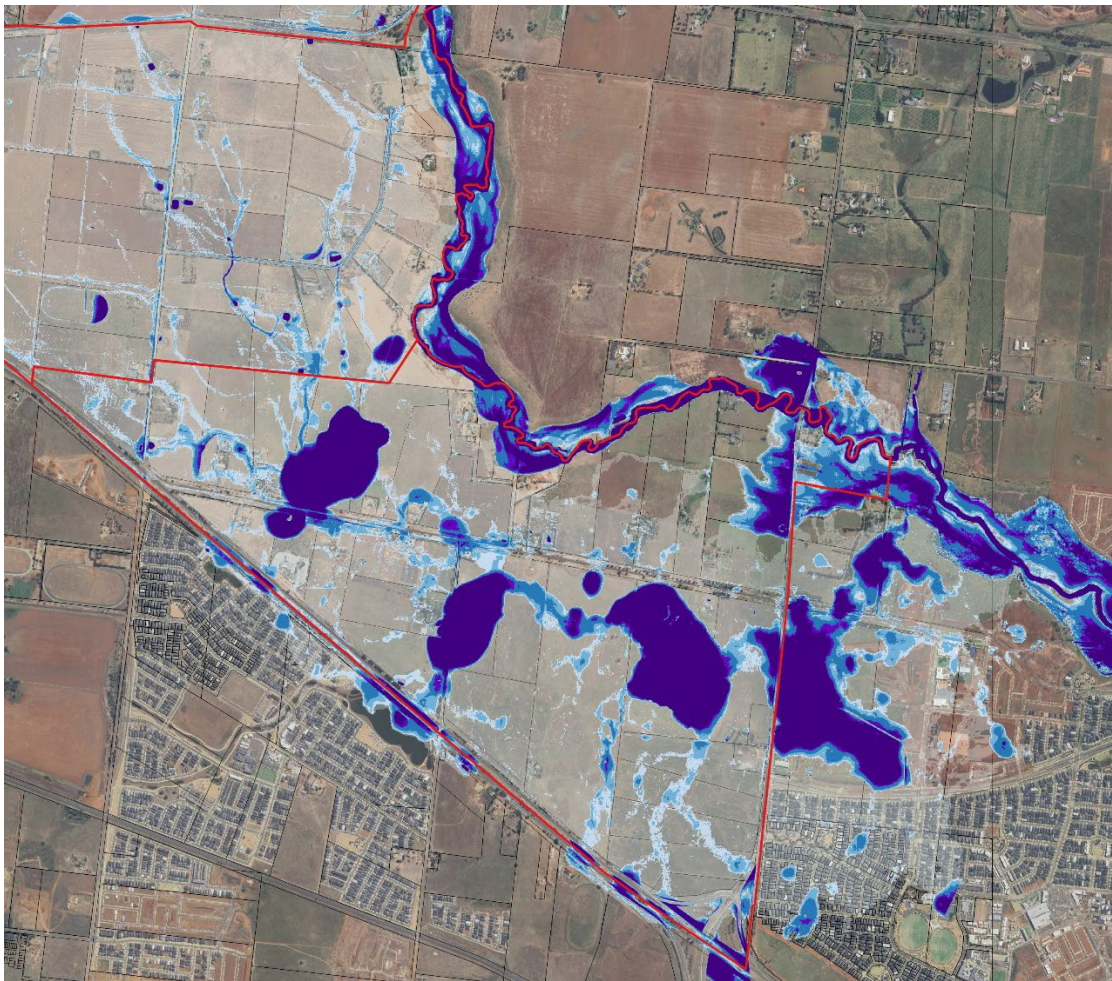


A glorious place: Grassy Plains Network and VNPA response to Melton East PSP



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1. Executive summary

1.1. Who we are

The Victorian National Parks Association (VNPA) is one of Victoria's leading nature conservation organisations. It is an independent, non-profit, membership-based group, which for 70 years has existed to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

The Grassy Plains Network represents land management professionals, academics, ecologists and community members concerned about the ongoing decline of grassy ecosystems across Melbourne and its surrounds. We advocate for improved grassland protection and management. We are part of the VNPA.

