

17th March 2017

TO:-

Minister for Water - Hon Lisa Neville

CC. Minister for Energy, Environment and Climate Change - Hon Liliana (Lily) D'Ambrosio



Community Call for immediate review of Minister D' Ambrosio's decision to cease Yarra River Floodplain Rehabilitation within the Yellingbo Conservation Area.



This submission is endorsed by the following Community Groups:-

Healesville Environment Watch Inc.
Yarra Ranges Landcare Network Committee
Friends of Leadbeaters Possum, Inc.
Friends of the Helmeted Honey Eater Inc.
Friends of Hoddles Creek Inc.
Yarra River Keeper Association
Mt Toolebewong & District Landcare Group
Permaculture Yarra Valley Inc.
The Friends of Wright Forest
Fauna and Toolangi
Friends of Heathfield Creek Montrose
Friends of Water Race & Quinn Reserve Inc.
Montrose Upper Landcare Group
Monbulk Landcare Group
Friends of Sassafras Creek
Upper Yarra Landcare Group
Macclesfield Landcare group
Johns Hill Landcare Group
Friends of Kurth Kiln
Olinda Creek Landcare Group
Southern Dandenongs Landcare Group
Warburton Environment
Southern Ranges Environment Alliance representing:-
Friends of Cockatoo Creek
Friends of Gembrook Park
Say no to Ivy
Cardinia Catchment Landcare
Cardi Creek Kids
KANGA
Kalredy
Community Weed Alliance of the Dandenongs
Muddy Creek Catchment Group
Cardinia Reservoir Biodiversity Group
Hillside Action Group and Friends of Critchley Parker Jnr Reserve.

We request a meeting with the Minister as soon as possible to discuss the details of this submission and potential ways forward.

The Community requires evidence based consistent policy, strategy and strong action to ensure our riparian zones and waterways are environmentally healthy and provide amenity value for the long term. The land management practices exhibited in the following photos should have ceased long ago.



Photo within the Subject Area (Little Yarra River) showing that the primary means of stock access to the far paddock is by crossing the River.



NOTE:- These recent photos of uncontrolled stock access within the Yellingbo Conservation Area shows the clear need for strong action and substantial change in the management of Melbourne's Drinking Water Supply.

Summary of Community Concerns, Comments & Recommendations regarding the 19th January 2017 announcement from the State Government.

Minister D'Ambrosio's 10 metre width restriction on stream frontage revegetation must be withdrawn because:-

1. There is no scientific basis for singling out the north east riparian areas of the Yellingbo Conservation Area (YCA) for special restrictions in response to either bushfire risk or conservation values.
2. This new rule is not consistent with current State Government and Yarra Ranges Council policy, practice and objectives for Riparian Land Management. It also conflicts with the recommendations of the VEAC Investigation which the Government has adopted.
3. The decision preempts the results of the Ministers own Bushfire Risk Assessment Process announced in December 2016 and recently commenced.
4. We believe the decision was made without consulting:-
 - The Floodplain/Waterway Manager (Melbourne Water)
 - The State Government appointed planning authority for the Yellingbo Conservation Area. i.e. The Yellingbo Conservation Area Coordinating Committee (YCACC).
 - The relevant expertise within DELWP.
 - The traditional owners - The Wurundjeri People (See Wurundjeri Council letter of support - Appendix 12).
 - The numerous local Landcare Groups including those involved in Riparian Zone & Floodplain Rehabilitation.
 - The Friends of the Helmeted Honey Eater and Leadbeater Possum.
 - The Community.
5. Based on the science, a 10m or less vegetative buffer is completely inadequate for achieving any significant river health benefits, particularly for high order rivers such as the Yarra and Little Yarra that contribute to the supply of Melbourne's drinking water.
6. Our local scientists warn that the decision is bad news for the environment and sets a dangerous precedent.
<http://www.theage.com.au/technology/sci-tech/states-controversial-vegetation-policy-bad-news-for-environment-scientists-say-20170215-gudq4v.html>
7. The decision to continue grazing along our iconic Yarra River sends the wrong message as it locks in the acceptability of conscious streamside degradation and the pollution of Melbourne's drinking water, which is extracted further downstream at Yering for treatment.
8. The process for making this decision was non-compliant with the Heritage Rivers Act 1992.

Community Submission - Yellingbo Conservation Area (YCA)- March 2017

Background

On the 17th January 2017, the State Government released a press statement announcing that in the North East corner of the Yellingbo Conservation Area:-

- Revegetation will only occur to a **maximum** of 10 metres on each side of a waterway, in the streamside areas.
- Riparian management licences will be issued on an individual basis for a maximum ten years to replace grazing licences.

<http://www.premier.vic.gov.au/addressing-yellingbo-conservation-area-concerns>

http://www2.delwp.vic.gov.au/_data/assets/pdf_file/0022/12388/YellingboMap_subject_area.pdf

Furthermore in a letter to the Yellingbo Conservation Area Coordinating Committee Convenor dated the 16th January 2017 (See Appendix 4), the Minister for Energy, Environment and Climate Change, Lily D'Ambrosio in relation to riparian management licences wrote that "*Under these licences, grazing may be considered as a management tool to improve the quality of the riparian area.*" In this letter the Minister also referred to north east corner of the YCA as having "*generally lower conservation values.*"

Community Concerns, Comments and Recommendations regarding the 19th January 2017 announcement from the State Government to restrict riparian revegetation widths to 10 metres or less, and to allow grazing to continue on streamside public land, including riparian/floodplain land within declared Water Supply Protection Areas.

1. State Planning Policy Framework

The ≤ 10m revegetation restriction is not consistent with Clause 12.05-2 of the State Planning Policy Framework. The Yarra River Protection Objective of this Policy is to "*Maintain and enhance the natural landscape character of the Yarra River corridor in which the topography, waterway, banks and tree canopy are dominant features providing a highly valued, secluded, natural environment for the enjoyment of the public.*" Two Strategies under this policy are to (i) *strengthen the river's natural environment, heritage and overall health by "Protecting the river's riparian vegetation, natural riverbank topography and flood management capacity"* and (ii) *maintain a sense of place and landscape identity by "Retaining a dominant and consistent tree canopy along the river corridor and within its broader landscape setting."*

<http://planningschemes.dpcd.vic.gov.au/schemes/vpps>

2. Decision pre-empts Minister's own Community led Bushfire Risk Assessment Process.

On the 23rd November 2016 the Minister, Lily D' Ambrosio announced that a "*community led process to assess and manage bushfire risk in the Yellingbo Conservation Area*" would begin in December 2016. (See:- <https://284532a540b00726ab7e-ff7c063c60e1f1cafc9413f00ac5293c.ssl.cf4.rackcdn.com/wp-content/uploads/2016/11/161123-Bushfire-Risk-Assessment-Begins-For-Yellingbo.pdf>)

Before that process had even commenced let alone made any recommendations, it seems the Minister had apparently already made up her mind about these matters. We can only presume the Minister has been badly advised by inexperienced DELWP executives.

The 19th January decision calls into question the genuineness of the Minister's Nov.23 Bushfire Risk Assessment Process.

3. Failure to Consult with Community Environmental Groups; and Safer Together

The new 2015 Government Safer Together approach to reduce bushfire risk for both people and the environment involved tailored risk reduction strategies for the local context with local decision making. Under this approach the Government states that "The impacts of bushfire are best managed when we are all part of the decision making process." With this approach the government also committed to "*working with existing community networks to promote and support learning about fire and other hazards in the environment, all year round*".

Unfortunately there has been no government consultation about this 10 m Revegetation Restriction Decision with the Yarra /Dandenongs Community Environmental Groups & Networks. For those groups (such as the numerous land care groups) who are currently actively participating in Riparian Revegetation Programs, this decision came as a complete bolt out of the blue. And all this in the context of the Safer Together approach that states "*Our actions must also be appropriate for the local environment – building the resilience of our plants and animals and ecosystems.*" (See:- http://www.delwp.vic.gov.au/data/assets/pdf_file/0004/319531/DELWP_SaferTogether_FINAL_17Nov15.pdf)

4. Failure to Consult with the relevant Riparian Zone and Floodplain Manager - Melbourne Water

Melbourne Water is the caretaker of river health for the 8,400 kilometres of waterway in the Port Phillip and Westernport Region. "*As part of its role, Melbourne Water has a duty of care to establish and maintain riparian zones along all our waterways to improve waterway health*" (See Melbourne Water, 2013). They are the responsible Government Authority for matters relating to riparian planning. Our understanding is that they were not consulted about this decision.

5. Failure to Consult with the YCACC

The Yellingbo Conservation Area Co-ordinating Committee is the responsible planning authority for matters relating to the YCA. Our understanding is that they were not consulted about this decision.

6. Victorian Environment Assessment Council's Yellingbo Investigation Final Report undermined.

The ≤10m revegetation restriction along with potential for continued stock grazing on the Streamside Public Land is not consistent with the VEAC Yellingbo Investigation's Final Report which recommended *that domestic stock grazing be excluded along the Yarra River upstream of the existing Warramate Hills Nature Conservation Reserve (recommendation C1) and the lower Hoddles (recommendation C2) and the Little Yarra River Streamside Reserve (recommendation C7).*

(See Page 44, http://www.veac.vic.gov.au/documents/YellingboFINAL_REPORT-interactive-web.pdf)

The restriction is also not consistent with the VEAC's recommended overall approach which recognised that "*most of the remnant vegetation in the investigation area is on private land*" and that in order to achieve the desired ecological outcomes a "*collaborative crosstenure approach*" was the best way forward "*to improve conservation outcomes in fragmented landscapes*". Implicit in this approach was the desirability of revegetation to occur not only on the stream frontage public land (full width) but also on adjacent private land (e.g. for floodplain restoration works). Indeed many riparian areas within the investigation area have no Stream Frontage Public Land, hence riparian revegetation being only possible on private land.

7. Government Response to the VEAC's Yellingbo Investigation Final Report contradicted.

The ≤10m revegetation restriction along with potential for continued stock grazing on the Streamside Public Land is not consistent with the 2014 Victorian Government Response to the Victorian Environmental Assessment Council's Yellingbo Investigation Final Report that states:- "*To improve the biodiversity values of the riparian land and the health of the waterways, Government*

will aim grazing (sic) to phase out grazing of areas C1 and C2 by 30 September 2016, and all water frontage licences in the remaining areas (C3 to C8) will be phased out by 30 September 2018." (See Page 12, <http://www.veac.vic.gov.au/documents/Victorian-Government-Response-to-VEAC-Yellingbo-Investigation.pdf>)

The restriction is also not consistent with the Government's stated purpose for establishing a new area to be called the Yellingbo Conservation Area which was to support "a new approach to reverse habitat fragmentation and improve biodiversity".

8. Riparian Vegetation Minimum Width Recommendations:- The Science Ignored

A 2015 Review by Hansen et al. provides minimum width recommendations for riparian zones in Victoria for some common management objectives under a range of landscape contexts. The table below provides a summary of their minimum width recommendations for some common management objectives under a range of landscape contexts. All these objectives are applicable to the Yellingbo Conservation Area. Minimum vegetation widths of between 28 and 110 metres are recommended. The widest width becomes the minimum for multiple objectives.

Environmental context/ management objective	Land use intensity low	Land use intensity moderate	Land use intensity high	Lowland floodplain/ wetland systems	Steep catchments/ low-order streams
Improve water quality	20 high	29 high	38 high	29 moderate	38 moderate
Moderate stream temperatures	28 moderate	46 moderate	64 moderate	28 [†] moderate	28 moderate
Provide food and resources	30 moderate	50 moderate	70 moderate	30 [†] moderate	30 moderate
Improve terrestrial biodiversity	50 low	80 low	110 low	110 [†] low	50 low

[†]Width will relate to the lateral extent of hydrological influences, and thus, the actual minimum should reflect flood mapping (e.g. 1 in 30 year).

