

Avoid and Minimise Statement

485 Cooper Street, Epping, Victoria



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Executive Summary

The avoid and minimise statement outlined in this document relates to a proposed industrial development at 485 Cooper Street, Epping. The site is approximately 352,000M2 in size and is zoned Industrial 1 (INZ1). The lot adjoins the Merri Creek to the West, Barry Road Grasslands to the South, Hume Hwy to the East and an approved industrial development to the North. Previous uses of the site include quarrying, a golf course and uncontrolled access such as motocross and dumping.

The study area has been subject to regional strategic planning through the application of an Environmental Significance Overlay to the Western portion of the property. The development plan overlay for the site, as detailed in Schedule 33 of the Whittlesea City Council's planning scheme, outlines the requirements for site level planning. Road access into the site is predetermined by the approved development plan for 481 Cooper Street.

The GPT Group engaged Nature Advisory Pty Ltd, to conduct a detailed flora and fauna assessment of the site in August 2022. The assessment found that the majority of the study area was treeless open grassland, dominated by introduced pasture grasses and broad-leaf weeds. Interspersed throughout the study area are various sized patches of plains grassland, grassy woodland, grassy wetland, riparian woodland, escarpment shrubland, tall marsh vegetation and EPBC listed Native Temperate Plains Grassland of the Victorian Volcanic Plain.

A number of schemes for the proposed development have been created in response to the regional strategic level planning, the development plan overlay, site assessments and extensive consultation with local authorities. The proposed scheme, and supporting conservation management plan, result in a net gain in native vegetation through the preservation and rehabilitation of the Environmental Significance Overlay. Following the multiple amendments made to the plans no feasible opportunities exist to further avoid and minimise impacts on native vegetation without undermining the key objectives of the proposal.

Background

The avoid and minimise statement contained here within, relates to the proposed development at 485 Cooper Street, Epping. The site, located in the city of Whittlesea, is generally rectangular in shape with the Eastern boundary aligning with the Hume Freeway, the Western boundary aligning with Merri Creek and the Southern Boundary aligning with the Barry Road Grasslands. The land is approximately 352,000M2 in size and is zoned Industrial 1 (INZ1). Previous uses of the site include quarrying, a golf course and uncontrolled access involving motocross and dumping. Arial images showing the historical uses of the site are provided at Appendix X.

The GPT Group engaged Nature Advisory Pty Ltd, to conduct a detailed flora and fauna assessment of the site in August 2022. The assessment found that the majority of the study area was treeless open grassland, dominated by introduced pasture grasses and broad-leaf weeds. Interspersed throughout the study area are various sized patches of plains grassland, grassy woodland, grassy wetland, riparian woodland, escarpment shrubland, tall marsh vegetation, EPBC listed Native Temperate Plains Grassland and Grassy Eucalypt Woodland of the Victorian Volcanic Plain.

Following the flora and fauna assessment Nature Advisory were engaged to conduct targeted surveys for Matted Flax-lily, Golden Sun Moth and Growling Grass Frog, none of the targeted species were identified.

Strategic Level Planning

The study area has been subject to a regional strategic planning through the application of an Environmental Significance Overlay (ESO) to the Western portion of the property.



The purpose of the Environmental Significance overlay is:

- To identify areas where the development of land may be affected by environmental constraints.

- To ensure that development is compatible with identified environmental values.

The area included in the ESO also provides crucial connectivity for the wider galada tamboore area and the Merri Creek Corridor which is are designated as part of currently in the planning process of becoming as a Regional Parkland (maram baba Merri Creek Parklands) in the Future Directions Plan for this Parklands (see marram baba Merri Creek Regional Parklands Future Directions Plan Dec 2023 (exploreoutdoors.vic.gov.au) The Merri Creek corridor is also an important indigenous cultural feature which is known to support indigenous cultural heritage values.

The presence of the Environmental Significance Overlay and the factors outlined above, indicates that priority should be given to the Western portion of the property when planning for biodiversity values across the site.

Site Level Planning

Schedule 33 to the Development Plan overlay, applicable to the site, requires a plan to be developed in general accordance with the concept plan shown at Clause 4.0 of the schedule – the concept plan is provided at appendix I for reference.

This requirement was the starting point for the initial site level planning undertaken for the development, however there were a number of limitations to the concept plan that needed to be considered. These limitations are outlined below:

- The plan doesn't take into consideration the requirement to manage stormwater runoff from the site. The advice from Melbourne Water and engineering consultants Costin Roe is that a storm water asset needs to be constructed at the South West of the site. This is due to the topography of the land which slopes North East to South West, and the requirement to discharge into Merri Creek.
- The development plan for 481 Cooper Street was processed separately to the proposed development. The approved plan for 481 Cooper Street deviates substantially from the concept plan and predetermines the road access points into the site. A copy of the plan is provided at appendix II.
- The concept plan doesn't take into consideration the topography of the site, in particular the 15 meter difference levels at the North West of the site. A copy of the site survey is provided at appendix III.

- The concept plan does not take into consideration native vegetation and habitat on the site. A copy of the site vegetation mapping is provided at appendix IV.

Scheme A

The first revision of the development plan provided at appendix V (Scheme A) focuses on the retention of patches of native vegetation of the highest value, in particular patches A and L, and the creation of a continuous public reserve along the Barry Road Grasslands. The plan also allows for the retention of in excess of 80% of river redgums located on the site.

It should be noted that this scheme doesn't look to retain patch P as the patch is impacted by the location of the estate road which is predetermined by the approved development plan for 481 Cooper Street. Smaller patches of vegetation dispersed throughout the property were also unable to be retained. This is due to the sloping topography of the site and the requirement for large level building pads, and hardstand areas, for loading and unloading of B Double trucks. A draft copy of the cut and fill plan is provided at appendix VI to demonstrate the extent of bulk earth works required to develop modern industrial facilities.

The assessment of the advantages and limitations of Scheme A are provided below:

Advantages:

- The plan is in general accordance with the concept plan provided in Schedule 33 to the Development Plan Overlay
- The plan allows for the retention of native vegetation patches L and A
- Retention of over 80% of river redgums on site
- Creation of a continuous public reserve at the interface of the Barry Road Grasslands

Limitations:

- Significant encroachment on the ESO
- Significant encroachment on areas of cultural heritage sensitivity
- Complete displacement of Plains Grassland (patch T and U)
- Partial displacement of Escarpment Woodland (patch S)
- Displacement of EPBC listed Growling Grass Frog fringe habitat (significantly encroaching on advised 100m buffer)
- Net loss of 1.2 hectares of vegetation across the site

Scheme B

After consideration of the limitations of Scheme A, in particular the net loss of native vegetation and the displacement of Growling Grass Frog fringe habitat, an alternative scheme was developed (Scheme B) with a focus on prioritising preservation of the ESO. A copy of Scheme B is provided at Appendix VII. The change in approach was coupled with the development of a conservation management plan with a focused on improving the quality of existing vegetation within the ESO, as well as well as regeneration of native grasslands through weed management and revegetation programmes. Advice provided from the Merri Creek Management Committee during the development of the conservation management plan indicates a good level of success has been achieved in the regeneration of native grasslands along the creek corridor.

