



URBAN GROWTH ADDENDUM

May 2013

Merri Creek and Environs Strategy
2009-2014

Overarching Goals for Merri Catchment

Water goal

Sustainable water use and healthy waterways, wetlands, estuaries, coasts and bays

Land goal

Healthy land used appropriately and productively

Biodiversity goal

Healthy and enduring ecosystems with a diversity of habitats and native species

People goal

The community valuing, understanding and celebrating the region's catchment assets and working to achieve sustainability

Vision for the Merri catchment waterway corridors

To achieve healthy living streams flowing through attractive environments which provide habitat for native animals and are valued by the community as peaceful, passive open space havens. To protect the natural and cultural features of the Merri catchment waterway corridors through sensitive management which will provide a lasting benefit for the community.

COVER PHOTOS:

Upper – Merri Creek, Merriang. The creek is the border of the UGB. To the right (north-west) is designated for a future inter-modal freight terminal, to the left (south-east) is a Green Wedge Zone area that has been identified for future investigation for urban rezoning. ©MCMC

Lower – Construction of a retarding basin on Wallan Creek, Wallan, in the headwaters of the Merri catchment. ©MCMC

Merri Creek and Environs Strategy 2009-2014

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BACKGROUND

The Merri Creek & Environs Strategy and New Urban Growth Areas

The Merri Creek & Environs Strategy ([MCES](#)) provides an overview of important issues along the waterway corridors of the Merri Creek and its tributaries and documents agreed objectives, targets and actions to achieve resolution of the issues. The implementation of the MCES is overseen by a sub-committee of the Merri Creek Management Committee.

In the four years since the Merri Creek & Environs Strategy 2009-2014 was finalised there have been two major expansions of Melbourne's urban growth boundary (UGB) (Fig. 1). This has increased the area of the Merri catchment within the UGB from around 50% to more than 90%.

At the same time, the importance of the Growth Areas Authority ([GAA](#)), a state government statutory body, has grown and the role of local government in planning of growth areas has diminished. The GAA has developed a [Northern Growth Corridor Plan](#). This dedicates large areas of the Merri catchment within the UGB for residential, industrial and business uses. It also delineates landscape and biodiversity areas and other non-urban uses.

Precinct Structure Plan (PSP) areas for most of the growth corridor have been designated. Some PSPs are already finalised, others are being actively developed by the GAA or by Councils with GAA involvement ([PSP Map](#)).

The Need for an Addendum to the MCES on Urban Growth

In late 2012, on the recommendation of the Merri Creek & Environs Strategy Implementation sub-committee, the Merri Creek Management Committee (MCMC) decided to prepare an Urban Growth Addendum to the MCES to ensure the appropriateness and priorities of actions in view of the massive expansion of the UGB in the upper Merri catchment.

This document, the Urban Growth Addendum, has the same chapter headings and numbers as the MCES and consists of introductory text and new actions. The new actions aim to achieve a greater focus on the MCES objectives for key matters in the expanded UGB and identify Merri Creek Management Committee (MCMC) as having the lead role.

The overarching goals and vision (see p.2) are unchanged from the MCES 2009-2014 and the actions in the MCES 2009-2014 on the whole are still relevant. However some of the original actions have been deemed redundant because of the UGB changes and these, plus progress on implementation of MCES actions in general, can be seen by accessing the [MCES actions on MCMC's website](#).

