

POST/EMAIL SUBMISSION DETAILS		
Date Received	24/02/2017	
Name	[REDACTED]	
Organisation	Knox City Council	
Email	[REDACTED]	
Postcode	3152	
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	Local Government	
Previous engagement in review?	Info session 2015	
	Workshop 2015/16	Yes
	Targetted consultation	Yes
	SRG	
	Written submission to CP?	
	Other? Describe	Yes. Local Government Planning Network made a submission to the Consultation Paper. Knox is part of this group.
Will changes improve function of regs?	See attached sheet	
Reasons		
Implementation issue with proposed changes?	Yes	
Reasons	See attached sheet	
Guidelines – guidance or clarification needed?	Yes	
Details	See attached sheet	
Terms to include in guidelines glossary?	Yes	
Details	See attached sheet	
Subscribe to e-newsletter?	Yes. Please send information updates to my email address	
Other comments	<p>Knox City Council officers are part of the Local Government Biodiversity Planning Network and understand a submission under this network group will be lodged too.</p> <p>For monitoring it is understood that information will need to be obtained from local government annually (i.e. planning permit data). Clear requirements and sufficient lead time should be given to local government to support such action.</p>	
Written submission provided?	Yes – attached	

3. The draft Assessment guidelines and the proposed changes to the VPP have been developed to improve the way the regulations work. Do you think the proposed changes will help achieve this?

Please describe your reasons:

General

The proposed native vegetation changes to the VPP and the draft Assessment guidelines are welcomed and are considered an improvement over the current provisions.

Elements particularly supported include:

greater emphasis on 3 step approach (avoid - minimise - offset), with greater focus on avoiding removal as the first step.

- additional biodiversity values included as important, in particular large trees and endangered Ecological Vegetation Classes.
- site characteristics being able to be used to supplement mapped information for native vegetation condition and species habitat.
- the 'other values' associated with native vegetation to be given consideration under Clause 52.17.
- clearing thresholds for Basic and Intermediate assessment pathways reduced from 1 to 0.5hectares.
- the greater emphasis given to compliance.

Clause 12.01-1 - Additional change recommended

To support long term resilience of Victoria's biodiversity it is considered that there would be merit in adding the following additional dot point under proposed Clause 12.01-1:

Ensure strategic planning:

- "Assists in identifying opportunities to strengthen Victoria's biodiversity and ecosystems to adapt to a changing environment through identification, protection and management of areas of high local biodiversity and ecosystems."

This new component would give the necessary hook for the development of local biodiversity policy, acknowledging the accumulative effect on the state's broader biodiversity objectives of local biodiversity actions.

Strengthening local biodiversity and ecosystems and supporting the local variations that exist can only assist in supporting long term resilience of Victoria's biodiversity and systems to adapt to a changing environment.

Clause 52.17

Suggest deleting word "deliberately" from following exemption under dead vegetation: "Native vegetation which has been ~~deliberately~~ destroyed as a result of unlawful activity".

To prove intent should not be necessary, nor would it be easy to do.

4. Are you aware of any issue that may impact on implementation of the proposed changes?

Yes No Unsure If yes, please provide details here:

Ongoing actions – timeframe for development and implementation

A number of ongoing actions are highlighted within the reform documentation. It will be very important that the support actions outside of the VPP are followed through. This includes: accreditation program available for assessors, training for Council officers, guidance materials for applicants, assessment handbook, exemption guidelines. These ongoing actions need documented timeframes for development and implementation, including appropriate input by local government in their development.

In developing the exemption guidelines for example, it is imperative that adequate review of the drafted document is provided to local government to ensure the guidelines document is clear to understand and does not inadvertently and inappropriately change what is permitted under the exemptions.

Other values

It is noted that all assessment pathways must consider the impacts of native vegetation removal on "other values" and that this is to be considered as per the Assessment Guidelines. The Guidelines identify land and water protection, Aboriginal culture and identified landscape values as 'other values' under Section 1.3.2 and Table 1. It is understood however that 'other values' is not meant to be limited to these specific values but to cover a broader range of values

providing they are known values identified through such means as the local section of a planning scheme i.e. MSS, local policy, overlays.

This broader approach to what constitutes 'other values' is supported. Accordingly, it is recommended that Section 1.3.2 and Table 1 of the Assessment Guidelines be revised to make clearer the broader range of values 'other than those specific ones detailed, while Table 4: *Application requirements for all applications for a permit to remove native vegetation* Application Requirement No 4 should also be amended to include the following additional statements:

- A description of 'other values' that the native vegetation has been assessed against and an assessment of the contribution the native vegetation makes to the stated 'other values'.
- A description of how the design and location of the proposed use or development has minimised impacts on the stated 'other values'.
- A description of how the proposed use and development will be managed to minimise any offset impacts on 'other values'.

Section 4.5.1 should include the following additional dash point under "Impacts on other values of the native vegetation to be removed, including:"

- The role of the native vegetation in supporting other known values as identified in the local section of the relevant planning scheme.

5. Are there any other areas that need further guidance or clarification in addition to those outlined in the draft Assessment guidelines?

Yes No Unsure

Until we have access to the draft Assessment Handbook and guidance materials for applicants it is unclear whether further guidance or clarification is required. Accordingly, it is necessary that further opportunity be provided to local government to submit on this when this draft of the further material is available.

Tree Protection Zone (TPZ)

This should be clearly covered in the Handbook, including diagrams.

6. Are there any other words or terms used in the Assessment guidelines that should be included in the glossary?

Yes If yes, please provide details here:

The Glossary descriptions given for both 'Biodiversity value of native vegetation' and 'Other values of native vegetation' could be improved for clarity. In particular, it is unclear why they cross reference each other, while the terms 'strategic landscape value' in *Biodiversity value of native vegetation* and 'identified landscape values' in *Other values of native vegetation* are not explained.

'Habitat for dispersed species' should be covered in glossary.

7. When there is new information to share about the changes to the regulations, we produce and send out an e-newsletter. Would you like to be on the mailing list?

Yes. Please send information updates to my email address

What other comments would you like to make?

Please provide any other comments relating to the documents released for public comment here:

Knox City Council officers are part of the Local Government Biodiversity Planning Network and understand a submission under this network group will be lodged too.

For monitoring it is understood that information will need to be obtained from local government annually (i.e. planning permit data). Clear requirements and sufficient lead time should be given to local government to support such action.