

3.3.0 Sunbury Growth Area

3.3.1 Introduction

The Sunbury Growth Area contains important biodiversity areas and habitat corridor connections within the areas proposed for development. All areas of EPBC-listed ecosystems and endangered ecosystems as defined by DSE within the new UGB must not be cleared. Areas that are listed to be cleared are not unavoidable as suggested on p.122 of the Strategic Impact Assessment. Ground-truthing suggests that the only reason for their destruction is to make things slightly more convenient and more cost-effective for developers.

In many cases it seems that these areas of significant ecosystems are not listed as “significantly constrained land” because they are in a prime position (i.e. they would make more money for developers). Under the EPBC Act “Threatening Processes” are listed, i.e. processes seen as major factors in causing the further decline of endangered and critically endangered species and ecosystems. “Land Clearing” is listed as one of these threatening processes. The areas listed in this submission cannot be cleared. To do so would mean that this Commonwealth Law is effectively worthless.

These endangered and critically endangered ecosystems have developed over many thousands of years and they are almost gone. Once these last remnants have gone, they will be gone forever. Since the SMEC report is at best significantly lacking (as detailed below – e.g. many significant errors and incorrect modelling) and the ecosystems that are proposed to be cleared are so significant, it is recommended that the Sunbury areas be fully re-assessed and/or that more time is given for a full and proper assessment of the UGB proposal. While this is inconvenient, not to do so would be reckless and irresponsible.

Sunbury has been identified as a ‘satellite town’ and the surrounding areas still have many natural values, including significant grasslands, grassy wetlands, grassy woodlands and creeks. Many local groups and local government have worked hard to delineate habitat links and areas containing important natural values to be preserved. More intensive development, without preserving areas for habitat and habitat linking, is not acceptable. If intensive development is allowed without preserving and managing for natural values, we will lose important local areas of habitat and links that are irreplaceable. Preserving the areas recommended in this submission will have virtually no impact on the overall goal of the proposed UGB expansion. Also, many landholders with no significant vegetation remaining and bordering on, but outside, the new UGB, would be happy to have their land included in the UGB.

The adoption of the recommendations in this submission will go some way to alleviating the disastrous ecological consequences of the proposed new UGB. The State Government must ensure the protection of the areas of high biodiversity value mentioned in this submission and recognise their importance for connectivity. These areas should be clearly indicated within the Final Report to the Federal Government.

