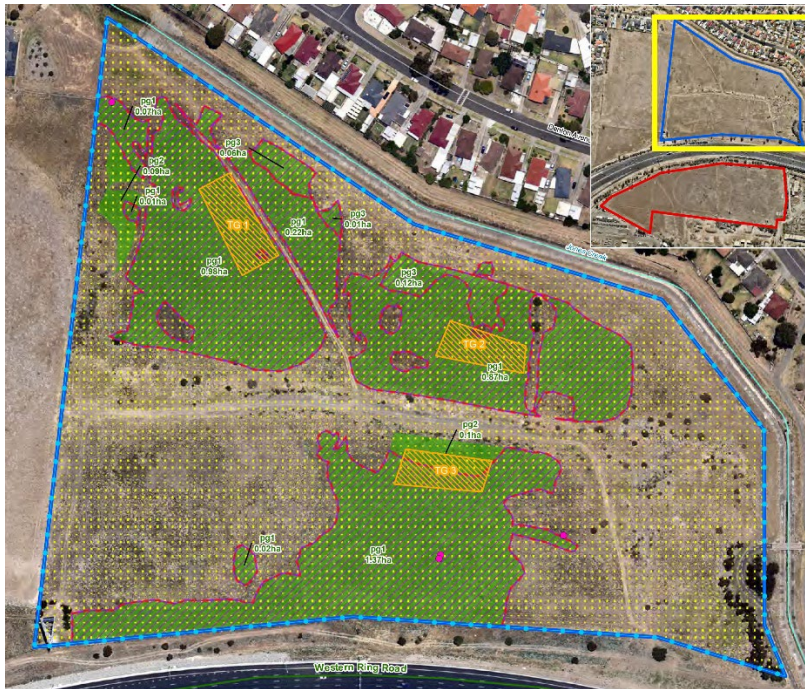


Grassy Plains Network and VNPA response to:
Preliminary Documentation for the Proposed
Development at 103 Reid Street and 18b Jonesfield
Corner, Ardeer, Victoria (EPBC 2014/7358)



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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.

The Grassy Plains Network represents land management professionals, academics, ecologists and community members concerned about the ongoing decline of grassy ecosystems across Melbourne and its surrounds. We advocate for improved grassland protection and management. We are part of the VNPA.

1.2. Key points

- The clearing of critically endangered grassland should not be allowed.
- The proponent's documentation is premature, incomplete, and wastes government and stakeholders' time.
- The proposal relies on a road connection that is yet to be determined.
- The proposal requires rezoning, which is far from certain.
- The proposal fails to meet basic City of Brimbank planning criteria.
- The proposal does not provide basic information around methodologies used in the Funa and flora Assessment.
- Any development should retain grassland and biodiversity corridor along Jones Creek.
- The proposed land use at 103 Reid Street is difficult to understand and requires clarification. For instance, 1.4 ha seems to have been omitted from offsetting calculations. No discussion is presented around existing on-title agreements. Currently the proposal is open to misunderstanding.
- The site is an important overwintering and foraging location for a known nearby population of endangered growling grass frogs. This has not been taken into consideration.
- Victorian Grassland Earless Dragon not appropriately considered.
- Any permit ultimately provided should require:
 - All planting to support local grassland and riparian systems
 - Quality interpretive signage for all protected grassland
 - Improvement to the grassland condition in the interface area between the Reid Street fence and the shared path
 - Restoration of the scar cut through Reid Street Grassland

- An active restoration program, with appropriate monitoring, and mechanisms to ensure the quality of the protected grasslands improves as measured by multiple KPIs, including floristic diversity, insect biomass, and weed cover
- Any grassland not part of an offset should also have funding guaranteed for its proper management
- The proponent should provide a community engagement plan to promote grassland values
- The consultation process should continue to include stakeholders such as those who have responded to this preliminary documentation.
 - Our understanding is that the proponent is required to summarise stakeholder responses (usually through a table) and provide their own comments regarding those responses, and to then provide the summary table to DEECCW.
 - We request to receive a copy of that summary table (or its equivalent) to ensure that our submission has been correctly summarised and understood. In our experience this provision of the summary table to stakeholders such as ourselves does not automatically occur, hence we are including this request here and in our correspondence to Ecology and Heritage Partners, as well as directly to DCCEEW.

