



Grassy Plains Network

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Section G Grasslands

Proposed Planning Scheme Amendment C222BRIM to the Brimbank Planning Scheme – Development Victoria Proposal in Cairnlea

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1 The Grassy Plains Network

The Grassy Plains Network is an independent organisation representing 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.

Many of our members and supporters are acknowledged experts in the management and restoration of grassy ecosystems. Many have led long-term efforts to preserve grasslands across the Victorian Volcanic Plain. Some have been crucial to the establishment of the native seed industry, others to the development of best-practice monitoring methods for grasslands. We have members and supporters who have been working for decades with community to raise awareness of the importance of grassland conservation. Collectively, we have worked at every level of government, across all of Melbourne's north and west, and across much of Victoria, in Landcare, CMAs and in dozens of community and environmental organisations.

2 The Victorian National Parks Association

The Victorian National Parks Association (VNPA) has been at the forefront of nature conservation campaigns for 70 years. It is one of Victoria's leading nature conservation organisations. It is an independent, non-profit, membership-based group, which exists to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures. Its activities include strategic campaigns, education programs and developing policies, through to hands-on conservation work, as well as programs to promote the care and enjoyment of Victoria's natural heritage.

3 Summary

Cairnlea is a well-design urban development with substantial areas of protected and critically endangered native grassland. We consider Development Victoria's proposal to clear the unprotected grasslands on Section G to be a poor planning response because:

- It is unnecessary
- It fails to meet avoid and minimise criteria for the removal of native vegetation
- It fails to properly consider the significance of the grasslands and the larger issue of ecological connectivity in the landscape
- It fails to meet obligations under the revised FFG Act, notably duty of care
- It profits from the deliberate mismanagement of the grasslands present
- It needlessly kills critically endangered Striped Legless Lizard population rather than salvaging and translocating them
- The road layout promotes loss of native vegetation
- It represents a lost opportunity to achieve urban design outcomes that benefit both the environment and the community.

4 Landscape values and Cairnlea

Cairnlea is generally considered to be a great success in terms of urban development. Its master planning was exemplary and ahead of its time. Preserving existing tree lines, its water management, road form, and its retention of native grasslands all contribute to a community with a real sense of place and history. The current proposal from Development Victoria is surprisingly poor, especially given its disregard for natural values in particular.

5 Critically endangered grassland

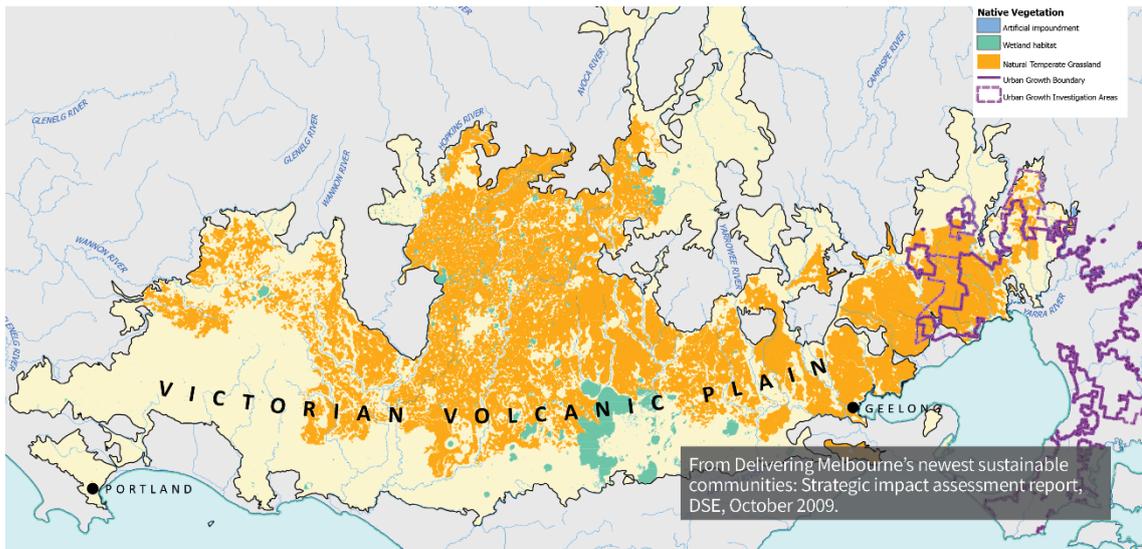


Figure 1: Extent of native grassland pre-1775.