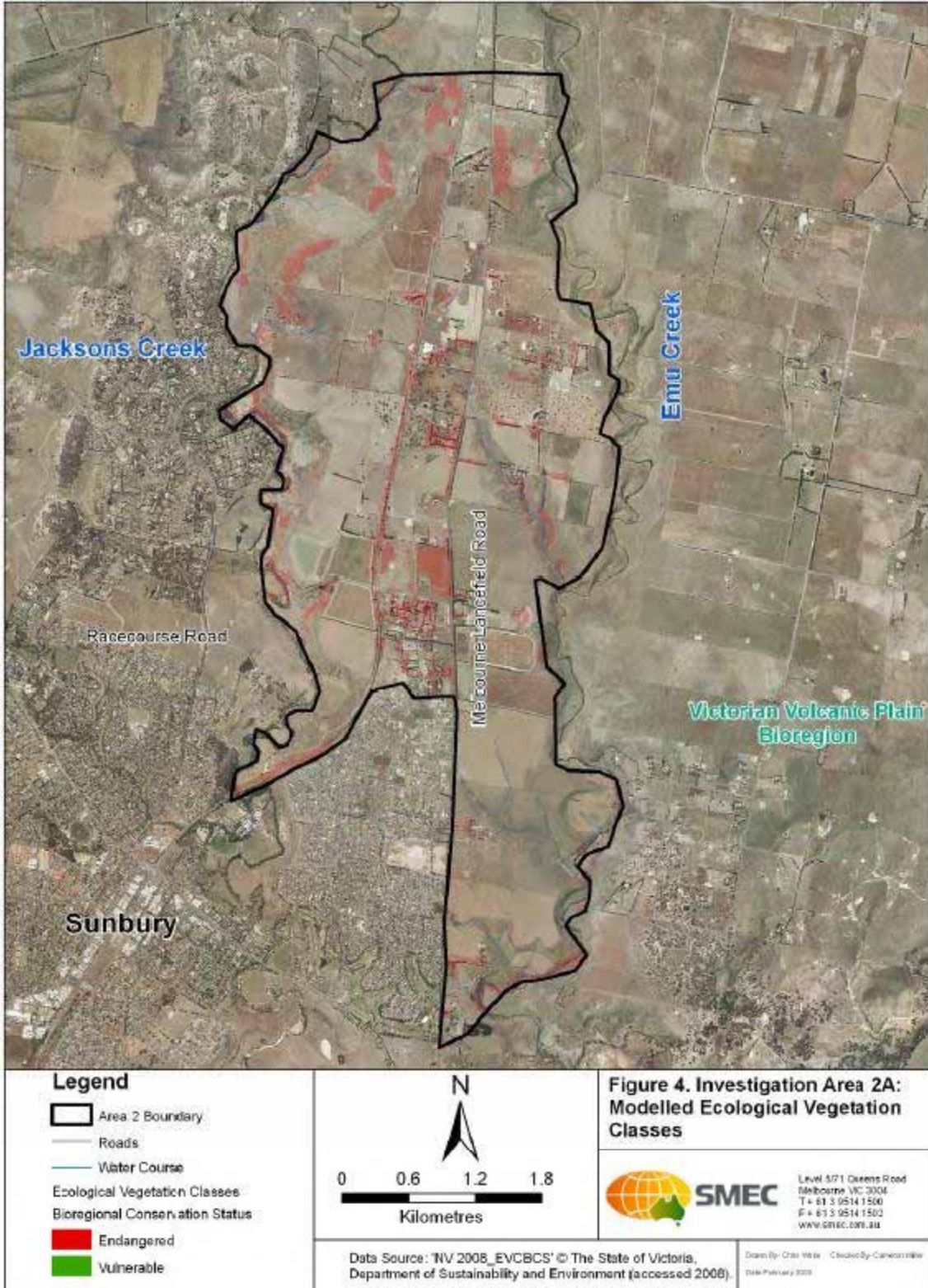
3.3.2 Issues

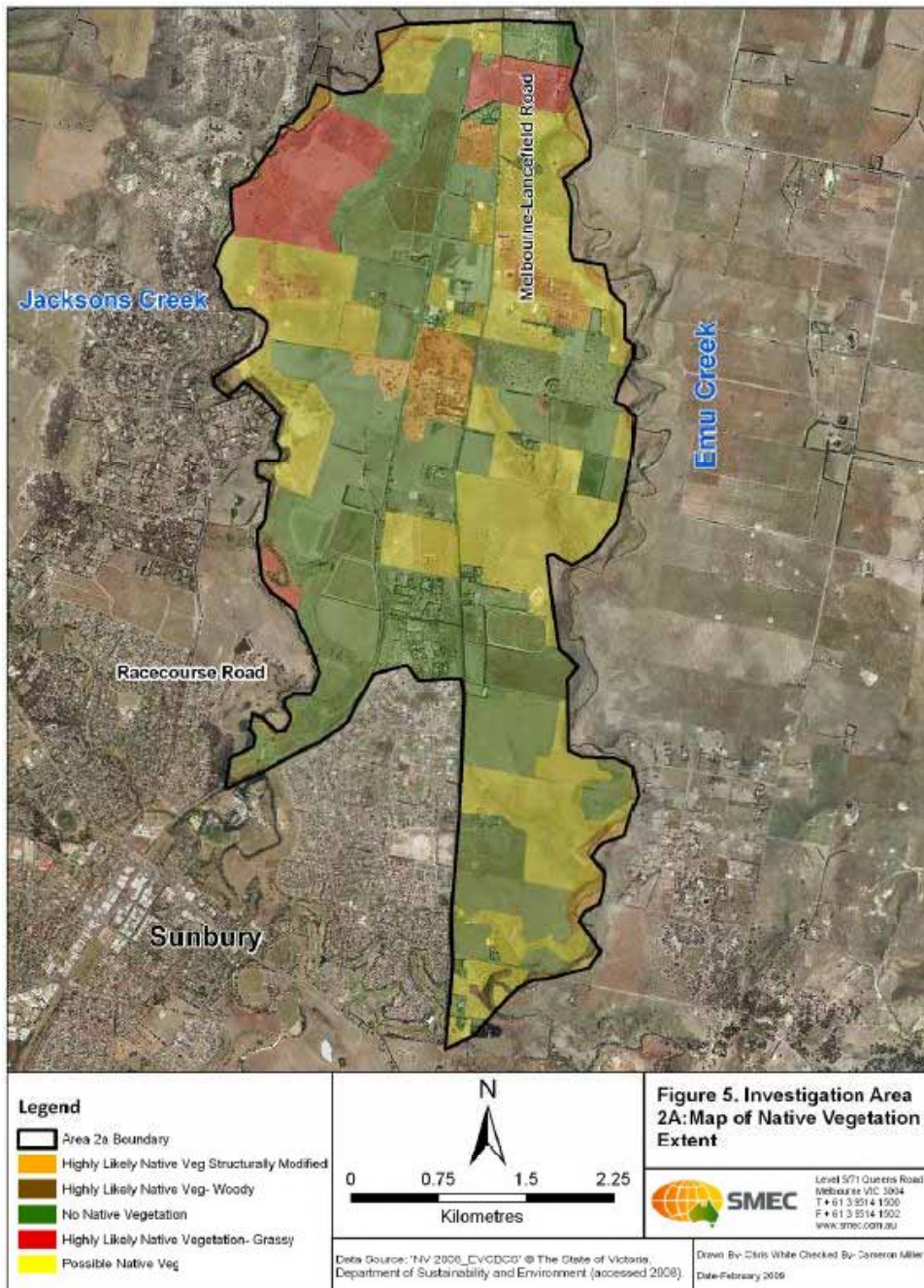
There are significant factual errors in the mapping and these give rise to the specific recommendations in this submission (section 3).

a) Mapping errors

Two maps have been relied on to determine the remnant vegetation values of the revised urban growth boundaries. These are reproduced below.

Figure 5.0 SMEC Base Maps of Sunbury





The consultants who undertook the work state that the information base is inadequate. Indeed, the maps are a major weakness of the report as they contradict each other, omit key information and contain major discrepancies.

Figure 4 is an example where data sourced from DSE has been altered when translated to SMEC's figure 5, resulting in a very different picture of the native vegetation. Many areas of what DSE designated "Endangered" EVC in figure 4 are shown as "No Native Vegetation" in figure 5. This includes not only the Raes Road Conservation Area but also the many roped-off DSE Biosites in the vicinity of Raes Road and southwards along the railway line.

There are many other examples of this unacceptable and seemingly nominal categorisation by SMEC. The Table below demonstrates how the original DSE data shows existing native vegetation in two main conditions. The SMEC data gives no sense that native vegetation exists at all, and the table below suggests that no ground-truthing has been done. This false interpretation of DSE data, the inadequacy of the original DSE data at times and the unjustifiable categorisation by SMEC mean that three levels of errors occur, making the final product in the report almost meaningless.

Table 5.0 Discrepancies between DSE and SMEC data.

