

Native Vegetation Newsletter 7

Update on the Native Vegetation Regulations – June 2024



This newsletter contains recent updates from the Native Vegetation Regulation (NVR) team and addresses several commonly submitted queries relating to implementation of the regulations.

Support emails

The Department of Energy, Environment, and Climate Action (DEECA) has recently updated its email addresses to reflect the name change from DELWP to DEECA. Although the previous @delwp email addresses will remain active for a transitional period, we encourage you to use the following new DEECA addresses for NVR-related enquiries:

- Requests to generate a report in EnSym and any queries relating to the EnSym program: EnSymNVRtool.Support@deeca.vic.gov.au
- Queries regarding the NVR, the implementation of the Native Vegetation Guidelines, and the NVR Map removal and offset tools: NativeVegetation.Support@deeca.vic.gov.au
- Queries regarding the assessment, management and establishment of offset sites: NativeVegetation.OffsetManagement@deeca.vic.gov.au
- Queries regarding native vegetation credits, registering an offset site or the Native Vegetation Offset Register: NativeVegetation.OffsetRegister@deeca.vic.gov.au
- Queries regarding payments and invoicing relating to offset sites: NativeVegetation.OffsetPayments@deeca.vic.gov.au
- Queries regarding the Vegetation Quality Assessment (VQA) methodology and competency checks: Habitat.Hectares@deeca.vic.gov.au

Accreditation required- Vegetation Quality Assessments

Any VQA (Habitat Hectare assessment) used for removal or offset site assessments under the *Guidelines for the Removal, Destruction, or Lopping of Native Vegetation* (Native Vegetation Guidelines) must be undertaken by an accredited VQA assessor. This requirement applies to all VQAs, including those for clearing proposals under the Basic or Intermediate Assessment Pathway, as well as for establishing first-party offset sites.

VQA competency checks

The NVR team now delivers in-person accreditation sessions in Anakie (80km west of Melbourne) as well as Warrandyte. Remote re-accreditation sessions are also available for those whose accreditation has not yet lapsed.

The NVR team holds sessions approximately every six weeks. To enrol please email Habitat.Hectares@deeca.vic.gov.au and provide your full name, email address and phone number. You will receive an email back informing you of the available dates and locations. Simply email back to confirm which session you want to attend.

What's new

Revised Applicant's Guide

The NVR team has updated the *Native vegetation removal regulations – Applicant's guide* to provide clearer, more concise information for those preparing an application to remove native vegetation.

This revised guide focuses on proposals under the Basic and Intermediate Assessment Pathways, helping

applicants meet the nine requirements outlined in the [Native Vegetation Guidelines](#).

The guide outlines the purpose of the regulations and highlights key biodiversity values of concern. It defines native vegetation, details the extent of losses to be included in applications, and recommends strategies to avoid and minimise impacts. Additionally, the guide explains the role of vegetation offsets and provides guidance on reducing their costs.

Using this updated guide, applicants can ensure their submissions are thorough and compliant.

NVR Map

[NVR Map](#) was launched on 10th October 2023, replacing the NVIM removal and offset tools. Within the next month, the application is expected to be updated to incorporate the functionality of EnSym.

Following this update, users will be able to generate the following additional reports using uploaded Shapefiles:

- Native Vegetation Removal Reports (NVRs) for proposals within the Detailed Assessment Pathway, or for proposals in the Basic or Intermediate Assessment Pathways where site-assessed condition scores from an accredited site assessor are preferred.
- Native Vegetation Offset Reports (NVRs) for first or third-party offset sites, using site-assessed data from an accredited native vegetation assessor.

There will be no need to submit Shapefiles to the NVR team for processing, except for the following cases:

- NVRs required under the 2013 regulations
- Reports requiring a staged breakdown of offset obligations (e.g. proposals extending across different municipalities)
- Approved Habitat Importance Map (HIM) exclusions and inclusions.

The forthcoming update will also implement several system improvements, including a feature allowing users to generate scenario test reports for proposals in the Detailed Assessment Pathway based on removal features drawn in the map interface or uploaded as a simple Shapefile.

