IMPLEXA

TOWN PLANNING AND ECOLOGICAL CONSULTANCY

Biodiversity Assessment for 75-81 Murradoc Road Drysdale

Version 1 June 2026

Report Prepared for D P Planning

Report prepared by [redacted]
Implexa Planning and Ecological Consultancy
[redacted]

Project name: Biodiversity Assessment for 75-81 Murradoc Road, Drysdale

Cover Photograph A photograph of the study area taken during the site assessment.

Disclaimer
Although Implexa has taken all the necessary steps to ensure that an accurate document has been prepared, I accept no liability for any damages or loss incurred as a result of reliance placed upon the report and its contents.

Acknowledgement of country
This document was prepared on the land *of the Gulidjan and Gadubanud peoples of the Maar nation.* We acknowledge the Traditional Owners of country and pay our respects to them, their culture, and their Elders past, present and emerging.

Executive Summary

This Biodiversity Assessment was prepared by Implexa Planning and Ecological Consultancy on behalf of DP Planning in response to a Further Information Request issued by the City of Greater Geelong in relation to a proposed commercial development at 75–81 Murradoc Road, Drysdale. The proposal comprises a service station, convenience store, convenience restaurant/food and drink premises, gym (Snap Fitness), car wash, associated accessways, parking, stormwater infrastructure and landscaping works.

Council's Further Information Request identified vegetation clearing occurring on the site during 2024 and requested clarification regarding whether vegetation previously present constituted native vegetation under Clause 52.17 – Native Vegetation of the Greater Geelong Planning Scheme, and whether a planning permit for native vegetation removal is required.

The current planning application relates to Stages 1 and 2 of the broader development proposal only. Stage 3, located within the northern portion of the site, is excluded from the current application and will be subject to future assessment.

A site assessment undertaken on 3 June 2026 confirmed that vegetation within the proposed impact area (Stages 1 and 2) is highly modified and dominated by introduced pasture grasses, environmental weeds and disturbance-associated vegetation. No native vegetation meeting the definition of a native vegetation patch or scattered tree under Clause 52.17 was identified within the proposed impact area. Isolated occurrences of *Juncus pallidus* and *Juncus australis* were recorded outside the current application area within Stage 3 and will not be impacted by the proposal.

Assessment of vegetation removed during 2024, including review of historical imagery, surveyor photographs prepared by Smith Land Consulting (2024), Google Street View imagery and adjoining ecological information, determined that vegetation removed from the site comprised planted, ornamental and/or introduced vegetation associated with previous residential land use rather than remnant indigenous vegetation.

Based on the findings of this assessment, no native vegetation as defined under Clause 52.17 occurs within the proposed impact area and vegetation removed during 2024 is not considered to have comprised remnant indigenous vegetation. Accordingly, the proposal will not result in the removal, destruction or lopping of native vegetation and a planning permit for native vegetation removal is not required

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1.0 Introduction

1.1 Background and Purpose

Implexa Planning and Ecological Consultancy was commissioned by DP Planning to prepare a Biodiversity Assessment for 75-81 Murradoc Road, Drysdale, in response to a Further Information Request dated 23 April 2026 issued by the City of Greater Geelong in relation to Planning Permit Application No. PP-282-2026 for the proposed use and development of a service station, convenience restaurant, convenience store, gym (Snap Fitness) and car wash.

Council's Further Information Request identified vegetation clearing occurring on the site during 2024 and requested clarification regarding whether vegetation previously present constituted native vegetation under Clause 52.17 - Native Vegetation of the Greater Geelong Planning Scheme, and whether the proposal would result in the removal, destruction or lopping of native vegetation.

Accordingly, this assessment has been prepared to:

- determine whether native vegetation currently occurs within the proposed impact area associated with Stages 1 and 2 of the proposed development;
- assess whether vegetation cleared from the site during 2024 was likely to have constituted native vegetation for the purposes of Clause 52.17;
- respond to Council's Further Information Request regarding historical vegetation removal; and
- determine whether a planning permit for native vegetation removal is required under Clause 52.17 of the Greater Geelong Planning Scheme.

Historical vegetation removed during 2024 was reviewed to determine whether it constituted native vegetation under Clause 52.17.

1.2 Subject Site

The subject site is located at 75–81 Murradoc Road, Drysdale, Victoria and comprises a generally flat parcel of land within an established commercial precinct.

The broader development site is proposed to occur in stages. The current planning application relates to Stages 1 and 2 only, comprising a proposed service station, convenience restaurant, convenience store, gym (Snap Fitness) and car wash development. Stage 3, located within the northern portion of the site, is excluded from the current application and will be subject to future assessment.

The site is highly modified and has been subject to historical disturbance associated with previous residential and commercial land uses. Surrounding land to the east, south and west is zoned Commercial 2 Zone (C2Z), while land to the north is zoned Rural Living Zone Schedule 1 (RLZ1). The broader area includes limited native vegetation, planted shelterbelts and modified vegetation associated with residential and commercial development.

Figure 1 Aerial image of the site (VicPlan)

1.3 Proposal

The proposal comprises the staged development of a commercial site at 75–81 Murradoc Road, Drysdale. The current planning application relates to Stages 1 and 2 only and includes:

- a service station including fuel canopy and associated infrastructure;
- a convenience store;
- a convenience restaurant/food and drink premises;
- a car wash;
- a gym (Snap Fitness);
- vehicle access, parking and internal accessways;
- stormwater infrastructure, landscaping and associated civil works; and
- ancillary services associated with the operation of the development.

Stage 3, located within the northern portion of the broader site, is not included within the current planning application and is not being assessed as part of this report.

Council's Further Information Request identified historical vegetation clearing within the proposed development area during 2024. Accordingly, this assessment considers both existing site conditions within Stages 1 and 2 and the nature of vegetation historically present within the proposed impact area to determine whether Clause 52.17 applies to the current proposal.

