



18 December 2015

Sustainability Fund Priority Statement Review
Department of Environment, Land, Water and Planning
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Melbourne VIC 8002
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Ask for: Kathleen McClusky
Phone: 9932 1004
Our Ref: A2255957

Dear Sir/Madam,

Response to the Draft Sustainability Fund Priority Statement

Council welcomes the opportunity to contribute to the Draft Sustainability Fund Priority Statement.

Responses to questions outlined in the online submission form are provided in the attached document.

If you would like to discuss this submission further, please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmccclusky@hobsonsbay.vic.gov.au.

Yours sincerely,

Natalie Walker
Director Strategic Development



Draft Sustainability Fund Priority Statement 2015 (November/December 2015)

Overall the Draft Sustainability Fund Priority Statement provides clarity to the types of initiatives for Victorian Government investment and how these investments are to be guided through the strategic direction of various Victorian Government policies, plans and strategies.

Council supports investment by the Victorian Government into initiatives that benefit all Victorians but also to sectors of the community with specific needs.

Council's response provides background to this support and examples of where funding could be invested to achieve strategic priorities. Council understands that this submission process is not one whereby funds are to be sought through but it has provided examples for consideration for future Victorian Government strategic investment.

Response to the investment priorities that have been chosen to foster environmentally sustainable uses of resources and best practices in waste management to advance the social and economic development of Victoria.

Strategic Priority 1: Making alternatives to landfill more viable and cost competitive through stimulation, creation and expansions of viable markets for recycled and recovered resources

Strategic Priority 2: Facilitates a network of best practice waste and resource recovery infrastructure which minimises public health and environmental impacts and maximises resource recovery opportunities

Council supports these two strategic priorities for Victorian Government investment. These priorities are particularly important to Council in the context of food waste recovery and avoidance. In Victoria food waste makes up approximately 36 per cent of the household garbage bin. The Victorian Government has established the strategic direction through the State-wide Waste and Resource Recovery Infrastructure Plan and Organics Victorian Strategy which without Victorian Government support will be a challenge for local government to achieve. In September 2015 the Victorian Organics Strategy was released. This strategy is also a 30 year plan but includes the first five year actions. Of particular interest to Council is the actions that confirms Victorian Government support to local government and industry to build capabilities to manage organic waste and to promote food waste avoidance. These are as follows:

- prepare a guide to organics waste collection services
- undertake economic modelling to consider options for organic waste management
- produce procurement guidelines that consider the supply chain, transport systems, processing and treatment options and end market uses
- increase community and business awareness of food waste and promote food waste avoidance

The Victorian Government, led by the Metropolitan Waste and Resource Recovery Group (MWRRG) and supported by Sustainability Victoria, has drafted a Metropolitan Waste and



Resource Recovery Implementation Plan (Implementation Plan) to capture the needs and priorities of each region of metropolitan Melbourne.

Actions related to landfill alternatives and best practice waste and resource recovery facilities that are of particular interest to Council are as follows:

- group procurement of residual waste processing
- build the metropolitan organics processing network and maximise the networks' productivity by accepting household and commercial food waste
- the protection of buffer separation distances for waste and recovery facilities
- support small onsite organic processing infrastructure
- establish relationships between food waste generators and organic processors

Council recently considered a report on food waste resource recovery opportunities in Hobsons Bay. It concluded that options will require investment into bin and processing infrastructure and community education. The report concluded that food waste recovery activities are not likely to be met individually by Council and will require partnerships with other organisations and/or councils. Activities will also require leadership and the right policy and economic framework from the Victorian Government, investment from the private sector and procurement management by the MWRRG.

Victorian Government investment is welcomed by Council specifically into research and development into organics collections systems and options and procurement support. More specifically financial assistance would be beneficial to implement desirable changes to organics collection systems to reduce the financial burden on communities. In addition Victorian Government investment in food waste avoidance programs such as the Love Food Hate Waste program is essential.

