

Victorian Planning Authority
c/- East of Aberline
GPO Box 239Melbourne VIC 3001
EastofAberline@vpa.vic.gov.au

DATE: 20th October 2025

To whom it may concern:

Thank you for the opportunity to comment on the planning strategy of the East of Aberline project. I have had a long-term interest in Tozer Reserve for some 20 years now and have served as a volunteer on the Tozer Management Committee for the last 15 years. My interest is particularly in the native plants that have been emerging since the removal of the pines in the 1990's. I am a Citizen Scientist and upload my photos into the I Naturalist website. Many of my photos uploaded have been taken at Tozer Reserve. I designed and installed an educational sign at the reserve using my photos and this is utilised by the school students that regularly visit. (See below).

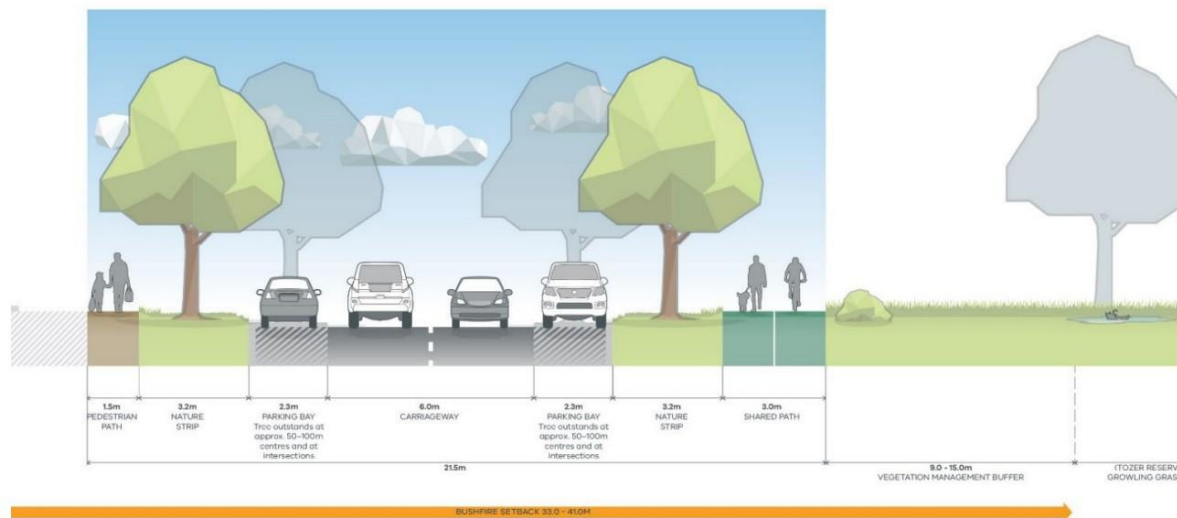


I recently published a Fourth Edition of my book “Plants of the Great South West” with many of the species featured being photographed at the reserve.

