

**Industrial Facility,
276 Rex Road,
Campbellfield, Victoria
(EPBC 2021/8934)**

**EPBC Act Preliminary
Documentation**

**Prepared for
Bamford Management Pty Ltd**

July 2026

Report No. 20045.04 (2.4)



**Nature
Advisory**

(Formerly Brett Lane & Associates Pty Ltd)

5/61-63 Camberwell Road
Hawthorn East, VIC 3123
PO Box 337, Camberwell VIC 3124

(03) 9815 2111
www.natureadvisory.com.au

Contents

1. Description of the Action	1
1.1. Project Objectives.....	2
1.2. Location of the Project.....	3
1.2.1. Land use history at proposed area.....	3
1.3. The Proposed Action	3
1.3.1. Construction Methods and Techniques	3
1.3.2. Proposed Timing of the Action	3
1.4. Design Parameters.....	4
1.5. Alternatives to the Proposed Action	4
1.6. Background to the development of the Project	4
1.7. Consequences of not proceeding with the project	4
2. Description of the Environment and MNES.....	5
2.1. Native Vegetation surveys	5
2.2. Ecological communities	7
2.3. Flora species	7
2.4. Flora surveys	8
2.4.1. Matted Flax-lily.....	9
2.4.2. Other listed flora species	9
2.5. Fauna species	12
2.6. Fauna surveys	12
2.6.1. Golden Sun Moth.....	12
2.6.2. Striped Legless Lizard	13
2.7. Adequacy of assessment.....	17
3. Relevant Impacts.....	24
3.1. Direct impacts to MNES.....	24
3.1.1. Matted Flax-lily.....	24
3.1.2. Habitat for Golden Sun Moth	24
3.2. Indirect impacts on MNES	24
3.3. Duration of impact	25
3.4. Risks to MNES during construction	25
3.5. Predicting potential unknown impacts	25
4. Proposed Avoidance and Mitigation Measures.....	26
4.1. Avoidance of impacts.....	26

4.2.	Mitigation of Impacts	26
4.2.1.	Matted Flax-lily.....	26
5.	Residual Impacts and Proposed Offsets	28
5.1.	Golden Sun Moth	28
5.2.	Matted Flax-Lily	28
5.2.1.	Offset site.....	29
6.	Other Approvals and Conditions.....	30
6.1.	Zoning	30
6.1.	State planning provisions	30
7.	Social and Economic Benefits.....	31
8.	Environmental Record of Persons Proposing to Take the Action	32
9.	Ecologically Sustainable Development	33
10.	Conclusion.....	34
11.	Information Sources Provided in the Preliminary Documentation	35
12.	References	36

Figures

Figure 1: Project locality map	1
Figure 2: Outline of proposed land uses at 276 Rex Road, Campbellfield (prepared by EMKC)	2
Figure 3: Native vegetation and MFL recorded within the study area	6
Figure 4: GSM records and tile grid survey location.....	14
Figure 5: VBA records within 5km.....	17

Tables

Table 1: Optimal survey period for listed flora species.....	8
Table 2. Flora likelihood of occurrence table	10
Table 3. Fauna likelihood of occurrence.....	18

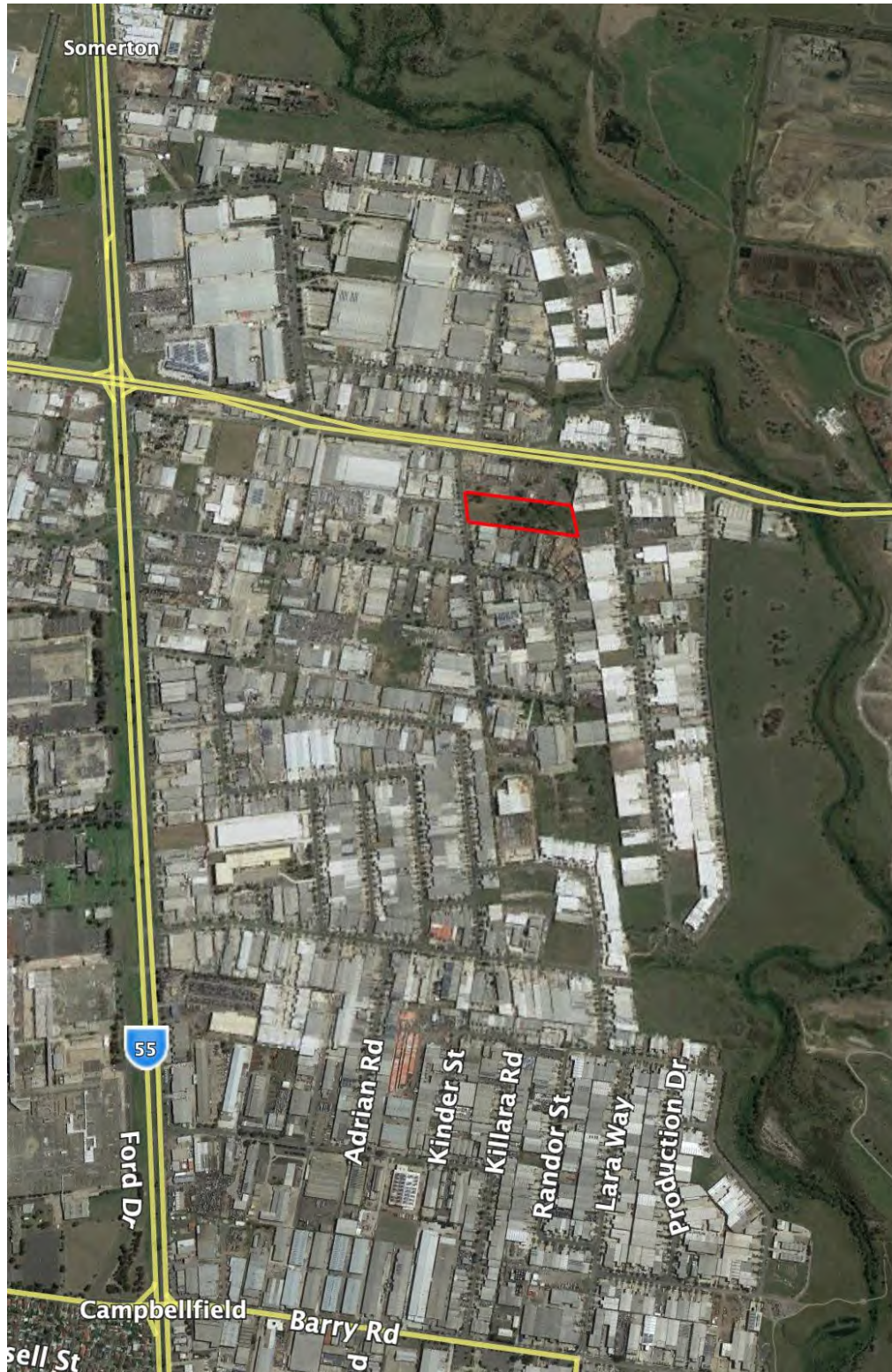
Appendices

Appendix 1: Matted Flax-lily Salvage and Translocation Plan	39
Appendix 2: Offset Management Plan for Matted Flax Lily <i>Dianella amoena</i>	40

1. Description of the Action

This section provides information on the proposed action. The proposed action is the construction of an industrial facility at 276 Rex Road, Campbellfield, Victoria (see Figure 1).

Figure 1: Project locality map



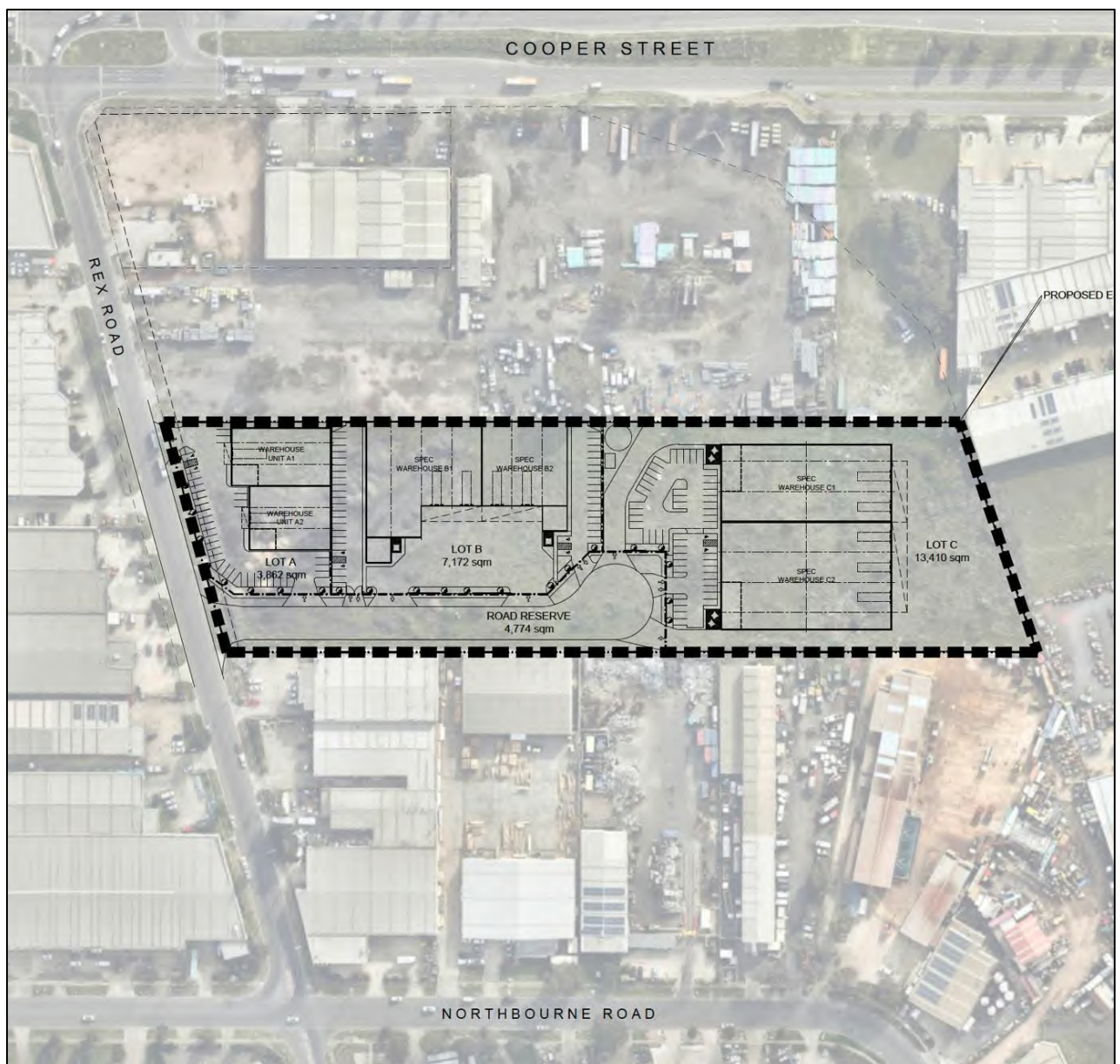
1.1. Project Objectives

The study area is located within the Hume local government area and is currently zoned Industrial 1 Zone (IN1Z) in the Hume Planning Scheme. The intention is to construct an industrial facility, which is envisaged to include:

- A three-lot subdivision;
- Development of six industrial warehouses; and
- Reduction of car parking.

