

Parliamentary inquiry into environmental infrastructure for growing populations

Submission by the Victorian National Parks Association

28/09/2020

Thank you for inviting submissions to this inquiry into the current and future arrangements to secure environmental infrastructure, particularly parks and open space, for a growing population in Melbourne and across regional centres.

We hope that this inquiry will help to support better environmental urban planning and help to inform the improvement of the quality and accessibility of nature and open space for the health and enjoyment of all Victorians.

Established in 1952, the VNPA is Victoria's leading community based nature conservation organisation. We are an independent, non-profit, membership-based group, which exists to support better protection and management of Victoria's biodiversity and natural heritage. We aim to achieve our vision by facilitating strategic campaigns and education programs, developing policies, undertaking hands-on conservation work, and by running bushwalking and outdoor activity programs which promote the care and enjoyment of Victoria's natural environment.

The following submission provides discussion and recommendations on 5 topics:

1. The importance of accessibility to nature and open space for urban populations
2. Enhancing Melbourne's "Green Edge"
3. Planning, creating and enhancing urban nature space networks
4. Management and funding for national parks, metropolitan parks and natural areas
5. Blue Infrastructure – "Blue Wedges" and coasts

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1. The importance of accessibility to nature and open space for urban populations

It is well known that spending time in nature is good for one's physical and mental health, and this underpins Parks Victoria's "healthy parks, healthy people" motto. Spending time in nature also increases appreciation and care for nature, and increases one's connection with the land.

This link is recognised in a Victorian Memorandum for Health and Nature 3rd April 2017, signed by the Victorian Health Minister and Minister for the Environment.

"There is now rapidly growing awareness that a thriving natural environment not only conserves biological diversity but also sustains the health and wellbeing of people and communities....

The role of parks and nature has been under-recognised as an important contributor to the prevention and treatment of many human health conditions. This was recently recognised through Resolution #64 at the International Union for Conservation of Nature's World Conservation Congress 2016 in Hawaii, which now demonstrates a global commitment to strengthen cross-sector partnerships that recognise the contributions of nature to health, wellbeing and quality of life...

*In addition, our health is heavily reliant on maintaining the living standards that make Victoria such an appealing place to be. The health of our natural assets underpins two of Victoria's most significant drivers of jobs and economic growth – agriculture and tourism – that help to sustain our liveability and prosperity, particularly in regional areas."*¹

As populations grow, urban expansion results in precious habitat remnants being bulldozed and paved for urban dwellings, roads and other infrastructure. Insufficient planning and population growth then leads to increased population density in existing suburbs which in turn leads to increased demand and pressure on existing environmental infrastructure including parks, bike paths and walking tracks. Open space in an urban context not only plays an important role for human health and wellbeing but also works to maintain ecosystem function and provide a range of ecosystem services to the Victorian community.

Healthy parks provide the community with a range of regulating services such as water purification, air filtration, climate regulation, pollination of agricultural crops and coastal protection, along with maintenance of habitats for native species, provision of nursery populations and genetic diversity. Healthy parks provide cost effective 'green infrastructure' services that provide additional benefits.

For example, according to a recent DELWP / PV Study on Valuing Victoria's Parks:

¹ <https://www.environment.vic.gov.au/biodiversity/victorian-memorandum-for-health-and-nature>

- Accounting for ecosystems and valuing their benefits, Melbourne's metropolitan parks help mitigate damage to community assets from floods and stormwater runoff. Around 35,000 ML of stormwater is released into metropolitan waterways from parks per year and without these parks, the volume of stormwater would double, requiring additional built infrastructure to capture and drain stormwater.
- The benefit of stormwater retention services from Melbourne's metropolitan parks is estimated at \$46 million per annum (or almost \$3,000 per hectare per annum). This is based on the avoided costs of built infrastructure to deal with additional stormwater.

The multiple roles of urban open space are often overlooked in urban planning. Creek corridors for example often have multiple uses; they can act as wildlife corridors, offer walking tracks but also act as floodways or drainage lines and stormwater retention. Open natural space in urban areas should be clearly planned along with other forms of passive and active open space, and should also maximise the multiple functions of this space.

In 2011 the Victorian Environmental Assessment Council undertook an investigation² into public land use in Metropolitan Melbourne and reported on the contribution of Melbourne's public land to liveability, enhancing biodiversity and providing public open space.

The following findings (which are also likely to be applicable across regional centres) highlighted significant observations from the investigation:

1. All vegetated public land contributes to Melbourne's liveability, including small areas such as nature strips, pocket parks, strips beside roads and railway lines.
2. The importance of treed areas of public land and water bodies for ameliorating the urban heat island effect is likely to increase in Melbourne as urban densification increases and the climate warms.
3. Public open space is a key contributor to Melbourne's liveability.
4. The community perceives that Melbourne's increasing population will result in a loss of quantity and quality of public open space.
5. Melbourne's public open space is highly valued by the community.
6. Different sectors of the community use and value public open space in different ways.
7. There is an uneven distribution of public open space across the investigation area, with no clear patterns apparent. However, established municipalities generally have less open space per capita than outer and growth municipalities.

² Victorian Environmental Assessment Council (2011). Metropolitan Melbourne Investigation Final Report. East Melbourne, Victoria. <http://www.veac.vic.gov.au/investigation/metropolitan-melbourne-investigation>

8. Without the retention and creation of open space on both public land and local council land, public open space per capita will decrease over time for almost all municipalities in the investigation area.
9. Current planning to ensure that adequate open space is provided in growth municipalities needs to continue. Without this planning, there is a risk that areas of these municipalities will have similar or lower levels of open space than some established municipalities because of their rapidly growing populations.
10. The projected decrease in public open space per capita is likely to be exacerbated in established municipalities where there is limited scope to create additional open space to meet population increases.

The final report contained 24 policy and strategy recommendations, and 21 public land use recommendations, many of which were supported at least in principle in the Government response.³ As of yet, most of the recommendations have not been implemented.

Likewise, the improvement in road infrastructure and transport, and access to natural areas outside of the urban areas, are also increasingly important.

In Melbourne, demand for larger more wild places on the outskirts or “green edge” of the city has particularly been increasing. For example, in recent years the Kokoda Track Memorial Walk (colloquially known as the “Thousand Steps”) in Dandenong Ranges National Park has become so popular as a place for combining fitness and nature, that on weekends people from all over Melbourne will visit the park. It is now not uncommon to see parked cars overflow the carpark onto Mt Dandenong Tourist Road and snake their way for a considerable distance up the mountain. Similar scenes occur at places like the Werribee Gorge.

In contrast with Sydney, there is a significant shortage of national parks and reserves within a short drive (90 min – 120 min) of metropolitan Melbourne. The protected area network surrounding Sydney consists of eight national parks and reserves in two connecting blocks that are separated by a transportation and urban development corridor. Collectively, they cover 1 million hectares of land. This far exceeds the formal national and state park network surrounding Melbourne, which is less than 185,000 hectares (a large chunk of which is in closed water catchments in the Yarra Ranges).

With the 2020 coronavirus pandemic it is likely that Melbourne’s immigration-driven high population growth will stall – at least for some time. Now is the time to catch up with demand, and to plan, create and improve the environmental infrastructure that

³ Department of Sustainability and Environment (2012). Victorian Government Response to Victorian Environmental Assessment Council’s Metropolitan Melbourne Investigation Final Report. Melbourne, Victoria. <http://www.veac.vic.gov.au/investigation/metropolitan-melbourne-investigation>

Melbournians and other Victorians want and need. This should include improving accessibility to open space and nature both within urban areas and outside urban areas.

Maintaining access to larger more wild places such as national parks on the periphery of urban areas, whilst simultaneously protecting the integrity of natural values, is of particular importance. Opportunities exist to fill gaps in the national parks estate close to Melbourne in the proposal for the Great Forest National Park in the Yarra Ranges and the proposed parks in Central West Victoria.

This was noted in the Final Report by the Victorian Environmental Assessment Council Final report into Central West, 21 June 2019.

“Along with nature conservation, recreation is now the major use of public land in the Central West Investigation area and the pressures of recreational uses and climate change are likely to continue to increase in the future. Establishing a platform from which to provide for recreation, without undermining the natural values upon which it depends, has been a major focus for VEAC in developing its final recommendations.”⁴

The map 1 below (Map 19 from Plan Melbourne) highlights the peri-urban areas and green wedges. While green wedges are important for maintain landscape values and restricting development intensity, they do not take into account the need for improved recreational access and protection of natural values.

⁴ Page 98 <http://www.veac.vic.gov.au/investigation/central-west-investigation>

Map 1: Melbourne peri-urban areas



Map 19

Melbourne's green wedges and peri-urban areas

- | | |
|--|--|
| Green wedge land | Road network |
| Peri-urban area | Rail network |
| 100-km radius from central Melbourne | ✈ Transport gateway – major airport |
| Capital city | ✈ Transport gateway – airport |
| Regional city | ⚓ Transport gateway – seaport |
| Regional centre | Urban area |
| Peri-urban town | Urban growth boundary |
| | Local government area boundary |

2. Enhancing Melbourne's "green edge"

A great city needs a great system of national parks. Within a 90 minute drive of central Melbourne are habitats of national and international conservation significance, only some of which are protected in national parks at present. There is also a diverse range of landscapes, from grasslands to tall forests.

Although Victoria has a fairly extensive national park and conservation reserve system, our great variety of terrestrial ecosystems are unevenly protected. We are far from meeting the national goal of a comprehensive, adequate and representative reserve system. (For further discussion about filling gaps in our reserve system see section 12 of our submission to the parliamentary inquiry into ecosystem decline here:

<https://vnpa.org.au/publications/submission-parliamentary-inquiry-into-ecosystem-decline-in-victoria/>)

