




# Victorian National Parks Association Inc

# Environment Victoria

# The Wilderness Society

**Submission in response to**:

## Victorian Environmental Assessment Council

## Metropolitan Investigation Discussion Paper

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## INTRODUCTION

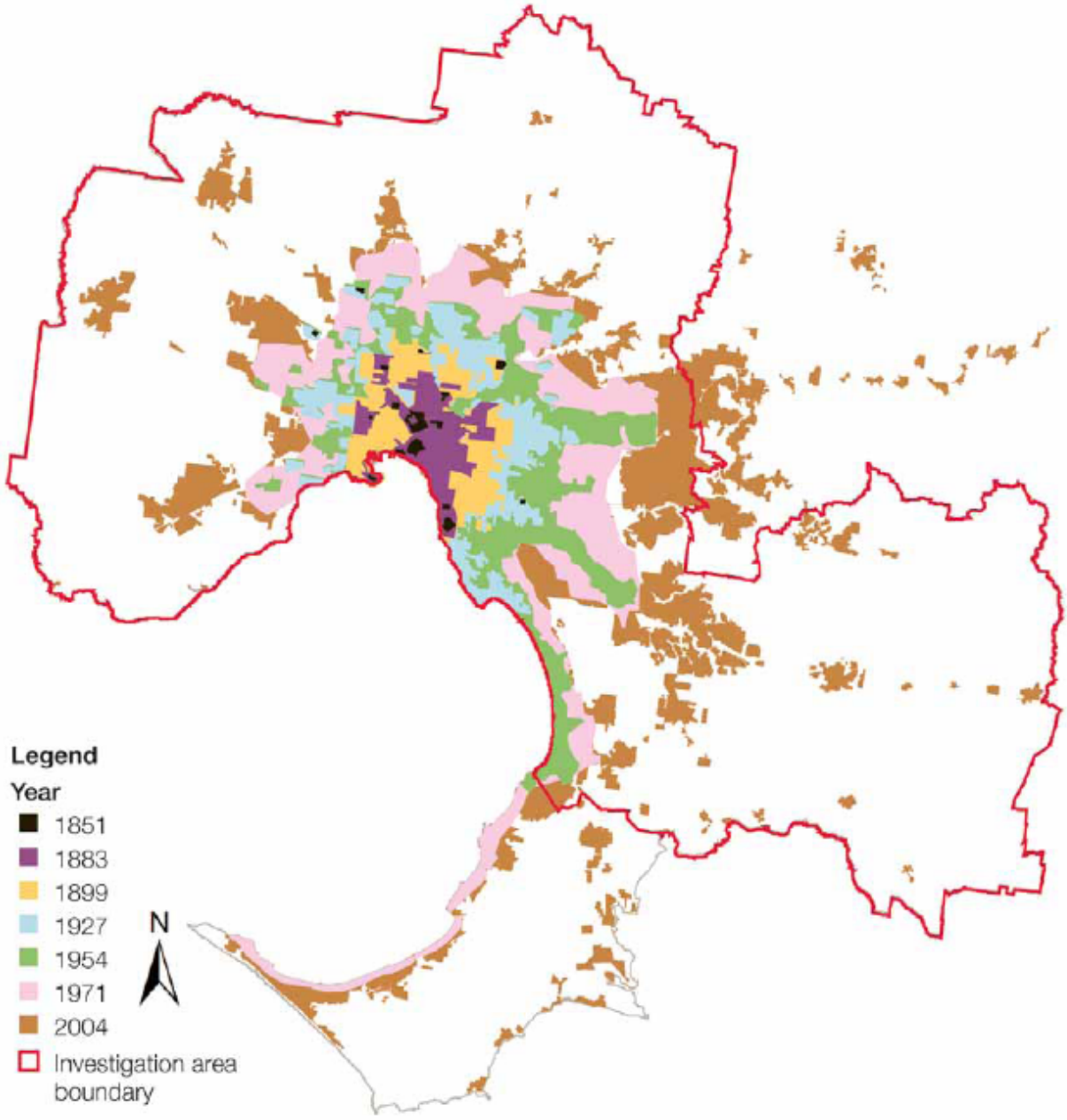
This joint submission is in response to the Victorian Environmental Assessment Council's invitation for public comments on the *Metropolitan Melbourne Investigation Discussion Paper*. The Victorian National Parks Association, Environment Victoria and The Wilderness Society appreciate the oppportunity to submit comments on this draft discussion paper, and to assist in establishing future directions for metropolitan Melbourne Crown land and public land use.

