



Friends of Moonee Ponds Creek Inc

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To ensure the preservation, restoration, environment protection and ecologically sensitive development and maintenance of the Moonee Ponds Creek and adjoining catchment areas.

May 6, 2022

Statutory Planning Services
Planning Department
Department of Environment, Land, Water and Planning
Attention: Danielle Foster, Planner | Priority Projects
development.approvals@delwp.vic.gov.au

RE: APPLICATION NO. PA 2201532
ADDRESS OF LAND: 385-401 FOOTSCRAY ROAD, DOCKLANDS VIC 3008

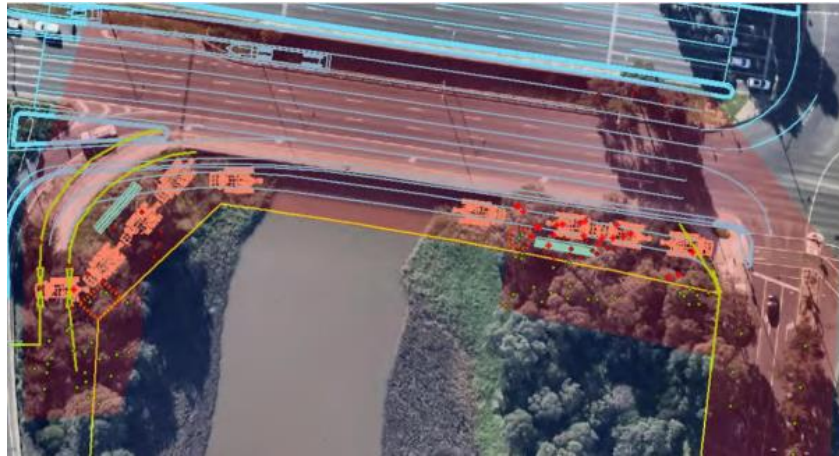
**APPLICATION: EXTENSION OF WGTP PROJECT BOUNDARY – BRIDGE 90
REMOVAL OF EXISTING NATIVE VEGETATION**

The Friends of Moonee Ponds Creek would like to lodge an objection to the above permit application PA 2201532. The grounds of our objection are:

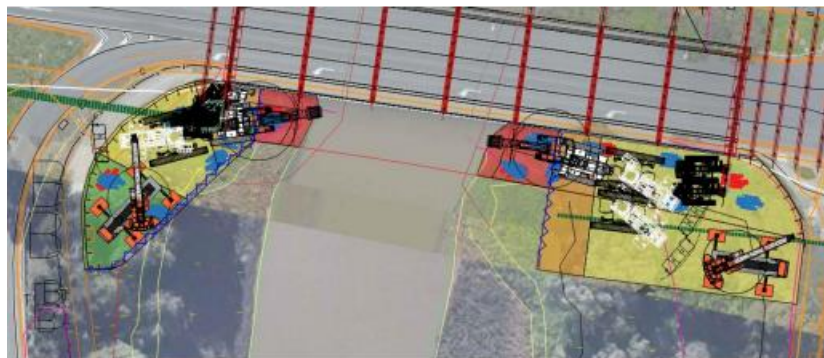
- The WGTP underwent an extensive EES process, at which the project boundaries were clearly defined, including the Footscray Road Bridge (Bridge 90) over the Moonee Ponds Creek, and detailed plans were provided, including the new shared bicycle/pedestrian path on the southern side of the Footscray Road Bridge (Bridge 90).



- In accordance with the plans, construction of the new shared path would involve the removal of some of the established native vegetation area along the Moonee Ponds Creek ... removal of approx. 30 trees on the east bank (and 12 on the west bank) as shown within the yellow boundary line below.



- WGTP contractors, CPB-John Holland, now wishes to extend the project boundary so as to construct a crane pad – a hard stand of compacted crushed rock + sheet pile wall and jetty platform on the east bank (upper diagram). This would involve the removal of another 50+ native trees on the east bank (lower diagram).



