



To:

Kitjarra-Dja-Bul Bullarto Langi-Ut Draft Masterplan team
Corangamite Catchment Management Authority
64 Dennis Street,
Colac VIC 3250

**Re: Notes on PALM's verbal response to the Kitjarra-Dja-Bul Bullarto Langi-Ut
Draft Masterplan**

Thank you for the opportunity to respond to the draft masterplan at the meeting held in Bannockburn on the 1st of August 2023.

Members of PALM were able to canvas a range of issues and valued the engagement with your team. As discussed, even though staff appear to assiduously take notes, PALM committed to summarising our concerns in written form to assist.

As stated at the meeting, PALM believes masterplans such as this have an important role in describing how the vital environmental values of our river systems can be both protected and potentially enhanced by designing sympathetic interfaces with expanding urban areas.

In PALM's view the Masterplan is comprehensive in its scope and as a high-level document will hopefully provide guidance for future planning decisions, most notably regarding the greenfield sites planned for urban expansion to the west of Geelong abutting the Moorabool River.

PALM however raised several concerns, some to do with language, that we were able to explore with various members of your team.

What follows is a summary of those concerns.

Executive Summary

PALM's contends that the protection and enhancement of rivers must remain central role of any management plan and that human interaction be a secondary consideration done in a manner sympathetic to both of these objectives rather than being the driving ethos.

Therefore, the preponderance of human-centric language and focus is of concern. Repeated emphasis on "improved community access", "Promote Moorabool River visitation", "Provide greater community access", and "Provide greater boat access" is telling, as is the emphasis on recreation.

These two quotes illustrate the issue of priorities.

*"Kitjarra-Dja-Bul Bullarto Langi-Ut is an initiative to connect communities to the lower Moorabool and Parwan / Barwon River corridors by **balancing public access, recreation, and education** while enhancing the area's unique cultural and environmental values."*

The vision for Kitjarra-Dja-Bul Bullarto Langi-Ut is for a well-connected, diverse and healthy waterway landscape, that:

- balances **recreation**, conservation, and respect of place and culture; and*
- provides for everyday enjoyment of nature, community, liveability and wellbeing.*

PALM's emphasis added.

This could be resolved to a degree by placing "conservation"/protection as the first consideration of the plan.

It is clear that the author's use of "well connected" refers to human access. However well-connected in an ecological sense means allowing for the movement and potentially even the migration of biodiversity along our river corridors. There is little acknowledgement of this important value of our river systems through much of the Executive Summary and it is only given minor lip service in the second last paragraph on the second page. It is discussed further in the document but its absence here is notable.

The human centric theme continues with *Resilience to a changing climate* referring only to the "sustainable renewal of existing aging recreational and visitor infrastructure". Again there is no mention of river's roles in ecological resilience to the impacts of climate change for the myriad of species they support.

The Executive Summary does go to the funding question, but neglects to recognise an obligation for developers to contribute financially in greenfield sites, especially regarding any accompanying EPBC requirements which will be a vital part of financing conservation measures at these sites.

Vision and Strategic Directions

Again we note the human centric language which could be mitigated to a degree with some simple rearranging of certain words. For instance, putting conservation before recreation in sentences such as the following on Page 3: *“that balances recreation, conservation, respect of place and culture”*. Or putting riparian vegetation corridors first in *“ensure that river corridors are preserved for public open space and riparian vegetation corridors”*.

The *Climate resilience* section lays out 7 key strategic directions but as with the Executive Summary the importance of our rivers in climate change resilience is not properly acknowledged.

Under *Landscape character* a key strategic direction is to *“Protect and heal distinctive landscapes and cultural flows of the Kitjarra-Dja-Bul Bullarto Langi-Ut project area”*. If cultural flows are referring to water flows then environmental flows should be included.

Under *Community health, wellbeing, access and use* the key strategic directions are understandably human focussed but really need to better acknowledge the environmental protection context and conservation goals.

· Ensure the growing population has access to the river corridor for active and passive recreation, commerce, the arts and cultural education.

· Ensure that recreational activities do not adversely impact the environmental values of the river corridor by reserving the area immediately adjacent to the river for single lane walking trails only with sealed shared trails and active recreation located above and away from the riparian zone.

The Draft Moorabool River Reserve Masterplan of the Golden Plains Council had divided the river corridor into public access, conservation, and restoration zones. This is something PALM supports. The wording above implies that all areas immediately adjacent to the river should be available for walking trails. PALM encourages the use of qualifiers such as “where sustainable” or “where appropriate” to better reflect the necessary management of the many ecological values present at different sites along our rivers.

While a number of these issues are addressed to a varying degree later in the document they really do need to be better reflected in the Executive Summary and the Vision and Strategic Directions.

Protecting Environmental and Waterway Values

It is disappointing to see the document claiming 30mt streamside vegetation buffer can do the following:

- *maintain the natural drainage, streamside habitat and wildlife corridors and landscape values,*
- *minimise erosion of stream banks and verges, and*
- *reduce polluted surface runoff from adjacent land uses.*

Objectively this distance cannot be expected to do any of those functions well. Golden Plains Council staff refers to the areas of 30 metres width in the Moorabool River Reserve north of Batesford as “choke points”. The idea that these areas can operate as wildlife corridors is rightly regarded as fanciful, particularly where human access is also facilitated. Surely this plan should be aspirational and recognise the inadequacy of the prescribed 30 metre buffer and be recommending buffers more in keeping with functioning wildlife corridors.

It is also disappointing to see such little discussion of the need for restoring the bed of the river in the 1930s section of the Moorabool River below Fyansford. This is a glaring omission. It is well and good removing barriers to fish movement, but so much of the Moorabool River’s flows are lost through the degraded concrete infrastructure into the quarry only to be pumped out further downstream. It effectively dries out this section of the river for extended periods of the year and thus poses a significant barrier to fish migration. This needs to be properly addressed in the document.

Draft Masterplan – Northern Zone 1

Recommendations for increased parking and picnic areas detailed in Recommendations 1.4, 1.8, 1.9, 1.10, and 1.11 do not acknowledge the limitations and capacities of these sites. Increasing visitor numbers without commitments by governments to toilet installation, rubbish collection and maintenance is short sighted. An example is Hunt’s Bridge where visitor numbers have increased substantially and the issues with pollution into the waterway and rubbish dumping and littering are well documented.

<https://www.thecourier.com.au/story/5891017/human-faeces-reported-in-the-moorabool/>

It should be noted that a good proportion of the potable water supply for Geelong passes sites referred to in 1.8 and 1.9 and should be subjected to far more prescriptive recommendations than are currently in this document.

Draft Masterplan – Detail Plan A

PALM is supportive of the identification and mapping of the *Future open space* for the eastern bank upstream of Batesford.

We recognise the unsuitability of the existing flood plains for development. However the developer of land on the western bank of the Moorabool took the opportunity to develop flood plain land through extensive earthworks. PALM would like to see a stronger argument within the document for why this area should be preserved not only for public and cultural reasons but also for strong environmental protection.

The new planning amendments speak to the desirability of protecting river views including keeping building envelopes away from escarpment edges. This should be recognised within the document.

Who is involved?

PALM considers it a glaring omission that the list of relevant land managers does not include the respective Landcare organisations who have not only contributed to this document but are also heavily involved in the care and restoration of our rivers and riparian zones.

Conclusion

PALM appreciates the time and effort put into the preparation of this draft masterplan. We would like to acknowledge all contributors. We hope the final document reflects the aspirations of those who care about the future of these two significant rivers.