

Draft Local Biodiversity Strategy – Schedule of Submissions

Submitter No.	Submission	City Response
1.	<p>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.</p>	Noted- no specific comment on the Draft Local Biodiversity Strategy (LBS) provided.
	<p>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.</p>	Noted- no specific comment on the Draft LBS provided.
	<p>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;</p>	The City are already implementing a number of actions relating to biodiversity through the planning and

	<p>that was for most the primary attraction for their choice to settle in this extensively biodiverse environment .</p> <p>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.</p>	<p>development process (see Section 1.6 of the Draft LBS 2023-2043 Part 2), such as:</p> <ul style="list-style-type: none"> • Implementation of the City's Public Open Space Strategy; • Creating a new full-time role of Environmental Planner to assist with assessment and management of environmental values; • Structure planning to retain natural areas containing threatened ecological communities, threatened flora, and buffers to wetlands and watercourses. • Retaining areas with high biodiversity value within areas of Public Open Space through the approval conditions relating to subdivisions. • Proactive monitoring of compliance with permit conditions relating to environmental outcomes. • Adoption and implementation of Local Planning Policy 33 – Tree Retention to minimise the removal of trees and to maintain and increase canopy cover. • Drafting and advertising of Local Planning Policy 34 – Wetlands and Waterways to provide guidance regarding the protection and management of wetlands and waterways; • Commenced drafting Local Planning Scheme No. 4 with added provisions for biodiversity protection and consideration. • Created wetland areas and vegetated swales in new developments in accordance with Water Sensitive Urban Design.
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	<p>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 Daft, 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.</p>	<p>Since the time that this submission was received, the City have employed a full-time Environmental Planner to assist with the assessment of planning applications and management of impacts to environmental values.</p> <p>The Draft LBS 2023-2043 includes an action to identify opportunities to partner with other agencies, universities, private sector, NGOs, and community groups to deliver research projects to improve understanding and best-practice management relating to biodiversity.</p>
	<p>Shortage of Environmental/ Biodiversity Professionals? Furthermore, a shortage of appropriate professional staff capability employed to discharge responsibility for biodiversity conservation locally could, but has not been, reported to the relevant State Government</p>	<p>As above, the City have employed a full-time Environmental Planner to assist with the assessment of planning applications and management of impacts to environmental values.</p>

	<p>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.</p> <p>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 !</p> <p>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.</p>	<p>The DRAFT LBS 2023-2043 includes an action to identify opportunities to partner with other agencies, universities, private sector, NGOs, and community groups to deliver research projects to improve understanding and best-practice management relating to biodiversity.</p> <p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p> <p>Separately, the review of the City's performance presented in Appendix E of the advertised LBS 2020 did not accurately capture the City's performance. The review quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. The datasets used to determine this figure were DPIRD</p>
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		<p>“native vegetation extent” data from 2005 and 2020. The methodology for mapping native vegetation extent was modified between these two datasets and resulted in a significant change to the mapped area of native vegetation, where there was no physical vegetation loss. The quoted vegetation loss was a result of the two datasets being erroneously used for comparative purposes and not adequately interrogated. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p>
	<p>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.)</p>	<p>Noted- no specific comment on the Draft LBS 2020 provided.</p>
	<p>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.-</p>	<p>Noted- no suggested improvements provided by submitter.</p>

	<p>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.)</p>	<p>The Draft LBS 2023-2043 has been revised to include provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the Draft LBS 2023-2043. A preliminary resourcing assessment has been undertaken for the implementation of the Draft LBS 2023-2043.</p> <p>The Draft LBS 2023-2043 builds on the actions already adopted and being implemented by the City under the <i>Kalamunda Clean and Green Local Environment Strategy</i>. It is for this reason that the Draft LBS 2023-2043 focusses on improving biodiversity consideration, protection and management in the planning space.</p>
	<p>Alternative Proposals for Action to implement a new Biodiversity Strategy for City of Kalamunda.-</p> <p>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.</p> <p>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 .</p> <p>c). Plan and prepare for extensive on-going regular ‘State of Environment’ analyses and reporting.</p> <p>d). Active participation through both internal and external ‘networking’ in rewriting a local Environmental Land Use analysis</p>	<p>a) The Draft LBS 2023-2043 provides and action to identify the human resource needs for implementation of the Strategy.</p> <p>b) The City implements a number of engagement actions in accordance with the adopted <i>Kalamunda Clean and Green Local Environment Strategy</i>. The Draft LBS 2023-2043 seeks to build on these and includes a key focus area to “Engage”.</p>

	<p>that is Biodiversity Conservation rather than development Planning orientated.</p> <p>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.</p> <p>f). Share information with neighbouring Local Authorities where local biodiversity overlaps legal boundaries.</p>	<p>c) The Draft LBS 2023-2043 includes strategic objectives to “improve knowledge of the ecological values within the City’s local natural areas (LNAs) and understand their threatening processes”, as well as, “develop, expand and manage a central ecological database”. The LBS also includes provisions for ongoing monitoring and reporting against the LBS actions.</p> <p>d) The Draft LBS 2023-2043 includes a desktop prioritisation process to identify and map Priority Local Natural Areas (PLNAs) across the City. The Natural Area Prioritisation Scores inform the LBS actions. For example City PLNAs with a score above 28 will be prioritised for the development of individual environmental management plans.</p> <p>e) Action 5.5 of the Draft LBS 2023-2043 includes updating the Environmental information on the City’s public mapping system (Intramaps).</p> <p>f) There are very few areas relevant to the LBS that contain LNAs which overlap the City’s boundary. As such, this is not seen as a key action for inclusion. However, the City will consider consulting with adjoining Local Government Authorities on a case-by-case basis.</p>
	<p>However, before implementing a new Strategic framework for action, this Local Authority must honestly contemplate -</p>	<p>The Draft LBS 2023-2043 focusses on the actions within the City’s sphere of influence. As above, the Draft LBS 2023-2043 has been revised to include</p>

	<p>1. Whether it is truly capable of continuing as formal custodian of the unique and complex local Perth Hills biodiversity in terms of-</p> <p>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.)</p> <p>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.</p>	<p>provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the Draft LBS 2023-2043.</p>
	<p>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</p>	<p>Noted.</p>

	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.	
2.	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.	This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAS.
3.	<p>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.</p> <p>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.</p> <p>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</p>	Noted. The potential environmental impacts of the proposal to rezone Wattle Grove South are currently being assessed by the State Environmental Protection Agency.

	<p>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.</p>	
	<p>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.</p>	<p>As above, the review of the City’s performance presented in Appendix E of the advertised LBS 2020 did not accurately capture the City’s performance. The review quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. The datasets used to determine this figure were DPIRD “native vegetation extent” data from 2005 and 2020. The methodology for mapping native vegetation extent was modified between these two datasets and resulted in a significant change to the mapped area of native vegetation, where there was no physical vegetation loss. The quoted vegetation loss was a result of the two datasets being erroneously used for comparative purposes and not adequately interrogated. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>The LBS includes a target to increase the conservation protection status of 500 ha land, containing approximately 270 ha of native vegetation. This is a</p>

		<p>significant improvement on the protection of 2.2 ha of LNAs reported in the LBS 2020.</p>
	<p>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).</p>	<p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>
	<p>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).</p>	<p>Since the time that this submission was received the City have adopted Local Planning Policy 33- Tree Retention for implementation and have adopted Draft Local Planning Policy 34- Wetlands and Waterways for advertising.</p> <p>The Draft LBS 2023-2043 includes and action to develop a local planning policy for biodiversity protection and management. The LBS 2023 also includes an action to incorporate biodiversity</p>

		<p>provisions into the City's Local Planning Scheme 4 (in draft).</p>
	<p>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: -Biodiversity data and loss of tree canopy -Organisational mismanagement -Zoning and environmental values.</p>	<p>This figure does not present the retention of existing rural zonings as the single greatest opportunity to protect biodiversity. There is a large portion of native vegetation on rural land that is currently not formally protected and additional policy or land tenure provisions may be needed.</p> <p>The LBS presents a number of opportunities for biodiversity conservation, such as increasing protection of the City's reserves and open space, as well as developing a local planning policy for biodiversity conservation which would apply to new development.</p>
	<p>In addition to the overarching areas noted above, our key comments include recommended improvements to the Strategy related to providing:</p> <ul style="list-style-type: none"> • 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. 	<p>The LBS includes a framework for the:</p> <ul style="list-style-type: none"> • Establishment of a working group • Development of an Annual Implementation Plan (prioritise actions, determine KPIs, resources) • Development of a Monitoring and Evaluation Program to track the progress of actions, success against target, goals and objectives. • Annual reporting • Four yearly review of the LBS, for continual improvement.

	<p>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.</p>	
	<p>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.</p> <p>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.</p>	<p>Noted. Section 1.6 of the Draft LBS includes a list of key City achievements relating to biodiversity, since the development of the 2008 strategy. The City recognises that there is an opportunity to significantly improve the protection of natural areas and commits to striving to protect an additional 500ha of land, containing approximately 270ha of vegetation.</p>
	<p>Biodiversity data – a clean sweep</p> <p>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.</p> <p>In order to protect biodiversity, which is the variety of all living things, the city purported to have adopted the following 'vision' in 2008:</p> <p>The City of Kalamunda and its community will protect, manage and value the local biodiversity to ensure lasting legacy for future</p>	<p>Noted.</p>

	<p>generations.</p> <p>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.</p>	
	<p>i. Clearing at a rate of 53 hectares a year</p> <p>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.</p> <p>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).</p>	<p>The City recognises that there is an opportunity to significantly improve the protection of natural areas and through the LBS commits to striving to protect an additional 500ha of land, containing approximately 270ha of vegetation.</p> <p>The review of the City's performance presented in Appendix E of the advertised LBS 2020 did not accurately capture the City's performance. The review quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. The datasets used to determine this figure were DPIRD "native vegetation extent" data from 2005 and 2020. The methodology for mapping native vegetation extent was modified between these two datasets and resulted in a significant change to the mapped area of native vegetation, where there was no physical vegetation loss. The quoted vegetation loss was a result of the two datasets being erroneously used for comparative purposes and not adequately interrogated. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation</p>