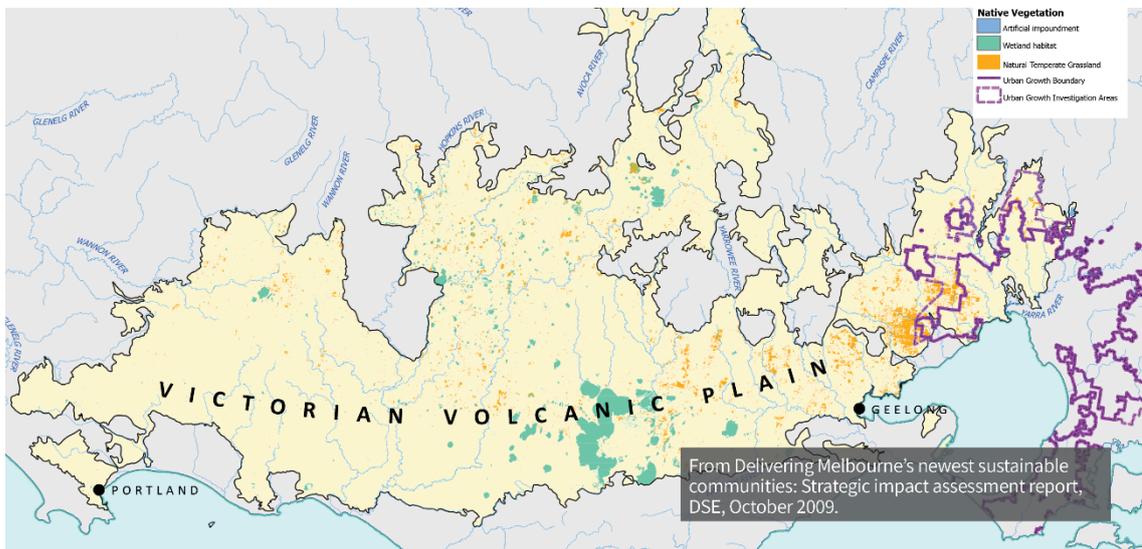


Figure 2: Extent of native grassland in 2009. Note only large remaining patches close to urban growth boundary.

The grasslands of the Victorian Volcanic Plain have been described as Australia's most endangered ecosystem. The Natural Temperate Grassland of the Victorian Volcanic Plain ecological community is classified as Critically Endangered under the Federal EPBC Act, and Plains Grassland as threatened under Victoria's Fauna and Fauna Guarantee Act.

Not only is this ecological community in grave danger of extinction, but across Victoria many individual species are threatened because of its loss. Plants such as Spiny Rice-flower (*Pimelea spinescens*), Matted Flax Lily (*Dianella amoena*), and fauna such as the Growling Grass Frog (*Litoria raniformis*), Striped Legless Lizard (*Delma impar*) and the remarkable Plains Wanderer (*Pedionomus torquatus*) are all critically endangered.

Grassland once extended across the Victorian Volcanic Plain all the way from the Yarra River to the South Australian border (Figure 1). Sadly, less than 2% of that original extent remains (Figure 2). Surprisingly, and unintuitively, Melbourne and the areas immediate around it, contains much of the last grassland remaining in Victoria. This occurred because, historically, large tracts of western Melbourne were purchased by early land speculators, then largely set aside for property development rather serious agricultural intensification. As a result of this accidental history, these grasslands are amongst some of the most important for conservation of the ecosystem which is considered amongst Australia's rarest.

Consequently, urbanisation is one of the biggest threats to the remaining grasslands we have. In Victoria, grasslands are undergoing death by a thousand cuts. The single hectare at Cairnlea may not seem much, but it is another loss in a process that shows no signs of stopping.

Simply put, we just have too little grassland left to be clearing it.

As a further historical note, the unique grasslands community of the Gippsland Plains is already extinct. The extinction of the grasslands of the Victorian Volcanic Plain is a genuine possibility.

