



Moreland City Council

Moreland City Council
Municipal Offices
90 Bell Street
COBURG VIC 3058

Postal Address
Locked Bag 10
MORELAND VIC 3058

Telephone: 9240 1111
Facsimile: 9240 1212

RE: Review of the native vegetation clearing regulations submission to Dept. of Environment, Land, Water and Planning

Moreland City Council would like to thank the Department for the opportunity to comment on the 'Review of the Native Vegetation Clearing Regulations' consultation paper and has the following comments.

1. The reliance on the Location map (Section 4.1.1) to determine the category in the assessment pathway will need to be frequently updated in order to maintain a degree of accuracy and confidence for users. The Department will need to provide guidance and an appropriate platform on how users of the current Location map can input accurate data or alert any inconsistencies with current data. In areas where inconsistent and reliable data is unavailable, proactive on-site surveys would improve the accuracy and assist in streamlining the assessment process. This is of particular importance in highly urbanised areas such as Moreland where many remnant areas are often isolated and small. Also many large trees maybe not have been marked through previous mapping exercises. Relevant data captured through Council vegetation surveys can be provided to assist in the accuracy of the Location Map.
2. There needs to be greater importance placed on the 'Avoid and Minimise' aspects of the native vegetation clearing regulations 3 step process. Included in Section 4.6.1 Steps to avoid and minimise impacts states: "An applicant is not required to avoid or minimise impacts from the removal on biodiversity values in the Basic Assessment Pathway". This sentence implies that 'Avoid and Minimise' is not relevant and clearing of vegetation is the next option.
3. Section 5.2.2- Revegetation standards. The review of these standards needs to incorporate understorey vegetation and in particular grassland revegetation.
4. As stated in Section 6.1 (Use of site-based information to supplement mapped information) the use of site based information provided by an accredited site assessor to supplement mapped information requires a level of professional scrutiny of the information supplied.
5. The compliance and enforcement of the Offsetting requirements (Proposed improvements 26 and 28) needs improved resourcing from DELWP as many Councils do not have the skills or resources to undertake environmental compliance.

Moreland Language Link

廣東話	9280 1910	हिंदी	9280 1918
Italiano	9280 1911	普通话	9280 0750
Ελληνικά	9280 1912	ਪੰਜਾਬੀ	9280 0751
عربي	9280 1913		
Türkçe	9280 1914	All other languages	
Tiếng Việt	9280 1915	9280 1919	

6. In situations where native vegetation removal is the only possible outcome, Offsets must be provided within the boundary of the council issuing the permit.

7. The application of the regulations in inner urban Council areas often leads to the incremental loss of small patches of highly important native vegetation and scattered large trees. Whilst there is greater protection of scattered large trees under the revised regulations the incremental loss of small patches of vegetation (through exemptions) will continue. This loss over a period of time has a huge impact on the local biodiversity of urban areas. The regulations need to provide a means to protect these unique localised pockets of vegetation.



Natural Resource Management Officer
Moreland City Council

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