

Green Wedges Coalition

- a vision for Melbourne

October, 2009

Joint Coordinator: Rosemary West

Phone: 9772 7124

rowest@ozemail.com.au

14 Dudley Grove, Edithvale 3196

SUBMISSION TO LEGISLATIVE COUNCIL OUTER SUBURBAN/INTERFACE SERVICES AND DEVELOPMENT SELECT COMMITTEE INQUIRY INTO THE IMPACT OF STATE GOVERNMENT'S DECISION TO CHANGE THE URBAN GROWTH BOUNDARY

Terms of reference:

The Committee has been asked to investigate the State Government's decision to change the Urban Growth Boundary, and in particular:

The impact of 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, including —

- (a) the likely quantum of the collections by Government;
- (b) mechanisms to ensure the contributions are directed only to the intended purposes;
- (c) the likely impact on the housing and development industries;
- (d) any unintended consequences including the impact on all landholders and purchasers to be impacted;
- (e) any displacement or replacement of Government spending likely to result from the increased collections; and
- (f) any alternative options, including any used in other jurisdictions;

1. Background: Green Wedges and the role of the Green Wedges Coalition

The 1968-71 metropolitan planning process officially established nine Green Wedges as non-urban zones between Melbourne's main urban development corridors. It outlined acceptable non-urban uses, including recreation, flora and fauna conservation, landscape protection, resource utilization and farming. The protection of public land and of public open space is integral to the first two of these uses, but not necessarily to the others.

These non-urban zones, together with metropolitan parks and other fringe areas of special significance play a vital role in protecting areas which are critical for Melbourne's future as a livable city. They have been further protected by legislative and planning provisions introduced as part of Melbourne 2030, which added a further three green wedges.

The Green Wedges were to be Melbourne's breathing spaces, to separate the urban development designed to be confined to the transport corridors. But while development spread out along the transport corridors, there was increasing pressure on municipal councils to permit the development of the Green Wedges for residential and industrial uses. Hence in May 2002, representatives of the main environment or Green Wedge defender groups in each of Melbourne's nine green wedges formed the Green Wedges Coalition to make representations to State Government and to the Opposition for green wedge protection. (Attached please find the Green Wedges Charter which outlines the history of green wedges and our analysis of what policies are needed for their protection.)

In this we were successful when the State Government announced green wedge protection policies before the 2002 election to protect Melbourne's green wedges from subdivision and inappropriate urban uses. Opposition support for the green wedge protection legislation passed through the Legislative Assembly before the 2002 election meant support was bipartisan. (While a similar bill reintroduced after the election was not supported by the Opposition we were assured by the deputy leader Mr Honeywood that this was for process reasons and did not imply any withdrawal of Liberal support for green wedges.)

We now have 160 environmental and community group members, including resident, ratepayer and progress associations and strong community support, coordinated by the peak environment coalition or green wedge protection or defender group in all of Melbourne's 12 green wedges. (Please see attached our constituent membership list.)

2. Introduction

The Green Wedges Coalition submission will address the State Government's decision to change the Urban Growth Boundary in a broad sense.

2.1 In response to the terms of reference, our submission will pay particular attention to the impact of the State Government's disastrous decision to change the Urban Growth Boundary on the environment. This will include its impact on sustainable agriculture, both in the South East food bowl, which is severely impacted, and on the grazing and other successful agricultural activities in the western plains and Jackson and Merri Creek catchments.

The principal purposes/objectives of Melbourne's Green Wedges, at the top of the lists in State and local planning scheme provisions, (?? check) are the protection of the environment and the protection of agriculture. These – combined with the importance of maintaining space between rural areas and the importance of providing open space for recreation - are fundamental to the concept of the green wedges as the lungs of Melbourne.

We also include some comment on the protection of open space currently in the green wedge areas proposed for urban development and on other purposes – the protection of mineral resources and of buffers around infrastructure such as sewerage treatment plants

are also important, but it would be a great shame if the green wedges were whittled away until they did nothing else.

2.2 We are also extremely concerned at the impact of this decision on the approximately 3,000 landholders, give or take 8-10 large developers who are the main beneficiaries of this piece of atrociously bad planning. We have no doubt that many of these developers will be rewarding State Government and perhaps other MPs in the form of political donations.

I do not personally know many developers, but at Minister Madden's famous fundraising lunch at the Rialto on 14 July this year, while waiting with other community representatives to present the resolutions of a protest meeting to the Minister, I did spot the principal of a planning consultancy that was involved in the only successful application for a residential housing development on green wedge land since 2002. (This was John Woodman, of Watsons, which successfully steered the Wyndham Cove Marina Project through a planning panel and ministerial approval process to rezone green wedge land for residential development. The developer in this case was Perpetua, whose principal, Angus Reid, is now on the run from the authorities in Dubai, having left two colleagues to face jail, after his company came unstuck in a development there. The Wyndham Cove Marina development has not gone ahead, thus no doubt dashing the hopes of some Werribee residents who were persuaded to support it by promises of beachfront cafes at a new beachfront resort which was to be serviced by a ferry service to Melbourne. Watsons are also well-known for their Martha's Cove development on the Mornington Peninsula.

After Mr Woodman and Mr Reid presented to the Western Region Environment Centre Board which I attended on behalf of GWC, WREC coordinator Harry van Moorst and I were invited to lunch by Rob Gell, who was employed as a consultant for the project and who wanted to know what he would need to do to make this development acceptable. We told him the only thing that would make this development acceptable would be for it to go away, and we paid for our own lunches. This development would have very serious environmental risks, including the possibility that it might allow seawater to leach into the freshwater aquifer that largely waters the Werribee South Market Gardens and it was approved on condition that the environmental risks were suitably managed.

The Planning Minister at the time, Rob Hulls, did intervene to stop another development application by Watsons for a golf course housing estate at Keysborough, which he rightly pointed out was "housing development by stealth," a description we would also apply to Wyndham Cove.

Our membership includes many green wedge landholders, including some, such as Frances Overmars, coordinator of the Western Plains North Green Wedge Group, who has been tending a precious native grassland on her family property, which is included in the proposed new Urban Growth Area. Frances also works with a number of community groups to look after local grasslands on public lands. She has been told her own grassland will be protected by an easement for the overhead powerlines that cross it, but

the prospect of being surrounded by suburban development obviously has serious adverse implications for both the amenity of Frances's family home and for their grassland.

2.3 We will also briefly discuss the proposed Growth Areas Infrastructure Tax, which has been a threat to the security and property values of conservation landowners like Frances Overmars as well as farmers and lifestyle landowners, though we will leave the detailed discussion to the Taxed Out group.

