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Submission to the Public Accounts and Estimates Committee Inquiry into Meeting our Obligations to Protect our Ramsar-listed areas.

My name is Rosemary West and I am making this submission in my role as a Kingston City Councillor and as Coordinator of the Green Wedges Coalition. I have been elected five times and am now in my 17th year on Kingston City Council. I previously worked as a journalist, at The Age newspaper for 15 years. Since my election to Council in 2003, I have taken a consistent interest in the Ramsar-listed Edithvale and Seaford Wetlands, which I consider to be the environmental jewel in the crown for our municipality and for the South East Green Wedge. I have supported and greatly admire the work of the Friends of Edithvale-Seaford Wetlands, and have generally attended their AGMs, for which I have chaired the election of office-bearers, and attended other special events as invited. I want to emphasise that neither they nor any other group has any responsibility for any part of this submission, though I have cited their submissions to other inquiries. Nor do my views represent the views of Kingston Council, though Council did accept my motion to engage expert witnesses for the Edithvale LXRA trench EES and officer recommendations to engage expert witnesses for the Mordialloc Freeway EES.

I have also coordinated the Green Wedges Coalition since its formation in 2002. Seaford Wetlands are in the South Eastern Green Wedge, but the Edithvale Wetlands are not. At the time the Urban Growth Boundary was introduced in 2003-4, I advocated for Edithvale as well as the Seaford Wetlands to be included in the Green Wedge, but was told the former was not possible because Edithvale Wetlands are now surrounded by residential development. e

The Green Wedges Coalition listed the Mordialloc freeway as the single most serious threat to any of Melbourne's Green Wedges in last year's annual report and Diana Donohue submitted on behalf of the Defenders of the South east Green Wedge. It will bisect the Green Wedge, diminish the market gardens and nurseries that provide the fundamental agricultural purpose for the green wedge as well as impacting the environmental and open space values. The Minister's Assessment gives considerable weight to the freeway's impact on the environmental values of the Green Wedge *"Native vegetation, whether remnant or restored, in an urban landscape, is a rare asset. For much of its length the project traverses or borders the South East Green Wedge, in which the Victorian and local governments have invested significantly. The conservation of biodiversity in the green wedges close to developed areas is an important aspect of this. In contrast to the IAC and in the context of the project's location relative to the green wedge, I*

consider clearing 12Ha of native vegetation to be significant, warranting very careful examination to ensure that the loss has been minimised to the extent practicable and mitigated to an acceptable level. (P.18). But not significant enough to stop it. Frsnkston

I would like to begin by acknowledging and thanking FESWI pioneers such as Barry Ross and Les Williams, along with Scott Seymour, when Melbourne Water manager for this area, for their lead roles in securing the Ramsar-listing, and the FESWI members and Melbourne Water staffers who have carried the torch since.

Alan Hunt, the Local Government Minister responsible for Green Wedges in the Hamer Government once asked me: did we make a mistake by permitting Chelsea Heights to be built? At the time, I said that our – ie the Green Wedges Coalition’s – policy was to work with what we have left and not to try to unpick past decisions.

I noted subsequently that it was the development of Chelsea Heights that prevented Edithvale Wetlands from being included in the Green Wedge, though the Seaford Wetland is. When the UGB was introduced in 2003, we asked for Edithvale, but were told it couldn’t be in the Green Wedge because it was surrounded by housing.

When I sat and watched the panel proceedings for the First Avenue housing development on the edge of the Edithvale Wetlands, and heard the FESWI submission presented by the Nicholas Croggon for the Environmental Defenders Office (EDO), I realized Mr Hunt was right to have doubts and I welcome this Parliamentary Committee enquiry as an opportunity to review the errors of the past with a view to reducing the risk of such mistakes happening again.

The problem has been that every authority with responsibility for protecting these Ramsar-listed Wetlands – from Chelsea Council, Kingston and Frankston Councils to VCAT and the authorities responsible for infrastructure projects such as the LXP and the MRPV, Melbourne Water and of course the State Government and Federal Governments has been too ready to compromise with most of the development or infrastructure projects that have come our way, even when they clearly are not being undertaken in a manner to minimize their environmental impact, when less risky options were available, and even when they are fairly pointless as projects.