DSE Data	SMEC data
Endangered	Highly likely native veg. structurally modified
Vulnerable	Highly likely native veg. - woody
	No native vegetation
	Highly likely native vegetation – grassy
	Possible native vegetation

Inadequate ecological information base The information base on which decisions are being made is acknowledged as inadequate by the report’s consultants, SMEC. SMEC state that extensive ground-truthing for native vegetation and targeted flora and fauna surveys are needed over much of the area covered.

Some of SMEC’s early maps and flora/fauna data seem to be an accurate reflection of the information available. The problem is that the information available is inadequate and in some cases plain wrong. Some ground-truthing of the DSE EVC data conducted by our groups show that many areas have been mapped wrongly, making the data and report at best unreliable, at worst wrong.

b) Omissions

Many grassland areas have been missed and/or misinterpreted. For example, possibly the best area of Themeda-dominated Grassland in the Sunbury Investigation Area is completely missed in SMEC’s survey. This mistake is of significance because this area of Grassland is fenced off (with significant fencing infrastructure) and designated a “Conservation Area” by Hume City Council with obvious signage (see photo below).

During a visit on 28 June 2009, members of our group walked only along one side of the grassland area (not inside) and photographed Themeda, Dianella, Hedge Wattle, Black Wattle, daisies, Spear Grass, Asperula (woodruff), Lomandra, Atriplex and Einadia species (all things expected to be seen at this time of year in a native grassland in the Sunbury area). This area is almost completely weed free.



Figure 6.0 Themeda-dominated grassland missed in UGB report. (Photo taken 28 June 2009)

The only area of Plains Grassy Wetland in the investigation area is also curiously omitted from the report. Areas adjoining these wetlands that slope down to the wetlands are designated as 'Proposed Non-urban Area (Development Avoided)' because of their 'Biodiversity'. These areas slope down to the wetlands, which are not themselves designated 'Biodiversity', and they are in the development area.

Figure 7.0 Map of Plains Grassy Wetlands in Sunbury



Plains Grassy Wetlands are now extremely rare and all efforts should be made to rehabilitate these area in a way that has been achieved elsewhere in Victoria (see diagram below). The wetlands above are still in reasonable condition and used by wetland birds. In a ten-minute visit to the site, we saw and photographed a number of wetland bird species, including ducks and cormorants, indicating that this area is still an important wetland for local wildlife.

Consequences of mapping errors

The mapping errors mean that many important remnant vegetation areas have been omitted. It is clear that probably up to 20% of the grassland areas, ranging from low to high quality areas (as defined by Biosis in their report for the proposed new reserves), have been missed by the SMEC report – including areas missed that are Council Conservation Areas and DSE Biosites of equal or probably higher remnant vegetation quality than any of the areas to be purchased for the proposed new reserves.

