



## Victorian National Parks Association

60 Leicester Street  
Carlton Vic 3053  
Telephone 03 9347 5188  
Facsimile 03 9347 5199  
vnpa@vnpa.org.au  
www.vnpa.org.au  
ABN 34 217 717 593

West Wimmera Shire Council  
Attention: Manager, Statutory Planning  
PO Box 201  
Edenhope, 3318

Email: [council@westwimmera.vic.gov.au](mailto:council@westwimmera.vic.gov.au)

September 8, 2010

Dear Sir/Madam,

**Re: objection to Planning Permit Application P962 (Part 1)**

The VNPA objects to the granting of a permit for Planning Permit Application P962 (Part 1) for vegetation removal to facilitate better cropping and advertised to be for the removal of 2200 Red Gums. The address of the property is advertised as CA13 Parish of Goroke, 6A, 6B Parish of Koonik, CA 3, 4, 5 6, 9, 10 38-49, 5A, 50B 51, 51A, 51B, 51C, 52A, 53-55, 55A 56-61, 63-68, 70A, Parish Morat located at 5100 Natimuk-Frances Road, Peronne.

The VNPA is a non-government, membership-based organization, whose primary purpose is caring for nature, including the conservation of remnant vegetation and threatened species and communities.

The VNPA objects to this application for the following reasons:

1. Most of the trees to be removed are not Red Gum but large and very large old Grey Box and Yellow Box trees, remnant from the Ecological Vegetation Class 803 Plains Woodland, endangered in the Wimmera Bioregion and listed under the Commonwealth EPBC Act as Grey Box Woodland. They are located just south, but not abutting the Little Desert National Park, a critical nature conservation reserve in that area.

These hundreds of old trees provide important habitat for a range of woodland birds. Recent studies have shown many woodland bird species are undergoing significant decline in central Victoria; destruction of habitat is a major factor in their decline.

2. The VNPA objects to the continuing broad-scale destruction of remnant vegetation on private land in contravention of the intent of the State clearing controls established in 1989. After more than two decades of the operation of these controls, it should be clear that Victoria expects that agricultural development to increase production should be directed to already cleared land.

3. The trees in question are hundreds of years old and cannot be replaced in the timeframe of this generation, or many to follow. They form a critical habitat for State and Commonwealth-listed endangered species such as the

Red-tailed Black Cockatoo. They form part of an important flight corridor to reserves and remnant vegetation to the south.

4. The applicant has not addressed the "avoid or, at least minimise losses" policy of planning scheme set out in c15.09 Flora and Fauna and c52.17 Native Vegetation. Clearing of 2200 (nearly 40%) of the 5600 old trees in the cropping zone is neither avoiding nor minimising losses. Avoiding clearing trees in the swamps does not count as avoidance.

5. There are no real offsets proposed by the applicant. Those that are proposed are inconsistent with the requirements of Appendix 4 of *Victoria's Native Vegetation Management – a Framework for Action 2002*, which is statutory policy, incorporated in the planning scheme. We note that the proposed 220 very large old trees, the 1540 large old trees and the 440 medium old trees to be cleared from the cropping country are of EVC 803 Plains Woodland, an endangered EVC and are of at least "High" conservation significance. They may be even be of "Very High" conservation significance if any provide best habitat for a threatened species. The proposed Red Gum offsets are from a different habitat type which is of lower conservation significance.

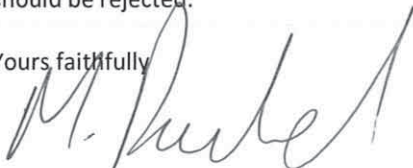
The like-for-like requirements of the Framework are aimed at preventing the clearance of higher significance vegetation being mitigated by offsets in less significant vegetation. They require offsets for high significance vegetation to be from the same vegetation/habitat type or from a very-high conservation significance vegetation type in the same bioregion. The Red Gums proposed as offsets located in swamps on the property are from a different habitat type of a conservation status that is only "vulnerable". Therefore the Red Gums are only of "medium" conservation significance, so do not meet the offset like-for-like criteria. Fencing the swamps on a cropping property are unlikely to achieve any real gains, and more specifically, no gains in the ecosystem of the threatened vegetation being cleared as required by the Framework.

6. The Framework requires the "Net Gain" approach to be applied to clearance decisions. It states that Net Gain includes: "The achievement of gains in extent and quality through its rehabilitation and revegetation with indigenous species for biodiversity and land and water outcomes". It also requires that "permanent losses from clearing are mitigated by gains of an ongoing and secure nature". None of the proposed offsets, even if they did meet the statutory requirements of the Framework, are proposed to be protected in the long term by on-title agreements. Therefore in a few years, applications for their removal could be submitted.

Overall, the VNPA objects because this is a proposal that appears to create a net loss of vegetation over an extensive area and only protecting lower significance vegetation of a different ecosystem that is not under threat.

This proposal stands in stark contrast to Victoria's policy and current directions in protecting vegetation on private land, particularly significant vegetation, significant old trees or vegetation providing habitat for threatened species. This vegetation meets all three criteria. The application for removal of 2200 significant old trees on this property should be rejected.

Yours faithfully



Matt Ruchel  
Executive Director