

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:

Roxby Downs West Accommodation Village
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Your details

Name	Nicki de Preu
Organisation	Nature Conservation Society of South Australia
Phone number	0447848964
Email	nicki.depreu@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 like your comments to remain anonymous if a request is made.	No
Are you happy to be contacted by the Native Vegetation Branch to discuss your submission?	Yes
	Preferred time and method of contact Daytime – mobile phone

Would you be interested in presenting your submission to the Native Vegetation Assessment Panel if invited?	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 Please note that I believe I am already on the list but, if not, please add.

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 Nature Conservation Society of South Australia (NCSSA) is a community based, not-for-profit organisation that, since 1962, has been a strong advocate for native vegetation and biodiversity conservation in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas.</p> <p>NCSSA acknowledge that a larger Study Area was selected for the ecological assessment to allow flexibility as the design was progressed and that the SEB calculations are based on the maximum area of clearance. We do not support this approach as it means uncertainty about the location and actual area of clearance that is to be considered for approval by the NVC. For example the proponents have suggested two options for the location of the WWTP at OD South and RD West. We contend that the precise locations of the sites for the WWTPs should be determined <u>prior</u> to the project approval.</p> <p>The Data Report acknowledges the limitations of the Desktop study (Page 10) and potential for unreliable conclusions to be drawn for areas that have been underrepresented in terms of biological studies. It also acknowledges the limitations of the Field survey methods for fauna observations that is of concern to NCSSA. We recommend more comprehensive fauna surveys are conducted as part of the assessment process as the outcomes will affect the SEB calculations.</p>

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.
We accept the proposed locations of the RD West and OD South Accommodation Villages and Infrastructure Corridor as appropriate however recommend that the precise locations of the WWTP for RD West and OD South are confirmed prior to the project approval rather than having two alternative locations approved. This would

reduce the potential area of vegetation clearance, SEB calculations and subsequent impacts on biodiversity.

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.

The Data report outlines several ways that the design or construction of the project could be undertaken to reduce impacts on biodiversity (Section 7, Pages 60-61). NCSSA recommend that the NVC support the proposal to retain existing native vegetation where possible, but particularly in areas where Northern Cypress Pine and Bullock Bush are currently regenerating. NCSSA also recommend the NVC require the rehabilitation of pipeline easements and retention of existing dune system to allow for maintenance of natural stormwater flows across the site, as advised in the Data report.

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?

NCSSA recommend that a pre-clearance survey is undertaken by a suitably qualified ecologist to determine the presence of fauna species immediately prior to commencement of vegetation clearance. Where fauna are identified with the inability to independently relocate easily, the impacted individuals should be relocated to suitable habitat nearby under supervision of a suitably qualified ecologist.

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?

See previous comments.

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?

No mention is made of ongoing monitoring or management of pest animals or weeds in the proposed clearance area in the Data report. The Management Plan for the Emerald Springs SEB Offset Areas provides details of ongoing management and monitoring for that area, however given that this plan was submitted 12 months ago, some progress should have been made in terms of removing cattle from the offset area.

We do not consider that the applicant has adequately demonstrated how these matters will be addressed. Further detail is required.

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?

No details are provided of any rehabilitation of vegetation in the RD West footprint should it be approved. Section 7.3 of the Data report advises to avoid clearance of vegetation communities containing Northern Cypress Pine and Bullock Bush and stockpiling of vegetation and topsoil profiles during site clearance activities for later use in rehabilitation works.

NCSSA recommend the NVC support this advice when approving the project. Further information is required to determine whether the applicant can restore/rehabilitate native vegetation and how this will be done.

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

No, we consider the proposed Emerald Springs SEB offset area to be adequate with the additional benefit that it contains a nationally endangered ecological community and provides habitat for a range of nationally and state listed species of conservation significance.

We note that if rare or threatened plants were missed in the assessment of the site, this has implications for the biodiversity score and therefore the calculation of the SEB.

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.

NCSSA suggests that some of the information in Table 5 regarding the Likelihood of occurrence of Threatened and migratory fauna species within the Project Area needs further review. For example, it is quite possible that the WWTPs could provide habitat for migratory waders such as the various species of Sandpiper and waterbirds such as the Blue-billed Duck. The Likelihood of occurrence for these species should be rated as Possible rather than Unlikely.

As stated in the Data report, the seasonal conditions in the lead up to the field survey were not optimal for detection of annual and ephemeral flora species or indeed terrestrial fauna due to extremely low rainfall. The Data report acknowledges the compiled list of fauna observations does not represent all species expected to occur within the Study area. We recommend that the Rangeland Assessment Method is modified to include a more comprehensive survey of fauna if it is to represent the actual ecological value of the area.

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.

NCSSA believe that clearance consent should only be granted for one of the proposed options for the WWTP at RD West and OD South.

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