

POST/EMAIL SUBMISSION DETAILS		
Date Received	08/03/2017	
Name	[REDACTED]	
Organisation	[REDACTED]	
Email	[REDACTED]	
Postcode	3195	
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	Yes
	Written submission to CP?	Yes
	Other? Describe	
Will changes improve function of regs?		
Reasons	Partly; see my submission.	
Implementation issue with proposed changes?	Yes	
Reasons	Possibly: Gippsland Paper Mill request to continue logging native forests; Great Forest National Park proposal for Leadbeater Possum survival into the future; any remnant/significant flora/fauna needing protection.	
Guidelines – guidance or clarification needed?	Yes	
Details	The Flora & Fauna Guarantee Act under review would need to be firmer in protection of native habitat to compensate for still weak native vegetation clearing rules in the Draft Assessment Guidelines.	
Terms to include in guidelines glossary?	Unsure	
Details		
Subscribe to e-newsletter?	Yes. Please send information updates to my email address	
Other comments	Mandatory flora/fauna field assessments in appropriate season/s, as well as desktop assessments, prior to removal of remnant/significant vegetation.	
Written submission provided?	Yes – attached	

email

8 March 2017

Review of Native Vegetation Clearing Regulations nativevegetation.review@delwp.vic.gov.au
Land, Fire and Environment | Department of Environment, Land, Water & Planning
Level 2, 8 Nicholson Street, East Melbourne, VIC 3002

Dear LFE at DELWP

**SUBMISSION ON 2015 NATIVE VEGETATION PERMITTED CLEARING REGULATIONS REVIEW
2016 DRAFT ASSESSMENT GUIDELINES**

Further to my attending a Stakeholder session, and commenting in August 2015, I now comment on the 2016 Draft Assessment Guidelines.

I am a local conservation volunteer in the City of Kingston where we are fortunate to still have some natural areas along the foreshore and in the Mordialloc Creek Catchment. I also advocate for retaining or improving natural environments locally, state-wide, nationally and internationally.

I am unfamiliar with the native vegetation clearing rules and terminology so I comment as best I can from my experience and accumulated knowledge from colleagues, circulars and the media.

GENERAL COMMENTS

The natural Victorian landscape is unique in the world and occurs nowhere else, yet our native flora and fauna are fast disappearing. This is due to weak regulations; general disrespect for the Victorian natural landscape amongst post-settlement populations who seek familiar introduced plants and animals from their homelands; poor land use or town planning; and rampant development. Victorian native biodiversity and connectivity matters in every landscape—rural or urban—for our flora and fauna to survive into the future, as they should.

During the review period, it has become clear to me that the Native Vegetation Permitted Clearing Regulations have done little to 'sensibly protect sensitive vegetation', particularly small pockets in urban areas or fringes and vegetation in the path of roads or infrastructure everywhere, some of them little gems.

In recent years, native vegetation, some remnant, has been lost in several southern metropolitan locations on public and private land:

- 2013 in Dingley for the Dingley Bypass (Coomoora Woodland, EVC 937 remnant Swampy Woodland, some Snow Gums/White Sallee and associated flora, and aboriginal scar tree lost, some plants rescued, offset plantings, VCAT P1145/2013, KP597/2012)
- 2015 on Kingston foreshore at Mentone, in a poor alignment of a section of the Round-the-Bay Trail plus indented parking (Charman Road to Mentone LSC, EVC 161 Coastal Headland Scrub, VCAT P1624/2014, KP-317/2014). And coastal vegetation is further threatened by a current plan to continue the trail plus parking to Mordialloc;
- 2016 at Braeside for a factory development (40-80 Canterbury Road Braeside, EVC 125 remnant Plains Grassy Wetland, some plants rescued, VCAT P269/2015, KP-112/2015);
- 2016 at Highett for apartment developments (former CSIRO site, EVC 55 Plains Grassy Woodland remnant understorey of Yellow Box and River Red Gum Woodland);
- 2016 on Brighton foreshore for a new pavilion (133 Esplanade Brighton, Ap.No. 5/2016/266/1); and

- 2017 Chelsea is about to lose the last remnant coastal bush to multi-unit dwellings, unless Kingston Council step in to purchase the site (17 Kangaroo Road & 19 Tarella Road Chelsea, complex EVC 3 Damp Sands Herb-rich Woodland and EVC 48 Heathy Woodland, KP-861/2016).

The clearing of these pockets or patches means a loss of biodiversity, habitat and connectivity, for small native fauna and insects for pollination. I am aware that rural Victoria has similarly lost pockets and patches of native vegetation to changed land use or harvesting.

The offset principle, whilst better than none, merely justifies removal of native vegetation in the path of some development, although revegetation of an area due to offset requirements can be valuable. All the same, offsets are a poor substitute for original, emergent, or even planted local native vegetation.

SPECIFIC COMMENTS

The document text needs to be more legible as it is faint and hard to read. Greater use of plain English would assist understanding as the terminology is somewhat hard to interpret or hold-in-mind for a layperson, although the glossary is helpful.

Sadly, the Draft Assessment Guidelines appear to 'sensibly protect sensitive vegetation' only a little better than its predecessor, at least scattered trees are collectively recognised. Should the Draft Assessment Guidelines regrettably remain weak, then the Flora and Fauna Guarantee Act, also weak, must be much more robust in protection of remnant native vegetation.

Otherwise, due to personal circumstances, I have struggled to read and interpret the Draft Assessment Guidelines. In the absence of my specific comments, I fully support the submission by Environmental Justice Australia, for which I apologise to LFE at DELWP and EJA for piggy-backing their submission but it is articulated far better than I am presently able to.

What benefit is 'progress' if our natural landscapes disappear? My sincere wish is for Victorian bureaucrats and planners to find a way to 'plan with nature' by appropriately siting *necessary* development and infrastructure to retain as much as possible of our unique natural landscapes, large or small, into the future, and for regulations to assist that.

Thank you for the opportunity to comment on the Draft Assessment Guidelines. I hope my brief comments are useful.

Yours faithfully

