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To:

Inquiry into Ecosystem Decline in Victoria,
Parliament of Victoria Legislative Council, Environment and Planning Committee,
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**“Dust in the air suspended
Marks the place where a story ended.” (T S Eliot, *Little Gidding*)**

Ecosystem decline begins at home.

In Ardeer, west of Sunshine, in the City of Brimbank, the ongoing loss of permeable ground cover and mature trees due to medium-density subdivision contributes to storm-water surges that threaten the health of Kororoit Creek; and increased Summer temperatures that threaten human wellbeing.

The reduction in air quality is measured in rising rates of particulate matter and consequent respiratory health risks.

These are as much social justice issues (to do with equality of expectations for human wellbeing in a clean and safe environment) as they are environmental.

Indeed, in an urban setting, it is impossible to separate the two: urban planning is applied urban ecology.

Planning for extinction.

Natural Temperate Grasslands ecosystems, remnants of which are found in Brimbank, are listed as critically endangered under the Federal Environment Protection Biodiversity Conservation Act (1999).

On moister sites, such as that of my neighbourhood open space at 274 Forrest Street, Ardeer, tussock grasses predominate, particularly Wallaby Grass (*Austrodanthonia* spp. = *Rytidosperma* spp.), Spear Grass (*Austrostipa* spp.) and Tussock Grass (*Poa* spp.).

A survey conducted by Ecology and Heritage Partners in 2014 recorded sufficient coverage of these grasses on the Ardeer grassland at 274 Forrest Street for it to be protected under the Act.

Although the grassland is part of a modified urban landscape, the natural beauty of the Ardeer escarpment that the open space adjoins is given special mention in the *Kororoit Creek Regional Strategy 2005-2030*.

Crucially, given greater public awareness of the importance of biodiversity and of the declared Climate Emergency, the 2009 report of the *Senate Environment and Communications Committee Inquiry into Environmental Offsets*, raises an important philosophical and legislative point in relation to such urban landscapes.

“The ecological and social value of smaller potentially ‘urban’ grasslands needs recognition. Local groups have demonstrated that sustainable management and enhancement of small grassland reserves is feasible; these provide important biodiversity value and opportunities for community involvement.”

In anticipating the *Inquiry’s* next point, we note that in order to achieve a net gain of native vegetation, Victoria’s Native Vegetation Management Framework is three-pronged: a) to avoid adverse impacts, particularly through vegetation clearance; b) if impacts cannot be avoided, to minimise impacts through appropriate consideration in planning processes and expert input to project design or management; c) to identify appropriate offset options.

The report of the *Inquiry* goes on to say: “There is an over-emphasis on using Precinct Structure Planning process to work out biodiversity details. This appears to override the ‘avoid’ part of Victoria’s Native Vegetation Management Framework in favour of offsets, particularly for grasslands. ... This is not acceptable as the floristic differences mean that these areas contain unique and important habitat ... and are not transferable.”

Fast-track to destruction

The grassland, and the avenues of Sugar Gums planted by its industrial owner mid-20th century, at 274 Forrest Street, Ardeer, will be destroyed by the Level Crossing Removal Project’s (LCRP’s) chosen design for the replacement of the level crossing at Fitzgerald Road, Sunshine West, a fast-tracked electoral commitment.

LCRP justifies its occupying the site with an overpass embankment and road loop by a cost-benefit analysis weighted in favour of shortness of construction time. There are, of course, engineering alternatives to the design favoured.

This entirely avoidable contribution to ecosystem decline is a failure of a fundamental tenet of city planning -- that the function of the project must fit the chosen site.

When residents were letterboxed in late July 2020 by the Level Crossing Removal Project, the environmental argument was already lost.

The leaflet asserts: “Planning approval for this project will proceed under Clause 52.03 – Level Crossing Removal Project of the Brimbank Planning Scheme.”

Not only will a grassland, which was protected by its industrial owners throughout the 20th century, be lost, but so will the acknowledged beneficial experience of a relatively unstructured site, as relief from regimented urban space, be lost to residents of Melbourne’s West, along with the site’s place-making role in the community.

Eco snobbery and ecosystem decline.

Melbourne’s grasslands have an image problem. They appear to first-time visitors as somehow empty.

Although closer inspection, aided by informational signage, can reveal grasslands to be full of botanical interest, and to support many insects, animals and birds, the grassland at 274 Forrest Street, Ardeer, also has a story to tell of the area’s post-World War II expansion, and of its Aboriginal cultural history.

With responsible management, 274 Forrest Street, Ardeer, could be a whole-of-community social-history and biodiversity project; its remediation a vehicle for hands-on education in land management and plant biology.

These are knowledges and skills that create employment opportunities.

Instead, thanks to the draconian planning clause that sanctions its occupation by the LCRP, the future of whatever survives of the mature trees and remnant grassland of 274 Forrest Street, Ardeer, is to be that of a litter-strewn traffic island.

When environment departments of municipal land-managers are under-resourced, environmental protections are triaged. What starts as an expediency of miniscule budgets becomes an accepted practice by environmentalists compromised by career aspirations.

Deeming some environments less worthy because there is not the political clout to argue that remnant vegetation protections are inalienable, municipal environment departs and government agencies are complicit in ecosystem declines.

274 Forrest Street, Ardeer

In a neighbourhood in which, even though neglected by its land manager, avenues of mature Sugar Gums frame for the walker the experience of an open grassland with a long approach to a bend of Kororoit Creek, with a River Red Gum reflected in a deep pool formed by the basalt escarpment, ecosystem decline can also result from of lack of public information.

It does not have to be like that.

Established and newly arrived residents should be enabled to fully appreciate the geomorphology of the local creek escarpment; to identify grassland flora (including at least one Victorian-significant wildflower); and to become informed about reptile habitats, including the particular habitat conditions that favour Cunningham's Skink and the Striped Legless Lizard.

Environmental protections are inalienable responsibilities.

There are engineering alternatives to the design chosen for the removal of the level crossing on Fitzgerald Road that would celebrate as inalienable a whole-of-government responsibility to halt ecosystem decline.

Instead, the Level Crossing Removal Project's recourse to Clause 52.03 to pursue a design that occupies an historic open space shows contempt for zoning (Public Park and Recreation); the environment (Environmental Significance Overlay, and legislative protection of native vegetation; importance of biodiversity corridors); cultural heritage (Aboriginal Cultural Heritage overlay; post-WWII social and industrial history); and contempt for the health and wellbeing of residents of Ardeer (see policies on importance of protecting urban forests to counter the heat-island effect of the built environment; Brimbank's recognition of a Climate Emergency).

Ecosystem decline is a cumulative effect of what may appear in the cost/benefit analysis of the architects of Victoria's Big Build as an unremarkable loss of an environmental amenity.

Pedal to the metal, the Level Crossing Removal Project knowingly fast tracks ecosystem decline. It trumpets its recklessness by signalling to residents of Ardeer the use of Clause 52.03 to over-ride all environmental and cultural obstacles.

Penelope Webb, Ardeer, 30 August 2020