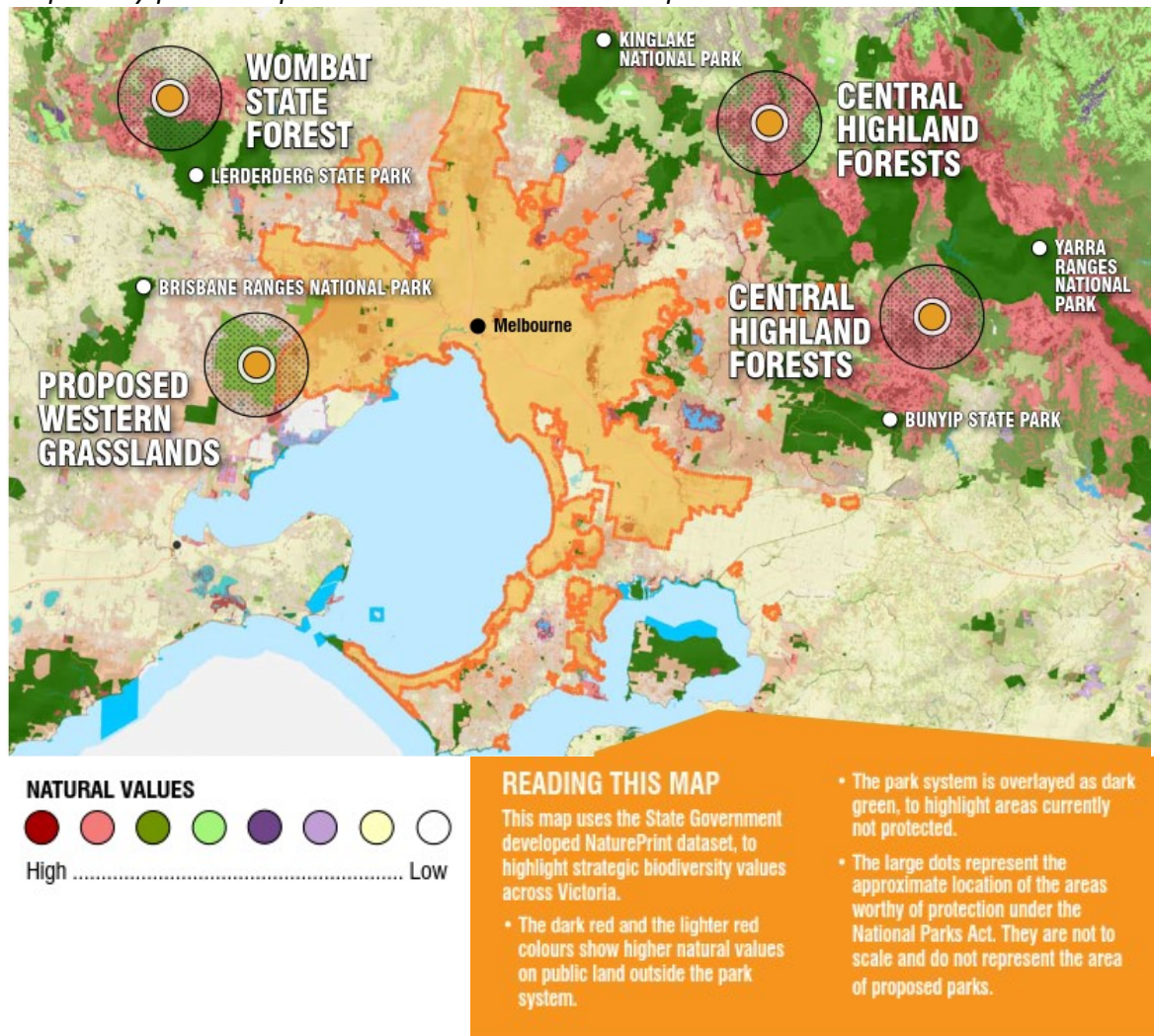
The last decade has been a low point in the creation of parks, with few areas being formally added to the park estate by either side of politics.⁵ The progress of creating new national parks on public lands in Victoria is now at its slowest pace in the past 60 years. See: <https://vnpa.org.au/national-parks-creation-needs-a-jump-start/>

There are currently some historic opportunities for nature reservation in Victoria that will help towards filling some of the gaps in the reserve system and which will also encourage nature based tourism close to Melbourne and other regional towns. These proposals have high public support and are waiting for government to gather the political will to take action. These are:

- new national parks and reserves in the high conservation value forests of the central west including the Wombat, Wellsford, Mount Cole and Pyrenees Range forests
- the Great Forest National Park to protect the magnificent forests of the central highlands and Melbourne's water catchments
- the Western Grassland Reserve and the Grassy Eucalypt Woodland Reserve to protect highly threatened native grasslands on the Victorian Volcanic Plain

⁵ <https://vnpa.org.au/national-parks-by-premier-op-ed/>

Map 2: Key potential protected areas in Melbourne peri urban area.



2.1 New national parks in Victoria's central west

The current Andrews Government is yet to make a decision about proposals for 60,000 ha of new national parks in Victoria's central west, in the Wombat, Wellsford, Mt Cole and Pyrenees State Forests. After four years of government sponsored investigation and consultation, the government missed its statutory deadline to make a decision in late February 2020.⁶ See here: [Andrews government late for an important date](https://vnpa.org.au/andrews-government-late-for-an-important-date/)

The Victorian Environmental Assessment Council's final recommendations for public land use in the Central West Investigation area, include an increase of 58,115 hectares in protected areas as national park, conservation park, nature reserve, bushland reserve and heritage river – including the Wombat Forest (near Daylesford), Wellsford Forest

⁶ <https://vnpa.org.au/andrews-government-late-for-an-important-date/>

(near Bendigo), Pyrenees Ranges Forest (near Avoca), and Mount Cole Forest (near Beaufort) as well as many smaller forest areas. An additional 19,728 hectares of regional parks are proposed close to townships and to be managed primarily for recreation which will allow for almost all forms of recreation, including dog walking, fossicking and prospecting.

The proposed new national parks and reserves in the central west will protect (from damaging activities such as mining and logging) important habitat types currently under-represented in the reserve system, and will help deliver key elements of Victoria's biodiversity strategy. Victoria's forests of the central west have incredible natural values. Their forests harbour hundreds of threatened species such as the Powerful Owl, Brush-tailed Phascogale, Greater Glider, Swift Parrot and many rare plants.

Notably, the Wombat Forest near Daylesford is a vital refuge for a regionally significant population of the Greater Glider. A new national park here would secure long-term protection for this iconic species that is in decline across much of the state. (See a new report released by the Victorian National Parks Association and local group Wombat Forestcare [Wombat Forest, A greater refuge for Gliders](#)). This is now increasingly important as last summer's large-scale wildfires burnt through 32% (21% at high severity) of modelled Greater Glider habitat in Victoria.

The new parks will also protect eleven significant headwaters of important rivers including the Moorabool, Werribee, Lerderderg, Maribyrnong and Wimmera rivers – which provide water supply for large areas of western and northern Victoria.

In the past few months exploration works for gold and other minerals involving large drilling rigs has commenced in the proposed Wombat-Lerderderg National Park, in the headwaters of the Heritage Listed Lerderderg River. Bushwalkers, conservationists and native plant enthusiasts are also concerned that intensified logging plans have been released for key areas around the Beeripmo Walk, a popular overnight hiking trail in the Mount Cole forest within the proposed national park for this area. Active logging happening now on the park boundary is risking the future of the threatened rare endemic Mount Cole Grevillea which has already suffered a 75% decline, largely from logging.

It has been almost a decade since the last major additions to our national parks and reserves system in Victoria. Now is the time to act – new national parks in our state's central west will be a positive outcome for people and nature during a year Victoria needs it most.

The central west forests are within the Central Victoria Uplands bioregion which only has approximately 10% of its Ecological Vegetation Classes (units for assessing ecosystem representation) targets met. 43 of the 107 important EVC's identified in the central west investigation area will have significantly improved representation in the Comprehensive

Adequate Reserves system (CAR) system if VEAC's proposals are implemented. This will add up to 16,000 hectares of particular EVC's and will either meet or significantly add to ecosystem representation targets.

For more information on the proposed new national parks in Victoria's central west, see our following recent Park Watch articles: [A dozen good reasons for new national parks in the central west of Victoria](#) , and [Mount Cole still on the chopping block](#) which is still seeing clear fell logging.

2.2 The Great Forest National Park

A proposal for a Great Forest National Park and network of conservation reserves in Victoria's Yarra Ranges and surrounding Central Highland forests has been developed by VNPA and other conservation groups. See more here: [Great Forest National Park summary report](#). It would see 353,213 hectares of protected forests added to the existing 183,542 hectares of protected areas incorporating over ten smaller parks into a single, contiguous reserve system around towns such as Healesville, Kinglake, Toolangi, Warburton, Marysville and Wood's Point.

Much of the existing reserve system directly adjoins state forest that is being logged. Most of the logging is concentrated in the tall wet Ash forests of the region.

Victoria's Alpine and Mountain Ash forests have been disproportionately targeted by logging, the impacts of which are subsequently compounded by fire. Logging and fire has taken a catastrophic toll on older growth Ash forests, and now less than 1.16% of the 161,200 ha Mountain Ash landscape is pre 1900 old growth. Victoria's Mountain Ash ecosystem has been internationally listed as critically endangered on the IUCN Red List of Ecosystems.

After a devastating fire season, there is an urgent need to protect our remaining unburnt forests from the further serious threat of commercial logging. Aside from the obvious direct impacts on plants and wildlife, logging also changes the structure and composition of forests and increases fire risk (see further discussion on logging and fire risk in section 6 of our submission to the parliamentary inquiry into ecosystem decline <https://vnpa.org.au/publications/submission-parliamentary-inquiry-into-ecosystem-decline-in-victoria/>). Logging that occurs near or adjacent to existing protected areas also creates the problem of 'edge effects', where the creation of edge along the protected area boundary alters the microclimate of the protected forest, along with promoting the spread of weeds and invasive animals.

The forests of Victoria's Central Highlands provide important habitat for a range of threatened species that rely on intact forests, large old trees and minimal disturbance. Some of these species include Leadbeater's Possum (Victoria's endemic and critically endangered faunal emblem), Sooty Owl, Powerful Owl, Masked Owl, Mountain Brushtail Possum, Greater Glider, Sugar Glider, Baw Baw Frog and Barred Galaxias.

Many other iconic species also occur in the proposed area such as the endangered Spot-tailed Quoll (the largest carnivorous marsupial on the Australian mainland), the critically endangered Helmeted Honeyeater and the Superb Lyrebird.

BirdLife Australia estimates that over 40% of the Superb Lyrebird's range was impacted by the recent large landscape scale bushfires. The Superb Lyrebird is one of Australia's most treasured animals and the Great Forest National Park will help protect its habitat. We must not wait for Victoria's lyrebirds to become threatened with extinction before acting to protect it from logging, fire, cats and foxes.

A new Great Forest National Park and network of conservation reserves could be created following an investigation by the Victorian Environmental Assessment Council informed by extensive consultation with the broader Victorian community, forest users and Traditional Owners. In addition to nature conservation and helping protect Victoria's iconic Leadbeater's Possum, the park network would host a range of activities such as bike riding, bushwalking, bird watching, four wheel driving, camping and eco-tourism.

The park is expected to be to Melbourne what the Blue Mountains are to Sydney and would support regional tourism in local communities and generate new, sustainable, long-term employment. The Great Forest National Park will also increase the security of Melbourne's domestic water supply catchments.

Globally renowned naturalists like Sir David Attenborough and Dr Jane Goodall along with 30 international, national, local environment, recreation and scientific groups, are supporting the creation of the Great Forest National Park. There is also widespread support among the Victorian community.

"The maintenance of an intact ecological system is the only way to ensure the continued existence of biodiversity, safeguard water supplies and provide spiritual nourishment for ourselves and future generations. It is for these reasons, and for the survival of the critically endangered Leadbeater's Possum, that I support the creation of the Great Forest National Park for Victoria."

Sir David Attenborough

Victoria's proposed Great Forest National Park could draw almost 380,000 extra visitors a year to the Central Highlands, add \$71 million annually to the local economy and generate 750 jobs with a little private investment, according an analysis by the Nous Group. <https://www.greatforestnationalpark.com.au/park-economy.html>

A commitment to create the Great Forest National Park in the Yarra Ranges and surrounds is an investment in the future. It is an opportunity for Victoria's Government to invest in the state's natural heritage and show the world what first class parks management looks like.

2.3 The Western Grassland Reserve and the Grassy Eucalypt Woodland Reserve

The 'Natural Temperate Grasslands of the Victorian Volcanic Plain' and the 'Grassy Woodlands of the Victorian Volcanic Plain' are both listed under national environmental laws as 'critically endangered'. Once covering almost a third of Victoria, now less than 2–5% of these rare grasslands remain with less than 1% in high quality condition. What remains is home to dozens of threatened fauna and flora species listed under national environmental laws including the Growling Grass Frog, Golden Sun Moth, Striped Legless Lizard, Matted Flax-lily and several migratory bird species.

The decade-old Melbourne Strategic Assessment program had intended to streamline urban development approvals and ensure the survival of the remaining critically endangered grasslands and grassy woodlands threatened by urban sprawl in Melbourne's west and north. To offset losses from urban development, in 2010 the Victorian government committed to purchase and establish by 2020, a 15,000 hectare Western Grassland Reserve (between Werribee and Melton) and a 1,200 hectare Grassy Eucalypt Woodland Reserve (near Donnybrook), along with a range of other measures.