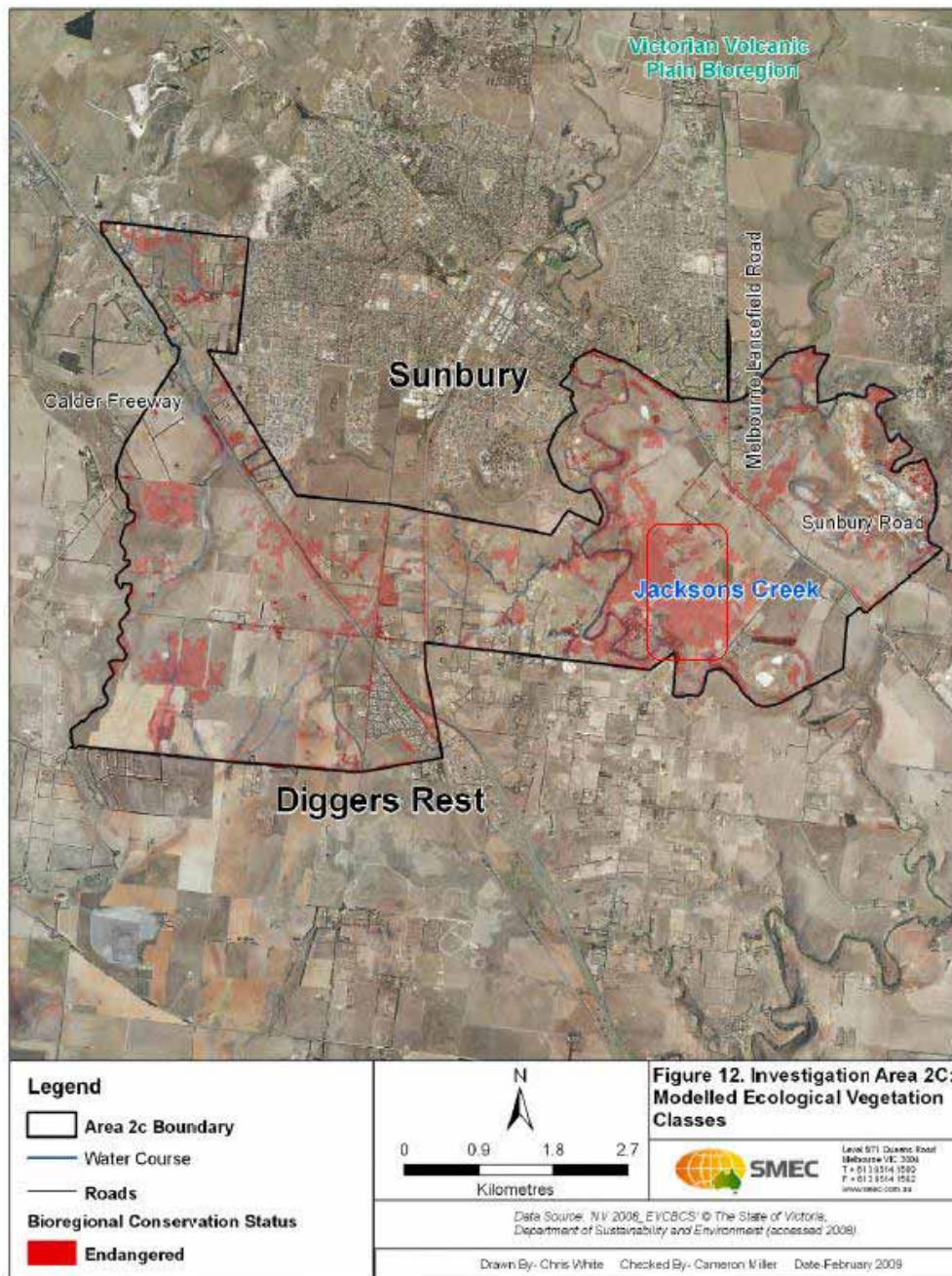
The consequences of the abovementioned mistakes and the inadequacy of the UGB report are many. 1) significant areas of endangered and critically endangered ecosystems have been completely missed by the consultants as presented in the UGB report; 2) these areas are designated to be cleared within the Sunbury Investigation Area with no 'offset'; 3) it is at best disturbing that SMEC has not consulted adequately with the relevant local government and other organisations in compiling the work that the UGB Report relies upon.

Figure 5 highlights the poor quality of the underlying analysis and data (the three categories are areas of 1. Highly Likely Native Veg., 2. Possibly Native Veg., 3. No Native Vegetation - there are

no categories of Known Native Vegetation, which shows their report is almost meaningless. What is worse, their baseless categories contradict DSE data – e.g. areas of green on figure 5 in the report (No Native Veg.) coincide with areas highlighted on figure 4 (both figure 5 above) that are designated as Endangered EVCs.