In our view, the best way to stop the GAIC would be for the Opposition parties to vote down the whole Urban Growth Boundary relocation.

We oppose this tax because of its fundamental inequity to landowners and support the Taxed Out position of support for an infrastructure levy on developers, such as the one that was imposed by State Government in 2005 on developers in the land removed from the green wedge in that year. This levy, of \$5000 per lot, yielded approximately \$80,000 per ha. at a density ratio of.....

The Minister announced that this levy would be removed, but we presume that if the GAIC is not approved, the earlier levy might remain on land within the existing UGB. In our view this would be a far better outcome.

3. The State Government's decision to change the Urban Growth Boundary on Green Wedges: what is involved, why it is unnecessary and contrary to good planning policy and how it threatens the Green Wedges

The UGB changes proposed in the Melbourne @ 5 million ([M@5M](#)) report and in the current Delivering Melbourne's Newest Sustainable Communities (DMNSC) report will in our view seriously erode the green wedges. The DMNSC report proposes to excise a further 41,663 ha from Melbourne's green wedges, nearly twice the 22,855 ha estimated to have been needed in last December's Melbourne @ 5 Million report. Of that 41,663 ha, 26,093 ha is said to be needed for development and a further 15,570 is described as significantly constrained, but it is unclear how or whether any of this is to be protected for its environmental significance.

The proposed expropriation of green wedge land contradicts the Government's 2005 promise, when 11,500 ha was excised from the green wedges, that it would last until 2030. This removal had been foreshadowed by the consultation process that followed the introduction of the Urban Growth Boundary in 2002. Of 600 submissions relating to the UGB in 2003, roughly a third were approved, another third were refused and a third were referred to the Smart Growth Committees. With one or two exceptions that we queried, the removal of the 11,500 ha was the outcome of the Smart Growth Committee process. Because of this and because it was promised to last until 2030, we accepted these changes.

The proposed hand-over of green wedge land for development also contradicts:

- the recommendation of the Melbourne 2030 Audit Committee in March 2008, that there was no need for any further review of the UGB for at least five years. (discussed below)
- undertakings in letters signed by the Minister and a senior officer just weeks before the Government's Melbourne @ 5 million announcement that no review of the UGB was then underway.
- The Minister's undertaking to us in 2006 that he would not undermine any of the achievements of his predecessors, eg that the Calder Highway would not become a new Growth Corridor and that the UGB around Sunbury would not be moved.
- the original promise of Melbourne 2030 that any UGB variation would be along the Growth Corridors and that the Green Wedges in between would be protected. Instead, the wedges have been flattened out. These changes – if approved – mean every part of the UGB is now uncertain.
- The need for certainty with regard to the UGB.

This is the most serious assault on Green Wedges since 2002, possibly since they were inaugurated in 1971. It brings into question the question of whether Government has any commitment to Melbourne 2030 or to protect green wedges. Our Coalition has loyally and consistently supported Melbourne 2030 and the State Government's record on green wedge protection since the Green Wedge Protection Policy was launched but we wonder whether there is any longer any point as no-one in this Government seems to have any continuing concern for green wedge protection.

The green wedges are, as successive premiers and planning ministers have said, 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.

3.2 It contravenes the recommendations of the State Government's Melbourne 2030 Audit Committee, which stated:

3.2.6 The Urban Growth Boundary

Retain and strengthen the Urban Growth Boundary, while ensuring that an appropriate supply of development land is maintained over time in Growth Areas.

This can be achieved through:

- *Maintaining the UGB without alteration for at least the next five years, unless compelling circumstances arise.*
- *Developing a clear and transparent process for future reviews of the UGB.*

As recently as June 2008, State Government and Planning Minister Madden accepted most of the Melbourne 2030 Audit recommendations, including the following:

"The Government will:

Maintain the UGB and consider the timing of future UGB changes on the basis of updated forecasts, the development capacity of existing urban areas, longer-term urban growth issues (including future economic and employment opportunities) and transport investment requirements."

It is clear to us that none of these conditions has been satisfied by either the [M@5mill](#) or the DMNSC reports.

Please find attached to a separate email as examples:

- the Minister's letter of 18/8/08 in which he stated there was no current need to review the UGB, and
- Sue Wilkinson's letter of 11/11/08 in which she makes a similar statement and restates the Government's commitment to the Melbourne 2030 Audit's recommendation for no review for at least 5 years.

3.3 The need for certainty

Fundamental to Melbourne 2030 and to Green Wedge protection was the need for certainty about the Urban Growth Boundary. This is recognised, ironically, in the DMNSC objective: *“Provide certainty to local communities, developers and other investors about future development in the growth area.” (DMNSC ,P 6)* Yet there is no sign that the report's authors have any idea that their report has just destroyed the certainty around the UGB that took years to establish.

In contrast to the adoption of the Melbourne 2030 metropolitan strategy in 2003, the proposal for further expansion and the areas for “investigation” have been selected arbitrarily and without any prior analysis, public consultation or policy underpinning.

The Urban Growth Boundary announced by State Government in 2002 was twice amended, in 2003 during the M2030 submissions process and in 2005 after the Smart Growth Committee process. In 2005, we had concerns about the process, for instance neither green wedge nor environment groups were represented on the Smart Growth Committees despite the Minister's undertaking that we would be. Hence it was only incidentally and in areas where our member groups had a close working relationship with Council environment officers that our member groups were able to contribute local knowledge to this process.

However, as there was at least a process based on some serious environmental assessment by DSE technical officers, the Green Wedges Coalition did not object to these UGB moves, apart from specific ill-judged destructive examples, such as

- the 2003 rezoning for industry of 1000 ha of Lyndhurst land shown by an extensive City of Greater Dandenong Land Capability Study to be highly suitable for agriculture, and
- the 2005 rezoning for residential development of flood prone land at Werribee on which one of our members had invested a large amount of time and money in establishing an olive grove on which he planned to spend his retirement.

In the 2008 proposal, there seems to have been no process beyond the drawing of straight lines on a map by some desk-bound bureaucrat before announcing vast “Investigation

Areas, ” which have undermined any certainty created by the establishment of a UGB, followed by the announcement of an only slightly smaller urban development area of 41,993 ha.

It is now likely that any land inside the investigation areas but outside any newly established UGB will be immediately rushed by speculators.

Clearly the State Government’s Green Wedge Protection Policy adopted in 2002 and implemented in 2003-4 through amendments to the Planning and Environment Act, the introduction of new Green Wedge and Rural Conservation Zone provisions (Clauses 34, 35 and 57) and of an Urban Growth Boundary have been very important in protecting green wedge land for farming.