Miraculously, or perhaps more as a result of a fair bit of luck and a fair bit of good management, the Wetlands have survived and the birds are still coming.

I have not had time to read the VAGO report, but I understand it is fairly complimentary towards Melbourne Water, as no doubt most submissions will be. I am confident that Melbourne Water has generally done a very good job of managing these wetlands, at least inside the Ramsar boundaries, and I don’t want to sound critical. But if we don’t learn from our mistakes, we are as they say condemned to repeat them. We cannot be sure the bird-friendly

habitat of these wetlands will survive too many more mistakes like those I am going to cite. And if we do not take more care of these wetlands in future, and if the habitat deteriorates to the point where the critical bird species stay away or become locally extinct, they could lose their Ramsar listing.

Most – though not all of these mistakes have impacted on (or will impact) on the Ramsar listed wetlands indirectly, through their impact on wetlands and other areas beyond the boundaries and on flyways used by the rare and endangered birds that are attracted to the Edithvale and Seaford Wetlands mostly by the relatively pristine ephemeral wetland at Edithvale.

Hence I will not be addressing the first dot point of the Committee's criteria, and my comments mostly related to dot points 2 and 3.

1. **The first serious challenge I recall, after the development of Chelsea Heights in the 1970s and/or 1980s, was the housing development at Austin Road Seaford**, which was approved by VCAT in 2004, well within the 60m buffer zone set by the Ramsar Management Plan. Melbourne Water said 10m would be enough.) Please find attached Barry Ross's excellent submission to that tribunal, which I commend to the Committee as the most comprehensive history of the Edithvale-Seaford Wetlands that I have read, and which includes the salutary identification of some of the management mistakes of previous years, and is an excellent read.
2. **It is worth noting a near-miss, in the form of a development application for residential development on Downs Farm**, adjacent to Seaford Wetlands in 2002. I recall accompanying Mr Ross to a meeting with the Minister's Advisor in town to talk about it. The advisor told us that the developer had asked the Minister to rezone Downs Farm to permit them to proceed with a residential development on the site, but that the Minister had told them to run the idea past the local environmentalists, and hence they came to Barry. I recall being part of a group of local environmentalists and Green Wedge supporters who took part in a round-table with the developer's representatives and basically told them to go away. (Please see attached a media release from Mr Ross, on behalf of FESWI, in September 2002.)

In 1993, Melbourne Water had provided Frankston Council with the funds to purchase Downs Farm, and after more than a decade's delay Frankston Council purchased the land which is now known as Downs Estate and is unfortunately the subject of a tussle between environmentalists and other Friends who want to use it for growing food. I gather Melbourne Water is supporting the use of this land for environmental purposes only; I commend their efforts and hope they prevail.

3. **When the planning application for Melbourne Water's Discovery Centre came to Council in 2008**, I was concerned as I was aware that the proposed location was on the

other side of Edithvale road from the original proposal for a low-profile building on the less sensitive Edithvale North Wetlands. I was also concerned because Melbourne Water at about the same time had closed the Edithvale bird hide because of structural unsoundness. They were refusing to pay for repairs to the bird hide and were apparently intending the new building to be a replacement. At my request, Council engaged an expert consultant Simon Mustoe to assess the plans for any impact on the bird habitat. He identified concerns and recommended a more comprehensive environmental assessment, but Council simply sent the letter to Melbourne Water CEO Rob Skinner and no more was heard of it.

The building required the removal of remnants of a wetland EVC, and it had to be raised on pylons to minimise the excavation of Acid Sulphate Soils, but still some was dug up. There was a facility for managing Acid Sulphate Soils in one of the Kingston non-putrescible landfills nearby, but Melbourne Water apparently chose to remediate their ASS on-site. I spotted the characteristic black soil, streaked with white lime, which I recognized from a tour for Councillors of the Delta facility. I asked Council's planning General Manager about this and expressed concern about whether the ASS would be blown into the wetlands by the north winds in the approaching summer. He said he was more concerned about flooding, and the pile of remediating soil was still there when the record floods of 2011 inundated the wetlands and surrounds. When the floods receded, it had presumably been washed into the wetlands leaving there no sign of it. Another lucky escape from a risk that could and probably should have been avoided.