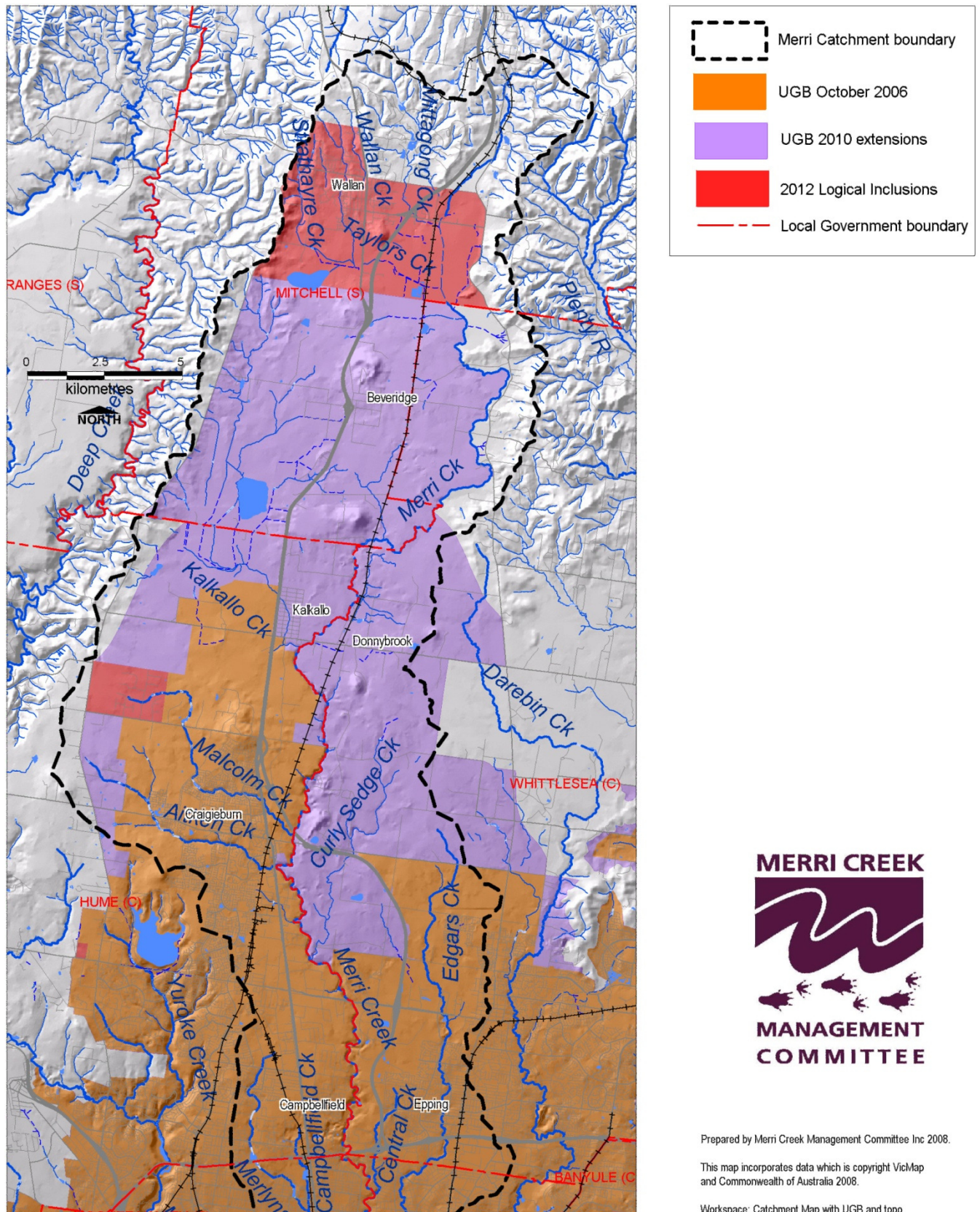


Fig. 1 Middle and upper Merri Creek catchment showing the progressive expansion of Melbourne's urban growth boundary (UGB): 2006 (orange), 2010 (purple), 2012 after 'Logical Inclusions' review (red).

1.1 ABORIGINAL HERITAGE IN GROWTH CORRIDOR

Context

Aboriginal cultural heritage investigations in the growth corridor are undertaken at Precinct Structure Planning (PSP) stage and are largely based on modelling of likely sensitivities of areas for cultural heritage, rather than on new detailed field investigations. This is in accordance with the [PSP heritage guidelines](#) for desktop and 'standard' assessment.

The PSP guidelines further specify that where aboriginal heritage values that have been identified by standard assessment might be harmed by the development of the new urban structure, heritage management options, including incorporation into open space network, are to be investigated. When required, a Cultural Heritage Management Plan (CHMP) has to be produced. Once approved¹, the CHMP would set out how cultural heritage will be managed in the precinct, and no further permits would be required providing contingency measures are met.

The PSP heritage guidelines indicate that the CHMP should be prepared and approved prior to the exhibition and approval of the PSP planning scheme amendment.

Background investigations and aboriginal heritage reports for the Lockerbie, Lockerbie North and [Wollert Precincts](#) identified stony rises as sensitivity areas, in addition to the expected creek-line areas and already registered sites.