10 years later DELWP has still not met its commitments to establish the reserves and has purchased only 10 % of just one reserve to date, while property developers have continued apace. It is time for the Victorian government to act on this commitment create the highly important reserves as promised. For further discussion about Victoria's threatened grasslands see section 13 of our submission to the parliamentary inquiry into ecosystem decline <https://vnpa.org.au/publications/submission-parliamentary-inquiry-into-ecosystem-decline-in-victoria/>.

The VNPA and a range of community groups are concerned that this program is failing to deliver protection of our most endangered ecosystems. Originally flagged as costing almost \$1 billion over 20-40 years and saving the development industry at least \$500 million over the life of programs, to date it has failed to deliver for the environmental protection as promised. The total cost of the program is now likely to be at least 80% higher.

The MSA program allows the clearing of around 4,000 to 5,000 hectares of grasslands and other habitat (some high-quality) within the urban growth boundary, on condition of the establishment of a series of large conservation reserves and other measures to offset the loss, mostly outside the urban area, paid for through levies on urban development.

Concerns by community members and ecologists around the "like for like" quality of offset vegetation within the urban growth boundary with poor quality vegetation within the WGR are justified, as DELWP has only been able to undertake 'over the fence' survey work of parts of the proposed WGR. This issue was also acknowledged in the Auditor General report which also noted that DELWP can't demonstrate that the quality of land purchased matches that of land cleared.

A recent Victorian Auditor General's Office (VAGO) audit released in mid-June 2020 titled: *Protecting critically endangered grasslands*, focused on the implementation of the MSA program. We agree with the VAGO that:

- DELWP has not met its commitments to deliver the Western Grassland Reserve (WGR) and Grassy Eucalypt Woodland reserve by 2020.
- The delays in acquiring these reserves also mean they will likely require a significantly greater investment to restore and retain these ecological values than if they had been purchased within the intended 10-year timeframe.
- At least 22% of the existing western grassland reserve is not considered grassland and large areas are considered low quality or 'nutrient enriched'.
- None of the proposed Grassy Eucalypt Woodland has been purchased (or seeming even planned).
- DELWP cannot demonstrate that interim management to date, to preserve the Ecological value of the WGR, has been and will be cost effective (or ecologically effective).
- The MSA will need to new governance arrangements to ensure they provide sufficient oversight, stakeholder involvement and transparency to support program delivery, and that Independent monitoring has not occurred in line with the MSA program.⁷

We acknowledge the Melbourne Strategic Assessment (Environment Mitigation Levy) Act 2019 coming into force on 1 July this year, will potentially improve some of the oversight and revenue components of the scheme. The bill has some useful improvements, but does not deal with the fundamental flaws and failed delivery of grassland reserves and other measures. The situation remains that it will likely take some years for the impact of the Act to flow through, and as yet there is no real change in the pace of delivery of protection, or extent and effectiveness of management of grasslands or grassy woodlands or other features of the MSA. Likewise, with the impact of COVID on the economy, urban growth rates are likely to slow significantly, and expected increases in clearing fees are unlikely to provide the revenue to deliver this program.

This was strongly debated and disputed by many conservation groups and ecologists at the time of establishing the MSA in 2010. There was and remains concern that the large conservation reserves outside the urban areas did not contain the same natural values as what was being lost within – that they were not an equal 'replacement' and that it was far better to keep some of the smaller areas of high-quality grassland and other habitat within the urban areas.

⁷ <https://www.audit.vic.gov.au/report/protecting-critically-endangered-grasslands>

Options of protecting smaller areas of high quality grassland, which have not been cleared, within the existing UGB, should be reconsidered for protection. We note to date that there have only been around 654 ha out of 6000 ha cleared (around 10%) of area within the urban growth boundary.

In the case of grasslands, small can be beautiful. Bias towards larger areas for reservation continues, even though there is considerable evidence that smaller grasslands are quite viable.⁸ The undervaluing of smaller areas of remnant grassland leads inevitably to greater push for offsetting of these remnants (as per the Melbourne Strategic Assessment). Rather than destroying all these remnant areas of critically endangered vegetation communities and important populations of threatened species, good design and management can integrate them into the network of smaller conservation reserves within the Urban Growth Boundary that will be complemented by the major western grassland reserves. This would be an effective approach to assist in:

- conserving species and important genetic diversity within species
- conserving representative areas of different grassland sub-communities
- conserving endangered woodland and ephemeral wetland communities that are not strongly represented within any grassland reserves
- conserving smaller grassland reserves as significant, sustainable and valued community assets

In 2013 the VNPA worked with the Australian Institute of Landscape Architects (AILA) and landscape architect and editor Adrian Marshall to produce the guide “Start with the grasslands: Design guidelines to support native grasslands in urban areas”. The guide is the culmination of more than two years of research and is a resource for anyone interested in conserving and managing grasslands but particularly useful for those planning new urban areas, including state and local government planners, planning consultants and landscape architects. See: [Start with the grasslands](#)

Start with the Grasslands provides guidance for the design and management of native grasslands (both large and small) within the Victorian urban context to maximise environmental and social outcomes. This guide is applicable to large-scale development of peri-urban greenfield sites, urban infill, the reconsideration of existing grasslands within established communities, and the reworking of a grassland’s relationship with the surrounding urban fabric to accommodate change in adjacent land use.

This document provides:

- An overview of the benefits of grasslands to the communities with which they co-exist.

⁸ McCarthy, M. A., Thompson, C. J., & Williams, N. S. G. (2006). Logic for designing nature reserves for multiple species. *American Naturalist*, 167(5), 717–727. and Williams, N.S.G. (2005a). The ecology of fragmented native grasslands in urban and rural landscapes. PhD thesis, University of Melbourne.

- An understanding of the vulnerability of these ecosystems in the context of planned development.
- An analysis of a number of existing grasslands in Melbourne's north and west and discussion of the lessons learnt from these examples.
- Guidelines for development, from overall planning advice through to the specifics of fence design and strategies to engage communities.
- Checklists to support the guidelines' application.
- References to further information

Start with the Grasslands is predicated on the recognition that grasslands need more than legislation or ecological knowledge to prosper – they need collaborations between professionals at all levels, good design, and the support of the communities with which they interact. It is possible to design and manage smaller areas of grassland within the urban areas and a number of the case studies in *Start with the Grasslands* highlight that these areas can become important community assets.

Recommendations

The VNPA recommends that the Committee recommend to the Victorian Government the following:

- make a decision on the proposals to create 60,000 hectares of new national parks and reserves in Victoria's central west Wombat, Wellsford, Mt Cole and Pyrenees Forests – this decision is now well overdue its statutory timelines under the *Victorian Environment Assessment Council Act 2001*.
- initiate a Victorian Assessment Council Investigation of Victoria's central highlands to investigate the best way to manage public land use in the region to inform the creation of a Great Forest National Park
- immediately deliver on promises to protect endangered temperate grasslands and grassy woodlands and establish the Western Grassland Reserve and the Grassy Eucalypt Woodland Reserve, prioritising the high conservation areas first
- consider improved planning guidelines and specialist management for the protection of smaller grassland reserves with urban growth areas.

3. Planning, creating and enhancing urban nature space networks

Victoria is the most densely populated state in Australia. According to the Australian Bureau of Statistics, in September 2019 Victoria had a population of 6.63 million people and a population growth rate of 2.0% per annum – the highest growth rate in Australia.

As 62.5% of Australia's population growth is from net overseas migration, it is likely that due to the 2020 pandemic that Melbourne's population growth will stall – at least for some time. As Victoria has no coherent plan to manage the impact of population growth on open space or natural areas, the current reprieve from population growth gives the state a chance to get its planning for infrastructure back on track, including

environmental infrastructure such as parks and reserves, and better planning to reduce the impact of population growth and urbanisation on biodiversity.

While there is not necessarily a straight line between population growth and destruction of natural areas, urban sprawl is certainly a threat to nature, especially ecosystems such as grassland close to the urban fringe (see <https://vnpa.org.au/urban-sprawl/>).

Issues can also arise in established suburbs. Population densification increases demand and recreational pressure on existing parks and reserves, and then subdivision and development results in further losses of remnant vegetation, established gardens and urban biodiversity.

Over recent decades older homes on large blocks in Melbourne are often sold, demolished, all vegetation is removed, and then multiple dwellings are erected in their place. This urban deforestation and increase in concrete is certain to be impacting on Melbourne's flora and fauna. Invasive species, particularly foxes, cats and Indian Myna birds, also play a destructive role.

Many species that seemingly have adapted well to urban areas such as the Australian Magpie, wattlebirds and the Tawny Frogmouth are only present due to the food and habitat provided by remnant trees and established gardens, parks and reserves. Other species such as the Kookaburra and Eastern Rosella appear to be more strongly associated with areas in and around well-treed parks and reserves rather than gardens.

Some declines are already apparent in Melbourne. Once common in gardens, the Willy Wagtail, which prefers more open woodlands rather than dense forests, has all but vanished. And the iconic Green Grocer cicada, the sound of Christmas in south-eastern Australia, has declined in many suburbs most likely due to the loss of suitable mature trees and population explosions of the invasive Indian Myna bird. The Australian Painted Lady butterfly also appears to have declined significantly.

As urban areas become more hostile to native wildlife, the species that remain need to compete for food and habitat in remaining established gardens, parks and reserves. There is a need to enact better planning to retain our urban biodiversity.

In 2011 the Victorian Environmental Assessment Council released a report on their *Metropolitan Melbourne Investigation*⁹ which identified and assessed the uses, resources, condition, values and management of Crown land, and public authority land in metropolitan Melbourne.

⁹ <http://www.veac.vic.gov.au/investigation/metropolitan-melbourne-investigation/reports>

The report outlined a number of recommendations for enhancing the contribution of public land to Melbourne's liveability and natural and cultural values, however these recommendations have largely remained ignored. Some of the recommendations included:

- additional protection for Crown land with remnant native vegetation through reservation
- conserve and protect biodiversity whilst providing for informal recreation for large numbers of people associated with enjoyment of natural or semi natural surroundings or open space
- local biodiversity action programs
- the next Victorian Coastal Strategy to consider the implications of sea level rise and inundation for Crown land foreshores
- update the public open space data for public land and land owned by local councils at least every five years and use the data to inform the Government's proposed metropolitan strategy for Melbourne
- preparation of a metropolitan open space policy and strategy that provides a long-term plan for public open space in metropolitan Melbourne

3.1 Protecting remnant vegetation in urban areas through reservation

Maintaining natural values in areas outside conservation reserves or the protected area system can be more difficult in Melbourne than elsewhere because of the pressures on public land to accommodate a number of often incompatible uses. This emphasizes the importance of reservation for the retention and protection of remnant native vegetation and biodiversity values.

The first recommendation of the VEAC Metropolitan Melbourne Investigation final report was that additional protection for Crown land with remnant native vegetation be provided by: (a) reserving unreserved Crown land for a purpose that includes the protection of its remnant native vegetation; and (b) amending the reservation purpose of reserved Crown land, where appropriate, to include the protection of its remnant native vegetation.

In addition to general recommendations confirming current public land use, the report contained recommendations for changes to land use to enhance the protection of natural values, and included the addition of approximately 3,640 hectares of public land to the protected area system.