		<p>loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p>
	<p>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).</p>	<p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>
	<p>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%.</p> <p>This disastrous situation has developed despite Priority 2 of the city's <i>Strategic Community Plan Kalamunda Advancing 2027</i> requiring the city to 'deliver environmental sustainability and maintain the integrity of the natural environment'.</p> <p>Despite repeating this commitment in various iterations of the plan</p>	<p>The figures quoted in the City's <i>Environmental Land Use Planning Strategy 2019</i> relate to canopy coverage on lots developed or redeveloped between 2009 to 2016 by suburb. This figure does not indicate suburb-wide loss.</p> <p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p>

	<p>since 2013, the city still managed to achieve nationwide ecological infamy in the 2020 RMIT study, confirmed by data in the current draft strategy.</p>	<p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>
	<p>Diminishing trust The evidence base shows significant gaps between the green credentials claimed in city publications and the reality on the ground.</p> <p>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.</p> <p>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.</p> <p>Rezoning the area to urban will remove most (if not all) obligations</p>	<p>Noted.</p>

	<p>on land developers to preserve irreplaceable biodiversity and wildlife corridors (see Appendix B).</p> <p>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.</p> <p>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.</p> <p>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.</p>	
	<p>Role of developers</p> <p>The <i>Environmental Protection Act 1986</i> contains provisions designed to regulate the clearing of native vegetation. However, these provisions do not apply to areas that are approved for urban subdivision.</p> <p>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.</p>	<p>This is not an accurate comment and is assumed to be referring to exemptions for clearing permits under Part V of the <i>Environmental Protection Act 1986</i> (EP Act), which apply (conditionally) to approved subdivisions. The proposed rezoning of Wattle Grove South is currently being formally assessed by the State Environmental Protection Agency under Part IV of the EP Act.</p>

	<p>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.</p> <p>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.</p>	
	<p>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.</p> <p>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.</p> <p>EcoVision has previously exposed the failure of officer reports to</p>	<p>Noted. As the LBS is a high-level strategy it does not include detailed site-specific studies. However, site-specific studies may be undertaken post-adoption of the LBS in accordance with the actions. It is noted that site specific studies of private landholdings are considered through the planning and development process. As above, the Environmental Protection Agency are currently assessing the proposed rezoning of Wattle Grove South, including detailed site-specific studies.</p>

	<p>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.</p> <p>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).</p> <p>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.</p>	
	<p>Lack of accountability</p> <p>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.</p> <p>The city's Information Statement 2020/21 states that the city has three directors who are directly responsible to the chief executive</p>	<p>Noted. No specific comment on the Draft LBS.</p>

	<p>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.</p> <p>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.</p>	
	<p>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’.</p> <p>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.</p> <p>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).</p> <p>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</p>	<p>Section 1.6 of the Draft LBS includes a list of key City achievements relating to biodiversity, since the development of the 2008 strategy. This list includes (but is not limited to):</p> <ul style="list-style-type: none"> • adopting <i>Local Planning Policy 33 – Tree Retention</i> to minimise removing trees of a certain size and maturity to maintain and increase canopy cover. • drafting and publicly advertising Local Planning Policy 34 – Wetlands and Waterways to guide managing wetlands to protect them from the impacts of development, improve water quality, and manage potential risks of property damage; • commencing drafting Local Planning Scheme No. 4, adding provisions for biodiversity protection and consideration.

	omission, either deliberate or the result of inadequate backroom coordination.	The Draft LBS 2023-2043 includes an action to develop a local planning policy for biodiversity.
	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.	Noted. No specific comment on LBS.
	<p>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'.</p> <p>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.</p>	The Draft LBS 2043-2043 includes "Link" as one of four key focus areas, along with the following goal which is supported by the LBS action plan (Section 6 of the LBS); <i>Maintain and improve local and regional ecological linkages that allow flora and fauna species movement and the flow of genetics throughout the landscape.</i>
	<p>Weakness in annual reporting</p> <p>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:</p> <p><i>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).</i></p>	The LBS does not present the retention of existing rural zonings as the only opportunity to protect biodiversity.

	<p>Even more worrying is the CEO's misplaced pride in announcing that:</p> <p><i>We have driven the rezoning of key areas of rural land within the city</i> ... (p. 5)</p> <p>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.</p> <p>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.</p> <p>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.</p>	
	<p>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.</p>	<p>Noted.</p>

	<p>Priority 2 in the plan reads as follows:</p> <p>Kalamunda Clean and Green: delivering environmental sustainability and maintaining the integrity of the natural environment.</p> <p>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).</p>	
	<p>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</p>	<p>Noted.</p>

	<p>actions from electors.</p> <p>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.</p> <p>This conclusion is supported by the summary (draft, p. 8) which states:</p> <p>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.</p>	
	<p>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.</p> <p>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.</p>	<p>The review of presented in Appendix E of the advertised LBS 2020 quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. As such, the rate of clearing that has occurred across the City of Kalamunda cannot accurately be quantified using available datasets. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>The Draft LBS 2023-2043 includes an action to; <i>Investigate the inclusion of provisions for rural land uses in Local Planning Scheme 4 that provide for biodiversity retention and management, such as:</i></p>

	<p>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.</p>	<p>a. <i>Extending land use provisions to facilitate business opportunities that are compatible with natural areas (e.g., ‘care farms’ or conservation cooperatives);</i> b. <i>Providing flexibility in minimum lot size (where average lot size and/or total lot yield is maintained) to minimise the need for vegetation clearing and maximise vegetation retention.</i></p>
	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Noted.</p> <p>State and Local Planning Frameworks are required to consider the availability and suitability of land for urban purposes having regard to a range of social, economic and environmental considerations.</p>
	<p>Urban free-for-all The record shows that in not a single instance since 2008 has a</p>	<p>The statement, “under ‘urban’ zoning, all protections are removed” is not factually correct. While conditional</p>

	<p>change to land- use provisions in the city included mechanisms, legally enforceable or otherwise, to fully protect the natural environment, including tree canopy.</p> <p>Indeed, under ‘urban’ zoning, all protections are removed, notwithstanding so-called appeals by councillors for prospective developers to ‘consider the environment’ in their plans.</p> <p>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).</p> <p>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.</p> <p>Sadly, the voting bloc of councillors have shown through their actions that they remain wilfully blind to the environmental disaster unfolding in the city.</p> <p>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).</p> <p>It is a simple and necessary story of logic and science, in an age of responsibility.</p>	<p>exemptions apply for clearing permits for approved subdivisions, impacts to biodiversity in urban areas are regulated under the <i>Environmental Protection Act 1986</i>, the <i>Biodiversity Conservation Act 2016</i>, the <i>Environment Protection and Biodiversity Conservation Act 1999</i> and are considered through the planning and development process, consistent with state and local policy requirements, including <i>Local Planning Policy 33- Tree Retention</i> which was adopted by Council in December 2022.</p> <p>It is acknowledged that land use changes have historically occurred in the City of Kalamunda. Planning processes have occurred in the context of state and local statutory and policy requirements, including a range of social, economic and environmental considerations.</p> <p>As above, there is currently no dataset that can accurately determine the extent or rate of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha erroneously stated.</p>
	<p>Bulldozed</p>	<p>Noted.</p>

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>By their actions, not only have councillors failed to alert the public to</p>	
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	<p>environmental damage but they have also taken actions to conceal it.</p> <p>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.</p>	
	<p>What can be done?</p> <p>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.</p> <p>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.</p>	<p>As above, the review of the City's performance presented in Appendix E of the advertised LBS 2020 quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. There is currently no available dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>It is noted that in many instances vegetation clearing occurs in areas/ cases where the City has no authority, for example for State infrastructure/ road upgrades.</p>
	<p>The obvious practical reforms appear to EcoVision to include the following:</p> <ul style="list-style-type: none"> • Individual councillors should embrace the attitudes and values for which they were elected. 	<p>These recommendations are noted, however are largely beyond the scope of the draft LBS.</p>

	<ul style="list-style-type: none"> • Dysfunctional local council governance should be improved, perhaps as follows: <ul style="list-style-type: none"> • 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. 	<p>The draft LBS will provide a strategic basis to support the conservation and enhancement of local natural areas.</p> <p>Actions within the draft LBS will support engagement with the community on local biodiversity management and enhancement.</p>
	<p>Embrace electors’ values</p> <p>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.</p> <p>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.</p> <p>While this imbalance has been reflected by successive councils since</p>	<p>Noted.</p>

	<p>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.</p> <p>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.</p> <p>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.</p>	
	<p>Improve governance</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>These recommendations are noted, however are largely beyond the scope of the draft LBS.</p> <p>Amenity and environmental considerations are embedded throughout the WA Planning System. The introduction and ongoing monitoring and review of environmental strategies like the LBS maintain focus and highlight the importance of environmental protection within the City.</p>

	<p>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.</p>	<p>Rezoning proposals are referred to the State Environmental Protection Authority for assessment under Part IV of the <i>Environmental Protection Act 1986</i>. Additionally, impacts to biodiversity are regulated under the <i>Biodiversity Conservation Act 2016</i>, the <i>Environment Protection and Biodiversity Conservation Act 1999</i> and are considered through the planning and development process, consistent with state and local policy requirements, including <i>Local Planning Policy 33-Tree Retention</i> which was adopted by Council in December 2022.</p>
	<p>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.</p>	<p>This figure does not present the retention of existing rural zonings as the single greatest opportunity to protect biodiversity. There is a large portion of native vegetation on rural land that is currently not formally protected and additional policy or land tenure provisions may be needed.</p> <p>The LBS presents a number of opportunities for biodiversity conservation, such as increasing protection of the City's reserves and open space, as well as developing a local planning policy for biodiversity conservation which would apply to new development.</p>

	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Noted.</p>
	<p>Support residents in state government review</p> <p>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.</p> <p>Instead of pursuing an unbridled development agenda, the council should restore faith with residents by adopting a true conservationist position regarding the review.</p>	<p>Noted.</p>
	<p>In particular, the council should:</p> <ul style="list-style-type: none"> 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 	<p>Noted.</p> <p>The Crystal Brook Concept Plan has been directly informed by detailed consultation and design collaboration with local residents and landowners. The Concept Plan provides a vision and principles, concept</p>

	<p>considerations.</p> <p>c) ensure that the remaining rural areas of the city are equally protected from urban/industrial/commercial subdivision.</p> <p>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.</p> <p>This review is an excellent opportunity for councillors to show they have moved on and become what electors expect.</p>	<p>plan map and implementation strategies which will form a consideration of future planning for this area.</p>
	<p>Eschew weasel words that hide the truth</p> <p>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.</p> <p>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!</p> <p>As shown at the Special Meeting of Electors this month, the</p>	<p>Noted.</p>