An outline concept plan summarising the land use mix is shown in Figure 2.

Figure 2: Outline of proposed land uses at 276 Rex Road, Campbellfield (prepared by EMKC)



1.2. Location of the Project

The site is located at 276 Rex Road, Campbellfield – a northern suburb of Melbourne. The site is approximately 19 kilometres north of Melbourne's CBD. It has a frontage of approximately 94 metres to Rex Road on the west of the site and is otherwise surrounded by industrial complexes to the north, east and south. The site and its surrounding land use make up a part of the largely industrial zonation of the Campbellfield suburb. The site has an area of 2.92 ha and is located within the North Growth Corridor, one of five designated urban growth corridor areas of metropolitan Melbourne. The site sits within an area designated as 'existing urban' in this plan (GAA 2012).

1.2.1. Land use history at proposed area

The site area has had limited land use when compared to the surrounding industrial facilities. The site has had no previous developments but was instead used for cultivation and pasture improvement to support its former historic use as a stock grazing property.

Furthermore, it is understood that the previous landowner was responsible for illegal clearing of native vegetation onsite sometime between 2018 and 2020. This has resulted in a notable decline in the quality of remaining biodiversity values.

1.3. The Proposed Action

It is proposed to develop the site for industrial purposes, consistent with its zoning and designation for future 'employment' and 'urban' uses under approved regional and local strategic plans (Growth Corridor Plan, Growth Areas Authority). The development would comprise a variety of lot sizes varying between approximately 0.386 and 1.34 hectares, as well as six warehouse units, an internal road network and car parks. Lots will be serviced with electricity, communications, sewer, water and gas reticulation in accordance with regulatory requirements.

The disturbance footprint for the proposed action is the entire 2.92 ha site area. No adjoining areas are anticipated to be indirectly impacted by the proposed action.

No environmental values identified will be retained on the site.

1.3.1. Construction Methods and Techniques

It is proposed to subdivide and develop the land, and activities will include:

- Removal of all native vegetation, equating to a loss of 2.48 ha in patches, including five large trees;
- Removal of all introduced/ exotic vegetation;
- Removal of topsoil deposits for the construction of internal roads and infrastructure;
- Site levelling works;
- Sewer, water main and storm water drainage construction and associated trenching;
- Pavement works for roads and pathways; and
- Construction of buildings on the lots together with car parking, fencing and landscaping.

1.3.2. Proposed Timing of the Action

The anticipated timing of the 18 month construction period is as follows:

- Anticipated start date: July 2026

- Anticipated date of completion: December 2027

Furthermore, the operational timing of the development is expected to commence on completion of construction and will continue to operate in perpetuity.

1.4. Design Parameters

The facilities are designed to incorporate modern Environmentally Sustainable Design (ESD) requirements that will guide the development of facilities in line with modern sustainability and environmental practices that are also designed for maximum operational efficiency. The facilities have been designed with consideration for the surrounding local context, providing a high-quality urban design response that is coherent with the design of the surrounding industrial buildings, incorporating modern sustainable and environmentally friendly materials to increase the operational energy efficiency of the buildings. These measures have been taken to ensure the proposed development promotes the area as one of significant industrial value.

1.5. Alternatives to the Proposed Action

The site and surrounding area are zoned Industrial 1 Zone (IN1Z) under the Hume Planning Scheme. The purpose of this zoning is to *‘provide for manufacturing industry, the storage and distribution of goods and associated uses in a manner which does not affect the safety and amenity of local communities.’* Accordingly, the site is designated for future ‘employment’ and ‘urban’ uses pursuant to relevant strategic plans approved by local and State authorities. No alternative sites were considered for a future industrial development. Future development of the site will reflect a site responsive design, which meets relevant environmental legislative requirements.

Furthermore, a Planning Permit (P23308.01) has been issued by Hume City Council for the industrial development, as described above.

The only alternative to the proposed action available would be to leave the site in its current form or attempt to manage it as a reserve, while the surrounding area is developed in accordance with the designated industrial zoning. However, management of biodiversity values has not been flagged as an obligation by the relevant regulatory bodies and therefore it is not considered further in this investigation.

1.6. Background to the development of the Project

Bamford Management Pty Ltd engaged Nature Advisory in 2025 to prepare preliminary documentation to support a proposed industrial development of the site.

Nature Advisory had previously conducted a Flora and Fauna Assessment of the site in 2020 and subsequent targeted surveys. The implications of the current proposal have therefore been informed by the results of these previous site assessments.

1.7. Consequences of not proceeding with the project

In accordance with the North Growth Corridor Plan (GAA 2012) and zoning of the site, the land is within an existing urban area and is identified for industrial development, which is consistent with the adjacent land parcels on all four sides of the property. Not proceeding with the project would reduce the amount of industrial land that has been assigned to the North Growth Corridor for industrial/commercial development purposes and reduce employment opportunities for new residential areas in the same Growth Corridor. Development of the property for employment related purposes is consistent with the broad strategic planning directions for the Growth Corridor, supported by the Victorian Government.

2. Description of the Environment and MNES

The proposed development at 276 Rex Road, Campbellfield was the subject of an EPBC Referral in 2021, with the Referral Decision designating the project as a ‘Controlled Action’ (EPBC 2021/8934). The relevant controlling provision is as follows.

- Listed threatened species and communities (sections 18 & 18A).

This Referral was informed by a range of ecological assessments of the site, as documented in Appendix 1. These included:

- A native vegetation survey;
- Flora assessment and targeted surveys for threatened flora species; and
- Targeted surveys for threatened fauna species.

The findings of these surveys are summarised in the following sections.

2.1. Native Vegetation surveys

A substantial proportion of the proposed development site has been altered significantly through cultivation and pasture improvement to support its former historic use as a stock grazing property. The property was subject soil disturbance (by previous owners) before the planning permit for the currently proposed industrial development was issued.

Within the subject property, one Ecological Vegetation Class remains in limited areas:

- Plains Grassy Woodland (EVC 55_61).

Vegetation surveys were undertaken using Victoria’s habitat hectare assessment protocols (DSE 2004). Patches of native vegetation were identified and recorded using the Victorian definition (minimum 25% of the total perennial understorey plant cover is native, DELWP 2017). Native vegetation and removal values from the most recent survey are referred to in this report and were used to calculate offsets to meet planning permit requirements.

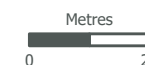
The location and extent of the native vegetation is shown in Figure 3.



Figure 3: Ecological Features

Project: 276 Rex Road,
Campbellfield
Date: 27/01/2021

- ▭ Study area
- ▨ Plains Grassy Woodland (EVC 55)
- ▲ Matted Flax-lily



PO Box 337, Camberwell, VIC 3124, Australia
www.natureadvisory.com.au
 03 9815 2111 - info@natureadvisory.com.au

2.2. Ecological communities

The EPBC Protected Matters Search Tool (DAWE 2020a) indicated that five ecological communities listed under the EPBC Act had the potential to occur in the search region. One of these communities was found to potentially occur within the study area: *Grassy Eucalypt Woodland of the Victorian Volcanic Plain* (GEWVVP), listed as critically endangered under the EPBC Act.

A targeted survey for GEWVVP was undertaken within the project area in accordance with the listing advice for GEWVVP (TSSC 2009), by DEECA accredited vegetation assessor Brett Macdonald, Senior Ecologist at Nature Advisory, on the 5 November 2020.

During the survey, all vegetation within the project area was visually assessed against the GEWVVP key diagnostic criteria and condition thresholds, provided on pages 6-8 of the listing advice (TSSC 2009). This involved approximately 6 hours of visual assessment of the composition, floristics and percentage cover of the vegetation, initially along transects of three metre spacing, and then in finer detail where the vegetation was, or was close to, meeting the GEWVVP qualifying criteria. Areas of vegetation found to meet the GEWVVP qualifying criteria were mapped using the GPS based ArcGIS Collector app.

The vast majority of the project area was dominated by perennial introduced species, i.e. more than 50% of the perennial vegetation cover comprised introduced species, predominantly Chilean Needle-grass *Nassella neesiana*. A 0.282-hectare area of vegetation in the east of the project area was dominated by indigenous ground layer perennial species, predominantly Kangaroo Grass *Themeda triandra* but also other indigenous grass and forb species. River Red-gum *Eucalyptus camaldulensis* was present as a clump of regenerating saplings, mostly less than 5 metre tall, in the east of the project area. These saplings represented less than 5% of the vegetation cover throughout the project area. Evidence of the former presence of larger River Red-gum trees was observed as closely cut tree stumps and scattered debris, including intact fruits. Mature specimens of River Red-gum were also observed in the adjoining property north of the project area.

In accordance with page 4 of the listing advice, the 0.282-hectare area of vegetation which was dominated by indigenous perennial species (i.e. a derived grassland) would not qualify as the Natural Temperate Grassland of the Victorian Volcanic Plain community, given that it is well evident and well established that the site would once have been dominated by River Red-gum. The 0.282-hectare area of vegetation instead must be assessed as the derived grassland variant of the GEWVVP community. Although it is possible that the canopy components may re-establish over time, this assessment must consider the current state of native vegetation. Furthermore, assessing this vegetation as a derived grassland variant of GEWVVP does not have any bearing on the level of legislative protection or biodiversity value assigned, as derived grassland is still considered to qualify as GEWVVP. Nonetheless, given that the minimum size threshold for a patch of GEWVVP is 0.5 hectares (in accordance with page 7 of the listing advice [TSSC 2009]), the 0.282-hectare patch is too small to be considered the listed community.

Therefore, GEWVVP does not occur in the study area. Indeed, no ecological communities listed under the EPBC Act occurs within the study area.

