City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

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RE: Biodiversity assessment at 95 Murradoc Road, Drysdale, Victoria.

[redacted] to undertake a biodiversity assessment at 95 Murradoc Road, Drysdale, Victoria. The entire site is proposed to be disturbed as part of an industrial development.

The development will result in the removal, destruction and lopping of scattered native groundcover species providing less than 25% vegetative cover as such will require a permit under Victoria's Planning and Environment Act (PE Act) 1987. As per Clause 52.17 of the PE Act, the application has been classed as a basic assessment pathway. In this instance the Department of Energy, Environment and Climate Action (DEECA) is not a recommending authority and there are no offset requirements.

Study Area

The study area is located at 95 Murradoc Road, Drysdale, Victoria and is 6,161 square metres. The study area is located within Commercial 2 Zone (C2Z) of the City of Greater Geelong Planning Scheme and covered by a Design and Development Overlay (DDO 32) and Protected Settlement Boundary (PSB), (DTP 2026). The study area is also located within the Otway Plain Bioregion, Corangamite Catchment and is modelled as Location 1 on the Department of Energy, Environment and Climate Action (DEECA) location risk mapping (DEECA 2026a).

Methodology

Background review

Relevant literature, such as Bioregional Ecological Vegetation Class (EVC) Benchmarks and national/state/local policies and legislation were also reviewed as part of the investigation (DEECA 2026a, DEECA 2026b).

The following were also reviewed:

- *Preliminary Arboricultural Report. 95 Murradoc Road, Drysdale* [redacted] Arboriculture 2026)
- *Proposed Site Plan, 95 Murradoc Road, Drysdale* ([redacted] 2026)

Field Assessment

[redacted]

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

A field assessment was undertaken within the study area by qualified botanist, [redacted] on 22 September 2026. The study area was traversed with naturally occurring flora taxa within the study area noted. Plant taxonomy follows the Victorian Biodiversity Atlas (VBA) (DEECA 2026b). To determine extent of native vegetation, remnant patch or scattered trees were used as per *Guidelines for the removal, destruction or lopping of native vegetation* (DEECA 2025) and defined below:

Patch

A patch of native vegetation is:

- An area of vegetation where at least 25 per cent of the total perennial understorey 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 in DELWP systems and tools.

Scattered tree

A scattered tree is:

- A native canopy tree that does not form part of a patch.

Applications to remove native vegetation are categorised into one of three assessment pathways with corresponding application requirements and decision guidelines.

- Basic: limited impacts on biodiversity.
- Intermediate: could impact on large trees, endangered EVCs, and sensitive wetlands and coastal areas.
- Detailed: could impact on large trees, endangered EVCs, sensitive wetlands and coastal areas, and could significantly impact on habitat for rare or threatened species.

Results

Flora species

The field visit identified 29 species occurring within the study area. Of these, four are considered native species and 25 introduced. See Appendix 1 for a list of species recorded within the study area.

No nationally or state significant flora species were noted within the study area during the assessment.

No introduced species noted within the study area is listed as regionally controlled noxious weeds within the Corangamite Catchment (DPI 2008).

Vegetation modelling

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

Pre-1750 (prior to European settlement) EVC modelling indicates that the study area is likely to have been dominated by Plains Grassy Woodland (EVC 55). 2005 (extant) mapping indicates that the majority of the study area is likely to be devoid of native vegetation with some modelled in the south (DEECA 2026a).

Vegetation Assessment

The field visit revealed that study area is highly modified and dominated by planted generally non-locally indigenous trees over a predominantly introduced groundcover introduced ground covers particularly Kikuyu *Cenchrus clandestinus,* Soursob *Oxalis pes-caprae* and Cape Weed *Arctotheca calendula* (Plate 1). Other introduced species include Carpet Weed *Aizoon pubescens,* Panic Veldt-grass *Ehrharta erecta,* Jo Jo *Soliva sessilis,* Chickweed *Stellaria media* and White Clover *Trifolium repens* var. *repens.* Planted trees and shrubs include Brittle Gum *Eucalyptus mannifera,* English Oak *Quercus robur,* Southern Mahogany Gum *Eucalyptus botryoides,* Yellow Gum *Eucalyptus leucoxylon* 'rosea', Tuart *Eucalyptus gomphocephala,* Sugar Gum *Eucalyptus cladocalyx.* Native planted trees include Ironbark *Eucalyptus tricarpa,* River Red Gum *Eucalyptus camaldulensis* and Black Wattle *Acacia mearnsii.*

Native scattered groundcover species providing less than 25% vegetative cover includes Spreading Crassula *Crassula decumbens* var. *decumbens,* Sieber Crassula *Crassula sieberiana,* Weeping Grass *Microlaena stipoides* var. *stipoides* and Wallaby Grass *Rytidosperma* spp.



Plate 1. Introduced vegetation within the study area.

