## Environment Plan (FY 2023 – 2028) – Community Feedback and Response

Section	Community Comments	Town Response
1. Overall	Thanks for the opportunity to comment It is generally an excellent document.	Noted. Thank you.
2. Purpose of the Environment Plan 2023-2028		
3. Key Drivers, Informing Documents and Stakeholders		
4. Scope and Objectives of the Environment Plan 2023-2028	Generally support but would like to see under objective for Waste Management Avoid and reduce included so it would read - To facilitate and implement projects and initiatives that aim to divert waste from landfill through avoidance, reduction, repair, repurposing, reuse or recycling. The order is important.	Noted. Included.
5. Focus Areas and Actions of the Environment Plan 2023-2028	More effort required to help the citizens of VP electrify homes in Victoria Park.	Noted. This consideration is included under the Climate Emergency Plan, for instance, under the action:  "Provide the community information on options for installing solar energy for all new and existing dwellings, including alternative financing options. Delivery of this action should include partnering with an organisation to offer residents free advice for reducing energy use and installing solar and battery storage technology".

	We will also periodically hold workshops like "Electrification Transformation" (June 2023).
Generally support action plans though the KPIs in some could be more specific eg carbon offsets, could this specify how many trees and how much carbon is offset annually and UFS, how many trees planted annually. No. 47 under waste management - number of compost and bokashi bins placed	Noted. The Town has revised the KPIs.
pg 22 Can we derive offsets through our own plantings - Since 2004 the Town has offset emissions from the Town's light vehicle fleet. This offset has been derived through native tree planting within the Yarra-Yarra Biodiversity Corridor in southwest Western Australia. To date, the Town has offset more than 5,000 tonnes of carbon emissions.	Unfortunately the Town can't derive formal offsets from our own plantings under the Urban Forest Strategy. Under the Clean Energy Regulator it doesn't seem that the Town can meet the 'newness' criteria, as we have started planting, have funding etc. The requirement for formal recognition seems to be that the project has not commenced at the time of formal accreditation.
Also support the inclusion of investigating microgrids as they localise energy gathering and distribution and can potentially support and share energy with those in the microgrid area who cannot afford solar panels. Some houses will generate more than they need.	That said, the sequestration capacity of our local planting may be estimated as part of our carbon emissions reduction estimates.
Good.	
Error here page 28 Community Water Consumption	Noted. Figures have been changed.
In 2020/21 the community water usage (residential, commercial and education) was:	
	more specific eg carbon offsets, could this specify how many trees and how much carbon is offset annually and UFS, how many trees planted annually. No. 47 under waste management - number of compost and bokashi bins placed  pg 22 Can we derive offsets through our own plantings - Since 2004 the Town has offset emissions from the Town's light vehicle fleet. This offset has been derived through native tree planting within the Yarra-Yarra Biodiversity Corridor in southwest Western Australia. To date, the Town has offset more than 5,000 tonnes of carbon emissions.  Also support the inclusion of investigating microgrids as they localise energy gathering and distribution and can potentially support and share energy with those in the microgrid area who cannot afford solar panels. Some houses will generate more than they need.  Good.  Error here page 28 Community Water Consumption  In 2020/21 the community water usage (residential, commercial

	· Scheme: 4,305,054kL, decreasing from 4,305,054kL in 2019/20. The figures are the same.	
5.3 Land Use and Built Environment	Generally support	
	Re Bushfire (5.3.1), we note that Kensington Bushland has been subject to repeated fires. The most recent recorded were in 1999, 2003 and 2016 all with devasting impact.	Noted.
	☑ Re Land use (5.3.2), we note that: o During our history research, we have found photographic and newspaper reports demonstrating that the Kent Street Sandpit has been in use since the 1940s! o We request that the statement about the restoration of the Kent Street Sandpit includes reference to the aim of delivering a world class restoration project informed by the expertise of Prof Kingsley Dixon and his colleagues at Curtin University. o In relation to the George Street Reserve, we note that "(t)his site has since been revegetated with local provenance species found within the Kensington Bushland" and other native plants (eg Corymbia maculata and Eucalyptus leucoxylon).	Noted. Updates made.
	Action 30: Development plans are checked before the issue of planning approval, to protect existing trees where possible and implement the installation of street trees in new developments once building construction is completed. Please consider a KPI for the second part of this action; eg "Native street trees will be planted in and around all new developments within 12 months of building completion."	The Town agrees in principle. Ideally the Town would have all native street trees. Unfortunately natives do not always make suitable street trees. That said, an additional KPI has been added.