Further information regarding the NVR Map update, including the new data standards and Shapefile templates, will be provided in the coming weeks.

Additional road safety programs under the Road Safety Exemption

The [procedure](#) to rely on the Road Safety Exemption in planning schemes affords special provisions to specific road safety programs that have either been listed in the procedure (e.g. Towards Zero) or subsequently approved for inclusion by the Secretary to DEECA.

In addition to those listed in the procedure, the following road safety programs have been recognised:

- Department of Transport Targeted Road Safety Works Program - Approved 26th October 2020.
- Australian Government Road Safety Program - Approved 25th February 2021.
- Heavy Vehicle Safety and Productivity Program (HVSPP) – Approved 24th May 2023
- 2023-25 Commonwealth Road Safety Program – Approved 18th March 2024
- Safe Local Roads and Streets Program – Approved 9th May 2024.

Cumulative impact criteria for the Road Safety and Railways Exemptions

Road and rail managers must account for past native vegetation removal when submitting endorsement requests for low impact construction works under the Road Safety and Railways Exemptions. Due to the linear nature of these projects and the frequent upgrades along road and rail alignments, considering past removals can often be complex.

To address this, the NVR team has published a [guidance note](#) detailing the requirements for assessing cumulative impacts on species habitat. This document assists authorised road and rail managers by outlining the process for determining whether past activities should be included in current assessments, including specific exclusions and criteria for cumulative impact evaluation.

Supporting road and rail authorities in bushfire risk reduction

The Inspector-General for Emergency Management's Inquiry into the 2019-2020 bushfires highlighted the need for improved awareness among road and rail authorities regarding Clause 52.17 exemptions that facilitate native vegetation removal for bushfire risk reduction.

In response, the NVR team has prepared two guidance notes:

- [Exemptions Enabling Roadside Bushfire Risk Reduction Activities](#)
- [Exemptions Enabling Railside Bushfire Risk Reduction Activities](#)

These documents identify and explain the most suitable exemptions for road and rail operators to undertake bushfire risk reduction activities. They are designed to help road and rail staff, as well as volunteers like heritage and tourist railway operators, navigate regulatory controls related to native vegetation removal for bushfire mitigation.

It is recommended that road and rail managers consult with DEECA or local government authorities to confirm regulatory requirements and the appropriate use of exemptions prior to any works.

Exemptions for Traditional Owners

The NVR team has recently published a [guidance note](#) to assist Traditional Owners in understanding the exemptions under Clauses 52.16 and 52.17 of the Victoria Planning Provisions (VPP) relevant to their land management practices. This includes detailed information on the Conservation Work Exemption, Crown Land Exemption, and Traditional Owners Exemption.

Reporting

The NVR team has recently published the '[Native Vegetation Removal Regulations, 2022-2023 Annual No Net Loss Report](#)'. The report highlights that during the 2022/23 financial year, more native vegetation was permanently protected and managed as offset sites under security agreements than was approved for removal. Key figures include:

- Removals: 228 hectares and 1,559 Large Trees, amounting to 67 General Habitat Units (GHUs) and 49 Species Habitat Units (SHUs), were approved for removal (noting that only 51% of Councils reported).
- Credit Allocations: 920 unique credit allocations were issued for 165 GHUs, 180 SHUs for 41 distinct species, and 2,570 Large Trees. An additional 48 credit allocations were issued under previous regulations.
- Offsets: 940 hectares and 6,057 Large Trees, equating to 197 GHUs and 5,022 SHUs, were protected under new security agreements.

The NVR team is actively engaging with Councils to gather data for the 2023/24 Annual Report, including information on permitted removals, established Section

173 offset sites and compliance action taken to address illegal removal. This data is crucial for evaluating the no net loss objective and all Councils are strongly encouraged to contribute.

