

Native Vegetation Council

Consultation on native vegetation clearance applications

Submission form

You're invited to submit your views on applications to clear native vegetation.

Submissions will assist the Native Vegetation Council to make decisions about the removal and reestablishment of native vegetation in line with the *Native Vegetation Act 1991* and *Native Vegetation Regulations 2017*.

If you have any questions or require assistance completing this form, please contact the Native Vegetation Branch on (08) 8303 9777 or email nvc@sa.gov.au.

Name of clearance application that you are responding to:

James Road / Old Belair Road Intersection Upgrade – described as:

Proposed clearance: 148 scattered trees:

- *Eucalyptus camaldulensis* (River Red Gum): 49
- *Eucalyptus microcarpa* (Grey Box): 70,
- *Acacia pycnantha* (Golden Wattle): 27,
- *Allocasuarina verticillata* (Drooping Sheoak): 2

100m² area of bushland consisting of *Eucalyptus camaldulensis* over *Allocasuarina verticillata* bushland

Your details

Name	Julia Peacock
Organisation	The Nature Conservation Society of SA
Phone number	0400 277 423
Email	Julia.peacock@ncssa.asn.au
Would you like your comments to be anonymous on the public record? All submissions will be provided in full to the Native Vegetation Assessment Panel for consideration. Copies of submissions may also be requested by the applicant and/or members of the public. Please select yes if you would	Yes /No

like your comments to remain anonymous if a request is made.	
Are you happy to be contacted by the Native Vegetation Branch to discuss your submission?	Yes/ No
	Preferred time and method of contact Tuesday to Thursday, phone or email
Would you be interested in presenting your submission to the Native Vegetation Assessment Panel if invited?	Yes/ No
Would you like to be notified of other consultations being run by the Native Vegetation Council? Tick yes to be added to our consultation e-newsletter distribution list.	Yes/ No

Comments in response to application

**Please note: It is not compulsory to answer all of the questions. We recommend that you concentrate on the questions that you can confidently answer and leave the others blank.*

1. Please provide a brief summary of the main reasons you are making a submission.
<p>The NCSSA is concerned that the Data Report does not accurately reflect the true conservation value of the area proposed for clearance, due to a combination of inadequate survey effort and an overly narrow interpretation of the criteria for recognition as an endangered ecological community.</p> <p>Particularly, the NCSSA does not support the conclusion of the Data Report that the area to be cleared does not meet the criteria for recognition as the endangered Grey Box (<i>Eucalyptus microcarpa</i>) Grassy Woodlands and Derived Native Grasslands of South-Eastern Australia as protected under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act 1999).</p> <p>The Data Report states that the patch meets 6 out of 7 criteria but that it is excluded from protection because it does not have at least 10% perennial native grass species in the ground cover.</p> <p>The NCSSA suggests that surveys undertaken on 27-28th September 2020, 6 – 13th July 2021 & 6th September 2021 were likely too early or in the wrong season to identify these grasses.</p> <p>The area is certainly more diverse than the Data Report suggests, with more than 20 species of native grasses and herbaceous plants identified by a short survey</p>

undertaken on 20 January 2022 by an eminent botanist (see Appendix A for list and Appendix B for photos).

This contrasts with the single native grass species identified to species level and single native grass species identified to genus level on page 45 of the Data Report.

The patch is also contiguous with a larger area that is recognised as the threatened ecological community.

Only 10-15% of Grey Box woodland remains compared to its original extent, and therefore the protection of all remnants is essential.

Further clearance will also reduce that value of the remaining vegetation community when compared to leaving it intact due to edge effects such as increased weed invasion.

The NCSSA therefore urges the NVC to exercise its discretion under the Native Vegetation Act, which does not stipulate criteria for listing ecological communities in the way the EPBC Act does, in assessing this clearance application.

The NCSSA understands that this is a Bush for Life site, and that considerable resources have already been spent, including volunteer time, in caring for and recovering it.