The Green Wedge Protection Policy provisions introduced as an essential component of Melbourne 2030 had the potential to create the certainty needed by farmers and other land-holders in order for them to make long-term plans for the farming, conservation or other long-term use of their land.

This has to some extent been undermined by speculative purchases of green wedge land by large developers and land-holders anticipating windfall gains if they could persuade State Government to rezone their land. Again, had State Government held the line, such strategems would have ultimately been discouraged and the land retained for sustainable agriculture and other appropriate green wedge uses. Much of the land used productively in the Western Plains North Green Wedge is successfully farmed by share-farmers working land owned by developers.

Unfortunately, such speculators have been rewarded by State Government hand-overs of more green wedge land for development. At the time Melbourne 2030 was introduced, the Government announced initially that there was enough land within the Urban Growth Boundary to last until 2030. Had they taken appropriate measures – including minimum density controls – it probably would have done.

Instead, they have allowed developers to gobble up the land resource and modified their projections to state that there was only 15 years’ land supply within the UGB. In 2005, as culmination of the Smart Growth Committees’ work, State Government announced the hand-over of a further 11,500 ha of green wedge land in the growth corridors. Again, this was supposed to last until 2030. In mid-2008, the Melbourne 2030 Audit recommended that no further review of the UGB would be necessary for at least five years.

Coming on top of all this, the consequence of this latest green wedge land grab is to further undermine the certainty supposed to have been created by Melbourne 2030 and to push the price of land inside and even outside such investigation areas through market pressure with the prospect of rezoning for urban development.

This in turn increases the rates and pushes genuine farmers and conservation landholders off their land so that ultimately sustainable agriculture and other appropriate green wedge uses become less viable and our food security is accordingly diminished.

3.4 The need to contain outward growth (suburban sprawl) was a fundamental and very sound objective of Melbourne 2030. Instead of containing outward growth, State Government is pandering to it. These green wedge areas should not have been investigated until or unless circumstances make it necessary in at least 5 years' time (Melbourne 2030 Audit recommendation) or we say, to keep the government's 2005 undertaking, not until 2030. .

In 2002, there were 620,000 new dwellings forecast until 2030 (from 2001) - with only 195,000 of them in growth corridors and a goal to reduce Greenfield development from 38% in 2001 down to 22% by 2030.

The rate of population growth from 2001-2006 has been 4.1% in growth areas and only 0.9% in established areas. That ratio should have been in the order of 2.5%/2.5% to move towards the reduction of Greenfield development. This may have been because of

- the increase in more single person households compared with families in urban areas, compared with more young families going to growth corridors where housing is cheaper (a short-sighted choice, as they will pay far more in the long-term for their car-dependent transport costs.)
- an increase in sales to non-resident overseas nationals and companies purchasing houses for children and staff as a means to achieve immigration aspirations,
- failure by developers to construct higher density developments for which planning permits have been approved, eg Mitcham Towers and Doncaster Hill applications and a five storey apartment building adjacent to Westall Station approved without controversy by Kingston Council 4-5 years ago, which the developer, Austcorp, no longer wants to build.

Housing starts from 1991-1996 were 145,000, or just under 30,000 pa. Nothing has changed. The 600,000 dwellings over the next 20 years (presumably from 2006 - 2026) still average 30,000 pa. (We do not have figures for what has been built from 2001-2006 at a time of unprecedented housing boom round Australia.)

But now we need 600,000 and 47.3% of them are supposed to cater to the rate of demand in growth areas.

3.5 The extra land – 26,000 ha – proposed to be taken for this plan is not needed. The calculation of the amount of extra land needed for housing seems to be based on flawed assumptions and on the failure to consider adopting more rigorous minimum density measures, as an alternative to taking more land from the green wedges.

Please find attached analysis by the late Jenni Bundy of the Green Wedge Protection Group in Nillumbik, which clearly demonstrates that there is ample land in the existing growth corridors if rigorous urban density measures were applied.

Jenni's analysis demonstrates that the Melbourne @ 5 Million plan to expand the UGB to provide further green-field residential land from Green Wedges are based on incorrect and deeply flawed land supply estimates. These invalid figures are the basis upon which the Government has deemed it necessary to move the UGB.

Her analysis shows there is enough land within the current UGB to last until 2030.

The full lot yield analysis in the UDP 2007 Report (which is the basis for the land supply estimates) is based on projections of a reduced lot yield per hectare over time in existing growth areas, down to 8-10 in some areas.

These figures should be recalculated to yield a minimum of 15 dwellings per hectare (gross), with a target of 20 dwellings/ha from 2010. A yield of 15 lots per gross hectare would provide enough development land within the UGB to last for nearly 19 years. A density of 20 lots/ha would provide enough for 25 years.

This would make this latest green wedge land grab unnecessary and would keep new houses safely inside the UGB, instead of allowing them to sprawl over a fire-prone urban fringe.

In a belated attempt to make the Melbourne @ 5 Million and DMNSC plans look sustainable, the Minister has repeated his initial announcement in June of a voluntary 15 lot per hectare target for development in the proposed new Urban Growth Zones to be created by the expansion of the UGB. However this is quite inadequate because:

- as it is still a voluntary and not a mandatory target, developers are free to ignore it; and
- in a letter to the Green Wedges Coalition, the Minister stated that the Government's target was 15 lots per net hectare. This represents approximately 7-8 lots per gross hectare.

(See attached analysis by the late Jenni Bundy, who died on Black Saturday in the St Andrews fires.)

3.6. Affordable housing in a liveable city. Increasing the development density in existing urban growth areas would make housing more affordable for purchasers as well as the broader taxpaying community. We are aware of the DPCD report covered on Page 1 of The Age (17/7) that estimates the extra cost of the urban sprawl created by this plan to be \$40 billion more than it would cost to build the same number of dwellings in existing growth areas. Estimates cited in a submission to the Growth Areas Authority by the Metropolitan Transport Forum puts the extra cost of this proposed urban sprawl at \$102 billion.

It has been stated by Minister Madden in Parliament (and reported in the Sunday Age 11/10/2009) that the funds to be raised by the \$95,000/ha Growth Areas Infrastructure Contribution will cover only 15 per cent of total infrastructure costs.

Instead, the Government is prepared to hand the green wedge land that makes Melbourne a liveable city to developers for McMansions and suburban sprawl.

3.7 Putting more houses in bushfire-prone areas.

February's tragic bushfire losses are a reminder of the risks run by those who live on and beyond the urban fringe and, we hope a reminder to urban planners and to Government of

the peril in allowing untrammelled low density residential development on the urban fringes.

