

ONLINE SUBMISSION DETAILS		
Date Received	08/03/2017	
Name	[REDACTED]	
Organisation		
Email	[REDACTED]	
Postcode	3000	
Privacy Options	I am making this submission as an individual. I request my submission be published anonymously including only my postcode	
Privacy Statement Correct?	Yes	
Privacy Collection Notice Read?	Yes	
Submission Type	Individual	
Previous engagement in review?	Info session 2015	
	Workshop 2015/16	
	Targetted consultation	
	SRG	
	Written submission to CP?	Yes
	Other? Describe	
Will changes improve function of regs?		
Reasons	<p>The Assessment Guidelines while comprehensive appear to repeat matters dealt with in the planning controls. It should just include definitions, flow charts for the assessment process, direction on where to obtain offsets (particularly specific offsets) and the process for ground truthing.</p> <p>The site specific process should be available in all cases, given the poor and incorrect information currently available, and not just on the approval of the DELWP Secretary. The use of site specific information will enhance knowledge of vegetation and biodiversity values of an area. It is submitted that requiring the approval of the DELWP Secretary will add delay and possibly cost to the application process whereas if the ability to check habitat importance information without approval was available then an applicant can incorporate a review into an application without delay.</p> <p>The proposed process, including the reintroduction of the need to avoid, will add complexity to the process that currently does not exist at the moment. The key issue with the current process is the poor information, which would be easily resolved if ground/site trothing was available.</p>	
Implementation issue with proposed changes?	Yes	
Reasons	<p>The starting point for the assessment of all applications is the balancing of conflicting objectives to achieve a net community benefit and sustainable development for existing and future residents. The re-introduction of objectives to avoid vegetation removal and to provide a statement explaining why vegetation removal cannot be avoided or minimized is contrary to this requirement. It places vegetation on a higher level than all other aspects of a proposal.</p> <p>In addition as one of many triggers in a multi-faceted application vegetation removal will have a higher profile and may well be fatal to an otherwise meritorious application.</p> <p>It is submitted that the current process is appropriate and ensures that vegetation is treated as one of many issues involved in the review of an application.</p> <p>In addition where a strategic decision has been made to include an area/site in a residential or urban area then clearly a decision has been</p>	

	<p>made that urban development is the outcome and that vegetation retention is secondary.</p> <p>Accordingly it is submitted that the existing controls should be retained with no requirement to seek to avoid vegetation removal particularly in an urban area.</p> <p>In addition the introduction of new provisions should also be considered in light of existing controls in place. These include Significant Landscape, Vegetation Protection and Environmental Significance Overlays. In some cases these overlays duplicate the provisions of Clause 52.17 and in others they create additional permit triggers. It is submitted that to reduce complexity that Clause 52.17 should contain an exemption that removes the need for a permit under the provision where there is a specific local vegetation control and overlay. This will remove duplication and reduce complexity.</p>
<b>Guidelines – guidance or clarification needed?</b>	Yes
<b>Details</b>	<p>A key issue with the current procedure is the incorrect information provided through the NVIM system. Another is that where specific offsets are identified as being required in some instances (particularly where site assessment would show that the habitat for the relevant species does not exist on site) are not available in the market.</p> <p>It is noted that the proposed Guidelines assume that the inability to secure a specific offset reflects on the project rather than the fact that the relevant habitat does not exist on the site or that the species is not actually available as an offset.</p> <p>However Section 6.2 of the Guidelines does provide, subject to DELWP approval, for an alternative arrangement to provide specific offsets. It is submitted that again more information on the availability of species should be provided in the guidelines.</p>
<b>Terms to include in guidelines glossary?</b>	Unsure
<b>Details</b>	
<b>Subscribe to e-newsletter?</b>	Yes. Please send information updates to my email address
<b>Other comments</b>	<p>I support the transition arrangements, which protects existing applications. It is noted that the proposed Clauses 52.17-7 and 52.17-6 differ in wording from that included in the Assessment Guidelines (Section 6.4 refers).</p> <p>It is submitted that Section 6.4 of the Guidelines should be reworded to be consistent with the proposed clause wording.</p>
<b>Written submission provided?</b>	