

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

<b>Submission Number &amp; Date</b>	<b>Submitter</b>	<b>Nature of Submission</b>	<b>Comment</b>	<b>Recommendation</b>
1 (03/12/12)	Western Power	No objections, however there are overhead powerlines and underground cables adjacent to or traversing across the proposed area of works.	The servicing comments made are not applicable to the LBS itself but rather are development issues.	Note Submission
2 (22/01/13)	Department of Agriculture and Food	Supports the integration of a biodiversity strategy which is complementary to agriculture. With 82% of remaining remnant vegetation in the study area occurring on private land, the Department supports the recommendation of 'incentive programs' for private landholder conservation.	An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.	Note Submission
		The Department suggests that the City of Greater Geraldton would benefit from working collaboratively with conservation organisations such as NACC and WWF who are also planning conservation works on private land in the study area.	The City currently has as strong working relationship with a number of Government Agencies and it is expected that the LBS will provide further guidance on issues that are of common interest to the City and other organisations.	Note Submission
		The Department suggest that additional consideration should be given to targeting areas for revegetation/acquisition of cleared agricultural land on soils that are now consistently unproductive. This may be best managed by allowing areas of lower productivity to be separated from the more productive remainder of a farming property. This has the potential to improve the overall viability of farm businesses because the less productive soil types will no longer be cropped and farm businesses may be exposed to less financial risk. This could facilitate a change to alternative land uses such as biodiversity planting on these unproductive areas.	The LBS will be used to inform the new Local Planning Strategy and Scheme. In that process there will be opportunities to consider provisions for subdivision of agricultural land to allow the separation of areas of lower productivity to facilitate alternative agricultural pursuits such as biodiversity planting.	Note Submission

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3 (25/01/13)	Consultant on behalf of Private Landholder	<p>Site GG32 (Lot 4 Evana Terrace, Wandina) has previously been subject to a WAPC subdivision approval and subsequent detailed engineering design and approvals for construction. The POS associated with the development area has previously been vested in full, and retains all remnant vegetation. This accords with the recommendations of the LBS for vegetation to be retained wherever possible within POS reserves/where opportunities for protection and retention are defined as constrained.</p> <p>At detailed engineering design phase, the opportunity exists for retention of further stands or corridors of vegetation subject to pavement width, alignment and design, service design and fire management. This further accords with the recommendations contained in the LBS.</p> <p>Whilst not referenced in the LBS, the proponent also owns various landholdings in Glenfield, which are contained within the Glenfield Structure Plan and are identified as having development potential for a full range of urban land uses including residential and public open space. Lot 135 specifically will require provision of public open space as identified by the structure plan. This provides further opportunity for pockets of remnant vegetation to be retained.</p>	<p>The POS lot (Reserve 46942) is under the control of the City and contains remnant vegetation.</p> <p>The LBS specifically supports the designing of future development (including subdivision) to retain ecological linkages as a priority in order to achieve Goal 1 of the LBS (page 52).</p> <p>The City, through the planning process, will continue to actively work with proponents to review development proposals in order to assist with achieving the Goals of the LBS.</p>	Note Submission

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3 continued		<p>The proponent supports the initiatives to protect and retain natural areas wherever possible, but where it does not impact negatively on the existing development potential of an area. In addition, the burden should not be placed solely on the developer to implement the recommendations contained in the final LBS, rather implementation should be collaborative between the local authority and various agencies, and include opportunities for incentive and/or concessions being available to landowners. The development of such programs by the local authority and/or other agencies may assist in achieving a higher rate of retention in areas where limited opportunities have been identified.</p> <p>Successful implementation of appropriate incentive programs can ensure development is not jeopardised, whilst achieving important biodiversity outcomes.</p>	<p>It should be noted that the LBS, when identifying priority areas of conservation value (page 39), specifically considered the opportunities and potential constraints as a result of the current planning provisions (which included 'development potential' under the current zoning of the land).</p> <p>The LBS specifically notes (page 8) that achieving the vision will require stronger action from government and must also provide for stronger support for local community groups and private landowners.</p> <p>Incentives highlighted in the LBS have yet to be listed in detail and it would be premature to do so until such time as the LBS has been endorsed by Council.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p>	Note Submission
4 (29/01/13)	Consultant on behalf of Private Landholder	Support the LBS, especially the provisions of more certainty on the significance of identified environmental areas, and the expectation of City regarding retention and management of the environment in development and planning approval process. To ensure the legitimacy of the LBS, it is important for the City to work with land developers, planners and environmental consultants to achieve practical responses to biodiversity management and protection.	The City, through the planning process, will continue to actively work with proponents to review development proposals in order to assist with achieving the Goals of the LBS.	Note Submission

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4 Continued		<p>A site specific botanical assessment has been undertaken over the landholdings to the north and south of the Southern Transport Corridor (Lots 23 &amp; 800 Moloney Street and Lot 21 Scott Road) in accordance with EPA expectations, which has provided specific information regarding the vegetation types, condition and location of priority flora species. Much of this information supplements the regional data obtained from Beard (1976) vegetation mapping and the Geraldton Regional Flora and Vegetation Survey (GRFVS), however the site specific information did not correlate in all areas with the information obtained from these regional studies.</p> <p>This has potential implications to the LBS, as many of the management strategies and identification of areas of conservation significance in the LBS are reliant on this regional data. As a result we comment that the LBS clearly state in the management section, and within the description of area of conservation significance, that these assumptions have been made on the basis of regional information and should not replace site specific assessments.</p>	<p>EPA Environmental Protection Bulletin No. 10 states that regional information such as Beard vegetation association mapping and the GRFVS should be used to determine the regional significance of vegetation to support studies undertaken at a local scale in accordance with EPA Guidance Statement No. 33.</p> <p>Whilst it is acknowledged that the LBS is primarily based on regional data it should be noted that Section 1.9 'Limitations of the Study' (page 16) states the need to review the conservation significance when site specific flora and fauna surveys have been undertaken.</p> <p>Site specific information should not replace regional data but rather be used in conjunction with the regional data on a case by case basis.</p>	Note Submission

