover of **all** local government authorities **in Australia** over the past 4 years (Royal Melbourne Institute of Technology, 2020, *Where will all the trees be*).

Further, the city's *Environmental Land Use Planning Strategy 2019* baldly acknowledges that in the past 10 years High Wycombe has lost over 71% of its tree canopy cover and Forrestfield has lost over **65%**.

This disastrous situation has developed despite **Priority 2** of the city's *Strategic Community Plan Kalamunda Advancing 2027* requiring the city to 'deliver environmental sustainability and maintain the integrity of the natural environment'.

Despite repeating this commitment in various iterations of the plan since 2013, the city still managed to achieve nationwide ecological infamy in the 2020 RMIT study, confirmed by data in the current draft strategy.

ii. Diminishing trust

The evidence base shows significant gaps between the green credentials claimed in city publications and the reality on the ground.

Further contributing to diminishing trust in the democratic process, the current council is pushing ahead with plans to allow urban subdivision of 350-plus hectares of Wattle Grove South, an area almost the size of Kings Park, Perth's premier tourist attraction (see case study at **Appendix A**). This attempt at rezoning is occurring over 75% resident opposition and without any legislative imperative.

Indisputable ecological surveys have identified 14 ecological communities, 51 flora species and 26 fauna species of conservation significance in the contested area. The draft strategy also observes that both significant regional and local ecological linkages traverse the area.

Rezoning the area to urban will remove most (if not all) obligations on land developers to preserve irreplaceable biodiversity and wildlife corridors (see **Appendix B**).

The draft shows that residents of Kalamunda are faced with more threats in more places than at any time since the original strategy was developed.

Residents have been distracted, perhaps deliberately, by popular low-level conservation activities occurring on the 35.6 hectares of city-managed land while wholesale destruction of the environment has been sanctioned by a voting bloc on the council who favour unbridled development. For example, in November 2020, 7 elected council members voted in favour of urban intensification in Wattle Grove South.

It would be hypocritical of this council to proceed with a biodiversity strategy if it clearly has no intention of supporting it – as has been the case for the past 13 years since the 2008 strategy was adopted.

iii. Role of developers



The *Environmental Protection Act 1986* contains provisions designed to regulate the clearing of native vegetation. However, these provisions **do not apply** to areas that are approved for urban subdivision.

By definition, rezoning rural land to urban requires the destruction or degradation of scarce natural habitat. It also requires compact housing so dwellings can be sold to as many people as possible. Supply and demand is the engine behind this story.

Unfortunately, opportunities for developers create conditions in which it is profitable, for a time, to crush local communities. The draft shows that the council and land developers are two sides of the same coin.

Developers have little regard to the needs of the people living in the area, inflicting lasting damage to local ecosystems. As they see it, everything and everyone inside the development area are disposable. However, new sources of information and local empowerment mean that hopefully, the life span of such exploitation is contracting, particularly as awareness of the impacts of climate change on our community grows.

B. Organisational mismanagement

The council comprises elected councillors and administrative officers. Under our democratic system, councillors and officers have different but complementary roles. Both serve the public but officers are responsible to the council, while councillors are responsible to the electorate.

Importantly, the officers' job is to stay in the background and offer impartial guidance and support – **not seek to influence** the councillors' choices. If they omit relevant facts in their reports, the idea of an independent council is tainted. When officer reports present biased or insufficient information to the council, and the council doesn't do its own homework, we're in trouble.

EcoVision has previously exposed the failure of officer reports to present the full environmental story to the council for decision-making. It now appears the authors of the draft have fallen victim to the same strategy.

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The draft, albeit a desktop study, makes no reference to the existence of crucial environmental surveys of foothills Wattle Grove carried out by the AECOM consultancy. The AECOM report, which was commissioned by the council and delivered in February 2020, confirmed that Wattle Grove South contains **significant environmental attributes** (see **Appendix B**).

Despite this earlier fieldwork being of **utmost importance** to the consultancy brief, it appears the information was not supplied to Nam Natura, as it does not appear in the list of references cited in the technical report. This means either that the reference list is incomplete, however unlikely, or that the city administration did not provide all relevant information for the consultants to consider. Either situation would be a disgrace.

i. Lack of accountability

The council's betrayal of residents' wishes may not always have been intentional. The environment cannot be maintained unless councillors deciding on land use can be assured that officers genuinely take it into account when preparing their reports. Under the current administrative structure, **no such coordinating mechanism exists**.

The city's *Information Statement 2020/21* states that the city has three directors who are directly responsible to the chief executive officer (CEO), who is the most senior officer within the organisation.

The directors oversee the running of the three service areas – Corporate Services, Development Services and Asset Services. All staff employed by the city are responsible to, and report to, the CEO.

Within Assets Services, the city employs 4 FTE equivalent staff that form a dedicated Environmental Services Unit (draft, p. 20), who maintain and care for city-managed land. However, this unit is excluded from land-development considerations.

The stark result (p. 5) is that the 2008 biodiversity strategy with its proposed targets and implementation actions **'was not used effectively [either] to support land-use planning decisions or to increase the protection status of identified significant natural areas in the city'**.

Further, the city failed to '... adopt **any** Local Planning Policies focusing on biodiversity protection' (Appendix E, p. 3), despite the draft recognising that planning and development was the **single greatest factor** contributing to habitat fragmentation and loss of biodiversity in the city.

The city's *Local Planning Scheme No. 3* identified **13** areas across the city where land-use provisions changed after 2008 – all providing for higher intensity development **with limited provisions for vegetation retention** (Appendix E, p. 6).

On 23 February 2021, city officers presented *Local Planning Policy 28* related to structure planning to a council meeting **without** also informing councillors that the proposed policy would have an impact on Priority 2 Kalamunda Clean and Green. This was a blatant omission, either deliberate or the result of inadequate backroom coordination.

Similarly, in November 2020, an officer report was presented to council in relation to the proposed urban rezoning of Wattle Grove South. This report inexplicably omitted **all** reference to Priority 2, which seeks to ensure the protection and enhancement of the natural environment of the city.

As stated above, vital regional and local ecological linkages across the city referred to in 2008 have become fragmented and degraded (draft, p. 61). Even the city's *Environmental Land Use Planning Strategy* (ELUPS), adopted in August 2019, does not refer to ecological linkages but simply 'focuses on public landscape management to maintain the City's identity'.

This skewed organisational structure, which is the responsibility of the CEO, seems to go a long way to explaining the persistent failure of successive councils, including the current council, to embrace the vision and values for which they were elected.

ii. Weakness in annual reporting

Lack of accountability extends to the city's communications with residents. Nowhere is this more on display than in the city's *Annual report 2019–20* where, for instance, the 'Message from the CEO' asserts:

We are courageous in our endeavours to ensure environmental protection and sustainable development which results in the creation of connected communities that generate sustainable growth within our City (p. 5).

Even more worrying is the CEO's misplaced pride in announcing that:

We have driven the rezoning of key areas of rural land within the city ...(p. 5)

In reference to the first instance, the draft Strategy shows that environmental protection was not attempted, let alone achieved. In the second instance, rezoning of rural land flies in the face of Priority 2 and yet continues over the objections of the majority of residents. Together, these omissions on the one hand and actions on the other pose a serious, urgent threat to our democratic process.

The draft Strategy makes it clear that only by **protecting the remaining rural areas** in the city from intensified development pressures can the rapid loss of biodiversity be halted or slowed.

In a second instance, the Annual report selectively highlights environmental activities within the city. In the 'Priority 2' section, the report highlights worthy and successful community efforts in the 35.6 hectares of city-managed land but **disregards** the overall failed outcomes in the larger picture revealed in the draft.

iii Neglect of Priority 2

Strategic community plans are the highest level document that all local governments prepare. The *Kalamunda Advancing 2027 Strategic Community Plan* outlines the values, aspirations and priorities for the local government over the next 10 years. Priority 2 in the plan reads as follows:

Kalamunda Clean and Green: delivering environmental sustainability and maintaining the integrity of the natural environment.

City-wide surveys repeatedly show that ratepayers value the natural environment – in particular, **Priority 2 above all other priorities**. In recent times, 97% of respondents in the city's 2017 and 2019 community surveys said that the city's bushland, trees and natural vegetation were important and 96% wanted to see the integrity of the local natural environment protected and enhanced (City of Kalamunda, 2019). The city's abysmal failure to honour these commitments is highlighted by data in the draft showing ongoing loss of biodiversity (and tree canopy).

Further, on 27 July 2018, the city forwarded a submission to the state government's *Green paper to reform the WA planning system*. In authorising this submission, then councillors took the position that when considering development proposals, it would always prioritise environmental sustainability and social benefit over the short-term economic benefit for a few. Even a cursory analysis of the 2020 draft reveals nothing could be further from the truth.

'Environment' is an easy word to say in any language. Without councillors making a genuine commitment, however, it risks becoming a general incantation more or less deprived of practical meaning. Saving a 'significant' tree or two on land not wanted by a developer is not 'caring for' the environment nor is hand-wringing over the loss of tree canopy. The numbers in the draft must jerk even the most reluctant of councillors into an awareness that they cannot continue to hide from their responsibilities nor conceal their actions from electors.

The fact remains that despite all documented environmental undertakings, **only 2445 hectares of local natural areas remain** across the entire city. If councillors do not take immediate action, in a very short time there will be no LNAs left to protect.

This conclusion is supported by the summary (draft, p. 8) which states:

*All the issues listed in the 2008 Kalamunda Local Biodiversity Strategy as threatening biodiversity in the City of Kalamunda remain relevant in 2020. Habitat loss due to vegetation clearing and degradation continues to be an issue. Rate of vegetation clearing recorded in the City since 2008 was greater than in the previously assessed period; with a rate of 19.6 hectares cleared annually between 2002 and 2008 and **a rate of 53 hectares cleared annually between 2008 and 2020** [emphasis ours].*

There is perhaps some slight opportunity for reason to prevail. For example, the mapping of threatened and priority ecological communities provided by the DBCA (March 2020) identifies that the majority of vegetation on the Swan Coastal Plain portion of the city – which includes suburbs such as Maida Vale, High Wycombe, Forrestfield and Wattle Grove – are TECs, and yet, these suburbs have been and are still being subjected to urban intensification on a scale that has resulted in devastating tree canopy and biodiversity loss.

On page 16, the authors of the draft declare that **opportunities still exist to increase the local protection of vegetation on rural lands in Gooseberry Hill, Maida Vale, Forrestfield and Wattle Grove**. Seriously, this priority cannot be made any clearer.

To prevent community trust in the council from eroding further, it is vital that councillors cease acting wholly in harmony with short-term developer interests and instead act immediately to protect remaining vegetation and other biodiversity across the city to maintain a good quality of life for all.

C. Zoning and environmental values

With the release of the draft, large cracks have appeared in the trust people had previously placed in the democratic process of local government and the council.

Many residents and their families chose to live in areas that are zoned rural and special rural in order to enjoy the quiet, low-density, leafy environment that is afforded by those zonings. Most residents see themselves as faithful custodians of this land in terms of protecting the biodiversity on their properties. This way of life is increasingly under threat but **not** because there is any shortage of land earmarked for urban development.

Urban Monitor 11 (Department of Planning, January 2020) calculates that it would take approximately **62** years to consume all of the land already zoned for urban development across Perth. This availability means that there is **no systemic** pressure to destroy the environmentally sensitive foothills now, or ever.

i. Urban free-for-all



The record shows that in not a single instance since 2008 has a change to land-use provisions in the city included mechanisms, legally enforceable or otherwise, to fully protect the natural environment, including tree canopy. Indeed, under 'urban' zoning, **all protections are removed**, notwithstanding so-called appeals by councillors for prospective developers to 'consider the environment' in their plans.

In fact, the city's *Local Planning Scheme No. 3* identified **13** areas across the city where land-use provisions changed after 2008 – all providing for higher intensity development with **limited provisions for vegetation retention** (Appendix E, p. 6).

In short, in none of the 13 areas where land-use provisions were changed was retention of vegetation assured. On the contrary, clearance of vegetation and degradation of the environment continued to accelerate, at a rate of 53 hectares per year.

Sadly, the voting bloc of councillors have shown through their actions that they remain wilfully blind to the environmental disaster unfolding in the city.

Their performance disregards overwhelming opposition from residents and irrefutable scientific evidence of significant environmental attributes, particularly in Wattle Grove South. The draft itself refers to the fact that 'the strong local desire for environmental protection is well supported by scientific research' (p. 6).

It is a simple and necessary story of logic and science, in an age of responsibility.

ii Bulldozed

None of this evidence has deterred hurried attempts by the council to pursue urbanisation of a large part of Wattle Grove South ahead of a slated state- government review of zoning, which is expected to prioritise the environment over more intensive development.

On 24 April 2020, the Assistant Director General of Planning informed EcoVision that such a review would take into consideration residents' wishes and the significant environmental attributes of the foothills area. The council's decision is therefore both premature and ill-advised.

Councillors who have supported urbanisation may try to maintain the illusion of our city's green credentials, but the effects of their behaviour, which are toxic to our community, are laid bare in the draft.

As shown above, council land-use decisions – historical and current – consistently prioritise developer interests at the expense of ratepayers and the environment. And instead of showing a genuine willingness to listen to critics and making an attempt to restore community trust, some remain impervious to reason.

They have ignored alarms raised in submissions and at a series of public meetings by residents, civic groups, environmental supporters and renowned environmental scientists, relying on discredited officer reports instead. Not to know about the effects of their decisions now is a moral choice, not merely an innocent ignorance.

By their actions, not only have councillors failed to alert the public to environmental damage but they have also taken actions to conceal it.

While the release of the draft Strategy lays the record bare, it also offers a path of redemption to those councillors who may not have realised they were part of something doing far more harm than good for the city.

D. What can be done?

In the court of public opinion, the council has already been injured greatly. Although a policy reversal cannot now guarantee the survival of our critically endangered flora and fauna, it could still maintain, improve and protect our neighbourhoods and the chosen lifestyles of affected residents, whether residential or rural, now and for generations to follow.

While we don't wish to undermine the council's efforts that have benefited the community in many areas (particularly in city-managed lands), the draft confirms that for over a decade the council has been unwilling to exercise its responsibility to protect our environment overall. Of this, there can be no doubt. The data in the draft and other documents (at least available to, if not heeded by) councillors is indisputable.

The obvious practical reforms appear to EcoVision to include the following:

- » Individual councillors should embrace the attitudes and values for which they were elected.
- » Dysfunctional local council governance should be improved, perhaps as follows:
 - » create a new Executive Director, Environment position
 - » amend key performance indicators.
- » The council should declare a moratorium on rural rezoning proposals.
- » The CEO should (a) be instructed to prepare a submission from the city to the proposed Department of Planning review of the NE Sub Regional Framework in 2021, and (b) ensure the submission reflects the desire of the community to retain the current rural zoning for Wattle Grove South on account of the area's known environmental attributes and other considerations.
- » The council should improve the quality of their communications with the public.

i. Embrace electors' values

Over-reliance on local government staff has seen the reputation of the council fall to its lowest ebb, particularly as none of the relevant staff seems to have the formal credentials in environmental studies required for meaningful analyses of technical data.

Far safer, councillors seem to think, to follow a 'recommendation' (i.e. play along) than to exercise their own judgement. These councillors appear to have disconnected from the interests of residents and transferred their allegiance to the influence of city staff and land developers.