Issues

Although heritage investigations will produce new information on aboriginal cultural heritage and new sites will be registered and, where required, CHMPs will be produced in accordance with the Victorian Aboriginal Heritage Act, there is reason to be concerned that sites may be identified too late in the planning process to enable good integration of their protection into other open space and conservation planning. How many sites will be 'protected' by being built over?

There is also little indication that the value of specific sites is being considered within a wider context of valued, though not registered, cultural landscapes.

PSP investigations have identified Stony Rises/Stony Knolls as areas of cultural sensitivity. Unlike waterways, which are usually afforded a measure of protection because of their waterway and biodiversity values, stony rises do not necessarily trigger protection requirements for non-cultural values. For example, numerous stony rises with remnant native vegetation in the Lockerbie and Lockerbie North PSPs have not been protected.

New actions

Action		Priority	Lead
LA24:	Engage with Wurundjeri Tribe Council to clearly and respectfully understand Wurundjeri desires for cultural heritage protection in Merri and, if appropriate, work together to identify ways MCMC can help advocate for Wurundjeri Council's objectives.	High	MCMC
LA25:	Advocate to GAA and growth councils for catchment-wide approach to assessment and protection of Aboriginal cultural heritage, including a focus on stony rises, as early as possible in the planning process.	High	MCMC
LA26	Work with Aboriginal Affairs Victoria to have areas of known or likely archaeological sensitivity on Merri Creek included in their maps of Aboriginal Heritage Sensitivity	High	MCMC
LA27	Advocate for the Growth Areas Authority to commission archaeological surveys of the main waterways within the extended urban growth boundary which have not already been surveyed. Surveys should include mapping areas of sensitivity on:	High	MCMC

¹ CHMPs have to be approved by the [RAP](#) (Registered Aboriginal Party). In the case of the Merri catchment the RAP is the Wurundjeri Tribe Land and Compensation Cultural Heritage Council.

Action		Priority	Lead
	- upper Edgars Creek; - Merri Creek from Hernes Swamp north to the top of the catchment; - tributaries including Aitken, Curly Sedge, Kalkallo, Malcolm, Taylors and Wallan Creeks; and - other sites likely to possess cultural heritage value such as the environs of former swamps.		



Photo: Murnong Yam Daisy *Microseris scapigera* at Kalkallo Common Grassland Reserve. Murnong are culturally important to Wurundjeri Traditional Owners. They were a staple food for Indigenous peoples across the Victorian Volcanic Plain and remnant populations are now quite rare. ©MCMC

1.2 HISTORICAL HERITAGE ISSUES IN GROWTH CORRIDOR

Context

Historical heritage (or post-contact heritage) assessments in the growth corridor are undertaken at Precinct Structure Planning (PSP) stage in accordance with the GAA's [PSP Heritage Management Notes](#).

Heritage Victoria has a role in informing options for protection, conservation and management of post-contact heritage in an urban context and further, in reaching agreement in principle about need to retain or remove post-contact heritage values, and how retained parcels/buildings etc will be managed.

The PSP Notes further state that the finalised PSP heritage plans and any necessary heritage overlays are to be exhibited and approved as part of the PSP.

It's not yet possible to assess the level of protection that will be achieved and the landscape and landuse context in which protection will occur.

Issues

Undertaking PSP by PSP assessments of post-contact heritage values is akin to investigating biodiversity values in small bits, in isolation from the bigger picture. A historical heritage (post-contact heritage) investigation across the growth corridor would provide a more comprehensive understanding of heritage values and a far better context for the PSP based studies.

New actions

Action		Priority	Lead
LH11:	Advocate to the GAA and Hume, Whittlesea and Mitchell Councils to commission a heritage assessment in the Northern Growth Corridor with the aim of better identifying and protecting post-contact heritage in an integrated manner.	High	MCMC



Photo: Dry-stone wall near Spring St, Beveridge
©MCMC

1.3 VISUAL CHARACTER ISSUES IN GROWTH CORRIDOR

Context

The Northern Growth Corridor Plan and the background consultant's report on [open space and visual characteristics](#) deals with the visual values of the Merri Creek catchment in a fairly general way. It has as its key foci the ridge-lines, volcanic cones and waterways. Appreciation of the wider value of volcanic plain landscape and all its elements, i.e. eruption points, stony rises, waterways, swamps, gilgais is absent.