	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.	
	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.	Noted.
	<p>There is no mention in the draft of the AECOM ecological surveys, RMIT findings or pertinent climate change data.</p> <p>Desktop analysis would have been more useful if actual fieldwork case study had been used for illustrative purposes, for example, the AECOM fieldwork.</p>	The LBS does not consider detailed site-specific studies, as it is a high-level strategy. Site specific studies are considered through the planning and development process. As above, the Environmental Protection Agency are currently assessing the proposed rezoning of Wattle Grove South, including detailed site-specific studies.
	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.	Revised maps have been included in the Draft LBS 2023-2043.
	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.	Noted.
	<p>Conclusion</p> <p>The public is starting to realise that exaggerated hyperbole about</p>	As above, the review of the City's performance presented in Appendix E of the advertised LBS 2020

	<p>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.</p> <p>The days of environmental destruction on steroids in our city must cease forthwith.</p> <p>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.</p> <p>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.</p>	<p>did not accurately capture the City's performance. The review quoted vegetation loss of 630 ha which is inaccurate. It is also noted that in many instances vegetation clearing occurs in areas/ cases where the City has no authority, for example for State infrastructure/ road upgrades.</p> <p>The City recognises that there is an opportunity to significantly improve the protection of natural areas and commits to striving to protect an additional 500ha of land, containing approximately 270ha of vegetation.</p>
	<p>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.</p> <p>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.</p>	<p>Noted.</p>

	<p>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.</p> <p>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:</p> <p>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.</p> <p>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.</p> <p>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.</p>	
	<p>Appendix A- Wattle Grove South case study</p>	<p>Noted.</p>

	Appendix B – Biodiversity in Wattle Grove South	Noted.
4.	<p>General- 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 in 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>	<p>The structure of the revised Draft LBS 2023-2043 has been simplified and the length of the documents reduced.</p> <p>Consistent with the recommendations of the Kalamunda Environmental and Sustainability Advisory Committee, the documents are presented in two parts, the first being a summary document for readers seeking a snapshot of the LBS and the second a detailed technical document for readers seeking to understand more about the LBS.</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.	This recommendation is currently being considered by the City.
	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.	Noted. The Draft LBS 2023-2043 includes the following actions which will address operational dieback procedures; Action 3.1, Action 3.9 and Action 3.6.

	<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 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> <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>	<p>The City are currently progressing the <i>Local Environment Strategy</i> Action to “determine ecological fire requirements and develop fire and biodiversity procedures for the management of City Reserves”.</p>
	<p>Regarding Page 5, paragraph 3 “...and over 630 hectares of native vegetation lost (Appendix E). “</p> <p>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</p>	<p>As outlined above, this data is erroneous and has not been included in the Draft LBS 2023-2043.</p>

	<p>misrepresent the role of the City in managing and protecting its lands.</p>	
	<p>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.</p>	<p>The revised Draft LBS 2023-2043 (Part 2) includes a section titled “What has the City done so far” which provides a detailed list of achievements relating to biodiversity since the development of the 2008 LBS, including increasing the number of Friends Groups implementing numerous restoration projects within the City. This section is also reflected in the Part 1 Summary document.</p>
	<p>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.</p>	<p>This comment is referring to the Natural Area Prioritisation Score figure. This figure is presented in the body of the report of the revised Draft LBS 2023-2043 (Part 2).</p>
	<p>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.</p>	<p>The term ‘least cost’ differs from ‘cost effective’ and is essentially a method of analysis. For example ‘least-cost’ modelling is used to determine ecological linkage pathways that provide the least resistance for fauna movement.</p> <p>A footnote has been added to the revised Draft LBS 2023-2043 for clarity.</p>
	<p>Page 12- Suggest this (definition of Local Natural Areas) could be made into a figure and incorporated into the main report. This</p>	<p>The revised Draft LBS 2023-2043 (Part 2) now includes a figure titled “Figure 1 Local Natural Areas Covered by</p>

	<p>concept is fundamental to people understanding what areas will be governed by the LBS.</p> <p>Further, this paragraph (4) 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.</p>	<p>the Local Biodiversity Strategy'. This figure also includes the boundaries of City managed reserves and Local Open Space.</p>
	<p>Paragraph 5- 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</p>	<p>This figure is not referenced in the Draft LBS 2023-2043, however a footnote has been added to Section 4.3.4 acknowledging that other fauna records may exist outside of the DBCA dataset.</p>
	<p>Page 24, paragraph 1- Atlas of Living Australia identifies more than 62 species of Fungi as being present in the City of Kalamunda. This figure should be refined.</p>	<p>This figure is not referenced in the Draft LBS 2023-2043, however a footnote has been added to Section 4.3.5 acknowledging that other fungi records may exist outside of the DBCA dataset.</p>
	<p>Page 24- 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.</p>	<p>The Draft LBS 2023-2043 does not go into detail regarding invertebrates, however, does acknowledge that the Short-tongued bee (<i>Leioproctus douglasiellus</i>; Endangered) has been recorded within the City.</p>
	<p>Page 24/28- 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</p>	<p>In the interest of keeping the documents as succinct as possible, black cockatoo roost mapping has not been included. However, the City has access to black</p>

	<p>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.</p>	<p>cockatoo habitat information and will consider this information during the implementation of the strategy.</p>
	<p>Page 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.</p>	<p>Section 5 of the Draft LBS 2023-2043 provides a link between the proposed responses to the identified threats and references specific action numbers.</p>
	<p>Page 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.</p>	<p>The natural area prioritisation scoring process used in the Draft LBS 2023-2043 follows the main principles of the State government endorsed methodology developed via the Perth Biodiversity Project (Del Marco et al 2004) and utilises the advances in mapping and prioritisation techniques used effectively by others since the City's first Local Biodiversity Strategy.</p>
	<p>Page 42, paragraph 3- <i>“Low prioritisation scores cannot be interpreted as those areas not containing significant biodiversity.”</i></p> <p>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.</p>	<p>Section 4.4.1 of the Draft LBS 2023-2043 revises this statement to read; <i>“A low NAPS does not indicate that an area does not contain significant biodiversity values, rather the NAPS is a tool used to prioritise the allocation of resources toward protecting, managing and enhancing the biodiversity of an area.”.</i></p>

	<p>Page 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.</p>	<p>Given the Draft LBS 2023-2043 is a City-wide strategy the detail shown on this map (now Figure 5) is considered appropriate for the scale. It is however noted that the revised figure includes the boundaries of City managed reserves and local open space.</p>
	<p>Page 46- As before, this terminology (least cost) is either very specialised or inappropriate. Please consider changing the phrase to "best value for investment" or "highest return on investment opportunity".</p>	<p>As above, the term 'least cost' differs from 'cost effective' and is essentially a method of analysis. For example 'least-cost' modelling is used to determine ecological linkage pathways that provide the least resistance for fauna movement.</p> <p>A footnote has been added to the revised Draft LBS 2023-2043 for clarity.</p>
	<p>Page 47, paragraph 4- "...the importance of some non- indigenous plants like pecans or macadamias to native animals can be considered..."</p> <p>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.</p>	<p>Noted. This information has been retained in the Draft LBS 2023-2043 (Section 4.3.7).</p>
	<p>Page 47-49, 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.</p>	<p>Noted. Engage is a key focus area of the revised Draft LBS 2023-2043.</p>

	Without political support, the action may well be politically difficult to pass through council.	
	Page 47-49, Target 2- Suggest adding a point to include installation of dieback status signage in al reserves managed by the City.	This specific comment has not been included, however the Draft LBS 2023-2043 includes a number of actions which will address operational dieback procedures, as well as City staff and community education.
	Page 47-49, 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.	This target has been removed from the Draft LBS 2023-2043. Specific, measurable criteria for the actions will be determined by the internal working group during the development of each annual implementation plan.
	<p>Page 47-49, Target 4.4- 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. 	This target has been removed from the Draft LBS 2023-2043. Specific, measurable criteria for the actions will be determined by the internal working group during the development of each annual implementation plan.

	Page 58, paragraph 4- I'd like to support the provision of a Special Control Area in the City's Local Planning Scheme.	
	Page 58- 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.	This text has not been included in the Draft LBS 2023-2043. It is noted that the City require planning approval to be obtained prior to removing "trees worthy of retention" under <i>Local Planning Policy 33- Tree Retention</i> , unless a valid exemption applies.
	Definitely need to update the Public Open Space Strategy (2018) to include better identification and recognition of biodiversity values in public open spaces across the City.	Noted. This is included as a specific action (Action 3.3) in the revised Draft LBS 2043-2043.
	Page 61, last paragraph- Remove Manager. Discussion was with Coordinator Natural Areas, Consultant and Environmental Team Staff.	Noted. This text was not included in the revised Draft LBS 2043-2043.
	Page 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.	Vegetation within Cambridge Reserve is mapped as a local natural area. Local Open Space (LOS) mapping has been added to the figures which distinguishes the LOS from future development land.
	Page 65, Section 5.2.2.2 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.	Engage is a key focus area of the Draft LBS 2023-2043, including both internal and external education/ capacity building regarding biodiversity. Communication with Council regarding the

	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.	implementation of a local planning policy for biodiversity on private land will be undertaken at the time the policy is developed and presented to Council for consideration/ adoption.
	Page 68- 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.	This text is not included in the revised Draft LBS 2023-2043, however, utilising friends groups/ volunteers as valuable resources in implementation of the strategy is listed as an action.
	Page 69, Action Plan Table- 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.	The Draft LBS 2023-2043 prioritises on ground surveys, prior to developing management plans. This is required to understand the site characteristics, threats and values requiring management, prior to developing a management plan.
	Page 69, Action Plan Table, Action 2.5- Fauna monitoring is usually a specialised job and therefore I suggest it should be outsourced to consultants where possible.	Noted.
	Page 69, Action Plan Table, Action 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.	The City's Parks and Environment Team will be represented in the working group responsible for developing the Annual Implementation Plans, including consideration of resources required to implement the LBS actions.
	Page 69, Action Plan Table, Action 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	Section 7.2 of the revised Draft LBS 2023-2043 (Part 2) outlines that a Monitoring and Evaluation Program will be established by the working group to track the

	the review of the 2008 LBS stating that little was done and progress was not monitored.	progress and relative success of the LBS actions and assess whether the City is meeting the goals and strategic objectives.
	Appendix C, Tables C-1 and C2- Suggest names of the reserves are included where possible, as well as their R-Code and LNA numbers.	The revised Draft LBS 2023-2043 (Part 2) includes the names of reserves in Appendix 4 and Appendix 5. R-Code and LNA numbers are not considered necessary to include in the LBS, however, this information is readily available for City staff/ the working group through the City's internal mapping system.
	Appendix C (E?) 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.	Noted. The <i>"Review of the 2008 Local Biodiversity Strategy Report"</i> has not been included in the revised LBS 2023-2043.
	Appendix F- 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.	Noted. This appendix has been revised, however much of this information is provided in Appendix 4 and 5 of the revised Draft LBS 2023-2043.
	Appendix G- Suggest removing this from the 2020 LBS and providing it as a separate document to avoid confusion and reduce 2020 document size.	Noted. Appendix G has been removed. This information will be communicated through the implementation of the strategy and through public communication material.
	There is no 'Conservation and Environment Team'. Please check terminology to accurately reflect staffing titles as required.	Noted. This term has not been used in the revised Draft LBS 2023-2043.