Council had provided an estimate of \$300,000 to repair the building's foundations, but FESWI got lucky when Alison Kuitert rang Rotary seeking funding support, and local builder Brian Lowe picked up the phone and agreed to do the job for \$30,000. This they raised from their local MPs.

4. **The 25-lot residential development approved for rezoning from Urban floodway Zone (UFZ) at First Ave, Chelsea Heights in 2013** involved another planner identified in the current IBAC proceedings, Megan Schutz, representing the landowners. Nick Croggon of the EDO presented a strong case on behalf of FESWI against rezoning the 4.7 ha of Urban Floodway Zone for residential development (attached) and neighbours and other community groups also objected, but Council supported the planning panel's approval recommendation. I recall Graham Daff, on behalf of Melbourne Water, saying that probably Chelsea Heights should not have been developed, but as it had been, another 25 lots would not make much difference.
5. **The State Government has given the go-ahead to the trench construction (rail under road) for the Edithvale level crossing removal**, despite the considerable uncertainties documented by the Inquiry and Advisory Committee(IAC) appointed by the Minister for Planning to consider submissions to the Environmental Effects Statement (EES) last year.

(Please find attached critique by Kingston Residents Association based on extracts from the IAC report outlining some if not all of these uncertainties.)

A GHD report released by the State Government shortly after the decision had been made to proceed with the trench for Edithvale and Bonbeach crossings warned that the trenches would serve as a dam wall across the groundwater that naturally flows from the direction of the wetlands to the sea, and that this could cause a mounding of the groundwater that might threaten the wetlands with permanent inundation, and conversely threaten the foreshore with permanent drought. On behalf of FESWI, their vice president Robin Clarey wisely commented to The Age that *“the Andrews government should have waited until the full impact of digging the rail trenches was known before making its decision to go with rail under road”*.

“The wetlands just have so much importance for huge numbers of birds that come in here,” Ms Clarey said.

“Ms Clarey said she shared the widespread local disapproval of elevating the rail line over the road, but not if it meant damaging the wetlands.” (See attached Age report)

As a consequence of the identified threats to the Edithvale Wetlands, the Minister requested the EES, which led to elaborate efforts to develop mitigation and monitoring devices to satisfy concerns about the risks to the wetlands and to allow the project to proceed. I attended much of the IAC hearing of submissions to this and the Mordialloc Freeway EES's and found them salutary but disturbing learning experiences. I have heard a critique of some recent infrastructure EES processes by a PhD student who concluded that they were more in the nature of rubber stamps to demonstrate that process had been followed before allowing projects to proceed, and certainly that is the way these EES outcomes looked to me.

While the IAC deserves credit for identifying the many uncertainties, it seemed to me that the nature and extent of the uncertainties identified should have justified a recommendation to resolve the uncertainties before ministerial approval of the project, instead of merely requiring them to be resolved before works begin, with no clear indication of who would be responsible for ensuring that they were satisfactorily resolved.

The most significant and disturbing uncertainty concerned the failure of the EES to demonstrate an effective method of moving the mounded groundwater from one side of the trench to the other. If not fully mitigated, this could cause inundation of the Edithvale wetlands and of many of the 11,000 houses built on the former Carrum Carrum swamp in Kingston, and corresponding drought for the foreshore.

The EES recommendation of a horizontal pipe was found to be *“unproven”* (IAC report Page 21), and the IAC recommended that this uncertainty must be resolved before work

could begin. When I was last able to question LXP officers about this at a Council briefing a couple of months ago, I was told it had still not been resolved, and when it is resolved, the resolution will be provided to the State Planning Minister who had approved the project and to the Federal Environment Minister who provided EPBC approval. The EES claimed that the inundation caused by the trench would not extend as far as the Edithvale Wetlands, but the uncertainties about the groundwater measurements and modelling identified in Scott Seymour's submission for FESWI (attached) and noted in the IAC report indicate that these should not be relied on.

LXP has now reduced the depth of the trench to 3 – 6 m (a half trench) but has not provided evidence that this will solve the problem.

- Melbourne Water has "filled" a wetland that was part of the former Carrum Carrum Swamp across Thompsons Road from the Eastern Treatment Plant(ETP) to use for a solar panel 'farm.'** Frankston Council approved this filling exercise as "earthworks" without advertising the application and not even Councillors were informed. (*pers. comm from Cr Quin McCormack, Frankston councillor, on 28/11/2019.*)

Until recently, this was habitat for the birds that visit the Edithvale Wetlands and the ETP and it was part of the area on which Birdlife Australia relied for their regular bird counts. (See the personal communication below from Susan Telfer's submission on behalf of FESWI to the IAC for the Mordialloc Freeway EES - attached).