Karen Kissane, in a summary report on the proceedings of the Bushfire Royal Commission, correctly identified urban sprawl as one of the “fatal confluence of factors” that led to Black Saturday. (*Lessons still to learn, the Age, 4/7*)

How immeasurably stupid then, while the Bushfire Commission was still deliberating, for State Government to proceed with its plans to expand the Urban Growth Boundary as if nothing had happened, and to allow developers to build a further 284,000 houses on another 26,000 hectares of fire-prone grasslands and grassy woodlands in the green wedges that were until now the lungs of Melbourne?

If Government had implemented its Melbourne 2030 policy to increase development density within the existing UGB, there would be plenty of land in the existing growth corridors and no need to expand into fire-prone areas.

Home owners would be protected from fire and the forests and grasslands would be protected from developers bent on short-term profits. The fires we saw racing through new houses on suburban quarter-acre blocks at Whittlesea on Black Saturday demonstrate the danger and futility of allowing further suburban sprawl in the northern, western and Westernport green wedges.

On Black Saturday, as fires roared through Whittlesea, Kinglake and St Andrews, on the other side of the city, houses were under construction in the environmentally significant remnant Grey Box forest on Eynesbury Estate in the Western Plains Green Wedge, north of Werribee, apparently in breach of the 30m buffer required by the CFA. Eynesbury was the last green wedge development approved in 2002 the Bracks Government legislated to protect the green wedges.

The Eynesbury subdivision approval by the then State Planning Director, under delegation was the last residential development approved in the green wedge before the State Government green wedge protection package prohibited subdivision in 2002. It was the last straw that convinced the Bracks Government of the need for green wedge protection. Plans approved by a planning panel had the forest buffered by a golf course, but the developer wanted 800 more houses and in 2006 Melton Council and VCAT amended their plans to allow houses to edge into the forest, despite the evident bushfire risk. Department of Sustainability and Environment objections were over-ridden and environmentalist third parties were prevented from being heard by a Development Protection Overlay approved by the Planning Department. Please see attached photographs of houses under construction shortly before the February fires in environmentally significant grey-box woodland at Eynesbury.

What does seem to us to be clear is that fire risk will be minimised if State Government:

- requires rigorous minimum density standards for residential developments on greenfields sites and on substantial infill sites (eg on former industrial land) in

- existing urban and growth corridors where the amenity of existing residents is not adversely affected;
- initiates firm planning controls to discourage or prevent the building of more houses in areas of bushfire risk,
 - encourages prospective landholders who want cleared land to purchase cleared land and not to use bushfires as an excuse for wholesale clearing of private properties or public land.
 - reverses plans to extend the UGB into current green wedge areas of fire risk;

4. Environmental Impact of State Government's proposed changes to the UGB

To summarise the main environmental losses, the plans will expand the Urban Growth Boundary around proposed new growth areas and a freeway reservation which include:

- 6,900 ha of the State's best remaining western basalt plains grassland, whose biodiversity rivals Kakadu
- 924 ha of grassy woodlands in the Darebin, Jackson & Merri Creek valleys, with 400 year-old red gums
- prime market garden land in the Westernport Catchment;
- Southern Brown Bandicoot habitat near the Cranbourne Royal Botanic Gardens.
- Loss of habitat for other endangered species including Golden Sun Moth, Growling Grass Frog and Legless Lizard.

The 15,000 ha of grassland reserves to be provided over 10 years as a trade-off is of poorer quality than the kangaroo (*themeda*) grasslands to be destroyed . There are also concerns whether - as State Government has not in the past implemented its own clearing controls to protect grasslands - it can 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 in the 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. The Government plans to destroy 10% and to protect 20% in developer-funded reserves, exposing the hollowness of its Net Gain policy. This is an appalling way to protect an endangered vegetation community.

We are concerned that it is not clear which or whether any land designated in the plan as unsuitable for development will actually be protected for its nature conservation significance, heritage value or other values.

The removal of environmental protection from all areas within the UGB would seem to indicate that areas such as significant parts of the Merri Creek Catchment will not be protected from environmental damage or even clearing. This underlines our request for the Merri Creek Catchment to be returned to the green wedge.

Some of our members groups may have made submissions that deal with the environmental consequences in more depth. The following is a summary for the four specific areas of loss of green wedge land:

4.1 Western Plains Green Wedges:

Once known as brown wedges, the work of ecologists including Sarah Bekessy and Ascelin Gordon of RMIT has shown that the biodiversity of the western basalt plains grasslands rivals Kakadu. Native grasslands, Victoria's prairies, once stretched from Melbourne to Portland, but now only five per cent remains. They were ablaze with wildflowers in spring and supported many different species of marsupials and reptiles including Striped Legless Lizard and Fat-tailed Dunnart. The Werribee and Melton Plains support the largest remaining areas of Victoria's Basalt Plains Grasslands and are one of Australia's 15 Biodiversity Hotspots.

Grassland remnants are scattered across the plains, with the largest contiguous area extending westwards from Werribee nearly to the YouYangs, and a substantial block are also located on the eastern slopes of Mt Cotterell, much of which will be protected in planned reserves. However many of the higher quality remnants around the urban areas of Werribee, Laverton, Deer Park and Caroline Springs will be destroyed.



The proposed extensions to the western growth corridors will destroy over 6.900 ha of the environmentally significant grasslands. They will cut off and flatten the western green wedges in breach of the basic Melbourne 2030 principle that growth should be channelled along growth corridors and green wedges in between protected. It removes the environmentally valuable break in the growth corridor between Melton and the City.

(Pic, left, Western plains grasslands)

The Western Plains North Green Wedge Group is calling on State Government to protect environmentally significant grass-lands in reserves and to protect all remnant grasslands and fertile farmland by keeping it in the green wedge and by implementing stricter measures to protect remnant grasslands from illegal clearing.

4.2 Sunbury Maribyrnong Valley Green Wedge:

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

In a separate submission, which outlines the environmental values of the Jacksons Creek/Maribyrnong River valley and how they are threatened by the UGB move, Arnie Azaris details the environmental losses and also points out that substantial parts of the investigation area are covered by a Airports Overlay and that residential development there would probably lead to calls for an airport curfew.