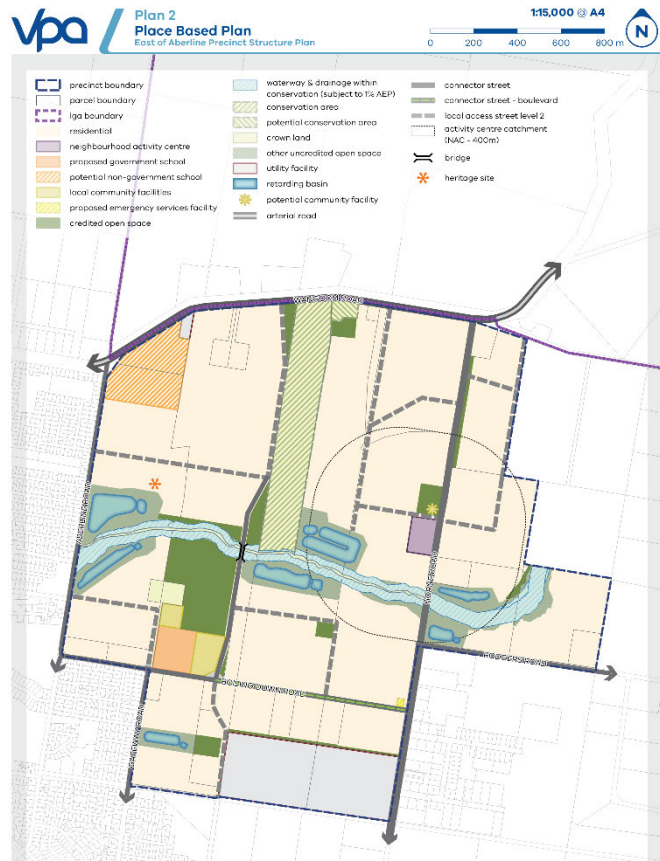
I have been involved with the discussions of the PSP over recent years and was reasonably satisfied last year with the proposals put forward. However, I am disappointed to find now that the design has been altered since then, especially with the buffer zones now proposed. Last year, there was going to be a 41 metre buffer zone on both sides of the reserve. (See attached snips from last years proposal) Now this has been reduced to a minimum of 33 metres with most of this being taken up with road, nature strips and parking bays. Only 9 – 15 metres are through a vegetation buffer.

oss Section 5

cal Access Street Level 2 (21.5m) Tozer Reserve Perimeter Road Western Side

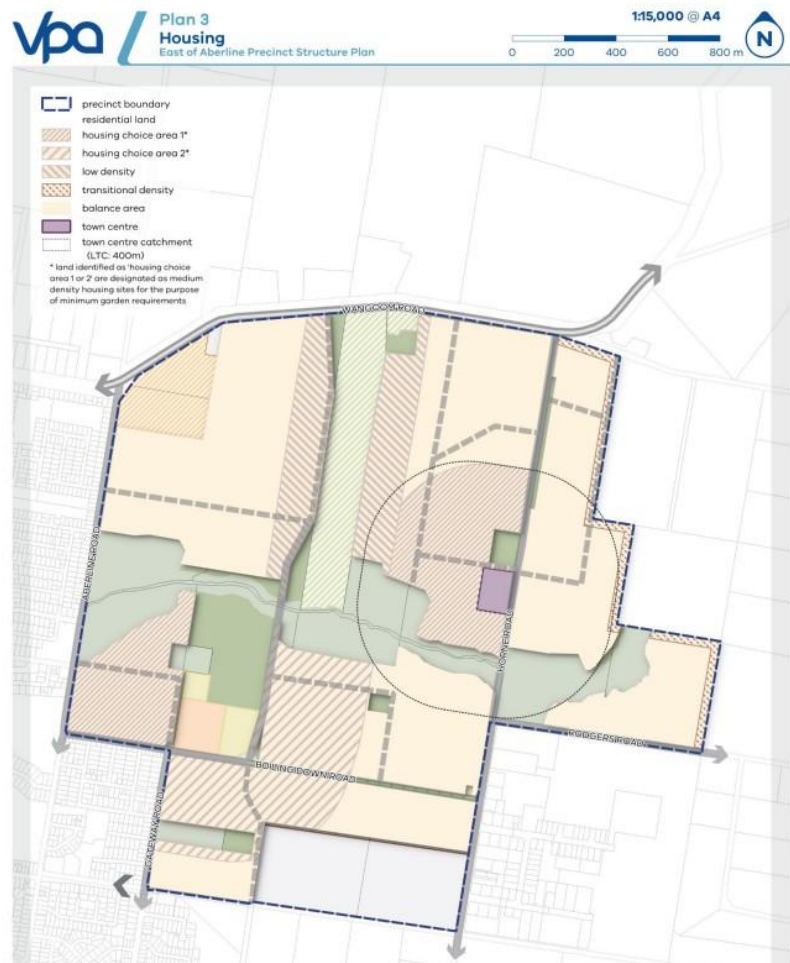


The map provided is very confusing! It looks like the road on the western side runs close to the Tozer boundary with no buffer at all on the east side! Appropriate buffer zones are incredibly important for a reserve like Tozer, any lawn grasses (like Kikuyu grass that produce runners) are especially a problem as they smother out native species. Once established they are very difficult to remove. Why not have a “Wildflower Meadow” using grassland species like that which occur at Tozer, similar to what they are doing up at Woorndoo?