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4 Continued		<p>A local ecological linkage is shown running along the eastern alignment of much of the landholdings, and meeting up with what appears to be a creekline to the south. Following the vegetated portion of the landholdings, this linkage is shown over cleared farmland, which retains minimal environmental value, and would allow a gap of approximately 4km between patches of vegetation.</p> <p>This is at variance to the purpose of an ecological linkage, which is defined by the EPA in Guidance Statement No.33 (EPA 2008) as “<i>A network of native vegetation that maintains some ecological functions of natural areas and counters the effects of habitat fragmentation</i>”.</p> <p>It is recommended these local linkages be reviewed for its viability and functionality as an ecological linkage, both in the short term and long term.</p>	<p>The EPA definition of an ecological linkage can only be applied in landscapes that retain adequate vegetation. In the study area the vegetation has been over cleared and therefore, the linkages follow remnants and important landscape features such as creeklines and ridgelines. Opportunities and constraints to vegetation retention due to current land uses were considered and therefore linkages through agricultural land are more viable than through urban land with many roads and other infrastructure that can create barriers.</p> <p>Section 2.7 ‘Ecological Linkages’ (page 21), outlines the methodology used to identify these linkages and also acknowledges that the gaps should be targeted for restoration. This is more viable through rural lands than urban lands. Restoration of riparian vegetation is a recognised priority through various funding programs and thus provides good opportunities to achieve some outcomes.</p> <p>The recently completed “Geraldton Regional Conservation Report (2012)” provides greater detail on ecological linkages and should be referenced in the LBS.</p>	<p>Uphold (in part) Submission</p> <p>Include wording in section 2.7 page 22 to reference the Geraldton Regional Conservation Report (2012).</p>

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4 Continued		<p>The goals for retention and level of significance on the remnant vegetation are based primarily on the results of the GRFVS and mapped Beard (1976) Vegetation Associations. Regional plant communities and vegetation associations are a reasonable guide for identifying natural areas for retention; however these should only be used as a guide, and should not replace site specific studies.</p> <p>This is alluded to in the limitations of the study, however the LBS should make it clear in the management section, and within the description of area of conservation significance that the LBS is a high level guiding document for biodiversity conservation, and land use planning should consider the site specific data over and above the generic mapping contained within the LBS.</p> <p>The EPA states the following in Guidance Statement No.33 <i>“For all rezoning and development projects that may impact on native vegetation, the EPA urges authorities and applicants to obtain adequate information on the values and characteristics of the native vegetation and to consider its role in maintaining healthy catchments and biodiversity. It is generally best to carry out adequate surveys and evaluations at the initial stages of project formulation”.</i></p> <p>The LBS should be amended to clearly state and imply that in respect to land use planning for areas of potential conservation on private landholdings, that the LBS is only a high level guidance document, and site specific surveys and information will be the primary source of decision making for those landholdings subject to development projects.</p>	<p>The GRFVS report noted that the Geraldton region has been over-cleared and that all native vegetation in good or better condition should be retained.</p> <p>The GRFVS report discussed each plant community’s relationship to Beard vegetation associations and the likelihood of occurrence outside of the study area.</p> <p>The LBS is not only a high level guidance document – it sets targets for conservation of Beard vegetation associations and GRFVS plant communities based on the consideration of representation of vegetation within and outside the study area, as well as other ecological criteria and constraints/opportunities associated with land tenure and zoning.</p> <p>Whilst it is acknowledged that the LBS is primarily based on regional data it should be noted that Section 1.9 ‘Limitations of the Study’ (page 16) states the need to review the conservation significance when site specific flora and fauna surveys have been undertaken.</p> <p>Site specific information should not replace regional data but rather be used in conjunction with the regional data on a case by case basis.</p>	Note Submission

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4 Continued		<p>The goals for the local biodiversity conservation are supported in principle, but some caution should be applied in stating objectives that may be unrealistic due to wider development pressures, and in consideration of the actual value of remnant vegetation based on site specific assessments.</p>	<p>The objectives are considered realistic and development pressures have been considered. Due to the high level of clearing in the study area, every effort should be taken to retain vegetation even in poorer condition.</p> <p>Site specific information should not replace regional data but be used in conjunction with the regional data on a case by case basis.</p>	Note Submission
		<p>The regional and local significance of the plant communities identified in the GRFVS have been determined based on the extent of vegetation remaining within the GRFVS study area only. Therefore the conservation significance of these plant communities may be at variance to what is reported in the LBS if the representativeness percentages are considered for the wider region (i.e. the Geraldton Hills IBRA). The EPA's published position on vegetation retention, abstracted from the <i>Environmental Protection of Native Vegetation in Western Australia: Clearing of Native Vegetation with Particular Reference to the Agricultural Area – Position Statement No. 2 (EPA 2000)</i> states that:</p> <p><i>“there would be an expectation that a proposal would demonstrate that the vegetation removal would not compromise any vegetation type by taking it below the ‘threshold level’ of 30% of the pre-clearing extent of the vegetation type”</i></p> <p>We recommend that the LBS should either remove the ranking of conservation significance according to representativeness and extent for the GRFVS plant communities, or clearly stipulate in the ranking table and corresponding figures that assessment should also consider the greater plant community extent within the Geraldton Hills IBRA to avoid any confusion.</p>	<p>The GRFVS report discussed each plant community's relationship to Beard vegetation associations and the likelihood of occurrence outside of the study area.</p> <p>The prioritisation criteria were developed through a Technical Working group which included representative from the DEC, Office of EPA, the Department of Planning and WALGA (Perth Biodiversity Project). The prioritisation methodology included consideration of the plant communities as supported by the EPA's Environmental Protection Bulletin No. 10: Geraldton Regional Flora and Vegetation Survey (May 2010). In Table 3 (page 34) which lists the prioritisation criteria, it is clearly recognised that the plant communities with status 1A have this status because they are listed as 'potentially restricted to the study area'. Table 3 further states that "Additional detailed surveys are required to confirm this status."</p> <p>In addition, further information regarding any further studies required to confirm the status of any vegetation within the study area is discussed in Section 1.9 'Limitations of the Study' (page 16).</p>	Note Submission