Whether or not the area is considered an endangered community is particularly relevant to the assessment against Principle of Clearance 1(d) *the vegetation comprises the whole, or a part, of a plant community that is rare, vulnerable or endangered*; and impacts the Significant Environmental Benefit (SEB) calculation required for the clearance.

The NCSSA questions whether the use of the Scattered Tree Assessment Manual for most of the site, rather than the Bushland Assessment Methodology (BAM), is an appropriate approach.

The NCSSA suggests the NVC should request an assessment of the entire area to be cleared using the BAM, in a manner which reflects the presence of an endangered ecological community, and then compare the SEB requirement.

2. Are there other sites available for carrying out the proposed activity that would result in no or less vegetation clearance and/or impacts on biodiversity? There may be alternative sites on property owned by the applicant, or the applicant could purchase or lease alternative land.

The NCSSA understands that all alternative options for managing traffic on Old Belair Road have not been thoroughly explored.

3. How could the size, design or construction method of the proposed activity be changed to prevent or reduce impacts on biodiversity? This may include removing elements of the development that will have unacceptable impacts.

4. What other actions could be undertaken by the applicant and its contractors during the construction and undertaking of the proposed activity to prevent or reduce impacts on biodiversity?

5. Are there any other measures that could be adopted by the applicant to prevent or reduce clearance of native vegetation and/or impacts on biodiversity?

6. Has the applicant adequately demonstrated how they will undertake the ongoing monitoring and management of issues associated with the proposed activity, such as weed and pest invasion? If not, what other actions should the applicant commit to?

7. Has the applicant adequately demonstrated that they can re-instate vegetation as much as possible through restoration activities once the proposed activity has ceased? If not, what other actions should the applicant commit to?

8. Are there other opportunities for delivering the required Significant Environmental Benefit offset (if applicable) that would produce better environmental outcomes?

The NCSSA questions whether the proposed payment of \$179,738.60 is realistically adequate to cover the full cost of achieving a commensurate 'environmental benefit' in another location.

Further, protecting the existing remnant is far preferable to attempting to 'recreate' it elsewhere. Any existing, remnant plant community with any understorey at all is more valuable than revegetation because:

1. The time element required to arrive at an equivalent,

2. The intact nature of the flora and fauna in the undisturbed soil, and
3. The buffering of the core area of the ecological community.

9. Please provide any additional records or anecdotal evidence on the flora and fauna located in the clearance area that the Native Vegetation Assessment Panel should consider when reviewing the application.

As mentioned earlier, the NCSSA believes a greater diversity of species to be present in the understorey than have been identified in the Data Report. *Themeda triandra*, *Austrostipa tenuifolia* (rated as rare status in SA), and *Austrostipa setacea* have been recorded along Old Belair Road near Randell Reserve (see Herbarium records BS191-1557 – 59). *Lomandra densiflora* and *Stackhousia subterranea* have also been recorded nearby.

More than 20 species of native grasses and herbaceous plants identified by a short survey undertaken on 20 January 2022 by an eminent botanist (see Appendix A for list and Appendix B for photos – an example of the density of wallaby grass identified in that survey below – highlighted by red circles).



The NCSSA notes that moss and “cryptograms” (sic – should be cryptogams) have wrongly been included as weed cover on page 25. These are not weeds so the total sum of % cover should be 16.6% rather than 20.6%.

Further, the statement on page 25 that ‘Other areas surrounding this area were co dominant or dominated by *Eucalyptus leucoxylon* ssp. *leucoxylon* and *Eucalyptus*

camaldulensis and not therefore part of the threatened community' does not appear to be correct since the EPBC Act Guidelines for the Grey Box ecological community state that these two species can be associated, or co-dominant, with Grey Box.

10. If you believe that clearance consent should not be granted, please outline your reasons and provide any additional information available to support your position.