On SMEC’s Figure 5 all of the following are designated “No Native Vegetation”: a) many areas in the Sunbury Investigation Areas roped off as Biosites by DSE, b) areas designated as Conservation Areas by Hume City Council, c) significant remnant vegetation areas adjoining the Jacksons Creek escarpments (especially areas along Shepherds Lane and near Redstone Hill (pictures of that vegetation are below), d) all the very significant areas of very high quality remnant Themeda-dominated grassland along the many kilometres of rail reserves; e) many other areas completely missed by all maps (eg. Raes Road Conservation Reserve and west of Lancefield Road opposite the Fire Trail, as depicted on inset of recommendations map).

Figure 8.0 Endangered EVCs in Sunbury Area



The map above shows an encircled area designated an endangered EVC by DSE. Below are pictures of that area. Below that again are SMEC’s categories suggesting, wrongly, that these

areas that adjoin Holden Reserve have 'No Native Vegetation'. This area is almost weed-free native vegetation (wallaby grass and spear grass dominated).

Figure 9. Picture of grassland adjacent to Holden Flora and Fauna Reserve



Above and below: Land on top of the Jacksons Creek escarpment, east of Holden Reserve, on Shepherds Lane (this is designated 'No Native Vegetation' by the SMEC Report, yet it is designated as an Endangered EVC by DSE and, as can be seen, it is indeed excellent, weed-free, native vegetation).

It should be noted that the addition of this area to the Holden Flora and Fauna Reserve may increase the value of this reserve. There should also be some specific investigation for implications for the Grassland Earless Dragon. The NRP [National Recovery Plan] for Grassland Earless Dragon (2000-2004) notes that the Holden Flora and Fauna Reserve was one of the sites where there were sightings of Earless Dragons between 1988 and 1990.

Figure 10 Picture Shepherds Lane/Redstone Hill area



Above – Remnant *Atriplex semibaccata* (and other Chenopods) still dominate the Shepherds Lane/Redstone Hill area – in this case alongside a area dominated by Wallaby Grass. This is extraordinary considering that large parts of the similar areas west of Holden Reserve have been overtaken by Carpetweed. No Carpetweed was seen at the above site (Shepherds Lane - date: 28 June 2009).

3.3.3 Specific Sites in Sunbury Growth Area which require protection

**Figure 11 – Site 13
Palmers Lane links
and grasslands.**



Figure -12 Priority areas for protection and habitat links.