This submission is separated into seven sections, with summary recommendations at the end of each.

## 1) METROPOLITAN SUSTAINABILITY

One of the principal pressures on Melbourne's public land is the continued expansion of Melbourne's population and urban footprint. The scattered and decentralised nature of the expansion of the city's urban boundaries is clearly shown in Figure 3.4 of the Discussion Paper. Melbourne's relentless expansion has local environmental impacts on the areas that are developed, and also increases the city's environmental footprint as people and goods use more energy to travel further around and within it.

**Figure 3.4**
Melbourne's urban development (1851 to 2004)
*Source: Department of Planning and Community Development.*[4]




Planning strategies for Melbourne have largely failed to drive more compact and sustainable development and therefore limit impacts on public land. *Melbourne 2030* aimed to accommodate one million more people by 2030. It allowed for some growth of the urban area, and, in doing so, established the existing urban growth boundary. However, *Melbourne 2030* concentrated on accommodating additional population in activity centres in existing urban areas, most of which are centred on train stations.

A recent study examined the capacity for population growth along tram and bus corridors to augment *Melbourne 2030*.[i] This study found that, using only 3% of the available urban land, 840,000 more people could be accommodated. Urban consolidation around train stations, and

tram and bus corridors within the existing urban growth boundary, would easily accommodate the projected growth in population and ease pressure on public lands. Environment groups support this approach to accommodating population growth because it is less expensive and has a much lower environmental impact than urban sprawl.

Conversely, development in outer suburban areas needs enormous amounts of energy and resources to build, maintain and use new infrastructure. Outer suburban development also increases the urban footprint and alienates land with agricultural or biodiversity values.
In the absence of a seriously funded and properly managed and run public transport system, outer suburban development further entrenches car dependency. The annual cost of transport in outer urban development is estimated to be almost twice as much as in existing urban areas.[ii]

The increased infrastructure and transport costs for new outer-suburban developments also represent an increased greenhouse gas liability. Compared to developments in existing urban areas, outer suburban developments emit more greenhouse gases during their construction, and then during their occupancy.

The increase in urban area also means a loss of carbon sinks and an increase in the heat-island effect.

In short, increased urban sprawl is expensive and unsustainable, increases Victoria's greenhouse gas liability, and impacts on the values of public land.

**Recommendations**

- **The Victorian Government should commit to sustainable land use planning and design, and urban consolidation, to facilitate reduced travel demand.**
- **The Victorian Government should introduce a moratorium on new major road projects, and instead direct this funding towards public and sustainable transport alternatives.**
- **The Victorian Government should recommit to principles of urban consolidation, and reverse its decision to expand the Urban Growth Boundary.**
- **The Victorian government should continue with plans to redevelop Central Activity Districts across the city, and consolidate additional growth along on-road sustainable transport corridors such as tram and bus routes, with mixed-use developments including a percentage of affordable housing.**
- **To ensure that transport emissions are not disproportionately increased by new development, the Victorian Government should commit to no new development without adequate sustainable transport infrastructure in place prior to development**.

## 2) STRATEGIC PUBLIC LAND DIRECTIONS

The Discussion Paper makes a strong case for the contribution of public land to Melbourne's liveability (Chapter 5, and Table 5.1). Urban consolidation and urban expansion are placing increasing pressures on both the public land resource (particularly public open space) and liveability. The public benefits and values of public land are only likely to increase in future, whether existing uses are maintained or land no longer needed for another designated public purpose can be converted to public open space.

The analysis of projected public open space per capita (6.7.5) "highlights the importance of taking opportunities to create areas of new public open space in areas of high and increasing ratios of population to public open space "(p.108). Such opportunities include conversion of 'surplus' public land to public open space.

The government policy that encourages sale of 'surplus' public land is therefore obsolete and should be discarded. The current arrangements for public authority freehold land are particularly objectionable: as noted in the Discussion Paper, the authority is not obliged to assess suitability for an alternative public purpose, nor to retain land with public land values.

