



Feedback form

Draft guideline: A guide to preparing revegetation plans for clearing permits under Part V of the *Environmental Protection Act 1986*

Respondent information

Company or association represented by this submission

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Why are you/your business or association interested in the draft guideline titled ‘A guide to preparing revegetation plan for clearing permits under Part V of the *Environmental Protection Act 1986*’?

The City of Rockingham is a regulatory authority that assesses developments requiring clearing of native vegetation, some of which require revegetation. The City also undertakes extensive revegetation programs throughout its reserves and foreshore areas.

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Feedback on the draft guideline: A guide to preparing revegetation plans for clearing permits

Are there any parts of the draft guideline where the requirements are not clear? Please outline in the text box below, indicating the page, section number and title for each part being referred to.

The City of Rockingham ('the City') has reviewed the Department of Environment Regulation (DER) draft guideline 'A guide to preparing revegetation plans for clearing permits under Part V of the *Environmental Protection Act 1986*' and has provided comment on the draft guide herein.

The City is supportive of the DER releasing a guide for proponents and regulatory authorities to understand the DER's expectation on the content of revegetation plans prepared as part of the clearing permit process. The guide will allow for higher quality revegetation plans to be prepared and will ensure the plans are being prepared and assessed in a consistent manner. The guide will also assist the City in providing comment on any revegetation plans that accompany proposals to the City.

Section 5- Revegetation Plan, page 4 of the guide refers to a checklist of the DER's minimum requirements of a revegetation plan in Appendix A. It states that the checklist can be modified to meet specific circumstances where necessary, however this is not reaffirmed again in the Appendix. The City recommends that Appendix A be modified to:

- State that the checklist can be modified depending on the specific circumstances/objectives.
- Provide space under each section to allow the proponent to explain why certain information has not been included in the revegetation plan (ie. Why boxes have not been ticked).

Section 5.2.1- Maps and shapefiles, page 5 requests all of the electronic information to be provided to the DER on a CD-ROM, however it would be favourable to allow proponents to email electronic information to be consistent with the requirements for lodging clearing permits.

It would be beneficial to provide an explanation on the difference between minimum completion targets and minimum completion criteria in Section 5.4.1- Developing completion criteria, Table 3 as they appear similar for some of the example criterion.

Please provide other comments or suggestions in the text box below, indicating the page, section number and title for each part being referred to.

Section 5.3.1- Selecting reference sites, page 6 states that an on-site or nearby reference site in a condition of 'Excellent' or better (Keighery, 1994) is required for developing the revegetation plan. The Swan Coastal Plain has been highly fragmented and disturbed; therefore areas of bushland remaining in a condition of 'Excellent' or better can be difficult to locate, particularly on private land. It could be a difficult exercise for a proponent to obtain access to nearby properties in search of vegetation in 'Excellent' condition. In a situation where there are no nearby sites in 'Excellent' condition it would be more beneficial to use a reference site in 'Very Good' condition as it would provide more accurate information on vegetation type and structure based on the local soil type and climate.

It is recommended that the requirement for a reference site be reconsidered to allow proponents to assess the success of the revegetation against vegetation in a condition of 'Very Good' under the Keighery (1994) scale where there are no nearby sites in 'Excellent' condition. In cases where the reference site is in a condition of 'Very Good' or worse, it may be considered appropriate to obtain information on species composition from DPaW NatureMap searches and advice from Local Government Authorities for smaller scale revegetation projects.

The City agrees that pre-vegetation weed control is an important part of successful revegetation. Section 5.5.4- Pre-vegetation establishment weed control, pages 11 and 12 state that a site-specific weed management plan should be developed, however the City is of the opinion that weed management can be covered in the revegetation plan.

The City recommends the guide be updated to recommend a weed survey to be undertaken prior to planning a revegetation program and setting targets for weed cover where a flora and vegetation survey for a site is not current (ie. undertaken over one to two years ago).

The weed species and their dominance can quickly change as the surrounding environment changes. For example a site may have been surrounded by bushland three years ago when the flora and vegetation survey was undertaken, but has since been subject to disturbance from surrounding development which has spread weeds and increased the weed cover.

In the City's experience, the revegetation techniques discussed in Section 5.5 are effective and easily carried out. The City considers the structure of the draft guide easy to follow and understand.

Thank you for allowing the City opportunity to comment on the draft guide to preparing revegetation plans for clearing permits.