1.2. Key points

- We commend VPA on a draft PSP that genuinely listens to the needs of the environment.
- It is vital that the protections given to the three major wetlands be maintained in the face of inevitable developer greed. In particular, the 50 metre buffer from high water should be retained. The low depressions that are the three major wetlands harbour remarkable ecological systems that respond almost miraculously to flooding events.
- It is very important to protect the likely very significant Aboriginal cultural heritage present around Kororoit Creek and its escarpments, and the wetland systems.
- Particular attention should be given to protecting the intangible cultural values expressed through engagement with the Wurundjeri.
- We welcome the presence of areas of increased density, but note it is important that the efforts are made to reduce the impacts of such residential form on the considerable ecological assets throughout the PSP. Overshadowing is of major concern, as is visual intrusion (especially along Kororoit Creek). This is true of all urban built form.
- More attention needs to be given to the interfaces with the MSA Conservation Area (Conservation Area 15) and other ecologically important drainage assets. For instance, overshadowing, lightspill, noise, fencing, road crossings to minimise vehicle–fauna interactions need to be addressed.
- These interface design matters need to be fully costed and built-in to forward planning.
- In general, there needs to be detail around how to safely encourage potential amphibian, reptile and small mammal movement.
- Paynes Road Wetland meets the criteria for Seasonal Herbaceous Wetland. Mapping that says otherwise is flawed.
- In design and construction, bridge crossing structures need to minimise impacts on the Creek ecology. They should minimise overshadowing.

- It seems clear from documentation that Woodlands Reserve is a Groundwater Dependent Ecosystem. Treated flows from the Melton East PSP should be able to be directed into Woodlands as a low-flow top-up.
- The mapping showing where native vegetation can be removed should be amended to show that the wetland drainage assets are protected.
- Integrated Water Management (IWM) solutions need to be at PSP scale. We need a recycled water system such as Aurora has. We need some department or organisation to take active responsibility for this. At the moment the fallback on PSP guidelines and suggestions of options means that IWM will be mostly ignored by developers because of the failure to act of a group of well-meaning but risk-adverse governance institutions.
- The high presence of sodic soils across the PSP means that the PSP should include clear requirements about the construction phase of the PSP's development. Those requirements should set enforceable standards, require genuine oversight, and come with strong compliance provisions.
- In several instances, native vegetation overlaps with future public open space, or potential greenspace within schools. Wherever possible, efforts should be made to retain, improve, and make a feature of that native vegetation. To this end, DEECA can provide recently developed high-resolution mapping of C3 and C4 grassland across the PSP that could then guide such efforts. It would also allow the tweaking of local public open space to better intersect with likely native grassland. Once such overlaps are specified, on-ground survey should confirm the values present and guide park design.

1.3. Discussion

1.3.1. A glorious place

It is worth highlighting at the outset the outstanding quality of the natural landscape we are seeking to protect. This would have been a floodplain teeming with animal life, vast flocks of birds coming to the ephemeral wetlands, richly meadowed grasslands, the creek lines with ancient redgums and Bulloke.

1.3.2. First Nations

The conversations captured in the Aboriginal Cultural Heritage Assessment make it clear how very important this Country was and is to the Wurundjeri. The intangible aspects of Country run deep.

1.3.3. A strong draft

VPA are to be congratulated on preparing what we consider to be a new benchmark in precinct planning. The inclusion of the Wurundjeri early and comprehensively in the process, and the protection of the floodplain values, form the basis for an excellent outcome. Early consultation with the VNPA also appears to have been considered and in part adopted.

1.3.4. The wetlands

It is vital that the extent, biodiversity, heritage and connection of the wetlands be maintained against the inevitable developer disappointment at a low net developable area. In particular, the 50 metre buffer from high water should be retained.

The wetland complex is a Nationally Significant example of Seasonal Herbaceous Wetlands, Lignum Swamp, and damp Grassland. Their edges are rich with cultural heritage. Nature-based solutions are the best means of providing a sustainable long-term development solution. Short-term developer greed should not trump the future livability of this PSP.

It seems clear from documentation that Woodlands Reserve is a Groundwater Dependent Ecosystem. Treated flows from the Melton East PSP should be able to be directed into Woodlands as a low-flow top-up.