Revenue-raising targets imposed on public agencies by Treasury for the sale of 'surplus' land should be removed immediately.

The proposals on p.135 relating to surplus public land are generally supported. One of the proposals is that public authority freehold land that is suitable for another public use be re/zoned and sold at a price that reflects its intended use. While this would be an improvement on current practice, it raises the question of why the community (via a Victorian or local government authority) should pay a second time for such land, which was presumably purchased using public funds in the first place. Public land should not be treated simply as a tradeable commercial asset.

**Recommendations**

- **The removal of government policy that encourages the sale of surplus public land.**
- **The proposals on p.135 relating to surplus public land are generally supported, but public land should not be treated simply as a tradeable commercial asset.**

## 3) COASTAL & MARINE

### Public land's role in mitigating and adapting to climate change

As stated on p.118 (??comments invited) we agree that vegetated public land plays an important role in both migitating climate change and adapting to its impacts.. However, there are no specific recommendations in the Draft Discussion Paper that refer to the need to build natural resilience in coastal areas to counteract the impacts of climate change.

Since 1991, successive Australian and Victorian government inquiries, taskforces, panels and reports have concluded that climate change will result in large-scale changes to coastal areas and unprecedented biodiversity loss.

Recent up-to-date mapping released by the Federal Government shows the impact of sea levels rising by up to 1.1m by 2100.[iii] Public land areas within this investigation scope that are highlighted to be particularly under threat to climate-change-driven sea level rise include Port Phillip Bay and Westernport. Low-lying areas around Westernport show very extensive inundation under the sea-level rise mapping scenarios.

As shown on p. 49 of the draft, coastal areas such as Ricketts Point (Beaumaris) are already experiencing coastal erosion form storms, and surrounding areas such as Portsea Beach are also under increasing threat. (Coastal erosion within Port Phillip Bay may also be linked to and accentuated by the the dredging of the Bay.)

The VNPA's Nature Conservation Review (NCR) has a summary of climate change implications for coastal ecosystems in the VEAC investigation area.[iv] The 'coastal defence' services provided by coastal vegetation such as mangroves and saltmarshs are also discussed.

As highlighted in the NCR review, coastal habitats at most risk from the impacts of climate change and rising sea levels include:

- **Intertidal habitats** – there will be a general reduction of the intertidal zone as sea-level rises and before new shoreline is cut. Many open coast rock platforms will be submerged. This will cause population reductions in many intertidal species.
- **Soft (muddy) habitats in our bays, i.e. mangroves and salt-marsh areas** could go locally extinct. These habitats are already of limited extent and threatened by urbanisation (coastal squeeze) around our major bays.
- **Estuarine habitats** will shift further up rivers (with rising sea level and falling rainfall) and potentially be pushed inro more degraded areas.
- **Land-based coastal ecosystems, communities, flora and fauna** – coastal vegetation (including grasses, heaths, woodlands, scrub and Moonah) and dunes are particularly important for building ecosystem resilience, and providing ecosystem processes and services.

In reference to the Marine Protected Areas covered in the VEAC investigation, the following points are outlined in the NCR review. (We do acknowledge that some of our comments relate to areas beyond the investigation boundaries and between high and low water mark).

*Yaringa Marine National Park*

Most stated objectives and values are encompassed by the present boundaries and level of protection as recommended by the Environmental Coastal Council within Yaringa Marine National Park. Saltmarsh, mangroves, sheltered intertidal mudflats and subtidal soft sediments channel habitats are represented within the park. However, objectives pertaining to protection of channel biota need to be revised to protect significant populations of sea-pens and species of 'living fossil'.

*Jawbone Marine Sanctuary*

Jawbone MS encompasses the core values of mangrove, shorebird and previously protected intertidal communities. The stated values of seagrass and mudflat habitats are poorly represented within this area and should not be included as core conservation –extensions to the boundaries are warranted to properly protect these values.

The close relationship of Australians to the coast results in extraordinary demand to allow new development in coastal areas. Protecting biodiversity on public land from immediate development, especially 'coastal squeeze', will build resilience to the impacts of climate change.