Strategic Priority 3: Providing equity in access to, and reducing the impacts of, waste and resource recovery services on communities

Council supports this strategic priority for Victorian Government investment. Locally, odour, dust and noise issues have been a concern for residents living in Brooklyn, Altona North, Laverton, South Kingsville and Newport. The predominant source of these issues has come from the Brooklyn Industrial Estate, commonly referred to as the 'Brooklyn Triangle' which is a parcel of land situated in the City of Brimbank, bordering the City of Hobsons Bay and the City of Maribyrnong. There are approximately sixty businesses operating in the Brooklyn Triangle which include: quarrying, shipping container yards, demolition yards, recycling depots, transport logistics, abattoirs, tallow producers and hide processors.

Based on fixed air pollution monitors, the Brooklyn area demonstrates a high particulate matter level (PM10). This has been the case for many years, especially in high winds. The Brooklyn Triangle is one of Victoria's worst pollution black spots. In response to these issues and in an attempt to create some sustainable change, for at least 10 years the local communities of Hobsons Bay have raised amenity issues with the EPA and industries operating in the Brooklyn Triangle via the Brooklyn Community Reference Group (BCRG).



The BCRG was initially largely funded by the Environment Protection Authority (EPA). In recent years the EPA and neighbouring councils have jointly funded the forum. The polluting industries do not contribute to the forum funding, nor did they contribute to the recent Jones and Bunting Roads improvement works which likely improved their property values.

Council is concerned that, despite the best efforts from all concerned, dust, odour and noise issues continue to adversely impact upon residents in Brooklyn, Altona North, Laverton, South Kingsville and Newport. In its submission to the Ministerial Advisory Committee for the inquiry into the EPA, Council sought stronger involvement of the EPA in community engagement, data collection, enforcement activities, and the implementation of strategies to reduce odour, dust and noise impacting the health and wellbeing of residents. In addition Council sought stronger partnerships across Victorian Government departments including Department of Health and Human Services, Department of Economic Development, Jobs, Transport and Resources, and Department of Environment, Land, Water and Planning (DELWP).

Victorian Government investment from the Sustainability Fund in this area could fund a strategic project over a number of years including leading the development and implementation of a strategy to address these sensitive issues with stakeholders including local government and the community.

Providing equity in access to waste and resource recovery services to communities is important to Council particularly for those services that are outside the scope of the municipal household kerbside waste and recycling service. This is because there is limited public access to such facilities within Hobsons Bay meaning residents and businesses have to travel outside the municipality to dispose of waste appropriately or to recycle. Innovative ways to provide regular services to communities like Hobson Bay is essential.

An example of this in Hobsons Bay is Sustainability Victoria's Household Chemical Collection program which since 2014 has been provided at Council's depot in Altona.

Strategic Priority 4: Modernising the management of legacy contamination or pollution

Council supports this strategic priority for Victorian Government investment. Encroachment of competing land uses such as residential onto landfill is a significant issue for councils and landfill operators. In addition legacy landfill uses pose challenges for decisions about future land uses.

With reference to encroachment, the MWRRG will deliver the Local Government Buffer Support Program over four years (2014-17) in collaboration with local government, and key Victorian Government agencies. This program aims to support local government to respond to land use planning challenges and opportunities with existing waste and resource recovery facilities. It will also develop land use planning policies, tools and controls to define, protect and maintain buffers to these facilities. These policies, tools and controls will ultimately become part of the Victorian Planning Provisions. Continued Victorian Government support for this initiative is imperative.



Legacy landfill issues are a particular concern for Council. Contaminated land, coupled with the issues of landfill gas that extend beyond the boundaries of legacy landfill sites, create significant issues when planning for the municipality. There is limited policy framework or statutory process to assist with land use planning decisions affected by this issue. Council is investigating historical landfill sites within the municipality before establishing a policy to assess land use applications which may be affected by these sites. In its submission to the Ministerial Advisory Committee for the inquiry into the EPA, Council sought assistance from the EPA to recommend and support tools and provide information that will assist with decisions.