About 29,790 hectares or 33 per cent of public land, and about half of all Crown land (29,680 hectares) in the investigation area was in the protected area system. The recommended additions *"aim to enhance the protection of natural values in the investigation area through the conservation of threatened species and communities, and by consolidating management and strengthening links along vegetated corridors. While there is limited scope in Melbourne's highly urbanized environment to make significant*

contributions to meeting the nationally agreed criteria for a comprehensive, adequate and representative reserve system on public land, even small improvements are important, given the very high pressures on biodiversity.”

The recommended changes to land use and protected area additions included:

- Approximately 2,590 hectares be added to Kinglake National Park (including the Yan Yean Reservoir and surrounds and the northern and southern buffers of the Sherwin Ranges)
- An area of approximately 62 hectares be added to Bunyip State Park.
- Approximately 970 hectares of Crown land near Point Cook abutting the coastline and Point Cooke Marine Sanctuary be managed as one coastal park under Schedule Three of the National Parks Act. This area includes the existing Point Cook Coastal Park and Cheetham Wetlands, Truganina Wetland Coastal Park and the adjoining section of the Altona Foreshore Reserve, and 10 hectares of unreserved Crown land, and unused and unlicensed government road.
- A new 8 hectare Bandicoot Corner Bushland Area
- A new 5 hectare Edithvale Wetland Bushland Area
- An addition of 5 hectares to the existing Seaford Wetland Bushland Area
- A new 3 hectare Beaumaris Cliffs Geological and Geomorphological Features Area
- A new 6 hectare Yallock Creek Streamside Area

Few if any of these specific land use change recommendation from 2001 have been implemented, most were either fully or partially supported by the government of the day in March 2012. <http://www.veac.vic.gov.au/documents/Vic-Gov-Response-to-VEAC-Metro-Melb.pdf>. The recommendation of this detailed investigation should be revisited by the committee.

Recommendation:

That the committee revisit and refresh the recommendations of the 2010 Victorian Environmental Assessment Council Metropolitan Melbourne Investigation

3.2 Delivering Large Regional Suburban Parks.

The current government promised at the last election that if re-elected, *“Labor will invest \$150 million to create more than 6,500 hectares of parkland and new walking and bike trails right across Melbourne, giving families great places to spend the weekend or a day off.”*

In a media release¹⁰ by the Premier in November 2018 titled “CREATING A RING OF NEW PARKLAND IN OUR GROWING SUBURBS”, the government committed to the following:

In Melbourne’s south-eastern suburbs:

- establish Cardinia Creek South Parkland, a 508 hectare parkland near Officer

¹⁰ <https://www.danandrews.com.au/more-green-spaces-in-our-communities>

- create the Sandbelt Parklands, a 355 hectare chain of parks running from Moorabbin to Dingley Village with walking and bike trails, conservation and adventure play areas
- complete Clyde Regional Park, creating a 120 hectare parkland
- plan for the Frankston Greenbelt that will link together 1,881 hectares of parks and reserves for locals to enjoy between the Seaford wetlands and Mornington

In Melbourne's north and north-eastern suburbs:

- create a new 2,778 hectare Upper Merri Park, near Craigieburn
- expand the Quarry Hills Parkland to cover 1,088 hectares, near South Morang
- complete the Plenty River Trail, building another 17 kilometres of walking and cycling trail stretching from Mernda to the Western Ring Road at Greensborough
- invest in new bike and walking trails across Nillumbik, Moreland, Banyule, Darebin, Hume and Whittlesea council areas
- undertake a feasibility study for a new Wallan Regional Park

In Melbourne's west and north-western suburbs:

- create a new 1,008 hectare Jackson Creek Park, near Sunbury
- complete Kororoit Creek Park, creating a 260 hectare parkland
- complete Werribee Township Regional Park, creating a 340 hectare parkland
- complete planning for a new 130 hectare Toolern Regional Park at Melton
- complete planning for a new 223 hectare Werribee River Park at Wyndham

It was also stated that "As well as creating large new parklands, bike and walking trails across Melbourne's growing outer suburbs, Labor will invest \$35 million to purchase or repurpose land to create 25 new pocket parks in built up areas, where there is a lack of public open space."

The VNPA welcomes these commitments <https://vnpa.org.au/labor-commitment-to-new-suburban-parks/>.

We note that a successful process to establish three regional parks, (Clyde, Kororoit Creek and Werribee Township) is well under way. These parks require the acquisition of private land, and consequently the State budget committed funds for land acquisition. Public Acquisition Overlays have been introduced into the relevant Planning Schemes, with the Minister for Environment as acquiring authority.

The commitment from 2018 election also includes creation of a new 2,778 hectare Upper Merri Park (the largest of the regional park proposals) and a feasibility study for a new Wallan Regional Park. These parklands will be invaluable assets for new communities in the upper Merri catchment and the Northern Growth Corridor.

While we understand DELWP began planning to implement these commitments in 2019, progress on the deliverables in the Merri catchment is well behind the timeline.

We understand that the COVID-19 situation has slowed down many activities and processes, but this does not fully explain the slowdown in delivery. A schedule issued by DELWP included 'Identify land and boundaries for each park and draft plans' by March 2020. As of late 2019, the Wallan Regional Park Feasibility Study by consultants was due to be completed in early May 2020, but currently "is still in its early stages".

In the Upper Merri and Wallan areas there appears to be an absence of a strategic planning process for regional park planning that will inform and guide precinct structure planning in the Upper Merri. Precinct Structure Plans (PSP) establish the future urban structure and land use pattern in urban growth areas.

A current example is Beveridge North West PSP which includes the upper Kalkallo Creek, a proposed inter-urban break between Beveridge and Wallan, and Spring Hill cone – all of which are in the study area for Wallan Regional Park. The advertised PSP did not refer to the proposed park and proposed substantially reducing the extent of the Kalkallo Creek corridor and the width of the inter-urban break. Through the course of the Planning Panel hearings which concluded in mid-August 2020 (13/08/20) there were significant pressures to further extend residential zoning in the (unidentified) parkland investigation areas.

Another two PSPs covering the Wallan Park study area are being fast-tracked by the State Government as part of post-COVID recovery stimulus. It appears that the regional park planners are waiting to be directed by the Precinct Structure Plans rather than vice versa. Some scrappy patches of parkland comprised of undevelopable land is the potential outcome.

Recommendations:

- That the committee investigate the delays in the delivery of the promised Wallan and Merri Creek parklands.
- That a clear publicly available implementation plan, with timelines be produced for the delivery of the Suburban Parks package promise at the last election.

3.3 The need for an Urban Nature Space Strategy

Linking People and Spaces (Parks Victoria, 2002) was the last State Government Plan, which had a metropolitan wide approach to natural areas and open space. Plan Melbourne which was released in 2014 (with various updates) acknowledges the importance on natural areas in metropolitan areas:

"There is a critical need to maintain and improve the overall extent and condition of natural habitats, including waterways. Natural habitats need to better protect native flora and fauna, enhance the community's knowledge and acceptance of

wildlife in areas they live, enhance access to nature and recreational opportunities across urban areas and make Melbourne an attractive place to live and visit...”¹¹

The plan includes a number of policies, including:

- Policy 6.5.1 Create a network of green spaces that support biodiversity conservation and opportunities to connect with nature
- Policy 6.5.3 Protect the coastlines and waters of Port Phillip Bay and Western Port and Policy 4.1.4 Protect and enhance the metropolitan water's edge parklands

There are also policies to protect green wedges, distinctive landscapes and biodiversity in peri-urban areas and local parks. The Melbourne 2030 implementation plan includes a range of measures around the protection of waterways including the Yarra River Protection (Wilip-gin Birrarung murrn) Act 2017 and associated actions. There is also a range of climate change mitigation, coastal hazard reduction plans, but nothing which explicitly addresses nature within the urban context or provides a vehicle for policy 6.51 to be clearly implemented.

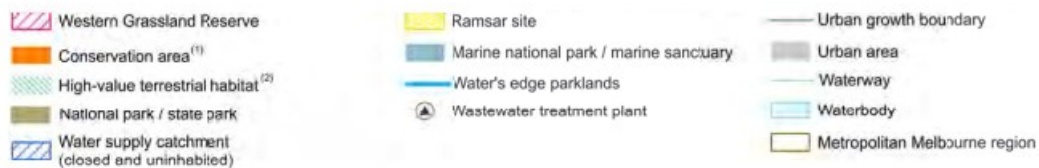
The following map (Map 21 page 120) from Plan Melbourne highlights some of those values.

¹¹page 121 Plan Melbourne 2017 -2050 <https://www.planmelbourne.vic.gov.au/the-plan>

Map 3: Plan Melbourne identified Natural Areas



Biodiversity conservation and natural features



(1) As identified in the Biodiversity Conservation Strategy for Melbourne's Growth Corridors

(2) Represents the three highest levels of NaturePrint strategic natural values

The following map (Map 20 page 119) from Plan Melbourne highlights the potential open space additions, though there appears to be some misalignment or misunderstandings of the role of things like closed water catchment as highlighted in Map 21.

Map 4: Plan Melbourne proposed open space



Map 21

Open space

- Public open space ⁽¹⁾
- Restricted public land (with open space potential) ⁽²⁾
- Private open space ⁽³⁾
- Regional park — emerging ⁽⁴⁾
- Regional park — proposed ⁽⁵⁾
- Conservation reserve — emerging ⁽⁶⁾
- Conservation reserve — proposed ⁽⁷⁾
- Water's edge parklands
- Urban growth boundary
- Urban area
- Waterway
- Waterbody
- Metropolitan Melbourne region

- (1) Publicly owned and publicly accessible - includes areas where access is free of charge but limited or managed in some way
- (2) Publicly owned and provides for restricted public access and/or use - includes areas where access is not possible by the public most of time or access is significantly restricted by fees and charges and/ or barrier fencing
- (3) Privately owned or leased. Public access prohibited or significantly restricted
- (4) Parks where land acquisition or transfer and/or associated infrastructure delivery is incomplete
- (5) Future parks where land and infrastructure delivery has not yet commenced
- (6) Reserves where land acquisition or transfer and/or associated infrastructure delivery is incomplete
- (7) Future reserves where land and infrastructure delivery has not yet commenced

The implementation plan Action 93 Metropolitan open space strategy notes that an open space strategy will be prepared and notes natural areas in passing.

“Prepare an open space strategy that enhances recreation, amenity, health and wellbeing, species diversity, sustainable water management and urban cooling across Melbourne”¹²

While we acknowledge the good work undertaken to protect water ways and river corridors, broader natural assets are being neglected or largely ignored in the Plan Melbourne implementation plan. Likewise many of the proposed conservation reserves flagged in plan Melbourne such as the Western grassland reserves have failed to be delivered (see section 2.3 of this submission).

Approximately 145,600 hectares of land in the Metropolitan Melbourne VEAC investigation area contains native vegetation, of which two thirds is private land and one third is public land (i.e. Crown and public authority land). Approximately half of the public land with remnant native vegetation is managed for conservation within the protected area system, so there is a big opportunity to enhance and build on this asset.

The park or open space plan in Plan Melbourne (see Map 20), provides no real differentiation between open space for active or passive recreation use and is in some instance plainly wrong – for example classifying large areas of the Yarra Ranges as simply public open space, when most of it is a closed water catchment (for water quality purposes) with no public access.

Even though Plan Melbourne has been in place for six years, there is still no comprehensive open space strategy for Metropolitan Melbourne.

In reality there is also no real strategy for natural open space in the Melbourne Metropolitan Area, and there hasn't been a formal one for 18 years. This should be developed as either a stand alone strategy or as part of the commitment to an open space strategy.