<p>5.</p>	<p>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.</p> <p>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%.</p>	<p>Noted.</p>
	<p>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.</p>	<p>As above, with regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>

	<p>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.</p>	<p>In addition to the Draft LBS 2023-2043, the City has also prepared a Draft Urban Forest Strategy 2023-2043 which seek to protect and enhance the City's tree canopy cover.</p>
	<p>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.</p>	<p>This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.</p>
<p>6.</p>	<p>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.</p>	<p>Regarding the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and</p>

	<p>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).</p>	<p>2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p> <p>It is noted that in many instances vegetation clearing occurs in areas/ cases where the City has no authority, for example for State infrastructure/ road upgrades.</p>
	<p>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.</p> <ul style="list-style-type: none"> • 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. 	<p>Noted. These objectives are captured by the goals, objectives and actions of the revised Draft LBS 2023-2043.</p>
	<p>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</p>	<p>This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.</p>

	the best interests of the community and the environment to do just that.	
7.	<p>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.</p> <p>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.</p> <p>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.</p>	This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.
8.	"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	<p>This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.</p> <p>The potential environmental impacts of the proposal to rezone Wattle Grove South are currently being assessed by the State Environmental Protection Agency.</p>

	<p>the best interests of the community and act immediately to prevent such rezoning of rural land within the City.</p> <p>To requote as per previous correspondence: 'Let us be the change so badly needed. Let us make a difference.'</p>	
9.	<p>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.</p>	<p>This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.</p>
10.	<p>Errata.</p> <p>(p.60). "vie" substitute "via".</p> <p>P. 63 amend "less then 5" to "less" than 5"</p> <p>p. 65 bottom of page. "including the an update" – delete "the".</p> <p>P. 68. Unfinishedsentence – "engaging the community in valuing ...?"</p> <p>P. 62 point 7 replace "site" with "sites".</p> <p>p. 67 last dot point, closeparentheses.</p> <p>Action Plan 5.4 KPI – replace "Shire" with "City".</p> <p>Appendix C Table C 2 Delete the second "to".</p> <p>Appendix E (bottom p. 9) Replace "list" with "lists".</p> <p>Ditto (p. 10) Replace "identify" with "identifies".</p>	<p>Noted. The revised Draft LBS 2023-2043 has resolved these errors.</p>
	<p>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</p>	<p>Noted.</p>

	<p>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.</p>	
	<p>INTRODUCTION <i>"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)."</i></p> <p>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.</p>	<p>Noted.</p>
	<p>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).</p>	<p>Noted.</p>
	<p>Introduction (cont'd)</p>	<p>Noted.</p>

	<p><i>“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”.</i></p> <p>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.</p>	<p>The LBS has been revised to include provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the LBS.</p> <p>Section 7.2 of the revised Draft LBS 2023-2043 (Part 2) outlines that a Monitoring and Evaluation Program will be established by the working group to track the progress and relative success of the LBS actions and assess whether the City is meeting the goals and strategic objectives.</p>
	<p><i>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 ...”</i></p> <p>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. “</p>	Noted.
	<p><i>“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”.</i></p>	Noted.

	<p>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.</p>	
	<p>1.1 BENEFITS OF CONSERVING BIODIVERSITY LOCALLY</p> <p><i>“The local community values the natural environment highly”.</i></p> <p>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).</p>	<p>Noted.</p>
	<p><i>“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.”</i></p> <p>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</p>	<p>Noted. The Draft LBS 2023-2043 includes “Engage” as a key focus area, supported by the following goal: <i>Actively engage with Aboriginal representatives to understand and integrate cultural knowledge into local biodiversity management. Engage with the community to strengthen the appreciation of biodiversity values, and encourage them to retain, protect and enhance biodiversity values on private land.</i></p> <p>The Draft LBS 2023-2043 includes the following strategic objective: <i>Aboriginal representatives are engaged and actively involved in managing biodiversity and promoting the cultural values of natural areas.</i></p>

	<p>officers and, it is hoped the City will take full advantage of the traditional knowledge of such staff, directly and indirectly.</p>	<p>The above goal and objectives are supported by specific actions.</p>
	<p><i>"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..."</i></p> <p>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.</p>	<p>Noted. The focus of the <i>Draft LBS 2023-2043</i> is on remnant native vegetation (local natural areas) and other native biodiversity values, rather than landscaped areas.</p>
	<p>1.2 LEGISLATION AND POLICY SUPPORTING BIODIVERSITY CONSERVATION</p> <p>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</p>	<p>Noted.</p>

	<p>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.</p>	
	<p><i>"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)."</i></p> <p>Both these extracts support an earlier NRPB 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.</p>	<p>The Draft LBS 2023-2043 includes a number of actions which will better incorporate biodiversity protection, management and enhancement into Local Planning Scheme 4 (in draft), as well as an action and to develop a local planning policy for biodiversity.</p> <p>KESAC provides advice on relevant existing strategies / polices to ensure that the environment is appropriately considered.</p>
	<p>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).</p>	<p>Noted. As above, the Draft LBS 2023-2043 includes a number of actions which will better incorporate biodiversity protection, management and enhancement into Local Planning Scheme 4 (in draft),</p>

	<p><i>"The City's Local Planning Scheme includes the following support for biodiversity conservation:"</i> (p.10).</p> <p>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.</p>	<p>as well as an action and to develop a local planning policy for biodiversity.</p>
	<p><i>"Opportunities for increasing provisions for biodiversity consideration and protection via the City's land use planning tools include:"</i> (p.11).</p> <p>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.</p>	<p>Noted.</p>
	<p>1.3 LOCAL BIODIVERSITY STRATEGY SCOPE</p> <p><i>"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."</i></p> <p>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</p>	<p>The term 'least cost' differs from 'cost effective' and is essentially a method of analysis. For example 'least-cost' modelling is used to determine ecological linkage pathways that provide the least resistance for fauna movement.</p> <p>A footnote has been added to the revised Draft LBS 2023-2043 for clarity.</p>

	should be implemented. This phrase should be deleted from the draft.	
	<p><i>"For the purposes of the City's 2020 Local Biodiversity Strategy, Local Natural Areas are defined as natural areas that exist."</i></p> <p>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 LNAS'").</p>	Noted. The term "City LNAS" has been removed from the LBS for simplicity.
	<p>2 BIODIVERSITY ASSETS</p> <p><i>"...native vegetation on the Swan Coastal Plain portion of the City being reduced to the critical threshold of 10% of its preclearing status...".</i> (p.15).</p> <p>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.</p>	Noted. The Draft LBS 2023-2043 prioritises the protection and management of LNAS with the highest natural area prioritisation score and those most at risk (i.e. low viability score). The natural area prioritisation score methodology considers the presence of poorly represented vegetation (i.e. threatened ecological communities).

	<p>2.1 VEGETATION, THREATENED AND PRIORITY ECOLOGICAL COMMUNITIES</p> <p><i>“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.”</i> (p. 16)</p> <p><i>“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.”</i> (ibid.)</p> <p>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.</p>	<p>Noted.</p>
	<p>Threatened Ecological Communities</p> <p><i>“...plant communities in Jarrah Forest are under threat from the impacts of dieback ... and high risk of altered fire regimes.”</i> (p. 18)</p> <p>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</p>	<p>Noted. The Draft LBS 2023-2043 includes the following actions which will address operational dieback procedures; Action 3.1, Action 3.9 and Action 3.6.</p> <p>The City currently map fuel ages across hazard reduction burns conducted (excludes private land), fuel loadings are then conducted once a reserve reaches an age greater than years and reserve are prioritised for burning accordingly.</p>

	<p>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.</p>	<p>Regarding burn intensity, the City are currently progressing the Local Environment Strategy Action to “determine ecological fire requirements and develop fire and biodiversity procedures for the management of City Reserves”.</p>
	<p><i>“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).</i></p> <p><i>“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].</i></p> <p>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.</p>	<p>Noted. The Draft LBS 2023-2043 includes actions to better protect biodiversity through the planning framework, under the <i>Planning and Development Act 2005</i>.</p>
	<p><i>“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:</i></p>	<p>Noted. A key focus area of the Draft LBS 2023-2043 is “Investigate”, which includes the following goal: <i>Investigate and actively pursue new resourcing (human, funding, and data) and research opportunities to enable</i></p>

	<ul style="list-style-type: none"> • 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). <p>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.</p>	<p><i>further investment and improvement in on-ground actions on public and private land to manage and protect local biodiversity.</i></p> <p>The Draft LBS 2023-2043 includes specific actions to assist in achieving the above goals.</p> <p>Further, Draft LBS 2023-2043 includes provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the LBS. A preliminary resourcing assessment has been undertaken for the implementation of the LBS.</p>
	<p>TABLE 5: THREATENED AND PRIORITY ECOLOGICAL COMMUNITIES MAPPED IN THE CITY OF KALAMUNDA (DBCA 2020)</p> <p>Note the discrepancies between the Commonwealth and State conservation status allotted to the communities. See also earlier comments on shortcomings of the relevant acts.</p>	<p>Noted. This has been resolved in the Draft LBS 2023-2043.</p>
	<p>2.2 CONSERVATION SIGNIFICANCE PLANTS - THREATENED AND PRIORITY FLORA</p> <p><i>"Nearly a quarter (48 reserves) of the natural area reserves managed by the City of Kalamunda retain threatened and priority plants." (p. 20)</i></p> <p><i>"This and other similar studies (Nge, F., 2019) demonstrate that focusing only on species listed as threatened or priority by legislation does not</i></p>	<p>Noted.</p>