This issue is not isolated to one council and is expected to increase over time as land uses change. Therefore it would be beneficial if the Victorian Government invested in a centralised Government coordinated program that included research into the issue including collation of information and mapping, a literature and legislative review, benchmarking locally, nationally and internationally, the development of planning policies and tools, training programs and recommendations for future action. The initiative would include collaboration with local government and government agencies including the EPA, DELWP and regional waste and resource recovery groups. This concept could be funded through the Sustainability Fund as a strategic project over a number of years.

In addition financial support to councils, like Hobsons Bay, that have or are encountering significant landfill legacy issues of the more distant past would be beneficial. These include public landfills that have been closed for some time and managed within standards set in the past and different to those of today as set through the Landfill Best Practice Environmental Management Guidelines (Landfill BPEM). An indicative cost to research and develop options and clean up contaminated landfill is estimated in excess of \$1 million per legacy landfill.

Response to the investment priorities that have been chosen to foster community action or innovation in relation to the reduction of greenhouse gas substance emissions [mitigation] or adaptation or adjustment to climate change in Victoria.

Strategic Priority 1: supporting individuals, communities and industry to transition to a low carbon economy

Council supports this strategic priority for Victorian Government investment. Supporting individuals, communities and industry to transition to a low carbon economy is of critical importance to limit the adaptation measures that will be required in the future. Council has developed both a Corporate Greenhouse Strategy 2013-20 and a Community Greenhouse Strategy 2013-30 to show leadership by reducing its own emissions and assist the community to reduce their emissions.

The Corporate Greenhouse Strategy provides the framework for Council to become carbon neutral in its operations by 2020. Undertaking actions, even when closely aligned with existing new capital works and renewal activities, is expensive; in particular in a tightening fiscal environment. The Corporate Greenhouse Strategy suggests that the pathway to zero net emissions will cost in the order of \$900,000 per annum. The community looks to and expects their local government to show leadership. Financial



support to councils, like Hobsons Bay, that are continuing work to reduce their own emissions would be beneficial.

Council has an important role in enabling, engaging and encouraging the local community to move to a low carbon future. The Community Greenhouse Strategy has been developed to support individuals, communities and industry to reduce their greenhouse gas emissions (GHG). This strategy allows Council to consider actions toward this broad goal and, in particular, to achieve the objective of becoming a zero net emissions community by 2030. The strategy outlines a series of emission reduction actions to achieve its ambitious community target and outlines the role of carbon offsets. Actions include promotion of existing energy efficiency resources such as Victorian Government grant opportunities.

The actions are broadly divided between programs to reduce GHG emissions, and delivery mechanisms including arrangements or structures which guide or manage the implementation of GHG emission reduction initiatives or projects. Each action was developed after a review of best practice government carbon reduction approaches both in Australia and overseas. When combined these actions have the potential to reduce community emissions in Hobsons Bay by over 340,000 tonnes of GHG emissions per annum by 2030.

Council is actively progressing this strategy with business, industry and residential programs that include transport and building energy reduction initiatives. In addition, Council is working regionally in partnership with the Western Alliance for Greenhouse Action (WAGA) councils to implement the Low Carbon West Strategy developed in collaboration with Lead West, Regional Development Australia and Victoria Western Melbourne.

Financial support to councils, like Hobsons Bay and regional alliances like WAGA, that are continuing work to support individuals, communities and industry to transition to a low carbon economy would be beneficial.

Strategic Priority 2: supporting Victorians to adapt to the impacts of climate change, particularly those most vulnerable and least able to do so

Council supports this strategic priority for Victorian Government investment. In recent decades Australia has experienced observable climatic changes including an increase in average temperatures and the frequency of hot nights, extended periods of reduced rainfall and sea level rise. Council has acknowledged the importance of preparing for the inevitable impacts of climate change adopting a Climate Change Policy 2013.

Council has undertaken a risk assessment and developed a Climate Change Adaptation Plan (Adaptation Plan). Council is also currently reviewing its Open Space strategy which has identified significant impacts on open space, the environment (particularly habitat and coastal processes) and the community's health and wellbeing as a result of climate change.