2.3. Flora species

The VBA search (DELWP 2020) and EPBC Act Protected Matters Search Tool (PMST) (DAWE 2020a) indicated that the property potentially supported 15 threatened flora species listed under the EPBC Act. The likelihood of occurrence for these species is outlined in Table 2. This assessment determined that suitable habitat exists for eight EPBC Act listed species (Table 2). These are:

- Button Wrinklewort
- Basalt Peppercress
- Clover Glycine
- Large-headed Fireweed
- Matted Flax-lily
- Spiny Rice-flower
- Trailing Hopbush
- White Sunray

Targeted surveys for those listed flora species for which suitable habitat was found in the study area were undertaken in the autumn, spring and summer of 2020 (8th July 2020, 5th November 2020 and 16th December 2020), to coincide with the flowering period for all target species (Table 1).

Table 1: Optimal survey period for listed flora species

Common Name	Scientific Name	Optimal survey (flowering) time											
		J	F	M	A	M	J	J	A	S	O	N	D
Button Wrinklewort	<i>Rutidosia leptorrhynchoidea</i>											X	X
Basalt Peppercress	<i>Lepidium hyssopifolium</i> s.s.												X
Clover Glycine	<i>Glycine latrobeana</i>											X	
Large-headed Fireweed	<i>Senecio macrocarpus</i>											X	
Matted Flax-lily	<i>Dianella amoena</i>												X
Spiny Rice-flower	<i>Pimelea spinescens</i> subsp. <i>spinescens</i>							X					
Trailing Hopbush	<i>Dodonaea procumbens</i>											X	X
White Sunray	<i>Leucochrysum albicans</i> subsp. <i>tricolor</i>											X	X

One EPBC Act-listed species was detected within the study area during these surveys – Matted Flax-lily. A total of 40 individuals were recorded in the habitat zone occupying an area less than 20m wide x 50m (0.1 ha). None of the other targeted species were recorded during the targeted surveys. Therefore, the remainder of threatened flora species are now considered unlikely to occur in the study area.

The location of Matted Flax-lily and native vegetation within the study area is shown in Figure 3.

2.4. Flora surveys

A flora assessment of the site was undertaken on the 26th March 2020 (see Appendix 1 for further details). In addition, targeted surveys for threatened flora species were conducted and are described below.

2.4.1. Matted Flax-lily

Targeted surveys were conducted on site to locate the EPBC Act listed species, Matted Flax-lily on 16th December 2020 (see Appendix 1). The surveys were undertaken in accordance with DAWE's survey guidelines for this species (DAWE 2021) and the Victorian survey guidelines (DSE 2010), including undertaking surveys during the flowering period for Matted Flax-lily (November to February) and walking transects spaced a maximum of three metres apart. GPS was used to record occurrences of the species.

2.4.2. Other listed flora species

Three targeted flora surveys were undertaken in 2020 on the dates listed below, targeting the species listed in Section 2.3.

- 8 July 2020;
- 5 November 2020; and
- 16 December 2020.

During each survey, transects spaced no more than three metres apart were visually searched throughout all suitable habitat in the study area, for the target species. This survey effort is consistent with Commonwealth Department Agriculture, Water and the Environment (DAWE) and State (DEECA) standards.

Table 2. Flora likelihood of occurrence table

Common Name	Scientific name	EPBC	Habitat	Number of records	Date of last record	Likelihood of occurrence
River Swamp Wallaby-grass	<i>Amphibromus fluitans</i>	VU	River Swamp Wallaby-grass grows mostly in permanent swamps and also lagoons, billabongs, dams and roadside ditches. The species requires moderately fertile soils with some bare ground; conditions that are caused by seasonally-fluctuating water levels (DAWE 2020b).	5	14/11/2006	No suitable habitat. Unlikely to occur.
Matted Flax-lily	<i>Dianella amoena</i>	EN	Lowland grassland and grassy woodlands on well-drained to seasonally waterlogged fertile sandy loams to heavy cracking soils derived from sedimentary or volcanic Geology. It is widely distributed from eastern to south-western Victoria (DAWE 2020b).	336	30/11/2018	40 plants recorded on site during targeted surveys zone occupying an area less than 20m wide x 50m (0.1 ha). Known to occur.
Small Golden Moths	<i>Diuris basaltica</i>	EN	Grows in herb-rich native grasslands, dominated by Kangaroo Grass (<i>Themeda triandra</i>) on heavy basaltic soils, often embedded with basalt boulders. All locations that the species is known to occur form part of the 'Natural Temperate Grassland of the Victorian Volcanic Plain' (DAWE 2020b).	1	19/09/1902	No suitable habitat. Unlikely to occur.
Trailing Hop-bush	<i>Dodonaea procumbens</i>	VU	Grows in low lying, often winter wet areas in woodland, low open-forest heathland and grasslands on sands and clays. Largely confined to SW of Victoria (DAWE 2020b).	None	N/A	Suitable habitat, but no records within 10 km. Not recorded during targeted surveys. Unlikely to occur.
Clover Glycine	<i>Glycine latrobeana</i>	VU	Found across south-eastern Australia in native grasslands, dry sclerophyll forests, woodlands and low open woodlands with a grassy ground layer. In Victoria, populations occur in lowland grasslands, grassy woodlands and sometimes in grassy heath (DAWE 2020b).	None	N/A	Suitable habitat, but no records within 10 km. Not recorded during targeted surveys. Unlikely to occur.
Adamson's Blown-grass	<i>Lachnagrostis adamsonii</i>	EN	Confined to slow moving creeks, swamps, flats, depressions or drainage lines that are seasonally inundated or waterlogged and usually moderately to highly saline. Appear to favour sites that have some shelter from the wind (DAWE 2020b).	4	1/01/1990	No suitable habitat. Unlikely to occur.
Basalt Peppercress	<i>Lepidium hyssopifolium</i> s.s.	EN	Known to establish on open, bare ground with limited competition from other plants. Previously recorded from Eucalypt woodland with a grassy ground cover, low open Casuarina woodland with a grassy ground cover and tussock grassland. Now generally found amongst exotic pasture grasses and beneath exotic trees (DAWE 2020b).	3	30/11/2017	Suitable habitat, and recent records. Not recorded during targeted surveys. Unlikely to occur.
White Sunray	<i>Leucochrysum albicans</i> subsp. <i>tricolor</i>	EN	Occurs in a wide variety of grassland, woodland and forest habitats, generally on relatively heavy soils. Plants can be found in natural or semi-natural vegetation and grazed or ungrazed habitat. Bare ground is required for germination. The unpalatability of this species is likely to protect it in heavily grazed areas where patches of bare ground are likely to develop, favouring recruitment (DAWE 2020b).	None	N/A	Suitable habitat, but no records within 10 km. Not recorded during targeted surveys. Unlikely to occur.
Spiny Rice-flower	<i>Pimelea spinescens</i> subsp. <i>spinescens</i>	CR	Occurs in grassland or open shrubland on basalt derived soils, usually comprising black or grey clays. Plants from more northerly populations occur on red clay complexes, while plants from southern populations occur on heavy grey-black clay loams. Topography is generally flat but populations may occur on slight rises or in slightly wettish depressions.	None	N/A	Suitable habitat, but no records within 10 km. Not recorded during targeted surveys. Unlikely to occur.
Maroon Leek-orchid	<i>Prasophyllum frenchii</i>	EN	Grows mainly in open sedge swampland or in wet grassland and wet heathland generally bordering swampy regions. Sites are generally low altitude, flat and moist. Soils are generally moderately rich damp sandy or black clay loams. Climate is mild, with an annual rainfall of 600–1100 mm, occurring predominantly in winter and spring (DAWE 2020b).	None	N/A	No suitable habitat. Unlikely to occur.
Leafy Greenhood	<i>Pterostylis cucullata</i>	VU	Tea-tree scrubs on tall sandy and calcareous dunes, in moist, open or even deep shaded locations (Jones 1994).	None	N/A	No suitable habitat. Unlikely to occur.

Common Name	Scientific name	EPBC	Habitat	Number of records	Date of last record	Likelihood of occurrence
Button Wrinklewort	Rutidosia leptorhynchoidea	EN	In Victoria restricted to open stands of plains grassland and grassy woodlands, on fertile clays to clay loams, usually in areas where the grass cover is more open, either as a result of recurrent fires or grazing by native macropods or stock. It also occurs on low rises with shallow, stony soils at less than 100 m above sea level.	None	N/A	Suitable habitat, but no records within 10 km. Not recorded during targeted surveys. Unlikely to occur.
Large-headed Fireweed	Senecio macrocarpus	VU	In Victoria, Large-fruit Fireweed occurs most commonly in grasslands on red-brown earth soils. It may also occur in grassy woodlands and open woodlands predominantly in the Western (Basalt) Plains grassland on red brown earth soils found on recent Quaternary (basalt) deposits (DAWE 2020b).	None	N/A	Suitable habitat, but no records within 10 km. Not recorded during targeted surveys. Unlikely to occur.
Swamp Fireweed	Senecio psilocarpus	VU	Herb-rich winter-wet swamps on volcanic clays or peaty soils (Walsh 1999). Known from approximately 10 sites between Wallan, about 45 km north of Melbourne, and Honans Scrub in south-eastern South Australia (TSSC 2008).	None	N/A	No suitable habitat. Unlikely to occur.
Spiral Sun-orchid	Thelymitra matthewsii	VU	Slightly elevated sites to 300m in well-drained soils (sandy loams to gravelly limestone soils) in light to dense forest; sometimes in coastal sandy flats (Weber & Entwistle 1994).	None	N/A	No suitable habitat. Unlikely to occur.
Swamp Everlasting	Xerochrysum palustre	VU	Grows in wetlands including sedge-swamps and shallow freshwater marshes, often on heavy black clay soils. Commonly associated genera include Amphibromus, Baumea, Carex, Chorizandra, Craspedia, Eleocharis, Isolepis, Lachnagrostis, Lepidosperma, Myriophyllum, Phragmites australis, Themeda triandra and Villarsia (DAWE 2020b).	1	29/11/2005	No suitable habitat. Unlikely to occur.

2.5. Fauna species

The EPBC Act PMST (DAWE 2020a) and VBA search (DELWP 2020) identified that 32 fauna species listed under the EPBC Act could potentially occur in the study area. The likelihood of occurrence table (Table 3) determined that there is suitable habitat for four of these species. These are:

- Fork-tailed Swift;
- White-throated Needletail;
- Golden Sun Moth; and
- Striped Legless Lizard.

Fork-tailed Swift and White-throated Needletail may occasionally fly over the study area but habitats there are unlikely to support these species for more than a short period of time while moving through the area. These species are therefore considered unlikely to be impacted by development in the area.

