

VNPA response to:

Preliminary documentation for the proposed residential subdivision and development of 62 Collins Road and 170 Boundary Road Dromana, EPBC 2025_10100



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1. Executive summary

1.1. Who we are

The Victorian National Parks Association (VNPA) is one of Victoria's leading nature conservation organisations. It is an independent, non-profit, membership-based group, which for 70 years has existed to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

1.2. Key points

- This project has been determined a controlled action and is being assessed under the Preliminary Documentation pathway.
- Disappointingly, the preliminary documentation package has not changed in any substantive detail from the version submitted earlier in 2025 as part of the original EPBC Referral.
- Swamp Skink is known to be present, the site represents a rare urban example of the distribution of this species.
- A full understanding of the extent of the species on the site, and in the broader context, is not known. It is quite possible that clearing the Swamp Skink habitat will have significant impact on the species as a whole. Mornington peninsula is a known hot spot for the Swamp Skink. As the 2023 Flora and Fauna Assessment notes (p. 32):

It is currently unclear whether the study area has the potential to support an extensive population of Swamp Skink and subsequently, whether the proposed action will constitute a significant impact to the species.

- Much more of the site should be reserved for the protection of Swamp Skink. The project has 22.98 ha Swamp Skink habitat but the proposal is only retaining 5.78 ha of that. The population present in that portion will come under increasing and unavoidable pressure from the indirect impacts of the adjacent development. The amount of habitat should be expanded as a thickening of the tree reserve currently proposed (see Conservation Management Plan p. 10) to include a substantial buffer area to balance those impacts.
 - We note that there are no guarantees the current proposed tree reserve/verge will be retained. We suggest this retention (and expansion) becomes a permit condition.
- As the Reserve is intended to be closed to the public, very little public open space is being provided as part of the development. Substantially more should be provided in the form of uncleared land, which would be well-placed as a further buffer to the conservation reserve.

- We believe the proponent has not adequately addressed the significance of the Mornington Peninsula as a hotspot for the Swamp Skink, for instance by including Figure 1 below or its equivalent.

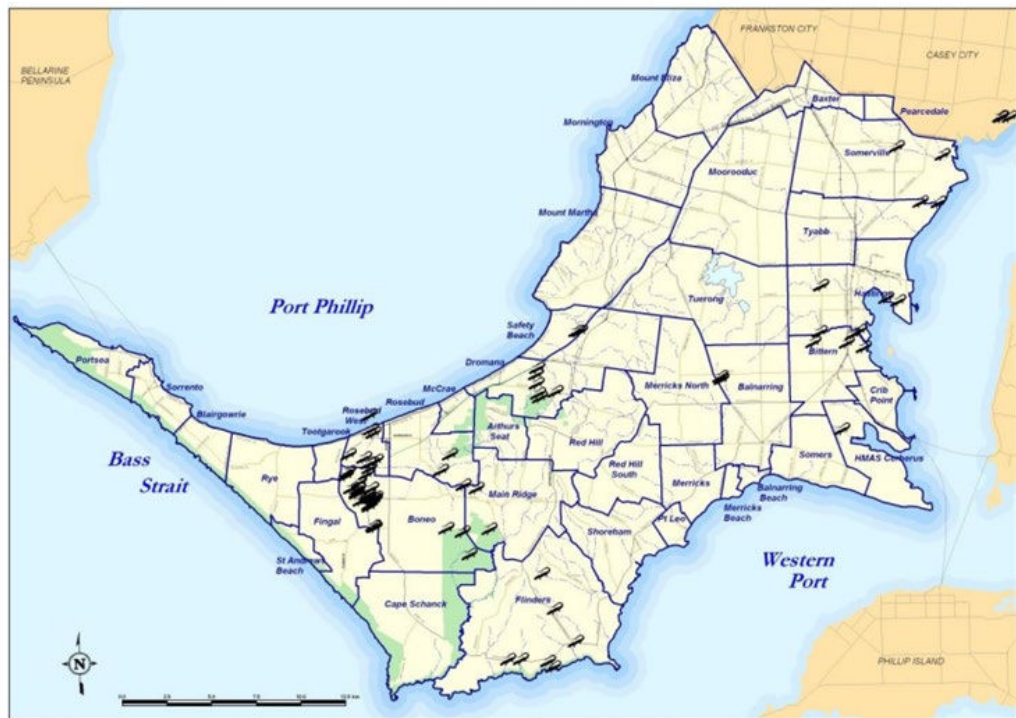


Figure 1: Map showing the areas around the proposed development site is a hot spot for Swamp Skink from Guidelines for management activities in Swamp Skink habitat on the Mornington Peninsula by Peter Robertson and Nick Clemann (2015).

- The site is located adjacent to Arthurs Seat State Park, giving it important connectivity. However, the project will significantly reduce that connectivity, removing vegetation along approximately half of the southern edge connection to Arthurs Seat.
- Consequently, the project should be redesigned to include a full vegetated edge along Boundary Road. The current vegetation on Council land along boundary Road is not secure, in that it would be significantly impacted from any likely future road duplication.
- Other permit conditions that could be considered include:
 - A much greater number of trees being retained.
 - A substantial uncleared buffer around the Melbourne Water easement.
 - Reconsideration of the location of the Boundary Road entrance, moving it to a location that has less biodiversity impacts.
 - Setting aside funds to contribute to a fauna road underpass to better improve connectivity to the south of the site.
 - We note that there are no guarantees the current proposed tree reserve/verge will be retained (see Conservation Management Plan p. 10). We suggest this retention (and its further expansion) becomes a permit condition.