We believe a further VEAC investigation is warranted, since this present public land investigation mainly encompasses terrestrial areas. Marine and coastal ecosystems are inherently interlinked, particularly when considering the need to build shoreline resilience to climate change impacts.

This new VEAC investigation could be conducted on Port Phillip Bay as a stand-alone process or as part of a broader statewide marine and coastal review. The purpose of the investigation would be to update information on the ecological values of Port Phillip Bay, the threats to these values, and the way in which those values can be protected and the bay and its catchment used in an ecologically sustainable way.

The proposed new investigation can properly inform new public land and marine protection initiatives for Port Phillip Bay and other areas such as Westernport that occur within the VEAC Metropolitan investigation area.

**Recommendations**

- **Conducting, as a stand-alone Port Phillip Bay process or as part of a broader state-wide review, a comprehensive VEAC investigation into marine and coastal areas. This investigation would update information on the ecological values of Port Phillip Bay, the threats to these values, and the way in which these values can be protected and the bay and its catchment used in an ecologically sustainable way.**

## 4) PROTECTING NATURE CONSERVATION VALUES

### Conservation significance of the area

Section 2.3 of the Discussion Paper outlines the diverse natural environment of the region, which lies over the junction of three major geological formations. The investigation area has parts of six of Victoria's 28 bioregions, 85 of Victoria's 300 EVCs, 40% of Victoria's vascular plant species and 70% of fauna species. This diversity occurs in an area only 2.5% of the total area of Victoria.

Furthermore, the western and northern parts of the investigation area contain large areas of threatened native vegetation, with smaller areas in the south and east (Figure 2.9). These predominantly occur on private land and are generally poorly represented in the protected area system (p.39). Less than 15% of threatened vegetation communities are protected in metropolitan Melbourne.

### Movement pathways

The area is not only important as habitat for a diversity of plant and animal communities, but also for movement pathways. The region is crossed by significant north-south and east-west routes for fauna movement. In particular, many bird species traverse the area on regular migrations from the ranges, from northern Australia, across Bass Strait, or even from the northern hemisphere, or as nomads following food resources. Most of these require at least 'stepping stones' of habitat to move across extensive urban or cleared areas.

It is agreed that vegetated public land has an important role in adapting to climate change, including linkages for flora and fauna to move, recolonise and reconfigure (p.118). This applies not only to land with remnant vegetation; revegetated sites can provide valuable habitat for movement and recolonisation. So public land that is not currently vegetated has potential value in this regard.

The role of the metropolitan region as a drought refuge should be noted in the context of climate change. The area is relatively well-watered because large volumes of water are imported from other catchments (and in future, from the desalination plant). This enhances the potential to sustain water regimes required by threatened plants and to maintain food resources, such as nectar-bearing plants, for native fauna.

**Road reserves**

The conservation values of road reserves should be highlighted. Road reserves comprise a significant proportion of total public land in the investigation area (Table 4.1), although roadsides and unused road reserves with native vegetation would comprise a much smaller proportion. In addition to long-standing threatening processes, this vegetation is under increased threat in the name of fire protection.

**Conservation ahead of recreation**

In areas of high conservation value and important habitat links, nature conservation should be given a higher priority than recreation. This could mean restrictions on recreation activities such as mountain biking and dog-walking, and the location of paths and trails away from sensitive areas, or on only one side of a waterway.

**Recommendations**

- **To further emphasise of the role of vegetated and unvegetated public lands in providing movement pathways for flora and fauna.**
- **To include the role of metropolitan regions as providing drought refuge in the context of climate change.**
- **To highlight the conservation values of road reserves.**
- **That in areas of high conservation value and important habitat links, nature conservation should be given a higher priority than recreation.**

## 5) STRATEGIC PLANNING FOR AN OPEN SPACE AND PROTECTED AREA NETWORK

**Need for metropolitan-wide strategic planning and implementation**

The Discussion Paper notes (p.73) that "a strategic framework encompassing all types of public parklands in metropolitan Melbourne is lacking."

We support the suggestion that a metropolitan-wide public open space strategy should be developed (p.101). Such a strategy should not focus solely on the recreational uses of public open space, but should give equal weight to nature conservation. Protected areas, natural and semi-natural multipurpose areas and nature-based recreation areas comprise 40% of public open space within the urban growth boundary, and 76% across the investigation area.