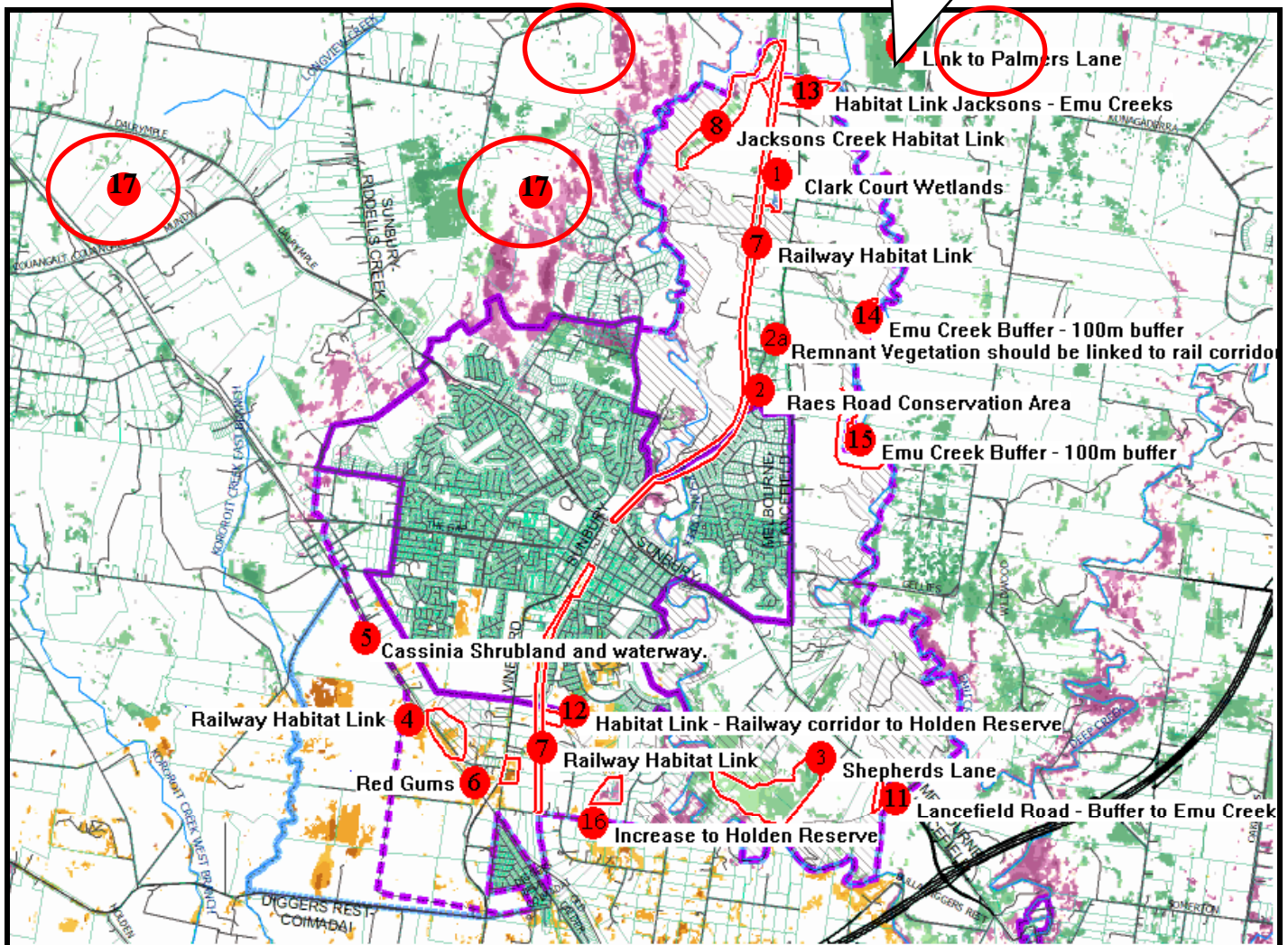



Table 6.0 Priority Areas for Protection in Sunbury

	Locations (see numbered items Refer to Figure above)	Comments
Sites that must be protected	1. Clark Court Wetlands (pictured above)	Plains Grassy Wetland – nominated for EPBC listing. Connected to Themeda grassland along the rail reserve.
	2. Raes Road Conservation Area (pictured above)	Very high quality Themeda grassland. Council managed, should not be available for development. Why is this not excluded? Missed by SMEC.
	2a. Remnant vegetation linked to rail corridor and Raes Road Conservation Area	Good quality remnant grassland exists in the housing estate south of Raes Road, on Raes Road roadside, south of Raes Road on Lancefield Road and north of Raes Road. All these areas should be connected and joined with the rail corridor (which in this area contains a number of DSE biosites).
	3. Shepherds Lane (pictured above)	This is a big block (128 ha) in very good condition and almost weed free. It connects with Holden Flora and Fauna Reserve across Jackson Ck.
	16. Increase to Holden Reserve	This area of endangered remnant vegetation sits alongside Holden Reserve and must not be cleared.
Sites among those that require urgent further assessment	4. Moores Road	This EPBC-listed grassland area requires further assessment.
	5. Cassinia Shrubland & Waterway	An unusual area that is recommended for rehabilitation (perhaps by Melbourne Water given the waterway located there).
	6. Red Gums	This area needs further assessment. The area includes a block of land containing significant Red Gums. The main area designated Grassland in this section now seems to be a winery.
Habitat links	7. Railway line easement	Biosites exist along this easement. Its entire length should be protected and a buffer of 50m either side included along its length as a wildlife corridor, irrespective of ground layer condition.
	8. Jacksons Creek Habitat link	Although included adjacent to a ‘constrained area’, these areas of native vegetation are not included in the constrained area and must be included. It is an important part of the Jacksons Creek habitat link.
	9. Palmers Lane grassland.	This is a patch of very high quality grassland that is important to the Sunbury area. It is, as a minimum, important to ensure that habitat links are retained to this area. At best it should be included as an offset and Reserved.
	12. Habitat Link – Railway line to Holden Reserve	Link between ‘constrained area’ adjoining the western border of Holden Reserve and the Railway line easement. The missing link here is very short and would result in a major habitat link.

