

Sunbury Maribyrnong Valley

Green Wedge Defenders

(member of Green Wedges Coalition

- a vision for Melbourne)

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SUBMISSION to the Parliamentary, Legislative Council
regarding their inquiry into the Impact of the State
Government's decision to change the
Urban Growth Boundary

The Sunbury Maribyrnong Valley Green Wedge Defenders (SMVGWDs) provides the following submission for consideration by the committee. We also request to be heard by the Committee.

Please ensure that no changes to legislation relating to the Government's proposal be considered by the Legislative Council until the completion of this Inquiry including the public presentation of findings and recommendations.

The State Government's decision to change the urban growth boundary on landholders and the environment and plans announced by the Government to introduce an increased development contribution for land in designated growth areas will have numerous negative impacts, some of which we will outline in our submission.

INTRODUCTION

SMVGWDs wish to object to **ANY** changes to the current Urban Growth Boundary (UGB).

“THE UGB MUST REMAIN FIXED – AT LEAST FOR THE NEXT 30 YEARS”.

Impact 1: The Environment and our city

The time allowed for assessing proposed major changes to Melbourne's Urban Growth Boundary was much too short. The consultation period should have allowed time for additional ecological studies and field work in spring and summer, and additional opportunities for community consultation. The environmental losses in the proposed trade-off are far too large and have been given scant assessment by Government. They are unjustified given the need for sustainable, consolidated urban development.

We reiterate, “Areas for investigation the Government has identified have NO STRATEGIC BASIS and are based on flawed policy and beliefs. The majority of these areas are inappropriate for urban development as were many of the areas on the outskirts of Melbourne that were devastated this year by bushfires. Numerous consultation and community submissions (including from the Green Wedges Coalition) over recent years have provided the Government with more than enough information to understand the benefits and needs of the Green Wedges, suggesting that this current exercise is merely a political move to grab more land for developers and that any “consultation” was nothing more than lip-service.”

Impact 2: Cost of infrastructure/cost to taxpayers, and affordability

This destruction is unnecessary: the Government has either misrepresented or miscalculated its land supply figures and there is enough land within the current UGB to last until 2030. Increasing the development density in urban growth areas would also make housing more affordable. Avoiding unnecessary infrastructure costs and using that money to better service existing areas could improve living standards for all Melbournians.

Impact 3: Loss of agricultural land

As successive premiers and planning ministers have said, the green wedges are the lungs of Melbourne. With a city already gasping for breath, Melbourne's lungs are about to be choked with urban sprawl. This government land grab will be a cancer, not just in the proposed new growth corridors but in surrounding areas, where developers are expected to buy up environmentally and agriculturally significant grasslands.

Maintaining agricultural land close to the city is critical in maintaining affordable produce to feed the increasing population. The cost saving and benefits to the state economy should not be overlooked.

The Sunbury Maribyrnong Valley Green Wedge Defenders wants to see green wedges preserved for a number of reasons including but not limited to the protection of environmentally and agriculturally significant areas and to preserve open space around key infrastructure assets such as airports.

Impact 4: Economic & Tourism loss caused by curfews at Melbourne Airport

Proximity to Melbourne Airport is a serious issue - much of the land now proposed for urban development in this area is covered by an airport overlay. If it is developed, there would be a strong likelihood that the residents moving in would demand airport curfews and thus limit the efficacy of the airport and its operations. We understand it is fairly basic good planning to preserve clear land around airports to avoid this kind of conflict such as has be-devilled Essendon. Having worked with local residents of the Bulla and Tullamarine areas to oppose various inappropriate developments, I am confident that this is likely to happen if the Sunbury Urban Growth Boundary is moved any further towards Melbourne Airport.

Impact 5: Community Expectations destroyed by ignoring current and historic Strategic Planning

HCC strategy plans to ensure the rural outlook surrounding Sunbury be maintained. Indeed recent studies have shown that there is ample in-fill and green field land within the current Sunbury UGB to cope with predicted growth for the next 30 years. As recently as last November the Government said the Urban Growth Boundary around Sunbury would not move and that further urban development around Diggers Rest would not be permitted...Yet this current proposal to expand the UGB in large areas to the West and North of Melbourne effectively closes the gap between Craigieburn and Werribee, creating one monster urban jungle. Many significant Aboriginal and European Cultural sites also exist in these areas...though not for much longer. The residents of the North West and West of Melbourne DO NOT want to live in an urban jungle.