The [Lockerbie PSP](#), the only completed PSP to include direct frontage to Merri Creek, delineates an intense, high density urban interface to Merri Creek. The value of stony rises within the precinct is almost entirely ignored.

Issues

Unless visual characteristics are well documented and advocated for, inappropriate urban development threatens to overwhelm these values.

Opportunities

Most of the precinct planning for Merri Creek frontage areas is not yet completed and for some significant areas, may not commence for some years. Key areas are:

Merri Creek between Craigieburn Bypass and Donnybrook Rd. There is an opportunity to investigate and document landscape values in this reach and to advocate for positive interface to industrial and residential development. *[Includes Craigieburn Employment Area PSPs 25 & 26 for which preliminary planning has commenced].*

Merri Creek in Merriang area Much of this reach of the creek is in a visually 'intact' rural landscape setting (see cover photo). The creek itself is the UGB boundary and to its east is Green Wedge Zone. The area to the west of the creek is designated for a future inter-modal freight terminal, the development of which is some years away. There is an opportunity to investigate and document the landscape values as a basis for further advocacy to protect these values.

Hernes Swamp section of Merri Creek, Wallan This reach of Merri Creek is highly modified as it consists of a constructed earthen channel through the former swamp. It presents an opportunity for reinstatement of swamp/wetland characteristics.

New actions

Action		Priority	Lead
LV19	Advocate to and liaise with Whittlesea Council and GAA to encourage a landscape values study for the Merriang reach of Merri Creek	High	MCMC
LV20	Advocate to and liaise with Hume & Whittlesea Councils and GAA to encourage a landscape values study for Craigieburn Bypass to Donnybrook Rd as part of PSP process	Very High	MCMC
LV21	Advocate to GAA, Melbourne Water and Mitchell Shire for reinstatement/recreation of diverse, natural-looking and ecologically functional waterways to replace drainage channels through drained former swamps such as Hernes Swamp	High	MCMC
LV22	Advocate through growth planning processes for the landscape value of the distinctive volcanic landscape of the Merri catchment and its interrelated components, including eruption points, stony rises, incised creeks with basalt exposures, swamps and promote consideration of this landscape value in an interlinked network of open space across the upper catchment.	High	MCMC

Action		Priority	Lead
LV23	Investigate and advocate with growth Councils and GAA for the commissioning of an independent study by appropriate landscape and geomorphology professionals that identifies, assesses, documents and maps the volcanic landscape values of the upper Merri catchment	Very High	MCMC



Photo: Rural landscape in Kalkallo Creek sub-catchment, Gunns Gully Rd, Beveridge. The Growth Corridor Plan designates this land for industrial use. ©MCMC

2.1 BIODIVERSITY ISSUES IN GROWTH CORRIDOR

Context

The Growth Corridor Plan and the EPBC required [Biodiversity Conservation Strategies](#) have dramatically reduced the ability of local government to implement objectives of the state native vegetation management framework and greatly reduced the scope to implement the [Upper Merri Biodiversity Network Plan](#) produced by MCMC in 2009.

In particular, areas of Native Grassland of the Victorian Volcanic Plain to be retained/conserved within the UGB have already been identified. All other areas of Native Grassland are allowed to be destroyed and offset to the [Western Grassland Reserve](#)s west of Werribee and south-east of Melton a considerable distance from the Merri catchment.

Similarly, areas of Red Gum Woodland to be protected within the UGB have already been identified, the only exception being smaller areas to be defined and protected through the [Wollert PSP](#) process. Offsets are to be achieved in a Grassy Eucalypt Woodland Reserve located outside the UGB close to the Merri catchment. The precise area has not been determined.

Species Conservation Strategies have been prepared for two of the EPBC listed species which occur in the Merri catchment, the Growling Grass Frog and Golden Sun Moth.

New Regional Catchment Strategy (draft) no longer contains the ambitious native vegetation targets of the earlier RCS.

Issues

The key issue is to continue to advocate for the conservation of the catchment's biodiversity and to identify where further opportunities to improve biodiversity outcomes exist.

Biodiversity planning for the most recent additions to the UGB, such as Wallan and environs, is less advanced than for rest of UGB and presents an opportunity to influence how biodiversity matters will be handled.