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4 Continued		<p>The conservation significance of '1A' attributed to the description – 'GRFVS PC's' potentially restricted to study area is premature, as per the point above. The conservation significance of the plant communities identified in the GRFVS are unknown in consideration of their overall distribution, and should not only be considered against distribution within the study area. We recommend this be removed from Table 3 on page 34, and from corresponding figures until the actual importance and distribution of the plant communities can be established.</p>	<p>The LBS presents information available at the time of preparation. Further updates can (and indeed should) be made as a when required as a result of further information becoming available.</p>	<p>Note submission</p>
		<p>There are no explanation notes on the justification for vegetation association No. 359 to be considered conservation significance 1B.</p>	<p>Unfortunately the explanatory notes for BVA 350 were omitted from Table 1 and should be included.</p>	<p>Uphold Submission  Include explanatory notes for BVA 359 in Table 1.</p>
		<p>The criteria to categorise LPS land use categories according to opportunities and constraints to native vegetation retention and protection (refer to page 40) doesn't appear to correspond with the criteria used on the Local Planning Scheme figures in Appendix C.</p>	<p>There is an anomaly between the colours on Table 4 (page 38) and the corresponding colours used in Figures 14 – 18 of Appendix C.</p> <p>In addition, to make the cross-referencing easier to understand, the numbers used in Figures 14 – 18 of Appendix C to identify the Local Planning Scheme zones should also be included in Table 4.</p>	<p>Uphold Submission  Modify the colours of Table 4 to match those in Figures 14 – 18 of Appendix C.  Insert the numbering of the Local Planning Scheme zones on Table 4 and In Table 4 consistent with those in in Figures 14 – 18 of Appendix C.</p>
		<p>A cautious approach should be applied when identifying conservation objectives based on the current zoning of landholdings. Some landholdings which are not earmarked for development now may be suitable for rezoning in the future.</p>	<p>The LBS recognises that in many areas opportunities exist for land rezoning to accommodate future development.</p> <p>The LBS will be used to inform the new Local Planning Strategy and Scheme. In that process there will be opportunities to consider future areas for rezoning.</p>	<p>Note Submission</p>



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4 Continued		<p>Further analysis of the Areas of Conservation Value should be undertaken to take into account the actual viability of ecological linkages, and the current and future zonings of landholdings.</p>	<p>The existing land use provisions under the Local Planning Schemes and the Greater Geraldton Structure Plan were considered when proposing conservation targets for ACVs.</p> <p>The LBS acknowledges and recommends field studies to confirm the indicative conservation status of remaining vegetation as well as studies to assess fauna habitat values for each site. These additional studies will be used to proof the actual viability of the linkages on a case by case basis.</p>	Note Submission
		<p>The suggested addition to the Geraldton Local Planning Scheme (Appendix D) to consider alternative mechanisms to create new reserves without additional cost to LGA's e.g. though developer or offset contributions, Public Open Space requirement etc. is placing a potentially onerous expectation on private developers. While the opportunity to offset environmental impacts into an established program to assist in the management of local government reserves is supported, this requirement would need to be fair and relative to the likely impacts caused by the development.</p>	<p>Appendix D is a <u>suggestion only</u> for the Local Planning Scheme and is provided to illustrate how the outcomes of the LBS could potentially be included in a Local Planning Scheme.</p> <p>The LBS will be used to inform the new Local Planning Strategy and Scheme. In that process there will be opportunities to further consider any specific provisions of the Scheme.</p>	Note Submission

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4 Continued		<p>Care should be taken in attributing onerous conditions on developers though the rezoning or subdivision approval process. It should be noted that the WAPC recently released the <i>Model subdivision Schedule</i> which provides a standardized set of tested and agreed conditions. Conditions at variance to the model conditions or without justification will generally not be permitted by the WAPC.</p> <p>Additionally, while it would be an objective of most private developers to minimise vegetation clearing through the subdivision of landholdings, if the landholding is zoned to allow development (i.e. zoned Urban in the LPS), then there would be a general expectation that development would be the primary land use for the site. Opportunities for retention and management of high value natural areas within the development should be encouraged; however these opportunities should be assessed on a site by site basis.</p> <p>A City of Greater Geraldton Local Planning Policy for Biodiversity Conservation is generally supported, provided the policy provides a clear outline of the requirement of planning applications, in accordance with state and local government legislation, policies and guidelines.</p>	<p>It is not the City's intention to place onerous conditions on subdivision applications but rather achieve overall outcomes for the benefit of the community as a whole. The City can only <u>recommend</u> conditions to the WAPC who is the final approval body and will decide if the condition is justified based on the individual merits of the application.</p> <p>The LBS will be used to inform the new Local Planning Strategy and Scheme, in order to provide guidance for future land use planning and decision making by Council and the WAPC.</p> <p>The point raised is noted and will be further considered when any policies are produced.</p> <p>There will also be opportunity for further public comment in the process of approving policies.</p>	<p>Note Submission</p> <p>Note Submission</p>

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5 (25/01/13)	Consultant on behalf of Private Landholder	<p>There are concerns over the apparent inconsistency between existing urban zoning over the subject lot and the implication of the biodiversity strategy overlays. This submission in part, seeks clarification from the City on how the practical implementation of the LBS will translate to future urbanisation of Lot 8072.</p> <p>Lot 8072 is located on GG30 on Map 3 of Appendix A. It is 11.371 hectares. We have not been able to find a reference in the LBS document that shows the actual area of GG30. Given the proportionate size of Lot 8072, it is estimated GG30 would have an area of approximately 80 hectares, making Lot 8072 approximately 14% of GG30. On this ratio, Lot 8072 proportion of the target 4.3 hectares for native vegetation retention is approximately 0.6 hectares.</p> <p>Applying the 10% POS allocation to Lot 8072 during urban development gives an area of 1.137 hectares. This means if approximately half of the POS allocation was given to retention of native vegetation, as described in the Action Table recommendations, this would provide an outcome which is consistent with both the zoning of the land and requirements of LBS.</p>	<p>The simple 10% POS calculations put forward in the submission are indeed one practical avenue of achieving the Goals of the LBS.</p> <p>The LBS specifically supports the designing of subdivisions to retain ecological linkages, which may include not only POS location but also the opportunity to retain vegetation in road reserves.</p>	Note Submission

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5 Continued		<p>The LBS states “<i>All native vegetation in the area has conservation value, areas not included in an SCV should not be deemed as not having conservation value</i>”. This is important in that it recognises that native vegetation also exists outside mapped areas in the LBS.</p> <p>A simplistic interpretation could then be made that for properties not in the mapped areas, they are “out” and therefore the strategy does not apply to them. For those properties “in” mapped areas, the imposition of constraints and actions are restricted to those properties. The text reproduced in this point acknowledges that retention of native vegetation can occur in locations outside mapped areas in the LBS.</p> <p>The question therefore follows: what mechanism does the City have of documenting this process and does this then allow for reduction of target areas within mapped precincts?</p>	<p>Section 9 Evaluation and Reporting details monitoring, evaluation and reporting and the associated Action Plan provides further details on mechanisms used.</p> <p>The City would not support any target reductions within the mapped areas. The notion that increasing native vegetation retention “outside” of the mapped areas should translate into reducing native vegetation retention “inside” the mapped areas is not supported.</p> <p>The Geraldton area is included in one of only 34 global biodiversity hotspots and only 18% of the original extent of vegetation remains. Below 30%, species loss accelerates exponentially at an ecosystem level. Additional retention of native vegetation “outside” of the mapped area should be seen as further contributing to the target of 30%.</p>	Note Submission
		<p>We would like clarification from the City on whether the imposition of overlays contained in the LBS would have a material constraint to future urban development of Lot 8072.</p>	<p>Lot 8072 would be subject to the normal planning processes and the LBS does not further constrain any future urban development.</p> <p>However the City, through the planning process, will continue to actively work with proponents to review development proposals in order to assist with achieving the Goals of the LBS.</p>	Note Submission
		<p>Our client seeks confirmation from the City that future urban development of Lot 8072 could be accommodated in a manner described in the discussion above, which is consistent with recommendations in the LBS for the GG30 area.</p>	<p>The simple 10% POS calculations put forward in the submission are indeed one practical avenue of achieving the Goals of the LBS.</p>	Note Submission