A small population of **Golden Sun Moth** was found to inhabit the site. A maximum of nine individuals were recorded on the wing during a single day (14 December 2020) and a total of 12 throughout the four-day survey. Only male GSM were recorded, but females were likely to have been overlooked due to their more cryptic habits (adult females rarely fly [DEWHA 2009]). GSM were mainly seen in areas of dense Chilean Needlegrass on the site. In addition to being of small extent (3 ha) this site is already isolated from other areas of GSM habitat, surrounded on all sides by factories, a road, car yards or warehouses.

Follow up surveys of GSM were undertaken in December 2025 and January 2026. No GSM were recorded during these recent surveys. On this basis, the study area is still considered to support marginal or degraded GSM habitat, with the species potentially persisting at low abundance likely only within areas supporting native grassy vegetation on undisturbed soil. The area supporting native vegetation within the study area totals 1.028 hectares.

The recorded locations of GSM are shown in Figure 4.

Despite intensive survey effort, no individuals of the **Striped Legless Lizard** were observed. In view of this finding and the isolated nature of this site, surrounded on all sides by unsuitable habitat (warehouses, car yard, a road, and no links to other potentially suitable habitat), and — having been regularly mowed — it is now considered unlikely that Striped Legless Lizard occurs within the site. There are therefore no regulatory implications for this reptile species on the site.

2.6. Fauna surveys

2.6.1. Golden Sun Moth

Targeted surveys for Golden Sun Moth were undertaken in accordance with DAWE's Survey Guidelines for this species (DEWHA 2009). The site was covered in its entirety by one or two observers walking parallel transects on four separate occasions. All surveys were conducted under conditions that were most conducive to the species' flight. Accordingly, surveys occurred on days with sunny conditions with light to moderate winds and ambient or shade temperature of 26 degrees or above.

The initial survey was a low intensity survey with transects at 50 metres apart. The second survey was completed with transects 25 metres apart. The third and fourth surveys used transects of 10 metres separation between observers. Golden Sun Moths on the wing are readily detectable up to 5 metres either side of a walked transect line.

Dates of the surveys aligned with the species' flying season. Survey dates were as follows:

- 25 November 2020

- 14 December 2020
- 30 December 2020
- 08 January 2021
- 19th December 2025
- 28th December 2025
- 2nd January 2026
- 8th January 2026

In addition, incidental observations were recorded while an observer was decommissioning the Striped Legless Lizard survey grid:

- 09 December 2020

The location of GSM recorded within the study area is shown in Figure 4.



Figure 4: GSM records and tile grid survey locations

Project: 276 Rex Road,
Campbellfield
Date: 14/01/2021

- ▭ Study area
- ▨ Plains Grassy Woodland (EVC 55)
- ★ GSM records
- ▭ SLL grid



Metres
0 25



PO Box 337, Camberwell, VIC 3124, Australia
www.natureadvisory.com.au
03 9815 2111 - info@natureadvisory.com.au

2.6.2. Striped Legless Lizard

Targeted surveys for Striped Legless Lizard were undertaken in accordance with DAWE's *Survey Guidelines for Australia's Threatened Reptiles* (DSEWPaC 2011a).

Victorian Grassland Earless Dragon (VGED) was not identified as having potential to occur onsite. This is due the site not supporting Plains Grassland, it being outside of the modelled range for the species, there being no historic records within 10 km, historic soil disturbance and a lack of suitable habitat characteristics. As such, given it was not found during targeted surveying with a method known to record the species (tile surveying), it can be confidently deemed to not occur within the study area.

One grid of house tiles was laid out in winter 2020 at the eastern end of the site in an area dominated by Kangaroo Grass. The use of house tiles is identified as a suitable method for both Striped Legless Lizard, as per their survey guidelines (DSEWPaC 2011b; DCCEEW 2024). The winter timing for tile laying is also consistent with survey guidelines, which specifies that tiles must be laid out at least one month/several weeks prior to the species' active period, which occurs during the warmer months (DSEWPaC 2011b; DCCEEW 2024). The location of the tile grid is shown in Figure 4.

As per the array formation and tile density specified in the survey guidelines, a grid of 50 tiles was laid out 5 metres apart in a 10 x 5 grid formation (i.e. covering 20 x 45 metres extent). This was considered suitable for the site, given the site is approximately 3-hectares and the guidelines specify the requirements of one array per 3-hectares (DSEWPaC 2011b). To maximise the chances of detecting Striped Legless Lizard, the grid was positioned in areas deemed most suitable to support the species, primarily consisting of the remaining Kangaroo Grass-dominated habitat in the east of the study area.

Each tile was checked fortnightly over the three-month period in the morning, when it is expected that temperatures under the tiles are optimum for SLL, i.e. between 15 and 25 degrees C. If temperatures were unsuitable for SLL (i.e. <15 degrees C), tile checks were delayed to a later part of the morning. Although the Department of Energy, Environment and Climate Action (DEECA, formerly DSE) suggests surveys occur over six months, the guidelines specify that surveys can occur over several weeks (DSEWPC 2011b). Given the limited size of the site, a three-month survey period was considered appropriate.

Any SLL observed were to be counted and GPS co-ordinates of any observation taken. Other species of reptile or small mammal were documented if found under the tiles.

Dates of the surveys were as follows:

- 18 September 2020
- 02 October 2020
- 16 October 2020
- 27 October 2020
- 12 November 2020
- 25 November 2020
- 09 December 2020

2.7. Adequacy of assessment

Surveys for all MNES values were conducted in accordance with the methods prescribed for each target species' published guidance (DAWE 2021; DEWHA 2010; DSEWPaC 2011a; Robertson P & Cooper P 2000).

It is understood that targeted surveys are valid for a five-year period and are required to be up to date upon submission of documentation. As such GSM targeted surveys were repeated in 2025/2026.

Upon discussion with the relevant authority (DCCEEW), it was concluded that no further targeted surveys for MNES values such as MFL would be required. This conclusion was reached due to the understanding that all significantly impacted values are to be salvaged and translocated to accommodate the proposed action. As such, a pre-clearance survey will be undertaken in which all individual values observed will be salvaged and translocated to the designated translocation site.

All relevant databases were examined. VBA records within 5km are shown in Figure 5.

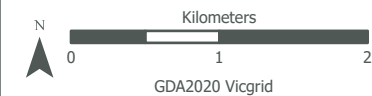
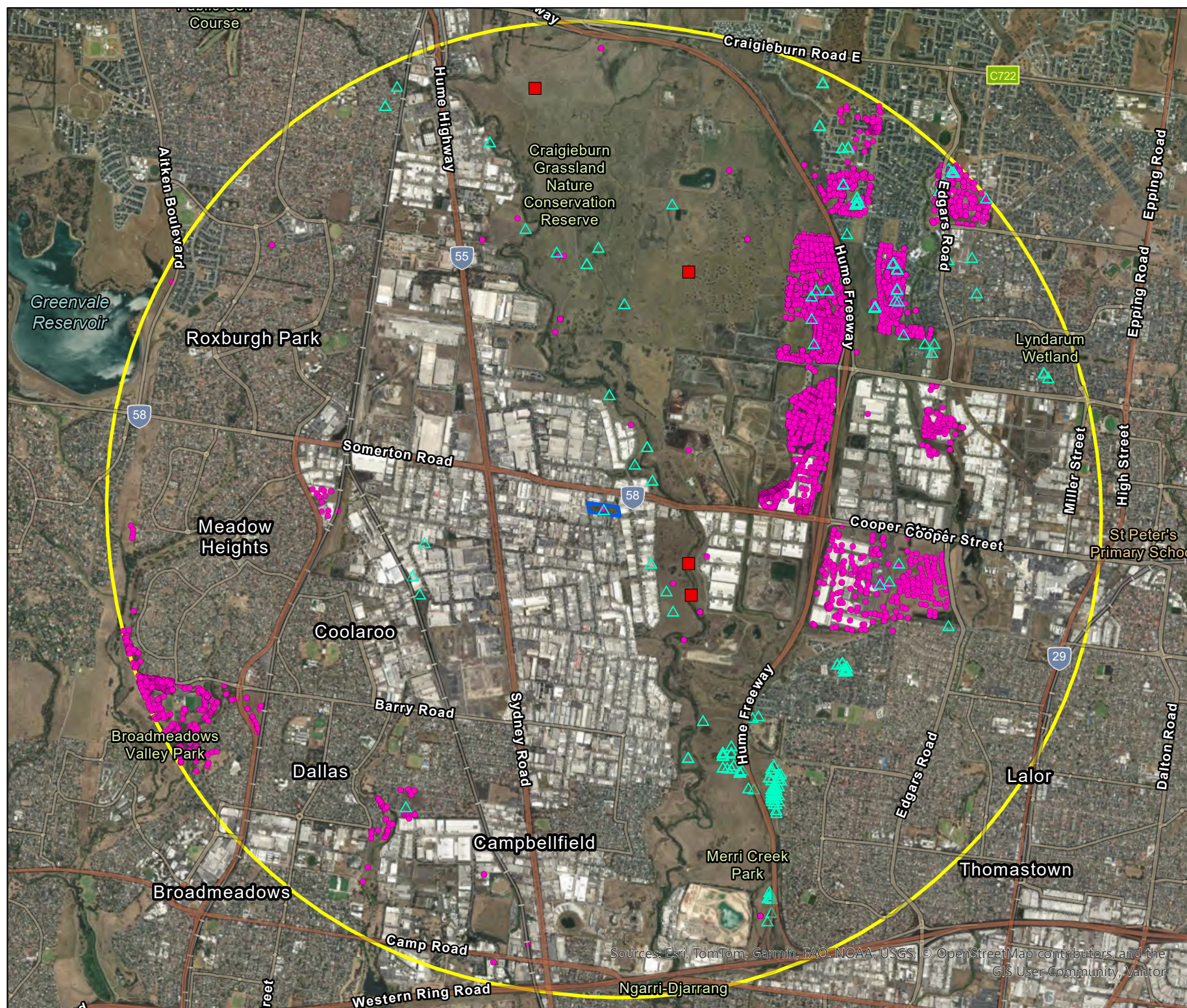
Figure 5: Historical VBA records of target flora and fauna species within 5km of the proposed action area

Project No: 20045.04
Project: 276 Rex Road, Campbellfield, VIC
Date: 14/01/2026

- Study area
- Search region (5km buffer of study area)

Threatened species records

- Golden Sun Moth
- ▲ Matted Flax-lily
- Striped Legless Lizard



PO Box 337, Camberwell, VIC 3124, Australia
www.natureadvisory.com.au
 03 9815 2111 - info@natureadvisory.com.au