4.3 Whittlesea Merri Creek Green Wedge

The Merri Creek is a crucial life-line for native flora and fauna, extending into the northern suburbs of Melbourne. Along its length lies a chain of state and nationally significant grasslands, two of which have been reserved at Craigieburn and Campbellfield, whilst others remained on private land in the green wedge until now. A further 35 per cent of the Merri Creek catchment has been included in the proposed urban growth area, hence development will threaten its priceless biodiversity, including several populations of endangered Growling Grass Frogs

The Friends of Merri Creek, like the Western Plains, Sunbury Maribyrnong Valley and Western Port Green Wedge groups report that profitable grazing activities can fit well with the conservation of grasslands and grassy woodlands. Many Landcare group members in the Merri Creek valley are aware that retaining native pastures and regenerating woodland trees improves their farm production values as well as biodiversity

Melbourne's northern plains, extending westwards from Plenty Valley to Merri Creek and Mt Ridley, contain fine examples of Victoria's endangered Red Gum Woodlands . This ecosystem once extended across much of the western plains, but now only a tiny percentage remains. The majestic Red Gum trees are often up to 400 years old or more, and form a park-like landscape over native grasses and herbs. They provide many hollows and important habitat for woodland birds such as the endangered Barking Owl and rare parrots and many species of bats. Grey Kangaroos loaf in their shadows during the day.

Important stands of Red Gum woodland habitat survive near Mt Ridley to the west of Craigieburn, in the Merri catchment, and scattered across the Whittlesea green wedge, extending into some of the new suburbs. Some traditional grazing properties have kept both their Red Gum trees and the native grass layer into the present day through generations of sensitive grazing practices.

The Friends of Merri Creek called on State Government to secure a Merri Creek Biodiversity Network to extend from the upper catchment south into Melbourne's northern suburbs. Some of the area sought for reserves including

- **nationally significant Bald Hill grasslands,**
- **the grassy woodlands south east of Donnybrook,**
- **a 400m habitat corridor along Merri Creek and**

- **all of the Craigieburn Grasslands and Mt Ridley grassy woodlands** have been identified as “significantly constrained land,” but with no explicit commitment to protection for conservation. A Boral Quarry is proposed for the constrained part of the Bald Hill Grasslands.
- The **Kalkallo West grasslands** and
- **Camoola Swamp biosite** are slated for development.

The proposed urban growth areas cut deeply into the Red Gum woodlands of the Whittlesea green wedge. This threatens centuries-old trees, with many hollows and fallen branches for fauna habitat, and patches of native grasses and wildflowers such as Milky Beauty Heads and the nationally endangered Matted Flax-lily. Suburban development will clear many of these woodlands, or retain the trees as isolated museum pieces in pocket parks and roundabouts – as seen already in new suburbs at South Morang and Epping North.

(Below: views of Mt Ridley Red-gum grassy woodlands)



4.4 South Eastern Investigation Area (WesternPort green wedge)

The proposed new south-eastern urban growth area was once part of the vast Kooweerup Swamp and has some of the most fertile agricultural land in the state and also provides endangered Growling Grass Frog habitat. This land is very important in supplying fresh vegetables to Melburnians. The heaths and woodlands of this landscape, including Cranbourne Botanic Gardens and remnants on private land, support the largest surviving population of Southern Brown Bandicoot near the City. The bandicoots seem to cope well with the existing level of disturbance of their habitat for market gardens and hobby farms. Cardinia Creek is a significant, fairly healthy creek with lots of opportunity for instance, platypus have been released into it by the Platypus Conservancy. They have been sighted at Beaconsfield and are likely to move further downstream if habitat is protected.

Environment and Landcare Groups wanted:

- **The Kooweerup Investigation Area** protected within the green wedge as an essential farming area close to Melbourne.
- Conservation agreements with private landholders to secure effective **bandicoot habitat links extending both south and east from Cranbourne Botanic Gardens.**

- **significant (>200m either side) riparian and drainage buffers** and links to other habitat and landscapes.

The proposed new urban growth areas, together with growth corridor land added in 2005, now threaten to remove large areas of prime farmland and to encircle Cranbourne Botanic Gardens with suburbs. They also threaten the health of Westernport Bay and its remaining seagrass. After the disastrous loss of seagrass in Westernport generally considered due to the construction of Cardinia Reservoir, engineers sought to protect the Westernport Catchment from further damage caused by urban

We would add our concern that the existing Urban Growth Boundary on the southern edge of the South-East Growth Corridor was sited on engineering advice on the ridge line bordering the Westernport Catchment to avoid more siltation damage to Westernport Bay. Unfortunately, someone lacking this history seems to have simply drawn straight lines to make a new boundary jutting far into the Westernport Catchment. This is likely to increase pressure on the health of the ecology of Westernport Bay.

Casey Council has opposed the extension of the Urban Growth Boundary in this area as its strategic planning supports the preservation of this highly productive farmland.

5. The impact on green wedge landholders of the proposed expansion of the UGB.

The homes, livelihoods and future of many hard-working farming, conservation and lifestyle families will be severely adversely affected.

5.1 An estimated 200 homes and family farms in the path of the OMR and E6 freeways and of the Donnybrook truck-rail interchange will be covered by Public Acquisition overlays. (This number may be reduced to some extent by recently announced changes to the route of the OMR and possible alternative routes to the E6 Freeway.) This PAO will be like a sword hanging over the heads of these families, probably for decades.

The knowledge that their properties may be acquired by State Government in 10 or 20 years time is likely to spoil the certainty and comfort of landowners and discourage them from improving their farming properties or from conserving remnant vegetation. The future of their communities is under threat, if this plan proceeds. Even if the freeway (or other infrastructure) is never built, the PAO will make people lose heart and interest in caring for their houses and land.

There is no point spending money when the land is to be taken from you at market value anyway. People will be driven out of the area in search of a place that might be more permanent. Although after the uncertainty created by this UGB move, people will have to move a long way from Melbourne to find anywhere they could be half-way confident would not fall victim to the next UGB move.

The PAO also restricts what landowners can build on their land and makes it impossible to sell to anyone other than State Government.

In response to a question from me about the OMR and proposed railway line at the Stakeholders Briefing on the proposed UGB changes in June, a bureaucrat said State Government had made no financial commitment to any of the proposed infrastructure projects. And a senior bureaucrat told one of our members that the Donnybrook terminal (actually planned for Beveridge) is more than 20 years away.

Transport experts looking at the likely effect of peak oil and the projected transition to a carbon-constrained economy have been predicting that the resulting move of commuters away from personal motor vehicles and into public transport, cycling and networked home offices will mean that no more freeways will be necessary.

Hence all this grief, social dislocation and environmental destruction caused by PAOs for freeways and infrastructure projects may be pointless in the end if they are never built.

For instance:

- A grazing property with some native grasslands and giant red gums along a 3 k Merri Creek frontage currently farmed by a committee member of Taxed Out will be affected by the proposed freeway while a substantial part of his land is designated as unsuitable for development because of biodiversity. He has been given no information about whether this land will be acquired by Government or whether would receive any payment for managing it for conservation. He is left with only 24 ha of developable land. As the property is adjacent to the proposed Donnybrook rail terminal and is surrounded by land owned by Delphin, it will not be practical to continue to farm there if the UGB expansion goes ahead.
- There is great concern among the citizens of Wollert & Woodside, who will have their homes and/or communities destroyed by the E6 Freeway. This freeway seems to us to be quite pointless as it is parallel to and so close to the Craigieburn Freeway. The Wollert residents are also solidly opposed to being included in the Urban Growth Boundary should the E6, serves as the Urban Growth Boundary as does the OMR for much of its length, be rerouted.

