

HFNC Submission to the Southern Grampians Shire Council re. Sustainability Strategy 2024-2041

23-02-2024

This submission is addressed to Melanie Russell, James Allen and Juan Donis of the SGSC.

Thank you for the opportunity to meet you and to meet with you regarding the Southern Grampians Shire Council's (SGSC) Sustainability Strategy 2024-2041 and to present on our concerns for the sustainability of biodiversity and conservation of remnant natural ecosystems and habitats within the Shire.

First up, below, are the notes I took to the meeting on Monday 19th February that were based on the **SGSC Community Vision Framework 2041**. This is followed on page 4 with our response to the **Southern Grampians Shire Council's (SGSC) Sustainability Strategy 2024-2041**.

Notes for SGSC Sustainability Community Vision Framework 2041 meeting on Monday 12th February, 9.30 am at Market Place, Hamilton.

The main point from the Hamilton Field Naturalists Club's perspective is that the Council should not treat the natural environment as something to be bargained with/balanced against as one of the stakeholders in the discussion of the Shire's potential development plans. The Hamilton Field Naturalists Club (HFNC) has always held (since its beginnings in 1958), and remains true to the commitment, that the features of natural environments within the Shire ought to be preserved for the enjoyment of current and future generations. The original members of the HFNC argued that it is always better and cheaper to preserve a natural feature than to try and replace it after it has been removed or destroyed – a principle that current HFNC members support.

The notion that any natural habitat or feature can be compromised by any new development because such action and loss can be compensated for by any property that the Shire deems as an OFFSET is nonsense. Any offset natural environment property selected by the Shire is already an environmental asset, and such property will never be a replacement for any other natural asset that has been/will be compromised through land use that destroys the environmental integrity of any other property. Hence the points made in this communication follows this principle.

The over-arching theme informing any development has to be protection and enhancement of the natural environment on which all other economic and development features depend.

Main points

1. **Never balance** the retention and preservation of the natural environment against other supposed competing stake-holder interests because, as is recognized by the Shire, the natural environment is one of the Shire's greatest assets (SGSC CVF 2041 p.5). The natural environment and the specific features should be non-negotiable assets and should not be traded for other projects on the premise that OFFSETS will compensate for the loss of any natural feature. Offsets are now seen by many ecologists as processes of 'green-washing' that never compensate for loss of any natural assets.

Natural assets can be capitalized passively to bring tourists to the Shire – the Shire is rich in natural tourism potential:

- Volcanic plains
- Rivers, lakes, waterfalls

- Mountains
- Wetlands (need to prohibit duck-hunting from the shire's wetlands to facilitate bird-friendly habitats that birders, photographers and artists love to visit)
- Remnant grassland
- Aboriginal heritage sites (Harman's Valley/Tumuli/scar trees and art sites) – these must be protected
- Hamilton Coleraine Rail Reserve bike trail needs to be completed – it has one of the best corridors of native vegetation in the State and it also show-cases the volcanic plains, Wannan River, River Red Gums and the rich farming landscape; AND
- Farming activities, farmland on the volcanic planes should be included as tourist destinations as models of production on altered landscapes.

Hamilton can be promoted as the Hub for nature tourism – it does not need to tag onto the petticoat tails of the Great Ocean Rd or Gariwerd/Grampians NP. Indeed, HFNC throughout its years of work since 1958 has brought many overnight tourists to the Shire to lead them on a variety of excursions to enjoy birding, spring flowers, fungi in May/June, volcanic landscapes, the mountains, grasslands and of course the waterways (refer to HFNC's Hamilton Region Nature Guide 2nd Edition for a list and map of over 90 different places to visit within an hour's drive of Hamilton).

NOTE – the Shire should use the name Gariwerd/Grampians in any published material.

Any capitalization ought to be on the visitation experience rather than capitalizations of the locations with infrastructure. Hence, by all means prioritize services and projects BUT at the same time maintaining and protecting the remnant natural environment. Do not allow emerging industries and agricultural use of land damage/destroy any remnant natural environment (SGSC CVF, p. 5). These interests do not compete with the remnant natural resources – they destroy it. Agriculture has already replaced over 90 percent of the natural environments that existed before Europeans settled in the region, that is, there is only very little of the former natural environments left. Any further destruction of native natural environments will remove more of this asset from our region and leave our regions poorer for such actions – such destructions cannot be compensated for by using environmental OFFSETS.

The Shire is unique with all its natural assets – tourism (ie passive tourism) ought to be a primary drawcard to expand the economic income for the Shire. This can also be enhanced with the heritage values of the built environments of Hamilton (see the 1990's booklet *Walking Hamilton* produced by the City of Hamilton using the Hamilton Heritage Study 1991 as a reference) – the surrounding towns and the farm homesteads also added to the tourist attractions.

2. Balancing stakeholder interests is always tricky because groups often do not have interests that are compatible with the retention/protection of the natural environment.
3. Do not allow minerals exploration in State Forests and local bushlands – offsets will never compensate for any damage caused by mining operations.

Moreover, our region's roads are not strong enough to cope with the heavy traffic generated by mining, forestry and other heavy industries.