While this imbalance has been reflected by successive councils since at least 2008, it's time for it to change. The problem remains however that not all councillors appear to have values in place to guide them in their own decision-making.

So it was with relief that EcoVision noted some apparent softening of attitudes at a Special Meeting of Electors held on Tuesday, 16 March 2021. Councillors actually seemed stunned by the findings of their own draft biodiversity strategy report.

Hopefully, all councillors may in time come to see that protecting what little is left of the biodiversity of the city is the only legacy of their time spent in public service that is worthwhile.

ii. Improve governance

As mentioned throughout, the root problem with the council appears to be governance, or the lack thereof. The city's *Information Statement 2020/2021* states that the four operational and functional areas of the council's organisational structure are to be guided by the CEO.

If the CEO is unprepared to bring about coordinated action on conflicting land-use and environmental policies, then a new leadership position of Executive Director, Environment, with a commensurate staff allocation, should be created to do so.

Further, the Corporate Business Plan should be amended to ensure that key performance indicators (KPIs) for all senior executives are amended to reflect the required environmental accountability.

iii. Declare a moratorium on rural rezoning proposals

The council's response to the draft Strategy must include a moratorium on rural rezoning proposals that are in the works or being contemplated until such time as councillors and residents can fully assess the impact of land-use changes on the environment.

This is particularly important given Figure 2 on page 51 of the technical report that indicates that the greatest opportunity to protect biodiversity and ecological linkages within the city is through the **retention of rural zonings**.

The moratorium will also give current councillors time to reflect upon past decisions where they may have relied unduly on inadequate or discredited staff reports.

Councillors are entitled to, and must always insist upon, reports from officers that are comprehensive, complete and impartial as the basis for good decision-making.

It is inconceivable that the directors of a multi-million dollar agency would allow such decisions to be made without doing their own homework. We repeat, such decisions are no accident. They are a choice.

iv. Support residents in state government review

The North-East Sub-Regional Planning Framework establishes a long-term and integrated planning framework for land use and infrastructure in north-eastern suburbs, including Kalamunda. The state government is expected to review the framework this year.

Instead of pursuing an unbridled development agenda, the council should restore faith with residents by adopting a true conservationist position regarding the review.

In particular, the council should:

- a) instruct the CEO to prepare a submission from the city to the proposed review
- b) ensure the submission reflects the desire of the community to retain the current rural zoning for Wattle Grove South on account of the area's known environmental attributes and other considerations.
- c) ensure that the remaining rural areas of the city are equally protected from urban/industrial/commercial subdivision.

The council has so far ignored the specific desire of the community for greater environmental protections. We believe council members are obligated to follow the electors' instructions, not pursue their own purposes.

This review is an excellent opportunity for councillors to show they have moved on and become what electors expect.

v. Eschew weasel words that hide the truth

When words are used in local government to hide the truth or misrepresent the facts, everybody suffers – the council, which loses credibility, and electors, who are kept in the dark. Using 'weasel words' allows the writer to later deny any specific meaning if the statement is challenged, because the statement was never specific in the first place.

To keep faith with electors, the council should ensure that its communications (e.g. media releases, presentations, reports and workshops) use plain language ('plain English'). At the very least, it must cease using bland or uninformative language that conveys no real information or, for that matter, as in the most recent annual report, that misleads readers into believing that rezoning rural land is to be applauded rather than deplored!

As shown at the Special Meeting of Electors this month, the community expects the council to fight the universal instinct to use 'weasel words' as shields against attack or as camouflage to escape detection. Far from encouraging their use, the council has a duty to be open, transparent and honest with electors at all times.

E. Other observations on the draft

- » The summary document fails to highlight the seriousness of the lack of progress in protecting the environment in the City of Kalamunda and ought not be relied upon as a true reflection of the technical report.
- » There is no mention in the draft of the AECOM ecological surveys, RMIT findings or pertinent climate change data.
- » Desktop analysis would have been more useful if actual fieldwork case study had been used for illustrative purposes, for example, the AECOM fieldwork.
- » Maps are so broad-brush as to be meaningless. It is almost impossible to identify localities using major roads and/or suburb boundaries. A magnifying glass is needed to read the hard copy and at least one map has no key.
- » Finally, the review lacks in-depth analysis of organisational dysfunction that is the cause – or at the least a major contributor to – the environmental disaster that is unfolding in our city.

F. Conclusion

The public is starting to realise that exaggerated hyperbole about protecting the environment, in contradiction to what is actually happening, discredits local government as a whole, the city and its councillors. We trust that the draft becomes the catalyst for much-needed change.

The days of environmental destruction on steroids in our city must cease forthwith.

The draft exposes the full scope of the problems in the city. It is our hope that councillors who have made poor land-use decisions on the basis of inadequate information in the past can be brought to see how far they have let themselves (and us) down.

Had the draft not exposed the extent of the damage, it is unlikely that councillors would see the necessity to change their behaviour on their own. Individual councillors need to self-reflect to determine whether they have contributed to the loss of habitat in the city and, if so, whether they genuinely want to address community concerns and redress the harm done. If not, they should resign.

A strategy is no magic wand. It cannot transform a pro-developer into a champion of the environment. But this draft shows that at least 7 current councillors have failed to live up to community expectations, just as councillors have failed before them.

In short, the process of creating a new Biodiversity Strategy must **either** be officially brought to an end by this council, and declared a failure, **or** councillors must recover their courage and support electors in seeking to preserve what little remains of local natural areas within the city, including within Wattle Grove South.

This draft requires decisive action. Unfortunately, wringing of hands over the loss of tree canopy is a manifestly inadequate response. It will neither protect the purported green credentials of a councillor nor contribute to achieving the city's published environmental targets.

A councillor's obligation is to lead – but not blindly and not in harmony with minority interests. They must realise there is no safety in the old way of doing things. Indeed, an overreliance on bureaucratic expertise is specifically highlighted as a major driver of local government inefficiency in the Mankall Foundation paper released in February 2021, which states:

Inexperienced councillors, unrepresentative voting systems and an overreliance on bureaucratic expertise are among major drivers of local government inefficiency, according to new research from Mannkal Economic Education Foundation.

Given recent inquiries and renewed whole-of-government commitment to the environment, pushing ahead with environmental destruction is sadly out of step with the times, and likely to do irreparable harm to the city's reputation.

EcoVision can only argue that if councillors don't act to represent the true interests of electors, then the task should be placed in the hands of others who will.

Appendix A – Wattle Grove South case study

In 2018, the council proposed to rezone a 350-plus hectare area of Wattle Grove South industrial. Due to a high level of community opposition, this move was defeated. In 2020, the council proposed to rezone the area urban. This move also engendered a high level of community opposition that continues to this day.

The city's Governance and Policy Framework underlines the council's obligation to the people who elected them: 'Democratic governance exists when a government governs for and on behalf of its community', and 'Policies and programs [reflect] the mandate Councils have been given by their electors'.

The council seems not to acknowledge their obligation and duty in this area.

Further, the officer report on the issue to councillors did not mention that rezoning would potentially (or inevitably) affect the solid environmental aims of Priority 2. It was as if this key council priority (as stated below) had never existed. We believe that this omission had the potential to undermine proper decision-making by councillors.

Priority 2 Kalamunda clean and green

2.1 To protect and enhance the environmental values of the City

2.1.1 Enhance our bushland, natural areas, waterways and reserves

Urban subdivision will have the direct effect of removing all regulated environmental protections from a known unique biodiversity hotspot (see **Appendix B**) in the city with its criss-crossing regional and local ecological linkages, all simply to provide economic rewards to a developer with no affinity for the area.

A review of the 2020 Local Biodiversity Strategy recognised that planning and development was the **single greatest factor** contributing to habitat fragmentation and loss of biodiversity in the city.

Council administration (and the 7 to 3 majority of councillors) seem determined to ignore the fact that the vast majority of electors oppose the proposal, and they continue to keep rejecting or ignoring criticism.

All eyes now turn to a proposed review of the state government's North-East Sub-Regional Planning Framework, which covers the City of Kalamunda, due later this year.

It is expected that state government officers would take their responsibilities much more seriously than most of the current city councillors who appear to consider

themselves entitled to design their own city regardless of residents' wishes.

Appendix B – Biodiversity in Wattle Grove South

1. AECOM consultancy

The City of Kalamunda is part of the South West Australia Eco-region, one of Australia's 2 global biodiversity hotspots and home to a variety of unique flora and fauna that are under serious threat.

In December 2018, the City of Kalamunda engaged AECOM consultancy to conduct environmental surveys of foothills Wattle Grove purportedly to inform future planning directions. The city chose to describe the study area as Wattle Grove South and published the resultant AECOM surveys on the city's website in March 2020.

The AECOM ecological surveys identified 14 ecological communities, 51 flora species and 26 fauna species of conservation significance in the survey area which is approximately 350-plus hectares – almost the size of Kings Park.

It reported a total of 192 vertebrate and invertebrate fauna species have been recorded within the survey and surrounding area, including endangered red-tailed black cockatoos, Baudin's cockatoos, Carnaby's cockatoos, and the local native diggers – quenda (bandicoots).

It identified a minimum 730 breeding and potential breeding trees and speculated that this number was likely to seriously underestimate the case. In addition, the AECOM authors recommended that all trees in the study area be retained wherever possible, observing that mature trees take decades to establish and as such should be considered high value.

2. Professor Stephen Hopper AC

UWA Professor Stephen Hopper was WA's first state government flora conservation researcher (1977–1992) and then Director of two world-class botanic gardens – Perth's Kings Park 1992–2004 and the Royal Botanic Gardens, Kew in London 2006–2012.

In 2012 Professor Hopper was awarded the Companion of the Order of Australia (AC) for eminent service to as a global science leader in the field of plant conservation biology, particularly in the delivery of world class research programs contributing to the conservation of endangered species and ecosystems.

Professor Hopper read the AECOM survey report and stated (with our added emphasis):

The report reinforces that you live in an environmentally sensitive area indeed. It encompasses one Commonwealth threatened ecological community (TEC), three WA listed TECs, one threatened plant listed by WA and the Commonwealth as vulnerable (*Conospermum undulatum*), two Commonwealth and WA listed threatened Cockatoo species and their foraging and nesting habitat (730 breeding and potential breeding trees were recorded), plus Quenda (a WA Priority 4 – monitoring – species).

I note that the consultants had to sample the area, rather than survey it in its entirety, and point out, therefore, that additional TECs and threatened species habitat may exist on unsurveyed private properties.

I see merit, on this evidence, on retaining the area as Special Rural zoning, rather than urban intensification.

3. Dr Alex George AM

Dr Alex George received an Order of Australia (AM) in the honours list announced on 11 June 2012 for service to conservation and the environment as a botanist, historian and author, particularly in the area of Australian flora, and through roles with national and international professional organisations:

Dr George, Adjunct Professor Murdoch University, also read the AECOM report and commented:

These surveys provide an in-depth description of the physical and biological attributes of the area. They are comprehensive except in covering just 96 of the 262 properties within the designated area. Access for survey to those omitted was declined by the owners.

The area lies largely on the Ridge Hill Shelf complex that, even at the time of foundation of Western Australia in 1829, did not cover a large area and has been impacted severely by development. The complex occurs only along the foot of the Darling Scarp in the Perth Metropolitan Area. **It contains vegetation and flora that occur nowhere else.** As noted in the report, less than 6% of the original area retains its natural vegetation.

The report confirms the richness and importance of the flora and fauna of the area.

It is likely that the unsurveyed properties contain examples of the rare flora and significant fauna habitat that contribute to the total biodiversity value of the area. Each property would contribute in providing habitat

(shelter, food, breeding sites) for animals. Birds, insects and other animals that are an integral part of the natural environment move between these patches for their own well-being and survival, and in so doing ensure pollination of native flora and, to some extent, dispersal of seeds.

Given that there is no land within the survey area that is reserved for the purpose of conservation, **it is vital that the remaining pockets of natural vegetation be retained, otherwise a unique example of the State's biodiversity will edge close to extinction.** Landowners in the area should be advised of the conservation value of their properties and encouraged to manage them for the long term.

It should be stressed that it would not be possible to offset the area with bushland elsewhere since, as stated above, **there is virtually nowhere equivalent in its landforms and biodiversity.**

The report provides a sound baseline against which future surveys may be monitored. Landowners might be given copies and asked to report sightings of fauna, new records and seasonal changes in plants, and efforts to control weeds.

In 50, 100 years' time, residents (and the City) will look back and commend the present generation for its foresight and wisdom in retaining the natural attributes of the area.

It is interesting to note that Dr George discovered a new species of banksia in the Wattle Grove South area in 1972. Unfortunately, due to uncurbed development, this species is no longer seen in this area.

A third WA environmental scientist has identified deficiencies related to the methodology used in the survey which, in her considered view based on prior knowledge of the area, would have resulted in the surveys most likely **understating** the environmental significance of the area.

In summary, the AECOM environmental survey confirmed that Wattle Grove South contains **significant environmental attributes**, including the existence of rare flora and endangered fauna as listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* and the state *Environmental Protection Act 1986* and yet extraordinarily, 7 councillors still voted to facilitate the destruction of this environmentally sensitive area.

The city paid \$43,500 for AECOM to conduct these ecological surveys of this area and yet officers did not see fit at the time to inform councillors that adopting their recommended action to facilitate future urban subdivision of the study area, with block sizes as small as 300 square metres, may well impact on the city's ability to achieve Priority 2 or the targets identified in the draft *Local Biodiversity Strategy*.

Nor does it appear that officers informed Nam Natura Consultancy, the consultants responsible for preparing the draft strategy, of the existence of the AECOM surveys as shown by the reference list in the technical report, despite this earlier fieldwork being of utmost importance to their consultancy brief.

It appears to residents aligned with EcoVision that the city administration has deliberately sought to downplay the significance of the AECOM findings, as it has made no secret of its desire to facilitate future urban subdivision of Wattle Grove South.

Attempts to rezone this environmentally sensitive area by city administrators have been relentless, despite the opposition of 75% of affected residents and without any legislative imperative requiring rezoning.

In light of the serious findings of the draft Strategy, councillors would be remiss in fulfilling their legal obligations as councillors not to question why the city has deliberately sought to downplay the significance of the AECOM ecological findings in relation to determining future land use in Wattle Grove South, keeping its existence from the consultancy group and making no mention of it in the *Annual report*.

As stated in the draft Strategy, urban subdivision of this area would have the direct effect of removing all regulated environmental protections from a known unique biodiversity hotspot in the city with its criss-crossing regional and local ecological linkages, in favour of a developer with no affinity for the area.

Unfortunately, an environmentally destructive council decision in relation to future land use in Wattle Grove South serves only to illustrate the inherent hypocrisy of the city pretending concern for the environment through the adoption of an updated biodiversity strategy.

This is especially the case because the technical report makes it clear (although in more temperate language) that the previous version of the strategy merely provided a fig leaf for the city's long history of environmental vandalism.

[End]

Submission 4 | Mick Davis

Chairperson, WA Landcare Network
Committee Member, Kalamunda Environmental Advisory Committee
Secretary, Nature Reserves Preservation Group
Committee Member, Friends of Upper Lesmurdie Falls Inc.
City of Kalamunda Resident

Submission 4: Mick Davis

Dear City of Kalamunda,

I would like to commend the City and its staff for preparing the Draft Biodiversity Strategy. I have completed the online Survey and offer the attached additional comments on the Strategy, for your consideration.