The assessment of the advantages and limitations of Scheme B are provided below:

Advantages:

- Revegetation and conservation of the large majority of the ESO.
- Avoidance of development in the large majority of areas of cultural heritage sensitivity
- Retention of the majority of Plains Grassland (patch T and U)
- Retention of the majority of escarpment woodland (patch S)
- Conservation of EPBC listed Growling Grass Frog fringe habitat through protection of a 100m buffer along the creek.
- Opportunity to create an additional 5.12 hectares of native vegetation within the ESO
- Net gain of 1.21 hectares of vegetation across the site.
- The retention and revegetation of 8.12 hectares of native vegetation within the ESO

Limitations:

- Removal of native vegetation to the East of the site including patches A and L.
- Removal of an additional 5 river redgums when compared to Scheme A.
- Removal of continuous public reserve at the interface of the Barry Road Grasslands.
- Reduction of total land available for development when compared to Scheme A.

The assessment undertaken above, in particular the net gain of 1.21 hectares of native vegetation, conservation of EPBC listed Growling Grass Frog fringe habitat,

and the retention and revegetation of 8.12 hectares of native vegetation within the ESO, strongly supported the decision to move away from Scheme A as the preferred strategy for the development of the site.

Scheme C

Consultation, based on Scheme B, was undertaken with various stakeholders included Melbourne Water, Merri Creek Management Committee, Parks Victoria and the City of Whittlesea over a period of 7 Months from September 2022 to March 2023. The consultation process included the provision of relevant assessments and site information, in person meetings and site walks during spring months. A number of attempts were made to engage with The Department of Energy Environment and Climate Action (DEECA) during this time, little to no input was provided.

Scheme C was developed in response to feedback provided during the consultation period, namely a desire to see the bio retention system relocated out of the ESO, requests to consider the retention of additional River Red Gums, and requests to honour the intent of the concept plan with a road interface along the grasslands to the south, in particular for fire management. A copy of scheme C is provided at appendix VIII.

Scheme C goes beyond the avoidance outlined in Scheme B by removing the bio retention system from the ESO as much as feasibly possible, while also achieving the retention of an addition 3 river redgums on the site. It also provides for a public reserve across approximately 75% of the interface with the grasslands as well as dedicated fire access to the grasslands.

Scheme C demonstrates a commitment to achieving the best environmental outcomes for the site while also balancing the requirements of important stakeholders. These outcomes have been reached through a further reduction to the development footprint to what was proposed in Scheme B. This was achieved through the complete removal of warehouse 5 from the scheme.

Scheme D

Scheme C was then used for consultation with Parks Victoria and The Department of Energy Environment and Climate Action (DEECA).

Parks Victoria, responsible for management of the grassland reserve to the south of the development on behalf of the Victorian Government, raised concerns about the potential impact of shading on grasslands to the south. Shadow diagrams

were created for the hours between 10am–3pm on 22 June. This exercise showed that Scheme C did create shading as can be seen in the figure below.



Scheme D, provided at appendix IX, was created in response to the shading concerns. The changes involved lowering of pad levels, relocating car parking to the southern boundary and the introduction of a landscaping buffer. These changes resulted in a loss of 1,000 M2 from warehouse 4.

DEECA also raised the suitability of the stormwater retention asset as habitat for growling grass frog. In response to this feedback dedicated growling grass frog habitat has been incorporated into Scheme D. The proposed habitat is located in close proximity to the creek in an area that was highly disturbed during the construction of the golf course. An image of the original ground disturbance in 1991 contrasted with the current condition is shown below.



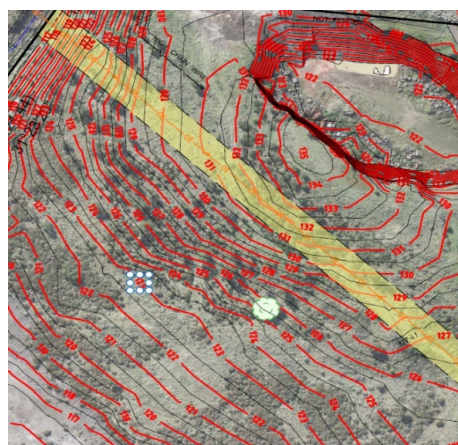
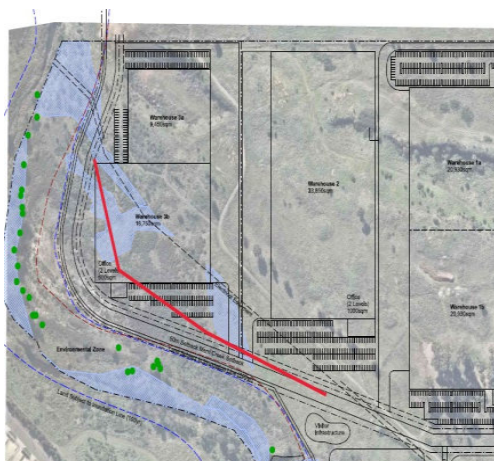
Ground Disturbance 1991



Current Condition 2022

Locating new habitat in this area provides the opportunity to create new habitat for the local Growling Grass Frog Community, in an area that would usually be constrained by cultural heritage sensitivities.

DEECA's review also requested consideration of a revised Scheme A that retained Patch A while reducing the impact on growling grass frog habitat within the ESO. A review concluded that, due to the steep gradient of the land in this area of the site, the change in road alignment would result in excessively high retaining walls (up to 12 meters) along the majority of the interface with the conservation area. After considering all the information provide DEECA provided endorsement of the proposed strategy for the site in November 2023.



Additional Measures

In addition to the the approach outlined above GPT will also minimise the impact of the controlled action through undertaking the following steps:

- Implementation of water sensitive urban design such as rain gardens, permeable paving and smart rainwater tanks in the construction of the warehouses.
- Seed harvesting from existing grassland communities for replanting within both the conservation zone and estate landscaping.

Conclusion

A number of schemes for the proposed development have been created in response to the regional strategic level planning, the development plan overlay, site assessments and extensive consultation with local authorities. The proposed scheme, Scheme D, and supporting conservation management plan, result in a net gain in native vegetation on site through prioritising the preservation and rehabilitation of the Environmental Significance Overlay, over isolated patches of vegetation to the east of the site. Following the multiple amendments made to the plans no feasible opportunities exist to further avoid and minimise impacts on native vegetation without undermining the key objectives of the proposal.

