

Department of Environment, Land, Water & Planning
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23 July 2020

Dear Sir/Madam,

Re: The Strategic Extractive Resource Areas (SERA) pilot project in South Gippsland.

Context

I am writing as an individual who has been a resident of the Western Port ward of Bass Coast Shire for nearly twenty years. My particular concern is the part of the pilot project which involves actual and proposed sites on the eastern shores of Western Port. Some of these encroach on land currently part of the Holden Proving Ground. As you will know, that site is for sale and there is a strong community alliance, supported by the Bass Coast Shire Council, working to preserve the site. It is a unique tract of coastal forest which has been protected from encroachment for the past sixty years and is irreplaceable. It provides habitat for many species of flora and wildlife, some of which are endangered. There is potential for the site to form part of a wildlife corridor and to link with other remnant landscapes as part of a larger nature reserve. Allowing sand-mining on even a part of this site would be environmental vandalism in the extreme.

In the 19th century, the treed hills of South Gippsland were felled and the wood shipped across Western Port to build Melbourne. In the 20th century, the sea grass meadows of Western Port were harvested almost to extinction and also shipped to Melbourne to be used for insulation, I believe. There have been sand and gravel quarries in this region for many years and there remain many leases which were granted a long time ago and have not yet been exploited. Where these are in areas of relatively low environmental value eg cleared land which can be rehabilitated post extraction, there would be little objection. However, I do think that it is past time to stop stripping this area of its non-renewable resources.

Since colonisation, about a hundred of Australia's unique flora and fauna species have become extinct. According to ecologist, Professor Hugh Possingham, populations of threatened species are declining at the rate of 1% a year. Development and agriculture are among the major causes of habitat loss and, according to the CSIRO, habitat loss from land clearing is a primary driver of biodiversity loss in Australia. The current legislative framework, including the Environment Protection and Biodiversity Conservation Act, has not been successful in preventing further losses. As a nation, we must work cooperatively to prevent further destruction of eco-systems, remnant landscapes and habitats. We must find ways to balance competing priorities which give the environment at least as much weight as other factors.

Overview

In the Overview document it states:

'The project will trial the establishment of SERAs that will define the locations of strategic state resources while *considering* other existing land uses, environmental assets and community interests.' (my emphasis).

I interpret that to mean that the project will give equal weight to each of those factors and will be trying to balance the needs of each where they might be in competition. In reality, the project

appears to elevate the importance of extractive resources at the expense of the natural environment and other key planning considerations.

The Overview also states,

‘The Victorian Government is committed to helping secure access to critical materials to build our future homes and infrastructure affordably.’

Demand for quarry materials is expected to continue rising and there is a need to source them close to where they will be used to keep construction and transport costs down in order to improve affordability and sustainability.

Whilst these are important objectives, it implies that existing processes are inadequate and need improving to ‘secure access to these critical materials’. The number of existing mining leases in the West and South Gippsland region, both active and already approved, suggests that a secure pipeline of critical materials already exists. The report suggests that the current processes are too long, costly and uncertain and that biodiversity requirements are key constraints, involving very high upfront costs to the extractive industry. The proposals in the report seem to favour extraction at the expense of any other land use and remove any opportunity for community involvement.

The Overview also states:

‘The Victorian Government is inviting feedback on:

1. the **methodology** used to inform the SERA pilot project,
2. the SERA **boundaries** in the two pilot locations, and
3. the **planning controls** drafted to implement them.’

1. Methodology

The stated aim of the report is to ensure greater certainty for the extractive industry. It aims to achieve that by designating areas as SERAs and reducing the need to justify why quarrying is appropriate at particular sites. Effectively, the report prioritises the needs of extractive industries at the expense of any other activities including environmental, community and local government interests and use by other industries and food production. The report maps demonstrate the wide coverage of a potential SERA (and State Resource Overlays) in South Gippsland. The area involved includes a nature conservation reserve and a natural environment that seems to have been given little or no consideration. What defines a ‘suitable location’ should be clarified in terms of the ecological, landscape, habitat and vegetation values of each proposed area. Detailed analysis and proper consideration of sensitive environments need to be undertaken before any decisions are made.