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

Relevant Legislation and Policies

The following policies and legislation were taken into consideration during the assessment.

National

Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The EPBC Act 1999 is the central piece of national environmental legislation in Australia. The Act provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places — defined in the Act as matters of national environmental significance.

Implications: Given the highly modified nature of the study area, the proposed works are unlikely to pose a significant impact on any matters of national significance. A referral under the EPBC Act is not required.

State

The Flora and Fauna Guarantee Act 1988 (FFG Act)

The FFG Act is the key state legislation for the conservation of threatened species and communities and for the management of potentially threatening processes. The FFG Act provides for the listing of taxa and communities of flora and fauna that are threatened; potentially threatening processes; and flora that have legal protection. A permit is required from DEECA if an action on public land proposes to collect, kill, injure or disturb protected flora.

Implications: As the proposed works are not on public land and no FFG Act values are proposed to be impacted, a permit under the FFG Act is not required from DEECA.

Planning and Environment Act 1987 (PE Act)

The PE Act establishes a framework for planning the use, development and protection of land in Victoria. The PE Act provides for the Minister to prepare a set of standard provisions for municipal planning schemes called the Victoria Planning Provisions (VPP).

Under Clause 52.17 of the VPP a planning permit is required from the responsible authority (local council) to remove, destroy or lop native vegetation on land unless the action is exempt. Clause 52.17 also specifies that applications must also be classified as basic, intermediate or detailed assessment pathway as defined in the Guidelines for the removal, destruction or lopping of native vegetation (DEECA 2025).

Implications: A permit to remove native vegetation (scattered native groundcover) from the City of Greater Geelong is required under *Clause 52.17 Native Vegetation*. As per Clause 52.17 of the Planning and Environment Act 1987 the application has been classed as a basic assessment pathway as only scattered native understorey plants are proposed to be impacted. Application information requirements of this pathway are detailed below in Table 1. In this instance DEECA is not considered a recommending authority.

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

Note that planted locally indigenous tree species are present within the study area, including River Red Gum, Ironbark and Black Wattle. However, based on their age, regular spacing, association with landscaped plantings and similar age structure to adjacent non-native planted trees and shrubs, these individuals are considered planted specimens and are therefore exempt from permit requirements under Clause 52.17-7 (Planted vegetation).

Table 1. Application requirements and responses for proposed vegetation (Scattered native groundcover) clearance under the basic assessment pathway.

#	Application Requirement	Response
1	Information about the native vegetation to be removed, including:	
	The assessment pathway and reason for the assessment pathway. This includes the location category of the native vegetation to be removed.	**Basic Assessment Pathway** Scattered native groundcover plants providing less than 25% vegetative cover are proposed to be impacted.
	A description of the native vegetation to be removed that includes: • Whether it is a patch or a scattered tree (or both). • The extent (in hectares). • The number and circumference (in centimetres measured at 1.3 metres above ground level) of any large trees within a patch. • The number and circumference (in centimetres measured at 1.3 metres above ground level) of any scattered trees, and whether each tree is small or large. • The strategic biodiversity value score • The condition score. • If it includes endangered Ecological Vegetation Classes. • If it includes sensitive wetland or coastal areas.	Only scattered native groundcover plants providing less than 25% vegetative cover are proposed to be impacted.
	Maps showing the native vegetation and property in context and containing: • Scale, north point and property boundaries • Location of any patches of native vegetation and the number of large trees within the patch proposed to be removed • Location of scattered trees proposed to be removed, including their size	No patches or scattered native trees were noted within the study area.

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

#	Application Requirement	Response
	The offset requirement, determined in accordance with section 5 of the Guidelines, that will apply if the native vegetation is approved to be removed	• There are no offset requirements.
2	Topographic and land information relating to the native vegetation to be removed, showing ridges, crests and hilltops, wetlands and waterways, slopes of more than 20 percent, drainage lines, low lying areas, saline discharge areas, and areas of existing erosion, as appropriate. This may be represented in a map or plan.	The native vegetation proposed to be removed is on flat topography less than 20 percent. There are no saline discharge or erosion areas.
3	Recent, dated photographs of the native vegetation to be removed.	See the results section of this report.
4	Details of any other native vegetation approved to be removed, or that was removed without the required approvals, on the same property or on contiguous land in the same ownership as the applicant, in the five year period before the application for a permit is lodged.	No other native vegetation has been approved to be removed, or was removed without the required approvals, on the same property or on contiguous land in the same ownership as the applicant, in the five year period before the application for a permit is lodged.
5	An avoid and minimise statement. The statement describes any efforts to avoid the removal of and minimise the impacts on the biodiversity and other values of native vegetation, and how these efforts focussed on areas of native vegetation that have the most value. The statement should include a description of the following: • Strategic level planning – any regional or landscape scale strategic planning process that the site has been subject to that avoided and minimised impacts on native vegetation across a region or landscape • Site level planning – how the proposed use or development has been sited or designed to avoid and minimise impacts on native vegetation. • That no feasible opportunities exist to further avoid and minimise impacts on native vegetation without undermining the key objectives of the proposal.	*Strategic Level Planning:* The study area is located within Commercial 2 Zone with no overlays protecting ecological values. *Site Level Planning:* The development is located at a site generally devoid of remnant, native ecological values.
6	A copy of any Property Vegetation Plan contained within an agreement made pursuant to section 69 of the Conservation, Forests and Lands Act 1987 that applies to the native vegetation to be removed.	No Property Vegetation Plan applies to the study area.
7	Where the removal of native vegetation is to create defendable space, a written statement explaining why the removal of native vegetation is necessary. This statement must	The removal of native vegetation is to not create defendable space in conjunction with an application under the Bushfire Management Overlay.