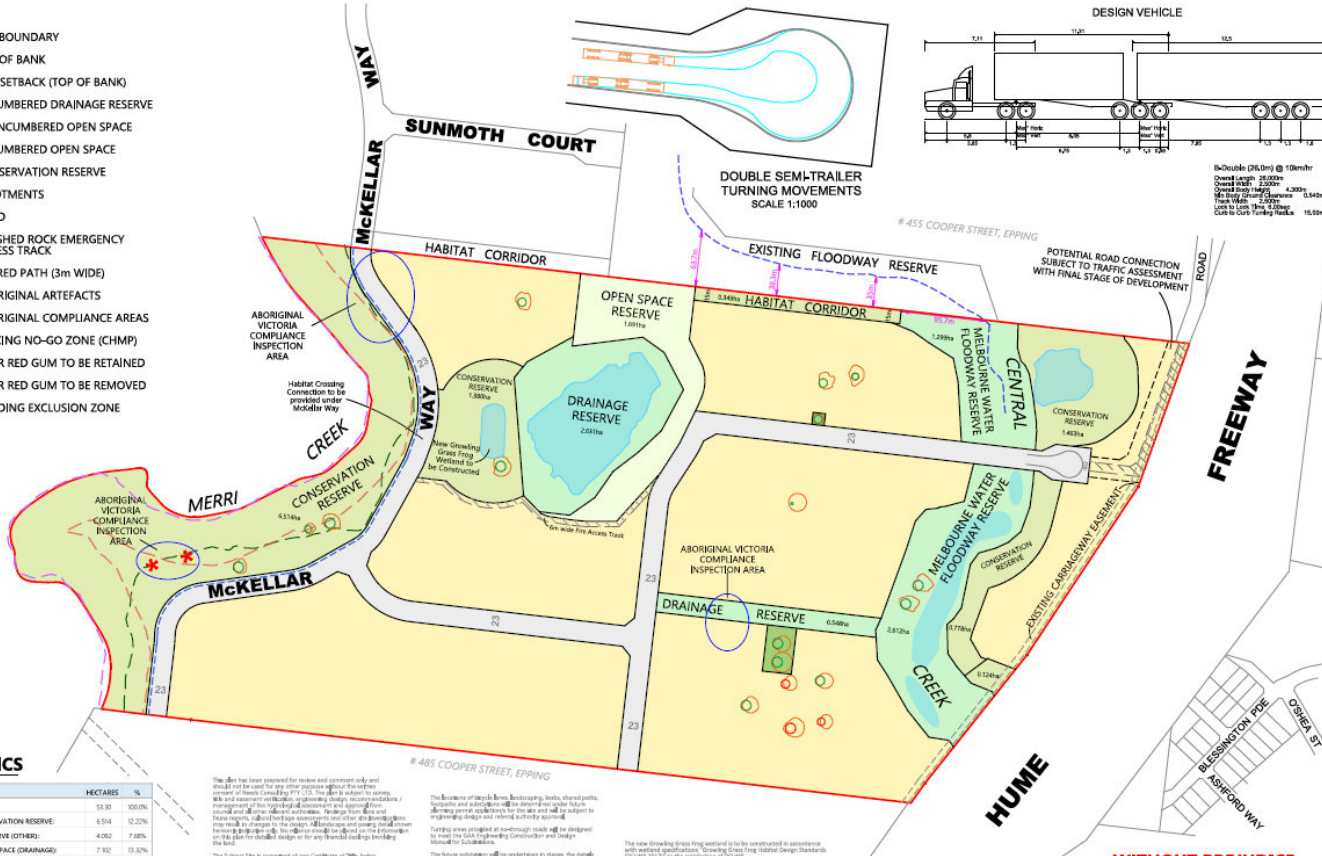
Appendix I – Site Concept Plan



Appendix II – 481 Cooper Street Development Plan

LEGEND

- SITE BOUNDARY
- TOP OF BANK
- 50m SETBACK (TOP OF BANK)
- ENCUMBERED DRAINAGE RESERVE
- UNENCUMBERED OPEN SPACE
- ENCUMBERED OPEN SPACE
- CONSERVATION RESERVE
- ALLOTMENTS
- ROAD
- CRUSHED ROCK EMERGENCY ACCESS TRACK
- SHARED PATH (3m WIDE)
- * * ABORIGINAL ARTEFACTS
- ABORIGINAL COMPLIANCE AREAS
- FENCING NO-GO ZONE (CHMP)
- RIVER RED GUM TO BE RETAINED
- RIVER RED GUM TO BE REMOVED
- BUILDING EXCLUSION ZONE



STATISTICS

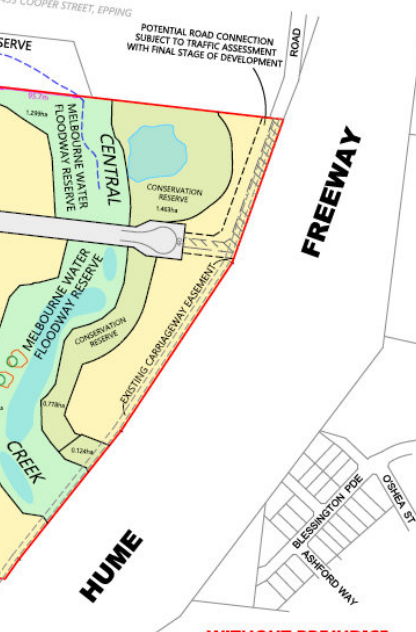
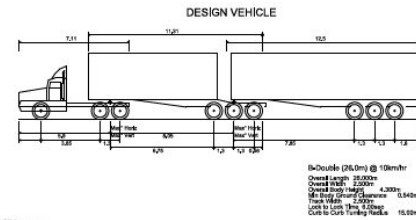
	HECTARES	%
SITE AREA:	53.30	100.0%
MERRI CREEK CONSERVATION RESERVE:	6.514	12.23%
CONSERVATION RESERVE (OTHER):	4.082	7.66%
ENCUMBERED OPEN SPACE (DRAINAGE):	7.702	14.45%
ENCUMBERED OPEN SPACE (FREE RESERVE):	0.769	1.44%
UNENCUMBERED OPEN SPACE RESERVES:	1.001	1.87%
TOTAL OPEN SPACE:	16.144	30.29%
AREA OF ROADS:	4.487	8.42%
AREA OF ALLOTMENTS:	29.22	54.83%

DEVELOPMENT PLAN
(SCHEDULE 33 OF DEVELOPMENT PLAN OVERLAY)
481 COOPER STREET, EPPING

This plan has been prepared for review and comment only and should not be used for any other purpose without the written consent of Reeds Consulting Pty Ltd. This plan is subject to survey and assessment conditions, engineering design, environmental management of the biological resources and approval from relevant government authorities. Any change to this plan and any other design or engineering may result in changes to the design. All conditions and approvals are subject to the relevant authorities' requirements and any other relevant legislation. The plan is subject to the relevant authorities' requirements and any other relevant legislation.

The Subject Site is comprised of one Certificate of Title, being Lot 101/101/0228/028 and Lot 101/101/0231/031. The title boundaries, acreage and areas are based upon the Reeds Consulting Pty Ltd. survey of the site dated 10/10/2021. The survey is subject to the Development Plan Overlay (the DPO) and the Victorian Planning Scheme. The survey is subject to the Victorian Planning Scheme. The survey is subject to the Victorian Planning Scheme.

The new drainage gully and wetland is to be constructed in accordance with relevant specifications, 'Growing Green' Frog Habitat Design Standards (DEW 2017) to the satisfaction of DEW. The planting schedule and information location within habitat corridors, open space reserves, drainage reserves, floodway reserves and open areas must be in accordance with the 'Growing Green' Frog Habitat Design Standards (DEW 2017) and to the satisfaction of DEW. The Road Crossing over Central Creek must be designed in accordance with the 'Growing Green' Frog Habitat Design Standards (DEW 2017) and to the satisfaction of DEW. The Road Crossing over Central Creek must be designed in accordance with the 'Growing Green' Frog Habitat Design Standards (DEW 2017) and to the satisfaction of DEW.