As noted above, the metropolitan region contains high biodiversity, many sites of conservation significance, and many threatened species. Just as there is a need for vision, co-ordination and strategic planning of public open space for recreation, so is there an urgent need for these in relation to nature conservation.

Strategic planning for, and establishment of, an interconnected conservation reserve network across the region would form a lasting legacy that would enhance Melbourne's liveability as well as conservation values. The waterways and existing parks would form the core areas of this network. Vegetated habitat corridors would assist in restoring structural connectivity across fragmented landscapes (p.120). A single agency working at a regional/metropolitan scale should co-ordinate and drive this enterprise.

Recommendations by VEAC are required to facilitate the development of "a strategic, well planned and managed network of protected areas" that "is probably the most important strategy for reducing the negative impacts of climate change on biodiversity" (p.124).

Innovative measures should be investigated by VEAC, for example purchase of development rights, transfer of identified priority land at subdivision or planning permit stage, and better incentives/support for conservation covenants. A plan that identifies sites to be incorporated into the network is a fundamental pre-requisite to guide a process that would inevitably take decades to implement.

**Growth areas**

Strategic open space planning is very important for Melbourne's growth areas in order to identify and designate, ahead of urban development, an open space network that protects sites of conservation value and links for ecological connectivity, as well as sufficient accessible land for diverse recreation and cultural activities. Much of this open space network planning is appropriately done as part of growth area framework plans, although finer scale resolution is required at the level of precinct plans.

**Adding to the protected areas network**

The Discussion Paper identifies 'limited opportunities' to add to the public land estate. However, there is a need to establish new protected areas in the context of urban expansion. Extensive new grassland reserve to the west of Melbourne and a grassy woodland protected area to the north are proposed as part of the latest expansion of the urban growth boundary. Additional areas should be protected in growth areas and green wedges, whether through public acquisition, re-classification of public land, multi-purpose management, or conservation covenants on private land.

There is a need for the Victorian Government to allocate financial resources to accelerate the acquisition of land with Public Acquisition Overlays (6.9.2), particularly along waterways which are important conservation corridors.

We strongly support the proposals that open space should be protected by ensuring appropriate legal status is given to the land, and that open space should be protected from incremental loss of area (p.110).

**Resources for conservation management**

If the laudable aim of protecting natural habitats to enhance biodiversity and therefore liveability (Box 8.1, p.121) is to be achieved, then sufficient resources for management are required to deal with threatening and degrading processes including people pressures, and to restore and

revegetate degraded habitats. Secure ongoing funding arrangements are required for the management and maintenance of native vegetation remnants and revegetation sites in protected areas, along waterways and on private land in the Green Wedges.

**Recommendations**

- **We support the suggestion that a metropolitan-wide public open space strategy should be developed - such a strategy should not focus solely on the recreational uses of public open space, but should give equal weight to nature conservation. A single agency working at a regional/metropolitan scale should co-ordinate and drive this enterprise.**
- **Strategic planning for, and establishment of, an interconnected conservation reserve network across the region would be a lasting legacy that would enhance Melbourne's liveability as well as conservation values.**
- **Recommendations by VEAC are required to facilitate the development of a strategic, well planned and managed network of protected areas that is probably the most important strategy for reducing the negative impacts of climate change on biodiversity.**
- **Innovative measures should be investigated by VEAC, for example purchase of development rights, transfer of identified priority land at subdivision or planning permit stage, and better incentives/support for conservation covenants.**
- **Finer scale resolution is required at the level of precinct plans for open space network planning.**
- **There is a need to establish new protected areas in the context of urban expansion.**
- **There is a need for the Victorian Government to allocate financial resources to accelerate the acquisition of land with Public Acquisition Overlays (6.9.2), particularly along waterways which are important conservation corridors.**
- **We strongly support the proposals that open space should be protected by ensuring appropriate legal status is given to the land, and that open space should be protected from incremental loss of area.**
- **Secure ongoing funding arrangements are required for the management and maintenance of native vegetation remnants and revegetation sites in protected areas, along waterways and on private land in the Green Wedges.**

## 6) MULTIPLE USE OF PUBLIC LAND

School grounds offer an important opportunity to increase the provision of outdoor space for children's play and informal recreation after school hours, particularly in many inner and middle suburbs where there is a shortage of accessible local public open space within walking distance of all homes. Local councils have negotiated agreements with some individual schools to contribute to maintenance of grounds, in return for public access, but this is cumbersome to negotiate on a one-by-one basis.