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5 Continued		<p>The process of implementation is important. Our client would like clarification from the City that proportionate retention of native vegetation for all lots in GG30 would be implemented rather than 'time based' development, where the last lot to be developed in precinct GG30 is then required to retain all 4.3 hectares.</p>	<p>The LBS does in no way infer that the "last" developer in a precinct will be responsible for retaining whatever vegetation is required to achieve the stated target.</p> <p>The approach from the City will be to continue to actively work with proponents to review development proposals, through the planning process, in order to assist with achieving the Goals of the LBS in an equitable manner for all.</p>	Note Submission
		<p>Our client wishes to receive information on the relevant City of Greater Geraldton policies and guidelines which relate to retention and protection of native vegetation as part of the development process for their property, as well as what support and incentive programs are currently available for private landholder conservation within constrained ACV's such in GG30.</p>	<p>The LBS references a number of Local Government Plans and Strategies in Section 1.2 (page 10).</p> <p>Additional relevant State and Federal legislation and policy should also be referenced in the LBS.</p> <p>Incentives highlighted in the LBS have yet to be listed in detail and it would be premature to do so until such time as the LBS has been endorsed by Council.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p> <p>As part of this process there will be further community engagement.</p>	<p>Uphold Submission</p> <p>Include references to relevant State and Federal legislation and policy.</p>

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5 Continued		What process does the City intend to put in place to record implementation of the LBS recommendations and targets? The document identifies that retention of native vegetation can occur both within and outside of mapped precincts. How does the City plan to report on progressive implementation of the Strategy?	<p>Section 9 Evaluation and Reporting details monitoring, evaluation and reporting and the associated Action Plan provides further details on mechanisms used. The Action Plan contains an action to:</p> <p><i>“Incorporate specific, measurable targets for biodiversity conservation into LGA corporate strategic plans and annual reporting.”</i></p> <p>Through the Local Government Integrated Planning Framework, the City is required to report on its Corporate Business Plan which includes the City’s strategies and actions towards achieving the vision set out in the Strategic Community Plan.</p>	Note Submission
6 (28/01/13)	Private Landholder	I don’t agree with Council having the authority to determine biodiversity on private land.	<p>The only “authority” the City has is when land use changes, development or subdivision is proposed over private land. It is in these instances when the LBS will be used to assist with determining specific applications.</p> <p>However there are a number of private landowners who actively seek improved biodiversity outcomes on their own land.</p> <p>The LBS provides important guidance to all decision-making authorities and the private sector in planning to firstly avoid, and then minimise the impact of development on both crown and private land.</p>	Note Submission

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6 Continued		Where did Council state that it is going to provide compensation for changes directed at preservation?	<p>Incentives highlighted in the LBS have yet to be listed in detail and it would be premature to do so until such time as the LBS has been endorsed by Council.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p>	Note Submission
		The only place the large Wattle trees and Banksia are surviving is on the road verge where they receive run off from the road. However, you have let Western Power contractors cut down all these trees under the power lines.	<p>Whilst the issue is noted, under the Electricity Corporations Act 2005 (WA) Western Power is responsible for the safety and reliability of the powerlines and other associated electricity infrastructure.</p> <p>To ensure that transmission lines operate in a safe and secure manner, and to assist in preventing bush fires, sufficient clearances must be maintained between vegetation and live electrical conductors (wires).</p>	Dismiss Submission
		<p>Most Wattle and Banksia on my lot are poor specimens and will not regenerate unless there is a dramatic change in weather pattern. The smaller Wattle will only live for 7 years and is being stressed to its limit.</p> <p>Come and have a drive around and observe some of the ACVs from the road, it isn't a very encouraging site and more of a fire hazard.</p>	<p>The issue is noted and the LBS does recognise that the Geraldton region has been over-cleared and biodiversity is threatened by land use, climate change and other factors.</p> <p>To address these issues, the LBS contains objectives for the retention and protection of existing native vegetation, the management of protected natural areas, the regeneration of cleared areas, and community engagement in biodiversity conservation.</p>	Note Submission
7 (30/01/13)	Private Landholder	In principle I support the general essence of the plan.		Note Submission

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7 Continued		<p>On the LBS the areas marked as remnant vegetation and worthy of preservation, occupy in excess of 50% of my land.</p> <p>This 50% loss of land use would significantly impact on present and future enjoyment of our home with cumbersome restrictions.</p>	<p>The LBS in no way restricts any existing enjoyment of any private land. When land use changes, development or subdivision is proposed over private land the LBS will be used to assist with determining specific applications.</p> <p>It should be noted that there are a number of private landowners who actively seek improved biodiversity outcomes on their own land.</p> <p>The Waggrakine Rural-Residential Structure Plan approved by Council and the WAPC facilitates subdivision and addresses the vegetation issues associated with subdivision and development applications.</p>	Dismiss Submission
		<p>In light of recent tragic fire events across the country including WA, I am opposed to the plan of personally ceding, maintaining or adding to an environment that carries with it a high level of fear and has the potential to put life at risk given the high fire risk nature of that environment.</p>	<p>The LBS does not (and cannot) take precedence over mandatory fire break requirements of the Bush Fires Act 1954, nor preclude fire mitigation works that may be identified by authorised City Fire Control Officers.</p> <p>However there are there are a number of private landowners who actively seek improved biodiversity outcomes on their own land and the LBS will assist those people.</p>	Note Submission
		<p>I support in principle all the points made in the brochure received. I can support a plan that effectively enhances the value of the asset and supports my choice of lifestyle – man meeting nature.</p>		Note Submission
8 (31/01/13)	Geraldton Resident	Support the initiative and drafting of the Strategy.		Note Submission