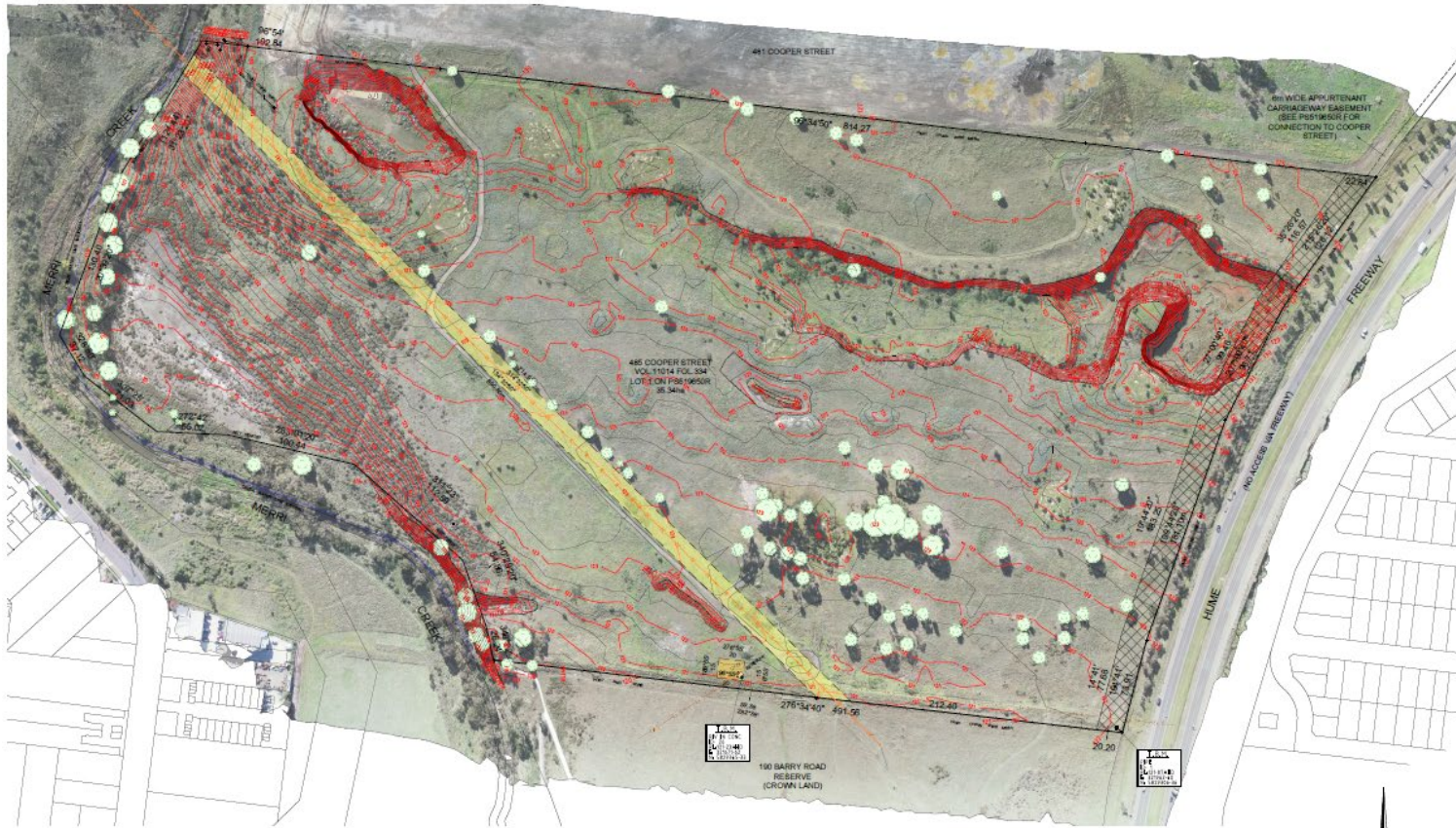


WITHOUT PREJUDICE
PRELIMINARY

LEVEL 6
440 ELIZABETH STREET
MELBOURNE VIC 3000
(03) 8666 3000
R.ANNING@REEDSCONSULTING.COM.AU
WWW.REEDSCONSULTING.COM.AU