New actions

GROWTH CORRIDOR PLAN AREA

Action		Priority	Lead
LB20:	Continue strong advocacy and input to PSPs and subsequent planning steps for improved biodiversity outcomes.	Very High	MCMC
LB21	Advocate to Commonwealth Environment Minister to achieve better Biodiversity Conservation Strategy (BCS) <i>(short time frame available for this when final BCS is sent to Minister and available for public comment)</i>	Very High	MCMC
LB22	Advocate for monitoring to be undertaken of effectiveness of EPBC SIA measures in upper Merri	High	MCMC
LB23	Develop biodiversity vision for Merriang/Beveridge freight terminal area <i>(detailed planning for this area appears to be some years away although there has been pressure for part of it to be made available for residential development)</i>	High	MCMC
LB24	Endeavour to document biodiversity values of unprotected sites that might contain as yet unknown Matters of National Environmental Significance.	Very High	MCMC

WALLAN & ENVIRONS

Action		Priority	Lead
LB25:	In collaboration with Mitchell Shire and Wallan Environment Group, identify a network of public open space for biodiversity, recreation and amenity values across the Wallan area recently included in Melbourne's UGB.	High	MCMC
LB26:	Advocate for a strategic approach to Growling Grass Frog (GGF) conservation consistent with and complementary to the EPBC Sub-regional Species Strategy (GGF) produced for the UGB area south of Wallan.	Very High	MCMC
LB27	Encourage Melbourne Water to include review of the former Hernes Swamp in the Office of Living Victoria's Integrated Water Cycle Plan for the North Growth Corridor, and to investigate feasibility of returning at least part the site to a more natural marshy herbfield condition, to protect significant flora and fauna, and to improve the health of Merri Creek.	Very high	MCMC

GENERAL – EXPANDED UGB

Action		Priority	Lead
LB27:	Advocate for the preparation of a biodiversity plan for the upper Merri catchment to inform municipal and other local biodiversity and revegetation plans. Take into account, and draw information from, the Biodiversity Conservation Strategy and existing municipal natural heritage strategies and plans, but also incorporate: a. collection of data for baseline targets, including remnant vegetation and vegetation quality assessment. b. a revegetation strategy, including street and open space planting in new urban precincts), and investigate use of the planning scheme to protect/enhance corridors. c. the use of a focal species approach to guide development of guidelines for design and management of the habitat corridor network.	Very high	MCMC
LB28:	Prepare a policy and guideline statement for the expanded UGB, to guide and help in advocating for effective management of interfaces between land proposed for urban development and conservation areas.	Very High	MCMC
LB29:	Review/update Upper Merri biodiversity habitat network plan in light of expanded UGB and Growth Corridor Plan and advocate for effective habitat links through/across infrastructure.	Very High	MCMC
LB30	Advocate for the timely establishment of the Grassy Woodland Reserve as required under the Strategic Impact Assessment of the urban growth plans.	Very High	MCMC
LB31	<u>Advocate for DSE to continue to monitor rare species populations in the catchment as part of region-wide surveys and existing programs within resources, and check this is being done as part of Strategic Impact Assessment commitments under the EPBC Act.</u>	High	MCMC

2.2 GEODIVERSITY ISSUES IN GROWTH CORRIDOR

Context

The upper Merri catchment contains a number of sites of geological significance. These geodiversity values and sites were not explicitly identified in the Growth Corridor Plan; nevertheless the key sites, eruption points such as Bald Hill and Hayes Hill, are zoned for non-urban purposes. There's very little information on geodiversity values for Wallan and environs.

Issues

Continuing scoria quarrying at Mt Fraser, Beveridge. [Mt Fraser](#) is as a state significant geological site. Many stony rises are not protected and their geodiversity value is not listed.

There is an opportunity for a volcanic plains 'geodiversity' themed park network through the Northern Growth Corridor.

New actions

Action		Priority	Lead
LG8:	Advocate to GAA & Mitchell Shire for a commissioned study to identify geodiversity values in Wallan & Environs.	High	MCMC
LG9:	Advocate to GAA & relevant Councils for identification and protection of geodiversity values through PSP processes	High	MCMC



Photo: Scoria quarry at Mt Fraser, a site of state geological significance. © A. Dawe

2.3 LAND MANAGEMENT ISSUES IN GROWTH CORRIDOR

Context

The change from rural to urban land use is expected to occur over a thirty year time frame and by 2040 at least an additional 260,000 more people will be living in the Northern Growth corridor. In the medium to longer term a much smaller percentage of the catchment will be under rural land-use and these areas will be in much closer proximity to urban areas than they are now.