Recommendations

That the committee consider recommending:

- As part of the Plan Melbourne implementation plan develop a specific Urban Nature Space Strategy to recognise, enhance and integrate the role of natural areas within the urban context.
- That an Urban Nature Space Strategy also consider the role and opportunity for enhanced protection and management of natural areas adjacent or within a short

¹² page 41 PLAN MELBOURNE REPORT ON PROGRESS 2019

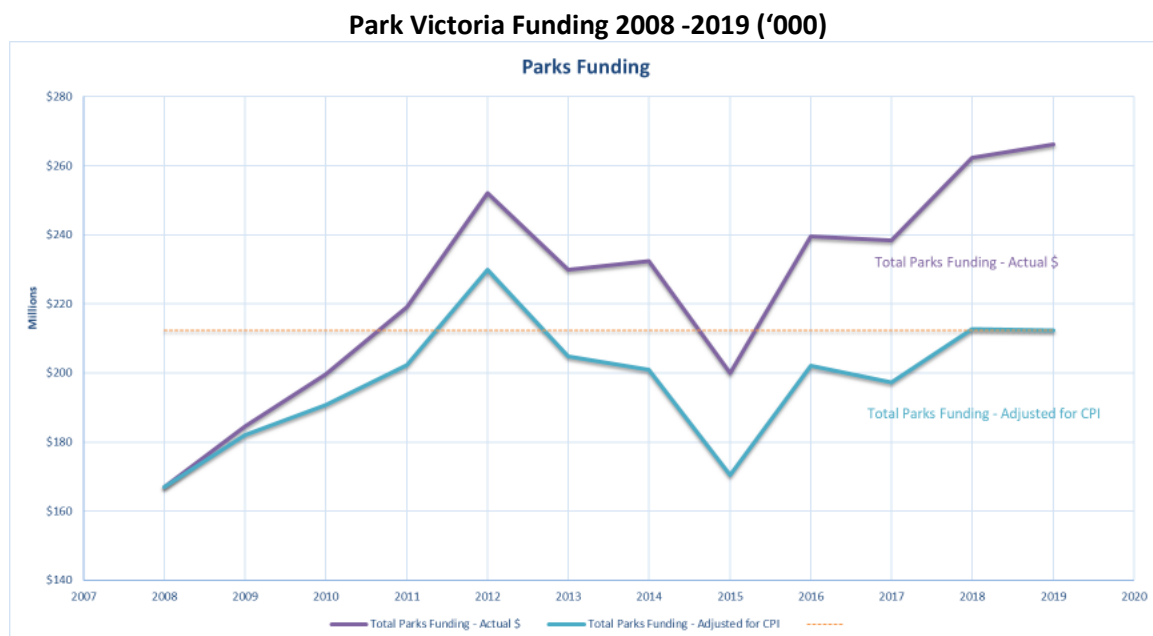
https://www.planmelbourne.vic.gov.au/_data/assets/pdf_file/0003/516171/Report-on-Progress-2019.pdf

commute/drive from surrounding metropolitan Melbourne and regional cities such as Bendigo and Ballarat.

- Revisit and refresh the recommendations of the 2010 VEAC Metropolitan Melbourne Investigation.
- Complete a metropolitan-wide open space strategy, with a clear time line within the Plan Melbourne implementation plan.

4. Management and funding for national parks, metropolitan parks and natural areas

Improving access to nature is not just about additions to our system of parks and reserves. Currently, funding for the management of Victoria's park system sits at less than 0.5% of the state budget. This inadequate funding does not match legislated objectives for park management; it does not match community expectations; and gives little recognition of the considerable economic benefits that parks bring.



While funding for national parks was dramatically cut between 2013 and 2016, it has increased in raw terms to above 2012 levels. However, if cost increases are adjusted for CPI, overall funding would still be \$20 to \$30 million short of 2012 levels.

It is also worth noting that approximately 37% of parks funding comes from the Parks and Reserve Trust, which is collected on water bills in certain parts of Metropolitan Melbourne. See: <https://www.parks.vic.gov.au/about-us/parks-charge>. The charge is however restricted to use on development, management and maintenance of metropolitan parks, gardens, trails, waterways, and zoos. In effect this reduces the amount of funding that is available for management of the broader parks estate across the whole of Victoria.

Park Victoria Funding Sources 2008 -2019 ('000)



	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Government Funding (\$'000)	\$66,608	\$83,067	\$92,089	\$110,455	\$122,055	\$102,567	\$97,523	\$76,773	\$97,672	\$103,447	\$117,065	\$113,115
Parks & Reserves Trust (\$'000)	\$66,920	\$68,167	\$72,428	\$77,132	\$80,331	\$85,422	\$86,965	\$84,323	\$97,537	\$97,512	\$101,114	\$97,504
All other income (\$'000)	\$33,436	\$33,300	\$35,004	\$31,413	\$49,613	\$41,910	\$47,850	\$38,909	\$44,306	\$37,379	\$44,134	\$55,514
Total	\$166,964	\$184,534	\$199,521	\$219,000	\$251,999	\$229,899	\$232,338	\$200,005	\$239,515	\$238,338	\$262,313	\$266,133

Victoria's parks and waterways attract 98.5 million visitors each year. Of these visits, 53.8 million are to parks and 44.6 million are to piers and jetties around the bays.¹³ Tourists spend \$2.1 billion per year associated with their visits to parks, and add 20,400 jobs to the State's economy, including many regional jobs.¹⁴ Nature-based visitors spent an estimated \$11.5 billion in Victoria in 2016-2017.

National parks also provide a raft of environmental services (pollination, clean water and fresh air, as well as protection from flood and coastal inundation) worth many hundreds of millions of dollars each year.¹⁵

Parks are undeniably popular; various polls consistently show that over 70% of people support Victoria having a comprehensive network of national parks and conservation reserves across land and sea.¹⁶

¹³ <https://www.parks.vic.gov.au/about-us/what-we-manage>

¹⁴ Parks Victoria, Annual Report, 2016-2017

¹⁵ http://parkweb.vic.gov.au/_data/assets/pdf_file/0008/666350/Valuing-Victorias-parks.pdf

¹⁶ <https://vnpa.org.au/campaigns/victorian-polling-results/>

There are many ways an increase in funding for parks (to at least 1% of the state budget) would benefit regional employment, including Indigenous employment. Most remarkably, few parks have dedicated staff with expertise in biology and ecology, despite a plethora of well qualified botanists, zoologists, mycologists, entomologists and ecologists ready to lend their expertise in park management.

4.1 Planning for, and managing access to, existing parks and reserves

As populations grow, and the demand for access to natural areas grows, we must manage that access well.

Areas of public parkland exist under a wide range of legislative obligations and policy prescriptions. But very few areas, mainly national and state parks, are actually legally required to have a management plan that covers visitor access. Nevertheless, all areas subject to significant levels of visitor use function better if a sensible planning process takes place. Unplanned parks can be subject to deterioration through informal roads and tracks, and conflicts between visitors. This can lead to increased management costs.

With careful planning and appropriate resourcing, parks and reserves can handle increased access while still protecting the landscapes, the native plants and animals and the cultural heritage that our parks are there to protect. People prefer to spend time in a park that is well-cared for.

Some guiding principles

1. Many parks have been reserved primarily to protect the natural environment (especially national parks and state parks). While visitor access is encouraged, it should be especially compatible with a high level of environmental protection.
2. Many parks are now subject to joint management under a settlement agreement with Traditional Owners, so management planning, including visitor access, is subject to a joint management process. Local Indigenous understanding should be included in reserve planning.
3. Many parks close to or within urban boundaries do not have high levels of environmental protection, but they can still contain valuable and highly vulnerable remnant natural areas, sometimes valuable to threatened species. This is commonly the case alongside rivers and streams. These areas, which are popular with visitors for many reasons, require especially careful management.
4. Significant infrastructure inside parks should be avoided, as commercial and other such developments tend to grow, and can impact both the visitor experience and the natural environment. Commercial developments should be constructed outside but adjacent to parks, including on private land whenever possible. This is particularly applicable to national parks.

5. Funding for park infrastructure (eg bike tracks, etc) should not be applied for in advance of a planning process. Funding that pre-empts decision is likely to be wasted, or lead to compromised management.
6. Well planned access to parks should improve the visitor experience. This might involve canoe launch jetties to protect streamside vegetation, and good separation of well-planned walking and bike tracks (shared walk/bike tracks don't suit either the walker or biker!)



Walkers forced off the Capital City walk/bike track through Royal Park. Combined walk/bike paths generally suit neither walkers nor bike riders.

7. Visitor education for natural and cultural heritage (and recreational opportunities) can contribute to visitor enjoyment, as well as encouraging support for looking after a park. This might be through signage, a ranger presence, digital platforms, local media, holiday activities and citizen science programs.
8. Tracks, signage and other essential visitor infrastructure should be well-maintained. This contributes to enjoyment and reduces any likelihood of vandalism. A park that is well-maintained gets the respect and co-operation of visitors.



Inadequate protection and damaged signage for a revegetation area at Warrandyte State Park.

9. Involvement of local communities in caring for parks should be encouraged. There is a long tradition of this with, for example, the hundreds of “Friends” groups active in parks across Victoria.

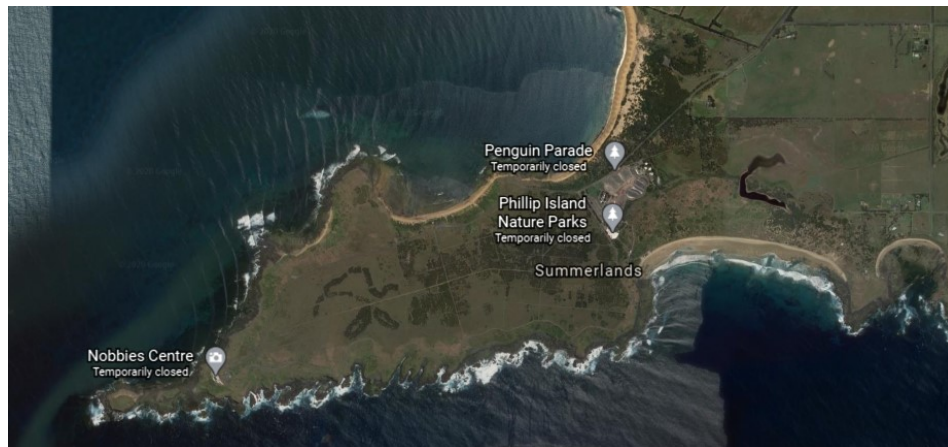
In the recent past, there have been some excellent examples of visitor access strategies, a number of ineffective strategies, and in many cases, a complete absence of strategic visitor planning. Poor planning doesn’t help visitors or the areas involved.

Two good models for a visitor access strategy

1/ Perhaps the best visitor access strategy in recent years has been the recently developed draft ***Camping and Access Strategy for Lake Tyers (Bung Yarnda) State Park***, jointly prepared by the Gunnaikurnai Land and Waters Aboriginal Corporation (GLAWAC) together with Parks Victoria. Rather than aiming at a compromise between visitor access and environmental and cultural protection, it aims at a high level of success for both access and protection. See: <https://engage.vic.gov.au/lake-tyers-strategy>

Over the years, indeed long before the area was given protection as a state park, a number of informal roads and tracks had appeared, many of them in places where they affected sensitive natural areas or Aboriginal cultural sites. And as visitor numbers grew, foreshore areas were being eroded, while facilities as basic as toilets were few and far between. The draft flags closing some roads (eg where cars drive over vulnerable coastal salt flats), but improves access and facilities for other areas. While implementation will require some initial funding, it should save management costs in the long term. More at: <https://vnpa.org.au/bung-yarnda-lake-tyers-visitor-plan-paves-the-way/>

2/ While not a part of formal reserves system another excellent model, though an operation at a scale not likely to be necessary generally, is the reclamation of the **Penguin Parade on Phillip Island**. In 1985 it was decided to buy back houses and land set aside for housing developments, to protect nesting sites for Little Penguins and Short-tailed Shearwaters. It also protected the general ambience of the Nobbies/Summerland beach area of Philip Island, which was becoming a popular tourist attraction. This buy back was completed by 2010, and followed by a \$3.4 million habitat restoration program. Costs involved have more than reaped their reward in economic terms, visitor approval and in the protection of flora and fauna.



