

ONLINE SUBMISSION DETAILS		
Date Received	06/03/2017	
Name	██████████	
Organisation	Friends of Royal Park	
Email	████████████████████	
Postcode	3052	
Privacy Options	I am making this submission on behalf of an organisation, and understand that it may be published and will include the name of the organisation unless otherwise requested	
Privacy Statement Correct?	Yes	
Privacy Collection Notice Read?	Yes	
Submission Type	Environmental/Community Group	
Previous engagement in review?	Info session 2015	Yes
	Workshop 2015/16	
	Targetted consultation	
	SRG	
	Written submission to CP?	
	Other? Describe	
Will changes improve function of regs?		
Reasons	Not until there is clarification or change of certain definitions and guidelines	
Implementation issue with proposed changes?	Unsure	
Reasons		
Guidelines – guidance or clarification needed?	Yes	
Details	<ul style="list-style-type: none"> <li>- "large" trees - how will trees such as Snow Gums be properly assessed and protected? Old Snow Gums often have multiple stems and may be low/spreading, therefore may not meet the DBH definitions; they also can regenerate after fire - how will such old (mature) regenerating trees be protected?</li> <li>- Also "large" trees are referred to by DBH above and below 1.3m, but shouldn't canopy spread be another measure? It is not simply a measure of 10m or 15m. How do you differentiate between trees with spreading canopies and those more cypress-pine like canopies?</li> <li>- 52.16 Pest animal burrows, obviously caters for rabbits, but what about other pest animal resting places, e.g. foxes' dens, rats' nests, wasp nests, rock shelters, logs that pest animals may rest/hide in and the surrounding native vegetation a factor??</li> <li>- 52.16 The exemption does not apply ... with public funds. This is very short sighted as many plantings on public lands have benefitted from private funding as well. Must allow for privately funded projects as well as public. The Hindmarsh project is a good example, with ongoing, significant financial support from private individuals and organisations.</li> <li>52.17 Grasses. "Native grasses mowed or slashed for maintenance only ... provided that: add dot point: where feasible, mown or slashed after seed maturation and/or dispersal.</li> <li>This is critical if habitat and biodiversity are to be supported. Grasses provide food source through seeds and often are propagated by their seed production/ dispersal. Therefore should aim to enhance their habitat/biodiversity value by including appropriate mowing/slashing</li> </ul>	

	<p>regimens in the Vegetation Clearance guidelines.</p> <ul style="list-style-type: none"> <li>- Draft Assessment Guidelines - 'understorey' usually refers to lower shrubs rather than ground covers and grasses; therefore consider amending definition?</li> </ul>
<b>Terms to include in guidelines glossary?</b>	
<b>Details</b>	
<b>Subscribe to e-newsletter?</b>	
<b>Other comments</b>	<ul style="list-style-type: none"> <li>- A critical issue that needs changing is the Offset guideline where an offset can be "within Catchment Management Area or municipal district." I cite the problem with this for Royal Park's (Parkville) remnant native vegetation site. When the East West Link was being proposed, the majority of this remnant native vegetation would have been removed ... with an offset provided anywhere in the PPWPCMA district. Thus any offset could have been 80km away at Hastings! Surely this provision makes a mockery of the offset as would have applied to Royal Park's EVC remnant vegetation ... and it is still in the new guidelines! Obviously, urban and country areas will be differently impacted by this guideline and a 'one size fits all' is not appropriate.</li> <li>- The use of the guidelines in regard to habitat for 'endangered' or 'rare' species is too narrow. How will 'regionally significant' populations of animal species be protected, if their surrounding vegetation doesn't meet all the native vegetation guidelines? Perhaps a list of all Victorian 'endangered' and 'rare' species and their locations/areas would show how much other significant species will NOT be protected ... a big potential loss of biodiversity for the State.</li> </ul>