By way of context, as Ms Telfer said in her submission for FESWI, "*it is important to understand that Edithvale and Seaford Wetlands although not adjoining are linked, as are the wetlands in the project area, as integral parts of a network, which has been labelled by Birdlife Australia as the Carrum Wetlands Important Bird Area (IBA).*"

Ms Telfer cited the expert witness report by Richard Loyn for Kingston Council, who provided a map of this IBA, which extends from the wetlands across the road from the ETP at Carrum Downs, to the Braeside Park and Woodlands Wetlands. He said the Waterways Wetlands through which the freeway will pass should be added to this IBA.

As Ms Telfer submitted: "*There is a synergy at work within this complex array of sites across the former Carrum Lowlands all supporting marvellous biodiversity and rich habitat over which a multitude of bird species range seeking favorable feeding conditions, eg the Sandpipers will seek receding shallow mud flats, which provide abundant invertebrates, for which Edithvale is famous, while Snipe prefers the longer grasses at the edges.*

"When conditions are right these areas provide a haven for thriving bird populations. Of primary significance for these wetlands are the migratory waders that fly in from as far as northern Europe, Alaska and Japan annually to escape their winter, eg the Sharp-

tailed Sandpiper which amazingly makes a journey of 12,000 km from Siberia each year, and importantly the threatened Australasian Bittern."

Ms Telfer cited a personal communication from FESWI bird expert Alison Kuitert which I will quote in its entirety:

"The summer of 2018/19 was an amazing year for Sharp-tailed Sandpipers with Edithvale and surrounds hosting more than 3,000 'sharpies' for a short time, this being about 5% of the world population.... we owe it to the rest of the world to keep these sharpies safe and well fed whilst they are here. The 'sharpies' were spread between the Eastern Treatment Plant, Edithvale and Seaford Wetlands and possibly Braeside Park and the bird counters were keeping track of them on a weekly basis. The birds fed at Seaford up until early January and then moved into the more natural ponds at the ETP and Edithvale wetlands ... the ponds at the ETP dried up very quickly and the birds moved to Edithvale until the water and food ran out there there is the probability they then moved to Braeside where the wetland was drying out a more slowly.

*"Although these birds and others that feed and breed at the wetlands can move around we are rapidly running out of "other places" for them to go, for instance **a small, but very productive Melbourne Water wetland on the corner of Thompson and Rossiter Roads has just been filled in to make way for a solar farm. The report for this project made mention of the fact that the Bitterns don't nest there, but failed to recognise that the birds have to feed somewhere in order to breed. Another great little wet grassland area the Snipe used to feed in on Learmonth Road, in the Kingston Green Wedge, is now the Pony Club's cross country paddock and is mown regularly.** (local bird expert Alison Kuitert, pers comm. My emphasis)*

7. **The loss of the " wet grassland area the Snipe used to feed in on Learmonth Road, in the Kingston Green Wedge,(that) is now the Pony Club's cross country paddock and is mown regularly"** described in Alison Kuitert's personal communication to Susan Telfer (above) is another encroachment into the effectiveness of the broader wetland system that seems to have been an unwitting, unintended consequence. As I recall, the proposal to mow the pony club's paddock came to Council without any ecological assessment or any indication that it had any environmental significance at all.
8. **The State Government approved construction of the Mordialloc Freeway in June** last year, despite the IAC's failure to endorse it without strong qualifications. In its report the IAC stated that *"...planned upgrades to Centre Dandenong, South and Governor Roads presented in Transport Victoria's submission should be integrated with the project as the project would not deliver its objectives in their absence."* However, the Minister said these roads could not be endorsed as they were not investigated in the EES. The local Monash, Glen Eira and Kingston Councils also expressed concern that this freeway would attract more traffic into the Kingston

municipality and would add to congestion of roads including Centre Dandenong, South and Governor Roads.