Logically there should be a statewide policy and guidelines, encouraging and setting appropriate terms and conditions for public after-hours use of government school grounds and facilities. A template for agreements with local councils could be provided.

We support the more general proposal (p.113) that multiple use of public authority land should be encouraged as a means of providing additional public open space in metropolitan Melbourne. In a similar vein, public authority land with conservation values should be managed to protect and enhance those values.

**Recommendations**

- **There should be a statewide policy and guidelines encouraging and setting appropriate terms and conditions for public after-hours use of government school grounds and facilities.**
- **We support encouraging the multiple use of public authority land as a means of providing additional public open space in metropolitan Melbourne.**

## 7) DRAFT PUBLIC LAND USE RECOMMENDATIONS

### a) Yarra Valley Parklands

A portion of the Yarra Valley Parklands upstream of Fitzsimons Lane is eminently worthy of the increased protection of State Park status. We urge VEAC to recommend that this section of the Yarra Valley Parklands be added to the adjoining Warrandyte State Park. We recognise that a name change may be necessary for such an expanded park.

**Biodiversity**

The main reason for our view is the outstanding biodiversity value of the area. A substantial portion consists of high-quality bushland in a near-natural state.

There are 29 recorded flora species listed as rare or threatened in Victoria, and these include four species listed under the Flora and Fauna Guarantee (FFG) Act: the rosella spider orchid *Caladenia rosella*, the flax-lily *Dianella amoena,* clover glycine *Glycine latrobeana* and the water starwort *Callitriche brachycarpa.*

There are also 31 rare or threatened fauna species, of which 20 are listed under the FFG Act. These include the grey goshawk *Accipiter novaehollandiae*, the powerful owl *Ninox strenua* and the brush-tailed phascogale *Phascogale tapoatafa.*

Five threatened Ecological Vegetation Classes occur in this section of the Parklands: Valley grassy woodland, Gully woodland, Creek-line herb-rich woodland, Creek-line grassy woodland and Plains grassy woodland.

**Historical significance**

In addition to these natural attributes, this section of the parklands contains important Aboriginal cultural sites such as scar trees, artefact scatters, a stone eel-trap in the Yarra River and a kitchen midden. The Pontville homestead, listed on the Victorian Heritage Register, is also located here.

**Revegetation**

In the past, some of the land upstream of Fitzsimons Lane now included in the Yarra Valley Parklands was used for agriculture. But over the last twenty years or so a major planting program has revegetated much of this land, so that it now provides a vital corridor for movement of wildlife, including such large species as eastern grey kangaroos and koalas. It offers a rare opportunity for people to see such wildlife so close to Melbourne.

**Management**

Parks Victoria has recently brought this section of the Yarra Valley Parklands under the management of the Warrandyte State Park office. It would be logical and practical that it should be managed under the same legislation.

**Recommendations**

- **We recommend that VEAC add a portion of the Yarra Valley Parklands upstream of Fitzsimons Lane to the adjoining Warrandyte State Park.**

**b) Bunyip State Park**

We consider that the 2,340 ha of land in the Upper Bunyip State Forest, inside the boundary of Metropolitan Melbourne Investigation area and adjoining Bunyip State Park and Kirth Kiln Regional State Park, be made a Nature Conservation Reserve under the National Parks Act 1975, in order to best manage the area for the conservation of nature.

This recommendation is made in recognition of the following features of the Upper Bunyip area:

- **Identified as a site of national botanical significance** by the Department of Conservation and Environment's 1991 *Statement of Resources, Uses and Values, Dandenong (Yarra Forests) Forest Management Area.*
- **Identified as a site of national and local zoological significance** by the Department of Conservation and Environment's 1991 *Statement of Resources, Uses and Values, Dandenong (Yarra Forests) Forest Management Area.*
- **Identified as a rainforest site of regional significance** by the Department of Sustainability and Environment
- **Proclaimed water supply catchment** in VEAC's 'Current public land use in the Metropolitan Melbourne Investigation area' map, *Metropolitan Melbourne Investigation Discussion Paper, 2010.*

Figure 2.8 in VEAC's 2010 in the Discussion Paper identifies the Upper Bunyip area as a large area of 'high quality' vegetation. Given that only 5.3% of the current Melbourne Metropolitan study area is protected, priority should be given to managing the Upper Bunyip for conservation purposes.