	<ul> <li>Action 35: Undertake Banksia Woodland restoration of Kent St Sandpit. Please consider a stronger KPI, to replace "Staged conversion completed by June 2028" with "Restoration commenced in 2023 for completion by 2028; outcomes will be monitored in accordance with world's best practice for ecological restoration".</li> <li>[Note: or something similar as agreed with Curtin University.]</li> </ul>	Noted. However, KPI relates to completion, not commencement. Monitoring has been added.
5.4 Natural Areas and Biodiversity	Support  5.4.7 natural Areas & Biodiversity - Nature-positive Approach. I note the sentences as follows:  "Prior to the dedicated Urban Forest program, tree canopy above 3m in height covered 12.3% (or 2,214,000m²) of the Town. A canopy cover of 3,600,000m² was required to achieve the 20% target mentioned above. The Towns Urban Forest programs to date have added a projected canopy of 367,535m². which equates to 27% of our total goal achieved."  The projected tree canopy quoted is incorrect. The only tree canopy measure that matters is the one the Town has ACHIEVED, not the one you hope maybe to reach at some distant future. It will be many years before trees planted today reach 3m in height and many of them will not survive the distance. The equation above should adjust for these losses. It also needs to be adjusted to account for the 100s (if not 1000s) of trees LOST each year across the Town - especially from private land.  Re 5.4.2 In the sentence "The Town is currently working with the Friends of Jirdarup, Wadjuk Noongar Elders, and site restoration experts to rehabilitate the adjacent Kent St Sandpit" may we suggest adding "to achieve a 5-star restoration	Noted. The challenge is that the Town primarily uses tubestock for planting (as they assimilate to the planted environment better than already mature trees). For this reason, projected canopy is referred to. The wording has been adjusted, but it is important that the planting efforts under UFS are acknowledged.

of Banksia woodlands."	
We feel that the project is really very special and worth	
highlighting!	
Re. 5.4.2 Hill View Community Bushland. The spelling of the	Noted and adjusted.
name of this site is not consistent in various parts of the	Troced and adjusted.
document and should be clarified and unified in all ToVP	
documents. See also "Hillview Bushland Reserve Management	
Plan Lot 4 Berwick Street, East Victoria Park Rev 1, October	
2019"; prepared by Coterra Pty Ltd.	
ED. 544	
② Re 5.4.4:	
a the link to the Kensington Bushland Management Blaz is to	
o the link to the Kensington Bushland Management Plan is to	Noted and reviewed.
the 2017 draft. The final version to our knowledge would be	
dated 16 April 2018.	
o To our knowledge, there are no Baudin's Black Cockatoos in	
the Town of Victoria Park.	Noted and reviewed.
o For the sake of accuracy, it is true to say that "Carnaby's and	
, , , , , , , , , , , , , , , , , , , ,	
Forest Red-Tailed Black Cockatoos forage throughout the area	
(including at both Harold Rossiter Park and Jirdarup Bushland).	
The large trees at Harold Rossiter Park are a major roost for	
Forest Red-Tailed Black Cockatoos and in recent years the Great	
Cocky Count has registered 200-300 birds at this site."	
Do F 4 F. The latest Australian government State of the	Noted and revised.
Re 5.4.5. The latest Australian government State of the	
Environment Report was published in 2021 (not 2016).	
https://soe.dcceew.gov.au	
☑ Re 5.4.7.	
o Dieback: You may wish to mention the most recent report on	Noted and included.
the deaths of 16 Jarrah trees, which was commissioned by the	
the deaths of 10 Januar trees, which was commissioned by the	

Town in 2022 at the request of the Friends of Jirdarup. Arbor Carbon (2022) "Pathology of 16 Jarrah Deaths with Kensington Bushland"; Report No. J22674 for the Town of Victoria Park.

o Kensington Bushland Management Plan: It is worth noting that the 2018 Management Plan was the third such Plan for Kensington Bushland.