Clearance consent should not be granted until all alternative options for managing traffic have been explored and an assessment that adequately acknowledges the endangered ecological community that is present on the site has been made.

Declaration

<input checked="" type="checkbox"/>	I hereby certify that to the best of my knowledge the information provided in this submission is complete and correct and no information is false or misleading.
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Lodging your form

Send your completed submission to the Native Vegetation Branch via:

Email: nvc@sa.gov.au.

Post: GPO Box 1047 Adelaide SA 5001

Appendix A

Extra species found on 20/01/ 2022 by Ann Prescott within 100 m linear along the proposed roundabout location from WP 1083246 6125234 to about WP 0283225 6125266.

Garmin 12XL - GPS reading Zone 54H GPS Map datum WGS 84 UMT/UPS

Grasses and Grass Relatives

Anthosachne scabra (*Elymus scaber*)

Austrostipa blackii

Austrostipa falcate group

Austrostipa scabra

Austrostipa setacea

Austrostipa species (D)

Austrostipa species (F)

Lomandra densiflora

Poa species

Rytidosperma caespitosum

Rytidosperma setacea

Rytidosperma species

Themeda triandra

Herbaceous

Amyema miquelii

Arthropodium strictum

Atriplex suberecta or *A. semi-baccata*

Crassula colligata (?)

Dianella revoluta

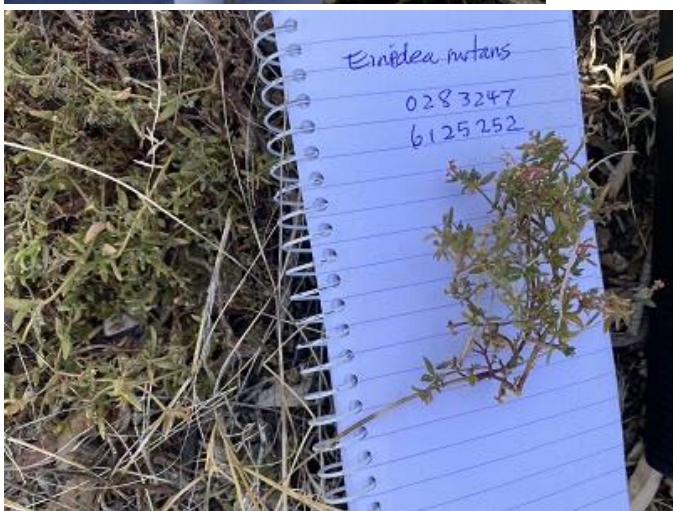
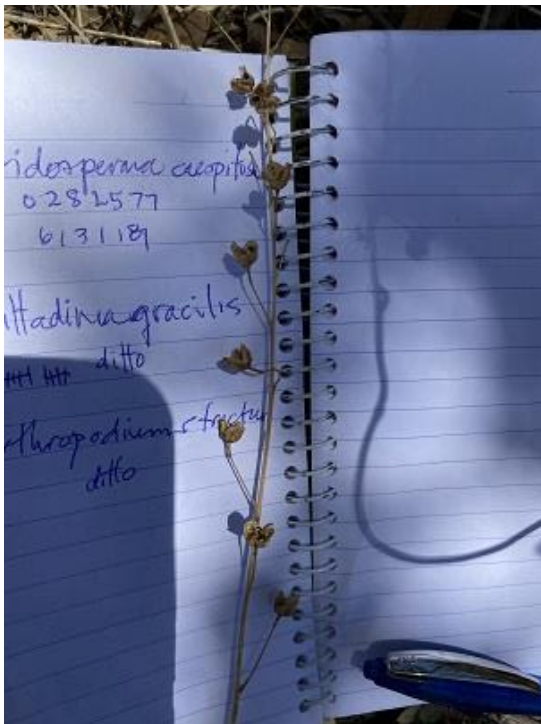
Einadia nutans

