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RE: East of Aberline PSP community consultation

Thank you for opportunity to comment on the PSP for East of Aberline Road Warrnambool.

As an ecologist with a strong interest in Grasslands of the Victorian Volcanic Plain I was delighted to be introduced to Tozer Reserve and the nearby Maam Reserve about 15 years ago. Until this time my assumption was that there was no remaining patches of Plains Grassy Woodland or Plains Grassland close to Warrnambool. I was further delighted by the beautiful story of Tozer Reserve, this story includes funding scholarships to local schools and eventual final harvest of the pines and then the twist in the tale...this crucial decision by those then responsible for the management of the reserve, to leave the front section largely alone. No trees have been planted in the front section except a few near the front gate, the *Acacia mernsii* throughout this section are all the result of natural recruitment.

This crucial management decision allowed Tozer Reserve to reveal itself through a succession of ecological states as it has undergone an ecological recovery. The recovery of the reserve and its continuing revelation of 'new' flora and fauna species has been carefully documented by volunteers and many records are publicly available on the Victorian Biodiversity Atlas and iNaturalist.

The recovery of Tozer reserve to its current Plains Grassy Woodland EVC has taken time and care but it has largely been the result of allowing time for ecological processes to play out. This process is ongoing with much of the 'back section' now showing signs of a similar transformation.

With the many pressures that will come from housing development surrounding Tozer it is imperative that careful planning and appropriate rules and buffers in place to ensure the continued ecological progression of this very special patch of native vegetation and learn from it.

Additionally pressures from climate change will require clever and careful planning such as enough shade, careful water management and cool green and blue spaces for people to enjoy.

There are some broad elements of the PSP that I support including the protection of Russells Creek and Tozer Reserve and the location of constructed wetlands close to these features. I also strongly support the siting of paths and roads to avoid going through Tozer Reserve, bisecting the reserve would be devastating for biodiversity. I also support the focus on Growling Grass Frog habitat protection. I like that the sports oval and school are also close to the walking track along Russells creek. Below I outline some concerns I have.

Threatened Flora

I was shocked to note that there was no spring flora surveys conducted in Tozer Reserve as part of the planning process. This seems to have translated into Tozer Reserve not being given the elevated biodiversity conservation value it warrants. It seems a consequence of this is that the proposed buffers around the reserve have been reduced from earlier iterations of the plan and now include the potential for roads and housing along the reserve. It is extremely difficult to tell from the documents where exactly the roads and houses and buffers will go.

Several listed species including *Dianalla callicarpa* are present in Tozer Reserve but just as importantly the Tozer population of many species are considered regionally significant due to their persistence and the likely significance of the genetic material they contain. The orchid species at Tozer include multiple genera, the Orchid Conservation staff at the Royal Botanic Gardens Orchid Conservation Lab have advised that these orchids have persisted as tubers since before the pines were planted.

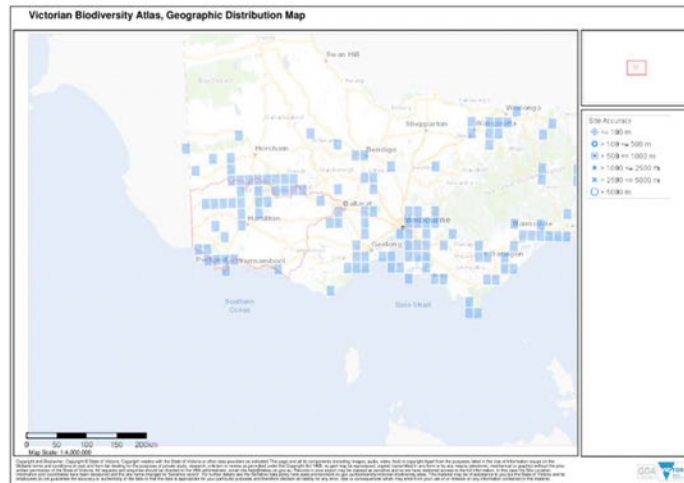
For many flora species Tozer Reserve is a critical link in their distribution. One example is *Corybas incurvis*, as the below distribution map shows, the population at Tozer is a crucial link that fills a 'distribution void' for this species caused by land use change and all the other threats we know to impact native flora in this highly cleared areas of Victoria.

A similar distribution pattern occurs for many other species at Tozer Reserve. This highlights the regional significance of the reserve as a sink of valuable genetic material and a potential link from which to restore these species. Birds, invertebrates and reptiles and mammals also have a strong presence at Tozer reserve.

My personal evaluation is that Tozer Reserve is the most Biodiverse place in Warrnambool outside the marine environment. This assertion is not backed up by data analysis but is based on many years of ecological observation.

Victorian Biodiversity Atlas, Geographic Distribution Map

Taxon Id	Scientific Name	Common Name	Discipline	Level
500837	Corybas incurvus	Slaty Helmet-orchid	Flora	Species



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Recommendations

- Please produce a clear map showing at least 60m buffers around Tozer Reserve.
- By buffer I mean a 60m wide strip of plains grassland inspired vegetarian with no exotic species, maintained by burning or mowing (with a weed free mower) once a year and allowed to flower and set seed in spring. Such wildflower dense buffers are beautiful and would also enhance livability of the area.
- Ensure roads and paths are placed outside this buffer zone.
- Aim high: the building of the beautiful Warrnambool Library shows that Warrnambool can aim high and does deserve the very best. Aim high- aim for 15% public open space, aim for beautiful connected walkways without unsafe road crossings, aim for shade and water to cool the area, aim to really, genuinely protect Tozer Reserve with proper buffers. Examples where grassland specie shave been used in landscaping include [Armstrong Creek – Australian Ecosystem](#) – this won a design award in 2017 *“The Landscaping Victoria judges panel described the Connearwarre project as “a major environmental project that is immaculately detailed, making it a community success – a beautiful place for walking, playing and enjoying the outdoors for humans, and through natural rock placement and the use of tree stags as habitat areas, a sanctuary for wildlife too.”*

- Public open space – the amount and configuration in the plan is not sufficient. If we want people to be outdoors and active and to connect to their neighborhood we need to design for it. Crucially we need to design public open space to keep people out of Tozer reserve. It is not a recreation space but a flora and fauna reserve. We need to ensure people have plenty of other beautiful places to walk, sit, play, connect, contemplate and enjoy so that we don't put any more pressure on Tozer Reserve.
- Make it clear that Tozer Reserve is not a public recreation reserve it is a flora and fauna reserve.
- Include rules for the keeping of cats as inside property boundaries only, or preferably a cat free area as is done in Halls Gap and other significant natural areas.
- Ensure the hydrology changes associated with development are managed to ensure water for Tozer reserve ephemeral wetlands and that all retention basins are wildlife friendly design and planted with native vegetation suitable for Plains Grassy Wetland and Plains Grassy Woodland EVC.
- Slow the flow of water through the landscape with vegetation and swales, which could be built into the buffer around Tozer Reserve .
- Safety and livability: note red circle on map below – this major road crossing between a park and sports field will be a nightmare for parents with multiple children, how do you safely take younger but independent kids to the park while watching older kids play sport? How do kids gain confidence riding their bikes around the neighborhood when they have to cross a major road at such a child focused point. Please move this major road to the other side of the proposed sports ground so that families can enjoy both the park and the sports ground safely.