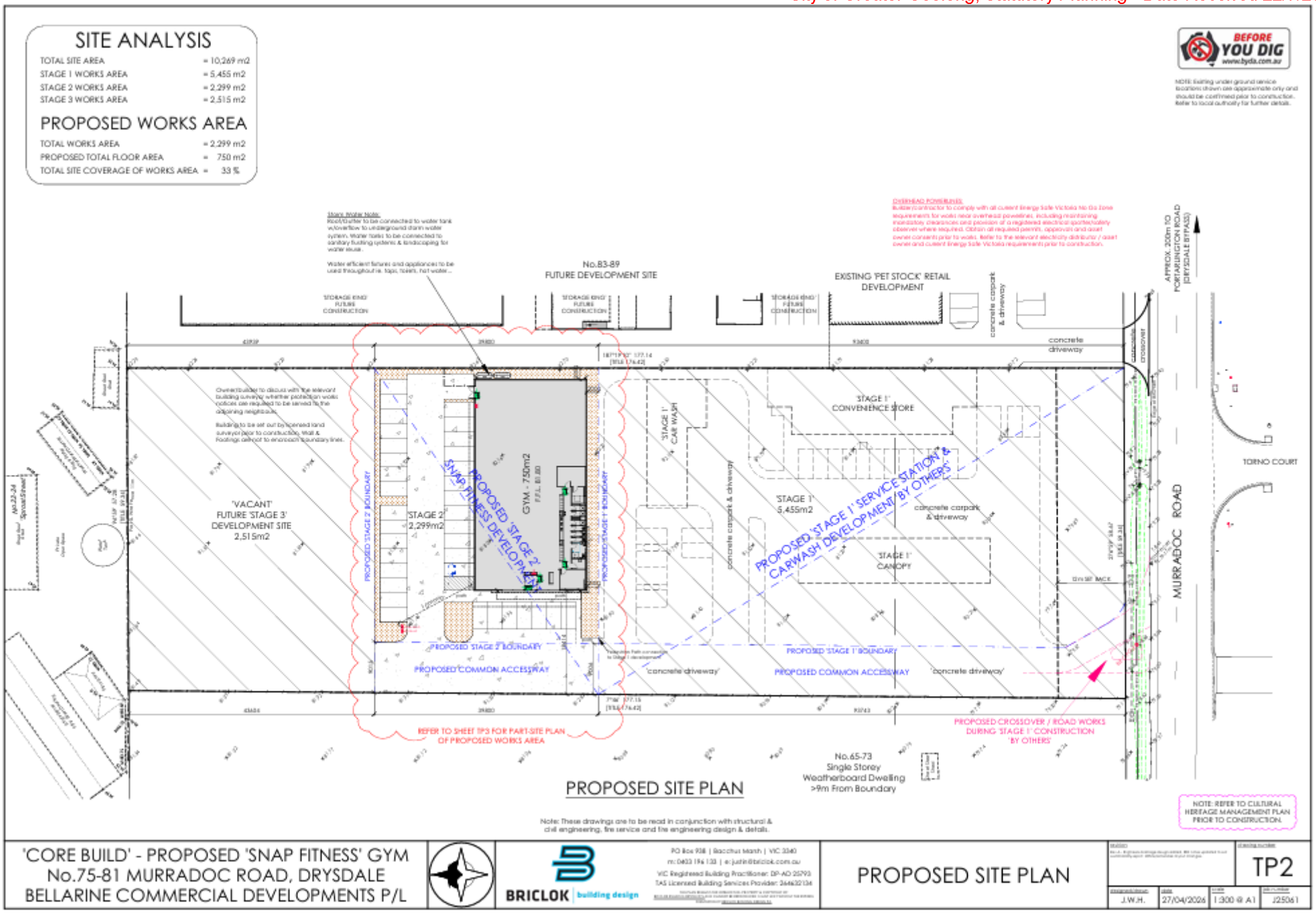

Figure 2 Proposed Development Plan – Stages 1 and 2

2.0 Methods / Native Vegetation Assessment

2.1 Desktop Review

A desktop review of relevant information sources was undertaken, including:

- The Native Vegetation Information Management System (NVIM) to determine biodiversity mapping and location risk requirements.
- NatureKit Maps, maintained by DEECA, which provide GIS mapping including modelled extent and pre-1750 Ecological Vegetation Classes (EVCs), extant native vegetation mapping and threatened species records.
- The Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Protected Matters Search Tool (PMST).
- VicPlan, Victoria's official statewide planning zone and overlay information service.
- Planning Schemes Online (DEECA).
- The Victorian Biodiversity Atlas (VBA) \
- Historical aerial imagery and available Google Street View imagery to assess historical vegetation cover and changes over time.
- Surveyor photographs prepared by Smith Land Consulting (2024) to assess vegetation present prior to clearing.
- Ecological assessments prepared for adjoining land to assist in understanding vegetation characteristics and historical context.
- Independent review of historical vegetation imagery by ecologist James Kidman to assist in determining whether vegetation cleared in 2024 was likely to constitute native vegetation under Clause 52.17.

2.2 Site Assessment

A site assessment was undertaken by [redacted] (Accredited Native Vegetation Assessor) on 3 June 2026.

The site inspection included the proposed development footprint and surrounding land to assess existing vegetation and determine whether vegetation within the site met the definition of native vegetation under Clause 52.17 of the Greater Geelong Planning Scheme.

Site-based information measured or observed included:

- An incidental survey of terrestrial vascular flora species occurring within the site.
- Identification of native and introduced vegetation species and assessment of vegetation condition.
- Assessment of whether vegetation met the definition of a native vegetation patch or scattered tree in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (DELWP, 2017).
- Identification of any native canopy trees or remnant vegetation patches within the proposed impact area.
- General observations of fauna habitat values and evidence of fauna use within the site.
- Identification of significant weed species and highly modified or disturbed areas.

- Consideration of historical vegetation patterns using available aerial imagery and site context to assess vegetation previously present on the site.

2.3 Assessment Criteria

The conservation status of native vegetation was determined in accordance with the Commonwealth EPBC Act, the Victorian Flora and Fauna Guarantee Act 1988 (FFG Act), and the Advisory List of Rare or Threatened Plants in Victoria (DEPI 2014).

Native vegetation is defined in the Victorian Planning Provisions as "plants that are indigenous to Victoria, including trees, shrubs, herbs and grasses." For the purpose of the *Guidelines for the Removal, Destruction or Lopping of Native Vegetation* (DELWP 2017), native vegetation is classified into two categories: Patch or Scattered Tree**.**

Native Vegetation Patch
A patch of native vegetation is either:

- an area of vegetation where at least 25% of the total perennial understory plant cover is native; or
- any area with three or more native canopy trees where the drip line of each tree touches the drip line of at least one other tree, forming a continuous canopy; or
- any mapped wetland included in the current wetlands map (available on DEECA online tools).