Minimum width recommendations for riparian management in Victoria, developed on the basis of existing primary width data, The level of confidence for each recommendation (high, moderate and low) is written below the width. All widths are in metres. From Hansen et al. 2015

Additionally a 2009 scientific literature review undertaken for Melbourne Water by Ecology Australia around the appropriate width of riparian setbacks suggests that a 10m or less buffer along significant waterways like the Yarra River and Little Yarra River is completely inadequate for achieving significant biodiversity values and river health benefits. The riparian setbacks described within this Report relate directly to their habitat value as a riparian corridor. This review estimated that for sensitive species "a setback of 50 metres+ is required to support habitat elements necessary to maintain their populations". Furthermore for species (known to be within the YCA) such as the Powerful Owl, Yellow-bellied Glider, Growling Grass Frog and the Swamp Skink the following setbacks were recommended:-

- Powerful owl - 250 metres
- Yellow-bellied glider - 200 metres
- Growling Grass Frog - 200 metres
- Swamp Skink - 100 metres

Although ostensibly written for greenfield sites it is instructive that Melbourne Water's 2013 Waterway Corridors Guidelines states that the "minimum required waterway corridor width varies dependant on stream order, which increases with distance downstream of headwater streams. Smaller waterways in the headwaters of catchments will have smaller riparian zone widths and large waterways in the downstream area of a catchment will have wider riparian zones. This ensures that waterway corridors are at an appropriate spatial scale for the size of the waterway in any given location. The minimum waterway corridor widths specified in these guidelines are based on "the best available science", and for 4th order streams and greater, such as the Yarra River, a 50 metre minimum set back on both banks is specified. (See:- Melbourne Water 2013)

Science indicates that the $\leq 10\text{m}$ revegetation restriction over such a large amount of Stream Frontage Public Land, will ensure that here the desired better environmental outcomes (which were the primary drivers of the Yellingbo Investigation and the primary objective of the Yellingbo Conservation Area concept/proposal), will be unable to be achieved. Furthermore, where minimum widths are not achieved there is a risk that works efforts will be mostly ineffectual over a long time frame. e.g. due to edge effects. (See report to DSE by Hansen et al. 2010. http://www.ccmaknowledgebase.vic.gov.au/resources/RiparianBuffers_Report_Hansenetal2010.pdf)

9. Riparian Vegetation Minimum Width Recommendations should reflect flood mapping.

To maintain floodplain function, riparian vegetation widths must encapsulate the connection to floodplain components. Hansen et al. 2015 recommend that minimum widths should reflect flood mapping. The Map below shows the chance of a flood event in terms of the Annual Exceedance Probability (AEP) method. (I.e. The 1% AEP flood extent mapped has a hundred to one chance of being exceeded in any year). The mapping indicates that areas around Yarra Junction are prone to riverine flooding of both the Yarra River and the Little Yarra River. This is reflected in the fact that these floodplain areas are covered by a *Land Subject to Inundation Overlay* (LSIO) under the Yarra Ranges Planning Scheme (See Appendix 10 for an example of the LSIO around Launching Place) As in Point 8 above it is again instructive that Melbourne Water's 2013 Waterway Corridors Guidelines in defining minimum standards for waterway corridor widths states that, "In situations where the standard waterway corridor width – as specified in these guidelines – is less than the width of the post development 1 in 100 year Average Recurrence Interval (ARI) flood extent, the waterway corridor will be extended to include the entire 100 year ARI flood extent". (See:- Melbourne Water 2013)



As can be seen a $\leq 10\text{m}$. revegetation restriction along the Yarra River and Little Yarra River in the Yarra Junction Area does not reflect this flood mapping in any way.

The importance of floodplain rehabilitation for multiple benefits such as Melbourne's water quality, stream health and wildlife habitat has long been recognized by scientists and previous state governments of all persuasions. This decision means an end to long running programs aimed at restoring the biological and ecological functioning/integrity of floodplains in this area.

10. Feasibility of fencing a $\leq 10\text{m}$ strip

Effective riparian rehabilitation usually involves fencing off the stream and revegetation by natural means or by planting. A $<10\text{ m}$ Restriction will create significant practical problems for fencing.

- Fencing this close to meandering rivers and creeks will involve frequent changes to the direction of fencing. This will increase the costs of fencing.
- Fencing this close to rivers and creeks with remnant vegetation including large trees often close to or on the bank will firstly be very difficult and secondly likely damage the existing remnant vegetation, defeating the purpose of the exercise.
- To minimise the risk of damage to fencing from floods (and river migration) the fence should be located well back from the main stream channel and flood prone areas (See http://www.depi.vic.gov.au/_data/assets/pdf_file/0007/303892/Riparian-fencing-in-flood-prone-areas-guidelines-low-res-June-2015.pdf) Fencing this close to rivers and creeks on a floodplain will increase the likelihood of fences encountering floods thereby increasing the likelihood of them being flood damaged.



Photo in the Subject Area (Little Yarra River) showing the practical problems of fencing close to a meandering and migrating river within a floodplain.

Narrow waterway corridors require higher levels of initial fencing costs and repair/maintenance costs.

11. Victorian Waterway Management Strategy compromised

The ≤10m revegetation restriction is not consistent with the *Victorian Waterway Management Strategy* (VWMS) which provides the overarching framework for government, in partnership with the community, to maintain and improve the condition of Victoria's Waterways. Within this Strategy is a framework to maintain and improve the environmental condition of priority public and private riparian land. Victorian Government investment in riparian land management is to be targeted to priority activities that are determined through a regional priority setting process. The Port Phillip and Western Port Catchment Management Authority's Regional Waterway Strategy has identified the Yellingbo Area including the north east corner as containing high value waterways. (See also Points 19 & 20)

The Governments objectives for maintaining and improving the environmental condition of priority public and private riparian land was to be achieved through voluntary and co-operative partnerships between landholders and Government, typically through waterway managers. The multiple benefits of this approach particularly for the provision of environmental values are now fundamentally compromised by the ≤10m revegetation restriction.

12. Controlled grazing is not beneficial for improved vegetation quality outcomes in the longer term.

In the 2016 publication "*Managing grazing on riparian land*", DELWP has identified 11 vegetation states for riparian areas. Apart from *Naturally Occurring Native Grassy* states which are not relevant here, **all other vegetation states require the exclusion of livestock in the long term in order to continuously improve the quality of vegetation.** Beneficial vegetation quality outcomes, from short to medium term grazing is permissible in only two of the 11 vegetation states namely *Originally Treed Native Grassy* sites and sites with a *Young Overstorey*.

For *Originally Treed Native Grassy* sites with no change in livestock grazing practices, the predicted outcome is that the site will remain *Native Grassy*. According to DELWP "*This outcome is less-than-ideal for sites that were originally treed, as grazing inhibits the establishment of indigenous woody species.*"

For *Young Overstorey* sites, beneficial outcomes from short to medium term grazing require initial livestock exclusion for at least two years in order to assist natural regeneration.

It should be noted that this document states that "**any fencing for regeneration should be at least two canopy widths from the base of the tree**" indicating that the minimum width of appropriate fencing for riparian regeneration involves significantly more width than the 10 metre government Revegetation Restriction.

(See: http://www.depi.vic.gov.au/data/assets/pdf_file/0010/342829/Riparian-grazing-guidelines-2nd-ed-Final-2016.pdf)

The statement from the Minister indicating that grazing can continue as a "management tool" under a riparian management licence if it is "improving the quality of the riparian area" is confusing and potentially misleading. It could lead to landholder perceptions that it is acceptable to install fencing at 10 metres (or less) and have free grazing on public land down to this point. The DELWP guidelines for grazing indicate that grazing is not beneficial in the long term for any riparian vegetation type within the Yellingbo Conservation Area

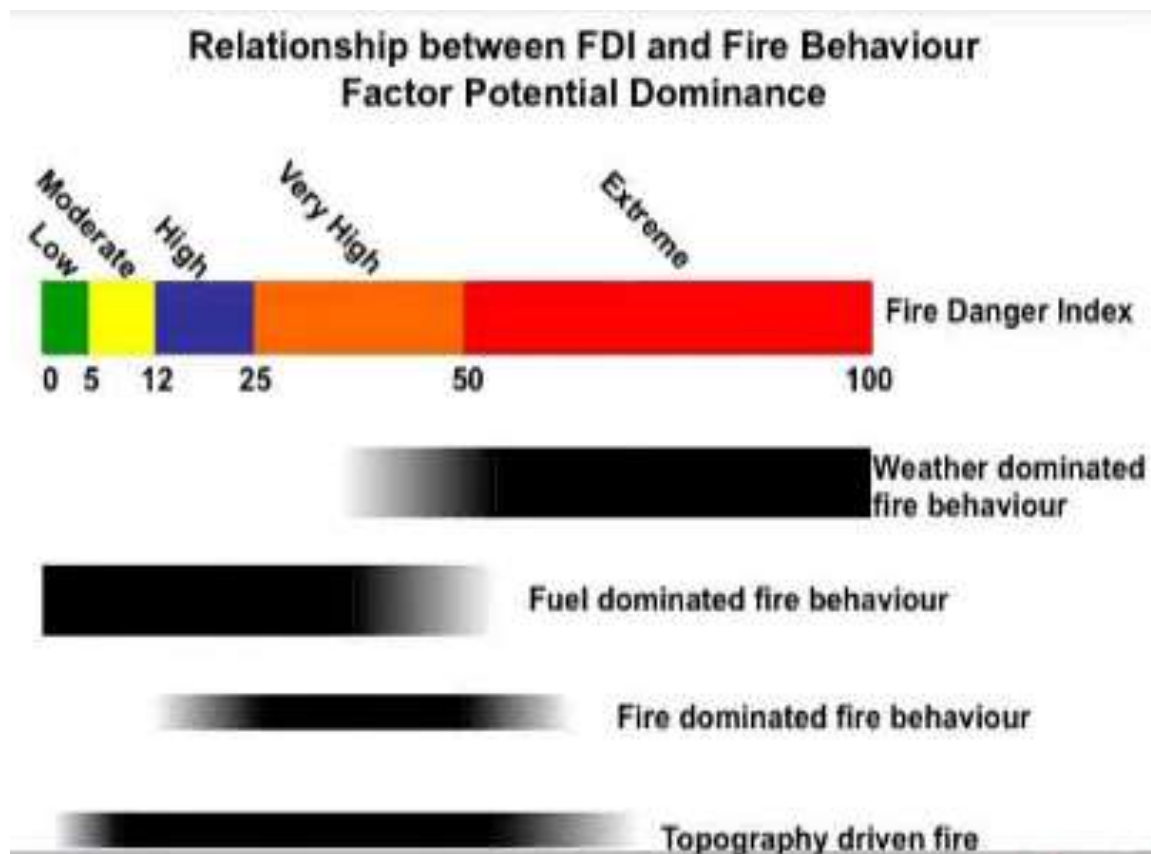
13. Bushfire Fatalities and House Loss closely correlates with proximity to Forest & Extreme Weather

In Australia fatalities & house loss from Bushfire has been dominated by a few bushfires that have occurred under catastrophic weather conditions (Blanchi 2013). In Australia between 1901 and 2011, 260 bushfires have been associated with a total of 825 civilian and fire fighter fatalities. Approx. two thirds of all fatalities have occurred in the State of Victoria.

- Fatalities & Forest:- 50% of all fatalities occurred less than 10m from the forest and 78% in less than 30m. (Blanchi et al. 2013)
- House Loss & Forest:- 60% of House Loss occurred within 30 metres of the forest. House loss involving fatal exposure is far more dominant in the 0-30 metres from forest regions (Blanchi et al. 2014)
- Fatalities and Weather:- Over 50% of all fatalities occurred on days where the McArthur Forest Fire Danger Index (FFDI) exceeded 100 proximal to the fatality (Blanchi et al. 2014)
- House Loss & Weather:- Approx. 64% of all house loss has occurred when the Forest Fire Danger Index (FFDI) has exceeded 100. More than 60% of house losses due to bushfire in Australia have occurred in Victoria with four major events. (Blanchi et al. 2010)

The Victorian Code of Practice for Bushfire Management on Public Land (2012) correctly identifies this small number of "major" bushfires as having caused the greatest loss, and mandates that the focus of effort should be on reducing the impact of these particular bushfire events (DSE 2012).