**Site of National Botanical Significance**

According to Opie et al., "Of the 45 sites of botanical significance described in this report, one, the Upper Bunyip River site, is of national significance**...**"[v]

The Upper Bunyip is home to a range of threatened species, including the Tall Astelia (*Astelia australiana*), the state significant species *Tmesipteris ovata* and *Lastreopsis hispida*, and the only known stands of *Callistemon pallidus* and *Eriostemon myoporiodes* in the Westernport Region.[vi]

It is believed the endemic Tall Astelia has declined severely since European settlement, with only 12 sites remaining in Victoria and the species listed as vulnerable. Since all occurrences, except

one site in the Otways, are in the Central Highlands, the need for conservation protection of the Upper Bunyip is high. In the light of the impacts from increased fire intensity and frequency and the effects of climate change, this VEAC Investigation is an opportunity to use the precautionary principle to give greater protection to the habitat of the Tall Astelia and other species in a conservation reserve in the Upper Bunyip.

The Upper Bunyip also includes some of the best Cool Temperate Rainforest and Wet Sclerophyll Forest gullies in the Westernport Region, including common occurrences of *Atherosperma moschatum, Nothofagus cunninghamii and Fieldia australis*.[vii] This Discussion Paper notes that Cool Temperate Rainforest is listed for protection under the Flora and Fauna Guarantee Act 1988.

A Nature Conservation Reserve is likely to contain areas where, in the long term, species such as the Tall Astelia and others may extend their range.

Previous government reports[viii] [ix] have identified the Upper Bunyip as a site of national zoological significance, and draw particular attention to the Blue Range – Mount Beenak area. The large numbers of threatened species residing in the area and requiring undisturbed forest is a powerful argument for protection of the Upper Bunyip.

The area was recommended for further investigation which implicates it as important habitat for several threatened species including Leadbeater's Possum, the Sooty Owl, Powerful Owl, the Bent-winged Bat and Tiger Quoll.

Particular attention has been given to the importance of the area as habitat for Victoria's faunal emblem, Leadbeater's Possum. This species is facing increased isolation across its range in the Central Highlands following decades of logging and more recent major fires. Andrews et al. state that "Logging of the Bunyip valley would certainly threaten the survival of Leadbeater's Possum in the Westernport catchment."[x]

Andrews et al. also state that "All the catchment of the upper reaches of the Bunyip River should be included in the Bunyip State Park, and logging totally excluded, as this area contains the only stands of mature Mountain Ash and Antarctic Beech in the catchment and is potentially very valuable habitat for the rare Leadbeater's Possum (refer 6.2.1 (i), p. 91) and probably provides breeding sites for the Sooty Owl (refer 6.2.2 (v), p. 123) and Powerful Owl (refer 7.2 (N1), p. 160)."[xi]

In the light of these strong past recommendations, we urge VEAC to propose the Upper Bunyip State Forest as National Conservation Reserve.

The Discussion Paper states, "The 2009 fires encompassed … roughly three-quarters of the Upper Bunyip block. It is likely that the availability of timber in [this area] will need to be reviewed based on post-fire recovery." Given the doubts about the viability of this area for timber harvesting, we recommend that it be protected as Nature Conservation Reserve.

The Upper Bunyip State Forest is clearly identified as having local, regional and national biodiversity and zoological significance, and supports a range of threatened species including Leadbeater's Possum. It is also a proclaimed water catchment and a regional site of rainforest significance, and contains areas of forest unburned by either of the 1939 or 2009 fires. Many recommendations for further study into the status and needs of various flora and fauna in the

area made by Andrews et al. 26 years ago have not been acted on. Consequently, it is currently impossible to adequately assess the effects that activities such as logging, recreation, fire and other factors have had on the area.