Wollert is a historic little town on the original boundary between the colonies of Victoria and New South Wales. It is situated in the outer northern suburbs of Melbourne and consists of open grassland filled with very old gum trees, many around 200 years and older, as does neighbouring Woodside, also destined to be concreted over for the freeway. The name Wollert is Aboriginal for "place of many possums" signifying its environmental importance.

The heritage buildings at the corner of Epping Road and Boundary Road date back to the 1870's when a post office and the Wayside Palais were the focal points of the district. Today these buildings are also in the path of the projected freeway.

Wollert residents say 56 of their homes would have been covered by the Public Acquisition Overlay for the freeway route announced in June. This number would be reduced by the two alternative routes announced recently, but the Wollert residents are still strongly opposed to a further 21 freeway that they see as unnecessary and detrimental to their properties.

Also razed will be the CFA station, around which the Wollert community is centred: the people of Wollert were out in force fighting the Black Saturday fires at neighbouring Whittlesea & Kinglake. On Black Saturday, Wollert was one of two brigades that got into Kinglake before the fire went through. One of the Wollert CFA volunteers was badly burnt & spent 10 days in hospital recovering.

When the announcement of the UGB move and proposed E6 became public, a Wollert resident told me it as “like another Black Saturday for Wollert. We cannot afford to lose any more houses”, she said.

5.2 Landholders including some of our members will be driven off their land by speculative pressures and rising rates if their land is brought within an expanded Urban Growth Boundary, for instance:

- One of our members has spent years carefully tending her several hectares of remnant grassland at Melton. Her land is now inside the proposed new UGB. While power lines over part of her grassland have been designated as unsuitable for development – and have entitled her to an exemption from the GAIC (should she be forced to sell) - to be surrounded by suburban sprawl will spoil the peaceful rural lifestyle and landscape she has enjoyed until now. She does not wish to sell, particularly since it will be impossible to replace the family home and grassland broadacres she loves.
- The Lamattina family has a number of family market gardens owned and farmed for a range of vegetables by family members in the South Eastern proposed urban growth near Cranbourne. In an interview with ABC Stateline program (Friday 19/6) Mr Frank Lamattina described them as Australia’s largest farming family. Mr Lamattina describe the land as “like gold” and irreplaceable and said his family did not want to move. His land would be bisected by the proposed UGB. This area is highly productive agricultural land watered by recycled water from the Eastern Treatment Plant. Casey Council has asked the Minister to leave at least 4000 ha of this land, including the Lamattina farms, in the green wedge because of its significance for food security.
- Other GWC members have attended meetings of the Taxed Out group and say that while the group as a whole is focussed on the GAIC, which they can all agree on, most of their members are also concerned about the prospect of being pushed off their land by various development pressures including:
 - being rated off their land: ie, when the price goes up tenfold as the Minister predicted at the launch, rates will also go up tenfold and for many people, this will be prohibitive;
 - being surrounded by suburban sprawl (even if they did try to hang onto their homes and land if/when the UGB move puts them into the Urban Growth Area.

For instance a Taxed Out meeting at Melton was attended by about 500 landholders all of whom wanted to stay on their land. Some are farming, others are conservation landholders or just ordinary citizens with a few acres on which to keep a horse to ride, show or race or ponies for the kids. They are aware they will never be able to get another few acres like this within reasonable distance from the city.

Following Minister Madden's challenge to Taxed Out protesters when he visited Melton in July to let him know if they did not want to be inside the UGB, a number of residents have written to let him know that this is how they feel.

A recent meeting of the Northern Taxed Out group members resolved unanimously to "take up Planning Minister Justin Madden's offer to have their properties removed from the Investigation Areas if the GAIC remains payable at the first sale or subdivision of the land."

5.3 Landowners in the proposed new grassland reserves are affected by similar uncertainties and concerns associated with the prospect of the application of Public Acquisition Overlays over their properties. State Government proposes to purchase the reserves with offset payments from developers who destroy significant remnant vegetation in the new Urban Growth areas.

We have concerns that some landholders are having their land forcibly expropriated. We submit discussions should be had with landholders: those willing to apply conservation covenants should be allowed to remain on their properties and should be provided with incentives in the form of Bush Tender and Grow West grants.

Recommendation: The Green Wedges Coalition proposes that the land identified for reserves needs to be properly protected in future, even if the expansion of the UGB does not go ahead. State Government needs to fund staffing and legal costs to prosecute illegal clearing wherever it happens. Failure to do so has led to the loss of many thousands of ha of grasslands in the green wedges.

We suggest that landowners who are willing to accept Trust for Nature covenants for the protection of native flora and fauna on their land should be allowed to retain their properties and to enter into agreements with Parks Victoria about whether they or Parks Vic should manage their land.

5.4 Developers who have been making speculative purchases of land in the green wedge, knowing that residential subdivision was prohibited, are overjoyed by State Government's backdown on its green wedge principles, embodied in legislation and planning provisions. They are believed to have been actively lobbying the State Government and Planning Minister for such an outcome.

Certainly a number of them were fulsomely supportive of the State Government decision in the attached Financial Review article the day after the Minister announced the proposed new UGB (*“Landbankers overjoyed to explore the boundary,” by Scott Elliott 18/6/09*). The article lists the following developers with large holdings in the area proposed to be rezoned for urban growth in consequence of the proposed UGB expansion: Dennis Family Corp, Villawood, Peet & Coy, Delphin, Mirvac and the Malaysian-backed Jayaland. A Villawood spokesman said the UGB expansion encompassed three land parcels owned by the company at Sunbury, Cranbourne and Epping. Dennis Family will benefit from two new stations to service their estates at Wyndham Vale and Tarneit.

Tony Delmenico of UDIA said the expansion would allow the State to retain its mantle as one of the most affordable greenfield markets (with lot prices less than two-thirds the value of Sydney).

Another developer, named in the press as successfully lobbying to have the OMR moved off its land is Evolve Development, part-owned by Ron Walker. (Developers’ ‘Lobby ‘shifted freeway’ 5/10) Two other companies, Hamton and Mondous, were named as joint proponents of the Stoneleigh 30,000 person housing estate on 2185 ha. of land at Caroline Springs. Sam Mondous is believed to have substantial holdings in the SE proposed urban growth area near Cranbourne. Some of his land in this area was rezoned in suspicious circumstances the last time the UGB was moved in 2005.