4. Do not let fear of grassfires/bushfires drive inappropriate fuel reduction burns. Fuel reduction burns ought to be cool burns, patch burns and conducted at a time when seed heads are not forming – i.e. in mid to late autumn.

5. Address the issue of climate change pro-actively – so that carbon-reduction technologies are adopted by the Shire and inefficient energy buildings are renovated/replaced for reduced energy use in the future. By all means support renewable energy production projects BUT **not** at the expense of the remnant natural environments.
6. Aging population – this is not just a problem but also an asset. Many retirees are the drivers of sporting, social institutions and community-care. The Shire is attracting young retirees because of the amenity and beauty of the region and the cheaper cost of living/housing. The Shire can capitalize on attracting more recent retirees to the region by promoting its facilities, social amenities, ease of living and, for later in their lives, great aged-care facilities and options.
7. Development of water pipeline from Rocklands – while this may seem a good idea to promote intensive agriculture, there seems to be no preliminary environmental impact study done to assess the possible adverse effect on the Glenelg River ecology. Please ensure that this proposal (SGSC CVF 2041, p.58) is fully examined before any works are commenced.
8. Need for all existing SGSC assets – the SGSC CVF 2041, p. 67 suggests that the Shire may sell off any of its assets no longer seen of benefit to the Shire. Please retain all natural assets in the Shire’s portfolio as once they are sold off, then there is no guarantee that these natural assets will be retained as natural assets. HFNC has already seen what some residents in the Shire have done/tried to do to remaining grasslands and bushlands adjacent to their properties: removing large protected trees to use as firewood, let their stock roam on native grasslands – to the detriment of those important remnant grasslands, use the areas as parking areas for their old and large vehicles, stacking household and commercial rubbish in these areas – the list goes on. Please protect these areas against further detrimental use by neighbouring residents.
9. Young people leaving the Shire - the SGSC CVF 2041, p. 75 cites this as a problem for the Shire, but it is not. In fact, many do return after gaining their degrees and other professional training and become prominent and socially responsible citizens – think of people like Bianca Scaife, Helen Henry, Timothy Hallam, for example, who with their partners and young families have added richly to the Shire’s culture and amenity.
10. Ensure council officers are up-to-date with current knowledge about natural assets – e.g. ages of volcanoes. The SGSC CVF 2041, p. 81 states that Mt Napier/Tapoc is about 7,000 old – the most recent volcanic eruption in our region. This is incorrect – recent geological information suggests this volcano erupted 32,000 or 44,000 years ago.
11. ‘Friends of’ groups to manage shire assets the SGSC CVF 2041, p. 82. This suggestion is tricky. The reduced number of public servants and other large corporation employees employed in the Shire does not allow for the formation of new volunteer groups as once was the case in the pre-2000s when the number of people employed in public institutions was much greater than it is now. Currently, there are many citizens belonging to a variety of organizations and doing great volunteering for social and/or environmental works but numbers are dwindling so that many people are already taking on multiple roles in a number of different organisations – the Shire’s volunteer base is dwindling. Hence we cannot rely on volunteerism to do any more environmental works and to do it well. The Shire needs to step-up in places that are, on paper, the responsibility of Parks Vic, especially when the Shire can see merit in caring for the places as a source of income for the Shire – for example the Byaduk Caves and the Lake Linlithgow picnic area. At the Byaduk Caves this care usually will involve providing adequate parking, signage and walking paths. Toilets etc do not need to be provided as North Byaduk and Byaduk are not too distant.

12. Roads around Hamilton – Hamilton is not well-connected by roads – but it used to be. The roads need to be maintained to the standard needed to support the traffic that uses them – they are not! Any maintenance done to poor sections of road currently does not last longer than 3 years. This is major impediment to attracting visitors to the Shire as a destination or as an attractive alternative route to other places. Somehow the Shire does need to address this situation – whether by increased lobbying to State Government to gain a bigger share of the road tax from fuel, more Shire funds directed to proper road repairs etc.

Response to and comments about Southern Grampians Shire Council Sustainability Strategy 2024-2041

p.4 Our region – sustainability stewardship – a good statement and understanding of the SGSC’s responsibility to this role. Note we would put the last sentence of para 2 as:

... the Southern Grampians Shire offers a unique blend of natural beauty, rural charm, and rich cultural heritage.

This is important, especially given the last sentence refers to the community’s “*commitment to preserving the region’s natural assets, protecting biodiversity...*”

p.5 Climate challenges – good

p.6 Strategic context – in the last para need to lift **Protect our Natural Environment** to the top dot point because all other goals depend on maintaining and protecting the Natural Environment (farming, tourism, cultural activities etc).

p.7 Strategic context as stated – ongoing

p.8 Previous consultation – notice that in the dot point list **Preserving and protecting biodiversity** is at the top of the list (as it should be) – please note that OFFSETs do not achieve this aim. The Shire must at all times protect any remaining natural remnant habitat and not use the excuse that we have offsets to balance this loss if any loss is allowed by the Shire.