The Adaptation Plan incorporates existing work Council is already undertaking, including the following:



- community engagement activities regarding climate change impacts
- adaptation plans developed for specific issues such as heat waves
- efforts to improve environmental sustainability, which will also increase climate change resilience

The Adaptation Plan's actions address the following broad areas:

- community resilience to increased extreme events
- the climate resilience of essential infrastructure
- the long term protection and enhancement of public open space
- water and energy security and other sustainable design issues
- the management of coastal assets at risk from flooding

The Adaptation Plan is focussed on Council's operational control and is not designed to be a plan for how the Hobsons Bay community should take action. However, the Adaptation Plan acknowledges that the community, and other levels of government, will need to be engaged in building the municipality's resilience to climate change impacts. It also clearly identifies that increased temperature and extreme heat days are likely to affect the distribution and severity of public health related risks. At risk members of the community (e.g. elderly, sick, young and economically disadvantaged) will require greater levels of Council support through emergency management and community services. Climate change is expected to change rainfall patterns and increase temperatures, deteriorating sports grounds as a result of flooding, ground compaction and loss of vegetation. Predicted sea level rise will cause loss of open space and assets along foreshores. Increased extreme weather conditions such as drought, storms, bushfires, and flooding will have significant impact on open space vegetation, amenity, facilities and access. Climate change may affect a range of community facilities that assist to maintain the community's health and wellbeing including, open spaces, play spaces and street trees.

The municipality has 27.4 per cent of its land area covered by open space, which includes significant tracts of environmental and culturally significant landscapes and 23 kilometres of coastline. These assets assist in addressing some of the matters associated with the heat island effect. The amount and resources required to protect this amount of open space is challenging for Council and it will be critical to work with other agencies to mitigate the impacts of climate change and manage these spaces for the health and wellbeing of the community.

There are areas where significant gaps in open space provision occur which are; Altona Meadows, Altona North, Brooklyn and Spotswood. Spotswood/South Kingsville and Altona North have the most disadvantaged residential population where nearly 34 per cent of people do not have access to open space within 500 metres of their home or workplace. Hobsons Bay also has low tree cover compared to many inner ring suburbs. It is one of three out of 14 municipalities with below 10 per cent land area vegetated with trees¹. With increasing temperatures combined with increasing urban density and loss of vegetation the urban heat island effect is a significant issue for the Hobsons Bay

¹ Horticulture Innovation Australia 2014

http://202020vision.com.au/media/7145/where_are_all_the_trees.pdf



community. Research and ongoing studies confirm that the addition of trees and vegetation in the built environment provides the greatest benefit in terms of mitigating the urban heat island effect².

Water harvesting can reduce flooding by slowing and collecting water and provide an alternate source of water for landscapes to cool the environment, and sustain habitats.

Much of the 23 kilometres of coastline are unprotected from erosion, storm damage and flooding. Physical loss of open space and loss of sand is a key threat to open space in Hobsons Bay. Revetments and seawalls are commonly used to protect these assets, however many open spaces in coastal areas are still vulnerable to recession.

Council has identified its vulnerable coastal assets and a range of protective strategies are currently being explored as well as governance responsibility for delivering and maintaining these assets. Protecting the coastline is a joint agency and government approach as it is an issue of greater magnitude than just for Hobsons Bay.

Financial support to councils, like Hobsons Bay and regional partnerships such as Greening the West and WAGA, that are continuing work to support their communities to adapt to the impacts of climate change and maintain their health and wellbeing and protect open space would be beneficial.

Examples where the Sustainability Fund could be invested into open space protection include the following:

- coastal infrastructure protection i.e. revetment walls
- street tree planting along key walking and cycling routes which also link habitats
- heat mapping of the urban environment
- flood mitigation and management including slowing of floodwaters
- environmental water management options such as wetlands and water sensitive urban design treatments
- securing non potable water sources for managing landscapes

Strategic Priority 3: assisting Victoria's ecosystems and native species to be more resilient to climate change and/or support mitigation outcomes

Council supports this strategic priority for Victorian Government investment. Recent community consultation during the development of the Council Plan 2013–17 and Community Health and Wellbeing Plan 2013-17 highlighted that residents consider coastal locations, parks and green spaces, protecting the environment and addressing climate change to be a high priority. This indicates a community wide belief that environmental management should be a priority for Council.