The following graphic from Tolhurst (2010) indicates that Fuel is not the dominant factor driving fire behaviour on days with an FDI above 50.



The conditions of (i) very close forest proximity to people & houses and (ii) extreme weather should be used as the basis for understanding the bushfire risk from riparian revegetation. Where there are houses situated within riparian areas, revegetation should not be situated close to them, because of the increased potential for impacts from direct flame and radiant heat, should the vegetation burn. Situations where this could be an issue in the subject area are few. Where it does apply, obviously appropriate revegetation restrictions should be put in place, but only at the scale of the individual house/property. A landscape scale blanket riparian revegetation restriction is completely unwarranted. It is also potentially counterproductive for reducing Landscape Scale Bushfire Risk, because of the inherent moisture retentive properties of riparian vegetation systems.

14. Current Bushfire Risk

The ≤10m revegetation restriction on the north east corner of the YCA is not an appropriate response to the bushfire risk in this area.

Appendix 1 shows that Bushfire Risk is generally lower in the riparian zones within the north east corner (Woori Yallock/Yarra Junction) of the Yellingbo Conservation Area (YCA) than in the riparian zones of the south west corner (Yellingbo/Monbulk/Emerald).

Appendix 2 shows the DELWP modelled Bushfire Impact Risk Map for the Yellingbo Area. **This map indicates that there is similar impact risk in the south west corner (Monbulk/ Emerald/ Cockatoo) of the Yellingbo Investigation Area as in the north east corner (Woori Yallock/Yarra Junction).**

The modelling used PHOENIX to simulate thousands of hypothetical bushfires starting individually on a 5 km systematic grid under extreme conditions, predicting their pathway. The Impact Risk is considered to be the number of properties that are impacted by the number of these hypothetical fires. It should be noted that this modelling does not take into account the likelihood of any of these hypothetical fires starting, assigning equal likelihood to all.

The Map in Appendix 3 shows from history that it is probable more fires will in reality be started in the south west corner of the Yellingbo Investigation Area than in the north east corner. The mapping also confirms that fires commencing in riparian areas are low compared with fires originating near landscape features such as roads and towns like Yarra Junction.

The Bushfire Risk data and modelling does not indicate that the riparian zones of the north east corner of the YCA should be singled out for the application of restrictions on crown land revegetation.

15. Change of Landscape Scale Bushfire Risk as a result of Riparian Revegetation is negligible.

The revegetation restriction on the north east corner of the YCA apparently results from concerns of the Minister about an increase in Bushfire Risk as a result of riparian revegetation. This concern is not supported by the Victorian Government's 2013 Waterway Management Strategy which states the following:-

- *Fire is "much less likely to start in riparian land than other parts of the landscape, typically because it is not as prone to lightning strikes, is remote from access to arsonists, has fuel too moist to burn and is sheltered from the wind and sun"*
- *That under extreme weather and drought conditions "all vegetation can burn. In these situations riparian land will have less influence on fire spread and impacts than the landscape level grass and forest fuels."*
- *That "under low to moderate danger conditions well managed riparian vegetation, with limited grass and weed growth, is less likely than pasture or crops to contribute to the spread of fire across a property or the wider landscape."*

The concern that revegetation of riparian land will increase the landscape scale bushfire risk is unwarranted because

- **Fire will spread more quickly in cured grass or crops compared with forest.**
- **Trees generally reduce wind speed. and**
- **Riparian land occupies a relatively small proportion of the broader landscape.**

(See:- VWMS 2013, http://www.depi.vic.gov.au/_data/assets/pdf_file/0017/200375/VWMS_Part3.pdf)

16. Climate Change:- Mitigated by riparian revegetation without increasing Bushfire risk.

Loss of tree cover has been correlated with lower rainfall in many areas of the world. Trees are also an important carbon sink as they lock up atmospheric carbon dioxide. Extending the tree cover in the Yarra Valley can therefore assist in the mitigation of climate change on both counts. The 10 m limit has apparently been imposed by Minister D'Ambrosio in response to the concern of landowners with properties adjoining the major streams; the concern being that revegetation of this public land will create an unacceptable increase in the frequency and impact of bushfire. As mentioned above there is ample evidence that the riparian vegetation types that would be restored are the relatively lowest risk types within the Yarra Ranges, their restoration therefore having little impact on the overall risk of bushfire to local Communities.

17. Conservation Values in the Subject Area are high and very significant.

The revegetation restriction on north east corner of the YCA is not an appropriate response to the conservation values of the riparian zones within the north east corner of the YCA. Generally the Conservation Values within the north east corner of the YCA are as high, if not higher, than elsewhere within the YCA.

Appendix 6 (Map C, VEAC, 2012) shows the native vegetation site condition in the Yellingbo Investigation Area. The maps indicate that the condition of native vegetation in the north east corner of the YCA is much the same as elsewhere within the YCA.

However the north east corner of the YCA contains native vegetation of higher Conservation Significance than many places elsewhere within the Area.

Indeed there are a number of specific sites of Botanical and Zoological Significance listed under the YRC Planning Scheme covered by this 10m revegetation restriction. For example **Site Z2** (Yarra River and Little Yarra River Corridor) is a site of Zoological Significance comprising the majority of the riparian zone covered by this revegetation restriction.

Appendix 7 shows State Government modelling (Nature Print - Strategic Natural Values) of the conservation value of the Yellingbo area. The Map indicates that the Conservation Value of riparian areas in the north east corner of the YCA are generally high (red, pink and dark green). They are typically much the same as areas along the Cockatoo Creek near Cockatoo and along the Sassafras and Emerald Creeks in the Monbulk/Sherbrooke Area.

Furthermore the very large width of the Floodplain of the Yarra River and Little Yarra River relative to the riparian areas in the rest of the YCA substantially increases the importance/significance of this area.

The scientific ecological evidence indicates that there is no basis for singling out the north east of the YCA for revegetation restrictions because of "generally lower conservation values". The general principle for determining riparian vegetation buffer widths is; the greater the land use intensity, the wider the riparian zone required to buffer against catchment modifications and disturbances. In summary - Wider is better (See Bennet, A.F. , 1999).

18. Riparian Zone/Floodplain Restoration is an ecological imperative.

In the Yarra Valley the well-drained stream banks are commonly and naturally clothed in Riparian woodland of the riverine form of Manna Gum, which likes access to water, but doesn't tolerate soggy soils. Much of this still remains. Further away from stream banks, floodplains with seasonally-flooded or poorly-drained soils were originally clothed with Swamp Gums, Paperbarks and Phragmites reeds. Many of these of these swampy vegetation associations have been cleared and drained for agriculture. This is the vegetation type that is critical habitat for the Lowland Leadbeater's Possum and Helmeted Honeyeater at Yellingbo.

Riparian areas along waterways play a significant role in river health. Environmental values and the health of waterway ecosystems, including their biodiversity, ecological functions, quality of water

and other uses depend on their environmental condition. Adequate riparian vegetation along waterway corridors and floodplains provide a range of river health functions, including:-

- Providing food, breeding and habitat features needed by a diverse range of wildlife species and aquatic organisms.
- Providing corridors that allow fauna to move up and down waterways, and enhancing links between remaining habitats that would otherwise remain fragmented.
- Stabilising channel banks against erosion.
- Providing shade and maintaining natural temperatures within waterways.
- Reducing sediments and pollutants that reach waterways through overland flow.
- Maintaining and improving water quality through filtering and nutrient cycling within the riparian zone and vegetated buffer zone.
- Allowing space for natural migration of the waterway channel, especially in areas with highly erosive soil types.
- Recruiting large wood structures into the stream and for riparian habitat over the long term.

Limiting revegetation of riparian corridors to 10 m will significantly impact floodplain restoration. It will restrict revegetation programs to the planting of Manna Gums where there are currently gaps along the banks only. Most cleared public land subject to grazing licences would have been covered with Swamp Gum/Mountain Swamp Gum and associated species.

To re-establish these plant communities, restoration of hydrology's reflecting earlier times also needs to be considered. Commencing in 2011 a number of "environmental flows" have been released from the reservoirs of the Upper Yarra including the Upper Yarra Dam. Riparian fencing and revegetation planning and design needs to consider the objectives and impacts of these releases to maximise environmental and amenity benefits.

Riparian corridors of Manna Gum uniformly 10 m wide would be unnatural and of very limited benefit to the threatened taxa that the Yellingbo Conservation Area project is designed to support. These species require the native vegetation & habitat of the much broader floodplains that occurs in the north east of the YCA.

Substantial Revegetation of the Floodplain on both public and private land is the first step that is required in order to reinstate the wetlands of the Yarra floodplains.

19. Water Quality Compromised.

Long running programs of Melbourne Water and the Port Phillip and Westernport Catchment Management Authority, are aimed at improving water quality through extending the stream-side vegetation, that can act as filters, and by excluding stock that damage stream banks and pollute water. The most effective way to improve water quality is to ensure that all agricultural and urban run-off is filtered through riparian zone & wetland vegetation and not discharged directly into streams.

The ≤10m restriction means that the banks of the rivers will not be able to be effectively revegetated with native vegetation in the longer term let alone the adjacent wetlands of the Yarra floodplains.

20. Melbourne Water's Stream Frontage Management Program and Healthy Waterways Strategy derailed:-

Melbourne Water has been running the very successful Stream Frontage Management Program in the subject area for over 20 years. The program provides assistance to private landholders to carry out work that will help improve the condition of a river or creek. Grants available under this scheme commence at a minimum of 10 metres width of revegetation from the top of the bank with higher contributions available for wider setbacks. A revegetation restriction of a maximum of 10 metres from the river itself means that not only will responsible private landowners be ineligible for funding under this scheme as it exists currently; they will also be prevented from revegetating the majority of the stream frontage and the floodplain.

The choice of the river water itself by the Minister as the position from where the proposed new setback will be measured indicates once again that she is being advised by inexperienced DELWP executives without consultation. Conventionally setbacks are measured from the top of the bank because water levels rise and fall. Under this change of setback definition by the Minister, it is now possible that not even the bank of the river will be able to be revegetated.

Melbourne Water's 2013 Healthy Waterways Strategy also identifies priority waterways within the Subject Area where key species or plant community values are present. A narrow streamside vegetation width will jeopardise efforts to protect or enhance habitat for these species, and this revegetation restriction has obviously not considered the scale of vegetation required to provide robust and self-sustaining riparian vegetation communities in this area over the long-term.

This new restriction sends an inappropriate message to landowners who have until recently been encouraged not only to participate in revegetation of crown land stream frontages but also to revegetate their own adjacent riparian/floodplain private land. Indeed many voluntary revegetation agreements between Melbourne Water and private landowners that were being finalised will now be shelved. This is very disturbing.

21. Yarra 4 Life Program Undermined

In 2013, the PPWCMA obtained an Australian Government grant to undertake the project 'Protecting and Connecting EPBC species (Helmeted Honeyeater and the lowland Leadbeater's Possum) in the Yarra Ranges'. This project was intended to build on previous environmental restoration works undertaken through their Yarra4Life program, but with a specific focus on these two threatened species. This project featured the development of an Ecological Character Description (ECD). An ECD is a conceptual planning tool that attempts to synthesise both scientific and practical sources of knowledge to capture the 'essence' or 'character' of a particular ecosystem (or species) to help guide its restoration. One outcome from this project has been the development of a spatial model to identify top priority areas to focus restoration actions. Appendix 5 show that the north east corner of YCA contains a significant amount of high priority area to be targeted for restoration works under the *Yarra4Life "Connecting EPBC species in the Yarra Valley Action Plan"*.

