

The logo for the Grassy Plains Network is overlaid on a photograph of a grassy field with yellow wildflowers. The text 'Grassy Plains Network' is written in a white, sans-serif font.

Grassy Plains Network

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Ben Nam,
Acting Manager, Melbourne Strategic Assessment
Department of Environment, Land, water and Planning
Level 2, 8 Nicholson Street, East Melbourne VIC 3002

19 November 2021

Re: Review and comment on draft *Strategy for interim management in the Western Grassland Reserve*

Dear Ben,

The Grassy Plains Network, Nature West, the Victorian National Parks Association and the Little River Landcare Group thank you for the opportunity to provide feedback on the draft *Strategy for interim management in the Western Grassland Reserve*.

We summarise major points of our feedback in this letter but wish also to direct you to the accompanying document *Western Grassland Reserves Position Paper: Grassy Plains Network*, in which you will find a more extensive and detailed articulation of our position on interim management and the Western Grassland Reserves. The attached version of the draft *Strategy for interim management in the Western Grassland Reserve* also includes some editing suggestions and comments through track changes.

It is important at the outset to say that we are surprised at the lack of completeness and the rushed tone of the draft *Strategy for interim management in the Western Grassland Reserve*. We are gravely concerned that the timeline for public comment on this document, which will frame up to 40 more years of interim management, is compressed into a single week, and that the document to review has an entire crucial chapter missing, making adequate response impossible. Without labouring the point too much, the MSA team has had since June 2020 to respond to the report by the Victorian Auditor General's Office (VAGO), *Protecting Critically Endangered Grasslands*.

It is also important to say that we understand that the inadequacies of the draft *Strategy for interim management in the Western Grassland Reserve* are likely to be the product of internal

lack of resourcing within the MSA team and to emphasise that our criticisms do not reflect on the commitment of individual staff members, for whom we have considerable regard.

We are also gravely concerned about the extent of stakeholder input into the consultation process for this interim management strategy. To the best of our understanding, consultation was limited to two workshops, the first of which – quite appropriately – was dominated by Traditional Owner matters. The second workshop only lightly covered several areas of broad concern. As far as we are aware, few stakeholder groups were invited to these workshops. There were, for instance, no community groups apart from two Landcare groups and the Grassy Plains Network present. Local landholders, Pinkerton Landcare and Environment Group, those involved in the broader native restoration industry, and the future users of the park, to list just a few of many, were absent. We would have welcomed a more generous consultation process.

We would like to see the VAGO report, and the subsequent passing of the Melbourne Strategic Assessment (Environment Mitigation Levy) Act 2020, as an opportunity for a renewed vision and a reset of policy and direction for the Western Grassland Reserves.

We note the Melbourne Strategic Assessment team has undertaken some very encouraging recent work, in particular in partnership with Wyndham, and we have seen a substantial increase in land acquisition through purchase and leasing arrangements. We welcome the aerial surveying program targeting private land holdings, the increased MSA resourcing of efforts being spearheaded by Wyndham, and the improved strategies for access to private land and engagement with landholders.

We also welcome the fact that the draft *Strategy for interim management in the Western Grassland Reserve* goes beyond the narrow brief set by the *Delivering Melbourne's Newest Sustainable Communities, Strategic Impact Assessment Report 2009*.

At the same time, we note that one focus needs to be very sharply on immediate actions to identify and intervene in the time-critical management of high-value and recoverable remnant patches such as the Forsyth North block, Laska's Grassland and previously high-quality grassland between Downing St and Troups Rd South. DELWP needs to make every effort to undertake on-ground survey across the Western Grassland Reserves this summer.

Overall, and unfortunately, this draft *Strategy for interim management in the Western Grassland Reserve* is a disappointment. At the heart of that is the draft's lack of acknowledgment of past failures. Public recognition of mistakes is important in building trust, for creating the conditions by which we can move past errors of judgement, and for affirming a real hope for a genuinely good outcome for the Western Grassland Reserves.

We believe much can be attributed to lack of engagement, not listening to the original Technical Advisory Group, and not picking up on the depth of the concerns across the broad community of grassland experts, managers and concerned citizens. The supporting Landholder and Community Engagement Plan should be embedded into the draft *Strategy for interim management in the Western Grassland Reserve* in such a way that engagement and communication are recognised as central to interim management.

We note that Section 5.2 suggests that funding for cultural heritage and social outcomes should be found from other sources than the developer levy. This should not be the case. Narrow and legalistic interpretations of the goals for what the Western Grassland Reserves should and can be do nothing but imperil the whole project's success.

Apart from these general contextual matters, we wish to note the following points, which, along with other pertinent matters, are set down with greater detail in our accompanying

Western Grassland Reserves Position Paper: Grassy Plains Network. We recognise that this draft is incomplete, and we suggest that it include the following:

- Detailed discussion of the land acquisition process
- What on-ground best practice management might actually be
- Articulation of weed management strategies
- Focus on restoration
- Consider that the existing governance processes are inadequate
- Articulation of research focus
- Prioritisation of actions
- A fire management plan
- An approach to road management, and recognition of the significance of roadsides
- Detail of what incentives might encourage private land holders to take up better conservation actions
- Discussion of accountability or oversight
- Details of when and how this draft *Strategy for interim management in the Western Grassland Reserve* will come into effect
- Measurable outcomes or targets set.

We wish to reaffirm our belief that through this somewhat harsh but hopefully constructive criticism that it may be possible for the management of the Western Grassland Reserves to move away from repeating the mistakes of the past and to instead change to the extent required to allow a truly exciting outcome to emerge from what has been to date an extremely fraught process.

We thank the Melbourne Strategic Assessment team for the opportunity to provide feedback on this draft. We look forward to inputting further into subsequent drafts and continuing to work with the Melbourne Strategic Assessment team and DELWP to advance the social and conservation outcomes for the Western Grassland Reserves.

With best regards, and sincerely,

Adrian Marshall,
Facilitator, the Grassy Plains Network

And on behalf of:

Nature West
The Victorian National Parks Association
The Little River Landcare Group