Council took a non-partisan but concerned position on the freeway and engaged some good expert witnesses, eg Richard Loyn and Christopher Smit who was critical of the EES failure to test the groundwater for the whole project area. Richard Loyn's statement is at: https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/2415/5045/7219/Richard_Loyn_Mordialloc_Bypass_waterbirds_and_other_fauna_ESS_review_v3.pdf
Other expert witness statements are at: <https://engage.vic.gov.au/mordialloc-bypass-ees-inquiry>

However the main concern for this Inquiry is about the impact on the birds of the Edithvale Wetlands of construction of the freeway on what until now has been a flyway for the birds between the various wetlands of the Carrum Wetlands IBA. Susan Telfer in her FESWI submission emphasized: *"The continuing threat of habitat loss and cumulative effects of predicted disturbance from the initial freeway construction, the physical barrier of the raised embankment and acoustic wall, traffic including large commercial vehicles moving at high speeds, the footprint of the project robbing natural habitat, continual traffic noise drowning out bird calls, and the light and air pollution caused by the increased traffic must surely diminish what has largely been a nature reserve until now.*

"Maintaining and extending ecological connectivity across the project area and surrounds ... is important for the long term viability of some species and may also aid the adaptation of others to climate change where previous habitat conditions are altered unfavorably. Governments should take every opportunity to aid protection, management and restoration of ecosystems.

Ms Telfer said that *"FESWI have a concern about the disruption the proposed freeway will cause to connectivity over the extent of this wetland cluster due to resulting restricted flyways of certain bird species, eg, the magnificent Australasian Bittern, which has been observed moving frequently from wetland to wetland. A six lane freeway will no doubt deter birds from moving through this corridor to a considerable extent. Birds described as lumbering in their habit and not agile in flight eg crakes, swans and bitterns will be vulnerable to speeding trucks and other high motor vehicles even with a high and solid fauna barrier as is proposed. The freeway plan acknowledges that bird mortalities will occur and no amount of mitigation can totally avoid injury and mortality rates of these vulnerable, and in some cases, highly endangered species. There are no less than 13 migratory birds recorded (including the Latham's Snipe, Sandpiper Curlew) in the 11 report (see EES Chap 10, conclusion),*

“Large areas of undisturbed wetlands are important for the Australian Bittern’s survival. The cumulative effects of disturbance by this project will also diminish this environment for all resident native fauna.

“It should be noted that the numbers of these birds are decreasing around the world and that the Edithvale-Seaford Wetlands....are vital if this decline is to be arrested. It is estimated that only one quarter of the world's known population of Latham's Snipe remains and the numbers of Australasian Bittern is down... The fact is, this freeway plan acknowledges that bird mortalities will occur (EES Report- Ch 10-39) and that endangered species will be at risk”

The Minister’s Assessment found that the numbers of Australasian Bitterns have declined nationally from 2,500 in 2000 to under 1000 in 2011. He said it was likely that the Australasian Bittern could become extinct in the Edithvale Wetlands, having declined from 14 to 12, and with recent counts below 10. Mr Loyn said that while it might not matter if a few birds of more abundant species ended up as roadkill, it would be more serious for the survival of the Australasian Bittern.

As Ms Telfer said, “the IAC hearing was principally been about ascertaining, and where possible minimising detrimental effects of this project. It has also been looking at juggling competing interests of road users, residents, factory owners, workers and visitors to the area who have differing needs and concerns and of course the ecology . This has exposed some real challenges. The MRPV are seeking to avoid damage and appease all by this process, yet for every solution a new problem arises.

“Many of our birds move around at night and light pollution either during or post construction could be a problem as the route the birds would take when moving between Edithvale/Seaford and Braeside would be right along the path of the road. Sharp-tailed Sandpipers, Swamp hens, Coots, Swans, Rails and Crakes move between wetlands during the night as well as daylight hours.

“Groundwater modelling is complex and experts to this inquiry haven't agreed on the adequacy of baseline data obtained nor provision for an overall ground water audit and clear regime of ground water monitoring into the future along and beyond the freeway alignment. This is of concern as any unintended mobilisation of leachates from landfill, gases or other toxins caused by the construction method of driven piles has the potential for polluting the water table and so risking the wetlands hydrology.

“We strongly believe that this open space which includes the beautiful and tranquil Braeside Park with its own wetlands, should be preserved, enhanced and promoted, not spoiled.”

