NWAlliance

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NWA submission regarding the

Documentation for the Geelong Strategic Assessment (NWGGA), November 2025

8 December 2025

Don't forget about me: Cowies Creek (2023) (detail) by Nikki McKenzie, Norn Stanley, Tarryn Love

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1. Introduction

We welcome the opportunity to further comment on the documentation for the Geelong Strategic Assessment (NWGGA). The current documentation package represents a clear improvement on previous work.

We understand that this stage of the strategic assessment process is likely to be the last opportunity for official public feedback prior to the documentation package being presented to Council for approval.

Councilors will wish to see a package that recognises the importance of matters such as early acquisition and interim land management.

A timely conclusion to this process is important because of the ongoing decline in conservation value across the NWGGA.

We therefore urge City of Greater Geelong to take further steps to quickly resolve matters to improve the biodiversity outcomes across the NWGGA.

2. Key matters

Several key matters need significant improvement. These are mostly not new matters, but have been disappointingly ignored in the development of these newly exhibited documents:

- Acquisition
- Interim management
- The extent of Cowies Creek Conservation Area
- Boundaries of Conservation Areas in general
- Lack of survey
- Protection of Conservation Area boundaries
- Weak wording regarding the Gully Avoidance Area

2.1.1. Acquisition timeline

According to the current documentation, land to be protected will not be purchased until the PSP process is completed and adjacent subdivision occurs. That means the Northern Conservation Zone, in particular, will be potentially unmanaged for many years. This is unacceptable. There are two acceptable options:

- Purchase the land upfront
- Enter into a comprehensive interim management agreement with the owners.

One of the significant lessons from the Melbourne Strategic Assessment is that, to conserve and protect biodiversity, land cannot remain in private hands once land holders have no incentive to manage it.

Failing to buy upfront or to otherwise ensure good management of conservation land across NGWWA is a dereliction of responsibility by both City of Greater Geelong and the Australian Government through DCCEEW.

We understand that upfront purchase is expensive, but cost savings on weed management are significant, and the risk to conservation values is too high for this action to not be undertaken.

Upfront purchase also removes the risk of the properties being sold to third parties, and the potential for loss on sale litigation.

This applies to the Northern Conservation Area, the Eastern Conservation Area, the Cowies Creek Conservation Area, and the Gully Avoidance Area.

2.1.2. Interim management

There is no provision in the GSA documentation for any form of interim management. This is a significant omission and must be addressed. Without interim management, conservation values will rapidly decline. There is certainly no guarantee of their security. This is another key learning from the Melbourne Strategic Assessment.

Interim management has the additional benefit that, because it is occurring on private land, it is not as constrained in what actions can occur. Consequently, it can lead to good conservation outcomes that might not otherwise be achievable.

The levy needs to fund interim management. Interim management will require a funded position of its own, the cost of which must be included in the Levy calculations.

2.1.3. Cowies Creek

Because of likely increased flows along Cowies Creek, the current plan proposes adding Growling Grass Frog ponds downstream of the Ring Road, outside the WGGA.

The plan also proposes works at the Old Bluestone Bridge to improve that bottleneck to metapopulation movement.

The documents also include new confirmed records at the western end of Cowies Creek, beyond Evans Road, and better protection for that far end before it goes under the rail line there.

These amendments are likely to strengthen the Growling Grass Frog meta-population, and they are welcomed. We agree with the commitments made for the area outside WGGA.

However, several matters relating to Cowies Creek are outstanding.

- More land should be conserved for Growling Grass Frog on west side of Cowies Creek
    - Overall, we argue that the land set aside for Growling Grass Frog along Cowies Creek is insufficient, and that the boundary reflects developer pressure rather than conservation considerations.
    - We do not accept the argument that the presence of “significant areas of cropping” (Biodiversity Conservation Strategy, p. 45) represents an appropriate boundary to the Conservation Area. Cropped land can be easily restored to good quality habitat for Growling Grass Frog.
    - The habitat for Growling Grass Frog has been provided (mostly) only on the south side of the Creek. The lack of Conservation Area on the north side of the Creek needs to be compensated for.

- In addition, a bike path is proposed on the north side of the Creek, further diminishing the little space set aside for habitat there.
- Increases in flows in Cowies Creek will also diminish existing Growling Grass Frog habitat.
- Arguments about “break of slope” are also weak. Growling Grass Frog are known to move broadly through the landscape, with topography being incidental to their foraging.
- We note the Growling Grass Frog Significant Impact Guidelines recommend a 200m distance, not the 100m-on-one-side proposal currently in the Biodiversity Conservation Strategy.

- The ephemeral creek running south of Cowies Creek labelled as a “landscape connection” should be incorporated into the Conservation Area. It is most likely well-used by the Growling Grass Frog metapopulation for foraging. When wet, it may provide breeding areas.
  - The Biodiversity Conservation Strategy notes this area as being “potential” to “provide additional habitat for the species.
  - We argue that rather than this “potential” turning into nothing because of lack of protections, that the ephemeral stream area be included in the Cowies Creek Conservation Area.
  - The ephemeral stream is a logical inclusion. As noted by the Biodiversity Conservation Strategy, the current protections within the WGGA are inadequate, hence the stated aim of providing additional protection downstream outside the WGGA.
  - It is unclear the extent to which increased flows will impact the ephemeral stream. It is also unclear if any Growling Grass Frog surveys have been conducted in this area. Further information should be provided.
  - We argue the addition of the ephemeral stream areas in the Cowies Creek Conservation Area would provide much needed certainty for the persistence of Growling Grass Frog in the WGGA.
- Given the likely increased flows in Cowies Creek due to development, we would like to know what further actions could take place within the NGGA to reduce the increased predicted flows. We would like these actions investigated and solutions incorporated into the plan.
- We would also like to see City of Greater Geelong take additional actions to protect the reaches of Cowies Creek north of the rail line, outside NGGA.