2. Boundaries

My comments on boundaries relate only to the Gippsland pilot locations.

The marked SERA investigation area and extractive industry interest areas, if approved, would end any possibility of creating wildlife corridors and linkages of existing small reserves, from north to south of the eastern shoreline of Western Port. The area proposed to be ‘carved out’ for quarrying is

enormous and appears to include part, if not all, of the Holden Proving Ground site. It would be a desecration to turn this site into a sand mine or quarry. Remediation would be impossible. Designation of all these areas as SERAs is a land grab of amazing proportions. Sourcing resources close to where they will be used to keep costs (to the industry) down and to improve affordability and sustainability is laudable but at what cost to irreplaceable environments? There is an argument for using nearby sites where appropriate and suitable but, in order to protect highly sensitive, valuable and unique sites, surely it is worth sourcing some resources from further afield and paying the price. Proximity to Melbourne for the SERA and EIA boundaries is not a 'sustainable' practice if it destroys irreplaceable landscapes, habitats and puts endangered species at risk. Nor is it affordable if you factor in the costs of environmental destruction into the future.

Demand for building materials will certainly continue to rise in the future but new materials and construction methods are being developed all the time. Surely it would be prudent to explore some of these options, including using recycled materials, to reduce the need to excavate non-renewable resources and devastate landscapes, ecosystems and habitats which are already under pressure.

3. Planning Controls

The project appears to elevate the importance of extractive resources at the expense of the natural environment, landholders such as farmers and traditional custodians, activities such as tourism and other key planning considerations. Areas with high biodiversity value have been included within the proposed SERA boundary as they apparently do not necessarily 'restrict or impinge' on quarry operations.

There will no longer be any requirement for public notification and participation so local communities will not be included in the planning process. Local Government input would be severely restricted. Coverage of the proposed overlay would not only apply to existing resource sites, but also to future expansion and buffer zones. This prioritises planning for extraction sites above all other potential uses and weakens existing planning processes which provide some protection for sensitive sites. This is a retrograde step which should not be allowed to happen.

Planning controls should continue to be robust, comprehensive, consultative and transparent. The extractive industry should be planning ahead to allow time for necessary resources to come on line after thorough consideration of each proposal. Where proposals are in competition with other uses there should be a process of assessment which could result in re-negotiation or compromise to minimise conflict.

In October 2019, the State Government declared Bass Coast Shire as a Distinctive Area and Landscape, offering increased protection to the coastal environment. The environment is the economy for Bass Coast and it is an important visitor destination for travellers from interstate, internationally and locally. Western Port is a Ramsar wetland, part of a UN Biosphere and contains three small marine National Parks. The eastern coastline of Western Port is very fragile and, inland, the remnant vegetation is vulnerable. The State Government is putting protections in place for these sites and yet the SERA program seems to be trying to remove or weaken these protections for the same sites.

The Legislative Council Environment and Planning Committee of State Parliament is currently undertaking an inquiry into the decline of Victoria's ecosystems and measures to restore habitats and populations of threatened and endangered species. It is seeking public submissions. It is well known that a major cause of ecosystem decline is development. Some of these declining ecosystems, disappearing habitats and endangered species are within the South Gippsland SERA

boundary and the extractive industry interest areas. These competing imperatives need to be reconciled via a considered, coordinated and transparent planning process

Summary

- The needs of extractive industries must be balanced alongside the needs of the environment, food production, local government planning, other industries, including tourism and other site-specific needs such as cultural importance to traditional custodians.
- Research should be undertaken as a matter of urgency into the development and use of new and recycled materials to reduce the amount of quarrying required in order to provide for estimated future needs.
- Planning controls should not be strengthened not weakened. Community consultation and participation is vital. Any refinement should ensure that the planning process is robust, comprehensive, consultative and transparent.
- Detailed site investigations and analysis should be undertaken before any designation is made.
- Careful consideration and balancing of competing objectives should be co-ordinated within State Government to reduce the occurrence of contradictory initiatives working against each other.
- The pilot project should not proceed any further until a full environmental analysis is undertaken of the proposed sites. Further consultation should occur to ensure the best outcomes for the State, both now and into the future.

I would be happy to discuss this submission further, if you require any clarification.