VAGO Audit

In May 2022, the Victorian Auditor-General's Office (VAGO) released a report titled '[Offsetting Native Vegetation Loss on Private Land](#)'. The report concluded that Victoria is not achieving its no net biodiversity loss objective for native vegetation clearing with one of the causes being the illegal removal of native vegetation. The report made a series of recommendations and DEECA committed to 18 actions to address these recommendations.

The recommendations included to improve reporting on the no-net-loss objective, update and complete datasets, better manage the offset credit register, investigate options to monitor clearing across the state using spatial imagery, and manage offset sites more effectively. DEECA has completed the 18 actions to meet the VAGO recommendations.

Updated Monitoring, Evaluation and Reporting (MER) Plan

As part of the above noted audit, VAGO recommended that the Department review its Monitoring, Evaluation, and Reporting (MER) Plan to ensure accurate and reliable reporting on outcome, output, and process measures concerning native vegetation loss. The MER Plan, first published in 2019, provides a framework for continually evaluating the no-net-loss objective under the NVR.

In response, the NVR team conducted a thorough review and subsequently updated the [MER Plan](#). The updated plan clearly articulates the evaluation of the no net loss objective, adopting a structured approach with new performance indicators, establishing a revised evaluation and reporting schedule, outlining data gaps and limitations, and identifying future initiatives for improvement.

Policy advice and other information

Vicinity requirements for Large Tree offsets

It has become apparent that the Large Tree offsetting policy may be misunderstood and not applied as intended under the [Native Vegetation Guidelines](#).

Please note the below clarification regarding securing Large Trees within the required Catchment Management Authority (CMA) or Local Government Area (LGA).

Section 5.3.3 (Offset attributes) of the Native Vegetation Guidelines states:

If the secured offset site meets the requirements for the offset amount and general and/or Species Offset attributes, but does not contain the required number of Large Trees, additional general or species habitat units that include Large Trees must be secured. These additional species or general habitat units that contain Large Trees can be located anywhere in Victoria if the General and/or Species Offset amount and attribute requirements have already been met.

DEECA understands that this has previously been interpreted as allowing Large Trees to be purchased from a different CMA/LGA if the general or Species Offset amount and attributes have been met in the required CMA/LGA, regardless of whether Large Trees are available or not within the same CMA/LGA as the required units.

Large Trees secured must meet the attribute requirements for the associated General Offsets and/or Species Offsets, as outlined on page 16 of the Native Vegetation Guidelines. Specifically:

- For General Offsets:
 - The offset must have at least 80% of the Strategic Biodiversity Value (SBV) score of native vegetation to be removed
 - The offset must be in the same CMA/LGA boundary as the native vegetation to be removed.
- For Species Offsets:
 - The offset is mapped habitat according to the HIM for the relevant species.

If there are no Large Trees available within the specified attributes (such as the same CMA/LGA as the removal site or the same SHUs as the removal site) Large Trees may be secured with other attributes. For example, if General Offsets are required and no Large Trees are available within the removal CMA/LGA, they

can be purchased from another CMA/LGA. Some examples are provided below.

Example 1 (General Offsets only)

Offset requirement:

- A General Offset of 0.200 GHUs
 - Located within the North Central CMA boundary or Corangamite Shire Council municipal district
 - With a minimum SBV score of at least 0.500
- The offset secured must provide for the protection of at least 10 Large Trees.

Clarification regarding Large Tree requirements: The 10 Large Trees must be secured within the North Central CMA boundary and/or Corangamite Shire Council municipal district unless unavailable within the CMA or LGA.

Example 2 (Species Offsets only)

Offset requirement:

- A Species Offset of 0.200 SHUs for Greater Glider (*Petauroides volans*)
- The offset secured must provide for the protection of a least 10 Large Trees.

Clarification regarding Large Tree requirements: The 10 Large Trees must be secured as an attribute of associated SHUs for Greater Glider (i.e. within a habitat zone supporting habitat for the species according to the HIM), unless unavailable within any SHUs for Greater Glider.