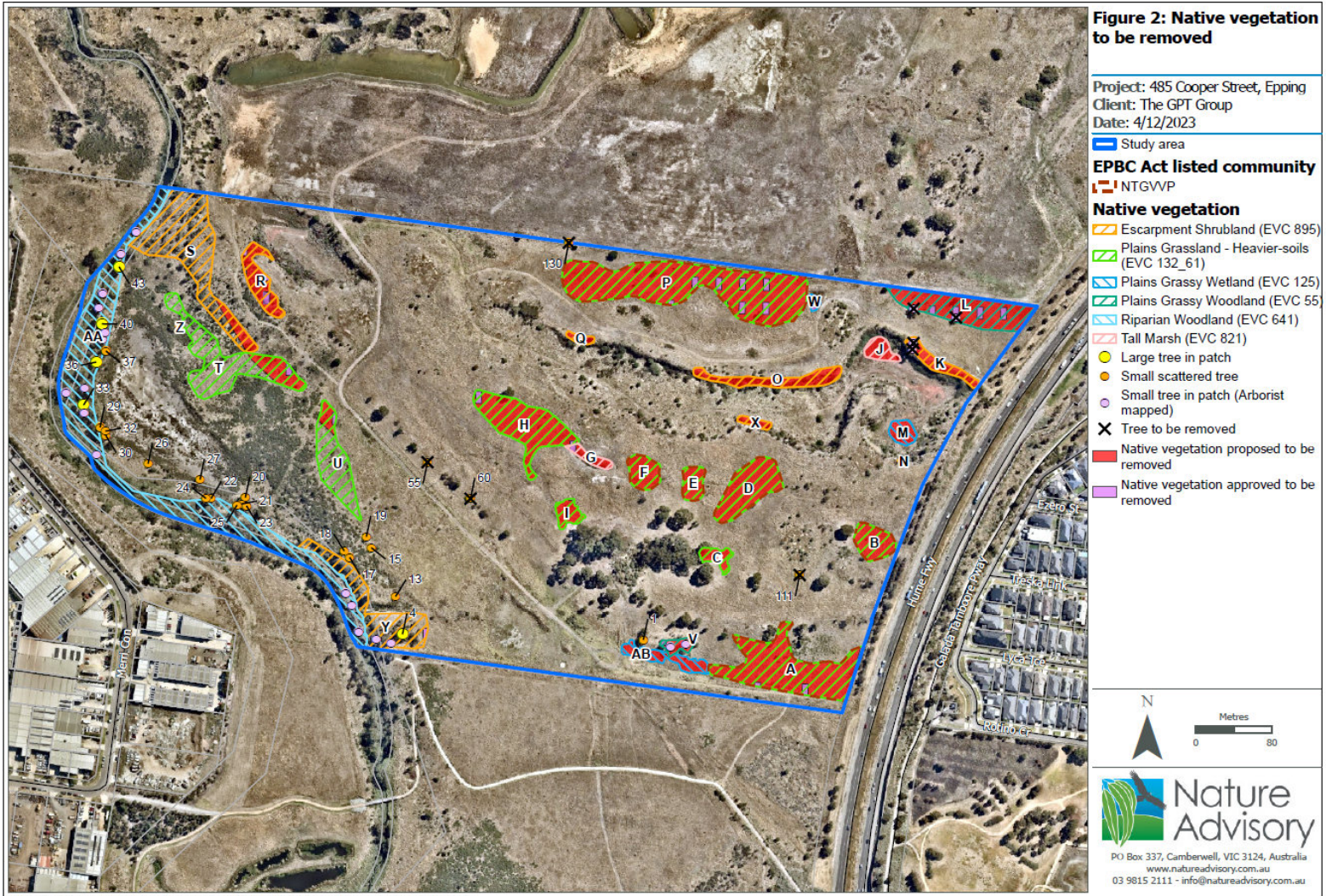
REEDS
CONSULTING

Appendix III – Site Survey



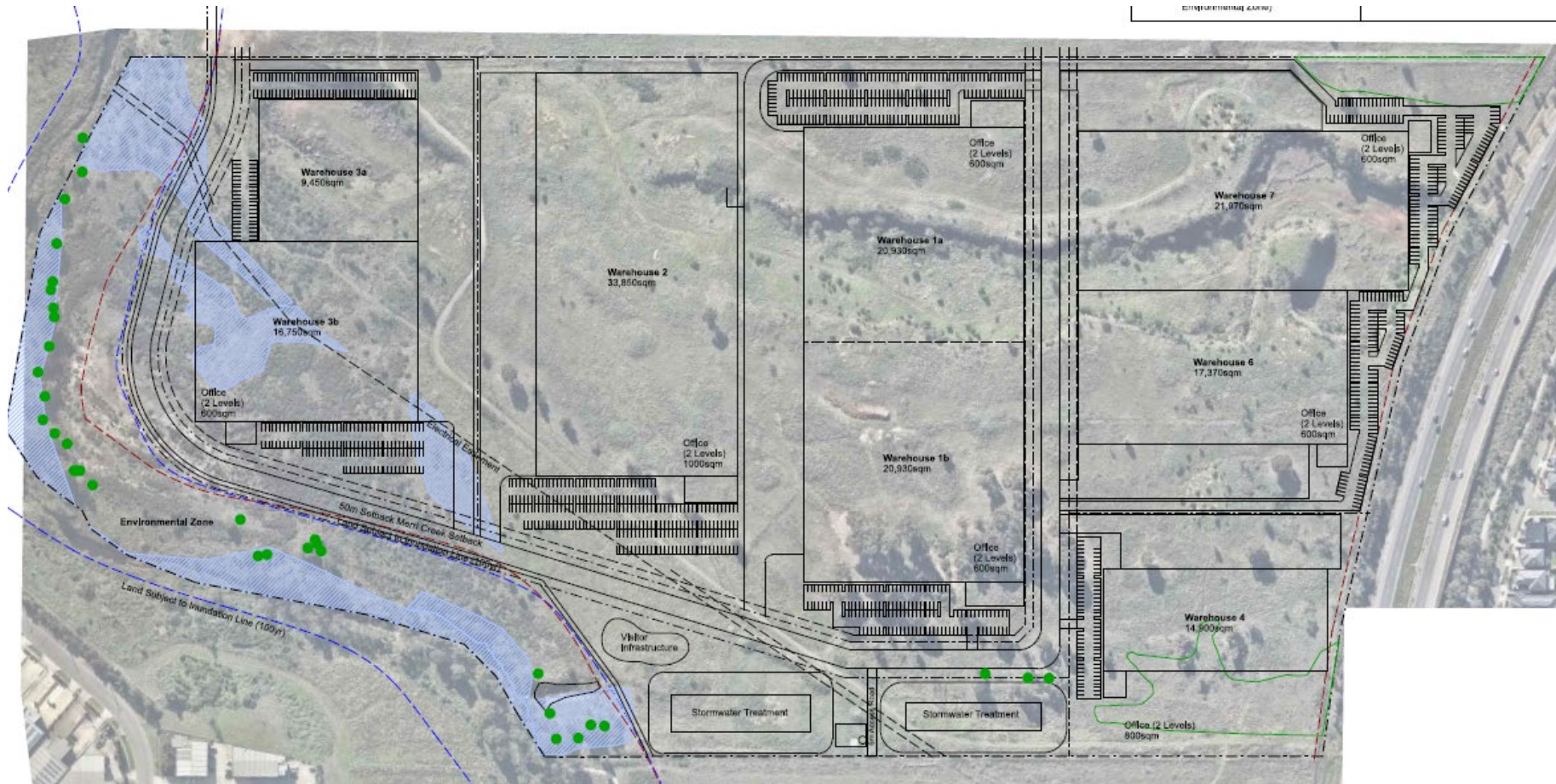
<p>NOTATIONS</p> <p>THE REFERENCE COORDINATES SHOWN ON THIS PLAN ARE AN APPROXIMATE PART OF THE INFORMATION PROVIDED AND MUST BE VERIFIED BY ANY REPRODUCTION.</p> <p>TITLE REFERENCE & NOTES</p> <p>THE TITLE REFERENCE IS: LOT 1 ON PS919650R 485 COOPER STREET MERRI CREEK (MERRI) COUNTY BOROUGH</p> <p>SEE PLAN FOR FULL DETAILS OF ANY COVENANTS, MORTGAGES AND/OR COVENANTS AREA BOUNDARY THIS PLAN IS SUBJECT TO ALL COVENANTS AND MORTGAGES.</p> <p>TITLE BOUNDARIES SHOWN BY THESE COLOURS HAVE NOT BEEN RE-EVALUATED BY SURVEY.</p> <p>THIS PLAN SHOULD BE READ IN CONJUNCTION WITH THE SURVEYORS REPORT DATED 24/05/2021.</p>	<p>SURVEY NOTES</p> <p>THIS SURVEY IS CONSIDERED TO BE A SURVEY OF THE LAND AND NOT A SURVEY OF THE BUILDING OR OTHER CONSTRUCTION TO BE LOCATED THEREON.</p> <p>THE SURVEY IS CONSIDERED TO BE A SURVEY OF THE LAND AND NOT A SURVEY OF THE BUILDING OR OTHER CONSTRUCTION TO BE LOCATED THEREON.</p> <p>THE SURVEY IS CONSIDERED TO BE A SURVEY OF THE LAND AND NOT A SURVEY OF THE BUILDING OR OTHER CONSTRUCTION TO BE LOCATED THEREON.</p> <p>CONTOURS & TERRAIN MODELLING</p> <p>CONTOUR INTERVAL: 0.5M MESH CONTOUR INTERVAL: 0.5M</p> <p>ALL DATA POINTS SHOWN ON THIS PLAN ARE THE RESULT OF A SURVEY AND ARE NOT TO BE USED FOR ANY OTHER PURPOSE.</p>	<p>SURVEY NOTES</p> <p>NOTE: THESE COORDINATES ARE NOT TO BE USED FOR ANY OTHER PURPOSE.</p> <p>NOTE: THESE COORDINATES ARE NOT TO BE USED FOR ANY OTHER PURPOSE.</p> <p>NOTE: THESE COORDINATES ARE NOT TO BE USED FOR ANY OTHER PURPOSE.</p> <p>VIOLATION DATA</p> <p>THE PLAN CONTAINS DATA EXTRACTED FROM VARIOUS SOURCES INCLUDING:</p> <p>VIOLATION DATA</p> <p>THE PLAN CONTAINS DATA EXTRACTED FROM VARIOUS SOURCES INCLUDING:</p>	<p>SERVICE AUTHORITIES ASSET NOTES</p> <p>THE PLAN CONTAINS DATA EXTRACTED FROM VARIOUS SOURCES INCLUDING:</p> <p>OVERHEAD Electricity Wires Underground Electricity Cables Underground Communications Underground Gas Underground Water Underground Sewer</p> <p>DIAL BEFORE YOU DIG INFORMATION</p> <p>PLEASE CONTACT THE APPROPRIATE SERVICE PROVIDER BEFORE ANY WORK IS COMMENCED ON THE SITE.</p>																																		
<p>Hellier McFarland Development Consultants, Towns, Transport, Land & Environment Level 2, 1911 Malvern Road, Malvern East, VIC 3145 192 Bays 1226, Dingley, VIC 3145 Tel: 03 9532 9951 Fax: 03 9532 9841 www.hmf.com.au info@hmf.com.au</p>	<p>CERTIFICATION BY RELATION TO TITLE BOUNDARIES</p> <p>Author: John Powell Date: 24/05/2021 Title: 485 COOPER STREET LOT 1 ON PS919650R</p>	<p>SCALE 1:1500</p> <p>LENGTHS ARE IN METRES</p> <p>ORIGINAL SHEET SIZE: A1</p>	<table border="1"> <tr> <th>NO.</th> <th>DATE</th> <th>REVISION</th> </tr> <tr> <td>1</td> <td>24/05/2021</td> <td>INITIAL RELEASE</td> </tr> <tr> <td>2</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td></td> <td></td> </tr> <tr> <td>5</td> <td></td> <td></td> </tr> <tr> <td>6</td> <td></td> <td></td> </tr> <tr> <td>7</td> <td></td> <td></td> </tr> <tr> <td>8</td> <td></td> <td></td> </tr> <tr> <td>9</td> <td></td> <td></td> </tr> <tr> <td>10</td> <td></td> <td></td> </tr> </table>	NO.	DATE	REVISION	1	24/05/2021	INITIAL RELEASE	2			3			4			5			6			7			8			9			10			<p>REF No. 13231S/1 VERSION A DATE 24/05/2021 SHEET No. 1 of 1</p> <p>EXISTING CONDITIONS PLAN 485 COOPER STREET EPPING</p>
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Appendix IV – F&F Overlay