Scattered Tree
A scattered tree is a native canopy tree that does not form part of a native vegetation patch.

Note: A canopy tree is a mature tree greater than three metres in height and normally found in the upper layer of a vegetation type.

Ecological Vegetation Classes (EVCs)
An EVC is a native vegetation type classified according to its floristic, life form, environmental and ecological characteristics (DEPI 2013). Each EVC has a benchmark that describes the attributes of the vegetation type in its mature natural state, reflecting pre-settlement conditions.

3.0 Results

3.1 Existing Vegetation Within the Proposed Impact Area (Stages 1 and 2)

Pre-1750 Ecological Vegetation Class (EVC) modelling indicates the site likely historically supported Grassy Woodland (EVC 175). However, extant native vegetation mapping (2005) identifies the site as containing no remaining mapped native vegetation, consistent with the highly modified nature of the site (refer Figure 3).

A site inspection was undertaken to verify modelled vegetation and assess existing site conditions within the proposed impact area (Stages 1 and 2). The inspection confirmed that the site is highly modified and dominated by introduced pasture grasses, weeds and disturbed vegetation associated with historical land use and previous site disturbance.

The front (southern) portion of the site is highly disturbed and dominated by Kikuyu (*Cenchrus clandestinus*), Coastal Galenia (*Aizoon pubescens*), Dwarf Nettle (*Urtica urens*) and Panic Veldt-grass (*Ehrharta erecta*) as shown in Plate 1 and 2.

The rear portion of the proposed impact area supports introduced and disturbance-associated species including Mediterranean Cabbage (*Brassica fruticulosa*), Fiddle Dock (*Rumex pulcher*), Cocksfoot (*Dactylis glomerata*), Soursob (*Oxalis pes-caprae*), Ribwort Plantain (*Plantago lanceolata*), Rat's-tail Grass (*Sporobolus africanus*) and *Vulpia* spp.

No remnant native vegetation patches or native canopy trees meeting the definition of a scattered tree were identified within the proposed impact area.

The only native species identified within the broader site comprise isolated occurrences of Pale Rush (*Juncus pallidus*) and Austral Rush (*Juncus australis*) within Stage 3, which is not included within the current planning application as shown in Plate 3. While native species are present, vegetation cover within this area does not meet the minimum 25 per cent perennial native cover threshold required to constitute a native vegetation patch under Clause 52.17 of the Greater Geelong Planning Scheme.

Figure 3: Extant native vegetation mapping (2005) for the subject site, illustrating the absence of mapped native vegetation.

3.2 Assessment of Historical Vegetation Cleared in 2024

Historical vegetation removed from the site during 2024 was assessed using historical imagery, surveyor photographs prepared by Smith Land Consulting (2024), Google Street View imagery, an adjoining ecological assessment and independent review by ecologist James Kidman.

3.2.1 Roadside and Frontage Vegetation

Surveyor photographs prepared by Smith Land Consulting (2024), Google Street View imagery and inspection of existing and adjoining vegetation indicate that vegetation historically occurring within the roadside reserve and frontage of the site comprised predominantly planted species and environmental weeds associated with previous residential land use (refer Appendix 2).

Species identified from historical imagery include Giant Honey-myrtle (*Melaleuca armillaris*), Tuarts (*Eucalyptus gomphocephala*), Narrow-leaved Paperbark (*Melaleuca linearifolia*), fruit trees and environmental weeds including Agapanthus (*Agapanthus* spp.), Myrtle-leaf Milkwort (*Polygala myrtifolia* var. *myrtifolia*), Mirror Bush (*Coprosma repens*) and Spanish Heath (*Erica lusitanica*) as shown in Plates 7-10. The types of species and the arrangement in a line along the roadside frontage is consistent with planted roadside screening.

3.2.2 Eastern Boundary Vegetation

Historical aerial imagery may give the impression that a line of Tuart (*Eucalyptus gomphocephala*) trees formed part of the subject site due to the proximity of the planting to the eastern boundary. However, review of cadastral boundaries, historical imagery, surveyor photographs and the adjoining biodiversity assessment confirms that the Tuart windrow was located within the adjoining property to the east (83–89 Murradoc Road) rather than within the subject site (refer Appendix 3).

A biodiversity assessment prepared by Beacon Ecological for the adjoining property identified the trees as planted introduced vegetation and included photographic evidence of the Tuart windrow. The assessment specifically noted “planted introduced trees… including a line of Tuart (*Eucalyptus gomphocephala*)” occurring within the adjoining study area (refer Appendix 3).

Historical imagery and surveyor photographs indicate that the isolated tree previously occurring within the north-eastern portion of the subject site (removed in 2024) was a Tuart (*Eucalyptus gomphocephala*), a species not indigenous to the Drysdale area.

3.2.3 Western Boundary and Former Dwelling Vegetation

Historical vegetation occurring along the western side of the site appears to have comprised Giant Honey-myrtle (*Melaleuca armillaris*) and additional shrubs and small trees associated with previous residential landscaping (refer Appendix 2).

Vegetation surrounding the former dwelling, which has since been demolished, included fruit trees, Mirror Bush (Coprosma repens), Flax-leaf Broom (Genista linifolia) and other garden plantings, including fig (Ficus spp.) (refer Plates 12–16).While some species cannot be confidently identified from historical imagery, their form, spacing and appearance are consistent with ornamental garden plantings rather than naturally occurring indigenous vegetation.

Figure 4: Areas of historical planted vegetation removed in 2024 and retained native species within Stage 3.

3.3 Threatened species and floristic communities

3.3.1 Habitat importance modelling for threatened species

To support decision-making under the Guidelines, DELWP has produced habitat importance maps for most threatened species in Victoria. These maps assign a score based on the relative importance of each location as habitat. The maps are used during detailed assessments to determine potential impacts on threatened species and to calculate required biodiversity offsets.

No species listed in the habitat importance maps were found to occur at this location. Given the highly modified condition of the site and the small area of impact, it is unlikely that any threatened species would be affected by the proposed development.

3.3.2 EPBC Act listed flora species

There are no threatened flora species known to occur within 5 km of the site based on the Protected Matters Search Tool (Department of the Environment and Energy, 2018). There were no species recorded on the site during the inspection.