This proposal does not provide solutions to the following issues that should be critical to any planning decisions:

1. Can we sustain such growth in some areas due to the lack of water, gas and electricity availability and other environmental constraints?
2. Can we sustain such growth when current infrastructure cannot cope with existing population demands, specifically public transport, roads, electricity, gas and water supply?
3. Why isn't there a population policy for Melbourne that limits growth? (Melbournians do not want to lose the character and open spaces of their city to become a huge metropolis like Sydney).
4. Why is the State Government encouraging rapid population growth through immigration when they should be demanding a moratorium to allow time for current infrastructure inadequacies and problems to be rectified?
5. Why does Victoria have to accept uncontrolled growth at levels only seen post war when there was a valid reason to encourage growth?
6. Why do we have to keep making submissions about what we value about the green wedges?

Sunbury Maribyrnong Valley Green Wedge

After repeated assurances by three planning ministers (including Minister Madden in mid-November 2008) that the Urban Growth Boundary around Sunbury would remain intact, the Sunbury Maribyrnong Valley Green Wedge Defenders (SMVGWDs) were shocked to find

that Sunbury would double in size as a result of the proposed green wedge land grab. This is also a substantial contradiction to Melbourne 2030, which stated that urban growth should occur only in growth corridors and which did not designate Calder Highway as a growth corridor.

Furthermore, substantial parts of the investigation area are covered by an Airports Overlay and that residential development there would probably lead to an airport curfew, negatively impacting both economic and tourism opportunities.

Although part of the volcanic plain, the green wedge landscape and the native vegetation surrounding Sunbury differs to the rolling or flat plains occurring west of Melbourne, or around the Hume growth corridor to the north. Jackson's Creek gorge dissects the landscape. Its steep escarpments and vegetation such as streambank shrubland and FFG listed Rocky Chenopod Open-scrub, provide valuable habitat for a diversity of reptiles (including possibly EPBC listed Grassland Earless Dragon) as well as raptors and black wallabies. The Sunbury area also supports widely scattered remnants of Plains Grassy Woodland, which are dominated by Grey Box rather than Red-gum, and small remnants of Plains Grassland and Grassy Wetland.

Whilst the creek gorges and associated habitats are proposed to be retained in waterway reserves in most places, remnant vegetation above the escarpment is often in proposed residential areas, and at least some high conservation value sites have been missed by the consultant ecological report.

SMVGWDs requests to the Minister to protect the following environmental and heritage sites near Sunbury in State reserves were also ignored:

- **Emu Bottom**, where Victoria's oldest homestead, surrounding native forest and 25 ha working farm on the Jacksons Creek are threatened by a four-lot housing subdivision application approved by Hume Council and VCAT despite its heritage register listing.
- **Bundanoon woodlands and grasslands** a biodiversity site of regional ecological significance with highly significant flora and fauna including rare woodlands and grasslands; remnant flora unique to Hume; many native birds and animals including wedge-tailed eagles and sacred Aboriginal ceremonial (Bora) rings. Threatened by proposed subdivision into one hectare lots. (Sunbury, Melway: 362 A6)
- **Extension and expansion of development along Lancefield Road**
This area is high plain lying immediately to the east of the Emu Bottom stretch of Jacksons Creek. The State Government/DSE map of Sunbury shows nothing along Lancefield Road that escapes development except a valley and waterway that arises from Jacksons Creek. This reserved area inexplicably excludes a **natural wetland area** immediately to its north where there is a great deal of remnant indigenous vegetation. The water is also extensively used by birds.
The railway line runs east of and parallel to the escarpment that drops down to Jacksons Creek in the Emu Bottom area. This volcanic plain between train and escarpment forms part of the escarpment ecosystem, inhabited by **Eastern Grey Kangaroos** and **Black Wallabies** that can be seen from the river flats below. Raptors, mostly **Wedge Tailed Eagles** and **Whistling Kites**, rarely **Little Eagles** are regularly seen hunting above this area, suggesting it is habitat for other small animals. On-ground inspection of the area mooted for development reveals many other areas of remnant grasslands, including extensive stretches along the railway line of **kangaroo grass (Themeda triandra)**.