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8 Continued		<p>The Strategy would be more aptly and accurately titled a 'Local Flora Strategy'. Biodiversity is defined in the draft as "<i>the variety of life forms, the different plants, animals, and micro-organisms, the genes they contain, and the ecosystems of which they form part (page 7)</i>". However, the Strategy focuses on plant communities, excludes animals and makes no reference to micro-organisms.</p>	<p>Plant communities are commonly used as a surrogate for conservation planning as they provide habitat for different species of flora, fauna, fungi, etc.</p> <p>The LBS focuses on aspects of biodiversity that are within the responsibilities of the City and for which spatial data was available.</p> <p>Section 1.9, Limitations of the Study (page 16) explains that fauna was not included due to lack of data, however there are requirements to undertake fauna surveys and assessment of vegetation as potential fauna habitat. In addition the ecological linkages have been designed to accommodate a wide range of fauna movement through the region.</p> <p>Further, Section 2.8 (page 22) states that protection of other landscape features, such as wetlands, rivers, coastal dunes is critical to maintaining biodiversity.</p>	Note Submission

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
8 Continued		<p>The reason for excluding fauna at this time is due to “<i>Spot information on fauna within the LBS is inconsistent of Local Natural Areas (LNAs)</i>” (page 16). This is inconsistent with information provided in the LBS which refers to the importance of fauna, recognised in the requirement for detailed fauna studies in future land planning decisions</p> <ul style="list-style-type: none"> <li>• the CGG’s Strategic Community Plan 2011-2012 “Preserving, rehabilitating and enhancing natural flora and fauna corridors” (p13)</li> <li>• the fauna species recorded within the study area protected by the EPBA Act 1999, and the rare or threatened species protected under the <i>State Wildlife Conservation Act 1950</i>.</li> </ul> <p>The collection and inclusion of fauna data is integral to the LBS, adds scientific rigour to conservation outcomes, supports local government, State and Federal initiative, and avoids strategic decisions made on insufficient information, solely based on vegetation.</p>	<p>The quote is not correct. Section 1.9 states:</p> <p><i>“Spot information on fauna within the LBS area is inconsistent and limited and therefore not included in the spatial model of the conservation significance of LNAs. There is a need to consider fauna habitat requirements in future studies, planning and decision-making.”</i></p> <p>As adequate data was not available at the time the LBS was prepared, it could not be included in the LBS. The LBS cannot wait until detailed fauna data becomes available as the region has been over-cleared and is under continuing pressure for further development.</p> <p>However, since the public advertising of the LBS the Geraldton Regional Conservation Report has been published and provides an overview of fauna studies in the study area.</p>	<p>Uphold (in part) Submission</p> <p>Include section from the Geraldton Regional Conservation Report which provides an overview of fauna studies in the study area.</p>
		<p>The LBS tentatively indicates a fauna inclusion timeline proposed by the draft which is “<i>within 5-10 years of the endorsement of the final LBS by the LGA</i>” (page 58), <i>and then when opportunities arise</i>” (page 64, Action 27).</p> <p>The timeline does not take into account the strategic value of identifying current species associations and ecosystems to prioritise LNAs that have abundance and diversity for protection and retention at present.</p> <p>This would provide a better biodiversity outcome than making fauna assessments post planned developments, when remaining LNAs would be less in number and remaining ecosystems significantly more degraded.</p>	<p>As outlined above, Section 1.9 explains that fauna was not included due to lack of data.</p> <p>There is potential for further fauna information to be obtained from site specific surveys (as per EPA requirements).</p>	<p>Note Submission</p>

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
8 Continued		<p>The commercial cost quoted in the LBS to regenerate one hectare of native vegetation is \$250,000 (page 10). This could be equally applied as a comparative value to an existing hectare of native vegetation. A minimum of 30% (1,1812ha) of existing vegetation is land identified for future development. This equates to a native vegetation community assets value loss of \$453 million (\$250,000 multiplied by 1,182).</p> <p>A further 20% (1,208 ha) may potentially be cleared for future developments at a value of \$302 million to the community. The LBS prioritises retention and protection over regeneration. Hence re-evaluating the LNA's proposed for development by retaining and protecting existing vegetation, will provide a less costly exercise to CGG and SCV than pursuing revegetation, where the rate of revegetation is required to exceed degradation.</p>	<p>The cost per hectare of regeneration was quoted in good faith based on anecdotal information at the time.</p> <p>The Department of Environment and Conservation (see Submission 11) has advised the \$250,000 per hectare figure is not supported.</p>	<p>Uphold Submission</p> <p>Remove any reference to the cost per hectare to restore or regenerate native vegetation on pages 8 and 10.</p>
		<p>WALGA guidelines identify the need to retain greater than 30% of specific plant communities to remain viable, below 30% loss is exponential and leads to local extinction (page 15).</p> <p>Many plant community areas encompassed by the LBS are below 30%. In this instance specific emphasis must be made to regenerate plant communities that are evaluated as recoverable, to increase their resilience and to reinstate sustainable plant communities.</p>	<p>The City agrees that emphasis must be made to regenerate plant communities that are evaluated as recoverable, to increase their resilience and to reinstate sustainable plant communities.</p>	<p>Note Submission</p>
		<p>The LBS identifies a number of mechanisms that may encourage landholders to contribute to land conservation, however it does not specify or make commitment to what the CGG and SCV will implement as part of the LBS. Does the CGG intend to implement rate rebates or differential rating, grants, environmental levies, or developer contributions as part of the LBS?</p>	<p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p>	<p>Note Submission</p>