p.9 Council’s role – good as long as the natural environment is not lost in the process of ‘balancing’ these roles. ‘Balance’ between the natural environment and development was lost a long time ago – in most cases further losses simply cannot be allowed.

p.10 Key Focus Area 1 – sustainable agricultural practices – beware permitting practices that may have immediate or long-term effects on natural landscapes, waterways and/or other agricultural businesses (such as water use, ground water use, herbicides, pesticides, new crops that escape into the natural remnant areas (as did Tall Wheat Grass in the early 2000s), etc.

p.11 Key Focus Area 2 – the built environment – again beware the promise of environmental design principles when adding infrastructure in natural environments – do not compromise the natural habitat.

p.12 Key Focus Area 3 – waste to landfill – a problem when residents continue to purchase over-packaged items from supermarkets. Residents can be educated to purchase in bulk, buy fewer packaged items or purchase from the local markets in the towns – such as at the HIRL market. Supermarket convenience shopping is possibly the biggest contributor to landfill with most of its items heavily packaged.

p.13 Key Focus Area 4 – Water Conservation – this is major concern because this page refers mostly to meeting the current and future needs of communities, industries and ecosystems through an integrated management principle. It reads well but there is a hint of putting the community and industry needs ahead of waterways and ecosystems. Again, should there be any further suggestion of environmental water being used for industry and agriculture – environmental impact studies/audits ought to be conducted before any new development is permitted.

p.14 Key Focus Area 3 – Land Use and Biodiversity – a better way of presenting the case – that the priority is given to protection and conservation of biodiversity but beware “... *harmonious balance between environmental preservation and societal needs for a sustainable future*”. This smacks of balancing natural environments against development for societal needs. Remember that most of our natural environment was lost long ago (e.g. less than 1% of native grasslands survive in our region) and any balance was lost years ago. We cannot afford to allow it to degenerate further.

I also suggest that in the last paragraph on this page that the last sentence should read:
... and collaboration with the Glenelg Hopkins Catchment Management Authority, community Landcare groups and environmental groups such as Hamilton Field Naturalists Club.

One of the limiting factors in this report and in other previous reports came out at our meeting on Thursday 15th February at HIRL, namely, that SGSC does not have any reliable base-line data at hand to use when assessing the biodiversity values of any of the regions natural remnant environments. We experienced this when the case for stopping the crushing of rocks by the landowner of Harmans Valley arose. Although HFNC had previously produced and given many pages of information relating to the biodiversity of the geological features of this valley over two decades to the Shire and also given material about the Aboriginal heritage of the valley to the Shire, when the case come up for a public hearing SGSC could not locate any of this information. Hence, our Club is very cautious about how the Shire assesses biodiversity values of any of the land over which it makes decisions about environmental preservation when it appears not to be able to refer to any relevant conservation knowledge about particular areas in the Shire.

Our members suggested that the Shire seek the help from HFNC regarding any **base-line data** that may be needed for any biodiversity assessment to be undertaken and then for any evaluation of any initiatives undertaken – particularly of native flora and of birdlife.

Furthermore, members of HFNC at the last meeting also requested information about the reserves where SGSC is the main manager, and the reserves where the status of a management plan is unknown (SGSC CVF 2041, p. 38).

Another point of concern raised by another member was about the planting of species that are not local to the areas being rehabilitated – what we have seen planted in different places such as around Lake Hamilton are native plants but not all are indigenous to the region. Amongst species planted, we have seen species such as River Sheoak (*Casuarina cunninghamiana*) that is not a species indigenous to SW Victoria and gum trees that are not local to the area

It is a missed opportunity to enhance the local environment with local native species such as Drooping Sheoak, Silver Banksia, Manna Gum Swamp Gum etc.

It is great to see there is initiative but the resulting outcome is not as well informed regarding other environmental aspects, such as in the work done by HFNC or Friends of Forgotten Woodlands.

It would have been nice to plan the tree planting project more strategically as the resulting product should last a lifetime.

These comments represent HFNC's over-riding concern that natural environment's integrity is conserved and enhanced, and where necessary rehabilitated with species represented in the natural remnant environments such that potential problems are not created in the long term by planting species that were not originally in the areas being replanted.

p.15 Key Focus Area 6 – Community Engagement – we welcome any opportunity to pass on knowledge held by members of HFNC about environmental issues – knowledge developed after over 60 years of working for the conservation of important habitat areas; planting trees, shrubs and grasses to rehabilitate areas; conducting environmental surveys; meeting with ecologists and geologists; and also hosting field naturalists campouts in our region. In the archives on our website there is a wealth of information posted on all the issues and activities that HFNC has engaged in that can inform any discussion on and planning for environmental projects in the future.

We only ask that the Shire ensure that any material we share with it is stored in some retrievable form for the Shire's continued use of this material. HFNC has shared much in the past but this has become lost in the system or lost as environmental officers depart the Shire. We highly recommend that any material shared with environmental officers be lodged in the Shire's dedicated environmental/biodiversity files. Much time is taken up with HFNC having to repeat its engagement with the Shire on revisiting topics previously discussed with environmental officers.

Kind regards

Diane Luhrs
President, Hamilton Field Naturalists Club