(For more info. see:- http://www.yarra4life.com.au/resources/docs/Y4Life_Action_Plan%20-%20FINAL.pdf)

The revegetation restriction means that the Y4L Action Plan can no longer be implemented in the Subject Area and will significantly compromise the overall program.

22. All Goals of the Yarra Ranges Council's Environment Strategy less able to be achieved

The revegetation restriction is not consistent with all 6 Goals of the Yarra Ranges Council's Environment Strategy. For example "*the protection and restoration of riparian zones*" is a key action supporting Goal 2 which is "Our water resource is improved and preserved".

(See:- https://www.yarraranges.vic.gov.au/files/assets/public/webdocuments/environment-engineering/parks-environment/environment-parks-environment/enviro_strategy_final_web.pdf)

23. Yarra Ranges Council's Environmental Significance Overlays Ignored

The revegetation restriction has been placed on Stream Frontage Public Land that under the Yarra Ranges Planning Scheme is covered by an Environmental Significance Overlay (ESO). The ESO plays "*an important role in contributing to the ecological processes and biodiversity of the region by forming core habitat areas within a complex network of wildlife corridors along roadsides and watercourses.*" Council's environmental objectives to be achieved under the ESO Schedule 1 include:-

- Ensure the long term protection of the wildlife habitat and other conservation values of sites of botanical and zoological significance
- Recognise the importance of sites of botanical and zoological significance as core habitat areas.
- Protect the natural resources and maintain the ecological processes and genetic diversity of the region.

See http://planning-schemes.delwp.vic.gov.au/schemes/yarraranges/ordinance/42_01s01_yran.pdf)

The Council applies an ESO when environmental values require stronger protection.

The revegetation restriction is in conflict with the environmental objectives of Yarra Ranges Council for the Stream Frontage Land covered by an ESO.

24. Water Supply Protection Areas:- The intent is for intact native riparian vegetation.

The ≤10 m. Revegetation Restriction is placed over land that has been proclaimed under the Waterways Act 1989 as a Water Supply Protection Area (WSPA). An area is declared to be a Water Supply Protection Area for the protection of the groundwater resources in the area or the surface water resources in the area or both. Two WSPA's cover a significant proportion of the North East Corner of the YCA. These are:-

(i) The Hoddles Creek WSPA and

https://www.melbournewater.com.au/waterdata/waterwaydiversionstatus/Documents/Hoddles-Creek-stream-flow_management-plan.pdf

(ii) The Little Yarra and Don Rivers WSPA

<https://www.melbournewater.com.au/waterdata/waterwaydiversionstatus/Documents/Little-Yarra-Don-stream-flow-management-plan.pdf>

See Appendix 8 and Appendix 9 to see the extent of these WSPA's within the north east corner of the YCA.

In accordance with the Water Act each of these WSPA's has a Stream Flow Management Plan (SFMP). The objective of each SFMP is to ensure the long term sustainability of the Water Resource. Each SFMP recognises the need to maintain and improve riparian vegetation to aid water quality and habitat creation. For example Schedule 2 of the Hoddles Creek SFMP states an objective to "*maintain remnants and rehabilitate degraded areas, of indigenous riparian vegetation along the banks of Hoddles Creek and its tributaries, and ensure adequate buffer strips between cleared land.*"

This 10m revegetation restriction effectively obstructs the State's Water Agencies and Land Management Agencies from meeting their legislated responsibilities.

25. Declared Heritage River Corridor status under the Heritage Rivers Act 1992 disregarded.

The Yarra River between Warburton and Warrandyte is listed as a Heritage River under the Heritage Rivers Act 1992 (See Appendix 11 for a plan of this Heritage River Corridor). The Act provides for the protection of public land in this part of the Yarra River Corridor because it has significant nature conservation, recreation, scenic or cultural heritage attributes.

Melbourne Water is a Lead Agency/Managing Authority for this Heritage River Corridor.

Under the Act the Managing Authority must:-

- Take all reasonable steps to ensure that the significant nature conservation, recreation, scenic or cultural heritage attributes of the area are protected.
- Take all reasonable steps to ensure that the area is maintained in an essentially natural condition.

As mentioned at the start of this submission (Point 1) the State's Planning Policy Framework calls for strengthening the Yarra River's heritage by protecting the river's riparian vegetation, natural riverbank topography and flood management capacity. It also calls for **protecting and enhancing both terrestrial and aquatic habitats and their linkages along the river corridor**.

All reasonable steps to ensure that the heritage values of this listed section of the Yarra River have not been taken because as also mentioned previously (Point 4) a Lead Agency/Managing Authority (Melbourne Water) was not consulted about the restriction decision.

Furthermore Waterways are also an extremely important component of the landscape in terms of indigenous cultural heritage as reflected in the Aboriginal Heritage Act 2006 and Regulations 2007. These list the land within 200m of a named waterway as being 'culturally significant'. Protection and enhancement of riparian areas, can assist in the preservation (and in some cases enhancement) of cultural heritage values. It is understood that the local Traditional Owners, the Wurundjeri people were also not consulted about the restriction decision.

Minister D'Ambrosio's vegetation restriction decision shows little respect for the Heritage Values (including indigenous cultural heritage values) of the Yarra River in the Subject Area and must be reversed.

References:-

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Hansen B, Reich P, Lake PS and Cavagnaro T, 2010, Minimum width requirements for riparian zones to protect flowing waters and to conserve biodiversity: a review and recommendations - *With application to the State of Victoria*, School of Biological Sciences, Monash University. Report to the Office of Water, Department of Sustainability and Environment

Hansen, B. D., Reich, P., Cavagnaro, T. R. and Lake, P. S. (2015), Challenges in applying scientific evidence to width recommendations for riparian management in agricultural Australia. *Ecol Manag Restor*, 16: 50–57.

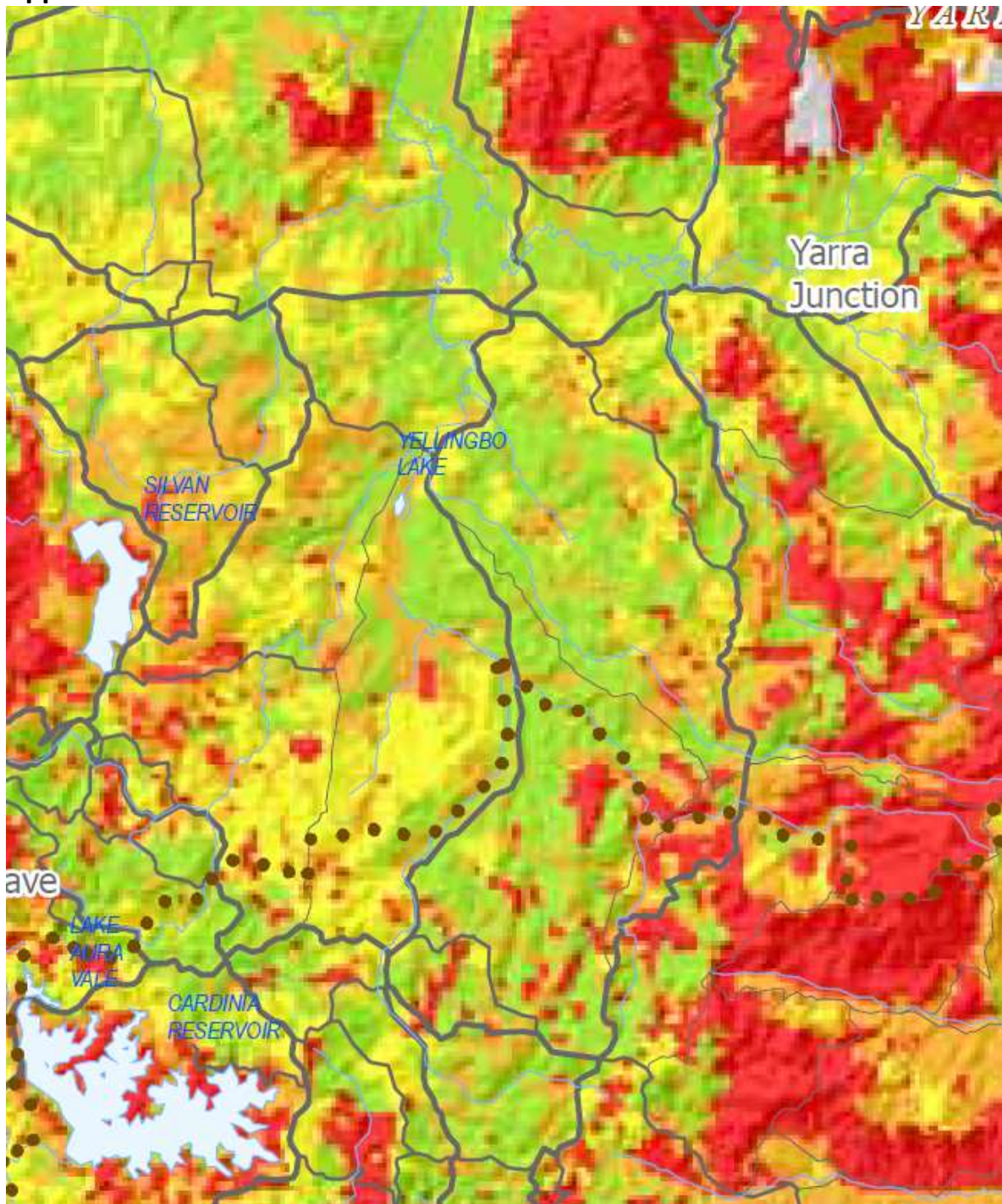
Melbourne Water, 2013:- Waterway Corridors - Guidelines for greenfield development areas within the Port Phillip and Westernport Region.

<https://www.melbournewater.com.au/Planning-and-building/Forms-guidelines-and-standard-drawings/Documents/Waterway-corridors-Greenfield-development-guidelines.pdf>

Tolhurst (2010) Notes from Bushfire planning and management course. University of Melbourne.

Note:- This submission was prepared by the Friends of Hoddles Creek Inc. in conjunction with the Groups listed as having given endorsement. Email:- friendsofhoddlescreek@gmail.com