Sincerely,

Mick Davis

Comments on Summary


Pg	Section	Item	Comment
	General		<p>The format of this document is quite different than that of the 2008 one, which has a very logical flow and is clear to understand.</p> <p>Providing the new 2020 document in two parts is a little confusing and it feels like the first part is very over-arching, while the second part is heavy technical reading. Can the two documents come together a bit more, with elements of the technical data included and presented in an easier to read/understand way?</p>
	Acknowledgement of Country		<p>Could the document include an acknowledgement of Country from a respected Noongar Elder, or Elders? This would be consistent with the City's RAP and provide a context for the following actions and recommendations within the report in relation to engaging with First Nations people.</p>
Other		Dieback	<p>There needs to be an increased understanding of the methods of spread of dieback in all the City's maintenance teams, supported by a process where staff apply for an internal 'permit' to do works in LNA's. This would provide a clear understanding of where works occur in dieback free and dieback infested areas, and allow signage, vehicle control and reporting to occur</p>
		Firebreaks	<p>A coordinated approach to maintaining, upgrading and establishing new firebreaks needs to be implemented. There appears to be no strategic approach that is well communicated in advance to the environmental team. Provision of a forward schedule would allow issues like spread of dieback, erosion control, engagement with friends groups and potential to use suitable</p>
			<p>topsoil for restoration projects. Further, additional fragmentation of reserves should be carefully considered given the known impact (Technical Report Appendices, pg 44), particularly when considering installing firebreaks through the middle of reserves.</p> <p>Where this is required, a clear policy of installing 'Forestry Mulched' access tracks should be prepared.</p>
		Prescribed burning program	<p>A 5-year strategy for fuel reduction, with a 1- yearly implementation plan, should be prepared, to assist the Environmental Team to manage impacts from fire risk reduction works to reduce impacts on local biodiversity. No-planned-burn areas should be considered, and training provided to Fire Crew and SES Volunteers on how to reduce the impact of prescribed burning on biodiversity</p>

Comments on Technical Report

Pg	Section	Item	Comment/Recommendation
5	Para 3	"...and over 630 hectares of native vegetation lost (Appendix E)."	This figure includes all bushland, including private property where development has occurred, outside the legal control of the City. This should be clarified, and the quoted area of lost vegetation modified to reflect that lost only on City managed lands, as it appears to misrepresent the role of the City in managing and protecting its lands.
5	Para 4	"...The key achievements of the City..."	There is no mention of other activities like support for local community groups, significant revegetation projects like Ledger Rd Reserve and Poison Gully. This paragraph is severely under done and makes it look like the City has done effectively nothing apart from form a team and produce a few pamphlets. Please add more detail and do justice to the City staff and volunteers who worked so hard during this time to protect their bushland reserves.
10	Figure		This figure provides a great overview of the strategic context of the LBS and should be integrated into the main public document, not be hidden in the appendices please
12	Para 3	"The Strategy seeks to identify least cost opportunities for improving the protection status and condition of local natural areas and facilitate engagement with relevant stakeholders."	The term 'least cost' should be re-phrased to be 'cost effective', so as to show that the strategy is looking for good value for money, not just trying to save money or find a reason not to do some activities. There should also be some mention of how the City plans to leverage Ratepayer funds through grants to effect more benefits for Biodiversity.
12	Para 4	"...Local Natural Areas are defined as..."	Suggest this could be made into a figure and incorporated into the main report. This concept is fundamental to people understanding what areas will be governed by the LBS
12	Para 4		Further, this paragraph identifies the areas which will be managed, and so these should be added to the main report in a map covering the whole of the City, showing City managed lands, so people can see where the City's influence is highest, compared to private lands
20	Para 5	"DBCA's NatureMap (January 2020) lists 984 indigenous and 222 naturalised (weed) plant species' records for the City of Kalamunda."	The CSIRO supported Citizen Science biodiversity Atlas of Living Australia identifies a total of 2,188 (not 1,206) species as being present in the City of Kalamunda. This figure should be refined, or at least mention additional species known. DBCA do not hold ALL the information, and CSIRO are reputable. Link to data is at https://regions.ala.org.au/...Kalamunda
24	Para 1	"DBCA's records (January 2020) show 52 records of fungi in the City..."	Atlas of Living Australia identifies more than 62 species of Fungi as being present in the City of Kalamunda. This figure should be refined.
		Additional	Include some detail on the recently provided survey of Native Bees in the City of Kalamunda, undertaken by Kit Prendegast. Include some photos in the report as well if possible.

Pg	Section	Item	Comment/Recommendation
24/28	Table		Noting the Black-tailed Cockatoos, it is possible to get some current 2021 high level data from Birdlife Western Australia on the known roosts within the City of Kalamunda. This map would make an excellent addition to the main strategy document, given the role these species play as a Flagship species – rallying support, interest and funding in the wider communities eyes. The current map is hard to read – should have the City boundary as the dominant layer
32-36	Table		Would be great to add another column to this table, showing which of the actions proposed in the Action Plan will address each of these threats. Otherwise there is no connection between these two tables.
40-42	Table		Scoring here is ecologically critical. I suggest a scale of scores should be available within the Criteria score, rather than either a zero or top score. This would tease apart significant differences between LNA's at the micro level.
42	Para 3	"Low prioritisation scores cannot be interpreted as those areas not containing significant biodiversity."	The problem is, they will be. So can this be rephrased or described in a different way. Clearly, LNA's with high scores will get more attention/funds etc than those with lower scores. This is a critical issue and should not be buried in the Appendix
43	Map		This map should show the individual LNA's mapped as polygons, so it is clear where they are, and that they sit apart from private property and Other Govt estate
46	Last Para	"...with least cost opportunities..."	As before, this terminology is either very specialised or inappropriate. Please consider changing the phrase to "best value for investment" or "highest return on investment opportunity"
47	Para 4	"...the importance of some non-indigenous plants like pecans or macadamias to native animals can be considered..."	I would like to commend and support this suggestion. Occasional, strategic planting of high energy nut trees can have a significant benefit to Black Cockatoos and there should be an action specifically in the Action Plan about planting Macadamia's, almond's etc across the city in low traffic areas to support black Cockatoo feeding resources
47-49	TABLE 11: LOCAL BIODIVERSITY CONSERVATION TARGETS.	Target 1.1	The How To Achieve should include some educational processes for councillors and residents, to explain the need for protection and the opportunities that this action presents. Without political support, the action may well be politically difficult to pass through council
		Target 2 section	Suggest adding a point to include installation of dieback status signage in all reserves managed by the City
		Target 3.3	Suggest re-wording this target to reflect the desire for tree canopy to be 30% in all areas of the City. Currently, if SCP canopy cover is 15%, and additional 7.5% would only result in canopy cover being 22.5%, below the suggested target.

Pg	Section	Item	Comment/Recommendation
48		Target 4.4	<p>Section 5.2.3 doesn't go far enough in explaining how consideration of biodiversity protection will be integrated into all of the City's business. This section should include an additional:</p> <ul style="list-style-type: none"> » Staff training program » Forms to complete for entry and exit of vehicles, planned works or prescribed burning etc » Opportunity to levy activities that impact biodiversity to contribute to a Biodiversity Fund » Make staff and contractors attend Green Card dieback training » Apply a fee during development for impacting biodiversity values, as an 'offset' opportunity » City to provide contractors with training on identifying local species so off-target damage does not occur during weed control activities
58	Para 4	Special Control Area	I'd like to support the provision of a Special Control Area in the City's Local Planning Scheme
		"...Require a planning approval to remove native trees on private land..."	For dot point 1 in this part, suggest that removal of trees further than 10m from dwellings still require a permit. Allowing the phrase to be 'for fire risk management purposes' is too loose and will not protect trees well enough. Often people will remove trees, but not consider managing the fuel below them.
60		Update of the City's Public Open Space Strategy (2018)	Definitely need to update this document to include better identification and recognition of biodiversity values in public open spaces across the City
61	Last Para	Point 2	Remove Manager. Discussion was with Coordinator Natural Areas, Consultant and Environmental Team Staff
64	Figure 10	Cambridge Reserve	Given the plans for Aged Care and urban development in Cambridge Reserve, Forrestfield, I suggest the area of this LNA be re-adjusted to exclude the area planned for development. This will allow the relevant scores to be calculated and re-projected into this map and future planning for protecting its high conservation value.
65		5.2.2.2 MANAGEMENT OF BIODIVERSITY ON PRIVATE LAND	<p>To date the biggest issue with managing biodiversity on private land is the concern by residents on the potential impacts of land value/development with such a policy.</p> <p>Suggest making an action to provide details to councillors and residents on the way these two values can co-exist. Without the political will to implement change/protections, policies to protect biodiversity on private land will not be passed by council.</p>
68	Last Para	Friends Groups	If the Friends Group program should be a highest priority, it should be mentioned first in this section. Suggest bringing this paragraph to the top of this section to demonstrate its importance.
69 -	Action Plan Table	2 Local Government Natural Area Management	Suggest flipping priorities for 2.1 and 2.2. Although mapping seems like the most important action here, having a master plan first, then implementing it makes more sense to me
		2.5	Fauna monitoring is usually a specialised job and therefore I suggest it should be outsourced to consultants where possible



Pg	Section	Item	Comment/Recommendation
		2.8	Need consultation here with Parks maintenance team to ensure that the proposed biodiverse plantings can be adequately maintained into the future with the staff, plant and equipment they have available.
		5.4	Suggest actions in this table are integrated into InterPlan reporting and Staff Job Descriptions to allow continuing assessment of progress towards goals. This follows the review of the 2008 LBS stating that little was done and progress was not monitored.
	Appendix C	TABLES C-1 & C--2:	Suggest names of the reserves are included where possible, as well as their R-Code and LNA numbers
	Appendix C	2008 LBS review	Suggest removing this from the 2020 LBS and providing it as a separate document to avoid confusion and reduce 2020 document size
	Appendix F	CITY OF KALAMUNDA RESERVES PRIORITISATION	This is great. A clear and concise summary of the reserves and their relevant priorities. Suggest providing some info/a key on what the relevant cell and text colours mean
	Appendix G		Suggest removing this from the 2020 LBS and providing it as a separate document to avoid confusion and reduce 2020 document size
	General	Team titles	There is no 'Conservation and Environment Team'. Please check terminology to accurately reflect staffing titles as required

Thank you for the opportunity to comment on the Draft Biodiversity Strategy. I look forward to continuing to work with the Kalamunda community to protect and enhance the biodiversity of our amazing City.

Sincerely

Mick

Mick Davis (B.Sc.)

Chairperson, WA Landcare Network

Committee Member, Kalamunda Environmental Advisory Committee

Secretary, Nature Reserves Preservation Group

Committee Member, Friends of Upper Lesmurdie Falls Inc.

Resident, [REDACTED]

Submissions 5 & 6

Submission 5: [REDACTED]

To protect local biodiversity in the City of Kalamunda the draft Local Biodiversity Strategy should be referred to. It shows conclusively that the only significant opportunity that the City of Kalamunda has left to protect the remaining biodiversity is to take decisive action to prevent the rezoning of rural land within the City, including in Wattle Grove South.

It is primarily rezoning of land that is responsible for the vast reduction in biodiversity in the City of Kalamunda, making it one of the worst for tree loss in all of Australia. These trees, understorey and native fauna can not simply be transplanted elsewhere - once they are gone then they are gone forever.

The Councillors should therefore act in the best interests of the community to do just that - take decisive action to prevent the rezoning of rural land within the City.

Kind regards,

[REDACTED]

[REDACTED]

Forrestfield 6058
City of Kalamunda

Submission 6: [REDACTED]

Dear Mayor Margaret Thomas

The protection of our natural environment is of the utmost importance. Especially now as it is at a critical turning point with the effects of climate change affecting us all. To think that Australia has lots of land with green vegetation and we don't have to worry is wrong.

The fires last year in the Eastern States and now the floods being amongst the worst in over 100 years goes to show us that we have a lot of work to do to rectify the damage we have done to the environment and our communities. Suzanne Milthorpe, manager of Wilderness Society Australian National Environment Laws Campaign told ABC Radio in August that since 1999, an area of habitat for threatened species equivalent in size to Tasmania has been cleared across Australia and during the same time the number of threatened species has increased more than 30%.

For our Shire to be the second worst shire in Australia for loss of tree canopy is an outright disgrace. Especially when the Shire promotes environmental values for the people who live here, who obviously treasure nature and all the amazing benefits it provides.

Worldwide many countries are planting trees. In today's West a reader submitted an article that Saudi Arabia is to plant 10 billion trees in its efforts to combat climate change. The UK is planting 30 million trees by 2030 with 750,000 being planted within the next two years. China has deployed 60 thousand soldiers just to plant trees. Africa has plans to plant a 5,000 mile wall to fight climate change and President Biden is keeping over 600 million acres of land fallow so nature can recover.

The draft Local Biodiversity Strategy shows conclusively that the only significant opportunity that the City of Kalamunda has left to protect the remaining biodiversity in the City is to take decisive action to prevent the rezoning of rural land within the City, including Wattle Grove South. Councillors should therefore act in the best interests of the community and the environment to do just that.

Kind regards

[REDACTED]

Submissions 7 & 8

Submission 7: [REDACTED]

I find it hard to comprehend that here we are in 2021, 12 years down the track from the adoption of the 2008 Kalamunda Local Biodiversity Strategy and the Shire has managed to clear 529ha of native vegetation, even with the implementation of -

The establishment of a team dedicated to the management of natural areas in City vested lands and to supporting community volunteers

The growing number of community volunteers engaged in natural area management

Implementing restoration projects in several reserves

Publication of various resources and fact sheets on best practice bushland management.

Mapping and assessing the condition of all city's natural areas.

With this in mind the City of Kalamunda has managed to be the 2nd worst Shire in Australia for destruction of tree canopy. (the greatest cause of climate change).

Having managed to achieve this title in the last 12 years, there has been five key objectives identified to turn this around over the next 10 years.

To increase the protection status of priority natural areas in the City, including on local government managed or owned lands, and on private land

To appropriately manage local natural areas to reduce threats, considering the identified local biodiversity conservation priorities.

To increase the viability and resilience of natural areas by establishing buffers and ecological linkages; considering the impacts of climate change.

To integrate biodiversity considerations across all areas of City's business and operations.

To achieve long term community engagement in biodiversity management.

However, the draft Local Biodiversity Strategy shows conclusively that the only significant opportunity that the City of Kalamunda has to protect the remaining biodiversity in the City is to take the decisive action to prevent the rezoning of rural land within the City, including in Wattle Grove South. Councillors should therefore act in the best interests of the community and the environment to do just that.

Kind regards

[REDACTED]

[REDACTED] Wattle Grove

Submission 8: [REDACTED]

The draft Local Biodiversity Strategy shows conclusively that the only significant opportunity that the City of Kalamunda has left to protect the remaining biodiversity in the City is to take decisive action to prevent the rezoning of rural land within the City, including in Wattle Grove South. Councillors should therefore act in the best interests of the community to do just that.

Kind regards

[REDACTED]

[REDACTED] Wattle Grove

Submission 9

Submission 10 | Nature Reserves Preservation Group

Submission 9:

Wattle Grove 6107

29.03.2021

Please find below our comments re the draft Local Biodiversity Strategy.