Example 3 (general and Species Offsets)

Offset requirement:

- A General Offset of 0.200 GHUs
 - Located within the North Central CMA boundary or Corangamite Shire Council municipal district
 - With a minimum SBV score of at least 0.500
- A Species Offset of 0.200 SHUs for Greater Glider
- The offset secured must provide for the protection of a least 10 Large Trees.

Clarification regarding Large Tree requirements: The 10 Large Trees must be secured:

- Within the North Central CMA boundary or Corangamite Shire Council municipal district, and/or

- As an attribute of associated SHUs for Greater Glider (i.e. within a habitat zone supporting habitat for the species according to the HIM).

If Large Trees are unavailable within the CMA/LGA with these attributes the Large Trees may be secured elsewhere in the State.

Accounting for sea grass

The [Native Vegetation Guidelines](#) are incorporated into the VPPs and all planning schemes in Victoria. They are also required to be applied or considered in other approval processes that fall outside of planning schemes e.g. proposals subject to the *Mineral Resources (Sustainable Development) Act 1990*.

The spatial jurisdiction of the Guidelines can include areas of open water that support vascular seagrasses, such as lakes, estuaries and the sea.

It's important for proponents and consultants to note the policy regarding seagrass outlined in Section 3.1.3 (Page 10) of the [Assessor's Handbook](#), which treats seagrass removal similar to the removal of a Patch of native vegetation, employing a standard condition score of 0.800. This policy is particularly relevant for proposals involving activities such as jetty upgrades, which may necessitate seagrass removal in shoreline areas.

VQA methodology

The NVR team would like to confirm that the methodology for completing VQAs remains unchanged, as documented in the [Vegetation Quality Assessment Manual – Guidelines for applying the habitat hectares scoring method, Version 1.3 \(VQA Manual\)](#).

Defining Canopy Trees

A common question submitted to the native vegetation support email account concerns whether a specific tree qualifies as a Canopy Tree within a given Ecological Vegetation Class (EVC).

According to the [Native Vegetation Guidelines](#), a Canopy Tree is defined as:

A mature tree (i.e. it is able to flower) that is greater than 3 metres in height and is normally found in the upper layer of the relevant vegetation type.

The classification of a tree as a Canopy Tree is determined by the EVC benchmark, which specifies whether a species or genus is typically found in the upper layer of that vegetation type. In many instances the EVC benchmark will only list the genus of Canopy Trees (e.g. *Eucalyptus* spp.), in which case any species from the respective genus are considered a Canopy

Tree. A tree cannot be classified as a Canopy Tree unless it is listed as a canopy species/genus in the relevant EVC benchmark.

There is one exception to this rule. When a canopy species from an adjacent EVC encroaches into an EVC that does not have any listed canopy species. For example, if River Red-gums (*Eucalyptus camaldulensis*), which are listed as canopy species in a neighbouring EVC, encroach into a wetland EVC with no canopy species, these trees would be considered canopy species within the wetland EVC.

Ecological Vegetation Class determination

In certain situations, past or present management practices or changes in site conditions may have altered the vegetation structure from its state prior to European colonisation. The [VQA Manual](#) provides guidelines on selecting the appropriate EVC benchmark in these cases. Due to a number of recent requests for clarity in various scenarios, this newsletter provides additional explanations with examples (see Table 1).

When conducting a VQA, the adopted EVC benchmark should reflect the vegetation type most likely present before European colonisation (Table 1, Examples 1-3), unless external factors are the primary influences on the site's vegetation and/or the landowner does not have direct influence or control over the vegetation structure (Table 1, Examples 6 and 7).

If evidence indicates that vegetation structure has changed due to past or current management, the EVC determination must be based on the vegetation most likely present prior to European colonisation (Table 1, Examples 1-3). While DEECA's EVC predictive modelling is helpful, it should only be used as a guide, due to its scale and inherent limitations.

Determining the most likely pre-colonisation EVC involves considering various sources of information. This includes species composition on and near the site, predictive EVC modelling (available on DEECA's NatureKit mapping tool and NVR Map), geology, landscape context, current and historical aerial photographs, and other relevant data (Table 1, Examples 4 and 5). Assessors should justify their EVC determinations based on the available evidence.