Appendix 5 provides a discussion of the likelihood of rare or threatened flora species occurring within the site, based on habitat condition, species distribution, and known records within 5 km, using both the Victorian Biodiversity Atlas (VBA) and the Protected Matters Search Tool (PMST).

The proposed development is therefore unlikely to trigger requirements for referral under the Environment Protection and Biodiversity Conservation Act 1999 *(EPBC Act)* in relation to flora impacts.

3.3.3 Threatened floristic communities

The modelling undertaken using the Protected Matters Search Tool (PMST) suggests that four threatened ecological communities listed under the EPBC Act are likely to occur within 10 kilometres of the study area (Department of Agriculture, Water and the Environment 2021a). These communities are:

- White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland (Critically Endangered);
- Grassy Eucalypt Woodland of the Victorian Volcanic Plain (Critically Endangered); and
- Natural Temperate Grassland of the Victorian Volcanic Plain (Critically Endangered) and
- Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains (Critically Endangered)

The vegetation within the study area did not meet the condition thresholds that define any national or State-significant communities.

3.4 Fauna and Fauna Habitat

3.4.1 Fauna habitats and surrounding landscape

The study area is highly modified and provides limited fauna habitat. The site is dominated by introduced pasture grasses and weed species, with no remnant native vegetation patches, native canopy trees, waterbodies, waterways, dams or dense shrub layers present.

Habitat within the site is restricted to highly disturbed exotic grassland and weed-dominated vegetation, including Kikuyu (*Cenchrus clandestinus*), Coastal Galenia (*Aizoon pubescens*), Dwarf Nettle (*Urtica urens*), Panic Veldt-grass (*Ehrharta erecta*), Mediterranean Cabbage (*Brassica fruticulosa*) and Cocksfoot (*Dactylis glomerata*). Isolated occurrences of Pale Rush (*Juncus pallidus*) and Austral Rush (*Juncus australis*) occur in wetter areas toward the rear of the site but provide limited habitat value due to their sparse and discontinuous nature.

The site may be occasionally utilised by common and disturbance-tolerant fauna species typical of urban and peri-urban environments, including common birds foraging opportunistically within open grassed areas. However, the absence of native trees, shrubs, logs, hollows, water sources and structurally diverse vegetation significantly limits opportunities for nesting, shelter, breeding and refuge habitat.

The broader surrounding landscape is also highly modified and characterised by commercial, industrial and rural-residential land uses. While planted shelterbelt vegetation occurs on adjoining land, the subject site itself provides negligible habitat for significant fauna species.

3.4.2 Threatened fauna

A search of the Commonwealth Protected Matters Search Tool (PMST) and Victorian Biodiversity Atlas (VBA) identified a number of threatened fauna species previously recorded within the broader locality or considered likely to occur in the area.

The site is highly modified and dominated by introduced grasses, environmental weeds and disturbed vegetation associated with previous residential and commercial land use. No remnant native vegetation, tree hollows, wetlands, waterways or substantial areas of native understorey vegetation were identified within the proposed impact area. Accordingly, the site provides negligible habitat value for most threatened fauna species.

Latham's Snipe (*Gallinago hardwickii*) has previously been recorded within the broader locality, with 128 VBA records within 5 km of the study area. The species typically utilises shallow freshwater wetlands, marshes, inundated grasslands and dense wetland vegetation for foraging and shelter (DCCEEW, 2025). While isolated occurrences of *Juncus* spp. were recorded within the wetter northern portion of the broader site, these occur within highly modified vegetation in Stage 3 and do not constitute suitable wetland habitat. The proposed impact area does not support habitat characteristics typically associated with the species.

Given the highly modified nature of the site and absence of suitable habitat, the proposal is unlikely to result in impacts to threatened fauna species.

4.0 Legislation and Policy for the Protection of Biodiversity

The following section discusses policy and legislation from a national level through to the local level that relates to this study area and the impacts from the proposed use.

4.1 Environment Protection and Biodiversity Conservation Act 1999

The EPBC Act is the central piece of Commonwealth environmental legislation that provides a legal framework to protect and manage national and internationally important flora, fauna, ecological communities and heritage places. Matters of National Environmental Significance (MNES) which are addressed in this report under the Act include:

- Wetlands of international importance (listed as 'declared Ramsar wetlands');
- Listed threatened species and ecological communities; and
- Migratory species.

An assessment of impact and recommendations for these MNES is summarised below in Table 1

Table 1: Matters of National Environmental Significance

MNES	Potential impacts	Recommendations
RAMSAR wetlands	There were no wetlands of international importance (RAMSAR) identified to occur within the same catchment as the study area according to the PMST.	Referral not required.
Threatened species and ecological communities	The vegetation within the study area did not meet the condition thresholds that define any national or State-significant communities. Known to occur along road reserves within the region, where condition and size thresholds are satisfied. The size of impact is less than 0.5ha in size, therefore it did not meet the condition threshold.	Referral not required.
Migratory species	The study site is not considered to provide suitable habitat to support migratory species.	Referral not required.

Some areas of suitable habitat for listed species may exist on site. However, since the proposal is not impacting species or habitat for threatened species, communities or MNES listed under the EPBC Act, the EPBC Act is not triggered by this application.

4.2 Flora and Fauna Guarantee Act 1988 (FFG Act)

The Flora and Fauna Guarantee (FFG) Act is the primary Victorian biodiversity legislation governing management of publicly owned land and water bodies. The FFG Act identifies and protects threatened native plants, animals and ecological communities in Victoria and identifies threatening processes that impact on biodiversity. Any removal of FFG Act protected flora from public land, which includes

threatened flora species and the plants that make up threatened communities, requires a Protected Flora Licence or Permit under the Act, obtained from DEECA.

Recent changes to the FFG Act also mean that listed threatened Victoria flora and fauna species previously documented in Advisory Lists are now under the FFG Act. Impacts to FFG Act listed threatened flora and fauna species are generally dealt with using the habitat modelling as part of the native vegetation impact assessment. Native vegetation on site is not a FFG Act listed threatened ecological community, and does not contain protected flora species.