Appendix 1:- Risk based on Fire behavior



Risk based on fire hazard

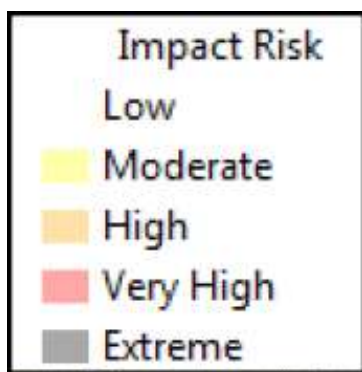
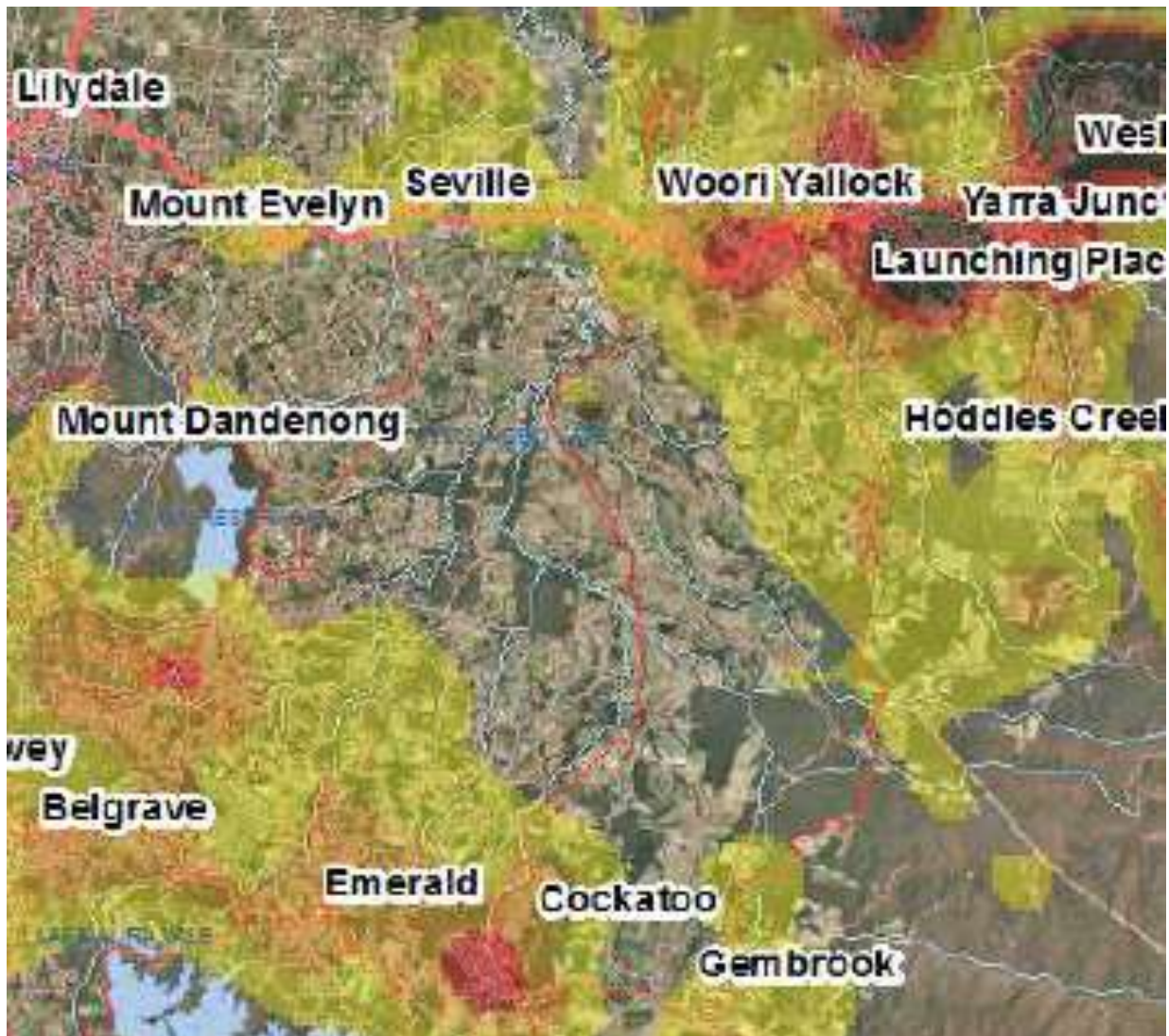
- Low
- Moderate
- High
- Extreme

DSE, 2011

<http://files.em.vic.gov.au/EMV-web/Eastern-Metro-Regional-Strategic-Fire-Management-Plan.pdf>

Note- Risk is generally higher in the riparian zones within the south west corner (Yellingbo/Monbulk/ Emerald) of the Yellingbo Conservation Area (YCA) than in the riparian zones within the North East corner of the YCA (Woori Yallock/Yarra Junction).

APPENDIX 2:- Bushfire Impact Risk, Yellingbo Area

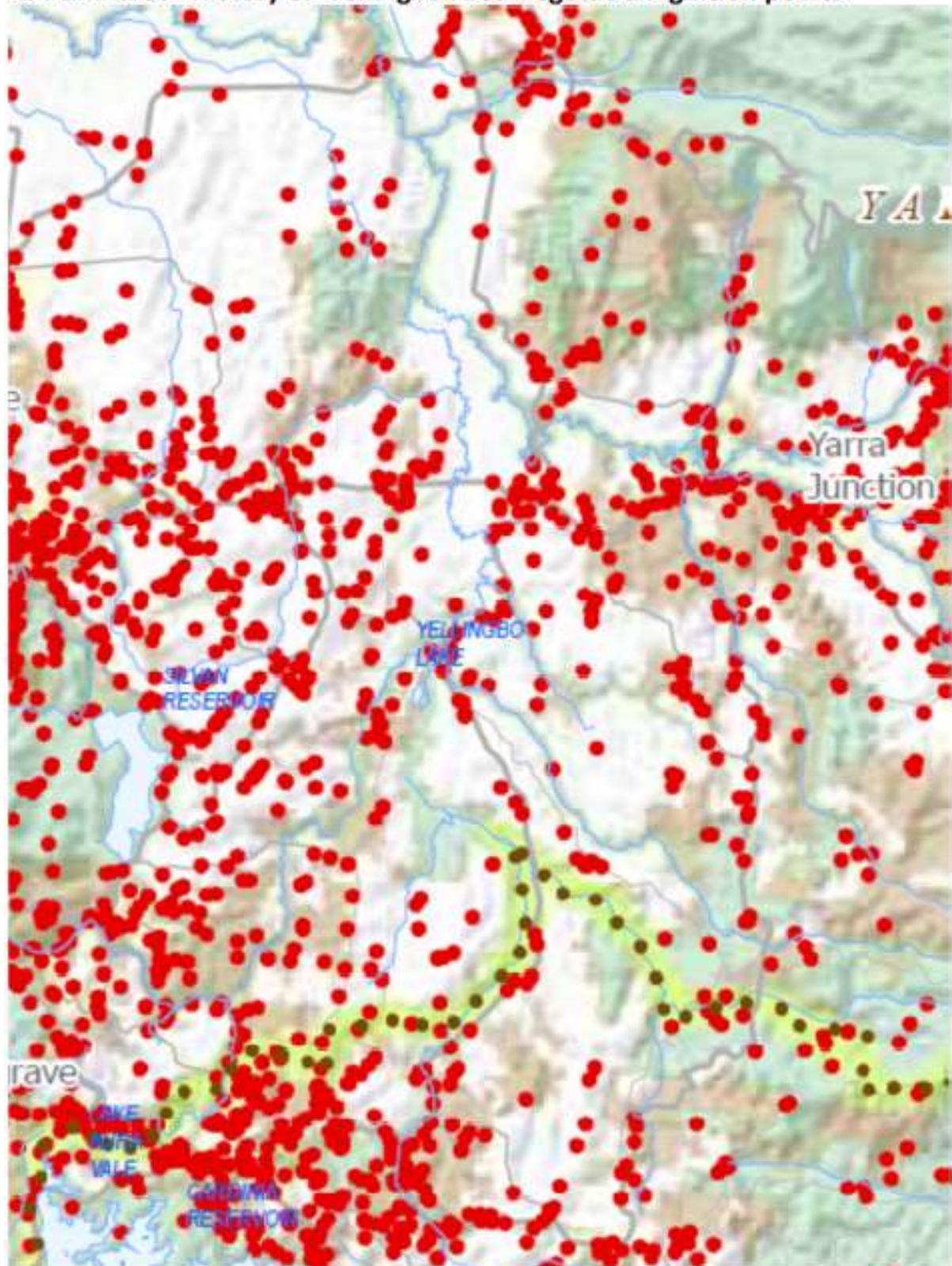


Bushfire Risk in East Central, DELWP - December 2015

Number of Houses * Number of Fires that Impact (Equal likelihood of Fires)

NOTE:- There is a similar impact risk in the south west corner (Monbulk/ Emerald/ Cockatoo) of the Yellingbo Conservation Area (YCA) as in the north east corner of the YCA (Woori Yallock/Yarra Junction)

APPENDIX 3:- History of Yellingbo Area Vegetation Ignition points



Vegetation Fire Ignition Points:- All recorded fires 1998 - 2010 (DSE, 2011)
<http://files.em.vic.gov.au/EMV-web/Eastern-Metro-Regional-Strategic-Fire-Management-Plan.pdf>

NOTE 1:- The data indicates that the likelihood of a fire starting in the south west corner of the Yellingbo Conservation Area is at least as high (if not higher) than in the north east corner. Note also that fires commencing in riparian areas are low compared with other landscape features such as roads and towns like Yarra Junction.

Appendix 4:- Letter to YCACC dated 16th January 2017



The Hon Lily D'Ambrosio MP
Minister for Energy, Environment and Climate Change
Minister for Suburban Development

121 Exhibition Street
Melbourne, Victoria 3000
Telephone: 03 8392 7100
DX210074

Anne Langworthy
Convenor
Yellingbo Conservation Area Coordinating Committee
5-9 Symes Road
WOORI YALLOCK VIC 3139

Ref: MIND21230


Dear Ms Langworthy

YELLINGBO CONSERVATION AREA

I would like to take this opportunity to thank you for your work with the Yellingbo Conservation Area Coordinating Committee (YCACC). In your short time in the role of convenor, I have been advised that you have taken to the role with a great deal of enthusiasm and have already held a planning day to clarify the role of the YCACC and develop a clear way forward in implementing the Yellingbo Conservation Area (YCA).

At our recent meeting, you requested that the membership of YCACC be expanded to include a representative from the Country Fire Authority. I am pleased to advise that I support this request and a representative of the Country Fire Authority has been appointed. I have also appointed an additional community representative who was nominated by Yarra Ranges Council.

Further to our recent discussions, I have received a request from Yarra Ranges Council to reduce the size of the Yellingbo Investigation Area to what was detailed in the proposed Terms of Reference for the Yellingbo Investigation, released for public comment on 22 June 2011. Council has raised concerns about government resourcing, the impact on adjoining landowners and fire management planning associated with the current scale of the area. This request has been supported by the Yarra Waterways Group and other local residents from Woori Yallock, Yarra Junction, Launching Place, Don Valley, Millgrove and Wesburn.

As the body responsible for coordinating the implementation of the Yellingbo Conservation Area, I would like to formally advise you that I do not support this request, and the size of the Yellingbo Investigation Area will remain as per the *Victorian Government Response to the Victorian Environment Assessment Council's (VEAC) Yellingbo Investigation Final Report March 2014*.

In response to the concerns raised by Council and the local community in the Upper Yarra Valley about the potential for bushfire risk to increase, the Government will not be undertaking any re-vegetation within the subject area identified on the attached map until the bushfire management planning process has been finalised. YCACC has collated information provided by Government agencies about the re-vegetation projects proposed to occur in 2017 so that I had an understanding about the scale of re-vegetation proposed and I thank you for this work. The re-vegetation proposed included projects within the existing Yellingbo Nature Conservation Reserve by Parks Victoria and the Friends of Helmeted Honeyeater and I am supportive of this work continuing in 2017. These works as



are not within the subject area and are part of a longer term strategy to support the recovery of two threatened species, the Helmeted Honeyeater and Lowland Leadbeaters Possum.

In the longer term, given the concerns of the local community about bushfire risk, the higher populations and generally lower conservation values, I have decided to limit the amount of re-vegetation that can occur on Crown land in the part of the YCA identified on the attached map as the 'subject area'. In the subject area, re-vegetation of Crown land will be restricted to a maximum of 10 meters from either side of the Yarra River and tributaries in the streamside areas. A lesser area will be re-vegetated if determined through bushfire management planning, to ensure that there is no material increase in bushfire risk and that priority is given to the protection of human life and private property.


This new restriction supports the considerable work already underway to better engage the broader community, and take on board the input of local communities in the management of the YCA, including Haining Farm. This includes the community bushfire management planning process and the broader concept planning, which will address matters such as pest and weed control, protection of priority habitat and permitted recreational use. Furthermore, it will complement the consultations underway with individual landholders to enable them to continue involvement in the management of the land through the taking up of a riparian management licence. Under these licences, grazing may be considered as a management tool to improve the quality of the riparian area.

As you are aware, the government has also set aside \$3.2 million to implement the Yellingbo Conservation Area. Funding for on ground works, including the Priority Weeds and Pests program, is now available for immediate implementation. Further information about the program is available at www.delwp.vic.gov.au.

I would appreciate if you could advise the members of YCACC of my gratitude for the work undertaken to date and of the action I have taken at your earliest convenience.

If you would like more information about this matter, please contact Victoria Purdue, Project Manager, Yellingbo Conservation Area, at the Department of Environment, Land, Water and Planning, on 0419 115 636, or by email to victoria.purdue@delwp.vic.gov.au.