	<p><i>adequately describe the conservation significance of natural areas.” (p. 21).</i></p> <p>These comments reinforce our earlier comments, stressing the need for assigning a high priority to the monitoring of all ecological communities within the City.</p>	
	<p><i>“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).</i></p> <p>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.</p>	<p>Noted. The City is aware of, and has a copy of “A jewel in the Crown of a Biodiversity Hotspot” by Hans Lambers. The City is also aware of the EPA’s advice <i>Environmental Values and Pressures for the Greater Brixton Street Wetlands on the Swan Coastal Plain.</i></p> <p>The City has drafted a local planning policy (LPP 34- Wetlands and Waterways) for the assessment, establishment and management of buffers/ foreshores to wetlands and waterways. This LPP is anticipated to be finalised and adopted in 2023. This LPP will assist with ensuring new development adjacent to wetlands and waterways are appropriately set back and managed.</p>
	<p>2.3 FUNGI</p> <p><i>“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.”</i></p>	<p>The Draft LBS 2023-2043 focusses on actions to protect, manage and enhance local natural areas, which naturally contain fungi/ habitat for fungi.</p>

	<p><i>"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."</i></p> <p><i>"Building the knowledge base on local fungi will improve the understanding of ecosystem health and inform future management."</i></p> <p>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?</p>	
	<p>2.4 CONSERVATION SIGNIFICANCE ANIMALS – THREATENED AND PRIORITY FAUNA</p> <p><i>"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).</i></p> <p><i>"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).</i></p> <p><i>"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.).</i></p>	<p>Noted. The Draft LBS 2023-2043 prioritises the protection and management of LNAs with the highest natural area prioritisation score and those most at risk (i.e. low viability score). The natural area prioritisation score methodology considers the presence of poorly represented vegetation (i.e. threatened ecological communities).</p> <p>The City has drafted a local planning policy (LPP 34- Wetlands and Waterways) for the assessment, establishment and management of buffers/ foreshores to wetlands and waterways. This LPP is anticipated to be finalised and adopted in 2023. This LPP will assist with ensuring new development adjacent to wetlands</p>

	<p>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 NRP. 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.</p>	<p>and waterways are appropriately set back and managed.</p>
	<p>2.4 (Sic) WETLANDS AND WATERWAYS. <i>"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 ..."</i> (p. 29).</p> <p>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.</p>	<p>As above, the City has drafted a local planning policy (LPP 34-Wetlands and Waterways) for the assessment, establishment and management of buffers/ foreshores to wetlands and waterways. This LPP is anticipated to be finalised and adopted in 2023. This LPP will assist with ensuring new development adjacent to wetlands and waterways are appropriately set back and managed.</p>
	<p><i>"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."</i> (Ibid.).</p> <p>With a drying climate, increases in temperature and extreme weather events and increasing pressures from development proposals, the long term species' environmental climate tolerance</p>	<p>This specific objective has not been included in the revised Draft LBS 2023-2043, however, a number of mapped geomorphic wetlands occur on City managed land and the protection status of these reserves is to be increased through changing the reserve purpose to include "conservation", or changing the local open space category to "Environmental Conservation".</p>

	<p>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.</p>	<p>Where wetlands occur on private land, new development will be subject to assessment against Draft LPP 34- Wetlands and Waterways, as well as State Planning Policy 2.9.</p>
	<p><i>"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).</i></p> <p>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.</p>	<p>Noted.</p>
	<p><i>"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).</i></p> <p>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.</p>	<p>Noted. As above, the City has drafted a local planning policy (LPP 34-Wetlands and Waterways) for the assessment, establishment and management of buffers/ foreshores to wetlands and waterways.</p>

	<p>3 THREATS TO BIODIVERSITY</p> <p>All the <i>“proposed additional responses”</i> to listed threats are welcome and are supported. NRPG comments concentrate on actions NRPG considers require improvement.</p>	<p>Noted.</p>
	<p><i>“Threat. Introduced plants (weeds)”</i> (p. 32).</p> <p>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.</p>	<p>The actions of the Draft LBS 2023-2043 include using on-ground information to ensure current, best-practice environmental management is determined and implemented for LNAs on City owned or managed land. The reserves prioritised for management are those with the highest natural area prioritisation score and those most at risk (i.e. low viability score).</p> <p>The LBS has been revised to include provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the LBS. A preliminary resourcing assessment has been undertaken for the implementation of the LBS.</p> <p>The Draft LBS 2023-2043 includes an action establishing a physical and online environmental hub including local biodiversity information, such as weed identification and control.</p> <p>The Department of Primary Industries and Regional Development's Agriculture and Food is responsible for</p>

		regulating pests and disease under the <i>Biosecurity and Agriculture Management Act 2007</i> .
	<p><i>"Threat. Feral animals preying on native animals and reducing habitat (loss of nesting hollows)" (p. 33).</i></p> <p>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.</p>	Noted.
	<p><i>"Threat. Land clearing, modification of watercourses, land fill and over-use of fertilisers" (p.34).</i></p> <p><i>"Participation in the Hills Catchment Management Program or other regional catchment management initiative" (Ibid.).</i></p> <p>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.</p>	Noted.
	<p><i>"Threat. Arson and lack of consideration of ecological community needs in timing of bushfire risk mitigation measures" (p. 35).</i></p> <ul style="list-style-type: none"> • <i>Use the local natural area prioritisation to inform land use planning, avoiding further subdivisions in high conservation value areas</i> • <i>Develop an adaptive weed control program to facilitate post-fire management of conservation areas</i> 	It is noted that the actions of the Draft LBS 2023-2043 have been revised, however, the LBS includes an action to develop a local planning policy for biodiversity which will require consideration of natural area prioritisation scoring and site-specific biodiversity information, for new development.

	<ul style="list-style-type: none"> • <i>Adopt an emergency wildlife care strategy to facilitate effective response to major bushfires</i> • <i>Set up a fire frequency and extent monitoring database</i> <p>Whilst all the proposed measures are necessary and are supported, it is essential all are implemented.</p> <p>Any proposals to use a planning tool preventing creation of subdivisions in “high conservation areas” should be encouraged.</p> <p>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.</p> <p>The recent Wooroloo fires highlighted the need for such a “wildlife care strategy”.</p> <p>The establishment of the “fire ...monitoring database” would provide staff and brigades with another tool with which to tackle planned mitigation measures and wildfires.</p>	<p>The City are currently progressing the <i>Local Environment Strategy</i> Action to “determine ecological fire requirements and develop fire and biodiversity procedures for the management of City Reserves”.</p>
	<p><i>“Threat. Introduced plant diseases” (Ibid.).</i></p> <ul style="list-style-type: none"> • <i>Adopt dieback hygiene procedures for all City operations e.g. roadworks, infrastructure development and maintenance</i> <p>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.</p>	<p>Noted. The Draft LBS 2023-2043 includes the following actions which will address operational dieback procedures; Action 3.1, Action 3.9 and Action 3.6.</p> <p>The City will consider communicating these procedures with third parties, where applicable.</p>

<p>4. LOCAL BIODIVERSITY CONSERVATION VISION AND OBJECTIVES. <i>"In implementing the Local Biodiversity Strategy, the City of Kalamunda seeks to achieve the following objectives:</i></p> <p><i>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;</i></p> <p><i>4.2. To appropriately manage local natural areas to reduce threats, considering the identified local biodiversity conservation priorities;</i></p> <p><i>4.3. To increase the viability and resilience of natural areas by establishing buffers and ecological linkages; considering the impacts of climate change;</i></p> <p><i>4.4. To integrate biodiversity considerations across all areas of City's business and operations;</i></p> <p><i>4.5. To achieve long term community engagement in biodiversity management</i></p> <p>These are all worthy objectives, enthusiastically supported by NRPG. 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 NRPG 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.</p>	<p>While the Draft LBS 2023-2043 includes revised goals and objectives, the objectives listed by NRPG are effectively covered by the revised goals.</p> <p>The LBS has been revised to include provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the LBS. A preliminary resourcing assessment has been undertaken for the implementation of the LBS.</p> <p>Section 7.2 of the revised Draft LBS 2023-2043 (Part 2) outlines that a Monitoring and Evaluation Program will be established by the working group to track the progress and relative success of the LBS actions and assess whether the City is meeting the goals and strategic objectives.</p>
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	<p>5. IMPLEMENTATION. 5.1.1 PRIORITISATION OF LOCAL NATURAL AREAS <i>"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."</i> (p. 38)</p> <p>NRPG 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.</p>	<p>The Draft LBS 2023-2043 proposes to change the "purpose" of 500 ha of City Reserves to include "conservation", under the <i>Land Administration Act 1997</i>.</p> <p>Further, the City are proposing a Local Open Space category for "Environmental Conservation" in Local Planning Scheme 4, which is currently in draft.</p> <p>These measures will provide greater protection for vegetation/ biodiversity within City managed reserves and Local Open Space.</p>
	<p><i>"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."</i> (p. 42) <i>"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."</i> (Ibid.)</p> <p>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</p>	<p>Noted. For private land, the LBS includes an action to develop a local planning policy for biodiversity which will require consideration of natural area prioritisation scoring and site-specific biodiversity information, for new development.</p> <p>For City reserves and local open space, the LBS includes actions to undertake site specific surveys and develop management plans based on this information.</p>