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Vantor

Table 3. Fauna likelihood of occurrence

Common Name	Scientific name	EPBC-T	EPBC-M	Habitat	Number of records	Date of last record	Likelihood of occurrence
Birds							
Australasian Bittern	<i>Botaurus poiciloptilus</i>	EN		Terrestrial wetlands, including a range of wetland types but prefers permanent water bodies with tall dense vegetation, particularly those dominated by sedges, rush, reeds or cutting grass (Marchant & Higgins 1990).	1	9/04/2019	No suitable habitat. Unlikely to occur.
Australian Painted-snipe	<i>Rostratula australis</i>	EN		Generally inhabits shallow terrestrial freshwater wetlands, including temporary and permanent lakes, swamps and claypans. They also use inundated or waterlogged grassland or saltmarsh, dams, rice crops, sewage farms and bore drains. Typical sites include those with rank emergent tussocks of grass, sedges, rushes or reeds, or samphire; often with scattered clumps of lignum <i>Muehlenbeckia</i> or canegrass or sometimes tea-tree (<i>Melaleuca</i>). Sometimes utilises areas that are lined with trees, or that have some scattered fallen or washed-up timber (DAWE 2020b).	1	9/04/2019	No suitable habitat. Unlikely to occur.
Black-faced Monarch	<i>Monarcha melanopsis</i>		M (Bonn A2H)	Rainforests, eucalypt woodlands, coastal scrub and damp gullies (Higgins et al. 2006)	None	N/A	No suitable habitat. Unlikely to occur.
Curlew Sandpiper	<i>Calidris ferruginea</i>	CR	M (Bonn A2H, ROKAMBA, JAMBA, CAMBA)	Inhabits wide range of coastal or inland wetlands with varying levels of salinity; mainly muddy margins or rocky shores of wetlands (Higgins & Davies 1996).	1	9/04/2019	No suitable habitat. Unlikely to occur.
Eastern Curlew	<i>Numenius madagascariensis</i>	CR	M (Bonn A1, ROKAMBA, JAMBA, CAMBA)	Inhabits sheltered coasts, especially estuaries, embayment, harbours, inlets and coastal lagoons with large intertidal mudflats or sandflats, often with beds of sea grass (Higgins & Davies 1996).	1	9/04/2019	No suitable habitat. Unlikely to occur.
Fork-tailed Swift	<i>Apus pacificus</i>		M (CAMBA, ROKAMBA, JAMBA)	The species can occur in wet sclerophyll forest but mainly prefers open forest or plains. It is almost exclusively aerial and feeds up to hundreds of metres above the ground, but can feed among open forest canopy. The species breeds internationally and seldom roosts in trees (Higgins 1999).	None	N/A	Aerial insectivore with large foraging areas. Potential to occur.
Hooded Plover	<i>Thinornis cucullatus</i>	VU		Inhabits sandy ocean beaches, especially those that are broad and flat, with a wide wave-wash zone for feeding. Widespread and scattered across coastal Victoria. Numbers reduced due to disturbance by recreational activities on beaches (Marchant & Higgins 1993).	None	N/A	No suitable habitat. Unlikely to occur.
Painted Honeyeater	<i>Grantiella picta</i>	VU		Inhabits box-ironbark forests and woodlands and mainly feeds on the fruits of mistletoe. Strongly associated with mistletoe around the margins of open forests and woodlands. Can also be found in farmland containing remnant treed vegetation. Occurs at few localities. Uncommon breeding migrant from further north, arriving in October and leaving in February (Higgins et al. 2001; Tzaros 2005).	1	9/04/2019	No suitable habitat. Unlikely to occur.

Common Name	Scientific name	EPBC-T	EPBC-M	Habitat	Number of records	Date of last record	Likelihood of occurrence
Plains-wanderer	<i>Pedionomus torquatus</i>	CR		This species is highly sensitive to changes in grassland cover and density. Typically inhabits treeless native grasslands with sparse cover, with a preference for grasslands composed of wallaby grass and spear grass (Marchant & Higgins 1993). Habitat becomes unsuitable when grassland becomes dense (CA 2016). Evidence suggests it avoids areas of tree cover, with no records of the species within 300m of trees (>10m high) in their strongholds in New South Wales or Victoria (DoE 2016).	8	9/04/2019	Habitat in the study area is small and isolated by urban development. Unlikely to occur.
Regent Honeyeater	<i>Anthochaera phrygia</i>	CR		Inhabits dry box-ironbark eucalypt forests near rivers and creeks on inland slopes of the Great Dividing Range. Can also occur in small remnant patches or in mature trees in farmland or partly cleared agricultural land (Higgins et al. 2001).	3	9/04/2019	No suitable habitat. Unlikely to occur.
Rufous Fantail	<i>Rhipidura rufifrons</i>		M (Bonn A2H)	In east and south-east Australia, mainly inhabits tall wet sclerophyll forests, often in gullies. When on passage in warmer months, they are sometimes recorded in drier sclerophyll forests and woodlands, as well as parks and gardens (Higgins et al. 2006). Virtually absent from south-eastern Australia during winter (Higgins et al. 2006).	None	N/A	No suitable habitat. Unlikely to occur.
Satin Flycatcher	<i>Myiagra cyanoleuca</i>		M (Bonn A2H)	Mostly found in eucalypt forest, particularly tall wet forests and woodland within gullies (Higgins et al. 2006). Also inhabits eucalypt woodland comprising an open understorey and a grassy ground layer (Higgins et al. 2006). Generally absent from rainforest (Higgins et al. 2006).	None	N/A	No suitable habitat. Unlikely to occur.
Superb Parrot	<i>Polytelis swainsonii</i>	VU		Occurs in eucalypt dominated forests and woodlands, namely comprised of River Red-gum, Yellow Box and Grey Box, with seasonal occurrences in box-pine and Boree woodland (Baker-Gabb 2011). The species range extends along major riverine systems and the inland slopes of the Great Divide, stretching from central Victoria to north of Tamworth in NSW. Breeds in hollow branch or trunk of tall eucalypts within 9 km of feeding areas. Mostly feeds in box woodlands and wooded farmlands; less often in riparian forests (Higgins 1999).	2	1/01/1940	No suitable habitat. Unlikely to occur.
Swift Parrot	<i>Lathamus discolor</i>	CR		Prefers a select range of eucalypts in Victoria, including Yellow Gum, Grey Box, White Box, Red Ironbark and Yellow Box, as well as River Red-gum when this species supports abundant 'lerp' (Saunders & Tzaros 2011). The species is also known to forage within planted stands of Spotted Gum and Sugar Gum (Nature Advisory; unpublished data). Breeds in Tasmania and migrates to the mainland of Australia for the autumn, winter and early spring months. It lives mostly north of the Great Dividing Range, passing through two areas of Victoria on migration: the Port Phillip district and Gippsland (Emison et al. 1987; Higgins 1999; Kennedy & Tzaros 2005). Though it is also not uncommonly sighted in urban areas (Nature Advisory; unpublished data). Occurrence of this species on the mainland can substantially change from year to year depending on food availability, giving potential for this species to occur almost anywhere throughout its range (Emison et al. 1987).	16	9/04/2019	No suitable habitat. Unlikely to occur.
White-throated Needletail	<i>Hirundapus caudacutus</i>	VU	M (CAMBA, ROKAMBA, JAMBA)	Aerial, over all habitats, but probably more over wooded areas, including open forest and rainforest. Often over heathland and less often above treeless areas such as grassland and swamps or farmland (Higgins 1999).	11	9/04/2019	Aerial insectivore with large foraging areas. Potential to occur.

Common Name	Scientific name	EPBC-T	EPBC-M	Habitat	Number of records	Date of last record	Likelihood of occurrence
Yellow Wagtail	Motacilla flava		M (CAMBA, JAMBA, ROKAMBA)	Regular non-breeding visitor in northern Australia mainly spring-summer, vagrant to the south. Occupies a wide range of habitats, usually open areas with low vegetation such as crop, grassland and even parkland. Often recorded near water (Higgins, Peter & Cowling 1999)	None	N/A	No suitable habitat. Unlikely to occur.
Fish							
Australian Grayling	Prototroctes maraena	VU		Large and small coastal streams and rivers with cool, clear waters with a gravel substrate and altering pools and riffles (Cadwallader & Backhouse 1983).	None	N/A	No suitable habitat. Unlikely to occur.
Dwarf Galaxias	Galaxiella pusilla	VU		Ranges from the far west of the state through to the Mitchell River basin in central Gippsland. Vegetated margins of still water, ditches, swamps and backwaters of creeks, both ephemeral and permanent (Allen et al. 2002). Some wetlands where it occurs may partially or completely dry up during summer, with such wetlands reliant on seasonal flooding plus linkages to other sites where the species occurs, for habitat and population replenishment (Saddler, Jackson & Hammer 2010). Dwarf Galaxias is also often found in association with burrowing freshwater crayfish (Engaeus spp.), with the crayfish burrows reportedly providing refuge from predators and dry conditions for the species (Saddler, Jackson & Hammer 2010).	None	N/A	No suitable habitat. Unlikely to occur.
Macquarie Perch	Macquaria australasica	EN		Cool, clear water of rivers and lakes. Favours slower moving water (Allen et al. 2002).	8	1/01/1970	No suitable habitat. Unlikely to occur.
Murray Cod	Maccullochella peelii	VU		Slow flowing turbid water of rivers and streams of low elevation; also fast flowing clear upland streams (Allen et al. 2002).	1	20/06/2012	No suitable habitat. Unlikely to occur.
Yarra Pygmy Perch	Nannoperca obscura	VU		Streams and small lakes, prefers flowing water with abundant aquatic vegetation (Allen et al. 2002).	None	N/A	No suitable habitat. Unlikely to occur.
Frogs							
Growling Grass Frog	Litoria raniformis	VU		Permanent, still or slow flowing water with fringing and emergent vegetation in streams, swamps, lagoons and artificial wetlands such as farm dams and abandoned quarries (Clemann & Gillespie 2004).	293	31/12/2019	No suitable habitat. Unlikely to occur.
Invertebrates							
Eltham Copper Butterfly	Paralucia pyrodiscus lucida	EN		Its occurrence is dependent upon a close association between a dwarfed form of the Sweet Bursaria and colonies of a Notoncus sp. of ant, with the species unable to survive without the presence of the Notoncus ant (SWIFFT 2019). In the Eltham area of its range, this Butterfly appears to require well-drained gentle slopes, with a north to west aspect. Its known habitat is sparse dry woodland (Webster 2003).	2	9/04/2019	No suitable habitat. Unlikely to occur.

