

Department of Environment, Land, Water & Planning
planning.implementation@delwp.vic.gov.au

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

I write as an individual who has been a resident of Bass Coast since 2010. I am currently one of the Bass Coast Shire Councillors for Western Port Ward and also Deputy Mayor of Bass Coast.

My main concern is the part of the pilot project which includes sites on the eastern shores of Western Port and up into the hinterland. Several of these sites encroach on part of the Holden Proving Ground (HPG). There is a strong community alliance, supported by the Bass Coast Shire Council, working to preserve the HPG.

The HPG is a unique tract of coastal forest which has been protected from encroachment for the past sixty years. It provides habitat for many species of flora and wildlife, several of which are endangered. It is irreplaceable.

Contiguous with the HPG is Bell Park. This is a similar, perhaps identical parcel of rare bushland that has also been protected for decades. Unlike the privately owned HPG, Bell Park is Crown Land. I am alarmed to see that the land on the Bass Coast side of the South Gippsland Highway that is earmarked for the pilot project includes part of Bell Park.

There is potential for these sites to form part of a wildlife corridor and link with other remnant landscapes as part of a regional nature reserve. Perhaps even a National Park. **Allowing sand-mining on even a part of either of these sites would be wanton environmental vandalism in the extreme. Consideration of exploitation by extractive industry is unconscionable.**

The hills of South Gippsland were cleared to build Melbourne. The sea grass meadows of Western Port were harvested to the point of extinction and also shipped to Melbourne for the building.

Since colonisation, about a hundred of Australia's unique flora and fauna species have become extinct. According to Professor Hugh Possingham populations of threatened species are declining at the rate of 1% a year.

The SERA document 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.**'

I find the use of 'consider' threatening in the extreme. It provides no re-assurance that anything other than extractive industry will be taken into account. 'Consider', in this context, is a semantic mirage, a hint of a promise to think about trees while the excavators refuel.

The project will give equal weight to each of those factors. That's patently impossible. This project elevates the importance of extractive resources at the expense of the natural environment and other key planning considerations.

The document also states 'The Victorian Government is committed to helping secure access to critical materials to build our future homes and infrastructure affordably.' That reads like a foregone conclusion.

The number of existing mining leases in the West and South Gippsland region ensures a secure reserve of material. The report infers that the current processes are too convoluted uncertain as biodiversity requirements are constraints that need to be overcome at high upfront costs to the extractive industry. I doubt that sand miners are at risk of economic extinction and I assume they are in this for a profit which is slightly diminished by an inconvenient need to justify ripping up ancient grass tree forests, cultural heritage and irreplaceable landscapes.

The proposals in the report favour extraction at the expense of any other land use and remove any opportunity for community direction of unfettered rapaciousness.

The stated aim of the report is to ensure greater certainty for the extractive industry. It aims to achieve this by designating areas as SERAs and remove the need to explain, let alone justify, why quarrying is appropriate at any particular site.

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 or even food production.

The area involved includes a nature conservation reserve and a natural environment that seems to have been given consideration but no substantive or meritoriously decisive thought process.

What defines an unsuitable location should be clarified in terms of the ecological, landscape, habitat and vegetation values of each proposed area. Detailed analysis and proper scrutiny of sensitive environments need to be undertaken before any decisions are made.

SERA investigation areas and extractive industry interest areas, if approved, would destroy any possibility of future wildlife corridors and linkages of existing small reserves.

The area proposed to be 'carved out' for quarrying is enormous and appears to include part, if not all, of the Holden Proving Ground and Bell Park sites.

These areas belong to the future. It would be a multi-generational blunder to turn these places into a sand mine or quarry. Remediation would be impossible.

Designation of all these areas as SERAs is a rapacious deed of mammonish intent and mammonic proportion.

Various well-meaning people decided that this continent needed rabbits, foxes and lantana. If we allow these last few irreplaceable parcels of bushland to be cleared and excavated we join that list of well-intentioned, ill-informed fools. If we tear an eco-system apart, whatever we replace it with is clearly not that eco-system; it is clearly something else.

With two decades gone in the 21st century we need move on from 19th century concepts and invest in recycled, re-used and repurposed building materials. This SERA 'investigation' needs to be cancelled and filed in the waste basket of history alongside scientific whaling and backyard incinerators.

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 clearly under pressure.

The project elevates the importance of extractive above all else. 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. This is a ridiculous assumption and is the reverse of any logical thought process. Trucks passing through, or near, sensitive areas pose a bio-security threat, impinging on the amenity, serenity and nocturnal activity. We need to conserve what's there now, not ensure that it doesn't literally get in the road.

"THEY have a title that makes an impertinence of the thought of restricting their ambitions." - Letter to the editor of *The Argus*, 1927. Have times changed?

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.

Last year the State Government declared Bass Coast Shire a Distinctive Area and Landscape, under the *Planning and Environment Act 1987*, offering increased protection to the coastal environment. SERA runs counter to that.

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's Environment and Planning Committee is undertaking an inquiry into the decline of Victoria's ecosystems and measures to restore habitats and populations of threatened and endangered species.

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.

The SERA pilot project is almost the exact opposite of that process.

If 3rd party voices are removed from the process, any Crown Land, such as Bell Park, that becomes an 'area of interest' would inevitably become yet another mine.

Is nothing as sacred as a glass tower or more precious than a hole in the ground?

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]