	<p>prioritisation process will need to pass through several steps before the final priorities are agreed.</p>	
	<p>5.1.2 ECOLOGICAL LINKAGES AND VEGETATION CONNECTIVITY <i>"...the effects of urbanisation on long term viability of plant communities is not well- understood."</i> (p. 44).</p> <p>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.</p>	<p>The Draft LBS 2023-2043 includes "Investigate" as a key focus area, with the following goal; <i>Investigate and actively pursue new resourcing (human, funding, and data) and research opportunities to enable further investment and improvement in on-ground actions on public and private land to manage and protect local biodiversity.</i></p>
	<p><i>"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)"</i> (p. 44). <i>"Establishment and maintenance of effective ecological linkages address many of the above recommendations."</i> (Ibid.)</p> <p>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</p>	<p>Noted. While the Draft LBS 2023-2043 has been updated, "Link" is a key focus area of the strategy, supported by the following goal: <i>Maintain and improve local and regional ecological linkages to facilitate the movement of flora and fauna species and the flow of genetics throughout the landscape.</i></p> <p>The above goal is supported by strategic objectives and specific actions.</p>

	responses" and their implementation within this Strategy would be welcomed by NRPG.	
	<p><i>"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).</i></p> <p>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.</p>	Noted. Ecological linkages are shown in Figure 4 of the revised Draft LBS 2023-2043. Waterways have not been included on the figure for visual simplicity. It is noted that in many cases ecological linkages follow the route of watercourses.
	<p><i>"Include areas with high Connectivity Reach values and with least cost opportunities for retention to act as stepping-stones within linkages." (p. 46).</i></p> <p>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.</p>	<p>The term 'least cost' differs from 'cost effective' and is essentially a method of analysis. For example 'least-cost' modelling is used to determine ecological linkage pathways that provide the least resistance for fauna movement.</p> <p>A footnote has been added to the revised Draft LBS 2023-2043 for clarity.</p>
	<p>5.2 TOWARDS LOCAL BIODIVERSITY CONSERVATION OBJECTIVES</p> <p><i>"To allow monitoring the effectiveness of the proposed implementation mechanisms and the levels of implementation, adoption of targets</i></p>	The revised Draft LBS 2023-2043 includes a target to increase the conservation protection status of 500 ha land, containing approximately 270 ha of native

	<p><i>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."</i> (p. 47).</p> <p>TABLE 11: LOCAL BIODIVERSITY CONSERVATION TARGETS The 'Objectives' and, 'Targets to be achieved by 2031' are all supported by NRPG, 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?</p>	<p>vegetation by changing the reserve "purpose" to include "conservation", under the <i>Land Administration Act 1997</i>.</p> <p>The City has undertaken a desktop analysis of City reserves containing LNAs with the potential for the environmental protection status to be increased, and this target is considered achievable.</p> <p>Further, the City are proposing a Local Open Space category for "Environmental Conservation" in Local Planning Scheme 4 (currently in draft), which will provide greater protection for LNAs within Local Open Space.</p> <p>Additional, specific, measurable criteria for the actions will be determined by the internal working group during the development of each annual implementation plan.</p>
	<p><i>Objective. "To establish biodiversity consideration as standard across all areas for biodiversity conservation"</i> <i>"4.1. Local Biodiversity Strategy objectives are integrated into the City's land use planning tools"</i> <i>How? "Integration into City's Local Planning Strategy, Local Planning Scheme and adoption of Local Planning Policies -See Section 5.2.1"</i> <i>"4.2 All staff use the City's environmental checklist procedures prior project planning and development"</i></p>	<p>The goals and objectives of the revised Draft LBS 2023-2043 will be incorporated into the <i>City's Local Planning Strategy</i> (in draft).</p>

	<p>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.</p>	
	<p>5.2.1 OPPORTUNITIES TO INCREASE PROTECTION AND RETENTION OF LOCAL NATURAL AREAS <i>“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).”</i></p> <p>This reinforces NRPB criticism, in its 2018 submission , of the format of this Strategy.</p>	<p>Noted. The Draft LBS 2023-2043 proposes to change the “purpose” of 500 ha of City Reserves to include “conservation”, under the <i>Land Administration Act 1997</i>.</p> <p>It is noted that the <i>City’s Public Open Space Strategy (2018)</i> only lists Public Open Space which serve primarily a nature space purpose as a “Biodiversity Asset”. This does not suggest that biodiversity present within other public open space areas is not important or worthy of conservation. The protection status of biodiversity within other local open space areas will be afforded greater protection through the proposed “Environmental Conservation” category which will be included in the City’s Local Planning Scheme 4 (currently in draft).</p>
	<p><i>“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</i></p>	<p>Noted. See City response to previous comment.</p>

	<p><i>State Public Parklands Strategy.</i>” A totally unsuitable framework for any environmental document. (Extract from NRPG submission on POS).</p> <p><i>“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”</i> (p.52).</p> <p><i>“This MRS land use classification alone is not considered adequate at providing formal protection for native vegetation.”</i> (Ibid.).</p> <p>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.</p>	
	<p><i>“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.”</i> (p. 52)</p> <p>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.</p>	<p>Noted. The Draft LBS 2023-2043 can only address areas within the City’s sphere of influence.</p>

	<p>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.</p>	<p>Noted. The Draft LBS 2023-2043 includes a revised list of actions, however, key actions of the Draft LBS 2020 have been retained and actions which are duplicate actions with other City strategies have been removed to provide a succinct document.</p>
	<p>5.2.1.2 INTEGRATING BIODIVERSITY CONSERVATION OBJECTIVES INTO LAND USE PLANNING <i>“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.”</i> (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.</p>	<p>Noted. The City are proposing a Local Open Space category for “Environmental Conservation” in Local Planning Scheme 4, which is currently in draft. This is included as an action in the Draft LBS 2023-2043.</p>
	<p><i>“Update of the City’s Public Open Space Strategy (2018)”</i> (p. 60). <i>“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.”</i> (p.61).</p>	<p>Noted. The revised Draft LBS 2023-2043 includes the following action (Action 3.3): <i>Revise the City’s Public Open Space Strategy including:</i> 1. updating the “Biodiversity Asset” mapping to reflect the presence of priority LNAs.</p>

	<p>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: <i>"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."</i> (NRPG submission).</p>	<p>2. <i>revising Action 1.1.6, or include an additional action, that requires replacing all native vegetation removed within Public Open Space at a minimum ratio of 2:1 either within the same reserve or another City-managed reserve, within 12 months of the vegetation being removed. The current Public Open Space Strategy Action 1.1.6 applies only to 'significant trees'.</i></p>
	<p>5.2.2.1 CITY MANAGED LOCAL NATURAL AREAS <i>"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:</i></p> <ul style="list-style-type: none"> • <i>Develop, adopt and implement a bushland management master plan for all City managed Local Natural Areas;</i> • <i>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."</i> (p.61). <p>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.</p>	<p>It is noted that the revised Draft LBS 2023-2043 does not include a bushland management master plan for all City managed Local Natural Areas, rather will include individual reserve management plans based on site-specific data.</p>

	<p><i>"However, road reserves are mapped and classified according to roadside conservation committee protocols and can act as corridors and buffers." (p.62).</i></p> <p>More attention is needed to the maintenance of City road reserves. Their value as potential <i>"corridors and buffers"</i> 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).</p>	<p>Noted. The City's Parks and Environment Team, responsible for verge maintenance will be represented in the working group responsible for developing the Annual Implementation Plans, including consideration of resources required to implement the LBS actions.</p>
	<p>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.</p>	<p>Since the time that this submission was received the City have adopted Local Planning Policy 33- Tree Retention for implementation and have adopted Draft Local Planning Policy 34- Wetlands and Waterways for advertising.</p> <p>Further the City has employed two fulltime Planning Compliance Officers who have successfully prosecuted a number of private landowners for unauthorised vegetation removal under the <i>Planning and Development Act 2005</i>.</p> <p>The LBS 2023 includes and action to develop a local planning policy for biodiversity protection and</p>

		management. The LBS 2023 also includes an action to incorporate biodiversity provisions into the City's Local Planning Scheme 4 (in draft).
	<p><i>"It is recommended that the City..."</i> (pp.65-66).</p> <p>All these proposals are supported and welcomed by NRPG. 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.</p>	Noted.
	<p><i>"In addition to the information resources the City already provides, it is recommended that the following additional information is developed:</i></p> <ul style="list-style-type: none"> • <i>Responsible cat ownership</i>" (p.66). <p>NRPG 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.</p>	Since the time that this submission was received, Council have adopted The Cat Local Law 2023 which establishes cat exclusion areas in biodiverse areas.
	5.2.3 INTEGRATION OF BIODIVERSITY CONSIDERATION INTO LOCAL GOVERNMENT BUSINESS	Noted. See City's response to previous comment.

	See "Environment in all Policies" comment on Section 1.2 and throughout submission.	
	<p>5.2.4 COMMUNITY ENGAGEMENT</p> <p><i>"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:"</i> (p. 67).</p> <p>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.</p> <p><i>"Referring to the findings of the Local Biodiversity Strategy when providing comments on subdivision and scheme amendment proposals."</i></p> <p><i>"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)."</i></p> <p><i>"Continued support to the volunteer community groups"</i> (p. 68).</p> <p>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'</p>	<p>Noted. Engage is a key focus area of the revised Draft LBS 2023-2043.</p> <p>New proposals will be required to consider biodiversity in accordance with the proposed Local Planning Scheme 4 provisions, as well as the proposed Local Planning Policy for biodiversity.</p> <p>It is noted that the following has not been included in the revised Draft LBS 2023-2043, as this is not a key action required to protect/ manage biodiversity</p> <p><i>"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)."</i></p> <p>Utilising friends groups/ volunteers as valuable resources in implementation of the strategy is listed as an action and the City will continue to support the work of friends groups and exercise the City's required duty of care.</p>

	<p>6. ACTION PLAN</p> <p>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.</p>	<p>Priorities have not been allocated in the Draft LBS 2023-2043, rather, the prioritisation of actions will be determined by the working group through the development of an Annual Implementation Plan.</p> <p>Additionally, the Draft LBS 2023-2043 has a 20 year implementation timeframe with four-yearly review periods which will capture any improvements necessary, as identified in annual monitoring reports and as determined by the working group.</p>
	<p>Action. <i>“5.4 Develop a monitoring and reporting schedule”</i> KPI. <i>“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”.</i></p> <p>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.</p>	<p>The Draft LBS 2023-2043 includes a framework for the:</p> <ul style="list-style-type: none"> • Establishment of a working group • Development of an Annual Implementation Plan (prioritise actions, determine KPIs, resources) • Development of a Monitoring and Evaluation Program to track the progress of actions, success against target, goals and objectives. • Annual reporting • Four yearly review of the LBS, for continual improvement.
	<p>APPENDIX A: VEGETATION STATISTICS</p> <p><i>“6. Further discussion was undertaken with City Officers and consideration of current planning processes, future plans, revegetation</i></p>	<p>The reference to offsets in the Draft LBS 2023-2043 relates to a potential source of funding for environmental protection, management and rehabilitation of the City’s local biodiversity, generated</p>