Jacksons Creek (Which becomes the Maribyrnong River at Melbourne Airport) is already struggling to cope with pressure from existing urban areas, as demonstrated by the photograph taken in Sunbury this morning.



Jacksons Creek Sunbury 12.7.2009

We believe destruction of these habitats is both unacceptable and unnecessary.

Recommendations:

- Jacksons Creek valley should be declared a public reserve, protected from all development, and have environmental significance overlays applied to a minimum of 200 metres from the top of each bank.
 - Similarly, a 200m reserve should be declared each side of the railway and environmental overlays applied.
 - A minimum 500m buffer along the edge of all escarpments should be created.
- Development to south-east of Sunbury impinging on Holden Flora and Fauna Reserve:
Holden Flora and Fauna Reserve is an extraordinary, hitherto under-recognised, natural resource in the North West of Melbourne. Its recognition level is changing. Jacksons Creek EcoNetwork recently held an Open Day that attracted more than 160 people from all over Melbourne. There is no doubt the area is now valued.

The Holden Reserve Management Plan (Parks Victoria, 1998) describes:

Geological features, including fossil beds, of regional significance, which they believe are a “considerable educational resource.”

Native vegetation of at least regional significance, including two communities (Western Basalt Plains Grassland and Rocky Chenopod Open-scrub) listed as threatened under the Flora and Fauna Guarantee Act.

There are a number of **flora species classified as rare or threatened** or significant in the Melbourne area.

Many species with **National Fauna Significance** are present.

The reserve contains one of three remaining populations of **Southern Lined Earless Dragon**, whose rocky grassland habitat is restricted to narrow strips along the creek escarpment.

There is a high density of **reptile fauna** (25 species), including regionally threatened and restricted species like Red-bellied Black Snake, Lowland Copperhead, Marbled Gecko and Tree Dragon.

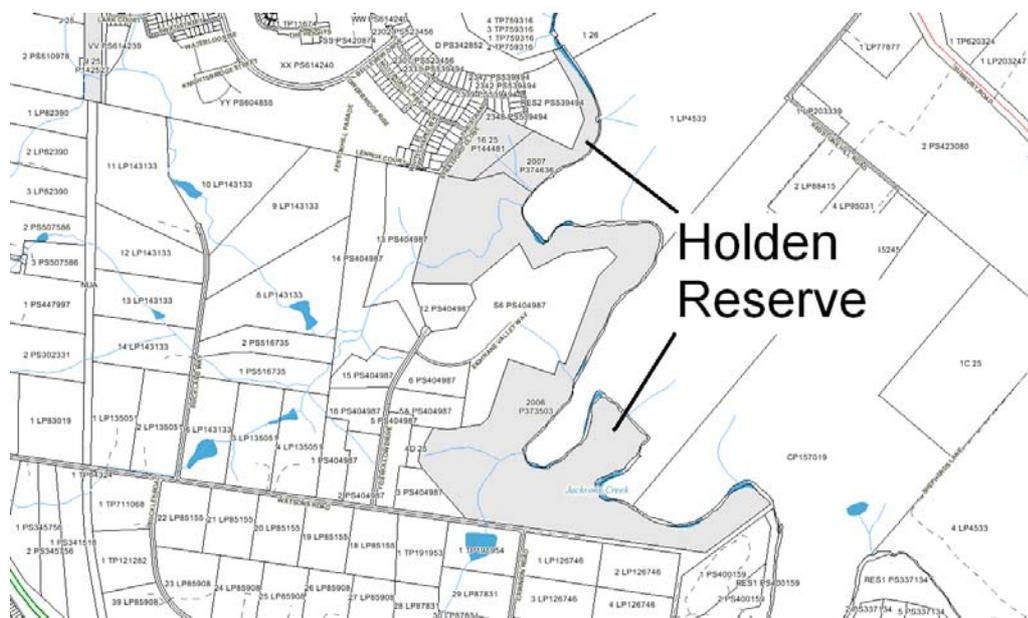
Rare or restricted shrubland bird species recorded along creek escarpment include Southern Whiteface, Spiny-cheeked Honeyeater, Singing Honeyeater, and Diamond Firetail.

Other regionally restricted bird species include **Peregrine Falcon**, Calmanthus, and Pied Currawong.

The creek offers important habitat for **Platypus** (5 were captured in a recent survey) and **Leseur's Frog**, which are regionally rare and threatened.