- 9. A new threat to the wider Carrum Wetland IBA has emerged, in the form of a recommendation by the State Treasury's Invest Assist group to relocate the Alex Fraser concrete crusher to a Melbourne Water site in Carrum Downs**, presumably across Thompsons Road on part of the wetlands near the solar panel farm.

Apparently with Melbourne Water's agreement. The recommendation was included among letters of support provided by the Alex Fraser Group in support of their application to extend their planning permit in Kingston's Green Wedge A Zone, where this use is now prohibited. It will need careful scrutiny.

Conclusion:

The Green Wedges Coalition listed this freeway as the single most serious threat to any of Melbourne's Green Wedges in last year's annual report. It will bisect the Kingston Green Wedge, diminish the market gardens and nurseries that provide the fundamental agricultural purpose for the green wedge as well as impacting the environmental and open space values. The Minister's Assessment gives some weight to the freeway's impact on the environmental values of the Green Wedge *"Native vegetation, whether remnant or restored, in an urban landscape, is a rare asset. For much of its length the project traverses or borders the South East Green Wedge, in which the Victorian and local governments have invested significantly. The conservation of biodiversity in the green wedges close to developed areas is an important aspect of this. In contrast to the IAC and in the context of the project's location relative to the green wedge, I consider clearing 12Ha of native vegetation to be significant, warranting very careful examination to ensure that the loss has been minimised to the extent practicable and mitigated to an acceptable level. (P.18).*

So who is there to defend the wetlands? I have heard of no Ramsar Committee oversight into any of the above encroachments on the wetlands. Melbourne Water is in charge, but as far as we know no-one inside or outside Melbourne Water has suggested that there was any problem with filling the Thompsons Road wetland or with the proposal to fill more wetland to accommodate the Alex Fraser concrete crusher, which is no longer welcome in Kingston's Green Wedge. Perhaps they don't know about the Carrum Wetlands KBA, as we didn't until we heard about it from Mr Loyn. The Friends and Birdlife Australia need to be careful to stay onside with Melbourne Water.

But if State Government wants to push through infrastructure projects that pose risks to the wetlands, Melbourne Water will not stand up to them. Regarding the two recent EES inquiries relating to development likely to impact on the Edithvale Wetlands, it is worth noting that neither IAC report provided unconditional endorsement for these projects, and that both have serious residual concerns, but no-one can say no to the State Government. Apart from the

hapless residents who will endure the health impacts of the air pollution generated by the freeway on their back fences, or by the “waterlogging” of their gardens,

1. The measure of developments around the Edithvale-Seaford Wetlands should be that if it is likely to impact on these wetlands or the endangered migratory and local bird species that inhabit or visit the wetlands, it should not go ahead or it should be amended to eliminate the risk.
2. To protect the core Edithvale and Seaford Wetlands also requires an upgrading of protection for the surrounding wetlands and buffer areas and not just the wetlands within the current Ramsar boundaries. Ramsar-style protection needs to be extended to the whole of the Birdlife Australia designated Carrum Wetlands IBA, and Birdlife Australia may need to broaden the IBA to include more of the remnant wetlands of the original Carrum Carrum Swamp.
3. The precautionary principle should be adopted and made mandatory for dealing with development applications that threaten to encroach on all of these wetlands. Perhaps this committee could help with that.
4. Perhaps also with funding. It would be dreadful to think that Melbourne Water is draining its wetlands for solar panels and concrete crushers because needs the cash.

Most of these projects are done and dusted, and it is probably too late to stop the Edithvale and Chelsea trenches or the Mordialloc Freeway. But I hope that by listing these threats, it may be possible to work towards more systematic protection from any future threats that emerge.

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Attached:

- Barry Ross, submission to VCAT for FESWI re the Austin Road, Seaford housing development. 2004
- Barry Ross, media release re Downs Farm on behalf of FESWI, September 2002.
- Nicholas Croggon, FESWI submission to the First Avenue planning panel, September 2013.
- critique by Kingston Residents Association based on extracts from the IAC report outlining uncertainties.
- The Age, Adam Carey, *rail trench could damage wetlands*, March 2017.
- Scott Seymour submission for FESWI to the IAC for the Edithvale trench, 2018
- Susan Telfer, FESWI submission to the IAC for the Mordialloc Freeway EES, 2019