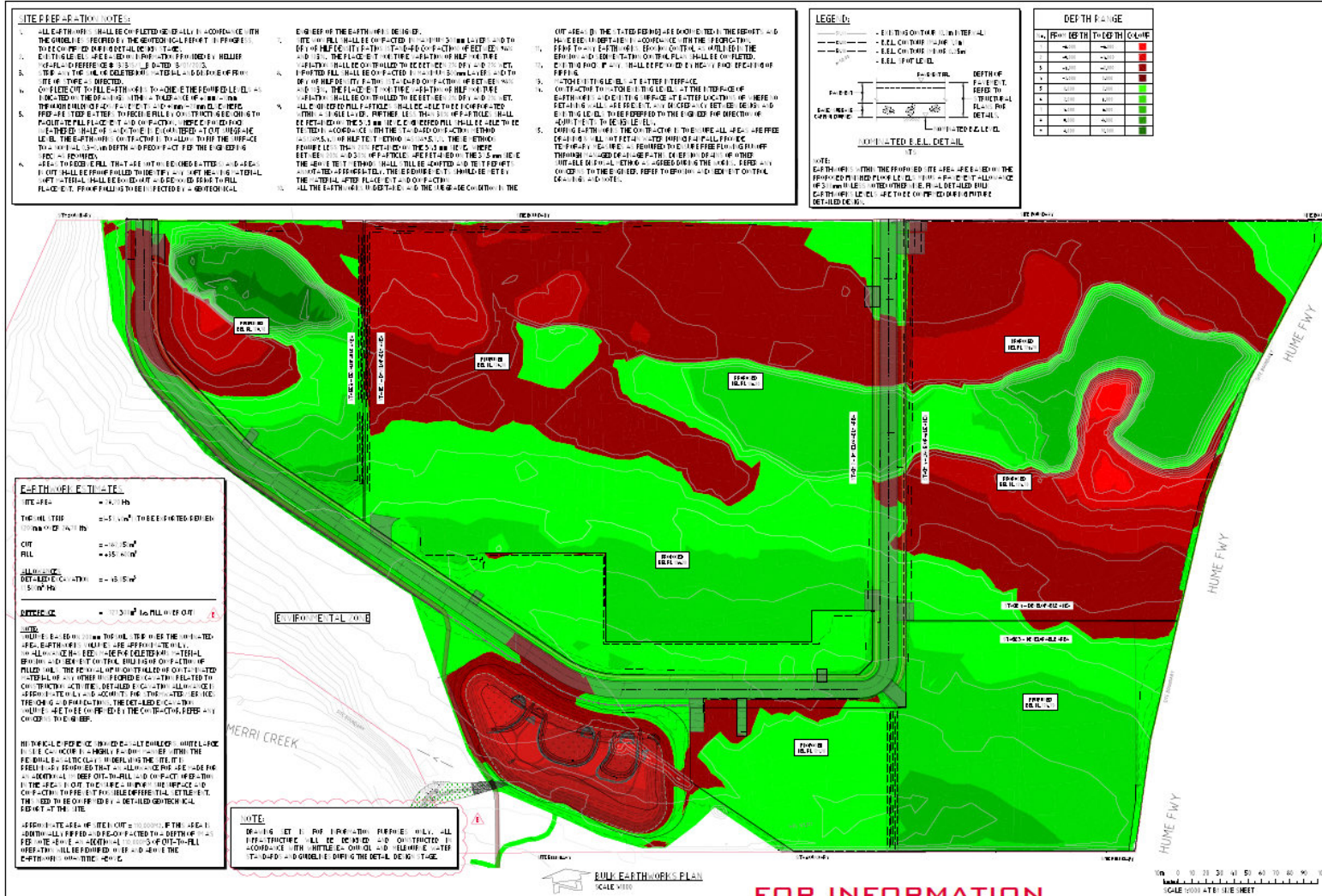


2207.11 Figure 2 Native vegetation to be removed - Created by: M:\2022 Jobs\22070\22070_11_CooperStEpping_Fig1\PD\RE_231114.aprx