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
8 Continued		Who will manage the LBS at CGG and SCV, and what biodiversity training for CGG and SCV staff will take place to implement and manage LBS?	The implementation of the LBS will be a joint responsibility across a number of the City's Departments and will not rest solely on one individual. However, it is important to note that the City have specific Environmental and Sustainability Officers in the Department of Sustainability Communities.	Note Submission
		There is no recognition of Aboriginal traditional flora and fauna ecological knowledge in the LBS, or important Aboriginal heritage sites in the LNSs within the CGG and SCV. These are applicable to the LBS as identified in the <i>2029 and Beyond Community Charter</i> .	Information on Aboriginal traditional flora is not well documented in the Region and can only be included if the information is readily available at the time. In any event the Aboriginal heritage sites are protected under the requirements of the Aboriginal Heritage Act.	Note Submission
		The LBS briefly details a corridor involving ecological connectivity along 17km of Chapman River between the mouth of the river and Cutubury Nature Reserve (page 21). This could be further developed for Federal biodiversity funding initiatives, to include aspects of landscape, habitat and evolutionary connectivity. For example it could provide a means to monitor the effect of edge increases and interior habitat decreases reducing populations, or to determine endemic species minimum fragmented area requirements for survival in LNAs, or to support species that require intact habitat to disperse.	The City agrees with the comments.	Note Submission
9 (03/02/13)	Geraldton Resident	This strategy needs a good edit. There are grammatical errors on almost every page, many making it extremely difficult to make sense of the content.	Once final approval is given to the LBS a full edit will be undertaken to correct any minor grammatical errors.	Note Submission
		Hard copy of maps is poor quality; legends of several maps are illegible at the size (A3).	The 'hard copy' information provided to the public was printed at a size that enabled information to be mailed out. Mapping can be printed out larger upon request. The electronic data will be incorporated into the City's GIS system and is available upon request.	Note Submission

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
9 Continued		Correction to reference, Desmond AJ and Heriot SM (2002) Fauna Monitoring of the Chapman Rover Wildlife Corridor Geraldton, is listed as unpublished. It was published as part of the Chapman River Wildlife Corridor Project in 2002. It is also noted in the Project Report for the Chapman Regional Wildlife Corridor Project (2002).	Reference to be changed to:  Desmond AJ and Heriot SM (2002) <i>Fauna Monitoring of the Chapman River Wildlife Corridor, Geraldton, CRWC Project.</i>	Uphold Submission  Change reference accordingly.
10 (19/02/13)	Private Landholder	<p>My objections to the LBS is not one of the need for conservation only the methodology that has been used and the lack of detail provided in the draft as to how the outcomes will be achieved.</p> <p>I have actively engaged in land management practices that have ensured the vast majority of natural vegetation has been retained, maintained and regenerated.</p> <p>I have also erected rabbit proof fencing and actively engaged in rabbit eradication at considerable cost to myself in order to enhance vegetation.</p> <p>It is through my efforts that the vegetation is still here and I am of the firm belief that I am better equipped to conserve and manage this land that a local government.</p>	<p>Incentives highlighted in the LBS have yet to be listed in detail and it would be premature to do so until such time as the LBS has been endorsed by Council.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p> <p>The commitment to land management practices as outlined in the submission is commended by the City as an example of private landowners who actively seek improved biodiversity outcomes on their own land. The LBS will assist those people.</p>	<p>Note Submission</p> <p>Note Submission</p>

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		<p>The Steering Committee had no private landholder representation. No formal invitation was offered to private stakeholders. Fostering good relations with all stakeholders would surely produce a far better outcome.</p>	<p>The development of the LBS included substantial community and stakeholder engagement, and was formulated within a Stakeholder Engagement Plan designed to involve stakeholders in the planning process through 3 separate stages.</p> <p>A community survey was conducted online and in hard copy. It was advertised in the local paper, City's website and emailed out to over 173 community members who had registered an interest in the project. An information session and background briefing was held on the 17 and 18 May 2010 for all interested parties. This was advertised on the City's website, community service announcement in the local paper and correspondence were sent to all contacts registered. On the 21 July 2010 the City held a 4 hour public target setting forum inviting all members from the public. The forum was advertised in the local paper, including a large article in the Midwest Times, the City's website, ABC radio, and correspondence were sent to all contacts registered.</p> <p>Throughout the above, a public consultation page remained available on the City's website. It contained information on upcoming consultation events, a section for community members to lodge new comments and view past results from community consultations on the Strategy.</p> <p>The objectives of the LBS were created through the community engagement process and aligns with the broader vision of the City of Greater Geraldton in the 'Strategic Community Plan' and the '2029 and Beyond Community Charter' as outlined in section 1.2 of the LBS.</p>	Dismiss Submission

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		<p><u>Conservation</u></p> <p>Precincts do not necessarily protect fauna and flora. Using schools and road verges as linkages place fauna at risk of high traffic resulting in high mortality rates. Children at schools would also be at risk of interaction with fauna such as snakes.</p>	<p>Road reserves form a good basis for ecological linkages and in some cases is the most conducive areas to strengthen and increase linkages. The issue of using schools is noted however schools are increasingly being involved in biodiversity conservation through other measures not necessarily planting on the site itself.</p>	Dismiss Submission
		<p>All stock should be removed from denigrated rural residential land and the land be regenerated, rather than expecting a small portion of responsible landowners to carry the burden of conservation without any compensation being offered.</p>	<p>Stocking rates for rural residential land are prescribed in the City's Local Planning Scheme No. 5. It should also be noted that there are provisions in the Scheme to limit stocking rates as a result of land degradation.</p> <p>The LBS specifically notes (page 8) that achieving the vision will require stronger action from government and must also provide for stronger support for local community groups and private landowners.</p> <p>It should also be noted that there are a number of private landowners who actively seek improved biodiversity outcomes on their own land and don't consider this a "burden".</p>	Dismiss Submission
		<p>Restrictive burn practices should be adopted to allow the regeneration of Banksia Woodlands.</p>	<p>There are long established mechanisms in place where applications can be made to the City for Burning Permits under the Bush Fires Act 1954.</p>	Note Submission
		<p>Preventing clearing does not equate to conservation of either flora or fauna. Without an exhaustive management plan including feral animal control, weed control and fire management plan in place to protect all biodiversity this plan is inadequate. Weeds are generated from adjoining denigrated land and should be controlled on conservation boundaries.</p>	<p>Fire Management Plans have been produced for a number of subdivisions, developments and special risk sites according to development requirements and/or owner occupier levels of responsibilities or willingness. There are no "Bushfire Prone Areas" gazetted within the City. Planning for Bushfire Protection Guidelines from the WAPC provides the framework and methodology for determining bushfire hazard levels in WA.</p>	Note Submission

