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Outer Suburban/Interface Services and Development Committee
Inquiry into the Impact of the State Government's decision to change the Urban Growth
Boundary
Parliament of Victoria
Spring St
EAST MELBOURNE
VIC 3002

12 October 2009

Dear Committee Members,

Re: Submission to Regarding the Urban Growth Boundary

The Victorian National Parks Association is grateful of the opportunity to submit to this process. The VNPA submission relates to impact the State Government's decision to change the urban growth boundary has on the environment.

Due to time constraints we have provided our submission to the Strategic Impact Assessment Report, Environment Protection and Biodiversity Conservation Act, 1999 (June 2009) and also our briefing paper in response provided to the Federal government to the Program Report for 'Delivering Melbourne's Newest Sustainable Communities (August, 2009).

The briefing paper provides our current position and highlights key areas of interest on the basis of the State Government's response to submissions received for the Strategic Impact Assessment Report, June 2009. This builds upon key points that we raised within our submission to the Strategic Impact Assessment Report.

The briefing paper provides detail on five key areas where the Australia Government can significantly improve the proposed Melbourne Growth program, by applying strict approval conditions. These cover the need for:

- 1) Enforceable regional biodiversity conservation strategies
- 2) A clear and deliverable grassland reserve implementation plan
- 3) Prescriptions and rules for protection of high-value grassland areas
- 4) Commitment to and clarification of a northern grassy woodland reserve and prescriptions
- 5) Delivering real offsets.

Our submission relates to a number of concerns that we still hold around the implementation of the Strategic Impact Assessment process for Melbourne. Key areas of concern that are still relevant include:

1. A Rushed Process sets a poor precedent for Federal Assessment (refer to section 2.1.1 and 2.1.2)
2. New Reserves Plan needs clarity (updated in our Commonwealth Government brief, refer also to Section 2.3.0 and 3.6.2).

3. Better protection of high value sites needed within new growth areas (a summary is provided below and in detail within Section 3.0).
4. E6 Transport Corridor needs to be re-aligned (although the route is now proposed to be partially re-aligned, more should be done, refer to Section 3.6.1).
5. Limitations of the studies informing the Strategic Impact Assessment (addressed in Section 2.1.5, 2.1.6 and 2.1.7).
6. Inadequate Strategic Assessment Mitigation Strategy and Prescriptions to address EPBC Act requirements and the State Government Native Vegetation Framework (refer to section 2.2.0 and section 4.0).

Better Protection for high values sites within new growth areas

There are five growth areas, each of these have some high value grassland and biodiversity sites, which require better protection and recognition in the plan. Forty-two sites and key habitat links have been identified within the proposed urban growth areas which need protection.

Summary of key growth areas provided below:

- Whittlesea (Upper Merri) Growth Area. – At least nine (9) key areas have been identified as needing greater protection. There are no commitments for new reserves proposed in the north, which has a high dominance of Grassy woodland than the west. Underlying ecological information is poor and needs to be redone with targeted surveys over the coming spring. Up to 40-50 percent of high value remnant areas could be destroyed, based on criteria in the Impact Assessment Report.
- Melton-Caroline Springs growth areas – Seven (7) areas of conservation significance have been identified, including the Boral Quarry site, which need additional protection through inclusion in a Kororoit Creek Regional Park and realignment of the E6 transport corridor.
- Wyndham Growth Area – Seven (7) key areas have been identified including three high priority sites and three habitat links, as well as a realignment of E6 Transport corridor (Outer Metro ring road) to allow for the inclusion of high conservation significant sites to be avoided.
- Sunbury Growth Area – Twelve (12) significant areas have been identified including five high value sites, including a significant expansion of existing Holden Flora and Fauna Reserve and seven habitat links to allow species to move when pressured with urban development.
- South East Growth Area – Seven areas (7) including two key high conservation areas, and five habitat corridors have been identified as requiring recognition and protection to safeguard the endangered Southern Brown Bandicoot and vulnerable growling grass frogs.

Regards,



Megan Clinton
Acting Executive Director