"The draft Local Biodiversity Strategy really shows that the only significant opportunity the City of Kalamunda has left to protect the remaining biodiversity in the City, is to take decisive action to prevent the rezoning of rural land within the City. This includes of course our area of residence, Wattle Grove South. As stated so often in previous correspondence, this area abounds in native flora, fauna and birdlife, thanks to the surrounding tree canopy and availability of food and water. It is incumbent of Councillors to act in the best interests of the community and act immediately to prevent such rezoning of rural land within the City.

To requote as per previous correspondence:

'Let us be the change so badly needed. Let us make a difference.'

Yours Sincerely

Submission 10: Nature Reserves Preservation Group

The attached submission is on behalf of Nature Reserves Preservation Group (NRPG) Inc. For information, I have listed below errata from the draft. They are probably incomplete, as there were several sections I did little more than scan rapidly.

Errata.

(p.60). "vie" **substitute** "via".

P. 63 **amend** "less then 5" to "less" than 5"

p. 65 bottom of page. "including the an update" – **delete** "the".

P. 68. **Unfinishedsentence** – "engaging the community in valuing ...?"

P. 62 point 7 **replace** "site" with "sites".

p. 67 last dot point, **closeparentheses**.

Action Plan 5.4 KPI – **replace** "Shire" with "City".

Appendix C Table C 2 **Delete** the second "to".

Appendix E (bottom p. 9) **Replace** "list" with "lists".

Ditto (p. 10) **Replace** "identify" with "identifies".

Regards,

Tony Fowler.

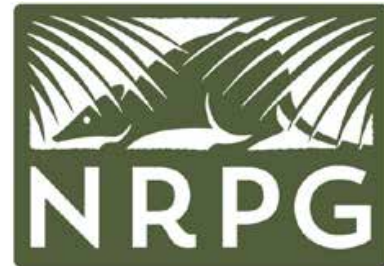
NATURE RESERVES PRESERVATION GROUP

KALAMUNDA WA 6926

www.nrpg.org.au

President : Steve Gates Mob.

Date. 29 March 2021

**Subject: Draft Local Biodiversity Strategy**

This submission is on behalf of Nature Reserves Preservation Group (NRPG) Inc. NRPG welcomes the opportunity to comment on this draft, which we hope will build on the Shire's ground-breaking District Conservation Strategy (DCS), the first such Local Government strategy in Western Australia. This initiative was followed by the first Local Biodiversity Strategy (2008). At the time of the 2008 strategy, NRPG commended the Shire for its initiative and hard work on developing the document, encouraged to see that both these strategies acknowledged and reflected the community's concern for the natural environment. Community involvement is a critical and essential component of any successful local government strategy and it is encouraging to see this acknowledged in the current draft.

INTRODUCTION

"When publishing its 2008 Local Biodiversity Strategy the City was the first local government in Australia to adopt a strategy developed in accordance with the State Government endorsed methodology for biodiversity conservation planning at local level (Environmental Protection Authority 2008)."

The above extract demonstrates the Shire's pro-active environmental stance in 2008, continuing its 1996 environmental initiative. The City staff must be commended for the vast amount of work carried out to date in the preparation of the current draft Strategy.

Given the length and complexity of this draft and to make for easy reading, sections of most interest to NRPG requiring comment, will be italicised and where required for clarity, page numbers given, followed by 'boxed' NRPG comments on the text (as above).

"Review of the City's 2008 Local Biodiversity Strategy found the Strategy was not used effectively to support land use planning decisions or to increase the protection status of identified significant natural areas in the City".

Given this stated failure in the use of the 2008 Strategy, it will be incumbent on the City staff and Councillors to ensure that the hard work expended on this draft, is not squandered through lack of application or a failure to implement fully the Section 6 Action Plan.

"Due to changes in legislation and policy frameworks relating to biodiversity as well as in the biodiversity status in the City, an update of the 2008 Local Biodiversity Strategy is warranted. The key changes include..."

The need for this update is clearly set out. At local government, State and Federal level, changes have rendered some earlier local government initiatives obsolete. Of particular concern are the State Government 'infill' requirements and the acknowledged failings of the Federal Government's Environmental Protection and Biodiversity Conservation (EPBC) Act, in its inability to protect the environment or to conserve biodiversity.

"An update of the City's 2008 Local Biodiversity Strategy was also identified as a priority action in the City's Environmental Land Use Planning Strategy, adopted in July 2019".

Whilst this priority action was welcome (being given a "high" priority), it should be noted this rating appears to be solely in relation to Section 4.7.5 Bushfire and Biodiversity.

1.1 BENEFITS OF CONSERVING BIODIVERSITY LOCALLY

"The local community values the natural environment highly".

The remarkably high percentage of the community considering the trees and vegetation of the City important and supporting protection and enhancing of the natural environment, is both striking and encouraging. This gives a clear mandate to staff and councillors to do all in their power to protect those values (see later comments on Voluntary Environmental Levy).

"Management of natural resources provide for a range of local job opportunities, including employment of Aboriginal people whether in knowledge sharing or direct on-ground management."

The land management skills of the indigenous peoples, are being increasingly recognised by local government and State authorities, such as DBCA and DFES. It is encouraging to see that such employment appears to be more than simple 'window dressing'. In the case of the authorities mentioned, such staff are given important roles (rather than mere sinecures). The City has already received a 'traditional burning' presentation from DFES indigenous officers and, it is hoped the City will take full advantage of the traditional knowledge of such staff, directly and indirectly.

"There is also growing evidence of higher restorative benefits to human health and wellbeing when easy access is available to diverse green spaces as opposed to the simplified environments maintained in landscaped parks with a limited number of plant species..."

This differentiation of the benefits generated by natural as opposed to 'constructed' or 'landscaped' green spaces, is important. Care should be taken not to place too much stress on the value of our carefully managed green spaces, at the expense of areas of perhaps less visually attractive bushland. NRP's 2018 submission on the draft Public Open Space Strategy (POS), was highly critical of the Assessment matrix used (a totally unsuitable construct of the Department of Sport and Recreation). The above quote gives hope that the assessment shortcomings of the POS will not be repeated.

1.2 LEGISLATION AND POLICY SUPPORTING BIODIVERSITY CONSERVATION

Given the wealth of legislation directed at biodiversity conservation, an inability to arrest biodiversity decline indicates a failure to use this legislation effectively. Whilst International, National and State legislation may provide an overarching framework, it is the application within that framework, at the local level, that is perhaps most relevant. We are still seeing unacceptable biodiversity loss within the City limits. It is encouraging to hope that all these Strategies, Conventions and Protocols will play a part in framing the City's own Strategy.

"The State's Planning and Development Act 2005, Schedule 7... establishes biodiversity as a valid planning consideration, incorporating provisions for its preservation and conservation..." "Thus, a local planning strategy and the local planning scheme provide the most effective mechanisms for integrating biodiversity conservation objectives into local decisions (WAPC 2011)."

Both these extracts support an earlier NRP's request for such "integration" to take the form of ensuring all "local decisions" include consideration of biodiversity values (May 2018 draft Local Environment Strategy submission). To ensure the environment receives a fair hearing in "local decisions", the City of Kalamunda should apply an 'Environment in all Policies' (EiAP) approach. Again, we request this be explored by staff, Council and KEAC. Implemented at the Local Government level, it would be a ground-breaking initiative, potentially capable of coping, in an environmentally sensitive way, with the requirements of State Planning Policy (SPP) 3.7, future development projects and the State infill quotas.

The Case for "Environment in all Policies": Lessons from the "Health in all Policies" Approach in Public health. Brown, G.R. and Rutherford, I.D. (2008).

"The City's Local Planning Scheme includes the following support for biodiversity conservation:" (p.10).

Despite the list of "support", "objectives" and "requirements" designed to ensure biodiversity conservation, all are lacking in detail and vague in nature e.g. "make provisions for the conservation..." "assist in the protection of...". This loose terminology may have contributed to the continuing loss of valuable environmental assets under the scheme.

"Opportunities for increasing provisions for biodiversity consideration and protection via the City's land use planning tools include:" (p.11).

These four options may go some way to correcting the apparent limitations of the local planning scheme and should be thoroughly explored and if found effective, employed swiftly.

1.3 LOCAL BIODIVERSITY STRATEGY SCOPE

"The Strategy seeks to identify least cost opportunities for improving the protection status and condition of local natural areas and facilitate engagement with relevant stakeholders."

The unfortunate phrase *"least cost opportunities"* generates great concern and anger. Whilst it is accepted that the City should not waste ratepayers money and should exercise restraint in expenditure, confining these opportunities to the cheapest option is not acceptable. Every "opportunity" to protect and improve the environment should be explored. If found effective, that opportunity should be implemented. This phrase should be deleted from the draft.

*"For the purposes of the City's 2020 Local Biodiversity Strategy, **Local Natural Areas** are defined as natural areas that exist:"*

Addressed later are our concerns for the complete lack of protection for land designated Parks and Recreation (P&R). (For correction, the later Glossary definition, in dot point 1, lacks "except for lands identified by the City as 'City's LNA's'")

2 BIODIVERSITY ASSETS

"...native vegetation on the Swan Coastal Plain portion of the City being reduced to the critical threshold of 10% of its preclearing status..." (p.15).

It is this bioregion of the City which is in need of the greatest protection and which, in general, should be allotted the highest priority. Development pressures within the city, together with those exerted by external developments (such as those at Perth airport and adjacent industrial areas), increase the urgency for action in this area. With the changing climate, there will be an increase in environmental threats. This section of the Strategy should be sufficient to convince council they must do all in their power to protect such unique biodiversity. The threat to these unique assets is increasing, the window of opportunity to manage them is shrinking and prompt action is needed.

2.1 VEGETATION, THREATENED AND PRIORITY ECOLOGICAL COMMUNITIES

"There are significant differences in vegetation distribution across the City ... Less than 10% of the pre-European extent of vegetation remains on the Swan Coastal Plain portion of the City while vegetation of the Jarrah Forest bioregion is well retained." (p. 16)

"Most vegetation complexes in the City are well represented on lands providing protection but there are five vegetation complexes not protected locally and four of these are also not adequately protected across the bioregions ... Increasing the protection status of these vegetation complexes where within the scope of the City's influence is one of the Local Biodiversity Strategy's objectives." (ibid.).

Increased protection measures must acknowledge and anticipate the rapidly increasing pressures on the biodiversity of these complexes. It is encouraging to see this objective in the draft. See also comments above.

Threatened Ecological Communities

"...plant communities in Jarrah Forest are under threat from the impacts of dieback ... and high risk of altered fire regimes." (p. 18)

There is a need for dieback protocols to be strictly observed. Whilst controls on its spread by walkers and mountain bikers appear to be operating well, the City's emergency services may benefit from updating their dieback biosecurity protocols. This may decrease the likelihood of vehicles spreading the pathogen when on exercises or fire calls in bushland areas. 'Updating' may involve 'refresher' talks to brigades prior to the fire season. The increasing intensity of planned and unplanned fires requires closer attention be paid to protecting known areas of peat, with their unique biodiversity, within the Jarrah Forest. A Denbarker prescribed burn (Nov. 2019) totally destroyed an ecologically significant peat system.

"Seven threatened ecological communities mapped in the City are listed under the BC Act and six of these are also listed under the Commonwealth's Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)..." (p.18).

"The principles are in similar terms to those provided in the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (the EPBC Act)..." [Extract from Biodiversity Conservation Act 2019].

Both the WA Biodiversity Conservation Act and the Commonwealth EPBC Act (currently under review) have required amendments designed to address shortcomings in biodiversity protection. The inclusion of the principles of "ecologically sustainable development" in the BC Act is a welcome step yet, using the EPBC Act as a model does little for biodiversity conservation. The EPBC Act has been found wanting and in urgent need of revision, if it is to become effective. Despite the presence of both acts, biodiversity values continue to be lost.

"Priority ecological communities are ecological communities for which there is not enough information available to list them as threatened. There are two priority ecological communities listed in the City of Kalamunda, classified as:

- *P3 – Poorly known ecological communities*
- *P4 – Ecological communities that are adequately known, rare but not threatened or meet criteria for Near Threatened, or that have been recently removed from the threatened list. These communities require regular monitoring."* (p. 19).

This monitoring should be given high priority. Staff must be provided with adequate funding and resources for the task. Tables 6 and 7 (pp. 21-23) contain a large number of "new" species, listed since the 2008 LBS. This fact, together with application of the underlying "precautionary principle" should ensure the City devotes time and money to keeping up with rapid improvements in species detection and listing.

TABLE 5: THREATENED AND PRIORITY ECOLOGICAL COMMUNITIES MAPPED IN THE CITY OF KALAMUNDA (DBCA 2020)

Note the discrepancies between the Commonwealth and State conservation status allotted to the communities. See also earlier comments on shortcomings of the relevant acts.

2.2 CONSERVATION SIGNIFICANCE PLANTS - THREATENED AND PRIORITY FLORA

"Nearly a quarter (48 reserves) of the natural area reserves managed by the City of Kalamunda retain threatened and priority plants." (p. 20)

"This and other similar studies (Nge, F., 2019) demonstrate that focusing only on species listed as threatened or priority by legislation does not adequately describe the conservation significance of natural areas." (p. 21).

These comments reinforce our earlier comments, stressing the need for assigning a high priority to the monitoring of all ecological communities within the City.

"6 Yule Brook region – bushland areas along Yule Brook, from Lesmurdie Falls to Canning River, including some of the most diverse plant communities on the Swan Coastal Plain such as Greater Brixton Street Wetlands and Hartfield Park." (p.21).

NRPG, in the past, has advocated for the establishment of a Regional Park to include the above area of rich, unique biodiversity. Hans Lamber, Professor of Plant Biology at the University of Western Australia, delivered a talk to the 2020 NRPG AGM. "A jewel in the Crown of a Biodiversity Hotspot", highlighting the species richness of the Yule Brook, Crystal Brook and Brixton Street Wetlands and positing the creation of a Yule Brook Regional Park.

2.3 FUNGI

"There are many more fungi in Australia than plants. It is estimated only about 10% of Australia's fungi have been discovered and named. Yet, fungi play significant roles in bushland ecosystem as they transport, store, release and recycle nutrients."

"DBCA's records (January 2020) show 52 records of fungi in the City, including two Priority 3 species of fungi, one carrying the City's name; Amanita kalamundae or Kalamunda Lepidella."

"Building the knowledge base on local fungi will improve the understanding of ecosystem health and inform future management."

Given the importance of fungi to "bushland ecosystems" and the wealth of fungi yet to be discovered, it is puzzling to find so little space devoted to this topic. This was also a failing in the 2008 LBS, in which no "Action" item in table 18 (p.89), related to fungi. Whilst "building the knowledge base on local fungi" is mentioned, no actions are contemplated. This may be an oversight but, with one species "carrying the City's name" perhaps this shortcoming should be addressed in the final document?

2.4 CONSERVATION SIGNIFICANCE ANIMALS – THREATENED AND PRIORITY FAUNA

"Current records (DBCA, January 2020) list 407 native species and 13 introduced species of fauna in the City. Thirteen require special protection. Five new priority fauna were recorded in the City since 2008." (p. 24).

*"26 species of mammals were known to have lived in the area stretching from Lesmurdie Falls to Brixton **Steer** (sic) Wetlands (Bush Forever Area 387) and lists 10 as considered to be present."* (Bradshaw, D. (2019)). (p. 26).