	<p><i>programs, potential future offset sites etc was taken into consideration in the final delineation of LNAs". (p. 2).</i></p> <p>The phrase "offset sites" always triggers a warning with NRP. 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.</p>	<p>from third party offsets under the <i>Environmental Protection Act 1986</i> or <i>Environment Protection Biodiversity Conservation Act 1999</i>. It is noted that the City does not administer this legislation, however, could benefit local biodiversity by utilising these funds.</p> <p>It is noted that offsets do not always result in a net loss of biodiversity, particularly where the offset includes rehabilitation, which is a key focus area, goal and strategic objective of the Draft LBS 2023-2043.</p>
	<p>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 NRP (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 "<i>The reserves in good or better condition that should be protected further by altering the reserve purpose</i>". (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.</p>	<p>Noted. Reserve 29013 has been included in Appendix 5, for its protection to be increased through a change of reserve purpose to include "conservation" under the <i>Land Administration Act 1997</i>.</p>
	<p>APPENDIX E: 2008 KALAMUNDA LOCAL BIODIVERSITY STRATEGY REVIEW REPORT</p>	<p>The review of the City's performance presented in Appendix E of the advertised LBS 2020 did not accurately capture the City's performance. The review</p>

	<p><i>"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:"</i></p> <p>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".</p>	<p>quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. The datasets used to determine this figure were DPIRD "native vegetation extent" data from 2005 and 2020. The methodology for mapping native vegetation extent was modified between these two datasets and resulted in a significant change to the mapped area of native vegetation, where there was no physical vegetation loss. The quoted vegetation loss was a result of the two datasets being erroneously used for comparative purposes and not adequately interrogated. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>Separately, the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and</p>
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		<p>2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p> <p>The City recognises that there is an opportunity to significantly improve the protection of natural areas and commits to striving to protect an additional 500ha of land, containing approximately 270ha of vegetation.</p> <p>It is noted that Appendix E has not been included in the revised Draft LBS 2023-2043.</p>
	<p>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.</p>	<p>Noted. The revised Draft LBS 2023-2043 includes a list of achievements relating to local biodiversity since the adoption of the 2008 LBS. This list is in Section 1.6 of the Part 2 report.</p>
	<p>Ecological Linkages (p.10). <i>“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).</i></p>	<p>Noted. Although there is no intention for the City to amend the ELUPS, the “Green Links Masterplan” will consider ecological linkages.</p>

	<p>Despite the importance of considering “residents health and wellbeing” the ELUP Strategy should be amended to refer to the importance of ecological linkages.</p>	
	<p>2.2 REPRESENTATIONAL TARGETS</p> <p><i>“Since the adoption of the 2008 LBS, vegetation representative of the Forrestfield vegetation complex declined (locally and regionally).”</i> (p. 15).</p> <p><i>“• Local protection target of at least 15 ha of Forrestfield vegetation complex protected has not been achieved yet;”</i> (p. 16).</p> <p><i>“• Since the adoption of the 2008 LBS, vegetation representative of the Southern River vegetation complex declined (locally and regionally).</i></p> <ul style="list-style-type: none"> <i>• Local protection target of at least 7 ha has not been achieved yet.</i> <i>• 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.</i> <i>• No increase in formal protection achieved as a result of LBS implementation.”</i> (p. 17). <p><i>“• Since the adoption of the 2008 LBS, vegetation representative of the Yarragil 1 vegetation complex declined locally.</i></p> <ul style="list-style-type: none"> <i>• No increase in formal protection of Yarragil 1 has been achieved as a result of LBS implementation.(p. 18).</i> <p>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.</p>	<p>The review of vegetation extent change over time was inaccurate and was determined as a result of comparing spatial datasets that were not comparable. The datasets used to determine this figure were DPIRD “native vegetation extent” data from 2005 and 2020. The methodology for mapping native vegetation extent was modified between these two datasets and resulted in a significant change to the mapped area of native vegetation, where there was no physical vegetation loss. For example, non-native plantations were mapped by DPIRD as native vegetation in their earlier dataset and then removed from the dataset as it was refined to only capture remnant native vegetation. When looking at data figures, this appears as a vegetation loss when there has been no physical loss of native vegetation.</p> <p>There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p>

<p>3 BIODIVERSITY CONSERVATION ACTIONS FOR CONSERVATION</p> <p>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.</p> <p>Action. <i>"Improve the protection and management of local reserves by changing vesting purpose..."</i></p> <p>Status. <i>"Change of vesting purpose of reserves listed in the 2008 LBS was not implemented."</i></p> <p>Action. <i>"Forming a reserves management committee,"</i></p> <p>Status. <i>"No reserves management committee has been established."</i></p> <p>Even after twelve years!</p> <p>Action. <i>"Developing a Reserves Masterplan"</i></p> <p>Status. <i>"The City is in the process of developing a process for prioritising reserve management."</i> Twelve years is too long an interval for this action to be completed.</p> <p>Action. <i>"Protecting natural areas in public open space contributions ... full ecological assessments should be conducted prior to structure planning"</i></p> <p>Status. <i>"There is no systematic process set up to monitor whether vegetation is protected in all new areas being subdivided or developed. (p.19).</i></p> <p>Action. <i>"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."</i></p>	<p>The review of the City's performance presented in Appendix E of the advertised LBS 2020 did not accurately capture the City's performance. The review quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>The City recognises that there is an opportunity to significantly improve the protection of natural areas and commits to striving to protect an additional 500ha of land, containing approximately 270ha of vegetation.</p> <p>The Draft LBS 2023-2043 has been revised to include provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the Draft LBS 2023-2043. A preliminary resourcing assessment has been undertaken for the implementation of the Draft LBS 2023-2043.</p>
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	<p>Status. <i>"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."</i> (p. 20).</p>	
	<p>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. <i>"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</i> (City of Kalamunda, 2019)." (Section 1.1 p. 6).</p> <p>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.</p>	<p>The Nature Fund Proposal is currently undergoing a second phase of public consultation. Details are available at the following link: Nature Fund Proposal - Phase 2 Public Comment Engage Kalamunda.</p>

	<p>Action. <i>"Development of the Shire's Environmental Services including: • Environmental Reserves Officer • Environmental Planner"</i> Status. <i>"Briefly, a role of Environmental Planner was created but not continued."</i></p> <p>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.</p>	<p>The City employed a fulltime Environmental Planner in 2021 and this staff member is still currently employed by the City.</p>
	<p>Action. <i>"Update weed strategy"</i> Status. <i>"The City's Weed Control Strategy (2002) is yet to be updated."</i> Action. <i>"Review of Wildlife Corridors Strategy"</i> Status. <i>"Review of the Wildlife Corridors will be part of the Local Biodiversity Strategy update."</i> (p. 21).</p> <p>These updates and reviews are long overdue. The <i>Wildlife Corridor Strategy</i> for example, dates back to October 1998.</p>	<p>The City's <i>Kalamunda Clean and Green Local Environment Strategy 2019 - 2029</i> includes the following action; <i>Review and update the Shire of Kalamunda Weed Control Strategy 2002.</i></p> <p>The Draft LBS 2023-2043 includes "Link" as a key focus area, supported by the following goal; <i>Maintain and improve local and regional ecological linkages that allow flora and fauna species movement and the flow of genetics throughout the landscape.</i></p> <p>The above goal is supported by strategic objectives and actions which build on the previous <i>Wildlife Corridor Strategy</i>.</p>

	<p>Action. <i>"Review and update the LBS to ensure it remains up to date and any new mechanisms can be implemented."</i></p> <p>Status. <i>"No systematic reviews have been undertaken since the adoption of the Local Biodiversity Strategy in 2008."</i></p> <p>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.</p>	<p>As above, the Draft LBS 2023-2043 includes a framework for the:</p> <ul style="list-style-type: none"> • Establishment of a working group • Development of an Annual Implementation Plan (prioritise actions, determine KPIs, resources) • Development of a Monitoring and Evaluation Program to track the progress of actions, success against target, goals and objectives. • Annual reporting • Four yearly review of the LBS, for continual improvement.
	<p>APPENDIX F: CITY OF KALAMUNDA RESERVES PRIORITISATION Table. (p. 25)</p> <p>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).</p>	<p>This list of reserve names in the Draft LBS 2023-2043 includes unofficial names. The City of Kalamunda is undertaking a review of Public Open Space naming throughout the local government district, having regard to the POS classification under the POS Strategy, the City of Kalamunda Governance Policy 19 - Names of Parks, Reserves, Streets and Infrastructure, and Landgate's Policies and Standards for Geographical Naming in Western Australia. Naming or potential renaming of POS areas will be undertaken in phases or as individual actions and community feedback will be sought where appropriate.</p>
	<p>Conclusion.</p> <p>Appendix E is a most damning section of this Strategy. The environmental staff and those engaged from the community who</p>	<p>As above, the review of the City's performance presented in Appendix E of the advertised LBS 2020 did not accurately capture the City's performance. The</p>

<p>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.</p> <p>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.</p> <p><i>“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).</i></p> <p>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.</p>	<p>review quoted vegetation loss of 630 ha which is inaccurate and was determined as a result of comparing spatial datasets that were not comparable. The datasets used to determine this figure were DPIRD “native vegetation extent” data from 2005 and 2020. The methodology for mapping native vegetation extent was modified between these two datasets and resulted in a significant change to the mapped area of native vegetation, where there was no physical vegetation loss. The quoted vegetation loss was a result of the two datasets being erroneously used for comparative purposes and not adequately interrogated. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>The revised Draft LBS 2023-2043 includes a target to increase the conservation protection status of 500 ha land, containing approximately 270 ha of native vegetation. This is a significant improvement on the protection of 2.2 ha of LNAs reported in the LBS 2020.</p> <p>The revised Draft LBS 2023-2043 includes framework for the:</p> <ul style="list-style-type: none"> • Establishment of a working group • Development of an Annual Implementation Plan (prioritise actions, determine KPIs, resources)
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		<ul style="list-style-type: none"> • Development of a Monitoring and Evaluation Program to track the progress of actions, success against target, goals and objectives. • Annual reporting • Four yearly review of the LBS, for continual improvement.
	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Noted.</p>

11.	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 Councillors to act in our interests.	Noted.
12.	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.	<p>This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.</p> <p>The potential environmental impacts of the proposal to rezone Wattle Grove South are currently being assessed by the State Environmental Protection Agency.</p>
13.	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.	<p>This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.</p> <p>The potential environmental impacts of the proposal to rezone Wattle Grove South are currently being assessed by the State Environmental Protection Agency.</p>
		The review of the City's performance presented in Appendix E of the advertised LBS 2020 quoted

	<p>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.</p> <p>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.</p> <p>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.</p>	<p>vegetation loss of 630 ha which is inaccurate. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>
14.	<p>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.</p> <p>I remember the attractive flora which grew on the road from Maida Vale to High Wycombe, not much sign of it now.</p> <p>My present property is bordered by Poison Gully. When first here we often had Rainbow Bee-eaters and Sacred Kingfishers flying</p>	Noted.