2.1.4. Extent of Moorabool River Conservation Area

It should be clearly stated that the Conservation Area’s 100 m buffer along the Moorabool River is the bare minimum. Every effort should be made to expand this area to include existing and potential habitat sites.

2.1.5. Boundaries of conservation areas

There is provision for “minor” boundary changes to occur, particularly when impacts to MNES will be minimal. We would like to see stronger wording about this. It is very easy

for a developer to successfully argue that a weedy patch is not important compared to housing, even if it can potentially be restored or provides good buffering to a population of conservation significance.

We absolutely don't trust that good process will prevail here.

Changes to boundaries in the MSA Conservation Areas that have occurred with DEECA and DCCEEW approval have meant almost 10% of area of MSA Conservation Areas has been lost.

We note that Conservation Areas never get expanded if areas of good biodiversity are found immediately adjacent. They only ever get cut.

Wording should state that there can be no net loss of area.

2.1.6. Lack of survey

Several land holders have refused access to their land for purposes of ecological survey. These developers should not be rewarded for their intransigence by having their land assumed to be free of MNES.

Rather, development should not be allowed until survey happens.

If MNES are found, then development should proceed as though it is a process-based development, but with the developer still having to pay the Levy. That is, the developer should gain nothing by withholding survey.

2.1.7. Weak wording regarding the Gully Avoidance Area

The commitments and measures applying to the Gully Avoidance Area are so weak as to be almost meaningless. No funding is provided for management of this area despite it having Natural Temperate Grassland of the Victorian Volcanic Plain and Striped Legless Lizard. The only tangible benefits are that native vegetation will be identified and some signs put up.

There may be some unstated logic behind this lack of environmental care, perhaps relating to the land not being eligible as an offset.

Regardless, it is simply wrong to abandon this land to a future without funding or management.

3. Additional matters

3.1.1. Overall impacts to nature are considerable

We wish to again note for the record that we are still very uncomfortable with the extent of offsetting. We reluctantly accept that the time has passed for those arguments in this case. "Residual impacts" in the NGGA amount to:

- 5.4 ha Natural Temperate Grassland of the Victorian Volcanic Plain habitat
- 130.8 ha Striped Legless Lizard habitat
- And an incredible 624 ha of Golden Sun Moth habitat.

We should not delude ourselves that this is a good outcome for nature. It is not.

3.1.2. Prosecution of land holder who destroyed Striped Legless Lizard habitat

City of Greater Geelong should proceed with compliance. It is shameful that this land holder cleared known Striped Legless Lizard habitat and then gets the benefit of developing it. The matter should be very well documented; it is hard to imagine a good reason City of Greater Geelong is avoiding its responsibility here.

We note there is risk to City of Greater Geelong in not proceeding with prosecution. Apart from this being a green light for developers who already feel they can destroy the environment with impunity, Council would also be vulnerable to being taken to VCAT for not undertaking its responsibilities.

3.1.3. "Landscape connections"

Many of these "connections" are along what will be very busy roads and are therefore misleading.

No documentation has been provided about the quality or provisions for ensuring biodiversity connectivity along and throughout any of these areas.

No KPIs exist to ensure quality and function.

3.1.4. Moorabool Avoidance Area

We have concerns about the need to make environmental protection of the Moorabool Avoidance Area as legally solid as possible, since developers will continue to push back on this matter, and urge Council to ensure there is good legal and policy scaffolding to prevent as much encroachment of development as possible, and to ensure good ecological management of the area.

3.1.5. Community engagement

We are disappointed that the plans contain no focus on community engagement for the purposes of building long-term stakeholder buy in and community oversight. There should be an allocation in the Levy for this. New homeowners should receive materials on their local grasslands etc. Including some wording around this would go some way to ensuring this is a good forward-looking package.

3.1.6. Funding

We welcome the inclusion of funding for the 10-30 year timeframe.

Funding for interim management is a glaring omission, which should be rectified.

It is overly optimistic to think that compliance issues will require only one Council officer position across the whole of NWGGA. One VCAT case can consume a huge amount of an officer's time. The compliance budget should be doubled.

4. We are

The North West Alliance is a coalition of organisations and local community members with serious concerns that the environmental values of the Northern and Western Geelong Growth Areas and the Geelong Strategic Assessment are not being given their due importance.

Batesford Fyansford and Stonehaven Landcare Group

Cool Geelong

Friends of Cowies Creek

Friends of the Bannockburn Bush

Geelong Field Naturalists Club

Grassy Plains Network

Koala Clancy Foundation

Parents for Climate Action Geelong - Bellarine – Surfcoast

People for a Living Moorabool

Victorian National Parks Association

VVP Biosphere