The Reserve, although 96 Ha in area, is vulnerable in two ways:

1. It is long and narrow. This opens it to "edge effects" where weeds and pest animals (including domestic pets) can readily invade.

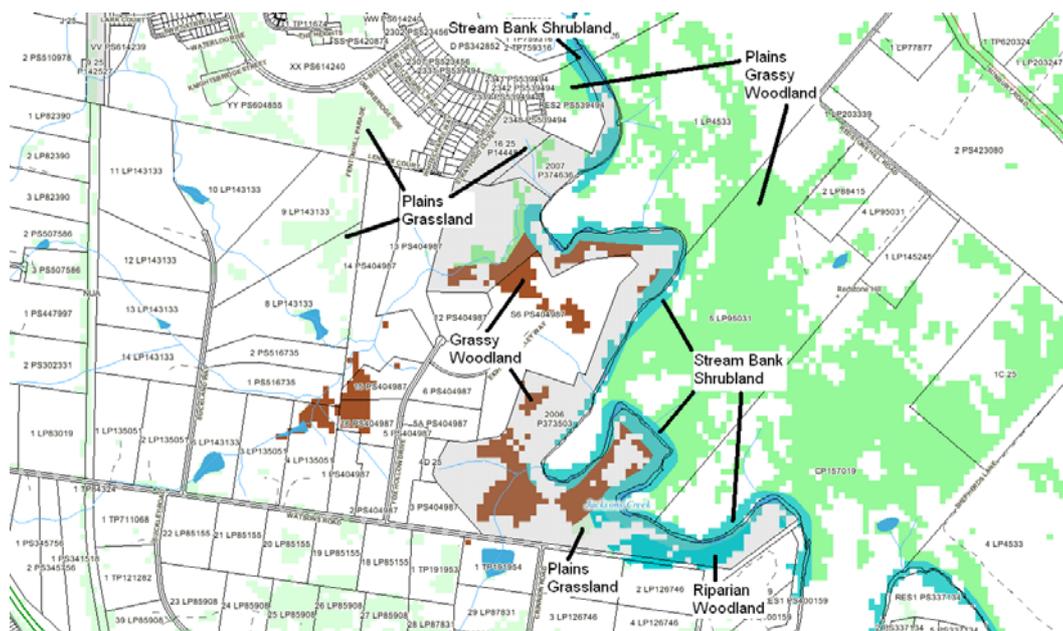


Map 1 Area between Sunbury and Diggers Rest showing Holden Reserve

2. It lies along one side only (West) of Jacksons Creek. Because the rocky escarpments are on the East, Parks Victoria does not have jurisdiction over areas of habitat essential for some of the rare and threatened animals mentioned above (Southern Lined Earless Dragon, the shrubland bird species and the Peregrine Falcon which nests on escarpments.)

The proposed Urban Development not only destroys valuable EVC and habitat, it makes the above problems impossible to rectify.

The map below shows the Reserve in grey, Grassy Woodland (brown), Plains Grassy Woodland (green), Riparian Woodland (dark blue) and Stream Bank Shrubland (Blue). **All these EVC are considered "endangered"**. The escarpment is roughly to the east of Jacksons Creek, on your left as you move downstream.



Map 2 Area between Sunbury and Diggers Rest showing EVCs

The proposed Urban Development to the east of Jacksons Creek will **destroy a large swathe of Plains Grassy Woodland** above the escarpment. On ground inspection shows this woodland is not mere marks on the map. In particular, blocks 5LP95031 and CP157019 contain considerable density of woodland.

Development will **impinge on the escarpment** and the Stream Bank Shrubland, which is habitat for Southern Lined Earless Dragon, the shrubland bird species and the Peregrine Falcon. Peregrine Falcons are shy birds that nest in escarpments. It is the practice to close off areas like Lederberg Gorge in the breeding season. To date this has not been necessary because of the isolation of the southern regions of Holden Reserve, but it would not even be possible with housing so close.

Further development is proposed to the south east of Holden reserve, which will destroy Grassy Woodland and Plains Grassland. In the area around Eighnane Valley Way (block S6 PS 404987) it will **bite into Holden Reserve at its narrowest point**. The vulnerability at this point has already been explained.