Relevance of FFG Act to this proposal:
The site is highly modified and does not support FFG Act listed threatened ecological communities or protected flora species. Historical vegetation removal within the site frontage and access area, including vegetation adjacent to the roadside reserve, is considered likely to have comprised planted and/or exotic species associated with previous residential land use rather than remnant indigenous vegetation. No removal of protected flora from public land is proposed as part of the current application and therefore a Protected Flora Permit under the FFG Act is not required.

4.3 Wildlife Act 1975 and Wildlife Regulations 2013

The Wildlife Act 1975 provides for the protection and conservation of native wildlife within Victoria. It also provides the basis for many wildlife permit/licensing requirements within the state. Under the Act a person must not hunt, take, or destroy endangered, notable, or protected wildlife.

Relevance of Wildlife Act and Wildlife Regulations to this proposal:
The Wildlife Act 1975 and the Wildlife Regulations 2013 are not triggered by this application.

4.4 Catchment and Land Protection Act 1994

The Catchment and Land Protection Act 1994 (CaLP Act) is the principal legislation governing the management and classification of noxious weeds and pest animals throughout Victoria. The Act aims to protect primary production, Crown land, the environment, and community health from the impacts of these species (Agriculture Victoria, 2021).

Under the CaLP Act, landowners and land managers are responsible for preventing the growth and spread of noxious weeds and for managing or, where required, eradicating pest animals and declared weeds. The Act categorises noxious weeds as State Prohibited, Regionally Prohibited, Regionally Controlled, *or* Restricted, each requiring specific management responses.

Relevance of the Catchment and Land Protection Act to this proposal
No declared noxious weeds listed under the Catchment and Land Protection Act 1994 (CaLP Act) were recorded within the study area during the site assessment. The site is highly modified and dominated by introduced pasture grasses and weed species; however, no species requiring management under the CaLP Act were identified. Accordingly, the proposal is unlikely to result in impacts relevant to the objectives of the CaLP Act.

4.5 Planning and Environment Act 1987

The Planning and Environment Act 1987 establishes the framework for planning land use, development and protection in Victoria. The Act provides for the fair, orderly, economic and sustainable use and development of land and includes objectives to protect ecological processes and natural systems.

4.5.1 Zoning and Overlays

The site is zoned Commercial 2 Zone (C2Z) and is affected by the following overlay:
• Design and Development Overlay – Schedule 32 (DDO32).

4.6 Clause 52.17 - Native Vegetation

The removal, destruction or lopping of native vegetation in Victoria requires a planning permit unless an exemption applies under Clause 52.17 or another provision of the Planning Scheme. Clause 73.01 of the Greater Geelong Planning Scheme defines native vegetation as “plants that are indigenous to Victoria, including trees, shrubs, herbs and grasses”.

The purpose of Clause 52.17 is to ensure there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation. This is achieved through the three-step approach outlined in the Guidelines for the removal, destruction or lopping of native vegetation (DELWP, 2017):

1. Avoid the removal, destruction or lopping of native vegetation.
2. Minimise impacts from the removal, destruction or lopping of native vegetation that cannot be avoided.
3. Provide an offset to compensate for the biodiversity impact if a permit is granted.

Relevance of Clause 52.17 to this proposal:

Based on the findings of this assessment, no native vegetation meeting the definition of a native vegetation patch or scattered tree occurs within the proposed impact area (Stages 1 and 2). Accordingly, the proposal will not result in the removal, destruction or lopping of native vegetation and does not trigger a permit requirement under Clause 52.17 of the Greater Geelong Planning Scheme.

4.7 Relevant Exemptions

Planted vegetation

Historical vegetation occurring along the frontage of the site and portions of the roadside reserve included species native to Victoria, including Giant Honey-myrtle (*Melaleuca armillaris*) and Narrow-leaved Paperbark (*Melaleuca linearifolia*). However, available historical imagery, surveyor photographs prepared by Smith Land Consulting (2024), adjoining ecological assessments and site context confirm these species formed part of planted screening and landscaping associated with previous residential land use rather than naturally occurring indigenous vegetation.

In accordance with Clause 52.17-7 of the Greater Geelong Planning Scheme, planted native vegetation is exempt from requiring a planning permit for removal and is not considered in offset calculations.

5.0 Native Vegetation Impact

No native vegetation meeting the definition of a native vegetation patch or scattered tree occurs within the proposed impact area (Stages 1 and 2). Historical vegetation removed in 2024 was determined to comprise planted and/or introduced vegetation. Accordingly, no native vegetation removal is proposed and offsets are not required.

5.1 Vegetation Cleared in the last 5 years

Assessment of vegetation removed during 2024 determined it comprised of planted, ornamental and/or introduced vegetation rather than remnant indigenous vegetation.

Review of historical aerial imagery (Google Earth) indicates no other vegetation clearing has occurred within the subject site during the five-year period preceding lodgement of the application.

6.0 Conclusion

Historical vegetation removed during 2024 is considered to have comprised planted, ornamental and/or introduced vegetation associated with previous residential land use rather than remnant indigenous vegetation.

Accordingly, the proposal will not result in the removal, destruction or lopping of native vegetation under Clause 52.17 and a planning permit for native vegetation removal is not required.

7.0 References

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Appendix 1 – Photos of the Site (2026)

Plate 1: View from the northern boundary looking south

Plate 2: View looking south at the western and eastern boundary which were cleared of planted vegetation

Plate 3: Isolated occurrences of Juncus sp. in the Stage 3 area unaffected by this proposal

Plate 4: Planted vegetation along the northern adjoining boundary

Plate 5: Southern frontage which was cleared of planted vegetation

Plate 6: Existing access on the southern frontage of the subject site

Appendix 2 – Historical Vegetation Photographs (2024 – Smith Land Consulting)

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Plate 8: Frontage along Murradoc Road

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Plate 12: Eastern boundary of the site and removed dwelling

Plate 13: Planted fruit trees surrounding the removed dwelling

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Plate 15: View from the eastern side of the site illustrating the vegetation on the western boundary

Plate 16: Flax-leaf Broom surrounding the old dwelling on the site

Plate 17: Planted Tuart tree and Tuart trees on the adjoining eastern land in the background

Plate 18: Exotic weeds looking in a southern direction from the northern boundary

Appendix 3 – Excerpt from Biodiversity Assessment for 83–89 Murradoc Road, Drysdale Identifying Eastern Boundary Tuarts as Planted Vegetation

This appendix provides corroborating evidence from a Biodiversity Assessment prepared by Beacon Ecological for the adjoining property at 83–89 Murradoc Road, Drysdale. The assessment identified the eastern boundary Tuart (*Eucalyptus gomphocephala*) trees adjoining the subject site as planted introduced vegetation and included photographic evidence of the Tuart windrow.