Yours sincerely

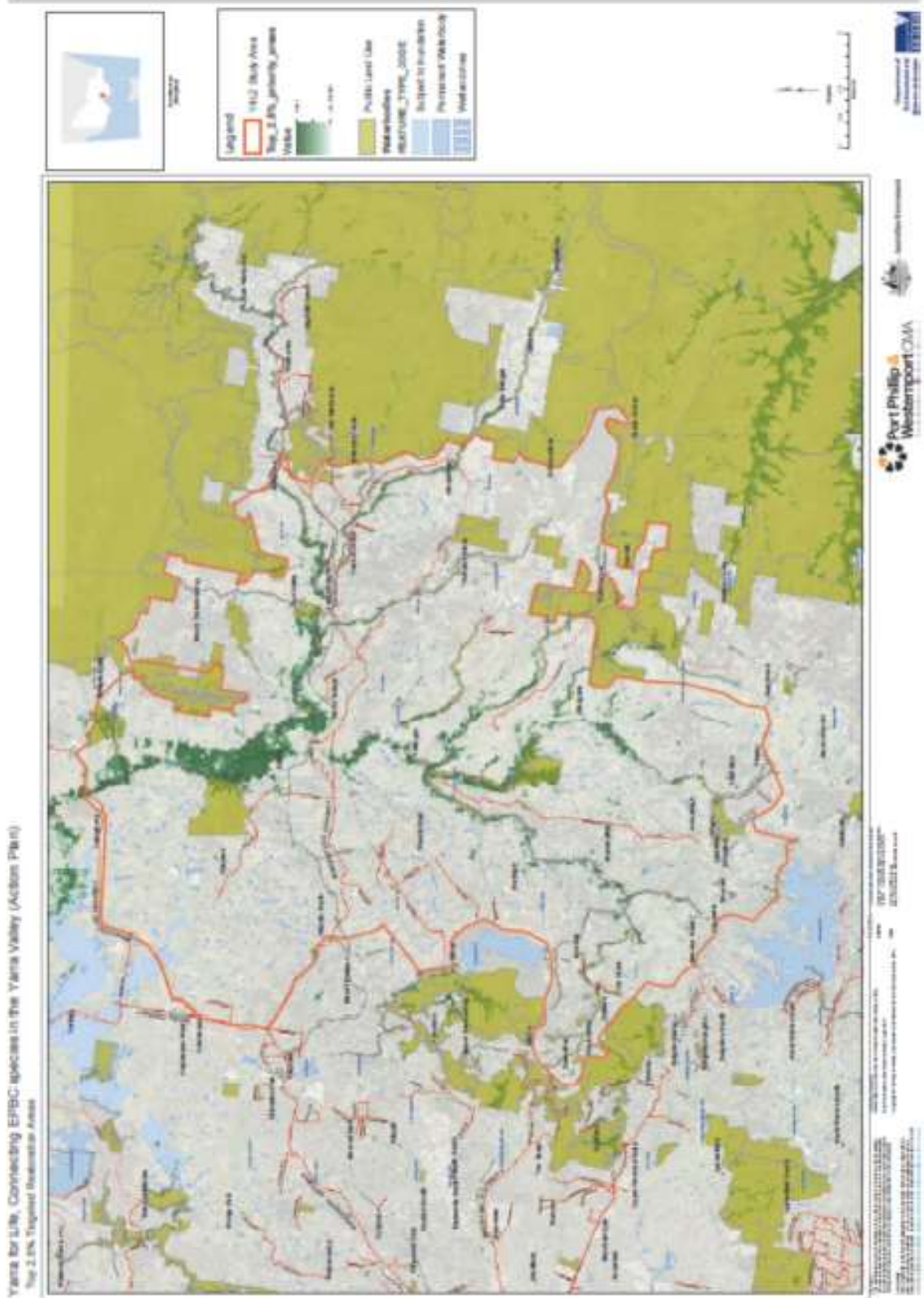


Hon Lily D'Ambrosio MP
Minister for Energy, Environment and Climate Change
Minister for Suburban Development

16/1/17

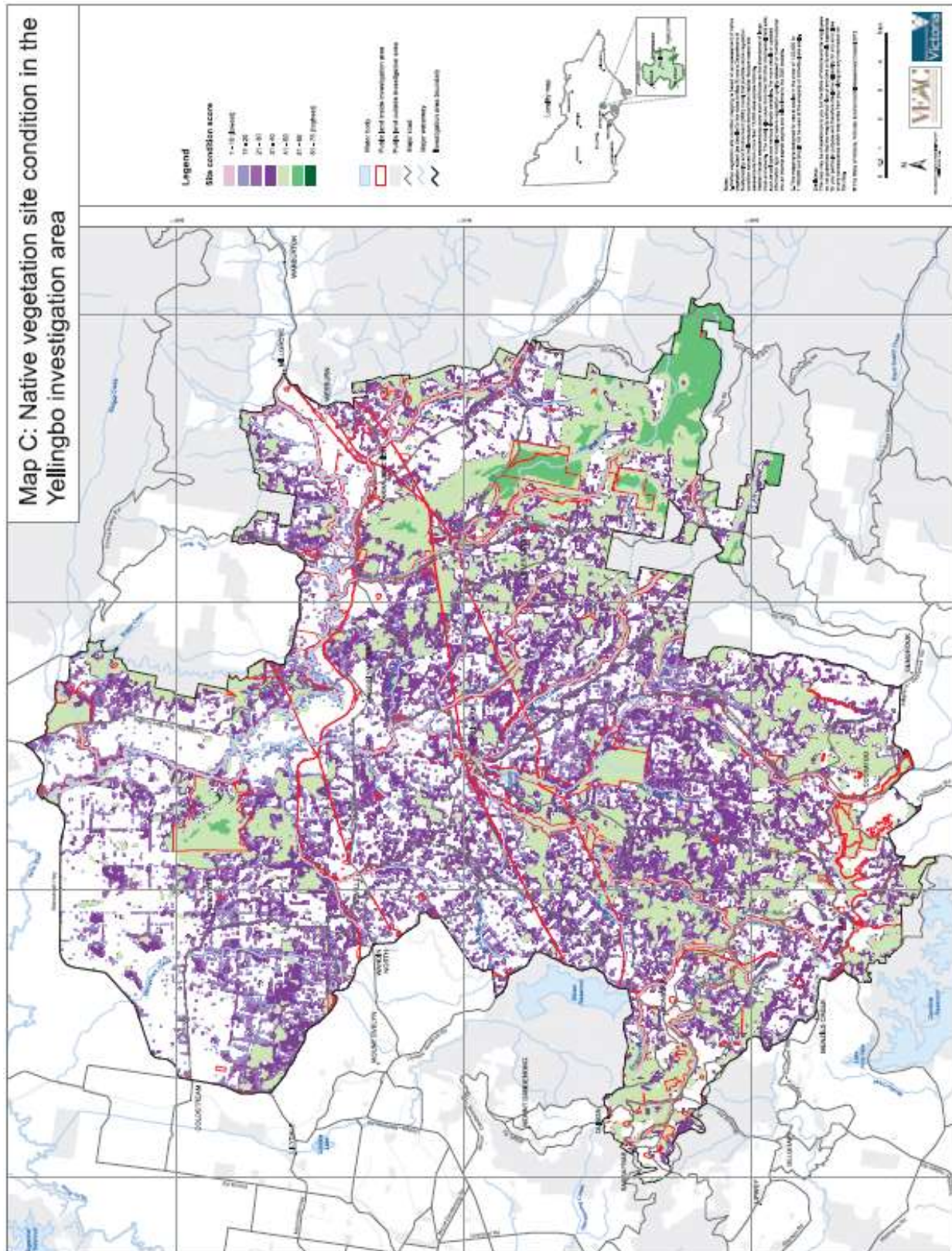
Encl.

APPENDIX 5:- PPWCMA Targeted Restoration Action Plan for Helmeted Honey Eater



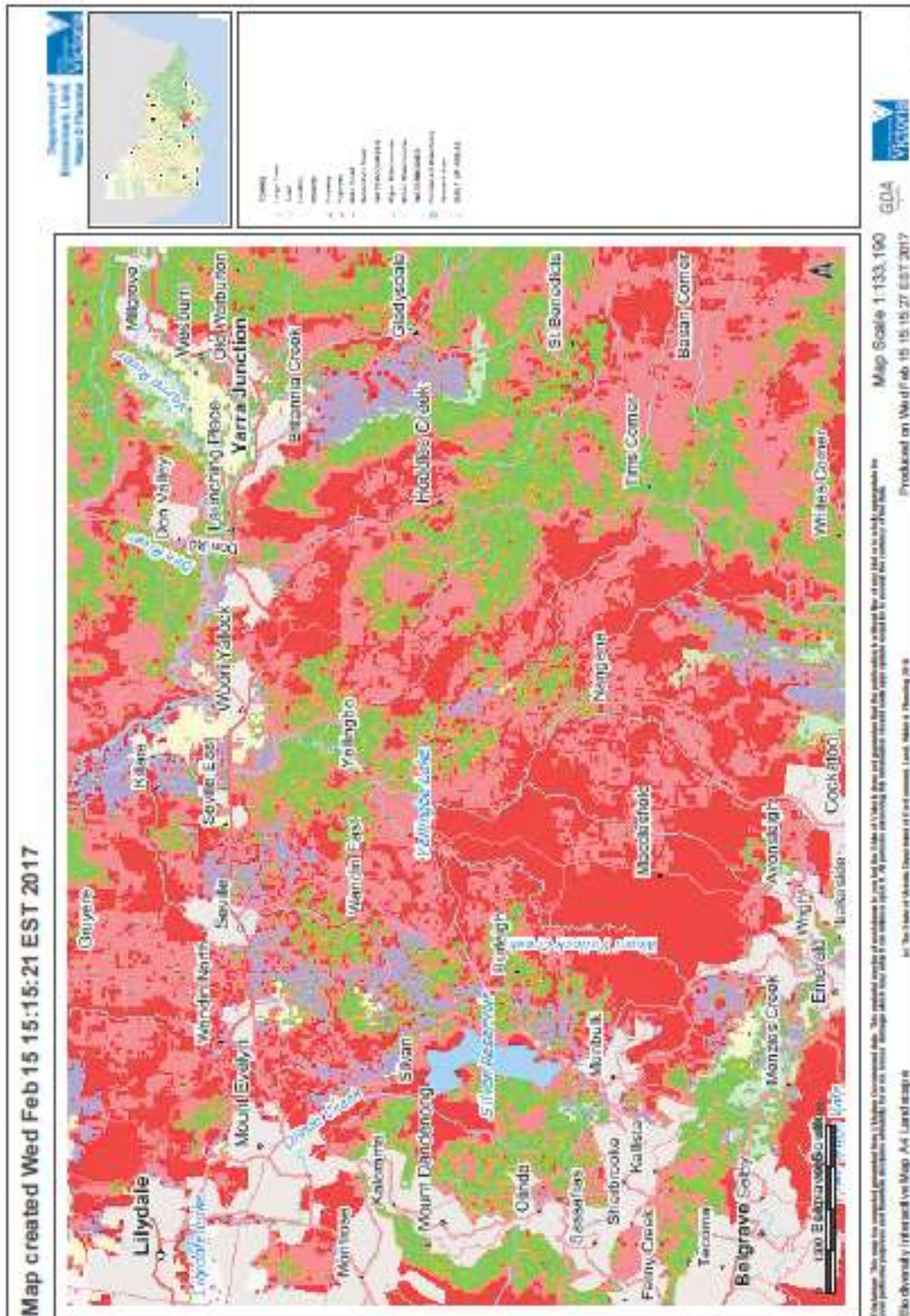
NOTE:- The Map shows that there is substantially more area suitable for Helmeted Honey eater Habitat restoration works in the North East Corner of the Yellingbo Area than in the South West Corner.