**Recommendations**

- **We recommend that VEAC list the Upper Bunyip State Forest as a Nature Conservation Reserve in recognition of its unique features and in respect for the precautionary principle.**

### c) Mount Disappointment Yarra Forest

This section of the submission refers to Mount Disappointment Yarra Forest, adjacent to the western edge of the Kinglake National Park**.** We recommend that 1,600 ha of Mt Disappointment Yarra State Forest area, adjacent to the western edge of the Kinglake National Park, be added to the National Park and managed for the conservation of nature.

This recommendation is made in recognition of the following features of the area:

- Contains numerous creeks and gullies (see interactive maps on DSE web). A comparatively large number of riparian zones and creeks in the area are increasingly important to biodiversity in a time of climate change. In particular, in what is mainly a region of dry forest, local refuge areas along riparian creek zones, in deep gorges and within and around waterfalls point to a need for change of management, preferably as an addition the adjacent Kinglake National Park.
- Contains headwater streams e.g. of Plenty River. The headwaters and upper reaches deserve the fullest protection for both water production and biodiversity.
- Patches of Cool-temperate Rainforest, listed for protection under the Flora and Fauna Guarantee Act 1988, could still occur in gullies as well as in the adjacent Kinglake National Park – although recent research indicates that, although there is some slow re-sprouting of myrtle beech in the Kinglake area since the 2009 fire, the co-dominant sassafras is not regrowing and possible extinction is a concern.[xii]
- The region needs a long period of undisturbed healing after the 2009 fire.
- In the vicinity are found the Barking Owl (*Ninox connivens*), Brush-tailed Phascogale (*Phascogale tapoatafa*), Powerful Owl (*Ninox strenua*) and Spotted Quail-thrush (*Cinclosoma punctatum*).
- The area of moist forest just north of and adjacent to the park is heavily logged and scheduled for more logging (See DSE interactive maps). This means there is more pressure to protect in park the habitat of the Yarra State Forest that lies within the VEAC Investigation Area.
- Considering the low level of protected lands in the VEAC Investigation area – 5.3%, well below the state average - the Mt Disappointment block would be a worthwhile addition to the adjacent park. It is to be hoped that a review of post fire timber availability, cited VEAC 2010 p86, for both the Upper Bunyip and Mt Disappointment Blocks, will lead to a decision in favour of conservation protection in reserves for both these areas.

**Recommendation**

- **We recommend that VEAC recommend the addition of 1,600 ha of Mt Disappointment Yarra State Forest area, adjacent to the western edge of the Kinglake National Park, to the National Park, to be managed for the conservation of nature.**

**d) Supporting existing recommendations**

We support the Draft VEAC-recommended additions of Crown land to the protected area system, and for management of identified Melbourne Water land to protect and enhance biodiversity values (pp.146-159).

The recommendations we endorse include:

- A1 Additions to Kinglake National Park (please note our additional recommendation of Mt Disappointment Yarra State Forest area).
- Additions to Bunyip State Park (please note our additional recommendation referring to Upper Bunyip State Forest).
- A3 Point Cooke Coastal Park
- E1 Bandicoot Corner Bushland Area
- Ryans Swamp and surrounds
- Truganina Swamp
- Edithvale-Seaford Wetlands
- E2 Edithvale Wetland
- E3 Seaford Wetland

**CONCLUSION**

The increased protection of Crown and public land in metropolitan Melbourne will be critical to ensuring a sustainable future. The growing urban footprint is placing unpredecented pressure on natural areas, reducing the ability of both flora and fauna to adapt to the impacts of climate change and eroding the livabilty of the region.

Infrastruture expansion, such as major new road projects and new housing developments, is further fragmenting the remaining remnant vegetation and open spaces. Funding allocations need to be redirected towards sustainable land use planning and design, including public and sustainable transport alternatives.

This joint submission is from the Victorian National Parks Association, Environment Victoria and The Wilderness Society. We would like to thank VEAC for the opportunity to help shape the future use of Crown and public land in metropolitan Melbourne.

## REFERENCES


[i] Transforming Australian Cities for a more financially viable and sustainable future, City of Melbourne and Victorian Department of Transport, July 2009.

[ii] Assessing the Costs of Alternative Development Paths in Australian Cities, Trubka, Newman, and Bilsborough, Curtin University and Parsons Brinckerhoff, 2008.

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