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E. [REDACTED]

Justin Harding, Planner

Mitchell Shire Council,
113 High Street,
Broadford 3658

Proposed Planning Scheme Amendment C151

Dear Sir,

Mitchell Environment Group has been requested by KADRRA to consider the proposal of Amendment C151 to the Kilmore Structure Plan, specifically with respect to the Vegetation Protection Overlay VPO along Quinns Road, Kilmore.

We acknowledge that public submissions are due by 26th June. However, C151 is still a work in progress.

I have personally visited the site and checked the trees along Quinns Road, and observed the degraded grassland to the immediate west of the one chain road tree corridor.

BEAM supports the concerns raised by Anne Rose in her **KADRRA** presentation to Council on Monday August 10th. We have no issue with the proposal to rezone the land to facilitate a housing development, but **we take strong issue with the D-VPO1 deletion of part of the Vegetation Protection Overlay VPO.**

In the Kilmore Structure Plan at <https://engagingmitchellshire.com/kilmore-structure-plan/widgets/73417/documents> p.134 clearly states that the trees along Quinns Road should be protected. David Atkinson (pre Councillor) and Peter Mitchell, ecologist and BEAM committee member, noted this in their submission on the draft plan, and also requested that, where any road reserves had large old trees, that roads and other infrastructure should be outside the road reserve and that the trees be protected as public conservation land or privately with covenants.

BEAM understands that NO ENVIRONMENTAL ASSESSMENT has been made of this VPO area proposed to be deleted. It is untenable that a planning decision can be adequately made about a VPO without an appropriate science-based assessment. BEAM suggests that eliminating this VPO area will compromise the effective conservation of the Quinns Road reserve vegetation, notably the aged trees.

In the absence of such a formal study, with our collective experience in conservation challenges with remnant vegetation BEAM suggests the following compromise position to protect the road reserve vegetation into the future:

The VPO should be retained for the full length of Quinns Road with a 30m buffer in the development site adjacent to the road reserve (west side). Whilst this is a significant reduction to the current VPO, the 30m would offer a level of protection for the root zone of the Quinns Road trees, ensure any trees that may be blown down in a storm don't impact on the future housing adjacent, and would also facilitate an area to regenerate with native understorey vegetation if carefully managed in the subsequent development. This 30m VPO as a compromise position should ensure the health of the vegetation along the road reserve.

Quinns Road could be a great N-S corridor in an area where the paddocks are bare and eroding. But any corridor- to be effective and not dominated by edge effects (including the bulldozing of the site close to the roots)- needs to be well beyond the drip line of the trees.

BEAM is adamant that remnant vegetation has values that cannot be protected and enhanced with minimal protection zones. In particular, older trees are effectively irreplaceable habitat for many species facing the extinction crisis. Their retention should receive the highest consideration when planning urban developments.

This C151 amendment has been requested by the developer Wandong Kilmore P/L, and they want to maximise their saleable land, as every developer does. Like every developer, they make their money here but live elsewhere, and fail to appreciate the amenity virtues of remnant vegetation and the role that this plays in biodiversity, connecting areas of larger vegetation population and creating recreational space with an Australian integrity.

All too often we replace nature with a very poor substitute and even that takes centuries to develop into usable habitat.

In a nutshell, the D-VPO1 should be adjusted to keep a 30m western buffer to the road reserve.

Sincerely,

Peter Lockyer
president BEAM Mitchell Environment Group
13 aug 2020