Recommendations:

- The plateau to the east of Holden Reserve should not be developed.
- The escarpments plus at least a 500m buffer zone from the top of the escarpment must be Reserved have Environmental Significance Overlays applied, and be added to Holden Flora and Fauna Reserve for care by Parks Victoria.
- The area to the south of Sunbury (between Sunbury and Diggers Rest) should not be developed beyond existing zones. No further residential zone or GWAZ should be applied to land to the south, south-east and east of Sunbury. As indicated by the major reserves and parklands that bound much of this area (including Woodlands, The Organ Pipes National Park and Holden Flora and Fauna reserve, this land has significant waterways, vegetation, habitat, fauna and provides a critical buffer to Melbourne's International Airport. Any impingement would have significant detrimental impact on the operation and functioning ability of Melbourne Airport.
- It is essential that the riparian area around the Western Water Sewage Treatment Plant and further upstream to Sunbury and the area known as The

Nook should be retained as a wildlife corridor in order to maintain the link between Holden Flora and Fauna Reserve and areas north of Sunbury as a wild life corridor.

Very inadequate assessment of ecological impacts

The full ecological impacts of the UGB expansion will be large, but Government is making little effort to assess them, or the value of remnants proposed to be cleared. The main document assessing impacts and recommending mitigation measures is the EPBC Strategic Impact Assessment Report, yet this only deals with nationally listed species and Plains Grassland and Grassy Woodland. The consultant ecological reports for each investigation area have considered state and regionally significant flora and fauna to some extent, but their recommendations are not referred to elsewhere.

On-site native vegetation mapping not done for most urban investigation area

For only for a minority of the urban investigations areas has on-site native vegetation quality mapping been undertaken – mainly for the Werribee Plains, and some areas near Mt Cotterell and Caroline Springs – and the extent of previous ecological surveys is limited. Assessment of most areas has had to rely on DSE's existing satellite data modelling of vegetation types, and aerial photos and rapid assessment – typically from roadsides. Whilst this gives a regional overview of the location of grasslands and other ecosystems, at a site-specific level some high quality remnants have been missed altogether and ploughed paddocks have been mapped as remnant grassland. The assessment for the northern investigation areas in particular has often been inaccurate and confuses existing native vegetation data.

Lack of threatened species survey

There has been almost no on-site survey for threatened flora and fauna species, except for rapid assessments for Southern Brown Bandicoot and Growling Grass Frog in the southeast, and Golden Sun Moth at some sites in the west and north. Much of the limited vegetation quality mapping was undertaken in summer when many grassland species are not detectable. Also the EPBC report provides very little assessment of the significance of different sites inside the expanded UGB for conserving threatened species. State Government intends that more detailed flora and fauna surveys will be undertaken to inform urban precinct plans – however as has been the case since the beginning of the Growth Areas Authority, development pressures at this later planning stage will make it difficult to retain significant areas for conservation.

Grasslands

Higher quality grasslands inside the urban investigation areas will be lost. These grasslands are heavier soil, Kangaroo Grass grasslands, different to the lighter soil Stipa-Danthonia dominated grassland which occur across the Werribee Plains. The higher quality grasslands close to Melbourne (and inside the existing UGB) need to be protected. Loss of grasslands, grassy woodlands inside expanded UGB cannot be replaced. Whilst the proposed grassland parks are welcome, we must also protect the higher quality habitats inside expanded UGB.

DSE have assumed that it will be open-slather for grasslands in the west inside the expanded UGB. From review of the UGB maps it appears that the Boral quarry exclusion area might protect large areas of the Ravenhall grassland south of Caroline Springs- but this is expected to be quarried - to provide for the new development. The relatively small, but species rich Clarke Rd grassland is identified for protection. Any grasslands to be protected inside the UGB in the west are to be 150ha + and /or have multiple EPBC species present.

For the northern and south eastern investigation areas it is a different story. DSE acknowledge that the flora and fauna assessments have been less thorough, so the location of areas retained for biodiversity will be based on detailed flora and fauna assessments as part of the precinct structure planning process. It is unclear whether the broad areas to be set aside for biodiversity (as shown on the draft UGB maps) e.g. grassland and grassy woodland along the east side of Merri Creek, would be delineated with precise boundaries when the UGB is decided on (i.e. not zoned Urban Growth Zone), or whether they would also be decided on as part of the precinct structure planning process. There seem to be many uncertainties about the protection of grasslands and grassy woodlands in Hume and Whittlesea.