Houses and land between the Nobbies and Summerland beach, and immediately behind the beach, were purchased and revegetated to protect wildlife and the visitor experience.

The extent to which developed land was reclaimed at Phillip Island was similarly achieved on the **Canadian side of the Niagara Falls**. Accommodation and 'attractions' had been constructed almost to the falls edge, but were reclaimed and revegetated in native Canadian plants, restoring good access for visitors and a much improved experience.

Some current access planning and management dilemmas

1/ A lack of public land planning processes outside national parks

When a planning process takes place for a park or parks (either by Parks Victoria or in a joint management process involving a Traditional Owner Group and Parks Victoria), there is no legal obligation or responsibility to include adjacent public land and/or private land in that planning process.

That can mean that anyone advocating for visitor infrastructure in the area only has access to a park planning process, even though the proposed infrastructure might be more appropriate in nearby state forest or other public or private land. Inappropriate proposals for high value conservation land might include hotel accommodation or a café.

Current government policy (and legal limits on commercial leases) make other land adjacent to parks a far better option for such infrastructure. See: <https://www.ecotourism.org.au/assets/Resources-Hub-Protected-Area-Management/tourism-leases-in-national-parks.pdf>

A recent example of this problem was a proposal for extensive accommodation in the area of Mount Buffalo National Park, adjacent to the holiday towns of Bright and Porepunkah in Victoria's north-east. Several years and large amounts of money were wasted discussing an inappropriate and unworkable proposal for a complex of hotels, spas and roller skating rinks in the national park. The proposal inevitably failed, but it might have been far more viable and had an easy passage through a planning process if it was available on nearby public land. Parks Victoria however has no capacity to make recommendations, let alone plan, for land it doesn't manage.

This situation is also evident with the development of mountain bike, trail bike and vehicle tracks in a range of parks in peri-urban and regional parks across Victoria. As above, the development of new tracks is best accomplished in a planning process that operates across all public and private land, so the best recreational, nature conservation and commercial objectives can be achieved across the landscape.

2/ Visitor numbers are growing rapidly

Park visitor numbers are growing across Victoria, and parks close to urban centres are facing especially rapid rises in visitor numbers. This can be due to better access to vehicles, informal social media promotion, and generally more interest in getting outdoors. Visitor infrastructure planning and implementation should anticipate realistic visitor projections, otherwise natural and cultural features and visitor enjoyment all suffer.



Cars lined up for a kilometre or more after carpark fill at Werribee Gorge State Park (70 km from Melbourne city centre). This is becoming common at many parks near Melbourne, such as Organ Pipes National Park (25 km from Melbourne city centre), and Dandenong Ranges National Park.

3/ A lack of respect for park planning can lead to unmanageable situations.

Importantly, in national parks and other high conservation value parks (or indeed any park or reserve), planning processes should precede development funding and/or grant applications. Currently, applications for the funding of infrastructure in parks can be made by a tourism authority or local municipality in advance of park planning processes, even though that council or organisation has no management authority or responsibility for the area involved. Once that funding has been secured, however, it inevitably skews any subsequent park planning process, often leading to poor decisions, and a considerable waste of time, money and energy for all involved.

This was the case for the Mount Buffalo National Park development proposal mentioned above, for an implemented but largely dysfunctional amphibious tour boat operation at Wilsons Promontory National Park, and a range of too-hastily proposed mountain bike tracks across the state.

4/ A chronic lack of management resources

Victoria's national parks and reserves receive less than 0.5% of the state budget annually – a completely inadequate funding allocation that leads to a lack of visitor satisfaction in many parks as well as an inability to reverse ecosystem decline across that state. This is also true of urban parks, which have never recovered from the redistribution of their MMBW funding back in the 1980s. Tourists spend \$1.4 billion a year visiting parks in Victoria, adding 14,000 jobs to the state's economy and our parks contain over one million hectares of catchments which supply water used for drinking, food production and other industries.

Victoria's parks contribute greatly to the economy each year, and increase the mental and physical health of Victorians, yet are largely starved of reliable management funding. It is time to give our parks the resources they need.

Recommendations:

- Increase funding for the core ecological management of Victoria's national parks to at least 1% of the state budget.
- Parks Victoria to substantially increase its staff expertise in biological and ecological fields, including (but not only) mycology and entomology
- Parks Victoria to increase public education in the role that national parks play, and their benefits to the community
- Implement state-wide park planning and management principles, to ensure natural areas are maintained while encouraging appropriate visitor access

5. Blue Infrastructure – “Blue Wedges” and coasts

The iconic bays and coasts of Melbourne – Port Phillip and Westernport, are a key piece of natural infrastructure, which is often neglected in open space planning. They are key play grounds for people and very important ecological assets for Victoria’s two largest cities, Melbourne and Geelong. They provide:

- play grounds for beach goers, fishers, sailors, divers and boaters
- they help dispose of waste, effluent, stormwater
- transport for cargo
- supports a tourism industry
- internationally significant wetlands
- provides natural defence barriers against sea level rise and storm surges
- a diverse range of marine species

All these uses can impact on the health of the bay and need to be managed cohesively – better management makes not just environmental sense but has real economic and social benefits. Although there have been many advances in cleaning up its waters over the years, there remain gaps in the management of marine values, which is reflective of Victoria’s entire marine environment.

- Port Phillip Bay is one of Victoria's most loved and popular recreational destinations, attracting more than 50 million visitors annually, including many from interstate and overseas.
- There are 135 beaches along the Bay coastline.
- Bay tourism and associated businesses contribute more than \$320 million per year to the economy.

Victorians value and enjoy the marine and coastal environment in a variety of ways – from walking, fishing, surfing and boating, to simply being on the coast. The extent to which we value it was demonstrated in the Wave 5 survey which looked at community attitudes about our marine and coastal environment as part of new Victorian Government Marine & Coastal Policy.

The survey results are clear – Victorians love and treasure their marine and coastal environment, which makes the responsibility to nurture it and protect it from the advancing impacts of climate change all the more important.

- 80% of Victorians said the marine and coastal environment was the State’s most important natural feature.
- 98% of Victorians reported a positive experience last time they visited the coast, remarking that picturesque scenery, clean water and the absence of litter were key to their enjoyment.

- A large majority – 77% – had visited the coast in the previous 12 months, with half of them staying overnight. More than a third made had more than five trips to the coast in the previous year.¹⁷

Parks Victoria manages around 70% of the Victorian coast as national or state parks, coastal reserve or marine national park or sanctuary. Coastal and marine habitats including mangrove, saltmarsh, seagrass and coastal dune systems can be described as ‘living infrastructure’ that provide important coastal protection services by absorbing wave energy, helping to minimise shoreline areas from storm damage, inundation and erosion. These ecosystems can provide highly cost effective natural buffers against incoming waves. By protecting against storm damage, flooding, and erosion, these habitats protect human populations and help mitigate economic loss of coastal assets.

Around 285 kilometres of the Victoria’s coastal habitats in parks are in and around coastal townships. The value of protecting mangrove, saltmarsh and dunes in parks along Victoria’s coast is conservatively estimated to avoid costs of \$24–56 million per year, based on the estimated replacement cost of a combination of seawall construction and revegetation if these coastal natural assets were severely degraded or lost.¹⁸

A recent Victorian Auditor-Generals Office (VAGO) report ‘Protecting Victoria’s Coastal Assets’¹⁹ (May 2018) tabled in the Victorian parliament reaffirms and highlights many of the issues around management of our coastal environments. It highlights various problems: that existing oversight is poor; there is lack of resources; and a lack of skills and capacity in government agencies, especially in the environment department (DELWP). The report concludes that: *“overall natural and built assets on Victoria’s coastline are not being adequately protected”*. <https://vnpa.org.au/auditor-general-shines-light-coastal-management/>

While problems persist across Victoria’s marine and coastal environment and there is lot of catch up to do, recent reforms are moving in the right direction.

The relatively recently released Port Phillip Bay Environmental Management Plan 2017–2027²⁰ is an important document for managing the Health of the Bay. The foreword summarises the current context well:

“While the Bay is currently in good condition, we cannot take its health for granted. Melbourne’s population will almost double in the next 35 years, and significant growth will occur in Geelong and other regional centres.

¹⁷ https://www.marineandcoasts.vic.gov.au/_data/assets/pdf_file/0028/456535/Executive-Summary_Marine-and-Coastal-Policy.pdf

¹⁸ Parks Victoria & DELWP Valuing Victoria’s Parks Accounting for ecosystems and valuing their benefits, Victorian Government 2016

¹⁹ <https://www.audit.vic.gov.au/sites/default/files/2018-03/20180329-Coastal-Assets.pdf>

²⁰ https://www.marineandcoasts.vic.gov.au/_data/assets/pdf_file/0024/88710/PPB-EMP-2017-Main-Doc.pdf

Combined with the additional pressures of climate change, it will be a challenge to ensure the Bay remains healthy”

The PPB Environmental Management Plan along with the [Port Phillip and Western Port Regional Catchment Strategy](#) are key documents for managing natural assets across the catchment and within the Bays themselves. Much of the economic and recreational uses of these Blue Wedges have been developed in isolation or in policy silos and not sufficiently incorporated into the broader strategic planning framework for Metropolitan Melbourne such as Plan Melbourne. The new Marine Coastal Act and Marine Coastal Policy provide refreshed frameworks for protecting the marine environment and the bays.

While the implementation plan for Plan Melbourne include coastal hazard assessment (Action 87) and environmental protection for coastlines and waters of Port Phillip (Action 95), action is mostly reliant on the existing plan. It is rightly water quality focused, but there are gaps in terms of dealing with spatial uses of the bay and coasts.

The 2019 Progress report on the Implementation of Plan Melbourne states:

“The Port Phillip Bay Environmental Management Plan (EMP) includes priority actions to improve water quality and the environmental health of the bay. A delivery plan includes a schedule for actions and activities over the next 2 years, as well as monitoring, evaluation and reporting requirements. The Port Phillip Bay Fund has been established to deliver projects in partnership with interest groups and community organisations. The new Marine and Coastal Act 2018 now provides a mechanism to develop a comprehensive EMP for Westernport. The Healthy Waterways Strategy being delivered by Melbourne Water also represents a major contribution to the efforts to protect coastlines and waterways. Bay and Western Port”²¹

It is worth noting that progress has been made with new initiatives such as the State of the Bays Report <https://www.ces.vic.gov.au/sotb> and the State of Marine Environment Report, now being undertaken in Victoria. The first ever State of the Bay report in 2016 notes:

“While much is being done to conserve the health of the bays, population growth and climate change will put increasing pressure on their environmental assets..”