	<p>13. Jacksons Creek- Emu Creek.</p> 	<p>Link Jacksons Creek with Emu Creek. This is a complicated area (see inset map) with important remnants and habitat links. The 'Fire Trail' and adjoining areas are part of a Bushcare project (Natural Heritage Trust) and the habitat link to the large area of intact, high quality grassland on Palmers Lane is critically important. Creek Buffers are required. Emu Creek and Jacksons Creek both provide important links through the landscape. There needs to be an unambiguous minimum 50m conservation reserve from the top of each side of the creek escarpment along their entire length, irrespective of the current biodiversity values within this buffer.</p>
	14 & 15 (& 11). Emu Creek	Requires buffers of 50m from the top of the escarpment (50m each side). Area 11 also seems to require a buffer to Emu Creek but could not be accessed.
	Melbourne – Lancefield Road	The entire length of this road within the proposed expanded UGB requires a 50m buffer.
Offsets or Land swaps	9 & 17	Some local offsets and land swaps are required for the considerable amount of EPBC-listed ecological communities in the Sunbury Investigation Area. These two areas are of significant ecological value to the Sunbury area.

3.3.4 General Issues for Sunbury Growth Area

- The whole of the Sunbury Investigation needs to be re-assessed, with a substantial element of ground-truthing. The SMEC report is wholly inadequate. Ground-truthing could be done cost effectively, and it would be reckless and irresponsible not to do so. SMEC themselves say their report is a "broad overview", "not suitable for site specific planning", the flora and fauna analysis "has significant limitations" especially for areas that are "extensively private land" (this is the vast majority of the area studied in the report - and our ground-truthing on private land proves this point), their assessment "does not have the precision to pick up remnant scattered trees which are likely to occur across the investigation area" (this is what grassland is, scattered trees - basically saying the assessment they have done cannot pick up key aspects of the life-giving aspects of the vegetation communities they are trying to assess).
- Anyone submitting an assessment of this report is significantly disadvantaged in having to conduct ground-truthing in June and July when grassland areas cannot be assessed properly (e.g. many important plant species such as orchids, lilies and herbs that dominate the floral grassland display in late spring are underground and not assessable in June and July). More time is required is to assess the report properly, at least until the end of January 2010.
- A 100m buffer either side of all railway lines, creeks and other important linking elements of the landscapes (e.g. major power line easements) is essential to the preservation of the natural heritage values of Sunbury. Such buffer zones are realised today as imperative for the continued survival of ecosystems around the world.
- All 'Priority Areas Targeted for Supplementary Assessments' (items 1-4) in the report need to be assessed as per the SMEC recommendation, preferably not by SMEC but by Practical Ecology or Biosis.
- SMEC's habitat links have gaps that need to be filled. In addition, all important remnant vegetation patches adjoining these habitat links must be included within the habitat links and not cleared or developed.

- The principles applied in this assessment apply equally to the other investigation areas in the report: that is, buffering major easements as important habitat links, reserving and not clearing all the most important remnant vegetation sites in the entire new proposed UGB, better ground-truthing in all areas. There are many very important remnant areas in all areas that in some cases contain many EPBC-listed species and ecological communities. No endangered or critically endangered species and communities must be lost in this process.