DSE pointed out that the draft UGB had already been chosen to avoid important habitats, e.g. grasslands west of Werribee, grassy woodlands in Whittlesea east of Merri Ck, and Golden Sun Moth habitat NW of Mt Ridley.

Why grasslands are important:

- Grasslands of the volcanic plains are one of Victoria's most endangered ecosystems, with less than 15 per cent of original cover remaining.
- Volcanic Plains Grassland is listed as Critically Endangered under the Federal EPBC Act. It is also listed under the State Flora and Fauna Guarantee Act 1988.
- Grasslands of the western volcanic plains are home to 68 threatened animal species and 26 threatened plant species, including:

Animals: Plains-wanderer (bird), Grassland Earless Dragon, Stripped Legless Lizard,

Golden Sun- Moth and Fat-tailed Dunnart (mammal).

Plants: Button Wrinklewort, Tough Scurf-pea, Spiny Rice Flower and Clover Glycine.

- Twenty-five fauna species and 32 flora species, listed or nominated under the EPBC Act, have been identified as potentially occurring within the program areas. Key threatened species that will be impacted include:

- Striped Legless Lizard.
- Golden Sun Moth.
- Growling Grass Frog.
- Matted Flax Lily.
- Spiny Rice Flower.

- There is an estimated 20,000 ha of remnant grassland of varying quality to the west and north of Melbourne, with the largest intact portions clustered around Melbourne's western boundary.

- Grasslands are often called wildflower meadows because of their spectacular and delicate flower displays in spring.

Proposed urban growth expansion area and grassland destruction

The State Government is proposing a major expansion of Melbourne's urban growth boundary in the west, north and south east of the city. The largest area of expansion will be in the west and north and will destroy significant areas of grassland and grassy woodlands.

Almost 8000 ha of grassland and grassy woodlands will be cleared, including:

- 6918 ha of grassy woodland in Melbourne's western and northern suburbs.
- 924 ha of grassy woodland, mostly in the northern suburbs.

Some small areas are proposed to be set aside within the new growth areas:

- 530 ha grassland in Wyndham–Melton non-urban area.
- 700 ha grassland in Melbourne's north.
- 600 ha of grassy woodland in the north.

There are five specific urban growth areas that need to be investigated in detail:

1. Wyndham – Melton Growth Area.
2. Caroline Springs Growth Area.
3. Sunbury.
4. North – Merri Creek Corridor-Whittlesea Growth Area.
5. South East Melbourne – Casey-Cardinia Growth Area.

Grassland Reserves Proposal

Two large grassland reserves totaling 15,000 ha are proposed outside the planned growth areas adjacent to the You Yangs Regional Park. These reserves are on private land and will need to be purchased by the State Government, with an approximate cost of \$250 million with \$190 million for acquisition and \$60 million for management. This is planned to be funded through a property developer paying for clearing through offsets.

The reserves are proposed to be established over a 10 year period, via a purchase and public acquisition overlay. This timeline needs to be significantly shortened to be less than five years and new reserves secured before any clearing is allowed.

State Government intends large grassland park on the Werribee Plains, and another about Mt Cotterell, totaling about 15 000 ha, and protecting 20% of volcanic plains grassland c.f 2% now.

Proposed to be acquired through Public Acquisition Overlay (National Parks status or similar) with provision for compulsory acquisition after 10 years at market rates if voluntary acquisition doesn't work. The park will need "specialist adaptive management". Large areas are degraded and need to be restored. Government will be relying on offsets from clearing inside UGB to fund acquisition and management - though the arrangements for this have not yet been worked out.

DSE will rely on expertise of Land Vic and VicRoads for public acquisition. Bush Broker scheme might be involved, but not sufficiently well developed to do the job by itself. They are looking at incentives for park landholders to start managing grasslands early on.