These are important steps; however the Port Phillip Bay fund mentioned in the Plan Melbourne 2019 Progress report is now finished, with no clear next steps. The fund has created and improved capacity for a range of organisations, particularly for marine

²¹ Page 41 https://www.planmelbourne.vic.gov.au/__data/assets/pdf_file/0003/516171/Report-on-Progress-2019.pdf

citizen science, but this is now in jeopardy as there is no replacement government funding stream.

The New Marine and Coastal Act 2018 provides some important new tools such as the capacity to develop marine spatial planning frameworks. The Act also requires a Marine and Coastal Policy (the Policy) to set out policies for planning and managing the marine and coastal environment, and to provide guidance to decision makers in achieving the Act's objectives.²² The Policy will be accompanied by a Marine and Coastal Strategy (the Strategy), which will outline priority actions to achieve the Policy. The new strategy is still under development.

Table 1: Documents and decision making under the *Marine and Coastal Act 2018*

Documents / decision making under the <i>Marine and Coastal Act 2018</i>	Purpose	Applies to
Marine and Coastal Policy	Long-term policy guidance.	Marine and coastal environment (including all public and private land)
Marine and Coastal Strategy	Actions to achieve policy.	
Regional and Strategic Partnership (RASP)	Produce a product to respond to an identified regional issue affecting the marine and coastal environment.	
Environmental Management Plans	Actions to improve water quality, protect beneficial uses and address threats.	Marine environment
Coastal and Marine Management Plans	Translate marine and coastal policy and strategy to on-ground action.	Marine and coastal Crown land
Consent provisions for use and development on marine and coastal Crown land	Assess proposals against policy and strategy and ensure public values are protected.	

The policy provides important guidance on managing coastal settlements, risk reduction, recreation and tourism, coastal industries, buildings and structure and a range of other critical issues. The key test now is to ensure that the principles are well-incorporated into relevant statutory and strategic planning processes and that on-ground improvements are made.

5.1 The potential of Marine Spatial Planning

One important tool in the new Marine and Coastal Act requires the development of a state-wide Marine Spatial Planning Framework (MSP Framework) that provides a process for achieving integrated and coordinated planning and management of the marine environment.

²² <https://www.marineandcoasts.vic.gov.au/coastal-management/marine-and-coastal-policy>.

The Marine & Coastal policy outlines the rationale:

“The marine environment, in keeping with its legal status as Crown land, is managed to provide environmental, social, cultural and economic benefits to the people of Victoria.

Common uses of Victoria’s marine environment – such as fishing, boating, various other forms of recreation and shipping and tourism – are changing and expanding, and new industries and uses are developing. As use of the marine environment increases and diversifies, so too does the potential for conflict between uses and users over marine space or resources, and cumulative and synergistic pressures on marine ecosystems.

With some exceptions, the main focus of planning and management in the marine and coastal context has been on individual sectors or activities, with responsibility shared across government agencies and bodies. But with increasing use and pressures on the marine environment, better integration and coordination of our planning and management efforts is now needed across marine sectors. This will enable Victoria to prepare for, and balance, current and future uses of the marine environment, and ultimately support healthy and resilient marine ecosystems.”²³

Marine spatial planning

Marine spatial planning is a process designed to improve planning, management and governance of the marine environment, and the values and benefits it provides. It can have significant benefits including proactively identifying and reducing potential conflicts between uses, and between uses and natural values, and the protection of economic, social and cultural values linked to the marine environment.

It offers a systematic process for assessing where activities may be compatible or incompatible, and where activities (either individually or cumulatively) conflict with an area’s desired future.

The process of marine spatial planning:

- assesses current and future human activities, informing management options to achieve objectives for a given area
- is collaborative, with participation from all users, to inform decisions about sustainable and equitable use of marine resources and space
- is ecosystem-based, strategic and evidence-based
- is iterative and promotes adaptive management across sectors.

A marine plan is an output of the marine spatial planning process. It is a strategic document that provides the structure and direction for marine spatial management decisions in the area to which the plan applies.

While VNPA felt the new Act did not go far enough <https://vnpa.org.au/marine-coastal-milestone/> it is a significant improvement to managing our coastal and marine environments. While the new Act and Policy are now in place, there still persists a tendency towards making decisions in isolation (see below Case Study #1 – The March of the Spider Crabs at risk from policy silos). Blue Infrastructure plays an important role in the life of Victorians and should be given the same recognition as other natural infrastructure.

Recommendations:

The committee should recommend

- that a marine spatial plan be developed for Port Phillip and Westernport to guide future use of the bays.
- a replacement funding stream be developed for the Port Phillip Bay fund.

²³ Page 65 https://www.marineandcoasts.vic.gov.au/__data/assets/pdf_file/0027/456534/Marine-and-Coastal-Policy_Full.pdf

CASE Study #1 – The March of the Spider Crabs at risk from policy silos

This well-loved tourism drawcard, as featured by David Attenborough on Blue Planet II, occurs each year between the months of April-July, in Port Phillip bay and other places when the march of the spectacular spider crabs come in to the shallows to undertake their annual moulting, attracting thousands of visitors to witness this marine spectacle.

Unfortunately, the 2019/2020 spider crab migration events saw for the first time a sharp increase in intensity of crab catching from Rye and Blairgowrie piers, which until this time was unprecedented. The sheer volume of crab harvesting, combined with the nature of the fishing practices, and the high number of water users observing the crabs from above and below water, caused public health and safety, and environmental issues.

The 2020 event, saw a further escalation of crowds of people harvesting with nets, using chicken carcasses as bait, which littered the seafloor (80 within a small areas), damage to marine life, marine litter, crab pots being dropped on people in the water, and on marine life - all confined to a small area from a single section of pier.

This is causing significant public health, and safety, and environmental concern from audiences at the local, state, national and international level, and over the past months, has gained wide media coverage in [The Age](#), [Channel 9 News](#).

Rather than safeguarding this unique tourism drawcard, the Victorian Fisheries Authority is not adequately addressing the issue. Their proposed bag limit reduction from 30 to 15 crabs per day does not address or mitigate the concerns, and risks only further promoting the moulting season as a fishery, given the only recent emergence of intense harvesting. This could make the situation worse in future years.

There is also a high degree of public interest. The VNPA is working with the community groups Spider Crab Alliance and Spider Crab Melbourne, also known as SOS #SaveOurSpiderCrabs, representing divers, fishers, educators, scientists, other water users, and concerned community members to garner local and broader support from the community, Councils, conservation groups, tourism and fishing bodies, and local businesses. We have also had positive feedback from local members and council on this issue.

Given the potentially high tourism value of the spider crabs, and given the hardships faced due to Covid-19, by local tourism operators there is great value in protecting such an important tourism drawcard to Victoria's economy.

The responsibility for management of crab harvesting sits with the Minister for Fishing and Boating, and the Victorian Fisheries Management Authority (VFA), however the marine and coastal policy recognises the need to protect migratory species at critical life stages, for example, (*page 24*) "native and migratory species at a critical stage of their life cycle." In relation to access of marine and coastal crown land (*page 55*) "minimise risk to public safety; protect cultural values; protect natural values and habitats at critical life stages (such as for migratory and nesting shorebirds)."

With regard to recreation and tourism, the policy also states the need to "minimise impacts on environmental and cultural values; minimise impacts on other users; maintain public safety; respond to the carrying capacity of the site", which is very relevant to the circumstances experienced during the 2020 event.

VNPA and community groups are seeking a seasonal no-take period during the annual spider crab moulting season between the months of April – July, to protect this important and globally recognised natural event.

This case study highlights that even with new legal framework for the marine environment and new policies, the sectorial approach to marine management still persists.

4.2 Coasts & Beaches

In 2014, VNPA undertook a detailed state-wide analysis of coastal issues – the full report a Coast is Unclear can be found here <https://vnpa.org.au/the-coast-is-unclear/>

It made a number of recommendations about improving the protection of coastal and wetland communities around Port Phillip and Westernport Bays, including Geelong and Bellarine Peninsula.

- Create the Geelong and Bellarine Wetlands State Park to ensure wetland remnants of Geelong and Bellarine Peninsula are protected, including Lake Connewarre between Breamlea and Point Lonsdale
- Create the Port Phillip Wetlands State Park to give stronger protection to Ramsar sites between Limeburners Bay and Jawbone Flora and Fauna Reserve
- Protection of Moolap Wetland at Geelong
- Establish a North Westernport Coastal Park from Quail Island to Tooradin and the Reef Island Bas River Coastal Park

Protection of Moolap Wetlands, Geelong

The Moolap coastal wetlands are located between the Geelong CBD and Point Henry, where Alcoa has recently closed its aluminium smelter. They are critical habitat for many thousands of international migratory and local birds, and could become a wonderful conservation and recreational space in a rapidly growing Geelong.

Our vision for the Moolap Planning Area is of an internationally important conservation and ecotourism area on Geelong's doorstep that protects migratory birds, improves the health of Corio Bay, reconnects people with nature and supports ecologically sustainable coastal land. If Victoria can get the planning right at Moolap, the Moolap Planning Area can serve as:

- an environmental corridor and link along the Corio Bay foreshore and between central Geelong and the Bellarine Peninsula
- a buffer between coastal and residential areas while providing protection for important biodiversity values
- a catalyst for longer-term and landscape-scale restoration across the Bellarine Peninsula and around Corio Bay.

The following link is our submission to the draft Moolap Coastal Strategic Framework Plan released on 19 April 2017. <https://vnpa.org.au/publications/draft-moolap-coastal-strategic-framework-plan/>. There does not seem to have been any additional public information about the progress of planning at Moolap since 2017.

Geelong and Bellarine Wetlands State Park

The following extracts from Coast is Unclear (page 82-89) describes the value of Lake Connewarre Wetland and recommendations about a Geelong and Bellarine Wetlands State Park. Lake Connewarre is currently a State Game Reserve with one of its main uses

being duck shooting, which is increasingly incompatible with the rapidly growing surrounding urban centres such as Armstrong Creek, Leopold, Ocean Grove.

Extracts for Coasts of Unclear regarding Lake Connewarre <https://vnpa.org.au/the-coast-is-unclear/>

Lake Connewarre wetlands

Between Breamlea and Point Lonsdale, a patchy strip of Dune Scrub/Coastal Dune Grassland Mosaic continues backed by Coastal Alkaline Scrub and cleared land. The large and relatively undisturbed estuary and coastal lagoon at Lake Connewarre and the Barwon River have one of the most diverse saltmarsh areas in Australia—the flora is of national significance. Several vegetation communities, such as silky wilsonia *Wilsonia humilis* herbland and Australian salt-grass *Distichlis distichophylla* grassland, are rare elsewhere in Victoria.

There is extensive brackish/freshwater swamp at Reedy Lake and coastal moonah along the Barwon River. Here also is the southern range limit for glasswort *Tecticornia halocnemoides* and tangled lignum *Muehlenbeckia florulenta*. Other significant plant species include coast bitter-bush and tiny arrowgrass. The fauna at this Ramsar site is of international significance, important for waders and waterbirds and critical for the wintering orange-bellied parrot.

The Reedy Lake–Lake Connewarre complex is part of the Port Phillip and Bellarine Peninsula Ramsar site. Threats include invasive species such as *Spartina* spp. and spiny rush *Juncus acutus*, which is also found at Thompsons Creek to Thirteenth Beach and in Murtnaghurt Lagoon, Lonsdale Lakes and Swan Bay. Rabbits, foxes, cats and carp, water extraction from catchments and the expansion of Geelong and Barwon Heads are also threatening the system, while drainage for pasture establishment, and some landfill, has also affected margins of Lake Connewarre, Reedy Lake, Salt Swamp, the Barwon River and Murtnaghurt Lagoon.