2. Discussion

2.1. Critically Endangered grassland too rare to clear and offset

The natural Temperate Grassland of the Victorian Volcanic Plain are as close to extinction as an ecosystem can get. Latest data from the Arthur Rylah Institute shows only 0.58% of the former extent still exists. Victoria's 2023 State of the Environment Report emphasises that grasslands are continuing to decline. Many of the plants and animals associated with this ecosystem are also rare or threatened.

The cumulative impacts of further grassland loss are too great, and we cannot afford to lose any more of this ecosystem. Offsetting the grassland results in net loss, not net gain.

The grassland at 103 Reid Street and 18B Jonesfield Corner are part of a connected system supporting local biodiversity, including Striped Legless Lizard and Growling Grass Frog, several EPBC-listed plant species such as Spiny Rice-flower, as well as FFG-listed species such as Tussock Skink. Other grasslands exist directly opposite along Jones Creek. Further grasslands are present nearby (Figure 1). These all support each other.

To clear the Jonesfield Corner Grassland is to have direct impacts on all these adjacent patches of biodiversity. It will reduce options for landscape-wide conservation. Overall, the long-term viability of the other remnants in Cairnlea and nearby will decline. Isolated native grasslands have less buffering capacity and resilience to environmental change relative to more connected native grasslands.

In Melbourne's West, where so little native grassland remains, further loss of remnant grassland compromises what remains. The stepping stones across the landscape, for creatures such as pollinators, become too far apart to work. This isolates populations,

leads to reduced gene flow, and compromises the long-term viability of these species, meaning that local extinction will occur. At Section G, there is an opportunity to buffer such impacts through good planning and the preserving of grassland.



Figure 1: Location of grasslands and significant nearby natural assets.

2.2. Road connection

The development masterplan is predicated on a road connection that currently does not, and may never, exist. The proposed road connection is dependent on the resolution of the still-to-be-determined Cairnlea Section G Mixed Use Development, EPBC 2020/8720.

No evidence is provided of any investigation into options for a road connection (Figure 2).



Figure 2: Alternative points of entry to 103 Reid Street.

2.3. Failure to meet even basic Brimbank planning requirements

The masterplan presented would not meet local planning requirements. It requires rezoning, provides no WSUD or public open space, and has inadequate setback from the Jones Creek top of bank.

No further consideration should be given to this proposal until the proponent provides a plan that seriously engages with its regulatory context, and aligns with the Victorian Planning Scheme and existing standards.

2.4. Inadequate Flora and Fauna documentation

The preliminary documentation provides inadequate detail around flora and fauna assessment methods. No independent analysis can be undertaken without this data.

2.5. Retention of grassland on Jones Creek and biodiversity corridor

At the very least, a 100 meter setback should be retained along Jones Creek, and a link east to the Denton Avenue landfill future restoration site and Denton Avenue Grassland ensured (Figure 3).