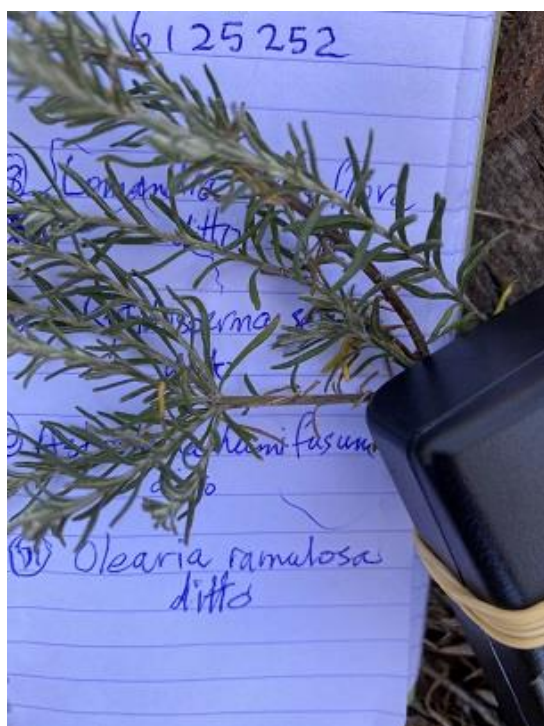
Olearia ramulosa

Styphelia humifusa (*Astroloma humifusum*)