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		Does the City have any intention to genuinely focus and promote rehabilitation of denigrated rural residential land to promote safe linkages for fauna?	<p>The LBS acknowledges the importance of providing long term biodiversity retention and supports any retention of vegetation for linkages.</p> <p>It should also be noted that the Waggrakine Rural-Residential Structure Plan has specific revegetation requirements for subdivision applications and the Plan also states that the revegetation and rehabilitation should be prioritised to establish linkages and rehabilitate degraded vegetation.</p>	Dismiss Submission
		Is the City prepared to undertake to remove or limit stock on rural residential properties and encourage rehabilitation of denigrated land through genuine incentives?	<p>Stocking rates for rural residential land are prescribed in the City's Local Planning Scheme No. 5. It should also be noted that there are provisions in the Scheme to limit stocking rates as a result of land degradation.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS..</p>	Note Submission
		Will the City address the issue of controlled burning for conservation purposes and fire management safety to prevent excessive fuel loads building up conservation areas?	<p>Urban Bushland Fire Response plans have been produced for the most significant areas of the Chapman River Regional Park.</p> <p>There are long established mechanisms in place where applications can be made to the City for Burning Permits under the Bush Fires Act 1954.</p>	Note Submission
		Will the City take steps to control weeds and feral animals on denigrated land on conservation boundaries weather private or publicly owned?	The City is currently developing a draft invasive species plan in conjunction with NACC and the Shire of Chapman Valley. This plan will assist with strategies to address invasive species across different tenured land.	Note Submission



**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		<p>How does the City justify placing a small portion of the community with the burden of conservation?</p>	<p>The LBS does not place any specific burden on any one part of the community, and indeed the LBS specifically notes (page 8) that achieving the vision will require stronger action from government and must also provide for stronger support for local community groups and private landowners.</p> <p>When land use changes, development or subdivision is proposed over private land the LBS will be used to assist with determining those specific applications.</p> <p>It should also be noted that there are a number of private landowners who actively seek improved biodiversity outcomes on their own land and don't consider this a "burden".</p>	Dismiss Submission
		<p><u>Management</u></p> <p>With only two staff currently in the environmental and sustainability department will implementation of the Strategy require more staff? Will this increase rate revenue? If this is the case, the City has the responsibility to inform all Geraldton ratepayers of its intention to increase rates in order to manage private land.</p>	<p>The implementation of the LBS will be a joint responsibility across a number of the City's Departments and will not rest solely on the Environmental and Sustainability Officers in the Department of Sustainability Communities.</p> <p>Staff resourcing will always be considered on an 'as needs' basis and rates will always be adopted by Council in line with the City's adopted financial and budget practices.</p> <p>The City is preparing a project brief to engage a consultant in 2013/14 to draft a Biodiversity Conservation Incentives Strategy for Private Land as recommended in the LBS. These incentives may well increase the number of private landowners who actively seek improved biodiversity outcomes on their own land.</p>	Note Submission

**Geraldton Local Biodiversity Strategy (LBS)  
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Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		<p>The strategy offers incentives however as these have not been endorsed by Council it is very unclear as to what these incentives may be or even if they will eventuate.</p>	<p>Incentives highlighted in the LBS have yet to be listed in detail and it would be premature to do so until such time as the LBS has been endorsed by Council.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p>	Note Submission
		<p>Exactly what does active management mean and how will it be decided which private properties will be actively managed? Does this include the removal of dead vegetation to reduce fire risk?</p>	<p>Active management involves undertaking activities that will ensure long term maintenance of natural area ecological functions and its values. These activities can include controlling unauthorised access/use (or use that is incompatible with the conservation values of the area), weed and feral animal control, disease control, fire and post fire management, erosion control, rubbish removal and restoring natural water regimes where applicable. Raising awareness about the values of a natural area through appropriate signage and community engagement is also encouraged.</p> <p>The City will not necessarily actively manage private land parcels but rather provide a support role for those private landowners who actively seek improved biodiversity outcomes on their own land.</p> <p>With the issue of fire risk, Bushfire Risk Management Plans are being promoted and supported state wide by DFES. The CGG Fire Section will adopt and compile BRMP's according to priorities and available resources</p>	Note Submission

**Geraldton Local Biodiversity Strategy (LBS)  
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Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		How will staff actively manage the biodiversity strategy and what will be the cost to ratepayers to successfully manage and implement this project?	<p>Active management by staff will involve undertaking activities that will ensure long term maintenance of natural area ecological functions and its values. These activities can include controlling unauthorised access/use (or use that is incompatible with the conservation values of the area), weed and feral animal control, disease control, fire and post fire management, erosion control, rubbish removal and restoring natural water regimes where applicable. Raising awareness about the values of a natural area through appropriate signage and community engagement is also encouraged.</p> <p>Additionally, Section 9 Evaluation and Reporting details monitoring, evaluation and reporting and the associated Action Plan provides further details on mechanisms used.</p> <p>And further, an action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p> <p>It should be noted that adoption of the LBS does not commit Council to any of the recommendations but does allow for the recommendations to be funded out of the annual budgeting process.</p>	Note Submission

**Geraldton Local Biodiversity Strategy (LBS)  
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Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		Why is the City getting involved in the area of conservation and placing extra burden on rate payers when DEC already has control of native vegetation on private land?	<p>The City's policies, strategies and results of community engagement show that the natural environment is highly valued. The reality is that less than 18% of native vegetation remains in the study area and nearly half of that may be lost through planned developments.</p> <p>The City's involvement is further justified by the EPA Bulletin 891 on the Geraldton Regional Plan which highlighted the need for retention and conservation of remnant vegetation and to conserve remnant vegetation in the area.</p> <p>Consideration of biodiversity is now fundamental in land use planning and the LBS provides the City with a strategic way of addressing this requirement.</p> <p>The LBS does not place any specific burden on any one part of the community, and indeed the LBS specifically notes (page 8) that achieving the vision will require stronger action from government and must also provide for stronger support for local community groups and private landowners.</p> <p>When land use changes, development or subdivision is proposed over private land the LBS will be used to assist with determining those specific applications.</p> <p>It should also be noted that there are a number of private landowners who actively seek improved biodiversity outcomes on their own land and don't consider this a "burden".</p>	Note Submission

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		<p>Why has the City rushed the release of the draft when it has not been endorsed by Council as to the incentives available and no real accurate detail can be provided to land owners by City staff?</p>	<p>Incentives highlighted in the LBS have yet to be listed in detail and it would be premature to do so until such time as the LBS has been endorsed by Council.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS.</p>	Dismiss Submission
		<p><u>Financial considerations</u></p> <p>Landowners in the conservation areas have a marked financial disadvantage compared to those on similar sized lots in the Geraldton Area. 90% of vegetation on my block is significant native species; it appears I will not be able to clear land to erect a shed or another outbuilding. These restrictions imposed severely restrict and devalue the resale value of the land.</p>	<p>The LBS in no way restricts any existing enjoyment of any private land. When land use changes, development or subdivision is proposed over private land the LBS will be used to assist with determining specific applications.</p> <p>The LBS does not (and cannot) take precedence over any vegetation clearing requirements under the Environmental Protection Act 1986.</p> <p>The Waggrakine Rural-Residential Structure Plan approved by Council and the WAPC facilitates subdivision and addresses the vegetation issues associated with subdivision applications.</p> <p>Claims of properties being "devalued" are unsubstantiated.</p>	Dismiss Submission
		<p>The Strategy penalizes those landowners who have protected and nurtured their land and reward those who have degraded and mismanaged their land.</p>	<p>The LBS does not "penalize" nor "reward" any specific landowners but rather provides for strategic assessment of biodiversity remaining in a local area. It provides for assessment of ecological values, consideration of opportunities and constraints and identifying relevant actions and mechanisms across all land tenures.</p>	Dismiss Submission