The report states:

"Planted introduced trees are present including a line of Tuart (*Eucalyptus gomphocephala*)..." (Beacon Ecological, 2021)

Plate 19 below provides an excerpt of the Tuart windrow identified within the adjoining study area.

Plate 19: Beacon Ecological photograph identifying planted Tuart windrow on adjoining eastern property"

Appendix 4 –Plant Species Recorded on Site (2026)

Scientific Name	Common Name	Origin
Aizoon pubescens	Coastal Galenia	Introduced
Brassica fruticulosa	Wild Turnip / Mediterranean Cabbage	Introduced
Bromus catharticus	Praire Grass	Introduced
Cenchrus clandestinus	Kikuyu	Introduced
Dactylis glomerata	Cocksfoot	Introduced
Ehrharta erecta	Panic Veldt-grass	Introduced
Juncus australis	Austral Rush	Native
Modiola caroliniana	Red-flower Mellow	Introduced
Juncus pallidus	Pale Rush	Native
Oxalis pes-caprae	Soursob	Introduced
Paspalum diatatum	Paspalum	Introduced
Plantago lanceolata	Ribwort Plantain	Introduced
Rumex pulcher	Fiddle Dock	Introduced
Sporobolus africanus	Rat's-tail Grass	Introduced
Urtica urens	Dwarf Nettle	Introduced
Vulpia spp.	Vulpia / Fescue Grass	Introduced

Appendix 5 – VBA / PMST Species Summary

EPBC Act	FFG Status	Occurrence Likelihood
EX – Extinct **CR – Critically Endangered** **EN – Endangered** **VU – Vulnerable**	**Conservation Status in Victoria only**	**Low – Unlikely based on not enough habitat and no recent sighting records** **Moderate – Has low numbers of sighting records and has limited or degraded habitat** **High – Recent sighting records in the area and contains good habitat or conditions to support its growth or survival** **Known – Recorded sightings on the study site (within the last 10 years)** ***NB: This list does not include migratory or marine or fish species from the PMST***

FLORA							
Scientific Name	**Common Name**	**FFG Status**	**EPBC Status**	**Sightings Count**	**Year of last record**	**Occurrence Likelihood**	**Comment**
Amphibromus fluitans	River Swamp Wallaby-grass		VU			Low	Largely confined to permanent swamps mainly along the Murray River between Wodonga and Echuca. Prefers moist soils that tolerate inundation. This site does not support its habitat
Dianella amoena	Matted Flax-lily		EN	1	2012	Low	Inhabits grassland and grassy woodland ecosystems, often on volcanic soils. This site is not suitable.
Dodonaea procumbens	Trailing Hop-bush		VU			Low	In Victoria the species is confined largely to the south-west of the State, between Castlemaine and Dergholm and south to about Cressy (Duretto 1999), in the. It grows in low-lying often winter-wet areas in woodland low open-forest and grasslands on sands and clays. This site does not support this habitat.
Eucalyptus crenulata	Buxton Gum		En	11	2015	Moderate	It is endemic to Victoria, growing around the regions of Buxton, Yarra Glen and Narbethong to the north-east of Melbourne. It forms part of dry sclerophyll woodland in swampy sites. This site may be suitable.
Glycine latrobeana	Clover Glycine		VU			Moderate	Occurs in grassy woodland; plains grassland. box woodland; dry sclerophyll forest. This site may be suitable
Grevillea bedggonodiana	Enfield Grevillea		VU			Low	The Enfield Grevillea has a very limited distribution across Victoria, only being found in a small area of reserved forested land in the Enfield State Park, Ross Creek State Forest and Linton/Nawnight-widwid State Forest about 30 km south of Ballarat.
Lepidium aschersonii	Spiny Peppercress		VU			Low	Almost all sites occur about 100–200 km west of Melbourne, mostly within the area bordered by Mortlake, Cressy, Colac and Ararat. It occurs in periodically wet sites and the margins of freshwater and saline marshes and shallow lakes, usually on heavy clay soil (Harris & Smith 2000). Almost all sites receive some degree of soil waterlogging or seasonal flooding.
Lepidium hyssopifolium	Basalt Pepper-cress, Peppercress		EN			Low	Habitat is regrowth woodland on granite ridge country that has retained a high diversity of plant species, including other orchids. This site does not support this habitat
Pimelea spinescens subsp. spinescens	Spiny Rice-flower	Critically Endangered	CR	1	1990	Low	Spiny rice-flower is endemic to Victoria, where it occurs in the central west of the state (Walsh & Entwisle 1996); predominantly in the Victorian Volcanic Plain, Victorian Midlands and Riverina IBRA (Interim

							Biogeographic Regionalisation for Australia) Bioregions Grows in grassland, open shrubland and occasionally woodland often on basalt derived soils.
Pterostylis chlorogramma	Green-striped Greenhood		VU			Low	The green-striped leafy greenhood grows in heathy and shrubby forests near the Victorian coast between Yarram and Edenhope.
Pterostylis cucullata	Leafy Greenhood		VU			Low	The green-striped leafy greenhood grows in heathy and shrubby forests near the Victorian coast between Yarram and Edenhope.
Rutidosis leptorhynchoides	Button Wrinklewort		EN			Low	Occurs in a wide variety of grassland, woodland and forest habitats, generally on relatively heavy soils. Can occur in modified habitats such as semi-urban areas and roadsides. Highly dependent on the presence of bare ground for germination. No suitable site.
Senecio macrocarpus	Large-headed Fireweed	Critically Endangered	VU			Low	Senecio macrocarpus has been collected extensively from western Victoria and occurs in grassland, sedgeland, woodland and shrubland, generally on relatively heavy soils
Thelymitra epipactoides	Metallic Sun-orchid		EN			Low	Occurs in small to extensive numbers in fertile loams in open forest, open heathland, or grassland. This site is not suitable
Thelymitra orientalis	Hoary Sun-orchid		CR			Low	Localised in Victoria. Grows in drier forests and woodlands on well-drained shallow clay loam. This site would not be suitable.
FISH							
Scientific Name	**Common Name**	**FFG Status**	**EPBC Status**	**Sightings Count**	**Year of last record**	**Occurrence Likelihood**	**Comment**
Nannoperca obscura	Yarra Pygmy Perch		EN			Low	There are records from 42 locations, extending from Dandenong Creek in Victoria through to Lake Alexandrina near the mouth of the Murray River in South Australia. Prefers slow-moving or still waters, such as pools in rivers and streams or in lakes and sites which have abundant submerged and emergent aquatic vegetation, sometimes with wood debris. (DEH 2005; Lintermans 2007; Hammer et al. 2010;). No flowing water, so no suitable habitat.
Prototroctes maraena	Australian Grayling		VU			Low	These fish occur in coastal drainages from the Hopkins River eastwards and prefer rivers and streams with a cool, clear, moderate flow, with a gravel substrate and alternating pools and riffles. No flowing water, so no suitable habitat.
BIRD							
Scientific Name	**Common Name**	**FFG Status**	**EPBC Status**	**Sightings Count**	**Year of last record**	**Occurrence Likelihood**	**Comment**
Anthochaera phrygia	Regent Honeyeater		CR			Low	Found in box ironbark eucalypt forests and woodland and strongly nomadic. Across Australia there are only about 800 to 1500 Regent Honeyeaters in the wild, with about 100 of these remaining in Victoria.

