

Grassy Plains Network and VNPA response to: City of Greater Geelong Draft Plan for Nature



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Image: Natural Damp Grassland of the Victorian Coastal Plains, Scenic Estate Conservation Reserve (Phillip Island).
Photo Graham Petersen

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. Summary

The draft is commendable but has notable omissions, most significantly around the critically endangered EPBC-listed ecological community Natural Damp Grassland of the Victorian Coastal Plains. There are records of a very significant patch of this most threatened community along the Barwon River, and it is crucially important to include in the Plan for Nature detailed discussion around this little-known grassland community.

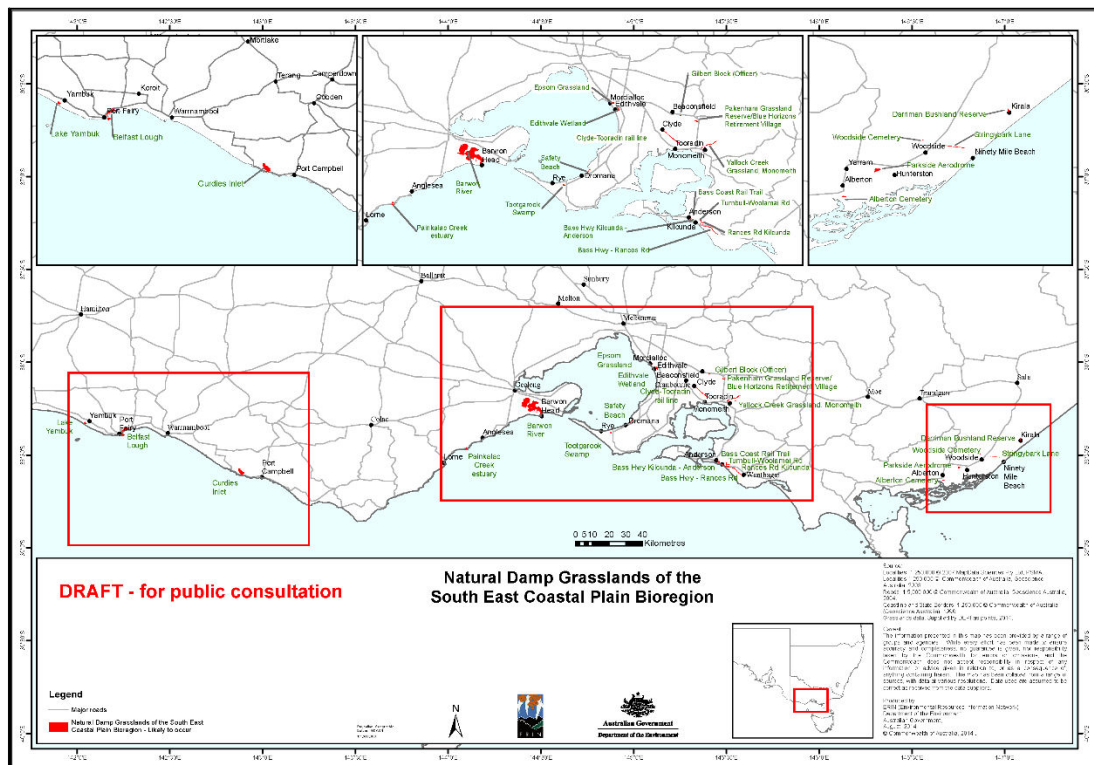
1.3. Key points

- Natural Damp Grassland of the Victorian Coastal Plains:
 - Must be a key focus, with appropriate recognition, and resources allocated to its identification, mapping, protection and actions for community engagement.
 - Less than 100 ha of this community exist. Much of that is reported to be along the Barwon River.
 - See Key issue below.
- Growling Grass Frog appears somewhat overlooked, especially along the Cowies Creek corridor, though we welcome the development of a conservation plan.
- Lack of conservation plans for Striped Legless Lizard and Golden Sun Moth, both present in significant numbers across NWGGA land. Seasonal herbaceous Wetlands also lack specific attention.
- Generally little mention of Striped Legless Lizard and Golden Sun Moth, despite significant numbers being found on private land throughout NWGGA and presumably waiting to be found elsewhere. An active survey program is needed.
- Many other endangered species overlooked, e.g. orchids.
- No discussion of the Melbourne Strategic Assessment. While we understand this is management by others, compliance matters when things go wrong are very much the problem of City of Greater Geelong.
- Compliance in general. While there is much welcome reference to positively engaging with private land for biodiversity benefit, there needs to be a corresponding focus on the compliance side of protecting nature.

- We suggest “Key community” is discussed alongside “Key species” throughout.
- Basalt Plains: Specifically mentioned the threatened Peak School Road as well as Old Melbourne Road.
- Discussions of grasslands. Describing grasslands as degraded does little to help their plight. Language needs to emphasise that these are (often) recoverable, with good tussock structure but lack forbs and have undesirable weeds present. These can and should be improved through thoughtful management, not discarded or deprioritised as ‘degraded’.
- We welcome the inclusion of the Fat-tailed Dunnart as a key species.
- We recommend having grassland-specific targets, otherwise this ecosystem will inevitably lose out to trees, wetlands and riparian systems.
- Biolinks Map lacks text suitable to aid viewer orientation and understanding. Which roads are we talking about?
- Roadside values not apparent on Environmental Values mapping.
- No mention on Northern and Western Geelong Growth areas, Geelong Strategic Assessment, Melbourne Strategic Assessment or Greater Avalon Employment Precinct and the threats consequent from these large landscape-scale planning moves.
- No discussion of the strength or weakness of so-called “protections” such as Environmental Significance Overlays.
- No mention of Grassy plains Network, VNPA or North West Alliance, despite our constant engagement with City of Greater Geelong.

2. Key issue: Natural Damp Grassland of the Victorian Coastal Plains

City of Greater Geelong should acquaint themselves with this EPBC-listed community. It is present in the City of Greater Geelong region and its protection must be paramount. From the map below, it is obvious that this ecological community is incredibly scarce, and that vitally important remnant exists along the Barwon River.



See:

<https://www.environment.gov.au/cgi-bin/sprat/public/publicshowcommunity.pl?id=133>

<https://www.dcceew.gov.au/environment/biodiversity/threatened/nominations/comment/natural-damp-grasslands-se-coastal-plain-bioregion>

<https://share.google/3iTleD8uJ1tddTuY1>

Discussion of this community needs to occur throughout the Draft Plan for Nature. The community urgently needs:

- Mapping
- Priority funding for restoration
- All protections available
- Community engagement
- A Conservation Plan