



## **The Goulburn Valley Environment Group Inc.**

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Chris Norman  
CEO  
GBCMA

April 28th 2013

Dear Chris

### **Re: Planning Permit Application 2012-336**

The Goulburn Valley Environment Group has recently objected to the removal of native vegetation as part of planning permit 2012-336. We are concerned that current efforts to preserve and improve remnant vegetation in the SIR are being compromised by current water efficiency grants, partly funded by the GBCMA together with the Commonwealth. We also have long-standing concerns, raised with SIRIC, and its sub-committees that Whole Farm Plans are failing to recognise, protect or enhance biodiversity.

We now request that the GB CMA identifies how it intends to deliver on its biodiversity targets for the SIR in terms of improving condition of remnant native vegetation.

This particular permit application is just one example, and we believe there are many others in the irrigation region that are leading to loss of biodiversity. In this case, and a number of others involving whole farm plans with travelling irrigation systems, we consider that there are real flaws in the WFP process, inevitably leading to loss of high conservation value vegetation. These flaws include;

- The first step of the native vegetation framework appears to have been ignored. That first step is to avoid removal of vegetation as part of the development. These are the only large old trees in this paddock.
- The second step of minimising loss of native vegetation also appears to have been rejected by the proponent, and the whole farm plan takes no account of the native vegetation losses.
- There is a mix of large and very old trees and would therefore be home to many thousands of creatures from hundreds of species. With few remaining remnant trees in the vicinity most of these creatures will not survive when the trees are removed.
- These trees belong to an ecological vegetation class that is listed nationally under the Environment Protection and Biodiversity Conservation Act as being under some threat of disappearing altogether. They are large and very large trees which adds to their environmental significance. Local government has the responsibility to ensure that in this region these scattered grey box trees do not disappear.

- Following wide-spread clearing for over 100 years this region has a relatively high watertable. This high watertable mobilises salt which has a significant impact on the long term productive viability of the regions soils. The grey box trees earmarked for removal play an important role in groundwater management at a local scale which contributes to regional watertable management.
- The ongoing loss of isolated paddock trees is of some concern when no one has a handle on how many large and very large trees there are left and what percentage are being removed on an annual basis
- The vegetation proposed for removal includes communities that are listed as endangered ecological vegetation classes in the Goulburn Broken Native Vegetation Management Plan. As such the State Government's Native Vegetation Management Framework states that clearing is 'generally not permitted'
- The vegetation types proposed for removal are critical habitat for a number of threatened species listed on the Flora and Fauna Guarantee Act. (Brush-tailed Phascogaile, Squirrel Glider)

GVEG feels that the current WFP process and water efficiency grants may be contributing to the decline of biodiversity extent and condition in the SIR, contrary to CMA and State Government biodiversity targets and goals.

Consequently, we request that:

- the CMA undertake an audit of WFPS prepared in the irrigation region in the last five years and evaluate (a) their compliance with the planning policy requirements of the Native Vegetation Management Framework and (b) the extent of loss of native vegetation and paddock trees;
- the GBCMA identifies how it will address these on-going losses to high conservation value remnant native vegetation in the region, including what actions may be taken to improve biodiversity outcomes as part of the WFP process.

I am sure you share some of our concerns and would welcome further dialogue with the GBCMA on dealing with these issues.

Yours sincerely  
John Pettigrew

**GVEG President**

***Protecting the environment for generations to come***