- The Friends of Moonee Ponds Creek strongly objects to the proposed extension of the project boundary and removal of the additional vegetation. The trees form part of an important area of established native vegetation with trees 30+ years old (and more of the older trees occur at the Footscray Rd end). The area is important because it serves as a biodiversity and habitat 'ark' along the lower Moonee Ponds Creek (e.g. Goshawks are known to nest in the site; Sacred Kingfishers use the site on their annual migration). There are no other such 'arks' along the lower Moonee Ponds Creek.



- The Friends of Moonee Ponds Creek questions the accuracy of the plans showing trees to be removed, as raised with CPB-John Holland following an on-site visit on April 1. Numbered trees on map not found on site; trees with no numbers in the site; large trees included in proposed extended boundary with no consideration of their environmental significance; a large unnumbered tree outside the proposed extended boundary unjustifiably included in 'Traffic Access Removals'. Our request

that the plans should be corrected has not been addressed. The application should not be assessed based on erroneous plans.

- In the permit application, the use of the term “temporary use of the land” is misleading as it will involve the **permanent** removal of 50+ trees from the land.

Such removal of vegetation does not meet Melbourne Planning Scheme provisions:

21.05-1 Protect and enhance the City’s habitats and biodiversity

Strategy 1.1 Encourage the retention of native vegetation ... and enhance indigenous and remnant vegetation areas in the City ... including waterways.

Strategy 1.5 Create and enhance biolinks for native flora and fauna.

21.05-2 To enhance the environmental value of Melbourne’s parklands, waterways and other open spaces

Strategy 1.1 Protect and enhance the vegetation, biodiversity, habitat, amenity and attractiveness of the city’s parklands, the Yarra and Maribyrnong Rivers and the Moonee Ponds Creek.

Strategy 1.2 Ensure open space links along waterways provide for recreational and environmental functions.

21.10-2 To maintain, enhance and increase Melbourne’s public open space network and promote greening of the City.

Strategy 2.2 Protect and enhance the biodiversity and habitat value of the City’s parks, gardens, open space and waterways.

- The Friends of Moonee Ponds Creek therefore calls for an alternative engineering solution to be applied to the construction of the shared path along Bridge 90, that will reassess the location of crane/piling pad and there will be no extension of the original project boundary and that there will be no additional tree removals.

Such a reassessment was proposed by CPB-John Holland in an email following an on-site visit on 1 April with CPB-John Holland representatives and FoMPC representatives:

“Actions from today’s meet are as follows:

1. Engineering review and justification required for the extension of project boundary to support crane/piling pads this includes review access/egress and location of crane/piling pad for Bridge 90 construction. [@Ungureanu, Dobu can we please actions this.](#)
2. Review of Tree 3320 and 3321 for retention as they fall outside of the surveyed crane pad area. [CPBJH Environment Team to review with Project Arborist.](#)

As discussed we will provide the below information and look to set an additional meeting.”

Shara Tomlins

Senior Environment Advisor - East

CPBJH Joint Venture

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To date, no response has been received, no outcomes provided of the “Actions” for the “reviews”, nor any additional meeting set up.

- The Friends of Moonee Ponds Creek calls for the reassessment of the wider Bridge 90 works program, which also involves bridge strengthening works. Consideration should be given to undertaking the bridge strengthening works first, which would allow a section of the strengthened bridge to be used when constructing the adjacent new shared path.
- We do not accept the argument put forward by CPB-John Holland that there should be no lane closures on Footscray Road or any disruption to traffic for the construction of the new shared path. Or any diversion of the existing shared path. It is noted that there are many road closures and disruptions to traffic associated with the construction of the WGTP, including Footscray Road.
- We do not believe that the proposed “temporary” extension to the project boundary that involves the removal trees of 30+ **years** in age from an important native vegetation area equates in any way with a ‘temporary’ 3-12 **months** disruption to traffic.
- The Friends of Moonee Ponds Creek asks that the permit not be granted.

Yours sincerely

A handwritten signature in blue ink that reads "John Kavanagh". The signature is written in a cursive, flowing style.

John Kavanagh
President