In the absence of contradicting evidence, EVC determinations should be based on predictive modelling (Table 1, Example 3).

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Table 1. Examples of potential scenarios of EVC determination in accordance with the VQA Manual

Example	Current vegetation structure	1750 EVC modelling	Vegetation in nearby areas	EVC determination and applicable evidence*	Key considerations in accordance with the VQA manual
1	Grassland	Plains Grassy Woodland (EVC 0055)	The property is relatively small with contiguous remnant woodlands in directly adjacent road reserves in all directions	Plains Grassy Woodland (EVC 0055) Given the site is relatively small and completely surrounded by remnant woodland in all directions, evidence would suggest the site was most likely to have supported Plains Grassy Woodland prior to European colonisation (trees and shrubs likely to have been lost as a result of prolonged grazing pressure and/or land clearing), contrary to predictive EVC modelling.	Evidence suggests there has been a change in vegetation structure due to past or present management. Although the current landowner may not have contributed to these changes, it is probable that previous landowners did. As such, the site should be assessed in accordance with the most likely EVC present prior to European colonisation.
2	Wetland, dominated by Cumbungi (<i>Typha domingensis</i>), within a farm dam	Plains Grassy Woodland (EVC 0055)	All surrounding areas support remnant woodland	Plains Grassy Woodland (EVC 0055) Wetland vegetation within what is clearly an artificial waterbody (farm dam). There is no evidence to suggest there would have been a natural wetland on the site prior to construction of the artificial waterbody.	The Habitat Score for the VQA assessment is likely to be low, which reflects the highly modified nature of the vegetation community. Nevertheless, the site may support high quality habitat for flora and fauna. This may be considered during decision making for avoidance or minimisation of impacts to biodiversity, or, as appropriate, decisions under local planning schemes or other relevant guidelines, policies and legislation.
3	Grassland	Plains Grassy Woodland (EVC 0055)	Grassland	Plains Grassy Woodland (EVC 0055) There is no evidence to suggest that the site, and surrounding areas, were not a former woodland, as suggested by the predictive EVC modelling. The current absence of trees does not, in itself, prove that the site did not once support trees.	Furthermore, the current landowner has the ability to influence the vegetation structure (i.e. rehabilitate the site to its former woodland state by reinstating the natural hydrology and/or revegetation), irrespective of their willingness to do so.

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Example	Current vegetation structure	1750 EVC modelling	Vegetation in nearby areas	EVC determination and applicable evidence*	Key considerations in accordance with the VQA manual
4	Grassland	Plains Grassy Woodland (EVC 0055)	Grassland	Plains Grassland (EVC 0132) Detailed historical surveys from early colonisation map the site as a grassland. Vegetation structure on and nearby the site and historical aerial photography further support this determination.	EVC modelling is a guide only. Evidence suggests that the EVC present is contrary to that predicted by the model.
5	Wetland, dominated by Cumbungi. The site is in what appears to be a natural depression within the landscape.	Plains Grassy Woodland (EVC 0055)	Woodland	Tall Marsh (EVC 0821) The presence of wetland vegetation in what appears to be a natural depression within the landscape contradicts the predictive EVC modelling, indicating that the site likely supported a wetland before European settlement.	There is no evidence to suggest the wetland was created as a result of changed management (e.g. creation of a dam wall). Site assessed vegetation composition and landscape context suggests the pre-European colonisation EVC was likely to be Tall Marsh.
6	Woodland	Plains Sedgy Wetland (EVC 0647)	Agricultural crops, with occasional scattered River Red-gums and Blackwoods (<i>Acacia melanoxylon</i>).	Plains Grassy Woodland (EVC 0055) Another landowner upstream previously diverted a waterway. Consequently, a natural wetland in the subject site dried up and terrestrial vegetation (River Red-gums) established on the former wetland. Evidenced by constructed channels and historical aerial photos.	Site externalities were the major drivers for the change in vegetation structure and composition. The change, and ability to rectify the change, is beyond the control of the landowner (as the changes to hydrology occurred outside their land). As such, the site should be assessed against the EVC benchmark which best fits the current vegetation community , as this now represents the most appropriate pathway for improvement.
7	Saltmarsh	Plains Woodland (EVC 0803)	Samphire shrubland	Samphire Shrubland (EVC 0101) Dead trees throughout the landscape, anecdotal evidence suggests the site historically supported a non-saline woodland, transforming into a treeless halophytic shrubland in recent decades.	Landscape wide changes in salinity levels, largely a result of external drivers, changed the vegetation structure. Landscape wide increased salinisation is beyond the control of the land manager and the site should be assessed against the closest EVC equivalent as this now represents the most appropriate pathway for improvement.

