

31 March 2025



Mat Garner
Director, South East Metropolitan Melbourne
Victorian Planning Authority

Dear Mr Garner,

RE: Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan and Draft Amendment C295case to the Casey Planning Scheme

Royal Botanic Gardens Victoria (RBGV) appreciates the opportunity to provide comment and after reviewing the current draft available online offer the following:

RBGV is deeply concerned about the significant loss of vegetation in the proposed development areas of the Devon Meadows and Casey Fields South Precinct Structure Plans (PSPs), particularly the mature, high-value trees and habitat critical for the Southern Brown Bandicoot (SBB).

The proposed parks and open space allocations do not adequately align with and protect areas of retained vegetation, leaving much of it within the private realm, risking its removal and/or gradual degradation over time.

Furthermore, the current open space allotments seem to disregard the guidance provided in the biodiversity report regarding identified high-quality SBB habitat, resulting in minimal remnant vegetation being retained.

Many of the trees identified for retention in these areas of high-quality remnant habitat coincide with areas earmarked for Melbourne Water (MW) works and are likely to be severely impacted by construction activities, particularly in relation to drainage infrastructure.

The proposed locations for drainage assets, including MW retarding basins and constructed waterways, would likely result in adverse effects on these retained trees. According to the wording in Plan 13, *"Trees identified as 'To be retained' on Plan 13 Native Vegetation Retention & Removal must be retained, and provision for their ongoing maintenance, unless it can be demonstrated that: (e) removal of the trees is necessary to provide for the functional and operational needs of infrastructure, including drainage, community infrastructure, and the road network"* this provision appears to allow for such impacts.

It is therefore critical that these assets be relocated away from sensitive areas, which unfortunately are *not* able to meet the desired outcome of both habitat retention as well as drainage infrastructure.

Additionally, there appears to be no consideration of tree health in relation to groundwater interactions, which could be problematic in areas with potential sand dune formations.

The proposed high-density development along waterway corridors, which are also designated as SBB habitat corridors connecting the Royal Botanic Gardens Cranbourne (RBGC) to areas outside the Urban Growth Boundary (UGB), is also of significant concern. This outcome seems unsuitable, and a more sensitive approach to the interface between development and these vital corridors is needed to support both the ecological integrity of these areas.

Furthermore, these proposed SBB corridors and culverts under roads also do not seem to adequately address the connectivity needed between Botanic Ridge and the edge of the Urban Growth Boundary, which is crucial for the long-term survival of the species.

In summary, **Royal Botanic Gardens Victoria** aims to highlight the overall lack of provisions for the regional survival of threatened species, such as the Southern Brown Bandicoot, in the current format of the precinct structure plan. This approach compounds the ongoing contraction of habitat availability within this high-priority area and its associated corridor network that connects to nearby populations.

Thank you for considering these concerns. We hope to continue to work collaboratively to ensure that environmental values are given the necessary attention in these important planning decisions.

Yours sincerely



Manager Environmental Systems