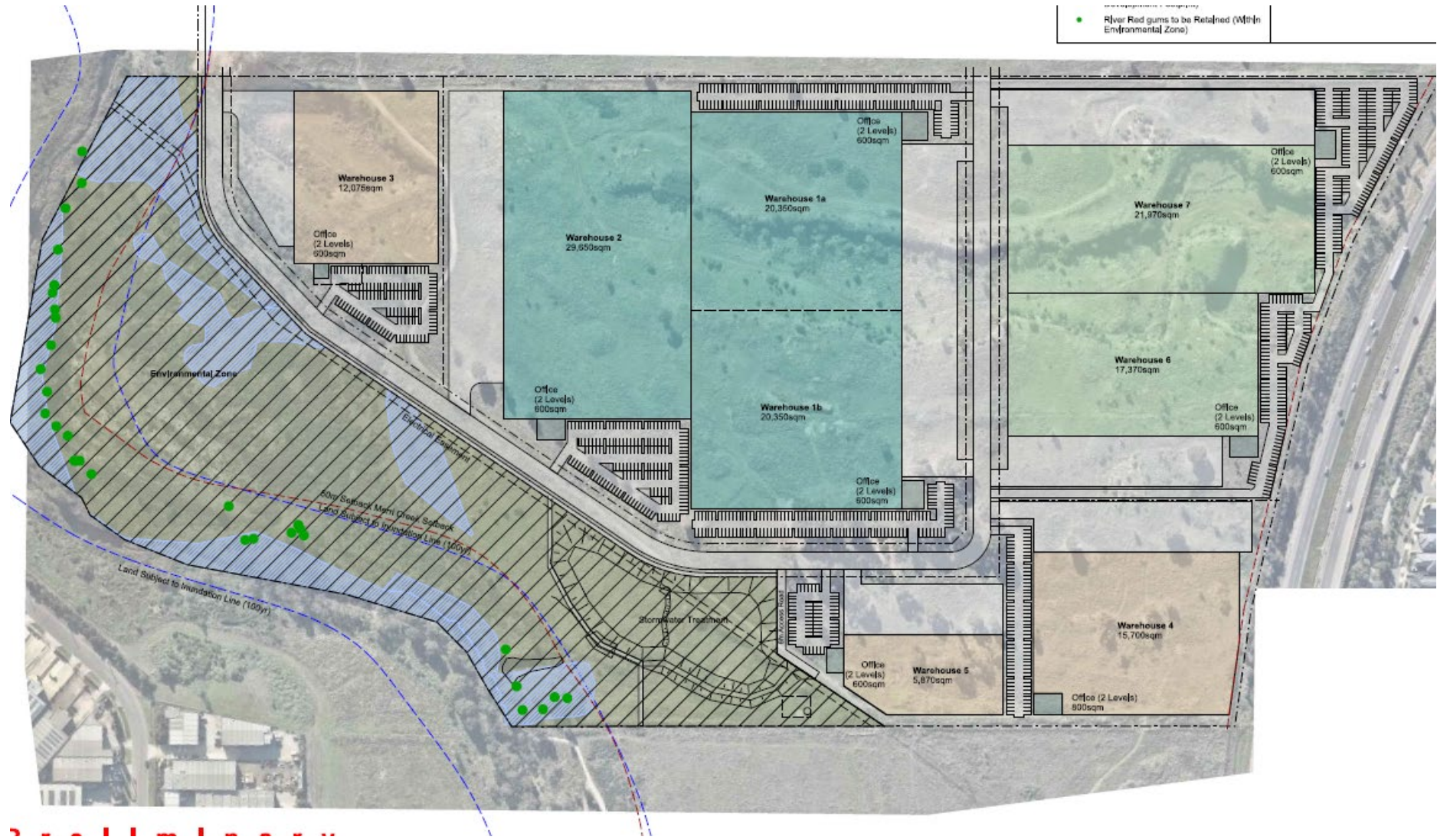
Appendix V – Scheme A



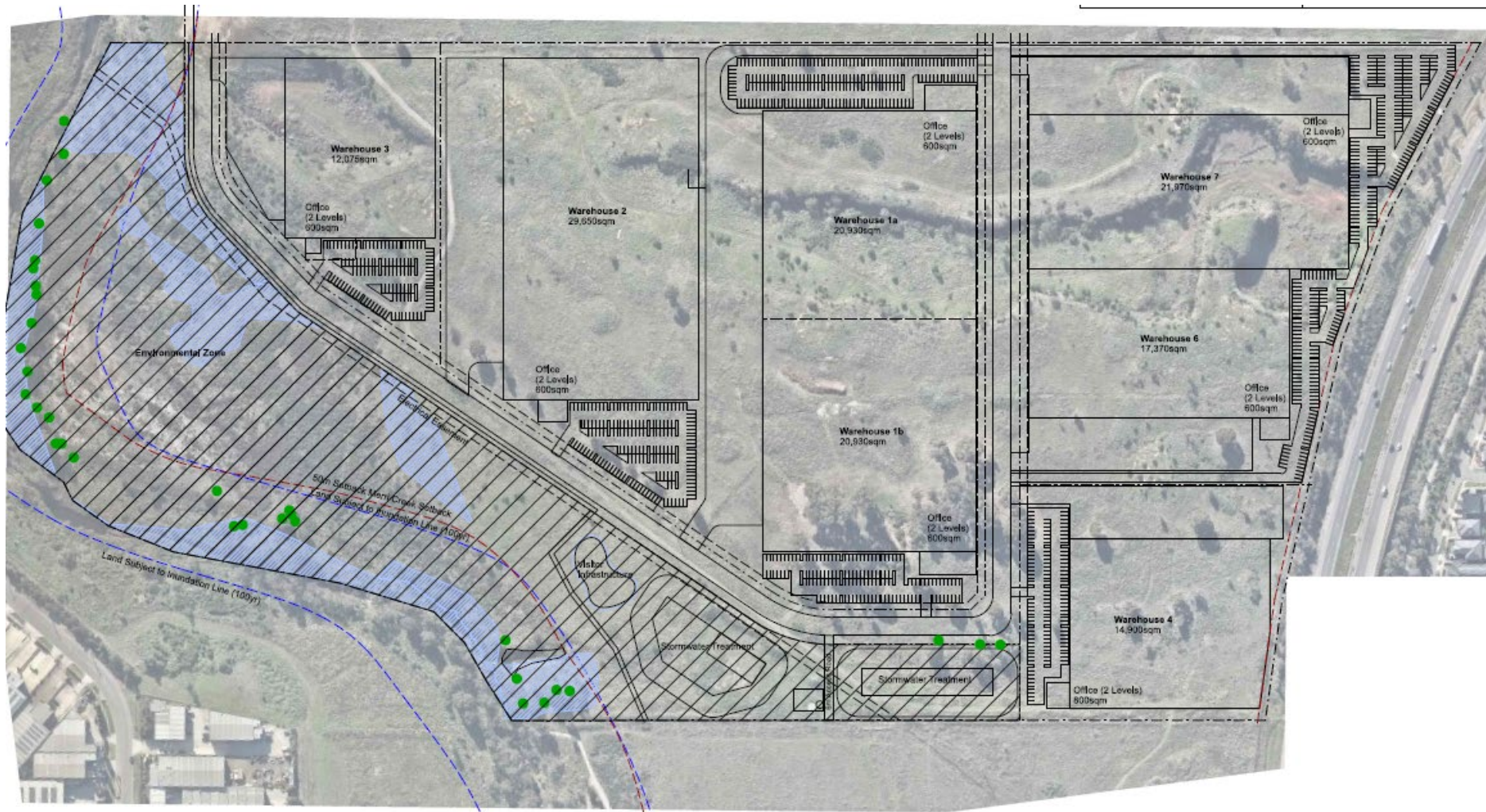
Appendix VI – Bulk Earthworks Plan



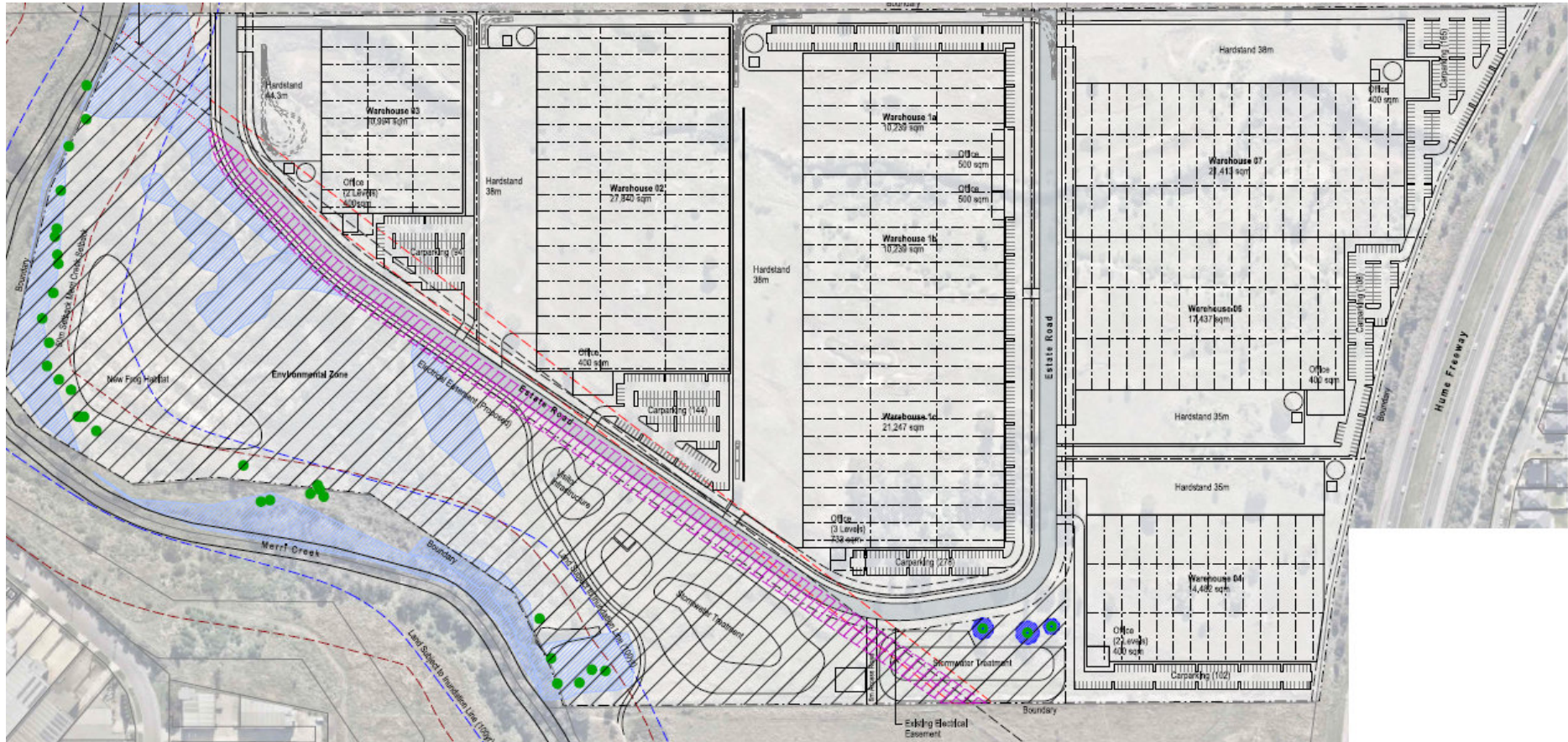
Appendix VII – Scheme B



Appendix VIII – Scheme C