6 Ecological values on-site

The presence of the keystone species Kangaroo Grass on site indicates that the grassland present is of good quality. In many grasslands, grazing has meant the loss of this important and defining species. The rocky substrate of the site is also intact, which is also not the case for many of the remaining grassland sites in Victoria. The embedded rock indicates that no cropping has occurred (it is unploughed) and provides substantial habitat for many species, including the Striped Legless Lizard known to be on site, as well as other species.

To give a practical measure of the significance of these Section G grassland patches, they are better than most of the grassland found in the proposed Western Grassland Reserves.

7 Ecological significance of Section G

Big is not always better when it comes to grasslands, and it is a myth that large patches are inherently better than small patches. Small grasslands can be of high quality and can be improved through good management. It is the history of the site that is most important. When stock grazing has been light or intermittent, and when the rocky substrate is intact, and when fertiliser has not been introduced, the conditions are right for a grassland that can be readily improved – the Section G tick all of these.

The site is weedy, but that is to be expected given its history. Some weeds present (e.g. Onion Grass) are intractable, but most can be managed through strategic fire and spraying regimes. Good management can reverse the effects of weediness.

The plains grassland at Cairnlea Section G is missing some of the native herbs you would expect to find in a fully intact remnant grassland. But it has good ecological structure, namely it has a

good cover of Kangaroo Grass. Kangaroo Grass is a keystone species that underpins the productivity and food webs of good-quality grassland, so Section G only needs good management and restoration actions tackle these problems, improve habitat, and enhance outcomes for a range of grassland-dependent flora and fauna species.

Some species will find the site is too small to support them. But for many species, a one hectare site is easily sufficient, and they can live their whole lifecycle in that patch of grassland. Appropriate management should be able to maintain their habitat. Importantly, rocky areas (embedded volcanic rocks, as well as surface rocks – a feature of many VVP plains grasslands) remain intact as habitat; de-rocked areas have far less habitat value.

The structure of the larger landscapes affects ecological function. When native vegetation cover is low, it is the connectivity of that vegetation that becomes more important for conservation and restoration. In Melbourne’s West, where so little native grassland remains, further loss of remnant grassland, e.g. Section G, compromises what remains. The stepping stones across the landscape, for creatures such as pollinators, become too far apart to work. This isolates populations, leans to reduced gene flow, and compromises the long-term viability of these species, meaning that local extinction will occur. At Section G, there is an opportunity to buffer such impacts through good planning and the preserving of grassland.



Figure 3: Location of Section G grasslands and significant nearby natural assets.

Section G is an integral part of the Jones Creek habitat corridor, which connects the large and popular grasslands of Iramoo Wildflower Reserve, Howardson Circuit Grassland, VU Grassland and Pimelea Wildflower Reserve to Jonesfield Corner, Section G grasslands and Reid Street Grassland, and then further to the east to the large, high-quality patch of Denton Avenue Grassland and the immensely significant St Albans Railway Reserves (Figure 3). The native grasslands at Section G exist within a broader, connected landscape that includes wetlands, creeklines and other grasslands, as well as the urban vegetation of the streets and yards.

Clearing the native vegetation in Section G will reduce options for landscape-wide conservation. Overall, the long-term “viability” of the other remnants in Cairnlea and nearby

will decline. Isolated native grasslands have less buffering capacity and resilience to environmental change relative to more connected native grasslands.

When considering the landscape-wide conservation of native grasslands in Victoria, all remnant patches must be considered of high importance, regardless of scores across various metrics.

Clearing native grasslands is counter all the evidence and arguments for maintaining this endangered ecosystem. It is always best to conservation species and ecosystems in situ.

8 Failure to avoid and minimise clearing of native vegetation

Development Victoria is being lazy with their urban design, and greedy in seeking to maximise their development footprint. It is far from impossible to develop Section G without causing the loss of native vegetation. Laziness and profit are not appropriate reasons to undermine the intent of Victoria's Guidelines for the Removal, Destruction or Lopping of Native Vegetation to 'avoid' and 'minimise' loss of habitat.