- New reserves: The proposal for 15,000 ha of new grassland reserves is great news, but is no excuse for the massive amount of clearing proposed. These reserves exist on different soils and therefore have significantly different floristic make-up compared to those grasslands that exist within the proposed development areas. This means that grasslands within the UGB may not be directly comparable with those outside.
- No clearing should be allowed until new reserves are in place. It is also absolutely critical that any new reserves are locked in as quickly as possible before property developers or the State Government start clearing for new housing or infrastructure.
- National parks: Any new reserves should have the highest level of protection and be declared national parks.
- Lines on maps are not enough, up front funding is required. It is very easy to draw lines on maps, but the purchase of private property for new national parks could cost hundreds of millions of dollars and take many years, even decades, leaving the fate of the grasslands open to the whims of multiple state and federal election cycles or speculative clearing by property owners. This means upfront funding for the new reserves needs to happen now.
- New parks should be delivered within five years. The reserves are proposed to be delivered within 10 years, while clearing will take 20 years. The areas for potential reserves may be damaged or neglected during this time while property owners decide to sell or not. Reserves should be delivered within five years, and a strict implementation timetable should be established.
- Funding. As yet there is no detail of how the new reserves will be funded. There needs to be at least \$50 million if not more provided up front to ensure reserves are purchased before clearing commences.

If the proposal is to survive the inevitable changes in governments, there also needs to be a transparent and robust funding plan that includes:

- Establishment of an independent trust, with strict terms of reference, overseen by an independent board of trustees at arm's length from government - A publicly available register of all clearing and offsets.
- Are the new reserves enough? There is no strict "net gain" assessment proposed in the Strategic Impact Assessment Report, so it is unclear if the level of clearing meets the State Government's own Native Vegetation Framework. There appears to be an over-emphasis on offsetting. The report clearly states that "offsetting is the primary way to mitigate impacts" (p3) as opposed to "avoidance, minimisation", which is required in the state's Native Vegetation Framework.

Clearing inside proposed growth areas

Of the almost 8000 ha of habitat to be cleared within the proposed urban growth boundaries only a very small amount is proposed to be retained as part of the public open space network including:

- 530 ha grassland in Wyndham-Melton non-urban area.
- 700 ha grassland in Melbourne north.
- 600 ha of grassy woodland land in the north.

There are some very high conservation significant areas proposed to be cleared and more work needs to be done to retain as much habitat as possible.

Developer Biodiversity Levy

Wyndham Council's proposal for a \$25 000 biodiversity levy of landholders / developers on top of the \$95 000 infrastructure levy ("Gate Tax") has been rejected at this stage by State Government. We think it is worth pursuing this or similar scheme as an alternative to relying on offsets from clearing to fund new grassland parks. The latter proposed approach makes it almost impossible to protect both grasslands inside UGB and have new grassland parks, and it provides an incentive for clearing. Wyndham's proposed developer levy is across all properties whether cleared or not, and could (although Wyndham didn't propose this) be used to fund setting aside grasslands inside UGB. In this way it could overcome the problem with the motivation to clear, especially if coupled by a rate rebate / exemption for landholders who retain grasslands.

Executive Summary

Environmental, community, farmers and green wedge groups want green wedge land grab stopped. The proposed large-scale expansion of the urban growth boundary will accelerate Melbourne's car dependent urban sprawl, resulting in loss of nearby green wedges and threatened habitats and a less liveable city.

The proposed UGB expansion is unnecessary to provide for housing and industrial sites, as if Government implements its own housing density target of 15 lots / ha (of gross developable land) there is enough land in existing growth corridors to last for 19 years, or 20 years if a modest target of 20 lots / ha (gross) was implemented¹. Urban infill development and higher density redevelopment along train lines is much cheaper, and results in much less greenhouse pollution than outer-suburban sprawl².

State Government plans for a green wedge land grab of 41, 663 ha will take nearly twice as much land as expected. Last December, in a report increasing Melbourne's population target from 4 million to 5 million, Government said 22,833 ha of green wedge land was needed for development, but they now propose to hand 26,093 ha to property developers. While a further 15,570 ha is described as unsuitable for development, it is unclear whether any of this is to be protected for its environmental significance.

The implementation of the proposed grassland parks is far from certain as acquisition and management relies on offsets from clearing inside the expanded UGB, over a 10 year time period or longer.

Importantly the grassland parks will not make up for, or justify the loss of high quality remnant vegetation at the edge of Melbourne, which represents different grassland types and important populations and habitats of threatened species. They will not meet the offset

¹ From analysis by Green Wedges Coalition

² Researchers at Curtin University, WA, have reported that up-front infrastructure costs were \$50.5 million for inner city redevelopment versus \$136.00 million for new outer-suburbs, whilst the net present value of on-going transport costs over a 50 year time period, was \$256.8 million for inner city redevelopment versus \$507.1 million for outer-suburbs. ("Assessing the Costs of Alternative Development Pathways in Australian Cities", Romon Trubka et al 2008, Curtin University Sustainability Policy Institute, Fremantle.)

requirements of the Native Vegetation Framework, and environment groups understand State Government intends to waive Net Gain offsets for the UGB expansion.