Aphelocephala leucopsis	Southern Whiteface		VU			Moderate	Prefers drier foothills north of the divide and inland shrubs of the mallee, especially areas with fallen timber or dead trees and stumps. This site could support its habitat.
Arenaria interpres	Ruddy Turnstone	Endangered	VU			Low	This species is a migratory shorebird typically associated with coastal and estuarine habitats, favouring rocky shorelines, mudflats, and sandy beaches. Although the Ruddy Turnstone may occasionally be recorded at large inland lakes or wetlands during migration, no suitable foraging or roosting habitat occurs on or near the site.
Botaurus poiciloptilus	Australasian Bittern		EN			Low	Lives in freshwater wetlands and dense beds of reeds which are not found on this site.
Calidris acuminata	Sharp-tailed Sandpiper		VU			Low	They are found mostly in the south-east and are widespread in both inland and coastal locations. The species also occurs in both freshwater and saline habitats (Cramp 1985; Higgins & Davies 1996).
Calidris canutus	Red Knot	Endangered	VU			Low	Summer migrants to Victoria from Arctic breeding grounds (Aug-April). This species is found in a range of wetland habitats; tidal mudflats, saltmarsh, salt fields, fresh to saline wetlands, both coastal (most) and inland. Also visits sewage ponds (Pizzey & Knight 2007).
Calidris ferruginea	Curlew Sandpiper	Critically Endangered	CR			Low	Generally occupies littoral and estuarine habitats and mainly found in intertidal mudflats and sheltered coasts.
Calidris tenuirostris	Great Knot	Critically Endangered	VU			Low	Summer migrants to Vic. From breeding grounds in Siberia. Occasionally, small numbers stay overwinter. Flocks occur regularly on intertidal mudflats in Port Phillip Bay and Corner Inlet. Small numbers occasionally seen elsewhere along coast or, rarely, at inland sites. Often associate with other Knots. Feed from soft mud or sand in shallow water.
Callocephalon fimbriatum	Gang-gang Cockatoo	Endangered	EN			Low	In summer they occur in tall mountain woodland with thick shrubby understories and in winter they move to the lower altitudes and try forests. This site could support it in the winter months.
Charadrius mongolus	Lesser Sand Plover	Endangered	EN			Low	Summer migrants to Vic from their northern hemisphere breeding grounds. Usually coastal, in littoral and estuarine environments; rarely inland around terrestrial wetlands
Climacteris picumnus victoriae	Brown Treecreeper (south-eastern)		VU	1	2003	Low	Found in the drier open forests and woodlands, the Brown Treecreeper stays in the same area all year round
Falco hypoleucos	Grey Falcon		VU			Low	Prefers woodland, scrub, shrubland and grassland types in arid and semi-arid zones. This site does not have suitable habitat.
Gallinago hardwickii	Latham's Snipe		VU	3	1980	Low	Latham's snipe is a non-breeding visitor to found in all regions of Victoria except for the north-west (Blakers et al. 1984; Emison et al. 1987; Barrett et al. 2003) and feed in soft mudflats or shallow water typically at night, early morning, or evening (BirdLife Australia 2021). Habitat not suitable

Grantiella picta	Painted Honeyeater		VU			Low	Records in Central Victoria are very few and generally where there is abundant mistletoe. There is no mistletoe in the study area
Hirundapus caudacutus	White-throated Needletail	Vulnerable	VU	2	2021	Low	Aerial insectivore that rarely lands to perch, often sleeping on the wing. This site is not suitable.
Lathamus discolor	Swift Parrot	Critically Endangered	CR			Low	Winter migrant from Tasmania. Generally, prefers Box Ironbark forests and woodlands inland of the Great Dividing Range during winter. They are nomadic, and follow the flowering of trees and psyllid infestations. In Victoria their distribution is centred on box-ironbark forests, but they are often seen in town parks and occur sporadically elsewhere in dry forests, dry woodlands and wooded farmlands but are seldom seen in treeless areas, rainforests or wet forests (Higgins 1999; Pizzey and Knight 2007). Feed mainly in winter-flowering plants, especially Red Ironbark's and ornamental trees and shrubs (Higgins 1999; Swift Parrot Recovery Team 2001).
Limosa lapponica baueri	Nunivak Bar-tailed Godwit		EN			Low	Habitat in tidal mudflats, estuaries, sewage ponds, shallow river margins, brackish or saline inland lakes, flooded pastures and airfields. Widespread summer migrant mostly along coasts to e. Aust and Tas (Sept-April)(Pizzey and Knight 2012).
Limosa limosa	Black-tailed Godwit	Critically Endangered	EN			Low	Summer migrant to Australia (Sept-May) but scarce in Southern Australia. Use tidal mudflats, estuaries, sandpits, shallow river margins, sewage ponds; inland on large shallow fresh or brackish waters (Pizzey and Knight 2007).
Meanodryas cucullata	Hooded Robin	Vulnerable	En	1	1971	Low	In Victoria, the Hooded Robin is typically associated with dry open woodlands and forests that have a grassy or shrubby understorey and a relatively open ground layer. Site not suitable
Neophema chrysogaster	Orange-bellied Parrot	Critically Endangered	CR			Low	Breeds in south west Tasmania and are winter migrants to Victoria where they are usually present from late March to early Nov, inhabiting coastal habitats such as bays and estuaries in saltmarshes, herb land or low shrublands (Higgins 1999).
Neophema chrysostoma	Blue-winged Parrot		VU			Low	Range in habitat from coastal, sub-coastal, inland areas to arid zones. They favour grasslands and grassy woodlands and are often found near wetlands. The trees may support them.
Numenius madagascariensis	Eastern Curlew	Critically Endangered	CR			Low	Common summer migrant to Australia (Aug-May) (Pizzey and Knight 2007). Sheltered coasts, especially estuaries, embankments, harbours, inlets and coastal lagoons, with large intertidal mudflats or sandflats. Mainly forages on soft sheltered intertidal sandflats or mudflats, open and without vegetation; also on salt flats and in saltmarsh (Higgins and Davies 1996).
Pluvialis squatarola	Grey Plover	Vulnerable	VU			Low	Summer migrants to Vic from their breeding grounds in the Arctic (Pizzey and Knight 2007). Almost entirely coastal with some records on inland