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

#	Application Requirement	Response
	have regard to other available bushfire risk mitigation measures. This statement is not required when the creation of defendable space is in conjunction with an application under the Bushfire Management Overlay.	
8	If the application is under Clause 52.16, a statement that explains how the proposal responds to the Native Vegetation Precinct Plan considerations at decision guideline 8.	The application is not under Clause 52.16.
9	An offset statement providing evidence that an offset that meets the offset requirements for the native vegetation to be removed has been identified and can be secured in accordance with the Guidelines. A suitable statement includes evidence that the required offset: • Is available to purchase from a third party, or • Will be established as a new offset and has the agreement of the proposed offset provider, or • Can be met by a first party offset	There are no offset requirements.

Local and Regional

Planning Scheme

Each municipality in Victoria is covered by a planning scheme, which sets out policies and provisions for the use, development and protection of land (zones and overlays). They are legal documents, sourced and constructed according to the VPP, prepared by the local council or Minister and approved by the Minister.

Implications: No overlays pertaining to ecological values cover the study area.

Further Requirements

The following actions are required as part of the proposed works:

- **A permit to remove native vegetation from the City of Greater Geelong** is required under *Clause 52.17 Native vegetation*. As per Clause 52.17 of the PE Act, the application has been classed as a *basic assessment pathway*. In this instance DEECA is not a recommending authority and there are no offset requirements.

Please do not hesitate to contact me if you have any questions or comments.

Warm regards,

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

References

DEECA 2026a. *Nature Kit* www.deeca.vic.gov.au Department of Energy, Environment and Climate Action

DEECA 2026b. *Victorian Biodiversity Atlas.* www.vba.deeca.vic.gov.au. Department of Energy, Environment and Climate Action

DEECA 2025. *Guidelines for the removal, destruction or lopping of native vegetation*. Published by the Department of Energy, Environment and Climate Action

DTP 2026. *VicPlan website* www://mapshare.vic.gov.au/vicplan. Department of Transport and Planning website.

Preliminary Arboricultural Report. 95 Murradoc Road, Drysdale.

. *Proposed Site Plan, 95 Murradoc Road, Drysdale.*

City of Greater Geelong, Statutory Planning - Date Received 08/10/2026

Appendix 1. Flora list (naturally occurring species only)

Notes: CaLP – denotes Catchment and Land Protection Act *regionally controlled* listed weed within the Corangamite Catchment.
- Native to Australia but located outside natural distribution.

Scientific Name	Common Name
NATIVE SPECIES	
Crassula decumbens var. *decumbens*	Spreading Crassula
Crassula sieberiana s.l.	Sieber Crassula
Microlaena stipoides var. *stipoides*	Weeping Grass
Rytidosperma spp.	Wallaby Grass
INTRODUCED SPECIES	
Acacia baileyana	Cootamundra Wattle
Aizoon pubescens	Galenia
Arctotheca calendula	Cape Weed
Cenchrus clandestinus	Kikuyu
Cerastium glomeratum s.l.	Common Mouse-ear Chickweed
Coprosma repens	Mirror Bush
Cotyledon orbiculata	Pig's Ear
Cynodon dactylon var. *dactylon*	Couch
Ehrharta erecta	Panic Veldt-grass
Ehrharta longiflora	Annual Veldt-grass
Erigeron bonariensis	Flaxleaf Fleabane
Galium aparine	Cleavers
Genista linifolia	Flax-leaf Broom
Oxalis pes-caprae	Soursob
Oxalis purpurea	Large-flower Wood-sorrel
#Pittosporum undulatum	Sweet Pittosporum
Poa annua s.l.	Annual Meadow-grass
Psoralea pinnata	Blue Psoralea
Solanum nigrum s.l.	Black Nightshade
Soliva sessilis	Jo Jo
Sonchus oleraceus	Common Sow-thistle
Stellaria media	Chickweed
Trifolium repens var. repens	White Clover
Urtica urens	Small Nettle
Viola odorata	Common Violet