Ever since the Bracks Government’s Green Wedge Protection package of legislation and planning provisions in 2003, developers have been making speculative purchases of green wedge land. In the west, this land was being usefully share-farmed: had the Government held the line on the Urban Growth Boundary, the developers would eventually have re-sold to genuine farmers or conservationists.

Yet Ron Walker’s company Evolve was able to have the freeway shifted off their land, while the Government claimed publicly that the re-routing of the freeway was because non-existent studies showed the new proposed route past Mt Cotterill was less environmentally valuable.

For us, this demonstrated that the main reason for opening up 41,000 ha of green wedge land for development is to help land-banking developers, including Delphin, Villawood, Dennis, Mirvac, Peet, Mondeus and now Evolve. Just as many dwellings could be built and just as many jobs created in existing urban areas at a fraction of the infrastructure cost (estimated up to \$102 billion more for suburban sprawl).

I recall seeing a Government Minister (possibly the Premier) saying on television that all or most of the land encompassed by the proposed new UGB is owned by developers. Government spokesmen have seemed surprised that so much of it is owned by ordinary people, who want to stay in their homes and on their properties. They should not have been, as 3000 letters were sent to landholders after the announcement of investigation areas in December.

It is also a matter of concern that political party fundraising seems often to involve developers. The luncheon, hosted by Planning Minister Madden on 14 July to "brief" developers and business "on the vision for our growth areas and the need to fast track infrastructure investment to create jobs" for which they paid \$5000 a plate to raise funds for the ALP, conveyed the clear impression that developers can buy the Minister's ear at the expense of other citizens.

That lunch was organised by Phil Staindl, whose company Progressive Business raises funds for the ALP and lobbies on behalf of developers for to have land rezoned for development.

I do not personally know many developers, but at Minister Madden's famous fundraising lunch at the Rialto on 14 July this year, I did spot the principal of a planning consultancy that was involved in the only successful application for a residential housing development on green wedge land since 2002, on his way into the lunch. (This was John Woodman, of Watsons, which successfully steered the Wyndham Cove Marina Project through a planning panel and ministerial approval process to rezone green wedge land for residential development. The developer in this case was Perpetua, whose principal, Angus Reid, is now on the run from the authorities in Dubai, having left two colleagues to face jail there, after his company came unstuck in a Dubai development. The Wyndham Cove Marina development has not gone ahead, thus no doubt dashing the hopes of some Werribee residents who were persuaded to support it by promises of beachfront cafes at a new beachfront reand a new beachfront resort to be serviced by a ferry service to Melbourne. Watsons are also well-known for their Martha's Cove development on the Mornington Peninsula.

After Mr Woodman and Mr Reid presented to the Western Region Environment Centre Board which I attended on behalf of GWC, WREC coordinator Harry van Moorst and I were invited to lunch by Rob Gell, who was employed as a consultant for the project and who wanted to know what he would need to do to make this development acceptable. We told him the only thing that would make this development acceptable would be for it to go away, and we paid for our own lunches. This development would have very serious environmental risks, including the possibility that it might allow seawater to leach into the freshwater aquifer that largely waters the Werribee South Market Gardens and it was approved on condition that the environmental risks were suitably managed.

The Planning Minister at the time, Rob Hulls, did intervene to stop another development application by Watsons for a golf course housing estate at Keysborough, which he rightly pointed out was "housing development by stealth," a description we would also apply to Wyndham Cove.

Recommendation: While there have been numerous press reports over the years of developers land-banking in the Green Wedge, most people, including perhaps the Government, are not aware of how much land they own or of where it is.

In the interests of transparency, we recommend that a register of lobbyists be kept, together with a list of development applications which with they have been

associated, and that development applications should list the names of any lobbyists, landowners, developers or planning consultants as well as proponents, so that local councils and local communities know exactly who they are dealing with when an application is being considered.

We respectfully suggest it would assist this inquiry to have a listing of all the developer holdings in the proposed new Urban Growth (currently green wedge) Areas and showing where they are on the DMNSC map, along with the names of any developers, consultants, landowners and lobbyists involved.

6 The Impact of the proposed Growth Area Infrastructure contribution for land in designated growth areas.

There is almost universal concern among affected landholders, whether they wish to remain on their green wedge properties or to leave their properties and take advantage of windfall gains from rezoning, that the government proposal for a \$95,000 ha flat rate levy on all landholders upon the sale of their properties is most inequitable.

The Green Wedges Coalition supports the Taxed Out position that this infrastructure levy should be levied at the point of development approval.

We will leave points (a) and (c) to (f) to the experts in Taxed Out and comment simply that it is by no means clear what if any mechanisms are planned to ensure the contributions are directed only to the intended purposes. If this proposal goes ahead, we suggest stringent controls will be needed As it is unclear as to what this levy will be spent on.

A western suburbs paper has reported that funds raised from landholders at Rockbank would be at Rockbank given to Mirvac & Jayaland to provide roads for their development. When I rang the 1800 government information line to ask about this I was put onto a DPCD planner who informed me that the Government was still making up its mind about what the funds would be spent on.

As developers have traditionally paid for road construction on residential estates, it would be quite inappropriate for funds raised by levies to be used for this purpose.

Green Wedges Coalition queries why the development levy imposed on growth corridor land in 2005 has been abolished and why a less equitable levy on landholders has been introduced instead.

7. Allied issues:

7.1 Population: do we want a city of 5 million?

The 4 million target for the population of Melbourne was determined in 2003 after considerable debate, analysis and a State Government sponsored population summit, which took into consideration the sustainability of such a number in terms of its environmental impact and of the need to balance the projected growth with environmental protection measures. For this reason it had the support of the ACF.

The boosting of the 4 million population target to 5 million is highly controversial and seems to have been made on the basis of little more than demographic projections based on the recent economic boom-times which now seem to have ended, on the continuation of bargain basement prices for green-field sites and on a laissez faire immigration policy and

A number of environmental and community groups, including participants in a workshop convened by Andrew Booth in February 2009 and members of the Planning Backlash group have questioned whether such a target is sustainable or desirable. Dr Katherine Betts of Swinburne University has recently published a study which identified increasing public disquiet at the rate of population growth, particularly among trades and unskilled workers, even before the global financial crisis.

As a matter of due process, the State Government needs a new, representative population policy summit to debate this new 5 million target in the light of new research and thinking about sustainability issues including water and climate change and not just accept a laissez faire approach that is increasingly out of touch with public thinking and research.

If Government continues to deluge the market with cheap development land, with no constraints such as other countries have on its purchase by foreign owners, and an anyone comes approach to immigration policy, naturally we will have unrestrained growth. Whether that will be infinitely acceptable or sustainable is another question that needs to be seriously debated.