"Maintaining the patterns of flooding and drying of wetlands is critical to retaining the diversity of frogs, reptiles and other animals that are dependent on water. Alteration of natural flooding patterns results in the loss of species like the Moaning Frog or Gunther's Toadlet as they rely on specific water levels during their life cycle (Bamford, M. 2019)". (Ibid.).

It is vital that monitoring of ecological communities continues to be a high priority. The continuing loss of wetlands within the City has always been of great concern to NRPG. Developments such as that resulting from the 2010 High Wycombe Urban Precinct MRS amendment, have seen the loss of significant wetlands. This development saw the loss of what could have been preserved as an iconic ephemeral wetland, serving as an entrance statement to the Shire. It is now a parking lot for heavy machinery.

2.4 (Sic) WETLANDS AND WATERWAYS.

"Maintenance of healthy waterways and sensitive management of drainage through the landscape is critical to maintaining the diversity of aquatic ecosystems and water dependent terrestrial ecosystems ..." (p. 29).

This assertion is at variance with past treatments of waterways and drainage and, whilst many improvements have been made in their management, more needs to be done to preserve such assets (see earlier comments on the loss of such areas). **This section appears to be mis-numbered and should read 2.5.**

"Increasing the protection status of Conservation Category and Resource Enhancement wetlands in the City of Kalamunda is one of the objectives of this biodiversity strategy." (Ibid.).

With a drying climate, increases in temperature and extreme weather events and increasing pressures from development proposals, the long term species' environmental climate tolerance and adaptive capacity should be examined and factored in to this strategy. It is important this objective becomes more than simply an aspirational 'tick-the-box' target.

"The proposed 'Yule Brook Regional Park' consists of bushland along Yule Brook and Crystal Brook from Lesmurdie Falls to Canning River, including bushland and wetlands of Hartfield Park and Greater Brixton Street wetlands (Lambers, H., 2019)." (p. 30).

See earlier comments on Section 2.2 on this proposal. With the addition of 'Climate Action' to the State environmental portfolio, it is hoped this proposal will gain rapid acceptance from State Government and support from the City of Kalamunda.

"In 2011, a report on 10 year monitoring of water quality at the lower end of the Yule Brook catchment found that of the monitored catchments, Yule Brook contributed the second-highest nitrogen and phosphorus loads to the Canning River ... A more recent report into water quality within the Yule Brook catchment concluded that a 25% reduction in nitrogen is required..." (p. 31).

NRPG has long advocated for wider riparian buffers when developments take place along waterways. Such an increase, when incorporated in a Local Development Plan, would help reduce the nitrogen flow into waterways from new subdivisions and their infrastructure.

3 THREATS TO BIODIVERSITY

All the *"proposed additional responses"* to listed threats are welcome and are supported. NRPG comments concentrate on actions NRPG considers require improvement.

"Threat. Introduced plants (weeds)" (p. 32).

Verges under City control, particularly those bordering natural reserves, should receive highest priority. More on-ground staff are required, together with adequate budget funding. The information provided to private landholders should include a warning of the dangers of buying plants considered weeds in the State, from retail outlets and, the community education programme updated accordingly. The City should be proactive in approaching such outlets requesting, as a civic duty, the withdrawal from sale of such plants. This approach should not be left entirely to residents.

"Threat. Feral animals preying on native animals and reducing habitat (loss of nesting hollows)" (p. 33).

The City of Kalamunda is already involved in these additional responses (working closely with DBCA and EMRC) and is in the process of developing Cat local laws. It continues its other pest control measures with great success in fox control and is to be commended for finally tackling the highly contentious domestic cat problem.

"Threat. Land clearing, modification of watercourses, land fill and over-use of fertilisers" (p.34).

"Participation in the Hills Catchment Management Program or other regional catchment management initiative" (Ibid.).

Addressing these threats requires a regional approach since streams and other waterways ignore local government boundaries. Participation in such regional programmes is essential in countering these threats. See also, earlier comments on wider riparian buffer zones required.

"Threat. Arson and lack of consideration of ecological community needs in timing of bushfire risk mitigation measures" (p. 35).

- » *Use the local natural area prioritisation to inform land use planning, avoiding further subdivisions in high conservation value areas*
- » *Develop an adaptive weed control program to facilitate post-fire management of conservation areas*
- » *Adopt an emergency wildlife care strategy to facilitate effective response to major bushfires*
- » *Set up a fire frequency and extent monitoring database"*

Whilst all the proposed measures are necessary and are supported, it is essential all are implemented.

Any proposals to use a planning tool preventing creation of subdivisions in *"high conservation areas"* should be encouraged.

Any *"weed control programme"* failing to fund and carry out post-fire weed control, will simply encourage vigorous weed growth, providing increased fuel for any subsequent fires.

The recent Wooroloo fires highlighted the need for such a *"wildlife care strategy"*.

The establishment of the *"fire...monitoring database"* would provide staff and brigades with another tool with which to tackle planned mitigation measures and wildfires.

"Threat. Introduced plant diseases" (Ibid.).

"• Adopt dieback hygiene procedures for all City operations e.g. roadworks, infrastructure development and maintenance"

These procedures should extend to the Kalamunda State Emergency Service (SES), Fire and Rescue Service (FRS) and the Volunteer Bushfire Brigade (VBFB). Whilst already in place for those bodies, procedures should be updated, enforced and compliance monitored. See earlier comments on p. 18 die-back topic.

4. LOCAL BIODIVERSITY CONSERVATION VISION AND OBJECTIVES.

"In implementing the Local Biodiversity Strategy, the City of Kalamunda seeks to achieve the following objectives:

- 4.1. To increase the protection **status of priority natural areas in the City**, including on Local Government managed or owned lands, and on private land;*
- 4.2. To appropriately manage local natural areas **to reduce threats**, considering the identified local biodiversity conservation priorities;*
- 4.3. To increase the viability and resilience of natural areas by **establishing buffers and ecological linkages**; considering the impacts of climate change;*
- 4.4. To **integrate** biodiversity considerations across all areas of City's business and operations;*
- 4.5. To achieve long term community engagement in biodiversity management*

These are all worthy objectives, enthusiastically supported by NRP. Past experience however provides a note of caution in that support. Recommendations of the October 1998 Wildlife Corridor Strategy described correctly, in the Executive Summary as: *"an innovative and pro-active initiative which originated from the Shire's District Conservation Strategy produced in 1995"* were not fully implemented, the Strategy languishing in the archives for many years, despite the Strategy stating it should be reviewed. This present Strategy is the latest in a long line of environmental initiatives, all of which have given environmental staff a massive workload. Over many years, this has been appreciated and commended in all NRP submissions. Given the comment at 4.1 (above), this may be a case for employing the **"Environment in all policies"** concept cited in comments on Section 1.2 of the strategy.

5. IMPLEMENTATION.

5.1.1 PRIORITISATION OF LOCAL NATURAL AREAS

"While retention of natural areas should be facilitated where feasible, there are natural areas (high priority LNAs) which should be formally protected via adequate mechanisms to ensure their long-term land tenure security and management to prevent degradation." (p. 38)

NRP is concerned at the lack of any protection for those areas designated 'Parks and Recreation' (P&R), under the Metropolitan Region Scheme. A P&R reserve (Reserve 30314 Wilkins Road Kalamunda), under threat of rezoning from an MRS amendment and later development, saw the City proposing another P&R City reserve as an offset. Given the lack of any protection for this offset reserve, this appeared to be a farcical proposal. The vulnerability of all P&R reserves containing high biodiversity should be addressed.

"It is important to note that this dataset represents a snapshot in time ... Low prioritisation scores cannot be interpreted as those areas not containing significant biodiversity." (p. 42)

"Any final decisions regarding protection or land use change need to be based on field assessments to confirm the indicative biodiversity values. Finally, specialist's advice is required to determine the significance of the known population of threatened plants or animals as the distribution of some threatened species can be very limited." (Ibid.)

The above two extracts (stating the inherent shortcomings of these initial steps), should be noted and the initial assessments treated only as the starting point for the final priority assessment. The prioritisation process will need to pass through several steps before the final priorities are agreed.

5.1.2 ECOLOGICAL LINKAGES AND VEGETATION CONNECTIVITY

"...the effects of urbanisation on long term viability of plant communities is not well- understood." (p. 44).

More research is required into these effects, given that urbanisation inevitably leads to fragmentation of habitat. Given the possibility of long term harm to plant communities, this lack of understanding should be factored into all urbanisation projects, particularly where valuable plant communities may be affected.

"To increase the capacity of natural areas to retain biodiversity in fragmented urban landscapes and adapt to climate change, the recommended management responses include the following (Molloy et al 2009, Commonwealth of Australia 2010, CSIRO 2014)" (p. 44).

"Establishment and maintenance of effective ecological linkages address many of the above recommendations." (Ibid.)

For many years, NRPB submissions have stressed the need to establish and preserve valuable linkages such as wildlife corridors and green links. The value and importance of such areas is increasing. Given the increasing demand for infill development in the foothills and the increasing 'heat-island effect' (compounded by airport industrial and aviation development and large treeless industrial areas), such linkages assume even more importance, giving flora and fauna a better chance of migrating locally in response to the changing climate. The listed "management responses" and their implementation within this Strategy would be welcomed by NRPB.

"Regional ecological linkages for the Perth region were mapped by the Perth Biodiversity Project in 2004. Since then, land use changes affected the feasibility of some regional linkages in parts of Perth." (p.44).

Comparing the linkages map (Fig. 9), with that in the 2008 Local Biodiversity Strategy (Fig. 5, p. 46) there is a comforting similarity. Perhaps (as they were in the 2008 map), the waterways could be included in Fig. 9, Regional and Local Ecological Linkages? It would have been interesting to have had the 2021 image overlaid on the 2008 image for comparison.

"Include areas with high Connectivity Reach values and with least cost opportunities for retention to act as stepping-stones within linkages." (p. 46).

This sentence could see extremely valuable areas discarded, simply on a financial cost basis. Attractive as this approach may be to the financial arm of the City, this is not a sound practice in such a Strategy and should be amended as follows:

"Include areas with high Connectivity Reach values, for retention to act as stepping-stones within linkages". Some areas discarded on a costs basis, may have been vital to the integrity of a linkage.

5.2 TOWARDS LOCAL BIODIVERSITY CONSERVATION OBJECTIVES

"To allow monitoring the effectiveness of the proposed implementation mechanisms and the levels of implementation, adoption of targets specific to each objective of the City's Local Biodiversity Strategy is recommended. Table 11 lists the recommended targets and references sections of this document which discuss how to achieve them." (p. 47).

TABLE 11: LOCAL BIODIVERSITY CONSERVATION TARGETS

The 'Objectives' and, 'Targets to be achieved by 2031' are all supported by NRPB, though we feel some targets, are not ambitious enough. Past experience reveals that such targets are seldom met, therefore they should be designed with this in mind. There is still concern over references to P&R designated land throughout this document, since no effective protective mechanism is in place or contemplated (see earlier comments). Will having a management plan for such a reserve, give any degree of protection?

Objective. *"To establish biodiversity consideration as standard across all areas for biodiversity conservation"*

"4.1. Local Biodiversity Strategy objectives are integrated into the City's land use planning tools"

How? *"Integration into City's Local Planning Strategy, Local Planning Scheme and adoption of Local Planning Policies -See Section 5.2.1"*

"4.2 All staff use the City's environmental checklist procedures prior project planning and development"

Both 4.1 and 4.2 indicate a welcome move towards the earlier **"Environment in all Policies"** request (comment on Section 1.2). As with the ground-breaking nature of both the District Conservation Strategy (1996) and the adoption of the Local Biodiversity Strategy (2008), agreeing to investigate adoption of this initiative within his LBS, would again place the City at the forefront of Local Government environmental reform. To have these "objectives" "integrated into City's Local Planning Strategy" would ensure improved biodiversity conservation within the City.

5.2.1 OPPORTUNITIES TO INCREASE PROTECTION AND RETENTION OF LOCAL NATURAL AREAS

"The City of Kalamunda manages nine Crown reserves with vesting purpose listed as conservation or protection of flora ... and not all are recognised as 'biodiversity assets' in the City's Public Open Space Strategy (2018)."

This reinforces NRPG criticism, in its 2018 submission, of the format of this Strategy.

"It is disappointing to have the Department of Sport and Recreation, together with the Planning Institute of Australia WA, advising local government through the Public Planning and Design Guide WA and State Public Parklands Strategy." A totally unsuitable framework for any environmental document. (Extract from NRPG submission on POS).

"While the increase in lands reserved for Parks and Recreation in the City is significant, the land tenure under the Land Administration Act 1997 for these lands has not changed and thus no significant increase in formal protection of native vegetation in the City was recorded since 2008" (p.52).

"This MRS land use classification alone is not considered adequate at providing formal protection for native vegetation." (Ibid.).

See comments on Table 11 (p.47) regarding this lack of protection. NRPG welcomes the proposed new reserve classifications to be introduced into the City's Local Planning Scheme.

"To recognise conservation value of these City managed reserves, introduction of a new local reserve classification into the City's Local Planning Scheme is proposed." (p. 52)

Any initiative to highlight and protect conservation values is welcome. Unfortunately the phrase "City managed reserves" excludes valuable bushland areas such as Reserve 30314, Lot 59, Wilkins Road Kalamunda, for which the city has no management responsibility, yet which provide vital biodiversity linkages between areas under City management. This deficiency needs to be addressed.

5.2.1.1 BIODIVERSITY CONSERVATION PRIORITIES

TABLE 12: BIODIVERSITY CONSERVATION PRIORITY CATEGORIES, AREA OF NATIVE VEGETATION MAPPED WITHIN EACH CATEGORY AND RECOMMENDED ACTIONS FOR CONSERVATION (pp. 53-57)

All recommended "actions for conservation" in this table are supported by NRPG and all should be implemented, if this Strategy is to provide any measurable improvement in the level of biodiversity protection within the City.

5.2.1.2 INTEGRATING BIODIVERSITY CONSERVATION OBJECTIVES INTO LAND USE PLANNING

"Local Planning Scheme ... It is recommended that the City's Local Planning Scheme be amended to include new local reserve classification e.g. Local Conservation Open Space and strengthen provisions for biodiversity during development approvals on lands identified as containing significant biodiversity." (p. 57/8).

This recommendation should be implemented and, the "Other opportunities" certainly explored in detail. All these actions should serve to give 'teeth' to efforts to preserve biodiversity values.

"Update of the City's Public Open Space Strategy (2018)" (p. 60).

"It is recommended that the City update the Biodiversity Asset POS mapping to integrate the findings of this strategy regarding the significance of POS to biodiversity conservation." (p.61).

See earlier comments on the perceived failings of this Strategy (at 5.2.1) and the following comment, reflecting NRPG concern over the possible threats to reserves:

"Within the City of Kalamunda, Planning and Environment Departments seem to be worlds apart. The Planning section is charged with reviewing its Public Open Space Strategy at designated times. From the list of 21 lots considered for 'transfer', we can only assume there was little, if any input from the City's Environment section and, that the process of "consultation with internal departments" (1.7.1, p.8.), failed. If this is so, future reviews of this strategy need to ensure this failure is not repeated." (NRPG submission).

5.2.2.1 CITY MANAGED LOCAL NATURAL AREAS

"Implementation of several of the Local Environment Strategy actions will be facilitated by this document."