Small remnant patches of plains grassland habitat should, by default, be highly valued more than they currently are because their continued loss will almost certainly lead to local and, in some cases, global extinctions. It must be recognised that this extends beyond just "significant species" – those listed under Commonwealth or State legislation. Small intact patches of vegetation in areas otherwise largely cleared of vegetation tend to support the last individuals of species that have been eliminated from other parts of the landscape.

9 Responsibility under the FFG Act

The 2020 revisions to the Flora and Fauna Guarantee Act are intended, according to the Minister's Second Reading Speech, to 'modernise and strengthen' the Act. That includes expanding duties on public authorities – which include Development Victoria, as well as the Government Land Standing Advisory Committee – to give 'proper consideration' to the Act's objectives, the Biodiversity Strategy and instruments such as critical habitat determinations and flora and fauna management plans.



Figure 4: Some of the sixty grassland species listed as threatened under the FFG Act..

Those revisions include the new form of mandatory obligation to afford ‘proper consideration’ to various biodiversity matters under section 4B, which is intended to ‘elevate biodiversity considerations to form part of the administration of government’.

The making of various conservation devices, including critical habitat determinations, habitat conservation orders, management plans or public authority management agreements, are subject to the Secretary’s discretion (the Secretary ‘may’ undertake these actions).

The making of critical habitat agreements, once critical habitat is determined under the Act, is an action the Secretary must take ‘all reasonable steps’ to implement.

10 Profiting from deliberate mismanagement

Development Victoria has a duty to manage weeds of national significance. It has failed to exercise this duty. The site contains Artichoke Thistle, Paterson's Curse, Fennel, African Box-thorn, Chilean Needle-grass, Serrated Tussock, Soursob and Sweet Briar, all of which are noxious weeds as declared under the Catchment and Land Protection Act.

This failure to manage weeds is a common strategy of landowners who seek to, in effect, clear native vegetation by stealth. It is usually accompanied by a failure to manage the biomass of the site, also the case at Section G. Not only does the landowner save money by avoiding any active management costs, but the slow deterioration of the site from weed invasion and the smothering effect of biomass build-up reduces biodiversity and hence save on offset costs.

While it is the case that private landowners do not have to manage biomass on their properties, that is not the case for government authorities, which carry a duty of care under the FFG Act. Development Victoria has ignored that legislation, and community expectations, and its actions are reprehensible. Development Victoria is deliberately profiting from promoting biodiversity loss.

11 Salvage of Striped Legless Lizard easily achievable

The proposal to allow the destruction of critically endangered Striped Legless Lizard is completely gratuitous. Even if their habitat is to be cleared, it is entirely possible to translocate these creatures. That Development Victoria is proposing not to do this is another example of their disregard for the environment and the preservation of natural values. Crushing protected species under a bulldozer is hardly appropriate given Development Victoria’s duty of care under the FFG Act, and flies in the face of community concern. Again, this is laziness and profit speaking, not the level of urban design and ecological consideration we expect from the State of Victoria.

Despite the Department of Environment, Land, Water and Planning apparently no longer approving the salvage and translocation of Striped Legless Lizards, we believe it is a matter that must be reviewed given its clear conflict with the FFG Act.

12 Poorly considered road location

The 'boulevard' that is proposed to run through the southern patch of grassland at Section G is ill-considered. Alternatives exist. Providing access to the future development of the Jonesfield Corner site is predicated on the assumption that there will be no retention of the natural values on Jonesfield Corner, of which there are considerable. Moreover, provision of that road will in practice encourage the removal of native vegetation at Jonesfield Corner.

Minimal access is required to manage the native vegetation present, and that access can be via a road that does not remove native vegetation.

There are many alternatives for establishing useful pedestrian access to Jones Creek.

Again, Development Victoria is being lazy in its urban design considerations.

13 Opportunity for more thoughtful development

The grassland patches at Section G are small. It is not hard to imagine a number of scenarios that can successfully incorporate and integrate them into an urban design solution that protects remnant vegetation and provides substantial community benefit. Doing so will benefit the larger landscape and contribute to the viability of important remnant vegetation nearby.

Retention of the Section G grasslands gives the local residents the opportunity to have unique, wild, nature at their doorstep, delivering substantial ecosystem services, including well-documented human health and wellbeing benefits.