**Geraldton Local Biodiversity Strategy (LBS)  
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Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		<p>As landowners in the conservation areas will not have full use of their land under this plan, it is assumed that there will be an adjustment to the formula used to determine rateable value of the land. Will this be case and what are the guidelines?</p>	<p>The LBS in no way restricts any existing enjoyment of any private land. When land use changes, development or subdivision is proposed over private land the LBS will be used to assist with determining specific applications.</p> <p>The LBS does not (and cannot) take precedence over any vegetation clearing requirements under the Environmental Protection Act 1986.</p> <p>Claims of properties being “devalued” are unsubstantiated.</p> <p>Incentives offered through the LBS have yet to be listed in detail and cannot be done so until the document has been endorsed by Council.</p> <p>An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a ‘Biodiversity Conservation Incentives Strategy’ for private land as recommended in the LBS.</p>	Dismiss Submission
		<p>Will the City undertake compensation to private landowners for the devaluation of their property caused by the rezoning to conservation?</p>	<p>The LBS does not alter any zoning of property and in no way restricts any existing enjoyment of any private land. When land use changes, development or subdivision is proposed over private land the LBS will be used to assist with determining specific applications.</p> <p>Claims of properties being “devalued” are unsubstantiated.</p>	Dismiss Submission

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued		Will the City compensate or reward landowners in the conservation area with a reduction in rates without covenants for the burden of conservation that will be placed in them and not the rest of the community?	An action of the LBS is to develop and support an incentive program for private landholder conservation. The City is preparing a project brief to engage a consultant in 2013/14 to draft a 'Biodiversity Conservation Incentives Strategy' for private land as recommended in the LBS. Possible rate reductions may well be considered as part of those incentives.	Note Submission
		<p><u>Timing and method of distribution of the proposal</u></p> <p>The advertising period over the Christmas break restricts the capacity of potential respondents to lodge a submission and at worst, is a direct endeavour to reduce the likely number of submissions. This is the same method the City used to advertise the Waggrakine Rural-Residential Structure Plan and was forced to extend the submission period. Why has the City rushed this to release this draft over the Christmas period?</p>	Council resolved at its Meeting held on the 28 <sup>th</sup> August 2012 to advertise the strategy for a period of 42 days. Taking into consideration the advertising period fell over the festive season, the City extended the advertising period to 66 days. Further to this, submissions were received and accepted up until 19 <sup>th</sup> February 2013. Therefore, the advertising period was for 85 days (2 months and 25 days) which is considered acceptable.	Dismiss Submission
		It took me until the 29 <sup>th</sup> January 2013 to schedule a meeting with officers in this project with submissions closing 31 <sup>st</sup> January 2013 giving me no time to properly prepare my response.	<p>The City received correspondence from Mr Blaney MLA stating that his 'constituent' was in town from the 9<sup>th</sup> to 15<sup>th</sup> January then away until 23<sup>rd</sup> January 2013. The City responded explaining that key City staff (due to annual leave) were not available to meet until 14<sup>th</sup> January 2013. No response was received.</p> <p>Mr Blaney's office was contacted again via phone on the 14<sup>th</sup>, 21<sup>st</sup> and 23<sup>rd</sup> January 2013 with no response until 29<sup>th</sup> January 2013 when Mr Blaney's office returned the City's email with a meeting request for the 30<sup>th</sup> January 2013.</p>	Dismiss Submission

**Geraldton Local Biodiversity Strategy (LBS)  
Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
10 Continued			<p>During this meeting the City extended the submission period for this particular resident a further 5 weeks until the 8th March 2013. It should be noted that, although the submission was dated 19th February 2013, it was not received by the City until the 18th March 2013. Ample time has been afforded to make a “proper” response.</p>	
		<p>I ask the following to be undertaken by Council:</p> <ol style="list-style-type: none"> <li>1. Detailed and accurate written response to be provided to my questions listed above, 7 days prior to the close of the submission period.</li> <li>2. That the City provide the full added cost to ratepayers of this project to all Geraldton ratepayers formally.</li> </ol>	<p>The process of reviewing public submissions and adoption of the LBS is:</p> <ol style="list-style-type: none"> <li>1. Once the submission period closes a schedule of submissions and a report containing all the information received during the advertising period is provided to Council.</li> <li>2. All submitters are notified of when the matter will be presented to Council.</li> <li>3. Council will then make a final determination on the submissions and also the LBS itself.</li> <li>4. Once that decision of Council is made a response will be provided on the questions raised.</li> </ol> <p>The LBS has a series of recommendations only which are not presently costed or included in the current budget. Should Council determine to implement any of the recommendations the financial and budget implications will be detailed at that time.</p> <p>It should be noted that adoption of the LBS does not commit Council to any of the recommendations but does allow for the recommendations to be funded out of the annual budgeting process.</p>	<p>Note Submission</p>



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Schedule of Submissions**

Submission Number & Date	Submitter	Nature of Submission	Comment	Recommendation
11 (31/01/13)	Department of Environment and Conservation	<p>DEC supports the draft LBS and commends the Shire and City for this initiative.</p> <ul style="list-style-type: none"> <li>• Page 53: the dot point ending in 'vesting with DEC' should read 'vesting with the Conservation Commission and managed by the DEC'.</li> <li>• Pages 8 and 10: the estimated cost of restoration or regeneration is stated as \$250,000 per hectare, on page 10 this is referenced as a personal communication with Ecoscape 2011 and DEC 2011. This figure is not supported by the DEC and the personal communication reference to DEC should be removed.</li> </ul>	The modifications suggested by the DEC are considered to be minor in nature and would improve the accuracy of the document.	<p>Uphold Submission</p> <p>The dot point ending in '<i>vesting with DEC</i>' on page 53 should read '<i>vesting with the Conservation Commission and managed by the DEC</i>'.</p> <p>Remove any reference to the cost per hectare to restore or regenerate native vegetation on pages 8 and 10.</p>