"In addition to the specific actions listed in the City's Local Environment Strategy, the following additional recommendations are made:

- *Develop, adopt and implement a bushland management master plan for all City managed Local Natural Areas;*
- *Secure and protect natural areas within mapped ecological linkages and undertake restoration of degraded areas to strengthen connectivity between protected areas within the regional and local ecological linkages."* (p.61).

Anything which drives implementation of Strategy actions or recommendations is welcome. Both dot-points are long overdue, a "bushland management master plan" will need 'teeth' to be effective and once again, it is hoped council will implement these recommendations.

"However, road reserves are mapped and classified according to roadside conservation committee protocols and can act as corridors and buffers." (p.62).

More attention is needed to the maintenance of City road reserves. Their value as potential "corridors and buffers" should be fully utilised, regardless of how they are defined in planning documents. Many sections of them could be treated as potential Local Natural Areas, provided they were properly maintained. Increased budget allocations will be needed to ensure there are sufficient staff employed on this task. Verge maintenance staff are already stretched to the limit. See also our comments to **Section 3 Threats to Biodiversity**, (p.32).

5.2.2.2 MANAGEMENT OF BIODIVERSITY ON PRIVATE LAND

In any discussions on managing biodiversity, reducing native vegetation clearing on private land is 'the elephant in the room'. Over many years it has been a subject on which council has been reluctant to act, consigning any difficult option to the 'too-hard basket'. Whilst this reluctance is understandable, growing research on the topic indicates that a failure to address the private land clearing problem will cancel out all benefits obtained from vegetation retention and improvement on City-managed land.

"It is recommended that the City..." (pp.65-66).

All these proposals are supported and welcomed by NRPB. Assessing and improving the environmental understanding of private land holders, emphasising the contribution of residential blocks and gardens to biodiversity, as stepping stones in linkages and corridors and, extending the "Plants for Residents" programme, are excellent measures. Continuing the "carrot" approach (implementation of "an incentives programme") should focus on showing that, for the land owner, it will bring rewards in several forms. It is essential they can see they receive a material benefit from not clearing their land.

"In addition to the information resources the City already provides, it is recommended that the following additional information is developed:

- *Responsible cat ownership"* (p.66).

NRPB is delighted to see that this recommendation has already taken effect. The City is preparing a draft policy, designed to address the shocking level of predation by domestic cats within Local Government Areas in the Metropolitan Area.

5.2.3 INTEGRATION OF BIODIVERSITY CONSIDERATION INTO LOCAL GOVERNMENT BUSINESS

See **"Environment in all Policies"** comment on Section 1.2 and throughout submission.

5.2.4 COMMUNITY ENGAGEMENT

"To effectively engage the local community and other land managers in the City, it is important to maintain consistent communication on the City's objectives for biodiversity conservation. This should be facilitated by:" (p. 67).

All these dot point actions should be implemented, with emphasis on those below. With the developing rail link to the foothills, the second proposal assumes even more significance in helping revive the City's tourism businesses.

"Referring to the findings of the Local Biodiversity Strategy when providing comments on subdivision and scheme amendment proposals."

"Engaging with local business groups and tourism operators to maximise the City's position as a destination for tourism (Bibbulmun Track, wildflowers, wellbeing stays and unique arts stays)."

"Continued support to the volunteer community groups" (p. 68).

The City has spent much time, money and energy to help establish and support these groups. NRPG acknowledges this effort and welcomes this continued support and seeing it given *"the highest priority."* Unfortunately, more stringent safety requirements are being placed on such volunteers. These may have the effect of discouraging community members from remaining in such groups. NRPG would welcome the City investigating less onerous safety and training requirements, whilst still feeling confident it had fulfilled its 'duty of care'

6. ACTION PLAN

The accompanying tables (pp. 69-73) contain text already addressed in the relevant sections of this submission. Selected text has been extracted for comment. Whilst it is encouraging to see no actions have been allotted *"low"* priority, the *"complete by 2031"* definition may explain this. If 10 years may elapse before an action must be completed, perhaps that category should be deleted? Given the rapidly changing climate and increasing public awareness of and concern for biodiversity, it is essential the allotted priorities are regularly reviewed.

Action. *"5.4 Develop a monitoring and reporting schedule"*

KPI. *"Bi-annual report on progress with implementation of the Local Biodiversity Strategy and on the status of biodiversity in the Shire presented to the Council and the community".*

This monitoring and reporting is essential if this Strategy is to serve any purpose. Given the rate of staff turnover in some sections and the changes in councillors over time, there is an established potential for long-term memory loss. This can result in a strategy and its recommendations being forgotten and therefore effectively ignored, to the detriment of the biodiversity. Regular reporting avoids this possibility.

APPENDIX A: VEGETATION STATISTICS

"6. Further discussion was undertaken with City Officers and consideration of current planning processes, future plans, revegetation programs, potential future offset sites etc was taken into consideration in the final delineation of LNAs". (p. 2).

The phrase *"offset sites"* always triggers a warning with NRPG. This basically flawed system together with its guidelines always results in a net loss of biodiversity. It is hoped that, in future, no P&R designated land will be offered as an offset for the destruction of vegetation and loss of biodiversity (through, for example, an MRS amendment) on another block of land managed by the City.

APPENDIX C: MAPS

TABLE C-2: PROPOSED CONSERVATION RESERVES etc. ...

Reserve 29013, adjoining R30142 and Mundy Regional Park, is **not** on this list. At the request of NRPG (because of its biodiversity values and its unspoiled condition), the Shire of Kalamunda took vesting of Reserve 29013 on 27 November 1992. The **2008** Local Biodiversity Strategy includes this reserve in *"The reserves in good or better condition that should be protected further by altering the reserve purpose"*. (Section 13.2.4 Darling Scarp Representation Target. p. 105). If this reserve has failed to receive "further" protection, other similar valuable reserves may have been missed. If so, this should not be surprising, given the immense amount of work required by City staff and consultants. See later comment on Appendix F, where both reserves are listed.

APPENDIX E: 2008 KALAMUNDA LOCAL BIODIVERSITY STRATEGY REVIEW REPORT

"This report summarises the findings of a review into the effectiveness of the 2008 LBS in increasing the protection of biodiversity in the City of Kalamunda. The key findings include:"

The report is very important in highlighting the failure of the Shire/City to act on the 2008 Local Biodiversity Strategy recommendations and, the continuing loss of biodiversity values since 2008. It also outlines actions carried out which have benefitted the environment. **Failures include:**

the increased rate of clearing of native vegetation, only a *"slight increase in formal protection"*, minimal use of vesting purpose changes, a failure to increase protection of biodiversity or vegetation complexes and, a failure *"to adopt any Local Planning Policies focusing on biodiversity protection"* or to implement *"local planning scheme provisions amendments"*.

Despite these failures, **positive measures taken include:**

Developing a *"strategic approach to management of reserves vested in the City"*, increasing the number of Friends Groups working closely with the City *"managing and restoring the significant natural areas across the City"*, implementing many restoration projects, the continuation of the *'Plants for Residents'* programme, a *"dedicated Environmental Services Unit"* and, a bushland information package for private landholders.

Ecological Linkages (p.10).

"The City's ELUPS (2019) identify (sic) preparation of a 'Green Links Masterplan' and a

'Street Tree Masterplan' as the priority action (Action 8.1.1). However, the 'Street Tree and Streetscape Management' policy, adopted in August 2019 does not refer to ecological linkages and it focuses on public landscape management to maintain the City's identity, contributing to improved resident's health and wellbeing." (p. 10).

Despite the importance of considering "residents health and wellbeing" the ELUP Strategy should be amended to refer to the importance of ecological linkages.

2.2 REPRESENTATIONAL TARGETS

*"Since the adoption of the 2008 LBS, vegetation representative of the Forrestfield vegetation complex **declined** (locally and regionally)." (p. 15).*

*"• Local protection target of at least 15 ha of Forrestfield vegetation complex protected **has not been achieved yet;**" (p. 16).*

*"• Since the adoption of the 2008 LBS, vegetation representative of the Southern River vegetation complex **declined (locally and regionally)**.*

*• Local protection target of at least 7 ha **has not been achieved yet.***

*• At the bio-regional scale, Darling Scarp remains **under- represented** in lands with conservation purpose (less than 10%) and its **extent reduced** across the City.*

*• **No increase in formal protection achieved** as a result of LBS implementation." (p. 17).*

*"• Since the adoption of the 2008 LBS, vegetation representative of the Yarragil 1 vegetation complex **declined locally.***

*• **No increase in formal protection** of Yarragil 1 has been achieved as a result of LBS implementation. (p. 18).*

All vegetation complexes have declined since the 2008 LBS. The "Summary" section for each complex (noted above), is a sad commentary on the failure of past strategies to arrest the loss of biodiversity in these complexes. This points not to a failure of the strategy but to the failure of the City to make full use of the findings of such a strategy.

3 BIODIVERSITY CONSERVATION ACTIONS FOR CONSERVATION

The two columns in this section give a clear picture of the City's failure to take advantage of the 2008 strategy. Comparisons selected from "Actions" and "completion status" columns demonstrate these failings. Unless there is a significant change of heart within council, this current Strategy can expect to receive similar dismissive treatment.

Action. "Improve the protection and management of local reserves by changing vesting purpose..."

Status. "Change of vesting purpose of reserves listed in the 2008 LBS was not implemented."

Action. "Forming a reserves management committee,"

Status. "No reserves management committee has been established." Even after twelve years!

Action. "Developing a Reserves Masterplan"

Status. "The City is in the process of developing a process for prioritising reserve management." Twelve years is too long an interval for this action to be completed.

Action. "Protecting natural areas in public open space contributions ... full ecological assessments should be conducted prior to structure planning"

Status. "There is no systematic process set up to monitor whether vegetation is protected in all new areas being subdivided or developed. (p.19).

Action. "Developing Private Land Conservation Strategy including: Undertaking a survey of residents to determine initiatives that will be successful • Also include public opinion with regards to **Environmental Levy** in survey."

Status. "While the City did not conduct a survey of residents to determine which private landholder incentive initiatives were likely to be taken up, the City published a comprehensive Private Landholder Bushland Information Package in 2013." (p. 20).

Such a survey should now be carried out. The information package, whilst of some use, is no substitute for surveying residents' views on a voluntary environmental levy. **"The local community values the natural environment highly, with 97% of respondents in the City's 2017 and 2019 community surveys saying that the City's bushland, trees and natural vegetation are important and 96% wanting to see the integrity of the local natural environment protected and enhanced (City of Kalamunda, 2019)."** (Section 1.1 p. 6).

This clearly indicates that such a levy may well be acceptable to residents. For many years, NRPG has requested a voluntary levy be explored citing as an example, the overwhelming support for a **mandatory** environmental levy in Ku-ring-gai (NSW). This levy has been in place since 2005 and is levied at 5% of Council's total rate revenue. Every year, it funds around \$3million worth of environmental programmes. A 2011 survey showed 88% of those surveyed supported continuing the levy. In 2019 the term of the levy expired. Ku-ring-gai Council has now succeeded in making this a permanent levy. If the City of Kalamunda fails to explore this levy option, it is failing its residents and depriving its coffers. It is time this attitude changed. Previous Council refusals to explore this option, presented specious arguments to support that refusal, none of which were convincing.

Action. "Development of the Shire's Environmental Services including: • Environmental Reserves Officer • Environmental Planner"

Status. "Briefly, a role of Environmental Planner was created but not continued."

The current Environmental Services do an excellent job. The unfortunately short-term introduction of an Environmental Planner was a welcome addition, ensuring, during planning and development initiatives, relevant environmental matters were conveyed to other departments, thereby relieving their staff of having to plough through reams of environmental documents.

Action. "Update weed strategy"

Status. "The City's Weed Control Strategy (2002) is yet to be updated."

Action. "Review of Wildlife Corridors Strategy"

Status. "Review of the Wildlife Corridors will be part of the Local Biodiversity Strategy update." (p. 21).

These updates and reviews are long overdue. The Wildlife Corridor Strategy for example, dates back to October 1998.

Action. "Review and update the LBS to ensure it remains up to date and any new mechanisms can be implemented."

Status. "No systematic reviews have been undertaken since the adoption of the Local Biodiversity Strategy in 2008."

This review failure is a damning indictment of this particular aspect of the City's environmental performance over the past twelve years. Constant review of all strategies is essential if they are to be effective. Whilst a huge amount of good work has been carried out by the environmental section, much of that work will be wasted, unless Council itself remains up to date through "systematic reviews" of strategies.

APPENDIX F: CITY OF KALAMUNDA RESERVES PRIORITISATION

Table. (p. 25)

Local Natural Area 00003 consists of R. 30142 and R. 29013. The latter has frontage on Marie Way. Perhaps the reserve name "Yorna/Alpine Road" could be altered to "Yorna Road/Marie Way" or, since it runs along Bird Road (with no residential lots on its boundary as in the case of Yorna Road), Bird Road/Marie Way? The 2008 Local Biodiversity Strategy includes "R 29013 12 Marie Way (Crumpet Creek)" on a list of "reserves in good or better condition that should be protected further by altering the reserve purpose..." (13.2.4 Darling Scarp Representation Target).

Conclusion.

Appendix E is a most damning section of this Strategy. The environmental staff and those engaged from the community who prepared and commented on the 2008 Strategy, would be saddened to see how much of their work had been wasted through a lack of Council commitment. On reading through this Appendix, Council should be feeling ashamed of their performance over the interim. We see that performance as a squandering of numerous opportunities to protect and enhance the natural environmental values of the City. Through past neglect and despite the best efforts of a hard working environmental section, Kalamunda City is now on track (despite its "clean and green" aspirations) to developing a deplorable environmental reputation.

The following extract is an introduction to a theme running throughout this draft – the lack of Council commitment in matters of environmental protection, for over more than a decade.

"Review of the City's 2008 Local Biodiversity Strategy found the Strategy was not used effectively to support land use planning decisions or to increase the protection status of identified significant natural areas in the City." (Introduction. p.5).

Even at this early stage of the draft, the introduction contains damning statistics, asserting virtually no increase in **effectively** protected areas and a significant (> 650 hectares) loss of native vegetation.

The City was commended for surveying its community prior to the drafting of this Strategy. Results showed overwhelmingly a love of and support for the City's environmental values and a wish to see them preserved. This support surely gives Council a mandate to do all in its power to ensure the wishes of its residents are honoured, particularly in this time of Climate Change crisis and species extinctions. The community has spoken. Now is the time for Council to listen and act.

The environmental biodiversity values of the City of Kalamunda have been identified, the need for their protection and enhancement well established and the remedies for this protection outlined. In the past, strategies have been produced, ticking all the right boxes, only to have few of the many recommendations adopted. The significant effort invested in this current draft strategy should not be wasted.

This is a great opportunity to show that the City of Kalamunda staff and Council are doing something positive to preserve the ever-declining biodiversity values within the City. It is an opportunity not to be squandered. With some shortcomings, if fully implemented this strategy, will be seen as truly reflecting the community's love for the natural environment and will go some way towards arresting the rapid decline of biodiversity in the city.

Anthony Fowler p.p. Steve Gates, President NRP.