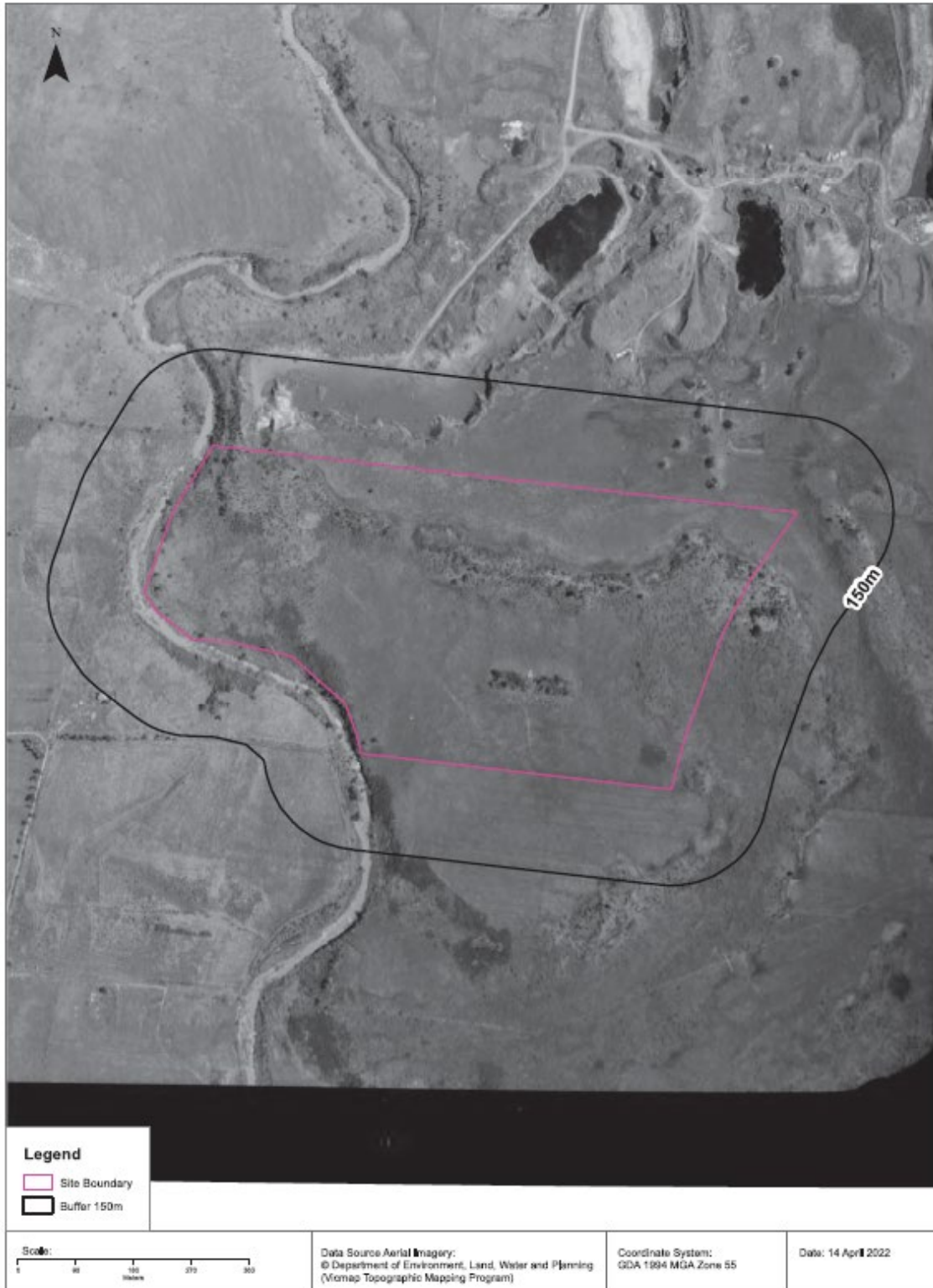
Appendix IX Scheme D



Appendix X – Historical Site Conditions

Aerial Imagery 1974

485 Cooper Street, Epping, VIC 3076











Appendix XI – Conservation Management Plan

See Appendix 4 of the Preliminary Documentation