							wetlands. Habitat includes marine shores, inlets, estuaries and lagoons near intertidal mudflats or sandflats for feeding. Roosts on unvegetated sandbanks or spits on beaches and lagoons and estuaries (Marchant and Higgins 1993).
Rostratula australis	Australian Painted Snipe		EN			Low	Inhabits many different types of shallow, brackish, or freshwater wetlands, especially temporary ones with muddy margins. This site does not support any wetlands
Stagonopleura guttata	Diamond Firetail		VU			Moderate	The Diamond Firetail is a small, seed-eating finch that inhabits grassy open woodlands, lightly timbered farmland, and box–ironbark forests. It prefers mosaics of native grassy ground cover interspersed with scattered trees and shrubs, which provide nesting opportunities and access to water nearby. Site could be suitable
Sternula albifrons	Little Tern	Critically Endangered	VU			Low	The Little Tern is both a breeder and migrant visitor to Australia. It mainly inhabits sheltered coastal waters; as it mostly forages in shallow waters in bays, inlets, estuaries, lakes, and lagoons - if out at sea, usually not further than 50m. This species particularly favours habitat with exposed sandpits, sandbanks, or ocean beaches nearby (Higgins and Davies 1996; Pizzey and Knight 2007).
Sternula nereis	Fairy Tern	Critically Endangered				Low	Mostly sheltered coastal embayments, including harbours, lagoons, inlets, bays, estuaries and on ocean beaches. Also fresh or saline near-coastal terrestrial wetlands, including lakes and salt-ponds. Nests above high-water mark on sheltered beaches, spits, bars, banks and ridges, usually of sand but also of shell-grit or coral; either on mainland or on inshore islands (Higgins and Davies 1996).
Tringa nebularia	Common Greenshank	Endangered		1	1977	Low	Common Greenshanks are found both on the coast and inland, in estuaries and mudflats, mangrove swamps and lagoons, and in billabongs, swamps, sewage farms and flooded crops.
MAMMAL							
Scientific Name	**Common Name**	**FFG Status**	**EPBC Status**	**Sightings Count**	**Year of last record**	**Occurrence Likelihood**	**Comment**
Antechinus minimus maritimus	Swamp Antechinus (mainland)		VU			Low	Swamp Antechinus habitat is typically wet heath, heathy woodland, sedgeland and dense tussock grassland, rarely above 200m (DE 1996, Menkhorst 2004). This site is not suitable
Dasyurus maculatus	Spot-tailed Quoll,		EN			Low	The Spot-tailed Quoll occupies a range of forest habitats, particularly wet eucalypt forests associated with rocky outcrops, extensive riparian vegetation and high levels of ground dwelling prey.
Isoodon obesulus obesulus	Southern Brown Bandicoot	Endangered	EN			Low	The Southern Brown Bandicoot has a patchy distribution. It is found in southern coastal Victoria and the Grampian Range There are strong associations between habitat quality and fire events for this species with

							favourable characteristics being a mosaic of small scale burnt areas undergoing different stages of post fire renewal.
Petaurus australis australis	Yellow-bellied Glider (south-eastern)					Low	In Vic, 75 percent of all yellow-bellied glider (south-eastern) records are in the eastern portion of the state, extending from the east coast to Melbourne and Port Philip bay. The subpopulations in the region of the Vic–SA border are isolated from the main distribution (Carthew 2004; Reese et al. 2007). These isolated western subpopulations comprise 25 percent of Victorian records and include subpopulations around Edenhope, Portland, Timboon, and the Otway Ranges (Reese et al. 2007).
Pteropus poliocephalus	Grey-headed Flying-fox	Vulnerable	VU			Low	Roost sites commonly occur in gullies, in vegetation with dense canopy cover and close to water.
REPTILE							
Scientific Name	**Common Name**	**FFG Status**	**EPBC Status**	**Sightings Count**	**Year of last record**	**Occurrence Likelihood**	**Comment**
Delma impar	Striped Legless Lizard, Striped Snake-lizard		VU			Low	Found in central and south-western Victoria. The striped legless lizard is a grassland specialist, found only in areas of native grassland and nearby grassy woodland and exotic pasture.
Lissolepis coventryi	Swamp Skink, Eastern Mourning Skink		EN			Low	The Swamp Skink is mainly found within the southern half of Victoria with the population at the Grampians being the most northern. It is often restricted to densely vegetated swamps and associated watercourses, and adjacent wet heaths (Melaleuca or Leptospermum thickets), sedgelands and saltmarshes (Clemann 2000, SAC 2000, Manning 2002). It can occur in association with freshwater and saltmarsh environments.
AMPHIBIAN							
Scientific Name	**Common Name**	**FFG Status**	**EPBC Status**	**Sightings Count**	**Year of last record**	**Occurrence Likelihood**	**Comment**
Litoria raniformis	Growling Grass Frog	Vulnerable	VU	9	2020	Low	Primarily needs still or slow-moving water with mats of floating and submerged plants which are present on the dam. There are dams on this site but they don't support their habitat requirements.