	<p>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.</p> <p>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 threatened <i>Conospermum undulatum</i> and the northernmost record of Priority 1 <i>Thelymitra magnifica</i>.</p> <p>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 <i>Hakea trifurcata</i>.</p> <p>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).</p>	
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	<p>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 to busy to help.</p>	
	<p>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”.</p> <p>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.</p> <p>This is why I think that the involvement and education of residents in environmentally sensitive areas is vitally important.</p> <p>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.</p>	<p>The Draft LBS 2023-2043 includes “Engage” as a focus area, supported by the following goal; <i>Actively engage with Aboriginal representatives to understand and integrate cultural knowledge into local biodiversity management. Engage with the community to strengthen the appreciation of biodiversity values, and encourage them to retain, protect and enhance biodiversity values on private land.</i></p> <p>There have been some modifications made to the strategy since it was publicly advertised, however the goals, strategic objectives and many of the actions remain the same or achieve the same intent as the Draft LBS 2020.</p>
<p>15.</p>	<p>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</p>	<p>This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City’s LNAs.</p>

	<p>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.</p> <p>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.</p>	<p>The potential environmental impacts of the proposal to rezone Wattle Grove South are currently being assessed by the State Environmental Protection Agency.</p> <p>The review of the City's performance presented in Appendix E of the advertised LBS 2020 quoted vegetation loss of 630 ha which is inaccurate. There is currently no dataset that can accurately determine the extent of vegetation loss/ gain, however the vegetation loss over the period 2005 to 2020 is expected to be significantly less than 630 ha.</p> <p>With regard to the 4% loss of green cover across the City, outlined in the report published by Greener Spaces Better Places 2020, the report specifically acknowledges the significant effect of bushfire in reducing green cover.</p> <p>A review of State government spatial data including records of fire events (prescribed burns and bushfire) which were captured on departmental-managed land, and where available non-department managed land shows that over 5,300 ha or 16.4% of the City's total land area was affected by bushfire between 2016 and 2020 (period of the RMIT study). This data shows the significant effect of bushfire on green cover loss.</p>
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16.	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 .	This statement is not correct, the LBS 2020 identifies a number of actions to increase the protection of the City's LNAs.
17.	Overall, the submitter 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.	Noted.
	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.	Noted.

	<p>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.</p>	
	<p>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 WSWA supports the concept of a Biodiversity Strategy and is pleased the City of Kalamunda has started the reinstituted process and reviewed its earlier Strategy. However, the current draft document is not easy to understand. It is not presented in a way</p>	<p>To ensure effective implementation, the Draft LBS 2023-2043 includes provision for a working group to develop an Annual Implementation Action Plan which will identify and quantify resources needed (both appropriately skilled human resources and financial resources) to implement the Draft LBS 2023-2043. A preliminary resourcing assessment has been undertaken for the implementation of the Draft LBS 2023-2043 A key focus area of the Draft LBS 2023-2043 is "Investigate", which includes the following goal: <i>Investigate and actively pursue new resourcing (human, funding, and data) and research opportunities to enable further investment and improvement in on-ground actions on public and private land to manage and protect local biodiversity.</i> The Draft LBS 2023-2043 includes "Link" as a key focus area, supported by the following goal; <i>Maintain and improve local and regional ecological linkages that allow flora and fauna species movement and the flow of genetics throughout the landscape.</i></p>

	<p>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.</p>	<p>The above goal is supported by strategic objectives and actions which build on the previous <i>Wildlife Corridor Strategy</i>.</p> <p>It is noted that the Draft LBS 2023-2043 includes measures to “conserve the natural environment” and contribute toward “sensitive planning of the built environment, which were focus areas of the <i>District Conservation Strategy 1995</i> (DCS). Other aspects of the DCS are addressed through City’s Waste Plan and Climate Change Action Plan.</p>
	<p>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.</p>	<p>The Draft LBS 2023-2043 includes revised figures which are higher quality than those advertised in the Draft LBS 2020. The Draft LBS 2023-2043 includes an action (5.5) to establish a physical and online environmental hub to ensure that biodiversity information and management advice is publicly accessible.</p>
	<p>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.</p>	<p>The Draft LBS 2023-2043 includes a high-level overview of biodiversity across the City based on broad information and government data records. It is acknowledged that more detailed information is available for specific locations. Where available, the City will include this information in it’s internal, central environmental database (to be established under Action 2.2), to inform decision making. Additional, ecological studies are also proposed to ensure that the</p>

		City has recent, site-specific data to inform management of the City's reserves/ Local Open Space.
	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.	Noted.
	<p>Biodiversity Strategy actions required</p> <p>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.</p> <p>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.</p>	Noted.
	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.	Noted.

	<p>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.</p> <p>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.</p>	<p>The Draft LBS 2023-2043 includes "Link" as a key focus area, supported by the following goal; <i>Maintain and improve local and regional ecological linkages that allow flora and fauna species movement and the flow of genetics throughout the landscape.</i></p> <p>The above goal is supported by strategic objectives and actions which build on the previous <i>Wildlife Corridor Strategy</i>.</p> <p>The Draft LBS 2023-2043 seeks to increase the protection of many of the City's reserves and local open space containing biodiversity value through including "conservation" as the reserve purpose under the <i>Land Administration Act 1997</i>, and through introducing and applying an Environmental Conservation Local Open Space category in Local Planning Scheme 4.</p>
	<p>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</p>	<p>The presence of conservation significant values has been considered in determining the "natural area prioritisation score" of the Draft LBS 2023-2043.</p> <p>Threatened flora and ecological communities are considered in the planning process and are also protected and regulated under the <i>Biodiversity Conservation Act 2016</i>, administered by the Department of Biodiversity, Conservation and Attractions.</p>

	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 City's <i>Kalamunda Clean and Green Local Environment Strategy 2019 - 2029</i> includes the following action; <i>Review and update the Shire of Kalamunda Weed Control Strategy 2002.</i>
	The submitter recommends that tree lopping of hollow trees containing bat colonies should be less enthusiastic.	It is unclear how this comment relates to the LBS.
	» Other issues that the submitter 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 Draft LBS 2023-2043 includes the following target; <i>increase the conservation protection status of 500ha land, containing approximately 270ha of native vegetation.</i>
	» the viability and resilience of natural areas with buffers and ecological linkages	The Draft LBS 2023-2043 includes the following goals relating to this comment: 1. Manage and enhance: <i>Manage, enhance, and rehabilitate LNAs and other biodiversity values on City-managed land to improve the quality and quantity of biodiversity values.</i> 2. Link: <i>Maintain and improve local and regional ecological linkages that allow flora and fauna</i>

		<p><i>species movement and the flow of genetics throughout the landscape.</i></p> <p>The above goals are supported by strategic objectives and actions.</p>
	<ul style="list-style-type: none"> » long term community engagement in biodiversity management » recognition and preservation of natural bush areas » retention of natural vegetation by private landholders 	<p>The Draft LBS 2023-2043 includes “Engage” as a focus area, supported by the following goal; <i>Actively engage with Aboriginal representatives to understand and integrate cultural knowledge into local biodiversity management. Engage with the community to strengthen the appreciation of biodiversity values, and encourage them to retain, protect and enhance biodiversity values on private land.</i></p>
	<ul style="list-style-type: none"> » restoration of degraded remnant native vegetation 	<p>As above, the Draft LBS 2023-2043 includes the following goal; Manage and enhance- <i>Manage, enhance, and rehabilitate LNAs and other biodiversity values on City-managed land to improve the quality and quantity of biodiversity values.</i></p>
	<ul style="list-style-type: none"> » use of local provenance plants for planting, climate-change modified 	<p>Any local natural area rehabilitation programs facilitated by the City will use local native species. Community education and planting programs will also utilise native species, for example, the City’s Plants For Residents program. Where necessary, the City will use species which are adaptive/ tolerant to climate change.</p>

		<p>The Draft LBS 2023-2043 includes the following action: <i>Undertake a climate risk assessment to identify the impact of climate change on keystone species and natural areas within the City, to inform a climate change adaptation strategy. This will include the development of thresholds for unacceptable change in the condition of LNAs managed by the City, to inform management actions in the Greening Masterplan.</i></p>
	<ul style="list-style-type: none"> » 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 	<p>The Draft LBS 2023-2043 identifies dieback as a threat to biodiversity and includes the following actions which will address operational dieback procedures; Action 3.1, Action 3.9 and Action 3.6.</p> <p>The Draft LBS 2023-2043 identifies weeds as a threat to biodiversity and includes Action 5.5 relating to community education regarding weed identification and control. The City's <i>Kalamunda Clean and Green Local Environment Strategy 2019 - 2029</i> includes the following action; Review and update the <i>Shire of Kalamunda Weed Control Strategy 2002</i>.</p> <p>It is understood that myrtle rust has only been detected in northern Western Australia, on an isolated property.</p>
	<ul style="list-style-type: none"> » roadworks such as road widening for purported safety reasons 	<p>The Draft LBS 2023-2043 identifies land clearing, degradation, and habitat fragmentation as a threat to biodiversity. The Draft LBS 2023-2043 includes the</p>

		<p>following action (1.4) relating to City projects (such as road upgrades); <i>Establish an operational framework within City departments to maximise retaining and protecting biodiversity in the planning and implementation of City projects, comprising a checklist and internal guideline covering due diligence, project planning/design, project implementation, and operation.</i></p>
	<p>» 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.</p>	<p>The City are currently progressing the <i>Local Environment Strategy</i> Action to “determine ecological fire requirements and develop fire and biodiversity procedures for the management of City Reserves”. The relevant City Officers have been notified of the WSWA Position Statement on Prescribed Burning and may obtain a copy to inform the above action.</p>
	<p>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</p>	<p>The term ‘least cost’ differs from ‘cost effective’ and is essentially a method of analysis. For example ‘least-cost’ modelling is used to determine ecological linkage pathways that provide the least resistance for fauna movement.</p> <p>A footnote has been added to the revised Draft LBS 2023-2043 for clarity.</p>

	draft Biodiversity Strategy are commendable. We encourage the City to undertake what is recommended and proposed.	
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