Common Name	Scientific name	EPBC-T	EPBC-M	Habitat	Number of records	Date of last record	Likelihood of occurrence
Golden Sun Moth	Synemon plana	CR		Areas that are, or have been native grasslands or grassy woodlands. It is known to inhabit degraded grasslands with introduced grasses being dominant, with a preference for the native wallaby grass being present (DEWHA 2009). Also known to be closely associated with exotic grass species, with populations found in grassland almost entirely composed of Chilean needlegrass (Richter et al. 2013).	4070	17/12/2019	Recorded on site. Known to occur.
Mammals							
Eastern Barred Bandicoot	Perameles gunnii	VU		The habitat of the Eastern Barred Bandicoot (mainland) is perennial tussock grassland and eucalypt woodland with a grassy ground layer (Dufty 1994b; Seebeck 1995a, 2001). Drainage lines and areas of high vegetative cover have been identified as prime habitat. The key determining factor for persistence of this species appears to be high structural complexity and heterogeneity within the environment, reflected in its absence from agricultural areas but persistence in rubbish dumps and other variable habitats.	10	3/06/2018	Habitat within the study area is isolate from known population by extensive urban development. Unlikely to occur.
Eastern Quoll	Dasyurus viverrinus	EN		Probably extinct in mainland Australia. Inhabits a range of open forest, scrubland and heath (Menkhorst 1995).	4	1/01/1910	No suitable habitat. Unlikely to occur.
Grey-headed Flying-fox	Pteropus poliocephalus	VU		Brisbane, Newcastle, Sydney and Melbourne are occupied continuously. Elsewhere, during spring, they are uncommon south of Nowra and widespread in other areas of their range. Roosts in aggregations of various sizes on exposed branches. Roost sites are typically located near water, such as lakes, rivers or the coast. Roost vegetation includes rainforest patches, stands of Melaleuca, mangroves and riparian vegetation, but colonies also use highly modified vegetation in urban and suburban areas (DAWE 2020b).	16	18/02/2020	No suitable habitat. Unlikely to occur.
Southern Greater Glider	Petauroides volans	VU		In Victoria, this species inhabits forest habitats dominated by peppermint, stringybark, ash and gum eucalypts (Menkhorst 1995). Restricted to the central highlands and eastern Victoria, and common in areas of high rainfall. Rare in dry stringybark-box and Snow Gum forest, and does not occur in the box-ironbark or River Red-gum dominated riverina regions (Menkhorst 1995).	1	9/04/2019	No suitable habitat. Unlikely to occur.
Spot-tailed Quoll	Dasyurus maculatus maculatus	EN		Rainforest, wet and dry forest, coastal heath and scrub and River Red-gum woodlands along inland rivers (Menkhorst 1995).	3	9/04/2019	No suitable habitat. Unlikely to occur.
Reptiles							
Grassland Earless Dragon	Tympanocryptis pinguicolla	EN		The species is confined to native tussock grassland on basalt plains north and west of Melbourne (Robertson & Cooper 2000).	None	N/A	Unsuitable habitat. Not recorded during targeted surveys. Unlikely to occur.

Common Name	Scientific name	EPBC-T	EPBC-M	Habitat	Number of records	Date of last record	Likelihood of occurrence
Pink-tailed Worm-Lizard	<i>Aprasia parapulchella</i>	VU		Sites where the species is found generally include rocky outcrops or scattered partly buried rocks. This species is diurnal and largely fossorial, sheltering under rocks and vegetation, and in the burrow passages of small ants and termites within grassland and woodland habitats of south-eastern Australia (Robertson & Coventry 2019). It feeds primarily on the larvae and eggs of ants. In Victoria, the species is largely restricted to box-ironbark woodland in the greater Bendigo region, though it may also persist elsewhere in the state (Robertson & Coventry 2019).	1	9/04/2019	No suitable habitat. Unlikely to occur.
Striped Legless Lizard	<i>Delma impar</i>	VU		Grassland specialist. Known to occur in some areas dominated by introduced species such as Harding Grass <i>Phalaris aquatica</i> , Serrated Tussock <i>Nassella trichotoma</i> and Flatweed <i>Hypochaeris radicata</i> and at sites with a history of grazing and pasture improvement. shelter in grass tussocks, thick ground cover, soil cracks, under rocks, spider burrows, and underground debris such as timber. The majority of sites in Victoria and NSW occur on cracking clay soils with some surface rock which provide shelter for the species (DAWE 2020b).	5	9/04/2019	Suitable habitat. Not recorded during targeted surveys. Now considered unlikely to occur.

3. Relevant Impacts

The impacts of the project on MNES are described below. Figure 3 shows the ecological features within the development layout, including Matted Flax-lily locations while Figure 4 shows the location of Golden Sun Moth records.

3.1. Direct impacts to MNES

The proposed development will directly impact on two MNES — Matted Flax-lily and Golden Sun Moth. These impacts are described below. No other MNES will be directly impacted by the proposed development.

3.1.1. *Matted Flax-lily*

The proposed development will result in the loss of a small population of Matted Flax-lily from the study area, consisting of 40 confirmed individuals. A total of 0.1 ha of Matted Flax-lily habitat, comprising Plains Grassy Woodland (EVC 55), will be impacted by the proposed action.

Matted Flax-lily habitat was variable throughout the site and was overall of moderate quality. The canopy component of the Plains Grassy Woodland EVC was absent within the mapped habitat zone, and understory structure and species richness were sub-optimal. A number of lifeforms were present; however, cover and species richness were below the prescribed benchmark for the EVC. The suboptimal quality of some habitat characteristics has likely resulted from the impacts of past illegal clearing and ongoing weed invasion post-disturbance. Subsequent to this, only 1.03 ha of suitable habitat now remains.

3.1.2. *Habitat for Golden Sun Moth*

The proposed development will result in the loss of 1.028 hectares of marginal or degraded GSM habitat, with the species potentially persisting at low abundance likely only within areas supporting native grassy vegetation on undisturbed soil. This habitat comprises native vegetation. A total of 12 individuals were recorded over a four-day survey undertaken during November and December 2020, and January 2021. GSM was not recorded in four-day surveying in 2025/2026. Despite the 2025/2026 survey results, it is still assumed that a small population potentially persisting in areas of native vegetation. However, GSM is otherwise considered unlikely to occur in the disturbed portion of the site. Given that only a small population is present (if any), the proposed development is unlikely to have a significant impact on this species.

3.2. Indirect impacts on MNES

The proposed development is not expected to indirectly impact on any MNES, as the site is isolated from other areas of similar habitat in the surrounding landscape, and surrounded on all sides by industrial development (factories/warehouses, a road, car yards).

However, habitat fragmentation is a known and increasing issue in the broader landscape context. Though the removal of MNES values from the site may have minimal indirect impacts to the site area itself, throughout the wider landscape habitat is becoming increasingly scarce for these values due to the mosaic like removal of environmental values.

Due to the site area's location being within a well-established industrial zone, it is unlikely that the proposed action will further fragment important habitat, particularly for Matted Flax-lily, as the site is completely isolated from any environmental corridors or biolinks.

3.3. Duration of impact

As the proposed action will see the entirety of the site developed, duration of impacts will be in perpetuity. Impacts to Matted Flax-lily and Golden Sun Moth habitat will be permanent and irreversible due to the nature of the proposed action. However, impacts to Matted Flax-lily will be minimised through salvage and translocation of individuals, and they will continue to subsist at the translocation site. In addition, the translocation site will be managed as an offset site to compensate for impacts to MFL.

The proposed action is unlikely to result in repeated impacts to MNES values as once the proposed action has been completed no MNES values will exist within the site. As such, any further works or maintenance will not re-impact these values.

3.4. Risks to MNES during construction

Construction of any development has the potential to introduce and spread weeds and disease. The proposed action is *unlikely* to introduce these risks to MNES values.

Risks to Matted Flax-lily during construction will be largely avoided through the salvage and translocation of individual specimens on site. As the proposed action will develop the entire site, risks to MNES values are minimal as these values will no longer exist in the site during and post construction.

Furthermore, construction is unlikely to pose any risks to Golden Sun Moth due to the species mobile nature and the relatively limited amount of habitat present, which is to be removed as a result of the proposed action.

3.5. Predicting potential unknown impacts

Due to the scope of the proposed action, any residual or unpredictable impacts to MNES values are unlikely to occur at the subject site.

There is the potential for population mortality to occur to translocated individuals of Matted Flax-lily if mismanagement or a stochastic event were to arise. However, Matted Flax-lily individuals will be propagated, cloned, and cared for by the approved nursery (Nature Advisory 2025), to ensure the ongoing survival of the population in the case of an unpredictable event.

In addition, the translocation site will be managed as an offset site to compensate for impacts to MFL (Nature Advisory 2026).

4. Proposed Avoidance and Mitigation Measures

4.1. Avoidance of impacts

Efforts to avoid and minimise impacts to native vegetation are presented as follows:

Strategic level planning

The parcel of land located at 276 Rex Road, Campbellfield is one of the only remaining sites within the Hume City Council LGA which is appropriately zoned with close access and connectivity to the freeway, making this parcel of land highly desirable from logistics and similar use industrial tenants.

Site level planning

Given the central location of existing native vegetation on site and the required infrastructure to service each of the proposed lots, it is deemed very difficult to avoid or minimise any impact to the native vegetation and Matted Flax-lily present. Any industrial use on the site, for which the property is zoned, typically requires c. 40 to 60% site coverage to make it feasible from an operational perspective, and due to the dimensions of the site and location of the vegetation and Matted Flax-lily it would not be possible to utilise the property for industrial purposes whilst retaining vegetation on site.

The proponent advises no feasible opportunities exist to avoid and minimise impacts on native vegetation without undermining the key objectives of the proposal.

Given the above consideration, Hume City Council has issued a planning permit (P23308.01) for the industrial development as proposed.

4.2. Mitigation of Impacts

4.2.1. Matted Flax-lily

A salvage and translocation plan for the 40 Matted Flax-lily plants from the study area has been developed (Nature Advisory 2025, Appendix 1), in accordance with the conditions of the Hume City Council-issued Planning Permit (P23308.01). The 40 Matted Flax-lily plants will be translocated to a secure council owned and managed reserve at Cunningham Chase, Burnside Heights (Lot S PS523266). This translocation will be undertaken in accordance with the *EPBC Act Translocation Policy* (DSEWPac 2013). Sensitive management to support the success of translocation will subsequently occur over a five-year period. This management will be overseen by Melton City Council who are experienced in successfully managing translocations of *Dianella* and other endangered species.