7.2 Need for an Independent Monitoring Authority

We are concerned that many of the flaws in this proposal arise from a process whereby matters normally dealt with by Local and State Planning Authorities have been handed to an unelected, unaccountable Growth Areas Authority that is concerned with promoting urban development in the green wedges to the detriment of virtually all of the Melbourne 2030 policies.

We submit that this needs at least to be counterbalanced by an ongoing monitoring authority to oversee the protection of green wedges and public lands. This proposal builds on our earlier submission to the Melbourne 2030 Audit for the establishment of a Green Wedges Authority, similar to the Growth Areas Authority, which does a good job of promoting and governing the process of development in the growth corridors.

We suggest that this idea be broadened into a Green Wedges and Public Lands Authority. This should cover existing Crown and other public lands in urban as well as green wedge areas and could also require the provision of open space in growth areas and urban areas currently under-provided.

It should have oversight over the performance of Councils, State and Commonwealth Government departments and instrumentalities and VCAT and should play a coordinating role between such agencies to ensure that more public lands do not fall between the cracks of public policy as the Laverton Grasslands and Moorabbin Public Golf Course have done.

7.3. The Regional Rail Link (west of Werribee to Deer Park)

The Green Wedges Coalition supports better public transport services, which are fundamental to sustainable planning, but we are concerned that this railway line – which is funded through the Victorian Transport Plan - is being used to justify expanding urban development into the green wedge.

In our view, if orbital railways are established, they should not become de facto transport corridors.

We are also concerned that the location of the stations seems – according to the attached Financial Review report - to be linked to speculative land banks acquired improperly in the green wedge by developers believed to have close contacts with the Planning Minister. We would argue that railway stations should be located to provide optimal benefits to the community and not the developer. And that such locations should not be within the green wedges.

7.4 The Outer Metropolitan Ring / E6 Transport Corridor;

The Green Wedges Coalition is strongly opposed to the construction of this proposed Freeway, which in view of the looming Peak Oil and carbon constraints, is unlikely to be needed.

We are sceptical about the likelihood of the railway line proposed for the OMR alignment ever being built. The pattern, for instance with Eastlink & the Eastern Freeway, seems to be that railway lines are promised as sweeteners for freeway projects in their initial planning stages, but are never constructed.

We are particularly opposed to the route of the E6 freeway through environmentally significant red gum grassy woodlands and heritage townships like Wollert (see S. 5.1.above). It seems to us to be quite pointless and unnecessary to build a second freeway parallel to and so close to the Craigieburn Freeway. Even if the OMR is ever built, this should be linked to the Craigieburn, not to a new freeway.

We understand from Wollert residents, that the E6 was planned before the Craigieburn freeway, and was in their view superseded by it.

7.5 Boundaries and management of areas for grassland reserves in Melbourne's west.

We naturally support the proposed new grassland reserve, but do not believe that they justify the proposed destruction of the 6,900 ha of the State's best remaining western basalt plains grassland or of the 924 ha of grassy woodlands in the Darebin, Jackson & Merri Creek catchments, with 400 year-old red gums, within the proposed new UGB.

We support the concerns and comments EV, VNPA and of western environment and grassland groups that the grasslands to be destroyed are in some cases of better quality and diversity than those proposed as offsets. We also support the more detailed environmental recommendations made by those groups.

The offset process proposed in the DMNSC plan, involving the destruction of some of the last and best *Themeda* grasslands in the state, is an appalling way to protect the largely *Danthonia* grasslands in the proposed reserves. It clearly does not provide a Net Gain.

It is well known that the value of reserves is increased if they are linked to other reserves. We submit that the two proposed western grassland reserves should ideally be linked to make one larger reserve or at least be linked by a 400 m wide conservation reserve corridor along the intervening river valley.

- **The Green Wedges Coalition respectfully recommends that this Committee:**
 - Advises the Legislative Council to not consider any of the legislation associated with the State Government's proposal to expand the UGB or to impose a GAIC until the Committee has reported on this inquiry.
 - Advises the State Government to
 - abandon its proposed relocation of the Urban Growth Boundary as unwise and unnecessary;
 - Restore the 2005 infrastructure levy on developers;
 - Amend the proposed new infrastructure levy to exempt landholders who sell their properties to conservation landholders or farmers and to make the levy payable only if/when the land is approved for development.
 - Provide funding and direction to ensure that the land identified for reserves needs to be properly protected in future, even if the expansion of the UGB does not go ahead.; that other environmentally significant remnant flora and fauna habitat also receive proper protection wherever it may be and that State Government needs to fund staffing and legal costs to prosecute illegal clearing wherever it happens.
 - Allow landowners who are willing to accept Trust for Nature covenants for the protection of native flora and fauna on their land should be allowed to retain their properties and to enter into agreements with Parks Victoria about whether they (with appropriate advice and funding support) or Parks Vic should manage their land.
 - Keep a register of lobbyists, together with a list of development applications with which they have been associated, and that development applications should list the names of any lobbyists, landowners, developers or planning consultants as

- well as proponents, so that local councils and local communities know exactly who they are dealing with when an application is being considered.
- Ensure that proper mechanisms are provided to ensure that development contributions are directed only to the intended purposes and are not given to developers to subsidise infrastructure costs they would normally have had to provide.
 - Conduct a population inquiry if it is considered necessary to reconsider the Melbourne 2030 target of 4 million and to take appropriate measures to ensure compliance with whatever target is determined to be sustainable.
- **We respectfully recommend it would assist this inquiry to draw up a listing of all the developer holdings in the proposed new Urban Growth (currently green wedge) Areas** and showing where they are on the DMNSC map, along with the names of any developers, consultants, landowners and lobbyists involved

Yours faithfully



Rosemary West
 Coordinator,
 Green Wedges Coalition
 (incorporated as the Green Wedges Guardians Alliance)

Attached to subsequent email:

1. *Green Wedges Charter (with a brief green wedge history and summary of current concerns.)*
2. *Green Wedges Coalition constituent membership contact list (for each green wedge).*
3. *Letter from Minister Madden to Green Wedges Coalition, 18/8/08.*
4. *Letter on behalf of Minister Madden to GWC member group 11/11/08*
5. *“Reasons why the UGB Expansion Plans are seriously flawed,” Analysis of land supply figures by Jenni Bundy of the Green Wedge Protection Group (Feb 2009)*
6. *photographs of houses now under construction in environmentally significant grey-box woodland at Eynesbury*
7. *“Landbankers overjoyed to explore the boundary,” by Scott Elliot, Financial Review 18/6/09*