Council acknowledges the reality of climate change by adopting a Climate Change Policy 2013. Council is also currently developing a Biodiversity Strategy to provide a pathway to help protect and manage our existing biodiversity assets.

² Melbourne City Council 2012 Urban Forest Strategy in Parks and Leisure Australia 2013 *Open space planning and design guide* Pg 112



Open spaces in Hobsons Bay contain large areas of significant habitats for plants and animals including; coastal areas, mangroves, salt marshes, wetlands, grasslands, and creeks that support native wildlife, including rare and endangered species, particularly marine birds, migratory birds and waders. One of the most significant ecosystems in Hobsons Bay is the Cheetham Wetlands, which is internationally recognised under the Ramsar Convention 1971.

The impacts to biodiversity in Hobsons Bay caused by climate change are likely to include the following:

- flooding and its impacts on biodiversity assets, waterways and water bodies, including permanent loss of key coastal vegetation and habitat for fauna. The close proximity of industrial areas to waterways and high value biodiversity assets could also result in pollution issues during times of flood or drought, which particularly impacts on Saltmarsh areas and the broader coastal and estuarine ecosystems
- providing refuges for fauna and invertebrates such as wetlands and other natural areas for migratory and non migratory birds and other fauna in times of drought and extreme weather events³ or when their environmental conditions change over time
- dieback of some existing remnant vegetation and replacement with other species, including weed species, due to a drier climate
- functionality and amenity values of wetland areas will decrease if there is not enough water run off to sustain these to the required levels
- potential increase in man made structures such as rockwalls and groynes to keep water away from developments which may have a negative impact on the coastal flora and fauna

To ensure that biodiversity is protected as the climate changes it is important to:

- ensure that there are spaces outside of the flood plain that fauna can retreat to in times of flood
- engage with industry and relevant government agencies, such as the Environment Protection Authority Victoria (EPA), to ensure that key conservation areas are not negatively impacted by industry
- consider biodiversity when developing Council works such as any potential stormwater harvesting projects and flood management initiatives
- strengthening existing biodiversity values through revegetation, regeneration, and protection measures to encouraging species diversity which is resilient to drought and flood conditions
- ensure that there is good connectivity between key conservation areas, along waterways and streets enabling species to migrate over time
- protect and maintain areas of remnant vegetation and reduce the presence of weeds to enable indigenous species to adapt with less competition

³ VEAC 2011 *Metropolitan Melbourne Investigation* Pg 28



Financial support to councils, like Hobsons Bay, that are continuing work to protect and manage biodiversity assets of Victorian and Australian significance would be beneficial.

Examples where the Sustainability Fund could be invested into open space and biodiversity protection include the following:

- weed and pest removal works to improve the resilience of the flora and fauna
- revegetation and regeneration programs for conservation areas including fencing, education, management, planning and planting
- development of management plans to assist in understanding the threats to the environment and developing long term strategies to improve resilience

Other comments about the draft Sustainability Fund Priority Statement

Each of the strategic priorities to foster community action or innovation in relation to the reduction of greenhouse gas emissions (mitigation), adaptation or adjustment to climate change in Victoria have individual merit. However, Council stresses that support for Strategic Priority 1, with reference to climate change and greenhouse emissions reduction, is of critical importance to limit the adaptation measures that will be required in the future.

The repeal of the relevant section of the *Environment Protection and Sustainability Amendment Act* resulted in the cessation of the Sustainability Fund Advisory Panel on 30 June 2015. The DELWP website states that the guidelines for Sustainability Fund Priority Statement will also be reviewed. This seems to be absent from this review process. Given that the Advisory Panel has been repealed, Council considers it important that the guidelines are also reviewed to ensure that the process for allocation and reporting of funds is clear and transparent.