Vittadinia gracilis

Appendix B – photos from survey on 20/1/2022

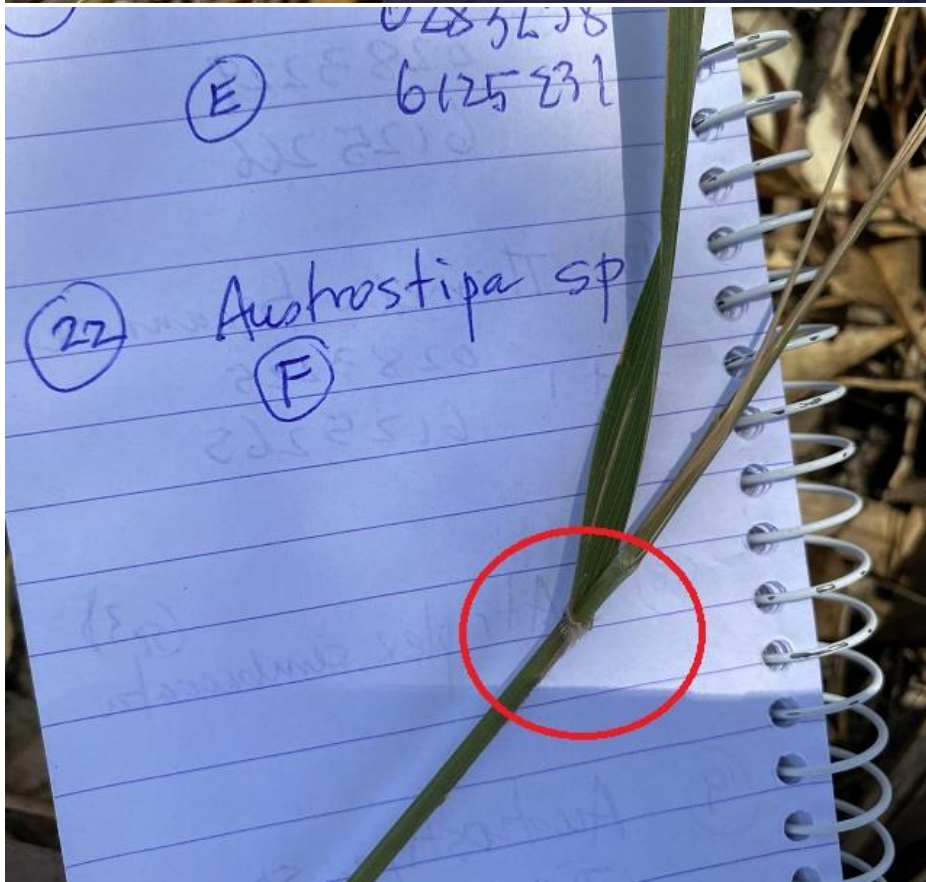
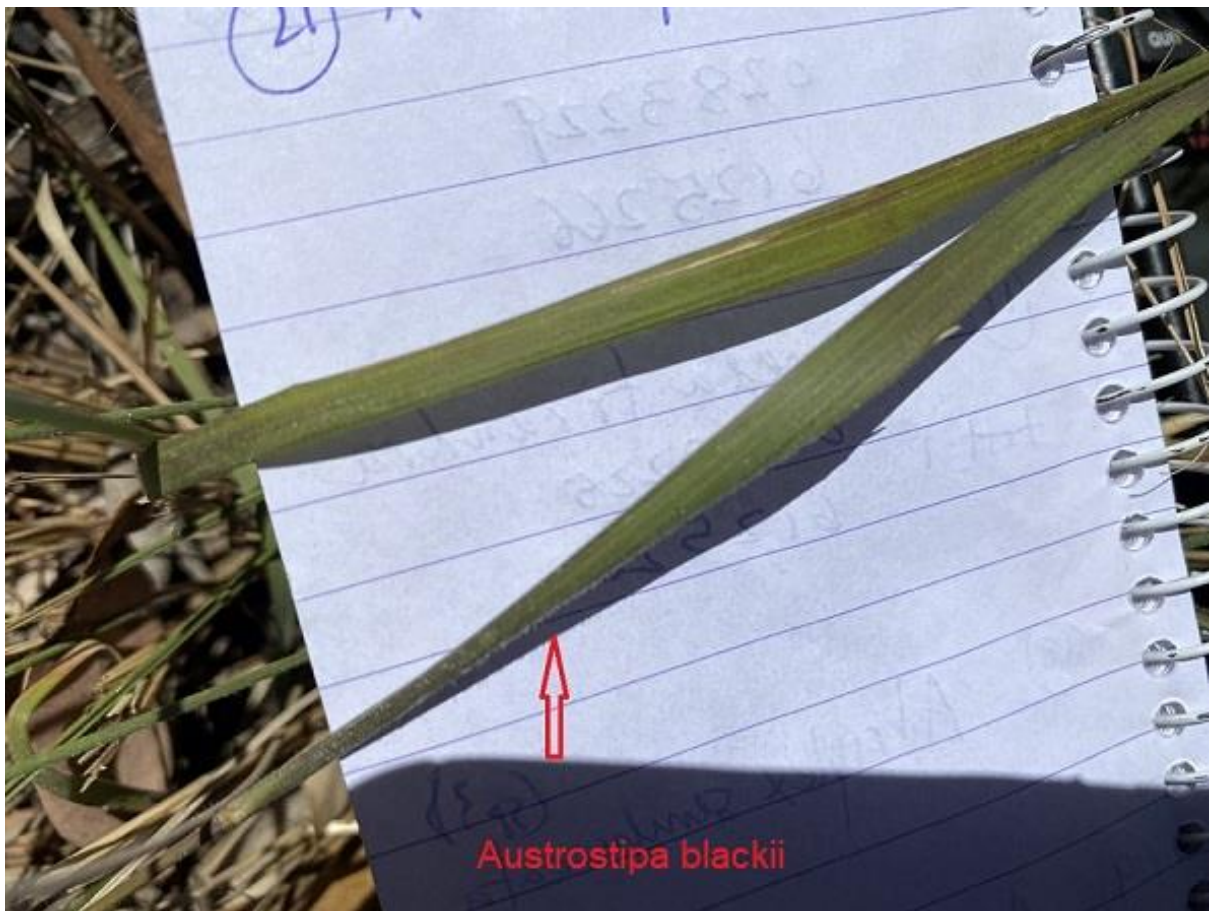


