

Grassy Plains Network submission regarding
Project Diamond Industrial Development, EPBC 2026/10418



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1. Executive summary

1.1. Who we are

The Grassy Plains Network represents land management professionals, academics, ecologists and community members concerned about the ongoing decline of grassy ecosystems across Victoria. We advocate for improved grassland protection and management. We are part of the Victorian National Parks Association (VNPA).

The 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 messages

- A controlled action: The project clearly should be a controlled action since it impacts important Natural Temperate Grassland of the Victorian Volcanic Plain and Golden Sun Moths. It may also impact other MNES, but the quality of the survey data is insufficient to determine that
- Assessment process: We understand we do not have the authority to call for a strategic assessment ourselves. However, we would like to request that DEECCW canvases the possibility of such a pathway with all relevant parties prior to making any determination on this proposed action. (See 1.4 below)
 - If a strategic assessment cannot be undertaken, we believe an EIS would be the minimum requirement for the project, especially given the likely contamination present.
 - Given Victoria's Planning Department's setting aside an Environmental Significance Overlay that would have applied to this project (see 1.3 below), we don't believe it would be appropriate to assess the project under the bilateral agreement
- Ecological surveys are inadequate
 - Striped Legless Lizard surveys don't meet guidelines
 - Victorian Grassland Earless Dragon surveys don't meet guidelines
 - Flora surveys insufficient, conducted early October 2025 on closely mown land. Last year there was a very poor floral display in early October in Melbourne generally, due to unusual rainfall patterns in particular – a fact well known to the consultants, but overlooked in their reporting
 - Consultants state that "All commonly observed vascular flora were recorded", which suggests that unusual observations (e.g. observation of potentially rare species) were discarded. We doubt this is the case, but must raise the matter
- Golden Sun Moths are assumed to be absent, despite strong 2022 data showing their presence, and the consultants themselves acknowledging the inadequacy of survey by noting that survey conditions were suboptimal, and that weather constraints likely suppressed GSM emergence
- Far greater avoidance is possible

- Lack of avoidance is justified by the land being needed for cut and fill, and bulk earthworks, both of which are poor excuses, and for which no adequate documentation has been provided
- No mitigation proposed
- Proposal suggests preserved areas of Natural Temperate Grassland of the Victorian Volcanic Plain will be maintained in current condition (i.e. neglected), rather than subject to beneficial restoration works
- Inadequate documentation:
 - Inadequate survey
 - No logic for the proposed avoidance
 - No offset plan
 - No Environmental Management Plan
 - No contamination data despite history of petrochemical manufacture
 - No clear description of grassland context, e.g. that the site is surrounded by high-quality grasslands including Horsburgh Drive Grassland, Laverton Nature Conservation Reserve, Altona Nature Conservation Reserve, Burns Road Grassland, Ajax Road Grassland, Ajax Road North Grassland, Doreen's Wildflower Meadow, Maidstone Street Grassland and well as several unnamed offsite sites on the adjacent SCT land. In addition, project straddles Kayes Drain, which though poorly named is an important biodiversity corridor linking numerous high-quality grasslands
 - No assessment of hydrological conditions
- The consultant's report includes a thin line of land along the rail line to the immediate south of the project, though no mention of the role or future of that land is covered in the project staging
- Poor documentation and loss of Matters of National Environmental Significance notwithstanding, the project is a reasonable use of vacant industrial land.

1.3. Unacceptable impacts to Critically Endangered grassland

The Natural temperate Grassland of the Victorian Volcanic Plain is listed as Critically Endangered under the EPBC Act and are on the brink of extinction.

Latest data from Arthur Rylah Institute suggests only 0.5% of the extent of the Victorian Volcanic Plain's grasslands remain, with only 0.13% Themeda grassland remaining. We must stop erasing grassland. (See Farmilo, B., Batpurev, K., Sinclair, S., White, M. and Griffioen, P. (2021) Spatial model for native grasslands of the Victorian Volcanic Plains. Unpublished Client Report. Department of Environment, Land, Water and Planning, Heidelberg, Victoria.)

The Victorian government's most recent State of the Environment Report states that most of Victoria's ecosystems are stable, with two exceptions – grasslands and wetlands – which continue to decline. According to DEECA's time series data on land-cover, grassland decline has been ongoing since at least the 1980s.

The cumulative impacts of projects such as the proposed industrial development fuel this grassland decline. Many such projects claim to protect grassland while in fact reducing its extent. It is well-known that offsets do not produce net gain.

This is not an isolated fragment of grassland. The proposed development site is in close proximity to numerous other high-quality grasslands,

Offsets should always be a last resort. Native grassland should be retained in situ unless there is no reasonable alternative.

1.4. Planning background

For more than two years, the City of Hobsons Bay has been preparing an Environment Significance Overlay that would cover the numerous nationally significant grasslands across the Altona Industrial Precinct.

Council submitted their Planning Amendment package to the Victorian Planning Minister early last year, but the Minister delayed its approval for an unusually lengthy period.

On 17 February 2026 the Minister instead made her own planning amendment, which included no environmental protections.

On 19 February, this current proposal appeared on the EPBC Referrals portal.

The timing means the Victorian environmental protections are minimised for this development.

1.5. A strategic assessment would provide a better planning pathway

We believe a strategic assessment should be conducted for all vacant and unprotected land in the general Altona industrial region.

We have written to the Victorian Planning Minister, who is disinclined to request a strategic assessment at the moment.

We have also raised this possibility with Hobsons Bay City Council, who are currently considering the matter.

A strategic assessment would be an excellent process at this point because:

- It is timely
- The current proposal here is likely to be just the first of several across the region that will impact numerous MNES, which are present across the many grasslands of Hobsons Bay
- It would be able to determine which are the best areas of environmental significance to retain and consider the larger ecological connectivity of the area: e.g. the creeks, rivers, wetlands, estuaries, Ramsar sites, and Marine Coastal Parks downstream and nearby
- It would raise the standard of data provision. The lazy or deliberate inadequacies of the proponent's documentation of the current proposal are a case in point
- It would provide equity for all landowners. Note that Burns Road Grassland requires action at the highest levels to resolve issues around its 400+ land parcels and landholders
- It would provide for local offsets, a valuable mechanism to help secure these nationally significant grasslands
- It would provide long-term management and protection. Many of these grasslands are slowly declining because of neglect

- It is the only way to deal holistically with the many stakeholders, tenures and complexities of the region, which has really quite extraordinary natural assets, especially for an urban situation.
- There could be very good ecological outcomes from a strategic assessment that would otherwise not be able to be gained from a project-by-project series of referrals.

We understand we do not have the authority to call for a strategic assessment ourselves. However, we would like to request that DEECCW canvases the possibility of such a pathway with all concerned prior to making any determination on this proposed action.