APPENDIX 6:- Condition of Native Vegetation, Yellingbo Area



NOTE:- The Condition of Native Vegetation in the north east corner of the Yellingbo Area is typical of the whole area. The conservation significance of the vegetation must also be considered and the north east corner contains many patches of endangered, vulnerable and depleted vegetation types.

APPENDIX 7:- DELWP, Nature Print - Strategic Natural Values



NOTE:- The Map indicates that the Conservation Value of riparian areas in the north east corner of the YCA are generally high (red, pink and dark green). They are typically much the same as areas along the Cockatoo Creek near Cockatoo and along the Sassafras and Emerald Creeks in the Monbulk/Sherbrooke Area.

APPENDIX 8:- MAP, Little Yarra and Don Rivers Water Supply Protection Areas

Figure 5 – Don River Catchment

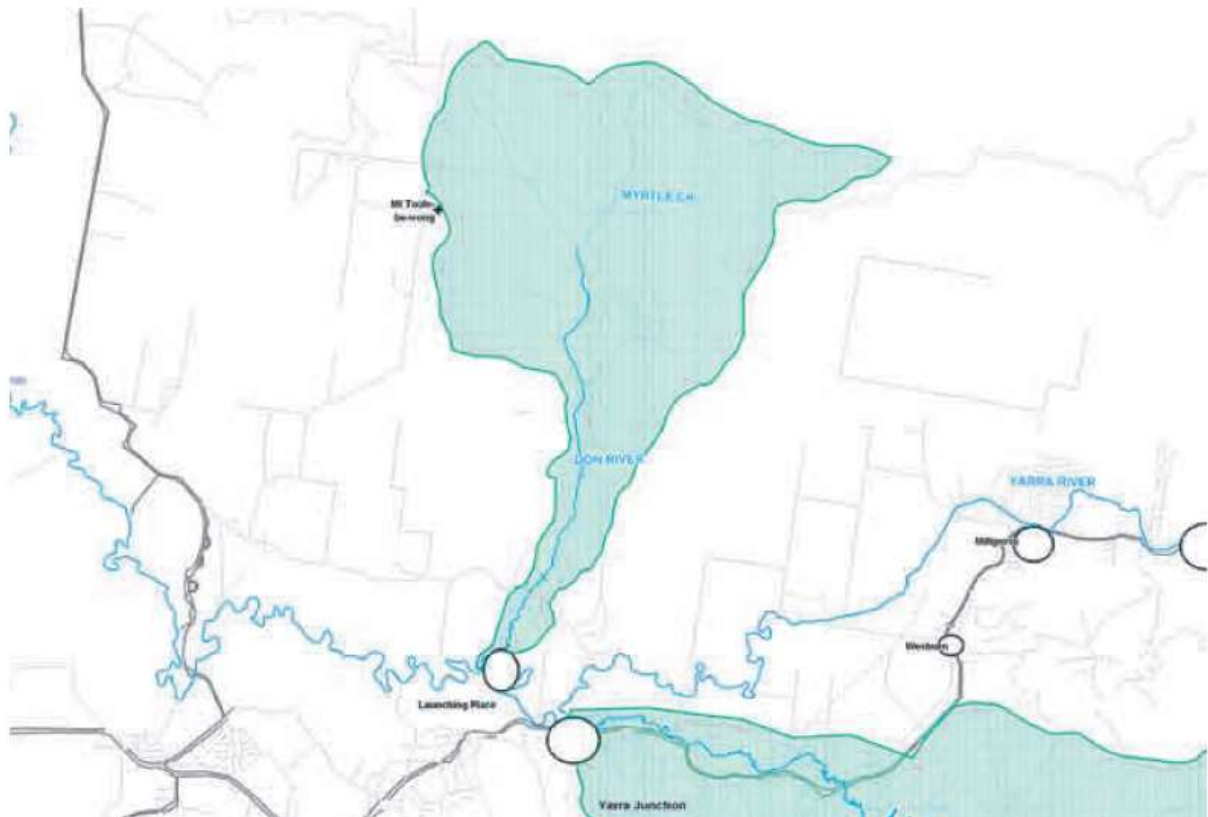
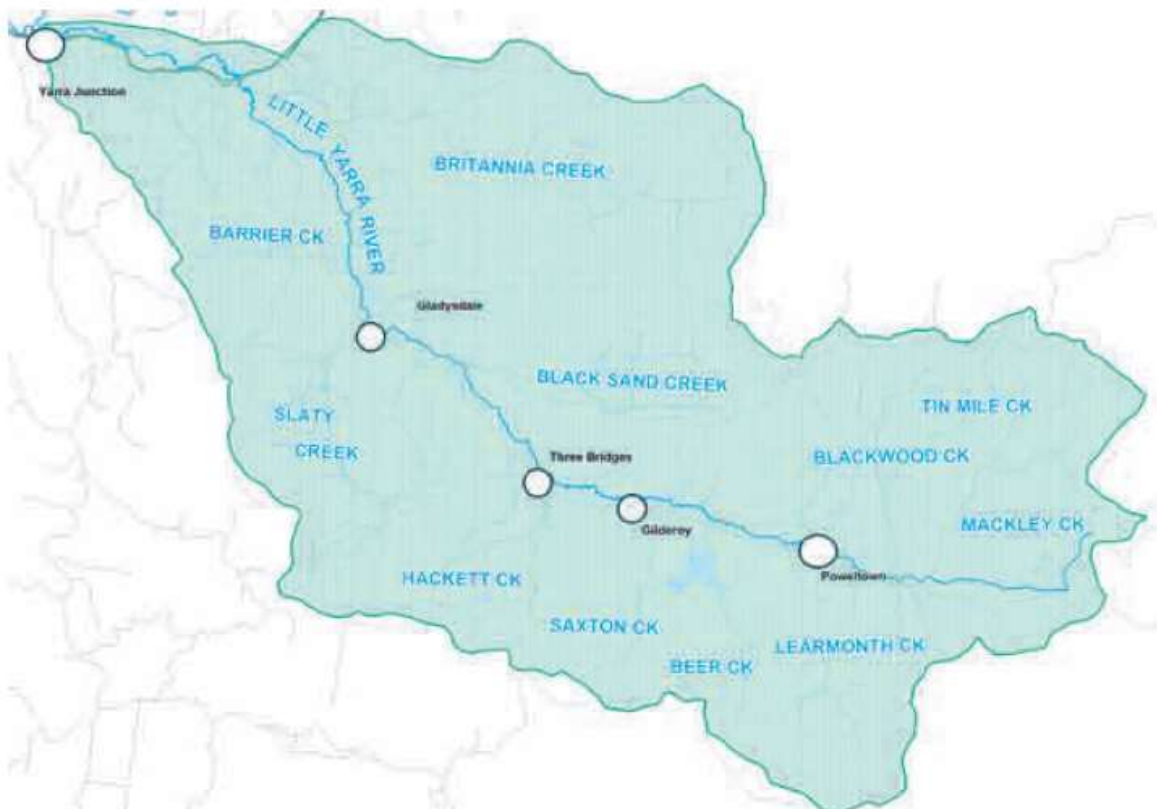
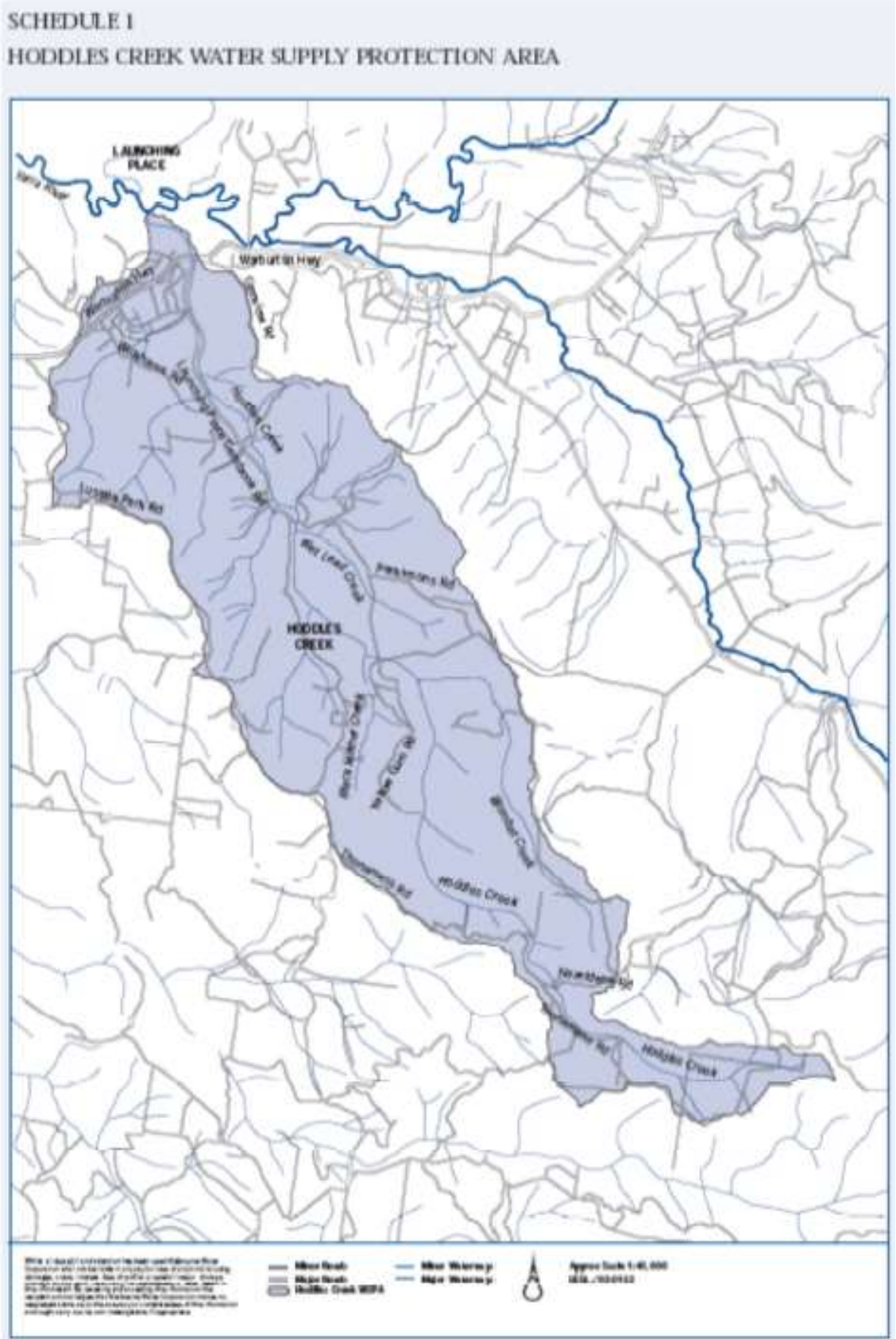