Prior to the salvage and translocation of Matted Flax-lily plants, a pre-clearance survey will be conducted by a suitably qualified botanist to ensure all individuals are appropriately recorded and salvaged.

Furthermore, an offset management plan (OMP) has been developed to support the conservation management of the translocation site and its surrounding vegetation within 0.662 ha (Nature Advisory 2026, Appendix 2). This plan is to be implemented over a 10-year period.

Effectiveness of translocation

Several studies have been undertaken on plant translocation and its success in mitigating risk to threatened species. A literature review undertaken by Silcock J.L. et al. discusses that several factors can contribute to translocation success, including number of propagules, microsite

selection, and long-term project commitment (2019). It is of particular importance to note that habitats which have higher biomass levels tend to have less success due to a lack of inter-tussock space for propagules to germinate, whereas degraded sites may support better translocation success due to lower competition (2019). Furthermore, aftercare post translocation is critical to the success and survival of the translocation individuals. Most common aftercare techniques for success include reduced competition, plant protection, and water irrigation (Corli A *et al.* 2023).

The translocation site is of moderate quality and is currently managed by Melton City Council. The Salvage and Translocation Plan (Nature Advisory 2025, Appendix 1) and the Offset Management Plan (Nature Advisory 2026, Appendix 2) adequately address the above management measures to best ensure the success and survival of translocated Matted Flax-lily's. Based on ongoing research, published literature the semi-degraded nature of the translocation site, the proposed mitigation measures for Matted Flax-lily should be effective in its success.

5. Residual Impacts and Proposed Offsets

Bamford Management Pty Ltd are committed to managing the risks on MNES through significant commitments to adequately offsetting impacts.

5.1. Golden Sun Moth

A total of 1.028 ha of native vegetation in the development site, being marginal or degraded Golden Sun Moth habitat, will be impacted. As GSM was not recorded during targeted surveys during 2025/2026, it is unlikely that these impacts will be significant. As such, no offset in accordance with DAWE's *EPBC Act Environmental Offsets Policy* (DSEWPaC 2012) should be required.

Since the original surveys for GSM in 2020, the extent of habitat thought suitable for the species has decreased to the 1.028 hectares of remaining native vegetation. All other areas within the study area have been subject to soil disturbance and so are no longer considered as suitable habitat. Areas subject to soil disturbance should never have been considered as suitable for GSM.

The habitat remaining is marginal or degraded Golden Sun Moth habitat. The reduction in extent due to historic soil disturbance has increased the fragmentation and isolation of this population (if it exists anymore). GSM was not recorded during targeted surveys during 2025/2026. On this basis, the study area is still considered to support marginal or degraded GSM habitat, with the species potentially persisting at low abundance. Additionally, all other lots in the estate have now been developed so there is no chance that any other population of GSM exists in the near vicinity.

5.2. Matted Flax-Lily

The salvage and translocation plan prepared by Nature Advisory (Appendix 1) has been informed by the expert advice of suitably-qualified ecologists, as well as government guidelines for the translocation of threatened flora species and with input from Environment Officers at both Hume City Council and Melton City Council.

The plan proposes translocation of 120 plants, propagated from the original 40 plants, to Lot S PS523266, Cunningham Chase, Burnside Heights, within a management area of approximately one hectare. The site has been actively managed as a grassland reserve by Melton City Council and currently supports high-quality native grassland. Although the translocated Matted Flax-lily would have previously occurred in grassy eucalypt woodland, the species is known to favour both grassland and grassy woodland. Furthermore, the proposed offset site has prior records of Matted Flax-lily, further highlighting its suitability. Based on these characteristics, this represents an ideal site for translocation and will be conducive to successful establishment.

The plan also considers a five-year timeframe, during which sensitive ecological management measures will be implemented to support successful establishment of translocated individuals. These measures address key threats, such as weed pressures, pest animals, macropod herbivory and inappropriate access. Should mortality occur over this period, a security population derived from translocated plants will enable further infill plantings and ensure that there is no net loss of Matted Flax-lily from this proposal. On this basis, there is a high probability of successful salvage and translocation of Matted Flax-lily.

It should also be noted that the management of the translocation site will appropriately compensate for impacts to Matted Flax-lily habitat arising from this proposal. The extent of habitat removed has been determined as the area occupied by the 40 plants, as 0.1 ha (20m x 50m). The translocation plan requires management of an approximately 1900m² area, given the required 2m separation for each of the 120 translocated plants. The offset site, totalling 0.662 ha, is also of

significantly greater quality, given it occurs within a large native grassland reserve managed by Melton City Council. Therefore, the habitat managed within the offset site equates to more than six times the extent of impacted habitat.

5.2.1. Offset site

A field assessment of the offset site (0.662 hectare in size) was undertaken on 12 January 2026, in which the study was assessed for native vegetative values. This assessment was conducted by a DEECA-accredited botanist that was experienced in the applying the Habitat Hectares Method. Areas which were found to support such values were mapped, assessed, and scored using the Habitat Hectares Method (DSE 2004).

The offset site is of moderate quality and supports heavy red and brown basaltic soils. Vegetation comprised a variety of native grasses and herbs, as well as exotic grasses and broad-leaf herbaceous weeds. Dominant native species at the translocation site included Kangaroo Grass, Spear Grass *Austrostipa* spp., Grassland Wood-sorrel *Oxalis perennans*, and Black Cotton-bush *Maireana decalvans*. Dominant weeds included Wild Oat *Avena fatua*, Ribwort *Plantago lanceolata*, and Ox-tongue *Helminthotheca echinoides*.

The quality of the offset site is comparatively much higher than that of the impact site. Species diversity and richness was moderate-high throughout the offset site and provides adequate inter-tussock space for the recruitment of Matted Flax-lily and other native species.

Threats

The offset site is located within public land and is managed ongoingly by Melton City Council. Ongoing threats to the offset site include the browsing of vegetation by native herbivores, which is currently being managed. Other potential threats which may inhibit management success include access to the offset site from unauthorised peoples, specifically pedestrians, who live around the grassland. However, as detailed in the Offset Management Plan (Nature Advisory 2026), permanent fencing is to be installed around the MNES values where they abut walking tracks.

Weed competition may also pose a threat to MNES values in the offset site. Though weeds are regularly managed and controlled by Melton City Council, there is the potential for weedy biomass to accumulate and outcompete MNES values.

6. Other Approvals and Conditions

6.1. Zoning

The site is currently zoned Industrial 1 Zone (IN1Z) and abuts other IN1Z land to the north, south, east and west.

The proposal to develop this property for industrial purposes is consistent with its zoning and the strategic planning direction for the North Growth Corridor (GAA 2012), which provides for additional urban areas and nearby employment activities to accommodate Melbourne's growing population.

6.1. State planning provisions

State planning provisions are established under the *Victorian Planning and Environment Act 1987*.

Clause 52.17 of all Victorian Planning Schemes states that:

- A permit is required to remove, destroy or lop native vegetation, including dead native vegetation.

A planning permit under Clause 52.17 of the Hume Planning Scheme has been issued by Hume City Council for the removal of native vegetation from the study area and the development of an industrial development, as proposed.

7. Social and Economic Benefits

The proposed development at 276 Rex Road, Campbellfield is a major employment-based development which is designed to be developed as an A-grade industrial estate, incorporating small-medium format industrial uses. This development will create employment opportunities to residents within the local council area (LGA) employment catchment while also providing a desirable location for new industrial enterprises to operate, facilitating economic growth and job diversity in the area. The project seeks to support provision of jobs during both construction and operational phases, with an anticipated 100 full time equivalent jobs during operation. The site benefits from being located in a highly desirable position within the wider metropolitan freight network, core industrial precinct and will contribute to the continued economic success of the LGA. The site benefits from direct connectivity to the Hume Highway, Hume Freeway, Melbourne Airport and the Craigieburn/Seymour train line, providing ease of access to key arterial networks for logistics and warehousing businesses and accessibility for employees, factors that will substantially contribute to the success of the development.

8. Environmental Record of Persons Proposing to Take the Action

The proponent has not been the subject of any environmental protection proceedings and has no history of breaches of any environmental legislation.

The subdivision works will be managed and overseen by competent Design Engineers, Landscape Architects and Project Managers, including a Site Environmental Manager.

Additionally, the applicant will retain the services of an Ecological Consultant for further advice, supervision and any reporting requirements that may arise.

The Contractors appointed to complete the Civil and Landscape works across the various stages will be bound to an Environmental Management Plan, prepared by the Engineering Consultant with inputs from the Ecological Consultant, which will be part of the Works Contract. This plan will include the mitigation measures detailed in Section 4.

9. Ecologically Sustainable Development

The facilities are designed to incorporate modern Environmentally Sustainable Design (ESD) requirements that will guide the development of facilities in line with modern sustainability and environmental practices that are also designed for maximum operational efficiency. The facilities have been designed with consideration for the surrounding local context, providing a high-quality urban design response that is coherent with the design of the surrounding industrial buildings, incorporating modern sustainable and environmentally friendly materials to increase the operational energy efficiency of the buildings. These measures have been taken to ensure the proposed development promotes the area as one of significant industrial value.

10. Conclusion

The proposed development of the site for industrial use is considered as appropriate, given the industrial context in which the site is located, the current industrial zoning of the land (IND1Z), and the sites disconnection from any similar habitat in the surrounding region. The development has been issued a planning permit by Hume City Council (P23308.01).

The site represents a very small fragment of habitat within a highly fragmented landscape that is simply not favourable for the persistence and protection of environmental values. Even if the site were to be set aside and managed for conservation, it is unlikely that the MNES in question (Matted Flax-lily and Golden Sun Moth) would be able to maintain population viability into the future, due to ongoing threats from industrial activity (such as dumping of fill and chemicals, overshadowing), lack of genetic diversity, disruption of plant-pollinator interactions, encroachment of weeds, and even management threats such as trampling, inappropriate disturbance regime and off-target herbicide damage.

While it is unfortunate that the small population of Matted Flax-lily will be directly impacted, a salvage and translocation plan for the 40 Matted Flax-lily plants has been developed by Nature Advisory, in accordance with the conditions of the Hume City Council-issued permit (P23308.01). This plan has been guided by expert advice, and it is expected that there will ultimately be a net gain to the population of Matted Flax-lily. Additionally, the extent of the habitat managed under this translocation plan is four times greater than the extent of impacted Matted Flax-lily habitat and it is of higher quality. Therefore, it is expected that this will also appropriately compensate for impacted Matted Flax-lily habitat onsite. In addition impacts to MFL will be offset via appropriately managing and securing in perpetuity a 0.662 ha area of suitable MFL habitat in the form of NTGVVP.