1.3.5. Interfaces with conservation areas

The draft PSP needs to include more requirements focused on protecting and strengthening the wetlands and waterways from the adjacent development. In particular:

- **Road interfaces** need to consider fauna movement. In places this means including under-road crossing structures; in other places it will mean preventing movement through fencing.
- **Bridge crossings** must be designed to minimise construction impacts, overshadowing and noise. We understand the reasoning behind the selection of crossing points and appreciate efforts made to minimise impacts to trees and proposed Growling Grass Frog wetlands.
- **Lightspill** is only discussed in terms of the Conservation Area. This needs to be extended to include all areas with conservation value. Consider light frequency and options for timing and movement activation, as well as ground-based lighting.
- **Overshadowing** needs to be regulated, especially since areas of increased density are being deliberately co-located with areas of high biodiversity. We welcome increased residential density, but not at the expense of the environment.
- Consider if **street trees** will impact conservation areas, either through overshadowing or groundwater consumption. Choice of species will be very important.
- Impacts of **sound** need to be minimised for fauna not just humans. High noise levels have well-documented impacts on fauna. Clause 58.04-3 (Noise impact objectives) of the planning scheme is probably not appropriate for fauna in a conservation area. Soundwalls should be considered where arterial roads interface areas of conservation significance. Traffic calming should also be in place on lower volume roads, and reducing speed limits should be considered. Road surface choice is also important.

Importantly, provision of crossing structures, appropriate fencing and other measures needs to be fully costed and required or else these measures will be cut from later design stages.

1.3.6. Design of drainage assets

Drainage assets need to function as habitat. Melbourne Water has its guidelines around use of appropriate EVCs, but it would be worth strengthening those by inclusion within the PSP of requirements of ensure quality habitat for the native species calling these conservation assets home.

1.3.7. Integrated Water Management

Integrated Water Management (IWM) solutions need to be at PSP scale and need to be driven by a single responsible authority. At the moment we have a poor situation where fallback PSP guidelines and options mean that IWM will be mostly ignored by developers.

The PSP should have water harvesting and a recycled water system such as Aurora has.

1.3.8. Sodic soils

The high presence of sodic soils across the PSP means that the PSP should include clear requirements about the construction phase of the PSP's development. This is where the real damage is going to occur. Generally, there is far too little oversight, with Council ticking off sediment traps etc, while the on-ground works include considerable movement and stockpiling of soils with disregard to the impacts.

The PSP's requirements in these matters should set enforceable standards, require genuine oversight, and come with strong compliance provisions.

The wetland assets in this PSP are particularly vulnerable to increased sedimentation. The PSP must ensure they are genuinely protected. They need to be written in such a way that we can prevent backsliding from a poorly resourced Council and a cohort of profit-driven developers.

1.3.9. An opportunity: Remnant native vegetation and Public Open Space

In several instances, native vegetation overlaps with future public open space, or potential greenspace within schools.

Wherever possible, efforts should be made to retain, improve, and make a feature of that native vegetation in such instances.

Despite a lack of reliable on-ground survey work ever being done for this PSP, we can get a good idea of where native grassland is present through recently developed high-resolution mapping of grassland across the Victorian Volcanic Plain. DEECA have access to this data, which was developed by ARI and paid for by Glenelg Hopkin CMA.

Using that data, it is possible to clearly identify probable locations where public open space will intersect with native vegetation.

It would also allow the tweaking of the location of local public open space to better intersect with likely native good- to high-quality grassland.

Once such overlaps are specified, rapid on-ground survey would be able to quickly and cheaply verify those intersections.

Park design can then embrace and protect these important and Critically Endangered grasslands.

1.3.10. Trees

The arboricultural assessment is thorough.

VPA should make genuine efforts to locate local parks in such a way as to protect high-value trees.

We support the implementation of *AS4970-2009 Protection of trees on development sites* on all indigenous remnant trees within the site. The loss of any remnant trees as part of this development should be avoided.

Robust fencing or barriers must be in place to protect the TPZ of preserved trees for the duration of any works in their vicinity. The TPZ must not be used for any activity during any works. This must include all works including demolition works.

For any trees retained it will be essential to design the sites and provide adequate space to ensure their Structural Root Zones and 90% of their Tree Protection Zones are adequately protected as stipulated by *AS4970-2009 Protection of trees on development sites*. In all stages of development all native indigenous trees should not be damaged or have any access allowed to their Tree Protection Zones. This is completely avoidable with a development such as this.

Retained remnant trees should be included in wildlife corridors. These should be no smaller than 50 meters wide with an additional 50 meter buffer from development sites to be maintained as a fire break via mowing. This will minimise native vegetation loss to fire break creation and will reduce the risk associated with trees.

Usable habitat corridors should be created and maintained to retained trees to allow local wildlife to use them and to remain ecologically functional.