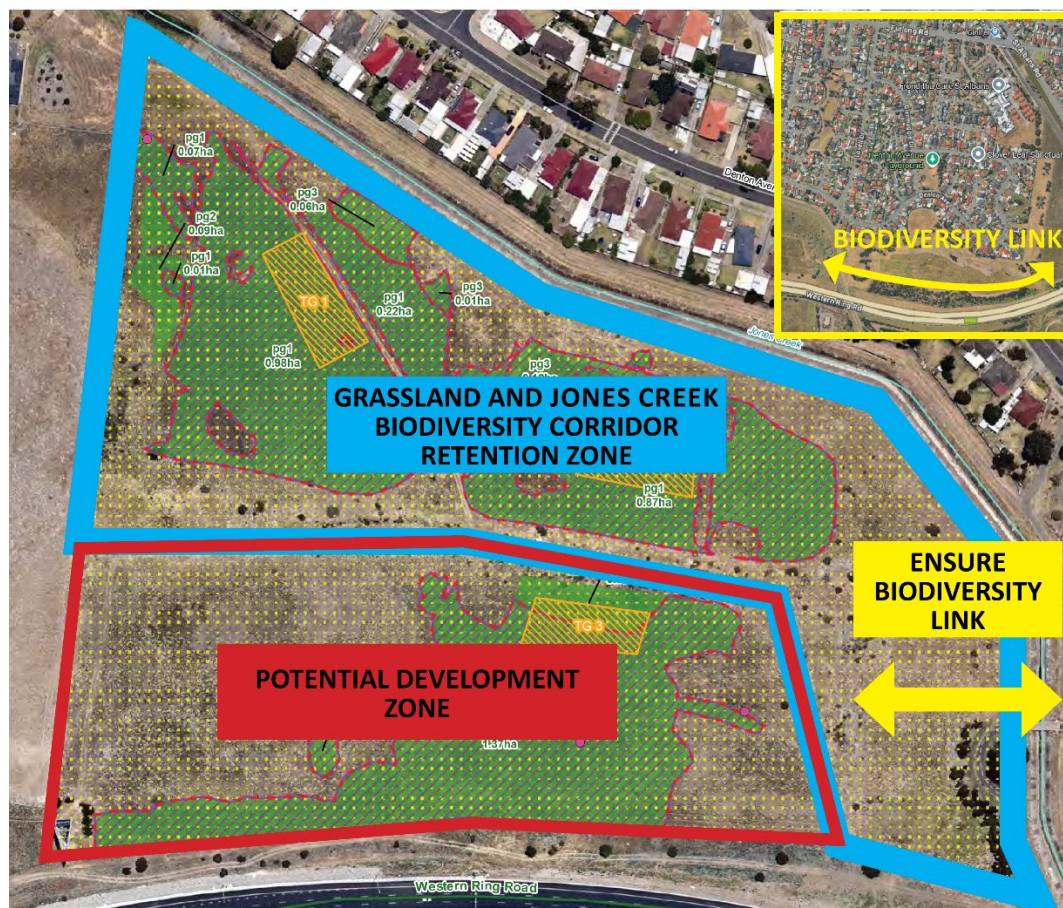


Figure 3: Any development must be restricted to area near Ring Road and to reserve grasslands and biodiversity link along Jones Creek.

2.6. Retaining grassland comes with social and well-being benefits: an opportunity for more thoughtful development

The grassland patches at Reid Street and Jonesfield Corner should be integrated into an urban design solution that protects remnant vegetation and provides substantial community benefit.

Doing so will benefit the larger landscape and contribute to the viability of important remnant vegetation nearby.

Retention gives local residents the opportunity to have unique, wild, nature at their doorstep, delivering substantial ecosystem services, including well-documented human health and wellbeing benefits.

Grasslands are the iconic ecosystem of Melbourne's West. Their retention strengthens local identity.

2.7. Salvage of Striped Legless Lizard for research purposes

The proposal should not allow the destruction of critically endangered Striped Legless Lizards. It is entirely possible to translocate these creatures, and salvage and translocation is permissible for research purposes. Policy restricting salvage and location was developed because insufficient research had been done to show that translocation and salvage could be successful. There has not been a substantial body of research since to interrogate this matter. Any development should also fund research to better understand the potential for translocation. That way, the loss of this population can at least have good research outcomes.

Crushing protected species under a bulldozer is inappropriate, and flies in the face of community concern.

2.8. Victorian Grassland Earless Dragon surveys inadequate

Careful consideration should be given to any assumptions about appropriate levels of cover, floristics, soil cracking and rock presence for Victorian Grassland Earless Dragon so as to not exclude areas that may well be suitable habitat. The project should not be allowed to proceed without the oversight of the Victorian Grassland Earless Dragon National Recovery Team.

2.9. Tussock Skink

Tussock Skink are present. These are listed as Vulnerable in Victoria. Efforts should be made to protect these species.

2.10. Growling Grass Frog

Kororoit Creek and its tributary Jones Creek has a known metapopulation of Growling Grass Frog. The project location should be considered an important overwintering and foraging location for this species.

Appropriate surveys need to be undertaken.