* EVC benchmark used for assessment in accordance with the VQA method, and Application Requirement 10 in Table 5 of the *Guidelines for the Removal, Destruction or Lopping of Native Vegetation* (DELWP 2017, p. 22)

Offset statements

To avoid increased costs, development delays, and the issuing of planning permits with unachievable conditions, applicants, consultants, and regulators must ensure there is sufficient confidence that an appropriate offset is available.

Application Requirement 9 in the [Native Vegetation Guidelines](#) (Page 21) outlines that evidence must be provided that a suitable offset is available. Table 2 in the [Assessor's Handbook](#) provides further information regarding what a suitable offset statement should include.

In reviewing offset statements provided with applications to remove native vegetation, the following key gaps in offset statements are often identified where a new offset site is proposed (first or third party offset site):

- A statement from the landowner of the offset site has not been provided, outlining their understanding of the costs and requirements, and their in-principle willingness to secure the offset site.

In some instances, it has become apparent that the landowner of the offset site has no willingness to secure the offset site, or does not understand the associated costs and implications.

- A letter from a statutory body stating they will sign a security agreement.

For various reasons a statutory body may not be willing to enter into a security agreement.

Failure to provide the above statements:

- Can lead to significant project delays and increased costs whilst a different offset strategy is developed and pursued, or
- Should another offset site be unavailable, lead to planning permits being issued with conditions which cannot be met.

Native vegetation 'Patch' - definition

Under the [Native Vegetation Guidelines](#), a Patch of native vegetation is defined as:

1. An area of vegetation where at least 25% of the total perennial understorey plant cover¹ is native, or
2. Any area with three or more native Canopy Trees² where the drip line of each tree touches the drip line³ of at least one other tree, forming a continuous canopy, or
3. Any mapped wetland included in the Current Wetlands Map, available in DEECA's systems and tools.

During the re-accreditation process of native vegetation assessors in early 2023, it became apparent that 28% of assessor's misunderstood the first of these three definitions. It is a common misconception that there must be 25% cover of native plants to be deemed a Patch of native vegetation.

Less than 25% of the ground may be covered by native plants, but the area still may qualify as a Patch. The '25%' referred to in the definition relates to the **relative cover (proportion) of native cover vs total perennial plant cover**.

Four examples are provided below to demonstrate this concept. In all of these examples the depicted areas qualify as a native vegetation Patch, despite less than 25% cover of native plants being present (Figures 1-4).

1 - Plant cover is the proportion of the ground that is shaded by vegetation foliage when lit from directly above. Areas that include non-vascular vegetation (such as mosses and lichens) but otherwise support no native vascular vegetation are not considered to be a patch for the purposes of the Guidelines. However, when non-vascular vegetation is present with vascular vegetation, it does contribute to cover when determining the percentage of perennial understorey plant cover

2- A native Canopy Tree is a mature tree (i.e. it is able to flower) that is greater than 3 metres in height and is normally found in the upper layer of the relevant vegetation type

3 - The drip line is the outermost boundary of a tree canopy (leaves and/or branches) where the water drips on to the ground.