Issues

In short to medium term the 'rural' areas within UGB will remain rural, depending on how quickly development occurs, and land management of these peri-urban areas will remain important.

Poor land management of rural land 'banked' for urban development will pose a threat to areas designated for conservation. At the same time, sometimes methods adopted to control weeds can be very detrimental to the native vegetation they occur in.

New actions

Action		Priority	Lead
LL16:	Advocate to councils through the PSP process and developers at the development stage to ensure enforcement of pest plant and animal control on private land within the UGB with particular priority being given to land near designated conservation areas and ensuring that control methods are sensitive to native vegetation.	High	MCMC



Photo: Spraying of Needle-grass infestation on private property adjacent to Merri Creek, Merriang
©MCMC

3. WATERWAY ISSUES IN GROWTH CORRIDOR

Context

The recently established [Office of Living Victoria](#) (OLV) is coordinating the development of Integrated Water Cycle Management Plans and Strategies for each of the Growth Corridors. These are a new initiative of the state government which aim to integrate urban and water planning, increase the use of alternative water sources to decrease pressure on drinking water supplies and manage stormwater runoff in ways that improve public health and liveability as well as protecting stream health.

[Best Practice Environmental Guidelines \(BPEM\) for Urban Stormwater](#) treatment is mandatory for new residential subdivisions (as per Clause 56 of State Planning Policy Framework); there is very strong encouragement for same objectives to be met for other urban land uses although this is not yet mandatory.

The BPEM for urban stormwater are being reviewed jointly through a project between Melbourne Water, EPA, OLV & DSE. The impetus for the review is the improved scientific understanding of directly-connected impervious areas and stormwater flows as major determinants of in-stream ecological health. The current guidelines do not address these key parameters and do not stipulate best practice for flow patterns or rate of discharge associated with catchment area.

The GAA's [Integrated Water Management Guidelines for PSPs](#) explicitly state they are seeking beyond 'business as usual' and giving encouragement for greater than standard compliance.

Many pollutants from road runoff are likely to be escaping untreated by standard water sensitive urban design (WSUD) technologies and investigations are underway to consider specific water sensitive road design (WSRD) guidelines to deal with road runoff ([CAPIM 2012](#)).

Melbourne Water has produced Waterway Setback Guidelines for protecting of waterways. These Guidelines specify setbacks for core riparian habitat and adjacent vegetated buffers along different sized waterways.

Issues

Current urban stormwater BPEM requirements are not adequate to stop degradation of Merri Creek and tributaries as the catchment urbanises; water quality and hydrological objectives (reduced 'flashiness') need to be strengthened as foreshadowed in the BPEM review (above).

Good implementation and enforcement of current best practice means is vital; current standards are not necessarily being achieved. This is especially the case during the construction phase of new urban areas when there are very high risks of adverse sediment impacts.

Impacts of urban development on ground-water dependent ecosystems in the catchment need to be assessed and avoided, for example Beveridge Spring, ground-water fed pools of Merri Creek.

Impact of changed hydrological conditions on dependent ecosystems need to be assessed and avoided, for example populations of Murnong and other sensitive species in gilgais (depressions) of the Kalkallo Common grassland.

The impact of potential future discharges to Merri Creek from local Sewage Treatment Plants/water recycling plants has to be evaluated.

Road runoff impacts need to be addressed.

Opportunities

Stabilisation and rehabilitation of waterway form and function, and introduction of greater structural complexity, may be required by Melbourne Water through development approvals.

New stormwater quality treatment wetlands can add to diversity of aquatic systems across landscape and complement existing waterways.

Water quality treatment wetlands proposed for Kalkallo Retarding Basin will partially reinstate the swamp functions of this area.

Harvesting and infiltration of urban stormwater runoff will benefit waterways, groundwater dependent ecosystems as well as providing water supply.