The proposed expansion of Melbourne and freeway reserve will destroy:

- 6,900 ha of the State's highest quality remaining western basalt plains grassland, whose biodiversity rivals Kakadu;
- 924 ha of grassy woodlands in the Darebin, Jackson & Merri Creek valleys, including 400 year-old red gums;
- Prime market garden land in the Westernport Catchment, an important food source for Melbourne;
- Southern Brown Bandicoot habitat near the Cranbourne Royal Botanic Gardens;
- The historic township of Wollert, to be razed for another freeway, parallel to the Craigieburn Freeway; and
- An estimated 200 homes and family farms, blighting the future of hard-working farming families.

The 15,000 ha of grassland reserves to be provided over 10 years as a trade-off is of poorer quality than the kangaroo (*thameda*) grasslands that will be destroyed. Previously the State Government has not implemented its own clearing controls to protect grasslands – thus it cannot be trusted to protect the proposed reserves, which may degrade and be forgotten before Government has to acquire them.

The 22,000 ha of remnant grasslands currently located in Melbourne's green wedges is about 30 % of the five per cent left of the western plains basalt grasslands that once stretched from Portland to the Melbourne.

In an appalling move the Government plans to destroy 10% and to protect 20% in developer-funded reserves, exposing the hollowness of its Net Gain policy.

- We welcome the proposed new grassland reserves of 15,000 ha. but more needs to be done to protect the high value areas proposed to be cleared for urban development.
- Grasslands of the volcanic plains are one of Victoria's most endangered ecosystems, with less than 5% of original area covered extent remaining.
- Volcanic Plains Grassland is listed as Critically Endangered under the Federal EPBC Act. It is also listed under the State Flora and Fauna Guarantee Act 1988.
- Grasslands of the western volcanic plains are home to 68 threatened animals and 26 threatened plants, including the Plains-wanderer, Grassland Earless Dragon, Fat-tailed dunnart and Clover Glycine.
- The government is proposing a major expansion of the urban growth boundary in the west, north and south east of Melbourne. The largest area of expansion will be in the west and north and will destroy significant areas of endangered grassland and grassy woodlands, endangered in the Victorian Volcanic Plains and Gippsland Plains Bioregions.
- Almost 8000ha of grassland and grassy woodland will be cleared.
- Grasslands need to be protected in reserves upfront and as soon as possible, before clearing is allowed.

We strongly and totally oppose any changes to Melbourne's Urban Growth Boundary. If as we expect, the State Government proceeds without considering the consequences, as a minimum they must:

- Protect from urban development:
 - all land around the existing boundaries of Sunbury and the Diggers Rest township, preserving the existing buffers and overlays around Melbourne Airport
 - all significant grasslands and current or extinct wetlands in the Werribee- Melton Corridor,
 - all significant grasslands, red gum woodlands and wetlands in the Merri Creek catchment.
 - significant grasslands and habitat corridor in the Merri Creek Valley
 - essential farmland and fauna habitat in the Westernport Green Wedge
 - riparian strips at least 100m wide along creeks and watercourses;
 - all other environmentally significant land identified in the Environment Victoria submission.

- Provide further protection to environmentally significant grasslands and grassy woodlands in the investigation areas by:
 - using the estimated \$90 million annual Melbourne Water parks levy to acquire highly significant areas for national parks;
 - providing incentives to landholders, via Bushbroker, Bush Tender and Grow West schemes;
 - funding Trust for Nature for rolling purchases in the green wedges, for on-selling with covenants.
 - encouraging Councils to provide conservation rate rebates for at least TfN covenanted properties.

- Restore the 2005 developer levy. However the Minister's statements indicate that they will, so they need to:
 - amend the proposed new infrastructure levy to exempt landholders who sell their properties to conservation landholders or farmers, so that the levy is payable only if/when the land is sold, rezoned or subdivided for development.

The Urban Growth Boundary should not move in ANY areas and a population cap should be urgently applied to Melbourne.

Increased densities and other mechanisms can and should be adopted to cope with any predicted growth.

Yours faithfully,



Arnie Azaris
Coordinator