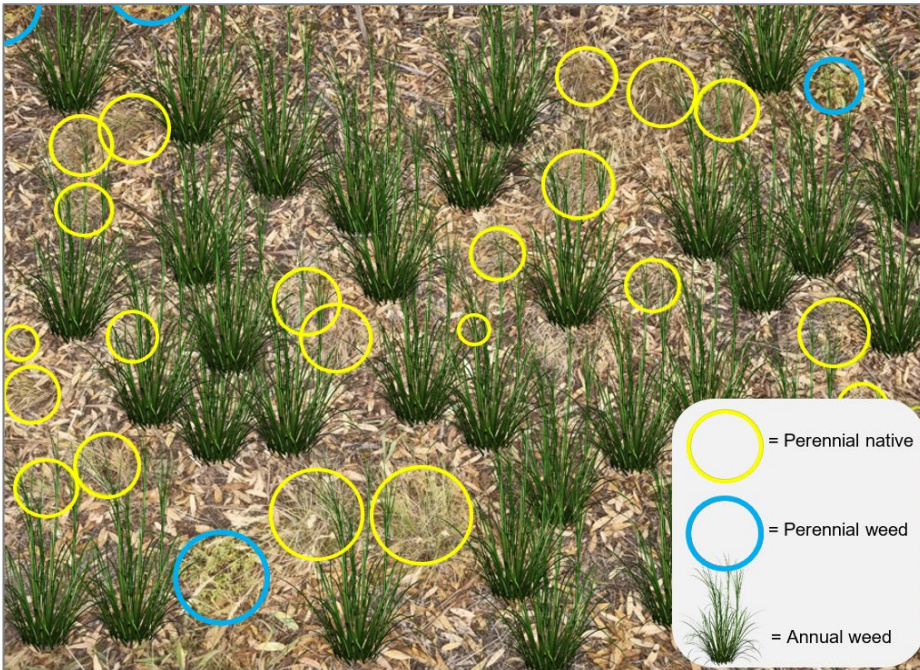
Figure 1: Example Patch with only native plants present

- Estimated 15% cover of perennial natives
- No weeds present
- 100% of the total perennial plant cover is native
- At least 25% of the total perennial understorey plant cover is native (in this case 100%), therefore this area qualifies as a Patch.



Figure 2: Example Patch with native plants and perennial weeds present

- Estimated 15% cover of perennial natives
- Estimated 1% cover of perennial weeds
- Total perennial plant cover = 16% (15+1)
- 93% of the total perennial understorey plant cover is native (15/16=93%)
- At least 25% of the total perennial understorey plant cover is native (in this case 93%), therefore this area qualifies as a Patch.



Same photograph as Figure 2, with annual weeds super-imposed

- Estimated 15% cover of perennial natives
- Estimated 1% cover of perennial weeds
- Estimated 65% cover of annual weeds
- Total perennial plant cover = 16% (15+1=16)
- 93% of the total perennial understorey plant cover is native (15/16=93%)
- At least 25% of the total perennial understorey plant cover is native (in this case 93%), therefore this area qualifies as a Patch
- Annual weeds are disregarded when determining whether an area qualifies as a native vegetation Patch, ensuring consistency regardless of seasonal variations.

Figure 3: Example Patch with native plants, perennial weeds, and annual weeds present



- Estimated 90% cover of perennial natives (comprising 80% cover of mosses and lichens and 10% cover of natives)
- Estimated 5% cover of perennial weeds
- Total perennial plant cover = 95% (90+5=90)
- 95% of the total perennial understorey plant cover is native (90/95=93%)
- At least 25% of the total perennial understorey plant cover¹ is native (in this case 95%), therefore this area qualifies as a Patch

Figure 4: Example Patch with native plants, perennial weeds, and mosses and lichens present

¹ Areas that include non-vascular vegetation (such as mosses and lichens) but otherwise support no native vascular vegetation are not considered to be a Patch for the purposes of the Guidelines. However, when non-vascular vegetation is present with vascular vegetation, it does contribute to cover when determining the percentage of perennial understorey plant cover.