New actions

GENERAL

Action		Priority	Lead
WH4:	Advocate in support of planning reforms to require higher standards of urban stormwater treatment, including flow patterns, and application across all urban land uses.	High	MCMC
WQ13	Advocate to Melbourne Water, GAA and Councils for establishment of wetlands in former swamp areas to achieve better stream health and wetland biodiversity.	Very High	MCMC
WQ14	Advocate in support of research and specific Water Sensitive Road Design guidelines to address road runoff pollution.	High	MCMC
WF9	Advocate to ensure that appropriate hydrological and groundwater conditions are maintained for dependent ecosystems.	High	MCMC

WALLAN

WF9:	Advocate to Melbourne Water for establishment of regional stormwater wetlands in part/s of former Hernes Swamp, Wallan (see also Action LB 27, p.11)	Very High	MCMC
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Photo: Sediment pond of stormwater treatment wetland on Skeleton Creek, Seabrook, in Melbourne's western suburbs ©MCMC

4. COMMUNITY ISSUES IN GROWTH CORRIDOR

Context

The Northern Growth Corridor Plan (GCP) includes information from a background consultant's report on [open space and visual characteristics](#). The report identifies a recreational trail network and open space system. The GCP also identifies areas of biodiversity value which are intended to be protected in the longer term although the mechanism for this protection is not identified.

Issues

The Growth Corridor Plan does not have a clear vision or plan for an integrated Merri Creek Park.

There is no identification of a connected park through to Wallan, but it is important to ensure connected, consistent vision throughout the extended UGB area.

There is potential for recreation to clash with conservation and open space planning along Merri Creek needs to take into account space for a future path as well as sufficient width for biodiversity protection.

New actions

Action		Priority	Lead
CR12/CT17	Advocate for proactive planning for linear parkland and a shared path along entire length of Merri Creek (at least in UGB), including in Wallan.	High	(MCMC)

5. PLANNING ISSUES IN THE GROWTH CORRIDOR

Context

A considerable amount of growth planning has been undertaken for the Northern Growth Corridor although the areas most recently added to the UGB, the biggest of which is Wallan, are not yet included in Growth Corridor Plan (GCP). Various strategies associated with the GCP for biodiversity and integrated water cycle management have not been finalised. In the Merri catchment three Precinct Structure Plans were finalised in 2012, three were in preparation during 2013, and another eight are to come. In addition, it's expected that a number of PSP areas will be designated for the recent additions to UGB including Wallan & environs.

The Victorian Planning Zones Reform review has foreshadowed a weakening of Rural Conservation Zone and Green Wedge controls which could influence landuses adjacent to designated urban areas.

Issues

The planning scheme amendment which implemented the Lockerbie PSP removed the Merri Creek ESO along the PSP reach of Merri Creek. The key form of protection for the creek, in the interim, is the Rural Conservation Zone (RCZ), which has strong on-site controls though the outcome of the Planning Zones Reform may weaken this. Unlike the Merri Creek ESO, the RCZ does not provide guidelines for development land immediately adjacent to the proposed conservation area and thus lacks the ability to control interface issues between creek corridor and urban development land. The PSP itself provides objectives for the creek corridor character. However this 'character' includes a high density town centre as a creek corridor interface. The RCZ has an emphasis on biodiversity conservation but misses out on the landscape, amenity and recreation objectives of the Merri Creek ESO. There will presumably be a strong impetus to remove the Merri Creek ESO as other PSPs progress as the attitude of the Department of Planning & Community Development is that an ESO is unnecessary on land which has a conservation or public recreation use zoning).

New actions

Action		Priority	Lead
MP17	Advocate for achievement of MCES objectives for heritage, landscape, biodiversity, geodiversity, waterway health, and recreation values through Growth Corridor Planning processes, including development of Precinct Structure Plans.	High	MCMC
MP18	In conjunction with Councils, review purpose and function of Merri Creek ESO in expanded UGB and value of retaining the ESO through the PSP process. Following this analysis, advocate to GAA/DPCD for retention of ESO or implementation of other planning tools to ensure Merri Creek ESO objectives are retained.	High	MCMC
MP19	Advocate for retention of strong controls for RCZ and GWZ	High	MCMC



Photo: View of upper Merri Catchment looking south from Pretty Sally hill. Mt Fraser is prominent in middle distance with Bald Hill to right, Wallan in middle distance . ©MCMC