[End]

Submissions 11, 12 & 13

Submission 11: [REDACTED]

Dear Sir/Madam

The draft Local Biodiversity Strategy makes me concerned that the desires of the majority of residents affected could be ignored should council not prevent the rezoning of any more Rural zoned land in the City. As a resident of Wattle Grove South I understand there is an attempt being made to rezone this area without due consideration of the majority of residents. I would **ask All Councilors to act in our interests.**

Sincerely yours.

[REDACTED]
[REDACTED]

Wattle Grove 6107

[REDACTED]

Submission 12: [REDACTED]

The draft Local Biodiversity Strategy shows conclusively that the only significant opportunity that the City of Kalamunda has left to protect the remaining biodiversity in the City is to take decisive action to prevent the rezoning of rural land within the City, including in Wattle Grove South. Councillors should therefore act in the best interests of the community to do just that.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]

Wattle Grove

Submission 13: [REDACTED]

Please forward to appropriate department.

In my opinion the draft Local Biodiversity Strategy shows conclusively that the City of Kalamunda says 'the right thing' in regard to the environment but is reluctant to actually take appropriate action to stem the wholesale destruction of the tree canopy and environmental biodiversity within the City's jurisdiction.

A significant opportunity exists for the City of Kalamunda to protect the remaining biodiversity in the City. Act positively before it is too late. Prevent the rezoning of rural land within the City especially in Wattle Grove South.

The City has an abysmal history of tree canopy destruction and council and every councillor should hang their heads in shame at being recorded as one of the worst areas of environmental destruction in the whole of Australia.

What a shocking legacy the City of Kalamunda leaves for future generations. A 'Home in the Forest' when continually rural pockets are permitted by the City to be destroyed by developers.

Councillors should act in the best interests of the community and protect what remaining natural vegetation and biodiversity there is in the smaller rural pockets within its jurisdiction.

Kind regards

[REDACTED]
[REDACTED]

Orange Grove 6109

[REDACTED]

Submission 14

Submission 14: [REDACTED]

I have read the Plan and completed the survey. Thank you for providing a photocopy which is much easier to read and refer to.

I have lived in Maida Vale for over fifty years, thirteen of them on the plain and the rest on the scarp. Therefore I have seen huge changes in the environment. On reading the Draft Plan I felt rather sad and thought that while the it would be amazing if it was all implemented with dedication, perhaps it is all too late.

I remember the attractive flora which grew on the road from Maida Vale to High Wycombe, not much sign of it now.

My present property is bordered by Poison Gully. When first here we often had Rainbow Bee-eaters and Sacred Kingfishers flying round the garden. I haven't heard a Pallid Cuckoo for many years. Legless lizards and frogs were abundant. However we now have lots of Quendas plus Bronzewing Pigeons and Superb Fairy-wrens.

The diverse local flora grew along the banks of the creek but was lost to garden development.

Volunteer Groups

For twenty years I was convenor of the Friends of Norwood and Millson Reserves. Norwood Reserve represents the Forrestfield Vegetation Complex and contains the the threatened *Conospermum undulatum* and the northernmost record of Priority 1 *Thelymitra magnifica*.

In 2001, 2002 and 2004 there were fires (of unknown origin) in parts of the reserve). As I was documenting the flora at the time I saw a rich herbaceous flora regenerate. Most of those species are not seen now because the reserve needs to be burnt about every seven years but in spite of requests for this to be done it was not. The public notice when the area looks a mess with many dead *Hakea trifurcata*.

We were always very appreciative of the help received from the Council Environmental staff though we suffered from the lack of continuity when staff changed and projects apparently disappeared from the records.

Every year we had the great event of planting. I do not think we received the same encouragement to encourage regeneration. (See Box 1 page 13 of plan).

Alas our tiny group has had to disband because of age and health problems. All those passers by who congratulated us on our efforts were far too busy to help.

Community Involvement

I have spoken to neighbours also living by Poison Gully. Obviously they like the area, may encourage the bird life and enjoy seeing Quendas around. However few know the difference between Marri and Jarrah or any other "gum tree".

One neighbour regularly clears rubbish accumulating in the creek but was very distressed recently when the banks were sprayed for weeds (sprayed area not identifiable by dye) and her planted Grevilleas were killed. No one knew beforehand that the creek was being resurveyed and new boundary poles positioned or that spraying was planned. Rumours abounded.

This is why I think that the involvement and education of residents in environmentally sensitive areas is vitally important.

The detail and targets in the Draft Plan are excellent though I trust there will be some good editing before the final draft. I sincerely hope that it will not be watered down and will be incorporated into every aspect of planning.

With hope and best wishes,

[REDACTED]

Submissions 15 & 16

Submission 15: [REDACTED]

To the City of Kalamunda.

The draft Local Biodiversity Strategy shows conclusively that the only significant opportunity that the City of Kalamunda has left to protect the remaining biodiversity in the City is to take decisive action to prevent the rezoning of rural land within the City, including in Wattle Grove South.

Councillors should therefore act in the best interests of the community to do just that.

The ratio of destruction of Flora and Fauna in this and under this Councils regulation to what has been preserved is something you should be ashamed of

Respectfully,

[REDACTED]

Lesmurdie.

Submission 16: [REDACTED]

Good afternoon

The draft Local Biodiversity Strategy shows conclusively that the only significant opportunity that the City of Kalamunda has left to protect the remaining biodiversity in the City is to take decisive action to prevent the rezoning of rural land within the City, including in Wattle Grove South. Councillors should therefore act in the best interests of the community to do just that.

Kind regards

[REDACTED]

[REDACTED]

Wattle Grove 6107

[REDACTED]

We acknowledge the traditional owners of country throughout Western Australia and their connection to land, waters and community. We pay our respects to them and their cultures, and to their elders past and present.

Submission 17 | The Wildflower Society of WA

Submission 17: The Wildflower Society of WA (WSWA)

[Note: this submission was received by email a day after the closing date]



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

14 April 2021

City of Kalamunda

Engage.kalamunda.wa.gov.au/lbs-2020-2030

To whom it may concern

KALAMUNDA LOCAL BIODIVERSITY STRATEGY

The Wildflower Society of WA (WSWA) makes this submission on the City of Kalamunda's Draft Local Biodiversity Strategy 2020-2030.

Overall, the WSWA welcomes the biodiversity strategy work being done in Local Government. However, this policy document is highly disappointing in the context of the value of Kalamunda's very high biodiversity values and needs additional work.

Our specific comments are made in the following sections and have been informed through feedback from several of our members and associates who reside in the City of Kalamunda.

Previous history

The then Shire of Kalamunda approved and endorsed the 1995 District Conservation Strategy Policy and the 1998 Wildlife Corridor Strategy Policy with full council support. These Policies were prepared following more than four year's engagement with 100 Shire residents and also the State's top scientists and planners. The Shire prepared updated draft strategies in 1999 and sent letters to ratepayers encouraging good behaviour next to corridors in 2000. These Policies made the City of Kalamunda a leader in environmental policy, local government biodiversity strategy and public engagement, and was well documented inside and outside of council. Consequently, the Shire of Kalamunda won a John Tonkin Greening Award in 1996/7 for this work.

This work was copied by other local governments and used for instance by the Shire of Mundaring in extending the wildlife corridors across the Perth Hills.

This initiative was followed by the first Local Biodiversity Strategy in 2008.

Current Situation

The City of Kalamunda itself acknowledges that the 2008 Local Biodiversity Strategy was not used effectively to support land use planning decisions or to increase the protection status of identified significant natural areas in the City. Given this stated failure in the use of the 2008 Strategy, it will be incumbent on City of Kalamunda staff and Councillors to ensure those shortcomings are not repeated. The City needs to again support its District Conservation Strategy and the Wildlife Corridor Strategy policies.

The City of Kalamunda is very reliant on its Friends Groups volunteers to maintain pockets of existing bushland, but their manual labour and time is limited. The lack of knowledge of sources of information, or of current information, on flora and fauna hinder the efforts of volunteers and City staff who are relying instead on inadequate data. Current activities and outcomes regarding these globally important biodiversity values need to have the tools and support to match earlier achievements.

The Biodiversity Strategy

The WSWA supports the concept of a Biodiversity Strategy and is pleased the City of Kalamunda has started the re-initiated process and reviewed its earlier Strategy. However, the current draft document is not easy to understand. It is not presented in a way that recognises the very good work carried out in support of the 1995 DCS District Conservation Strategy Policy and the 1998 Wildlife Corridor Strategy Policy. The major strategies and recommendations of these Policies also need to be included in the new draft Biodiversity Strategy.

The figures and the GIS are very difficult to use. The simple figures of the Shire of Kalamunda's earlier reserve management reports were much easier to use, although GIS is invaluable for analysis and is an excellent and necessary facility, the simplified presentation will aid volunteers and community members in their work to support the strategy.

This draft biodiversity document also shows that the City of Kalamunda doesn't currently know that the biodiversity is well documented and the potential there is to do great damage to existing healthy flora and fauna populations.

However, there is recognition in the draft Biodiversity Strategy of the increasing evidence of higher restorative benefits to human health and wellbeing of remnant native bushland, even if it is in less than pristine condition. This aspect of native vegetation, as well as the value of the other ecosystem services that native vegetation provides, needs to be more strongly emphasised, celebrated and protected.

Biodiversity Strategy actions required

Former EPA head Dr Barry Carbon simplified the principles of environmental protection into Conservation through Reserves, Management planning, Wise use of resources and the Protection of People. This is also a core model of what is needed in this draft Biodiversity Strategy to protect and maintain our Planet and Biodiversity life support systems.

The biodiversity policies of the State, proposals for new National and Regional Parks, and policies for protection of Bush Forever sites, wetland and waterway conservation and Greenways need to be implemented. If they are not implemented, we all lose and biodiversity loses, and we lose our legacy.

The destruction of WA's Southwest biodiversity hotspot, of Kalamunda's conservation reserves, biodiversity, ecosystem and the impact of this destruction of wildlife corridor vegetation, fauna and beauty is not good for local residents, let alone for other residents of the state.

Therefore, the WSWA supports the establishment of cross-Kalamunda National Parks and Regional Parks, including the placement of stream wildlife corridors into larger state managed A class reserves. This means the full implementation and expansion of the Darling Range Regional Park as declared by the then Premier in the late 1990s. The WSWA strongly recommends that the City of Kalamunda re-start and engage staff to properly implement the Wildlife Corridor GIS Based Conservation Reserve System work and improve the quality of this work.

Bird nesting areas, such as those in Quenda Creek and the Gooseberry Hill regional open space, need to be incorporated into the Gooseberry Hill National Park. The Maida Vale Reserve supports nesting of listed migratory birds, so the Reserve's management needs to be undertaken under the umbrella of an A class conservation reserve vesting.

The WSWA strongly recommends that the Biodiversity Strategy utilises and supports the conservation of the Threatened Ecological Communities and Declared Rare and Priority Flora east of the Swan Canning Estuary, and in particular in Kalamunda, that is underpinned by the Swan Coastal Plain floristic communities work.

The construction of Aged Care developments in remnant bushland, which will destroy the most valuable conservation corridor lands in the City of Kalamunda, must stop. Existing cleared and urbanised lands elsewhere need to be used instead. This practice is not discussed in the draft Biodiversity Strategy as a threatening process.

The coordinated management of weeds needs to be a program supported by all of the City of Kalamunda's departments and undertaken over 3-5 years. Spraying for one year is not effective, is expensive and requires too much herbicide. Co-ordination of weed spraying across the City of Kalamunda's business and operations was implemented following the implementation of the 1995 District Conservation Strategy Policy, but has lapsed. It needs to be re-introduced.

The WSWA recommends that tree lopping of hollow trees containing bat colonies should be less enthusiastic.

- » Other issues that the WSWA would like to see addressed, or more strongly addressed, in the Biodiversity Strategy to increase protection and management of natural areas include the following:
- » the status of natural areas within the City
- » the viability and resilience of natural areas with buffers and ecological linkages
- » long term community engagement in biodiversity management
- » recognition and preservation of natural bush areas
- » retention of natural vegetation by private landholders
- » restoration of degraded remnant native vegetation
- » use of local provenance plants for planting, climate-change modified
- » Phytophthora dieback precautions and treatment
- » Myrtle Rust monitoring, identification, reporting, removal, treatment and eradication. Myrtle Rust is not listed as a threat, but it is a serious threat
- » feral woody weeds control
- » roadworks such as road widening for purported safety reasons
- » prescribed burning for fire management and the devastating impact that poorly formulated targets and practices have on both flora and fauna biodiversity. Note that the WSWA has recently prepared a soon to be approved Position Statement on Prescribed Burning that the City of Kalamunda can obtain on request.

Final comments and conclusion

The draft Biodiversity Strategy states that the City of Kalamunda wants to implement least cost opportunities for improving the protection status and condition of local natural areas. This is not an acceptable position. Our biodiversity is irreplaceable and immensely valuable. If our native vegetation is worth protecting, it is worth spending money protecting and restoring it. One would hardly imagine the French people not spending millions of Euros protecting and now restoring one of their greatest assets, Notre Dame Cathedral. Our forests and other natural areas are our cathedral. We should be spending likewise to preserve and restore them.

Many of the recommendations and proposed actions in the draft Biodiversity Strategy are commendable. We encourage the City to undertake what is recommended and proposed.

Yours faithfully,

<http://www.wildflowersocietywa.org.au/>

Brett Loney

Vice President and Chair, Conservation Sub-Committee

Wildflower Society of Western Australia

PO Box 519, Floreat WA 6014



Example of Communications

- » Content was posted on the **City's Website**: Linking to contributing nodes, for example EngagementHQ and social media;
- » **Shared with Stakeholders**, such as local schools for placement in their newsletters;
- » An **Advert** was placed in the local newspaper , Kalamunda Echo on 19 February 2021 (see over page)
- » An **Electronic Direct Mail (EDM) Campaign** ie. eNewsletters (See over page)
- » Promoted at the **City's Environmental Showcase**, held on 11 April 2021;
- » The **Survey** received 16 responses and 18 Submissions. A hard copy and online version were made available for accessibility. (See sample below right);
- » **Social Media** received over 15,956 impressions and 407 engagements. Sentiment was positive in response to the draft Local Biodiversity Strategy campaign. (See following pages);
- » **Media Release**;
- » **Posters/flyers** to all City's buildings (see flyer below left);
- » **Letters** to community members (see right) ;
- » **FAQs**; and
- » **Face-to-Face** and via telephone conversations.

City of Kalamunda

Have we got it right?

Draft Local Biodiversity Strategy 2020-2030

The City of Kalamunda has released a draft Local Biodiversity Strategy 2020-2030 for public comment. This strategy will underpin how the City will manage Biodiversity in the City for the next ten years.

We ask it is important that you comment on our draft Local Biodiversity Strategy so we can make it as good as possible for the future.

Feedback extended closing 15 April 2021, 5pm

1. How would you rate the draft Local Biodiversity Strategy?

Rating	Very good	Good	Fair	Poor	Very poor
1	5	10	15	10	5

2. Why did you rate the Strategy this way?

3. The Strategy proposes that the City should... (Select one or more)

Statement	Very important	Important	Less important	Not important	
1. Increase the protection of priority natural areas in the City including...	5	10	15	10	5
2. Increase the protection of priority natural areas in the City including...	5	10	15	10	5
3. Increase the protection of priority natural areas in the City including...	5	10	15	10	5
4. Increase the protection of priority natural areas in the City including...	5	10	15	10	5
5. Increase the protection of priority natural areas in the City including...	5	10	15	10	5

4. Do you find the draft Local Biodiversity Strategy necessary to be implemented?

Yes No Neither

Submit

Thank you for your feedback!