Moreover, the social and economic benefits of the proposed development will be substantial, creating employment opportunities for local residents while also providing a desirable location for new industrial enterprises to operate, facilitating economic growth and job diversity in the local council area..

In addition, the proposed development has been designed to incorporate modern Environmentally Sustainable Design (ESD) requirements that will guide the development of facilities in line with modern sustainability and environmental practices.

11. Information Sources Provided in the Preliminary Documentation

Sources of information on the MNES of the development site and its surrounds are provided below. This includes both existing information and on-site field surveys in the last five years. Reliability of the surveys is based on experienced, qualified botanists and zoologists finding the target species concerned.

Victorian Biodiversity Atlas (VBA): This database is administered by DELWP and holds a vast collection of records of flora and fauna species within Victoria. Data for these have been gathered from ecological surveys undertaken by DELWP, museum specimens, professional zoologists and botanists, competent amateur field naturalists and zoological and botanical literature. Records from these databases provide an indication of which species are present in an area and not an estimate of population size. The date of the most recent record of each species considered and the number of records in the VBA are provided in Table 2 and Table 3.

EPBC Act Protected Matters Search Tool: The Department of the Environment administers this online database. Information originates from AVW, VBA and FIS and Bioclim modelling of potential species occurrence.

12. References

Allen GR, Midgley SH & Allen M 2002, *Field Guide to the Freshwater Fishes of Australia*, Western Australian Museum, Perth

Baker-Gabb D 2011, National recovery plan for the Superb Parrot (*Polytelis swainsonii*), Commonwealth of Australia, Canberra.

Cadwallader PL & Backhouse, GN 1983, *A Guide to the Freshwater Fish of Victoria*, Fisheries and Wildlife, Melbourne.

Carter O & Walsh N 2006, National Recovery Plan for the Spiny Rice-flower (*Pimelea spinescens* subspecies *spinescens*), Commonwealth of Australia, Canberra.

Clemann N & Gillespie GR 2004, *Recovery Plan for Litoria raniformis 2004 – 2008*, Commonwealth of Australia, Canberra.

Corli A, Rocchetti G. A., Orsenigo S, Possley J and Abeli, T 2023, *The role of aftercare in plant translocation*, Biodiversity and Conservation, Volume 32, pp. 4181-4197, <https://doi.org/10.1007/s10531-023-02703-x>

Department of Agriculture, Water and the Environment (DAWE) 2020a, *Protected Matters Search Tool*, Commonwealth of Australia, Canberra, accessed 10th April 2020, <<https://www.environment.gov.au/webgis-framework/apps/pmst/pmst.jsf>>

Department of Agriculture, Water and the Environment (DAWE) 2020b, *Species Profile and Threats Database*, Commonwealth of Australia, Canberra, accessed 2020, <<http://www.environment.gov.au/sprat.>>

Department of Agriculture, Water and the Environment (DAWE) 2021, *Species Profile and Threats Database: Dianella amoena – Matted Flax-lily*, Commonwealth of Australia, Canberra. https://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=64886, accessed 6th September 2021.

Department of Climate Change, Energy, the Environment and Water (DCCEEW) 2024, [Survey guidelines for four Grassland Earless Dragons \(*Tympanocryptis* spp.\) of Southeast Australia](https://www.dcceew.gov.au/sites/default/files/documents/survey-guidelines-4-grassland-earless-dragons-tympanocryptis-spp-se-australia.pdf), Commonwealth of Australia, Canberra, <https://www.dcceew.gov.au/sites/default/files/documents/survey-guidelines-4-grassland-earless-dragons-tympanocryptis-spp-se-australia.pdf>

Department of Sustainability and the Environment (DSE) 2010, *Biodiversity Precinct Structure Planning Kit*, Department of the Environment, Land, Water and Planning, East Melbourne.

Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC), 2011b, [Referral guidelines for the striped legless lizard, *Delma impar*](https://www.dcceew.gov.au/sites/default/files/documents/striped-legless-lizard-referral-guidelines.pdf), Commonwealth of Australia, Canberra, <https://www.dcceew.gov.au/sites/default/files/documents/striped-legless-lizard-referral-guidelines.pdf>

Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC) 2011a, Survey Guidelines for Australia's threatened reptiles: Guidelines for detecting reptiles listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999, Commonwealth of Australia, Canberra.

Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC) 2012, *Environment Protection and Biodiversity Conservation Act 1999: Environmental Offsets Policy*, Commonwealth of Australia, Canberra.

Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC) 2013, *EPBC Act Policy Statement: Translocation of Listed Threatened Species - Assessment under Chapter 4 of the EPBC Act*, Commonwealth of Australia, Canberra.

Department of the Environment (DoE) 2016, *National Recovery Plan for the Plains-wanderer (Pedionomus torquatus)*, Commonwealth of Australia, Canberra

Department of the Environment, Land, Water and Planning (DELWP) 2017, *Guidelines for the removal, destruction and lopping of native vegetation*, Department of the Environment, Land, Water and Planning, East Melbourne.

Department of Environment, Land, Water and Planning (DELWP) 2020, *Victorian Biodiversity Atlas 3.2.5*, Department of Environment, Land, Water and Planning, East Melbourne, Victoria, viewed 26th March 2020, < <https://vba.dse.vic.gov.au>>.

Department of the Environment, Water, Heritage and the Arts (DEWHA) 2009, *Significant impact guidelines for the critically endangered golden sun moth (Synemon plana)*, Commonwealth of Australia, Canberra.

Growth Areas Australia (GAA) 2012, *North Growth Corridor Plan*, Victorian Planning Authority, Melbourne.

Higgins PJ & Davies SJJF 1996, *Handbook of Australian, New Zealand and Antarctic Birds, Volume 3: Snipe to Pigeons*, Oxford University Press, Melbourne.

Higgins PJ Peter JM & Cowling SJ 2006, *Handbook of Australian, New Zealand and Antarctic Birds, Volume 7: Boatbills to Starlings*, Oxford University Press, Melbourne.

Higgins PJ 1999, *Handbook of Australian, New Zealand and Antarctic Birds, Volume 4: Parrots to Dollarbird*, Oxford University Press, Melbourne.

Higgins PJ, Peter JM & Steele WK 2001, *Handbook of Australian, New Zealand and Antarctic Birds, Volume 5: Tyrant-flycatchers to Chats*, Oxford University Press, Melbourne.

Jones DL 1994, 'Pterostylis', in Walsh, NG & Entwisle, TJ (eds), *Flora of Victoria, Volume 2: Ferns and Allied Plants, Conifers and Monocotyledons*, Inkata Press, Melbourne, pp. 798-830.

Kennedy SJ & Tzaros CL 2005, 'Foraging ecology of the Swift Parrot Lathamus discolor in the box-ironbark forests and woodlands of Victoria', *Pacific Conservation Biology*, **11**: 158–173.

Marchant S & Higgins PJ 1990, *Handbook of Australian, New Zealand and Antarctic birds, Volume 1: Ratites to Ducks*, Oxford University Press, Melbourne.

Marchant S & Higgins PJ 1993, *Handbook of Australian, New Zealand and Antarctic birds, Volume 2: Raptors to Lapwings*, Oxford University Press, Melbourne.

Menkhorst, P 1995, *Mammals of Victoria*, Oxford University Press, Melbourne.

Nature Advisory 2025, *Salvage & Translocation Plan for Matted Flax-lily Dianella amoena*, Project No. 20045.07 (1.2), Nature Advisory Pty Ltd, Hawthorn East, Report Prepared for Bamford Management Pty Ltd, July 2025.

Nature Advisory 2026 *Offset Management Plan for Matted Flax-lily Dianella amoena*, Project No. 20045.09 (1.0), Nature Advisory Pty Ltd, Hawthorn East, Report Prepared for Bamford Management Pty Ltd, April 2026.

NSW Office of Environment and Heritage (NSW OEH) 2012, *National Recovery Plan for Button Wrinklewort (Rutidosia leptorrhynchoidea)*, Commonwealth of Australia, Canberra.

Richter A, Osborne W, Hnatuik S & Rowell A 2013, 'Moths in fragments: insights into the biology and ecology of the Australian endangered golden sun moth *Synemon plana* (Lepidoptera: Castniidae) in natural temperate and exotic grassland remnants', *Journal of Insect Conservation*, **17**, No. 4.

Robertson, P & Cooper, P 2000, *Recovery Plan for the Grassland Earless Dragon Tympanocryptis pinguicolla*, Unpublished report to Environment Australia, Canberra.

Robertson, P & Coventry JA 2019, *Reptiles of Victoria*, CSIRO Publishing, Melbourne.

Saddler S, Jackson J & Hammer, M 2010, *National recovery plan for the Dwarf Galaxias (Galaxiella pusilla)*, Commonwealth of Australia, Canberra.

Saunders, DL & Tzaros, CL 2011, *National recovery plan for Swift Parrot Lathamus discolor*, Commonwealth of Australia, Canberra.

Silcock J.L., Simmons C.L., Moks L, Dillon R, Reiter N, Jusaitis M, Vesk P.A., Byrne M, Coates D.J. 2019, *Threatened plant translocation in Australia: A review*, Biological Conservation, Volume 236, pp. 211-222, <https://doi.org/10.1016/j.biocon.2019.05.002>

State Wide Integrated Flora and Fauna Teams (SWIFFT) 2019, *Species profile database - Eltham Copper Butterfly*, SWIFFT.

Threatened Species Scientific Committee (TSSC) 2008, *Commonwealth Conservation Advice on Senecio psilocarpus*, Commonwealth of Australia, Canberra.

Threatened Species Scientific Committee (TSSC) 2009, *Commonwealth Listing Advice on Grassy Eucalypt Woodland of the Victorian Volcanic Plain*, Commonwealth of Australia, Canberra.

Tzaros, C 2005, *Wildlife of the Box-Ironbark Country*, CSIRO Publishing, Collingwood.

Weber, JZ & Entwistle, TJ 1994, 'Thelymitra', in Walsh, NG & Entwistle, TJ (eds), *Flora of Victoria. Vol. 2, Ferns and Allied Plants, Conifers and Monocotyledons*, Inkata Press, Melbourne, pp. 840-854.

Webster A 2003, Action statement no. 39, Eltham Copper Butterfly *Paralucia pyrodiscus lucida*, Department of Sustainability and Environment, Melbourne.

Appendix 1: Matted Flax-lily Salvage and Translocation Plan

Appendix 2: Offset Management Plan for Matted Flax Lily *Dianella amoena*