Noted and included.

As per Public Open Space Strategy 2019 recommendation and to "truly bring the Jirdarup Bushland Precinct together, it is recommended that ... the management plan for each sub precinct is brought together to form one management plan. This would allow the Town to consider the health of the precinct as a whole, as well as enabling it to continue to function as the most environmental significant bushland in the Town of Victoria Park."

Noted. Wording in action is as follows:

Review the Kensington Bushland Management Plan. This should incorporate the Jirdarup Bushland Precinct.

It may also be timely to mention that the area behind the PCYC might be formally incorporated in Jirdarup Bushland Precinct. This outcome would make sense and is consistent with the PCYC's stated view in the past (Source: 2005 Kensington Bushland Protection Study).

Included action to: Investigate feasibility of formally incorporating bush area behind the PCYC into the broader Jirdarup Bushland Precinct.

o Invasive weeds: we request that this entry include reference to the current

three-year hand-weeding project commenced in 2022. The project is funded

by a StateNRM grant (2022-2024) and being undertaken jointly by SERCUL, ToVP and the Friends of Jirdarup.

Noted and included.

Action 29: Weed control.	Noted and included.
o It is suggested that the KPI could be more specific – such as	Noted and included.
"priority weeds	
are removed annually."	
o Also under the weeding heading, may we suggest an	
additional action, eg.:	
"Evaluate the effectiveness of the 2022-2024 hand-weeding	
project in the	
context of the ToVP's Integrated Weed Management strategy."	
2 Action 31: Dieback & disease control. Could the KPI be more	Noted and included.
specific, eg.:	
"Recommendations of the 2022 Arbor Carbon report into recent	
Jarrah deaths in	
Jirdarup are implemented and further research conducted to	
determine the cause	
of the tree deaths."	
2 Action 32: Green Corridors: This action is fully supported. We	Nisted
suggest the	Noted.
Town might want to look into a partnership with the City of	
South Perth to build	
green corridors to the north and west of Jirdarup to connect	
with the river	
foreshore.	
2 Action 34: Fire management. You may wish to clarify the KPI –	Noted Action refers to a strategy developed
does it mean a	Noted. Action refers to a strategy developed.
review will be completed or a strategy developed?	
2 Action 37: Update of Kensington Management Plan.	
o Clarity about the Terms of Reference will be essential before	
the Plan	

commences.

o In addition, to ensure a more holistic approach, we suggest that the

Kensington Management Plan be expanded to cover the entire area

incorporating Jirdarup Bushland Precinct and Harold Rossiter Park and

possibly the area behind the PCYC; recognising the fact that these areas do

not function independently but are linked to provide a valuable natural asset.

o The Friends look forward to cooperating with the Town in the development of

the Terms of Reference as well as the management plan.

Additional action:

o Significant Tree Register. We note that the trees in Jirdarup are not included in the Town's Register of Significant Trees. We recommend an action to include all these trees (and any other excluded areas) in the

Significant Tree Register and to substantially improve the protections afforded

to trees on this Register.

o Dogs in the Bushland. We would like to suggest a specific plan to review

rules, signage and penalties regarding dogs on leads and dog excreta in

Noted. Unsure of the intent of the Terms of Reference, unless it is to establish a reference group.

Noted. The action reads:

Review the Kensington Bushland Management Plan. This should incorporate the Jirdarup Bushland Precinct.

Also included is an action to Investigate the feasibility of formally incorporating the bushland area adjacent PCYC into the broader Jirdarup Bushland Precinct.

The inclusion of Harold Rossiter Reserve can be considered. The only concern is that the total area for consideration under one plan will be significant, and the intention of use of Harold Rossiter Reserve management is mixed use, not explicitly for bushland management. That said, a management plan should certainly make reference to Harold Rossiter Reserve and other surrounding land use, to ensure that these land uses work in harmony with the Jirdarup Bushland Precinct for its protection and enhancement.