City of Kalamunda

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Submit

Thank you for your feedback!

City of Kalamunda

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4. Do you find the draft Local Biodiversity Strategy necessary to be implemented?

Yes No Neither

Submit

Thank you for your feedback!

Electronic Direct Mail (EDM) Campaign

News and Happenings in the City eNewsletter - 2 March 2021

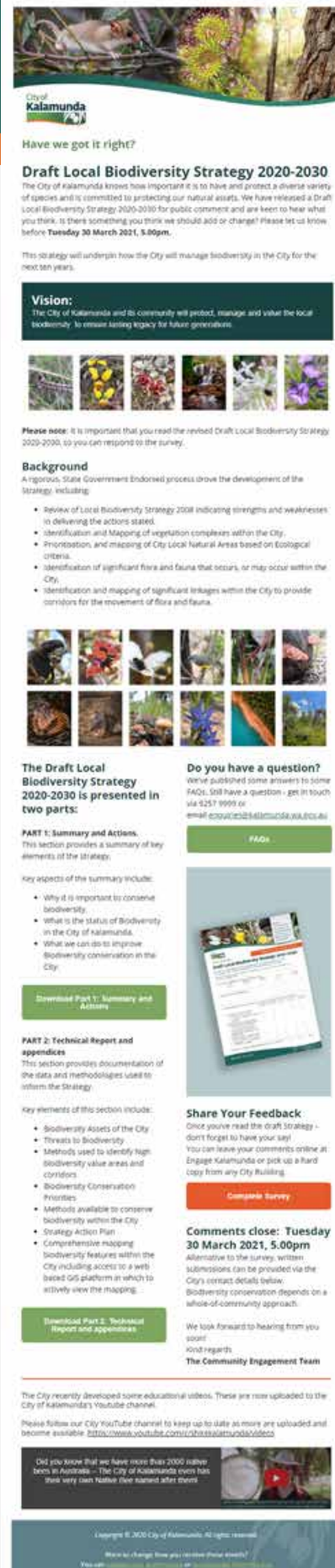
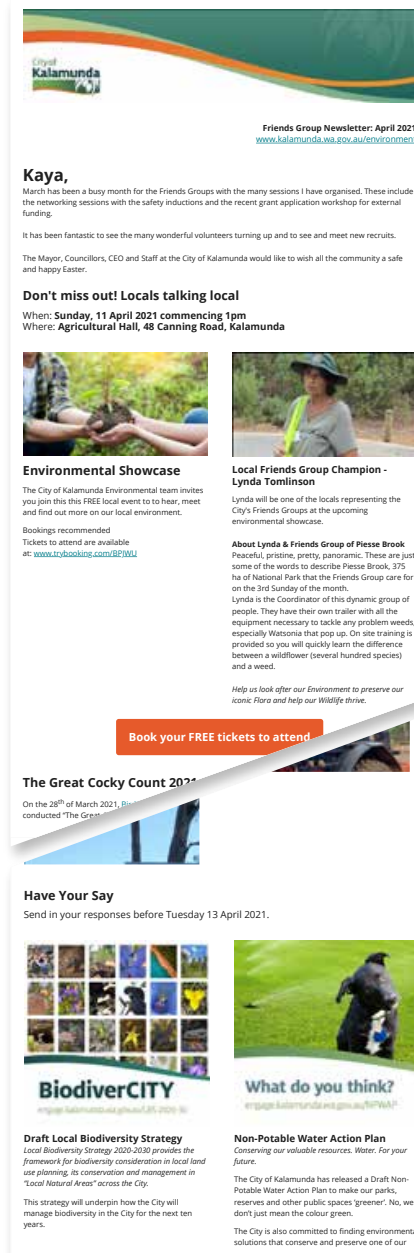
- Friends Group Local
Biodiversity Strategy
eNewsletter -
11 March 2021** *(Far right)*

- ## News and Happenings in the City eNewsletter - 1 April 2021

- Friends Group Easter
eNewsletter -
1 April 2021 (Right)**

- » Registered members of Friends Groups (100 email addresses)
- » Successful Deliveries:100
- » Recipients Who Opened:55 (55.0%)
- » Total Opens:221

Page 68





Have we got it right?
Draft Local Biodiversity Strategy 2020-2030

The City of Kalamunda has released its Draft Local Biodiversity Strategy (2020-2030) for public comment. This strategy will underpin how the City will manage biodiversity in the City for the next ten years.

For more information on the Strategy and to complete the short survey visit:

engage.kalamunda.wa.gov.au/LBS-2020-30

Alternative to the survey, written submissions can be provided via:

Online: engage.kalamunda.wa.gov.au/LBS-2020-30
 Email: enquiries@kalamunda.wa.gov.au
 Post: PO Box 42, Kalamunda WA 6926
 In Person: City of Kalamunda, 2 Railway Road, Kalamunda

Have your say before 30 March 2021, 5.00pm!

The City is committed to delivering environmental sustainability and maintaining the integrity of the natural environment.

City of Kalamunda

kalamunda.wa.gov.au



Your Voice | Our Community | One Future
Have your say!

Do you live, study, work or visit the City of Kalamunda?


Have a say on active projects conducted throughout the year! We are keen to hear the feedback, thoughts and ideas on projects, policies and matters, soon the conversation!

engage.kalamunda.wa.gov.au

- Proposing 40km/h zones in Kalamunda Centre - Showers, safer active streets. Feedback closes 15 March 2021.
- Non-Potable Water Action Plan - conserve and preserve water! Feedback closes 30 March 2021.
- Draft Local Biodiversity Strategy 2020-2030 Feedback closes 30 March 2021.

City of Kalamunda

kalamunda.wa.gov.au



Have we got it right?
Draft Local Biodiversity Strategy 2020-2030

The City of Kalamunda has released a Draft Local Biodiversity Strategy 2020-2030 for public comment. This strategy will underpin how the City will manage biodiversity in the City for the next ten years.

Vision:
 The City of Kalamunda and its community will protect, manage and value the local biodiversity to ensure lasting legacy for future generations.

Background
 A rigorous, State Government Endorsed process drove the development of the Strategy, including:

- Review of Local Biodiversity Strategy 2008 indicating strengths and weaknesses in delivering the actions stated.
- Identification and Mapping of vegetation complexes within the City.
- Identification and mapping of City Local Natural Areas based on Ecological criteria.
- Identification of significant flora and fauna that occurs, or may occur within the City.
- Identification and mapping of significant linkages within the City to provide corridors for the movement of flora and fauna.

Part 2: Technical Report and appendices
 This section provides documentation of the data and methodologies used to inform the Strategy.

Key elements of this section include:

- Biodiversity Assets of the City
- Threats to Biodiversity
- Methods used to identify high biodiversity value areas and corridors
- Biodiversity Conservation Priorities
- Methods available to conserve biodiversity within the City Strategy Action Plan
- Comprehensive mapping biodiversity features within the City including access to a web-based GIS platform in which to actively view the mapping.

The Draft Local Biodiversity Strategy 2020-2030 is presented in two parts:

PART 1: Summary and Actions
 This section provides a summary of key elements of the strategy. Key aspects of the summary include:

- Why it is important to conserve biodiversity.
- What is the status of Biodiversity in the City of Kalamunda
- What we can do to improve Biodiversity conservation in the City

For more information
 on the proposal, related projects and to complete the short survey visit:

engage.kalamunda.wa.gov.au/LBS-2020-30

Alternative to the survey, written submissions can be provided via:

Email: enquiries@kalamunda.wa.gov.au
 Post: PO Box 42, Kalamunda WA 6926
 In Person: City of Kalamunda, 2 Railway Road, Kalamunda

Have your say before 13 April 2021, 5.00pm!

City of Kalamunda

kalamunda.wa.gov.au

Social Media | Campaign post insights



An integrated social media campaigns was run across the City's LinkedIn, Facebook, Twitter and Instagram accounts, with Facebook receiving the largest proportion of engagement. Below is a sample of some of the top posts.

Social Media Campaign | Top Posts



February 18, 2021 08:19pm

🌿🐾🐞 Biodiversity is the variety of ALL things living, from the largest animals and plants to the smallest micro-organisms. It includes all the cute, cuddly, highly publicised animals AND the ugly, frightening creatures. They are all important. Do you want to know more about what the City is doing to protect our natural assets...

Impressions	Engagements	Likes/Comments/Shares	Eng. Rate
2,123	55	25	1.98%

<https://www.facebook.com/114178051977993/posts/3852066721522422>



March 11, 2021 7:03pm

Fascinating Fact: Current records list 407 native species of fauna in the City. Thirteen of which require special protection. (DBCA, January 2020). When you next go for a walk check out how many different species of animals you can spot. The City of Kalamunda has released its Draft Local Biodiversity Strategy 2020-2030 for public comment...

Impressions	Engagements	Likes/Comments/Shares	Eng. Rate
1,730	28	15	0.92%

<https://www.facebook.com/114178051977993/posts/3913371255391968>



February 22, 2021 08:24pm

🌿🐾🐞 Biodiversity is essential, both in its own right and for the survival of the human species. It contributes to healthy soil, waterways and clean air, all which directly and indirectly benefit us. Due to interactions between species, one small change may have a major impact on other species. 🏡 The City of Kalamunda has released its Draft Local Biodiversity...

Impressions	Engagements	Likes/Comments/Shares	Eng. Rate
1,535	50	15	3.00%

<https://www.facebook.com/114178051977993/posts/3861984887197272>



March 4, 2021 06:58pm

Fascinating Facts: Recent studies of carnivorous plants in the southwest of Western Australia showed that this region has 4.5 times higher diversity of carnivorous plants than any other comparable region, with parts of the City being highly significant for these plants.* The City of Kalamunda has released its *Draft Local Biodiversity Strategy 2020-2030 for public comment...

Impressions	Engagements	Likes/Comments/Shares	Eng. Rate
1,149	28	7	0.96%

<https://www.facebook.com/114178051977993/posts/3895670893828671>



February 28, 2021 8:30pm

🐝🌸 Fascinating Facts: Did you know many of our native flowers need sonication (buzz pollination) by our native bees to prevent damage to their delicate blooms and spread their pollen? In contrast, European Honeybees are heavy and cannot perform buzz pollination. There are over 2000 native bee species in Australia, 800 of which occur across Western...

Impressions	Engagements	Likes/Comments/Shares	Eng. Rate
1,070	5	1	0.47%

<https://www.facebook.com/114178051977993/posts/3885820534813707>



March 4, 2021 06:58pm

Fascinating Facts: Recent studies of carnivorous plants in the southwest of Western Australia showed that this region has 4.5 times higher diversity of carnivorous plants than any other comparable region, with parts of the City being highly significant for these plants.* The City of Kalamunda has released its *Draft Local Biodiversity Strategy 2020-2030 for public comment...

Impressions	Engagements	Likes/Comments/Shares	Eng. Rate
876	20	3	2.17%

<https://www.facebook.com/114178051977993/posts/3963592970369796>



"Not one mention of a tree retention policy. The City of Kalamunda has the fastest declining canopy cover in WA. Significant trees must be retained whether they be in existing properties or on new subdivisions."

FB Comment

* We agree that our trees and forest canopy are extremely important to the City and our community. So important in fact, that we have developed a separate Strategy to address how we manage our urban forest into the future. Check out our Draft Urban Forest Strategy, here: <https://engage.kalamunda.wa.gov.au/draft-urban-forest...>

City of Kalamunda response

"I love those plants. They have always fascinated me from childhood"

FB Comment

[Ref: Ensuring our sticky plants stick around]

"Brilliant"



Instagram Comment

*Names have been redacted.



March 5, 2021 06:58pm

Fascinating Facts: Recent studies of carnivorous plants in the southwest of Western Australia showed that this region has 4.5 times higher diversity of carnivorous plants than any other comparable region, with parts of the City being highly significant for these plants.* The City of Kalamunda has released its *Draft Local Biodiversity Strategy 2020-2030 for public comment.

Impressions	Engagements	Likes	Comments	Saves	Eng. Rate
604	35	32	2	1	5.79%

<https://www.instagram.com/p/CMCNbQ0Myle/>



February 17, 2021 08:19pm

Biodiversity is the variety of ALL things living, from the largest animals and plants to the smallest micro-organisms. It includes all the cute, cuddly, highly publicised animals AND the ugly, frightening creatures. They are all important. Do you want to know more and what the City is doing to protect our natural assets The City of Kalamunda has released its Draft . .

Impressions	Engagements	Likes	Comments	Saves	Eng. Rate
583	22	18	2	2	3.77%

<https://www.instagram.com/p/CLZJ-6sMZdC/>



March 12, 2021 07:03pm

Fascinating Fact: Current records list 407 native species of fauna in the City. Thirteen of which require special protection. (DBCA, January 2020). When you next go for a walk check out how many different species of animals you can spot. The City of Kalamunda has released its Draft Local Biodiversity Strategy 2020-2030 for public comment. . .

Impressions	Engagements	Likes	Comments	Saves	Eng. Rate
471	13	10	1	2	2.76%

<https://www.instagram.com/p/CMUPKX1s-CG/>



February 26, 2021 08:30pm

Fascinating Facts: Did you know many of our native flowers need sonication buzz pollination by our native bees use to prevent damage to their delicate blooms and spread their pollen In contrast, European Honeybees are heavy and cannot perform buzz pollination. There are over 2000 native bee species in Australia, 800 of which occur. . .

Impressions	Engagements	Likes	Comments	Saves	Eng. Rate
457	17	15	1	1	3.72%

<https://www.instagram.com/p/CLwW6usQ9y/>



"I went for a walk on the trails in the bush land area on the corner of watsonia and gooseberry hill roads the other day and noticed that the large signs stating the reserve name and many of the walk trail signs have been removed. Is this going to be another development site? Plenty of biodiversity to be lost there."

FB Comment

"Dust and sand control also needs to be addressed."

FB Comment

"Bush corridors should be a focus"

FB Comment

"City of Kalamunda so important in fact that Cambridge reserve is being rezoned so that almost half of it can be cleared for housing and aged care"

FB Comment

"Hey [redacted] * have you had a look at this? If you have I am interested to know what you think. Is it enough? On the right track? Missing anything?"

FB Comment

"Great work looks good" 🍌👍

Linkedin Comment

Quick Poll

A poll was designed to gain a quick understanding of community sentiment for the LBS. Social Media users were asked to respond using emojis as feedback. Disappointingly, although the Facebook post had 513 impressions, no responses were received.

Instagram received 10 x ❤️ = Yes, supportive of the Plan. 0 x 😐 = unsure. 0 x 😞 = No (not a fan)



March 29, 2021 1:41pm

QUICK POLL: 🌿🐝🦋🐌🐛 Do you care about Biodiversity? Have your say at! <http://engage.kalamunda.wa.gov.au/lbs-2020-2030>

Quick vote in the comments with your icons:

❤️ = Yes, Love the City's Plan 😐 = unsure 😞 = Not one of my interests.

Biodiversity: the variety of all life forms - the different plants, animals and micro-organisms, the genes they contain, and the ecosystems they form.

Impressions	Engagements	Likes	Comments	Saves	Eng. Rate
534	11	10	0	1	3.53%



https://www.instagram.com/p/CM_cUJ8rAD6/