Figure 2 – Little Yarra River Catchment

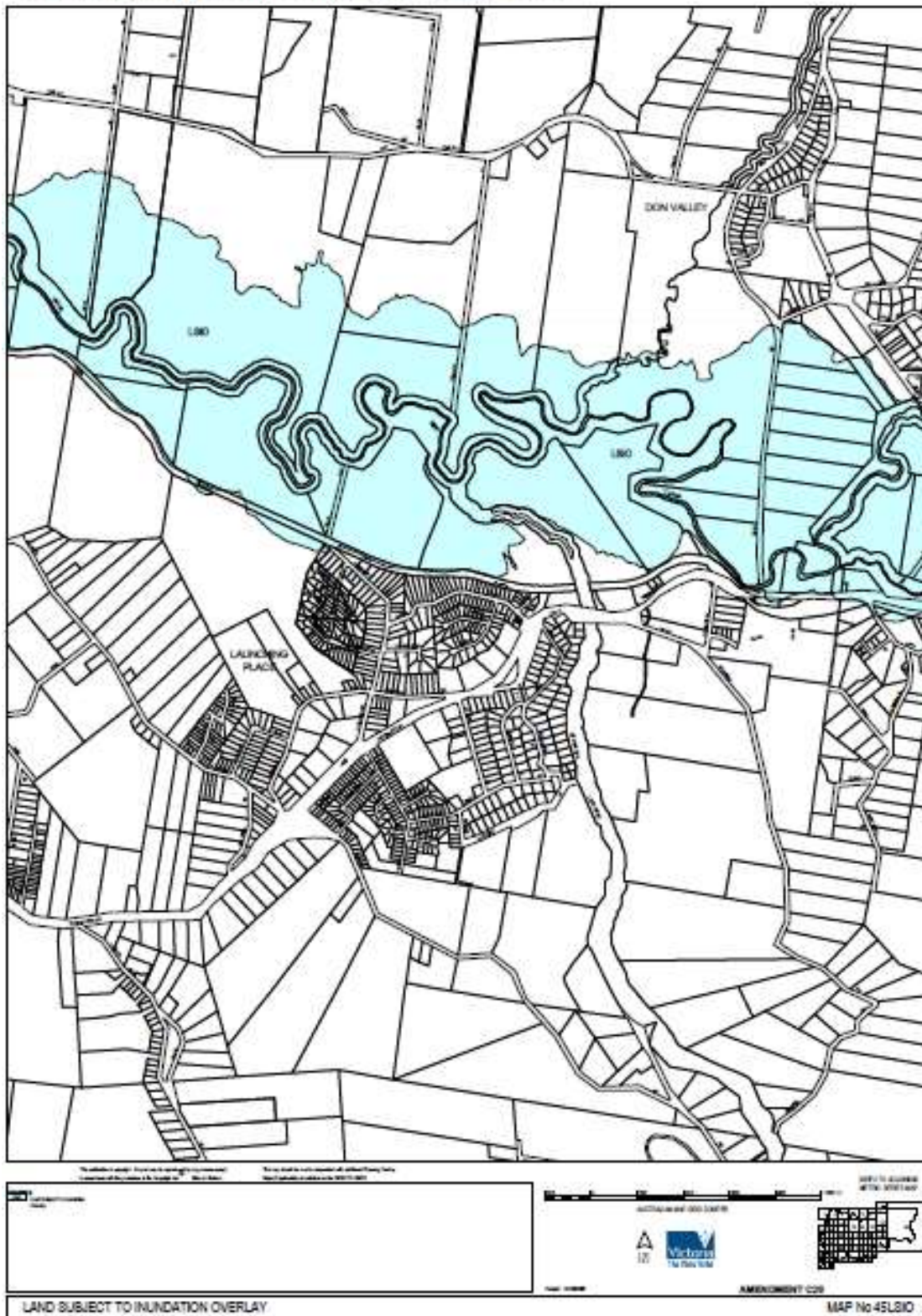


APPENDIX 9:- Hoddles Creek Water Supply Protection Area



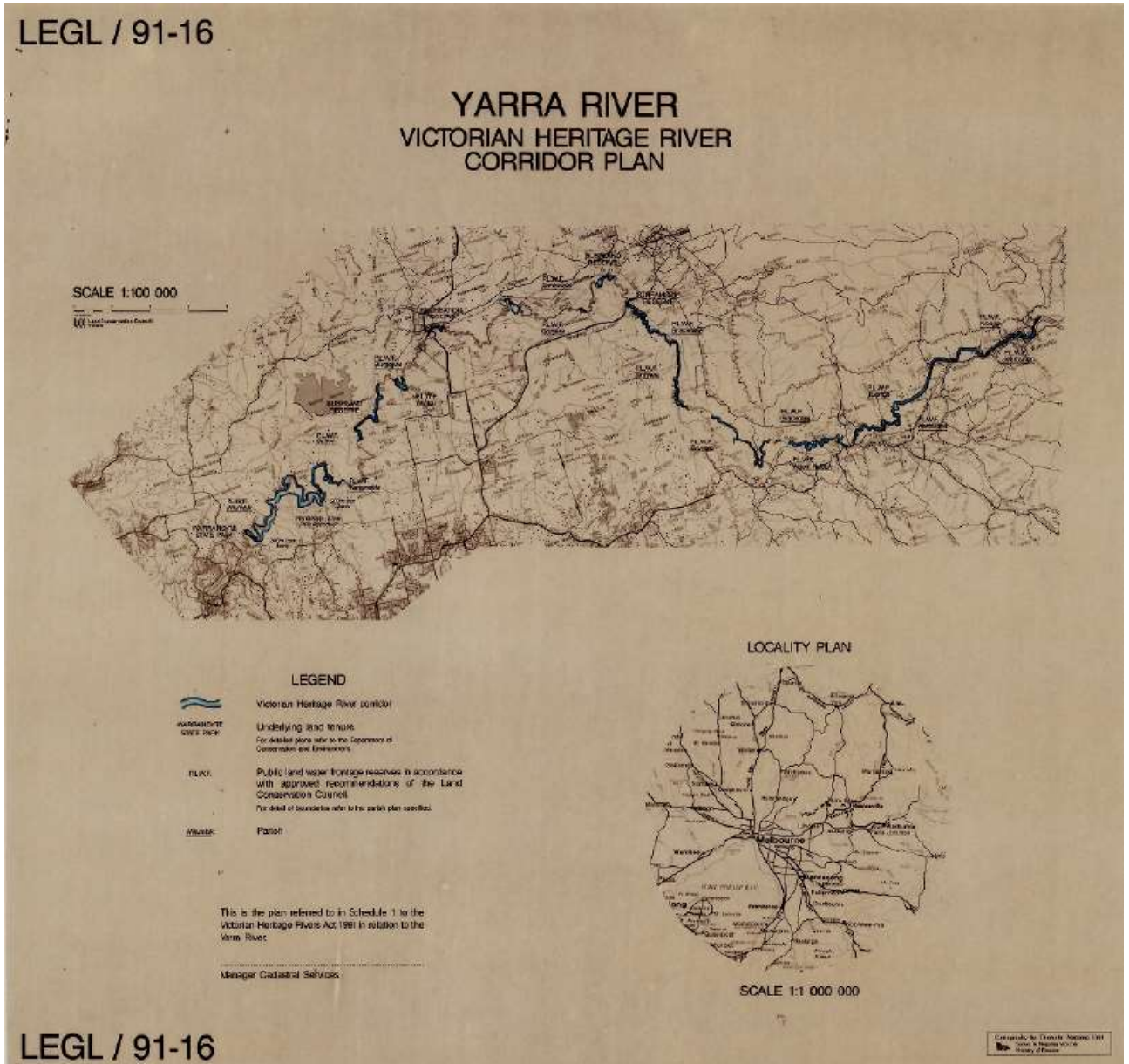
APPENDIX 10:- Map showing *Land Subject to Inundation Overlay* along the Yarra River in the Launching Place Area

YARRA RANGES PLANNING SCHEME - LOCAL PROVISION



Note:- The area in blue shows areas likely to be impacted by flooding. Appropriate riparian vegetation widths should reflect this riverine flood mapping. The extent shown here is typical for the Yarra River in the Yarra Junction, Launching Place & Woori Yallock Area.

APPENDIX 11:- Plan showing that the Yarra River in the North East Corner of the Yellingbo Conservation Area is a declared Heritage River under the Heritage Rivers Act 1992.



APPENDIX 12:- Some examples of the Community Endorsement

Southern Ranges
Environment Alliance
24 Glen Rd
Cockatoo Vic 3781

E: info@srea.org.au
W: www.srea.org.au



Date 14 March 2017

To whom it may concern,

Re: Support for Community Call for immediate review of Minister D' Ambrosio's decision to cease Yarra River Flood Plain Rehabilitation within the Yellingbo Conservation Area.

The Southern Ranges Environment Alliance (SREA) is an umbrella group that works to liaise between the many volunteers, community groups, landholders and agencies that have given high priority to protecting environmental assets within the Dandenong Ranges and adjacent areas of the Yarra Ranges and Cardinia.

Our Vision: To protect and enhance the biodiversity of the Dandenong Ranges Corridor & Surrounds

Our Mission: To actively support member groups in achieving their environmental objectives by providing assistance through a range of communication, educational and regional planning services.

Our community groups are very active in Natural Resource Management in our region. The benefit of working with these local groups is the invaluable local knowledge that comes with years of seeing the changes in the landscape.

We are very concerned with the recent announcement by Minister D' Ambrosio and are pleased to support the attached submission.

Our member groups include:

Friends of Cockatoo Creek, Friends of Gembrook Park, Friends of Kurth Kilm, Say no to Ivy, Cardinia Catchment Landcare, Cardi Creek Kids, KANGA, Kalredy, Community Weed Alliance of the Dandenongs, Muddy Creek Catchment Group, Cardinia Reservoir Biodiversity Group, Hillside Action Group and Friends of Critchley Parker Jr Reserve.

Please feel free to make contact for any further information..

Yours Sincerely

Glenn Brooks-MacMillan

SREA Facilitator
Ph: 0428427004
Southern Ranges Environment Alliance



Southern Dandenongs Landcare Group

P O Box 1294 UPWEY VIC 3158

ABN 22 799 240 301

Dear Laurence,

I am writing on behalf of the Southern Dandenongs Landcare Group in support of the submission you have prepared in response to the decision by the Minister for Energy, Environment and Climate Change, Lily D'Ambrosio, to restrict Stream Frontage revegetation to a **maximum** distance of 10 metres in the riparian areas around Launching Place and Yarra Junction. SDLG represents individuals and many small 'Friends of' groups working voluntarily to maintain waterway health and also belong to the Yarra Ranges Landcare Network.

We fully support the arguments you have made to counter the many uninformed opinions put forward in the Yarra Waterways Group Community Investigation Report. Your submission has been extremely well researched and provides numerous counter responses to issues raised in the YWG report which can be proven to be unfounded or exaggerated.

On the basis of the information provided, it is clear that the proposed 10 metre restriction on stream frontage revegetation is not consistent with current State Government and Yarra Ranges Council Policy and Practice regarding Riparian Area Management. There is no basis for singling out the north-east riparian areas of the YCA for special treatment based on bushfire risk or conservation values. We therefore request that the State Government undertake an immediate review of the 10 metre revegetation restriction.

Yours sincerely,

Darcy Duggan
President
Southern Dandenongs Landcare Group
Ph. 0459 787 779

Response of Wurundjeri Council to this Community Group Submission

From Cheryl Krause, CEO Wurundjeri Council, 17th March 2017

Wurundjeri Council would like to formally register dissatisfaction with the decision by State Government Environment Minister Lily D' Ambrosia to restrict the implementation of revegetation along sections of the Yarra River and its tributaries in the Woori Yallock, Launching Place and Yarra Junction region on Crown Land Reserves. While the Council acknowledges the very real threats imposed on property by fire it is important to understand the cultural value of the Birrurung (Yarra River) to the Wurundjeri community and the value of broad scale revegetation and environmental restoration.

The Council has spent the last 6 months negotiating a role as the traditional owners in the ongoing management of the Birrurung as part of the Yarra Ministerial Advisory Committee and to see decisions unilaterally made in this way is a regressive step for reconciliation and the respect of Indigenous engagement.

The ongoing commitment by local land owners to manage and revegetate the crown land reserves along the river has been widely seen by the Wurundjeri community as positive. It is also beneficial for the organization from an employment and engagement perspective. The Narrap Team, (the councils Indigenous Land management team), are regularly engaged by Melbourne Water and the local community as a works contractor to conduct the on-ground works. The revegetation actions also, importantly, provided protection of cultural heritage sites, provide habitat for plants and animals which are culturally valued as food, fiber and medicine and maintain the high water quality of the local area. There are cultural assets, such as the viability and ecological functionality of local billabongs, which will be placed directly at risk due to this seemingly arbitrary 10m decision.

As Traditional Owners, Wurundjeri Council has never ceded the land or water right of their Country. To this end the Council supports the submission by the local community groups which opposes the restriction of revegetation proceeding within the reserves.