Noted. This register currently only applies to street trees and those on private property. There are greater protections afforded to Kensington Bushland as part of Bush Forever classification.

Noted. Action included to review the effectiveness of dog control activities within Kensington Bushland; and implement a dog owner behaviour change campaign.

Jirdarup Precinct and Harold Rossiter Park. This plan could include a community education campaign, such as one conducted recently in NSW (2021) "Bow wow leash me now!" dog owner behaviour change campaign. See also our comment in Appendix 4. Appendix 4: Spread of dieback – please note our comments in Noted. 3.2.2 re. Action 31 above. o Appendix 4: Uncontrolled access – please add a reference to Noted. Limiting access will be particularly important during the importance of limiting access to the restoration site in the revegetation establishment, and will be included as part of the Kent Street Sandpit. Kent St Sand Pit project. General comment Rabbits in the bushland: we commend the rapid response by the Noted and included. Town to the recent rabbit population outbreak in Kensington Bushland. A rabbit population outbreak is a serious threat to the ecology and biodiversity of the Bushland. Under the Biosecurity and Agricultural Management Act 2007 rabbits are a C3 management declared

which means they must be controlled by the land holder or land

	administrator (including local shires and government	
	departments).	
	Rabbit control methods are contentious in that they can have an	
	adverse effect on native animals and domestic animals and we	
	are	
	aware that local governments in the metropolitan area take	
	different	
	approaches. With the restoration of the Kent St Sandpit, the risk	
	of an	
	outbreak of rabbits will only increase. We urge the Town to take	
	a	
	proactive approach to managing this risk by investigating a best	
	practice response to rabbit infestation before the next outbreak.	
	Hence, an additional Action to the following effect is proposed:	
	Commission advice on a best-practice response to rabbit	
	infestation in	
	natural areas to form the basis for a Management Plan to	
	address this	
	ongoing risk. It will be important in the commissioning process	
	to	
	ensure the advice properly addresses the risks to native wildlife	
	in the Precinct.	
5.5 Waste	Action 51: Containers for change. We commend the idea and	Noted.
	look forward to	
	the opportunity to manage a container collection point at	
	Jirdarup (Waste	
	Management Section).	
	2 Appendix 4	
	o Development – See our comment about Green Corridors	Noted.
	above (Action 32).	
	o Domestic and feral animals - we have proposed additional	Noted.
	comment and	
	actions in relation to dogs and rabbits below.	

6. Monitoring and Review 7. Appendices	the community to increase community participation.  Helpful.	
6. Monitoring and		
	Annual review essential and promotion of actions achieved to	Noted and included.
		Within private spaces liked shopping centres has provided challenging. In one instance the Town battery station was asked to be removed due to contamination and management issues. The Town is always open to pursuing other options though.
	Action 42 under waste management - can this include other potential recyclables like plastic lids. Would like to see a bigger budget to cover cost of recycling stations. Identify other areas like local shopping centres, library and leisure centres where people are likely to go as drop off points. Dropping off needs to be as easy as possible. Also not needing a car to get to.	Noted. Town now has a new service provider for our recycling stations. Action has been updated to:  Continue to provide collection facilities for recyclable materials, su as dry cell batteries, light globes, mobile phones and print cartridge recycling, as well as other processable materials (e masks, plastic lids).
	the impact of dogs on natural vegetation and wildlife. For example:  ② De Frenne P et al (2022) Nutrient fertilization by dogs in periurban ecosystems.  Ecological Solutions and Evidence, 3(1).  https://doi.org/10.1002/2688- 8319.12128. Accessed 1 March 2023.  ② Rubiano M (2020). Why Leashing Dogs Is an Easy Way to Protect Birds and Their Chicks. Audubon Magazine. www.audubon.org/news/whyleashing-dogseasy-way-protect-birds-and-their-chicks. Accessed 21 August 2022.  ② Banks PB & Bryant JV (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas Biology Letters Dec 22; 3(6), P611–613.	