Recommendation 6a Coast is Unclear

6a. Create the Geelong and Bellarine Wetlands State Park to ensure that the wetland remnants of Geelong and the Bellarine Peninsula are protected and conserved at a time when the Geelong region is experiencing rapid population growth and urban expansion, much of which will occur on the peninsula.

In the Lake Connewarre area, for example, the new park would assist the protection of Coastal Saltmarsh/Mangrove Shrubland Mosaic (E) and remnants of Coastal Alkaline Scrub (E), which are also scattered across the cleared land surrounding the reserve, and patches of Mangrove Shrubland (V) along the Barwon River, Plains Grassland (E with only 3% left and 2% in conservation reserves), Plains Grassy Woodland (E with only 38% left and just 20% in conservation reserves) and Grassy Woodland (E with only 7% left and 1% in conservation reserves) on the private land surrounding the reserve which is mostly zoned Farming Zone.

The Geelong and Bellarine Wetlands State Park would be created by integrating the following within one park (in separate parcels): Lake Connewarre Wildlife Reserve (the game reserve would be degazetted), including Reedy Lake, Hospital Swamp and Murtnaghurt Lagoon; Salt Lagoon–St Leonards Wildlife Reserve; Swan Bay–Edwards Point Wildlife Reserve; the Barwon River estuary; Sand Island (near Swan Island); Swan Island (see Recommendation 6e) Lonsdale Lakes Wildlife Reserve; Lakers Cutting; south-western shores of Swan Bay; Freshwater Lake; Thompson Creek and Karaaf Wetlands at Breamlea (Breamlea Flora and Fauna Reserve); the Geelong Saltworks at Moolap (see Recommendation 6c) and the Point Henry wetlands (see Recommendation 6d). Management of the new Geelong and Bellarine Wetlands State Park would also require:

- sufficient resources for Parks Victoria for management and to work with adjoining landholders, local municipalities and state government agencies to ensure that stormwater pollution, invasive species, urban encroachment and other threats are quickly resolved
- identification and formalisation of the new state park boundaries with appropriate fencing to ensure there is no encroachment from adjoining land uses
- prevention of unauthorised access
- restoration of native habitats.

Recommendations:

The committee consider a process to:

- create the Geelong and Bellarine Wetlands State Park
- create the Port Phillip Wetlands State Park to give stronger protection to Ramsar sites between Limeburners Bay and Jawbone Flora and Fauna Reserve
- better protect the Moolap Wetlands at Geelong
- establish a North Westernport Coastal Park from Quail Island to Tooradin and the Reef Island Bas River Coastal Park

4.3 The Role of Marine Protected Area and marine national parks & sanctuaries

Marine Protected Areas (MPAs) are a powerful spatial planning tool that aim to conserve marine biodiversity, ecosystems and ecological processes. The accepted international definition of a MPA is very broad, and MPAs can vary massively in scale, the level of protection, and the conservation benefits they provide

In Victoria, a mere 5.3% of coastal waters are protected in no-take areas. Although 10.6% of coastal waters (1,060km²) are contained within MPAs, half of this figure relies on the inclusion of six partially protected MPAs in South Gippsland that lack goals, objectives, management plans and systematic monitoring.

Victorias Marine National Parks & Sanctuaries



A 2010 review of Victoria's MPAs found that they did not meet the NRSMPA's key principles of comprehensiveness, adequacy and representativeness, while the Victorian Environment Assessment Council in 2017 concluded that the "existing system of no-take marine protected areas has some gaps in representation, and individual marine protected areas may not meet the adequacy criterion". And both the 2013 and 2018 Victorian State of the Environment reports highlighted the limited protection afforded by the current MPAs.

It is now 17 years since Victoria established what was the world's first highly protected network of marine national parks and sanctuaries. But as the years have passed it has become recognised as inadequate and other Australian jurisdictions have surpassed it. What's worse is that the Andrews Government has essentially put a policy ban around the establishment of new marine national parks.

The primary goal of Victoria's MPAs is to maintain biodiversity and ecological processes, yet Victoria has the smallest area of MPAs of all states and territories, and the second smallest area of no-take reserves behind the Northern Territory.

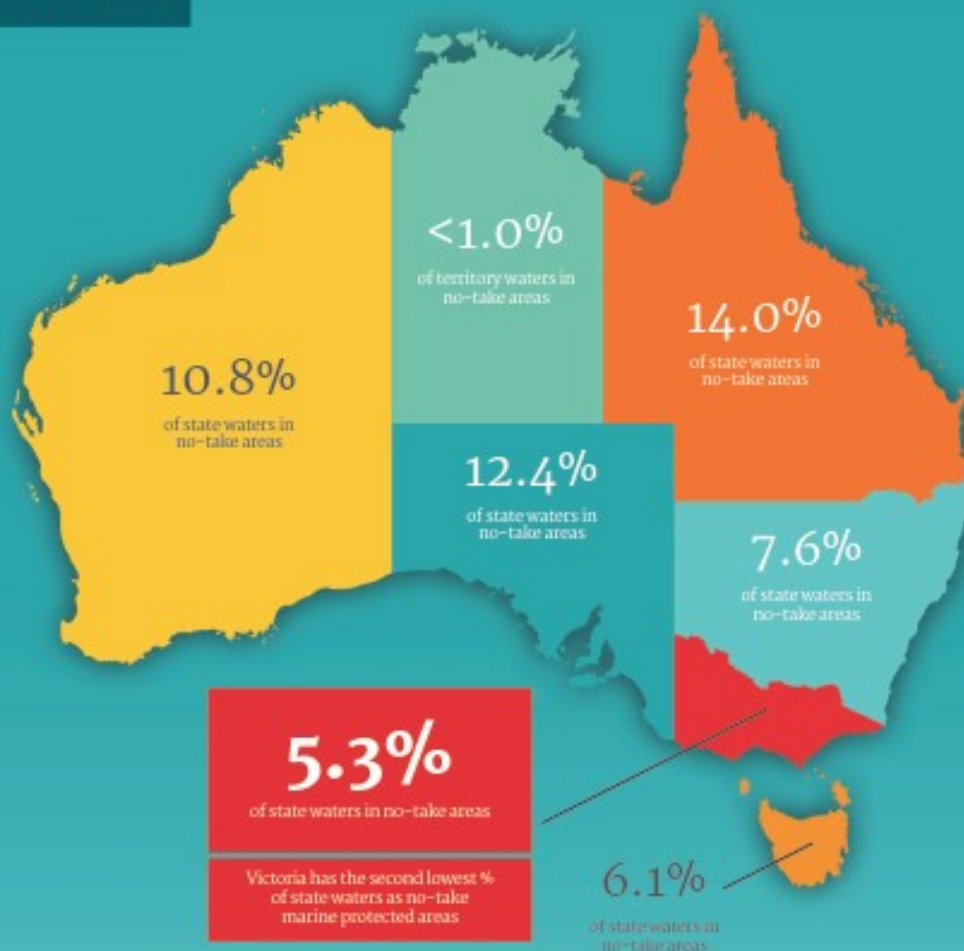
This report has identified the following key benefits of MPAs:

- MPAs are effective in stopping direct habitat destruction caused by mining, coastal development, dredging, and some fishing activities
- Well-managed no-take MPAs maintain higher adult abundances and larger sizes of some exploited organisms compared to areas open to exploitation.
- A large, well-established, well-enforced, no-take MPA with surrounding heavily fished or unregulated areas are likely to provide spill over benefits for exploited species
- MPAs deliver positive benefits to threatened species populations when the threatened species is at risk from activities that the MPA can regulate
- The biodiversity and habitat protection benefits provided by MPAs can increase the resistance (the capacity to withstand impacts) and resilience (the capacity to recover from impacts) to human-induced threats
- MPAs have the potential to be a conservation tool for climate change by: preventing carbon emissions from marine habitat loss, sequestering carbon through habitat repair, affect climatic interactions, conserving ecosystem integrity to resist invasive species favoured by climate change and provide a refuge for species and habitats

No-take MPAs are the most effective means of achieving the highest level of conservation benefits – the reason for their establishment – but they should be used within a suite of conservation and marine management measures, including marine spatial planning. In Victoria, barely 5% of its coastal waters are contained within MPAs that have clear conservation plans and objectives, leaving 95% of those waters without comprehensive protection.

Marine protected area (no-take) areas compared by state/territory

TOTAL
10.4%
of commonwealth
waters in no-take areas



Victoria has the second lowest %
of state waters as no-take
marine protected areas

No-take data taken from CAPAD 2016 (Australian Government Department of the Environment and Energy 2017), using IUCN categories I, II and III except for Commonwealth no-take areas which were sourced from Parks Australia shapefiles that reflect the 2015 Commonwealth management plan revisions (Australian Marine Parks 2015). If the Antarctic territories are included the coverage is lower at 8.5% no-take. Data on MPAs can vary from state to state, and can be difficult to determine comparability. For example, if the Macquarie Island MPAs (which are well away from the Tasmania mainland) are removed from the Tasmania figures, then the percentage of no-take area would be lower at 1.1%.

In 2010 our Nature Conservation Review: Marine Conservation Priorities and Issues for Victoria looked at the need to better protect Victoria's marine environment. It was carried out by Australian Marine Ecology, a scientific organization specializing in marine ecological research and consulting.

The review looked at critical habitats, values and threats right across Victoria's coastline. Key recommendations are outlined about habitats that warrant better protection and management. The assessment found large gaps in our marine protected area system. <https://vnpa.org.au/publications/protecting-our-seas-shores/>

The report specially highlighted gaps in Central Victorian marine areas: while some areas were well protected, other such as deep reefs and offshore sediments off Mornington Peninsula were largely missing protection, along with the Western Port entrance, seagrass and shallow reef habitats. The assessment of adequacy for protection was mixed, with the entirety of some habitats included, such as in Point Addis MNP and Port Phillip Heads MNP, while others were missing, such as subtidal reefs in Marengo MS, and some patchy as at Eagle Rock MS.

Recommendations

More recently, the VNPA produced a detailed review of Marine Protected Areas in Victoria in 2018. The report *Marine Protected Area Review: A Review of the Benefits of Marine Protected Areas* focused on how Victoria is tracking towards international benchmarks. A link to the full report (also attached as an Appendix) is available here: <https://vnpa.org.au/marine-national-parks-and-sanctuaries/>. The report was completed by an independent marine scientist and made a series of recommendations based on the recommendations of this committee.

The committee made recommendations that:

- Victoria's MPAs be considered as a key conservation pillar in the current Victorian process of marine spatial planning
- An independent review, of current Victorian MPAs against the NRSMPA's key principles of comprehensiveness, adequacy and representativeness, as recommended by the Victorian Environmental Assessment Council's Statewide Assessment of Public Land Assessment, 2017.
- Review of the criteria for key factors in MPA success (see Table 7 in the report) using most recent literature, to better manage expectations around conservation benefits and outcomes, for use in Victorian MPAs. (Scoping for new MPAs in Victoria be underpinned by the above criteria and involve a review of previous scoping work conducted by VNPA to identify the gaps in marine protection).

VNPA's further recommendations are:

- that the Victorian Government remove the ban on new marine national parks, and create new marine national parks and sanctuaries

- that the Victorian government invest adequate funding into marine science and into management of our marine national parks and sanctuaries
- that the Victorian Government implement either the accepted or proposed recommendations from the Victorian Environment Assessment Council in relation to the planning and management of marine parks (the VEAC Coastal Reserves Assessment 2020, VEAC Public Lands Assessment 2017, and the VEAC Marine Investigation 2014).