Houses close to the reserve are also a big problem as residents are likely to dispose of garden waste by throwing it over the fence. Hence garden escapees are likely to get established in the reserve and will be a constant problem in removing them. See image at right. Also, there are no cat/dog controls planned at this stage for residents nearby.

Also of concern is that there has been no attempt to improve the traffic situation for people exiting the reserve, the position is very dangerous now, what's it going to be like in the future with many more people residing in the area.



Last year I made comments regarding the ecological report used in the PSP, below I include my comments again as they are still relevant.

[REDACTED]

[REDACTED]

Its really disappointing that consultants would choose to survey this area in May and in one of the driest years on record. Most plants don't flower until spring or even summer not autumn! Orchids in particular, are not above ground until they are ready to flower. That's when they are most identifiable. The report says: "*A total of 103 flora species were observed within the study area, including 54 indigenous and 49 nonindigenous species*". We have recorded 92 local indigenous species over the last ten years! It's a mistake to assume that many don't exist anymore, the plants regrew after 80 years of it being a pine plantation so are very likely to grow back again after a good year or two.

The report says: “No other national or State significant flora were recorded during the site assessment or are expected to occur within the study area due to historical and existing land use and agricultural disturbance”.

While not of State significance, we have recorded 4 species of sun orchid *Thelymitra* sp. in the last few years, not recorded in the southwest before.

Photo right is *Thelymitra brevifolia* only recorded at Tozer. Who knows what else we might find. Its really disappointing to see outside consultants being brought in who don't know the plants and don't consult with locals who do! Why have our sightings that have been uploaded to the Victorian Biodiversity Atlas, been discounted/ignored?



“While PGW2 and PGW3 overall comprised a relatively diverse understorey of native flora, many understorey species were observed in low abundance as Wattles including Black Wattle *Acacia mearnsii* (which is ‘Protected under restricted use’ under the FFG Act) and Silver Wattle *Acacia dealbata* dominated much of the middle layer”.

Acacia dealbata is not a local species as suggested in fact we have not recorded it at all at Tozer. Many of the species listed that are labelled as “local species that have been planted”, are not local species at all! Some local species are listed as planted when they are very difficult to propagate, so I seriously doubt this.

“Two State-significant flora (Swamp Flax-lily *Dianella callicarpa* and Golden Cowslips *Diuris behrii*) have a moderate likelihood of occurrence within the study area”.

Apparently, they only found two *Dianella callicarpa*! (Photo right) They didn't look too hard as there are dozens if not hundreds of them! There is also another *Dianella*, *Dianella longifolia* var. *longifolia* that we have recorded, var *grandis* has been recorded in the past as they comment, this is a mistake, it obviously was var. *longifolia* that has been mis-recorded.



Senecio glomeratus subsp. *longifructus* **Threat status FFG: Vulnerable (VU)** is also a State significant plant that we have recorded so there is actually three not two species with FFG classification.

Overall, I think the consultants have made a poor effort at recording the species at Tozer Reserve. Thanks for the opportunity to comment.



Some of the Tozer Reserve wildflowers are L to R Top: *Arthropodium milleflorum* (Vanilla Lily and *Arthropodium strictum* (Chocolate Lily).

L to R Below: *Bulbine bulbosa* (Bulbine Lily), Orchids: *Pterostylis concinna* (Trim Greenhood), and *Corybas incurva* (Slaty Helmet-orchid)