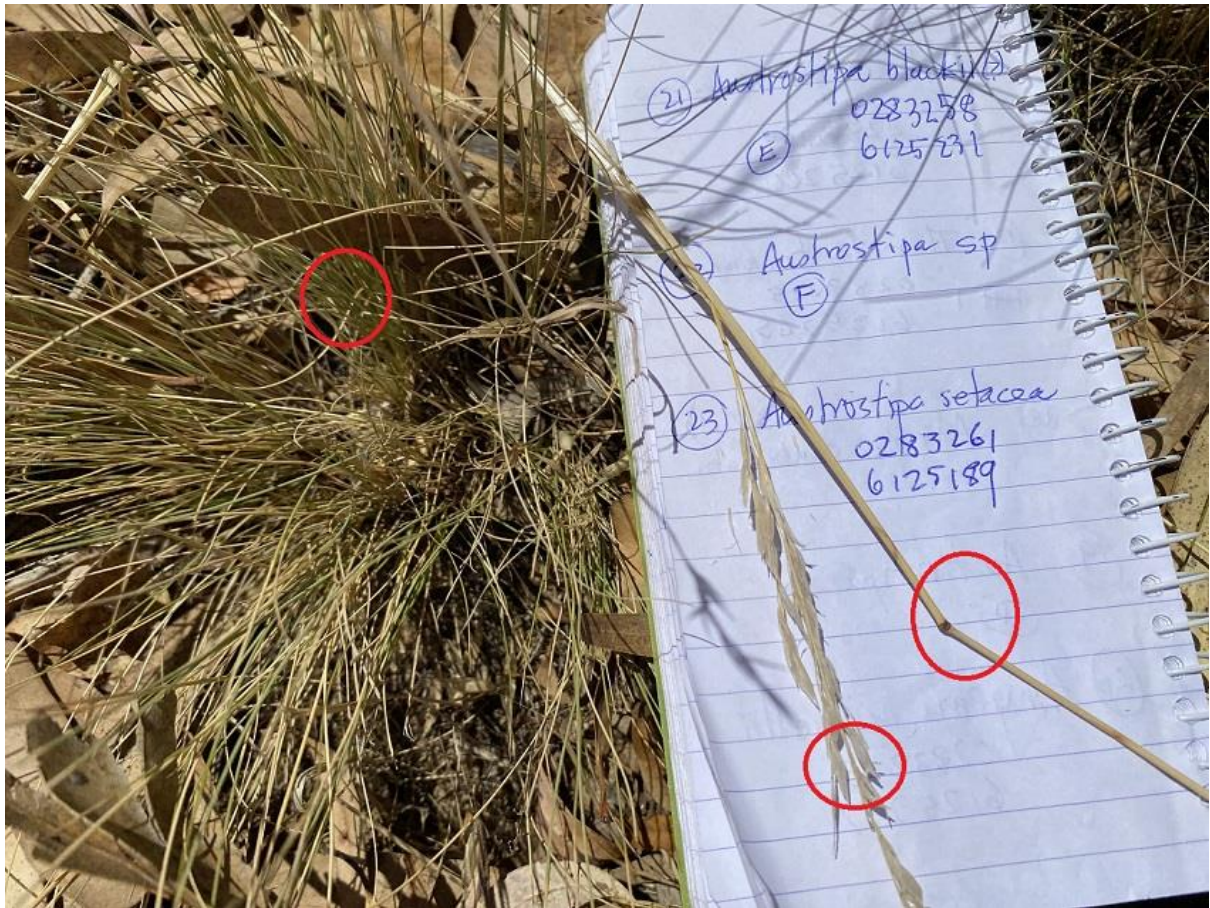












(21) *Austrostipa blackii*
0283258
(E) 6125231

(22) *Austrostipa* sp
(F)

(23) *Austrostipa setacea*
0283261
6125189