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:

Springwood Estate – Gawler East - proposed the clearance of 27 scattered trees under Regulation 12(35) Residential Subdivision

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 like your comments to remain anonymous if a request is made.	~~Yes/~~No
Are you happy to be contacted by the Native Vegetation Branch to discuss your submission?	Yes~~/No~~
	Preferred time and method of contact Phone or email, usually Tuesday & Thursday
Would you be interested in presenting your submission to the Native	Yes/~~No~~, if the Panel believed that would

Vegetation Assessment Panel if invited?	be helpful
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.

The NCSSA is making a submission because:

- This housing development should retain large trees already on site, particularly given that increasing green canopy in urban areas has been identified as a priority for Adelaide (https://livingadelaide.sa.gov.au/targets/a_greener_city), and especially in light of a warming climate,
- The Data Report states that there is no remnant understorey, but the NCSSA understands that a number of native groundcover species occur at the site, and
- Some of these trees are very large yet their notable size, and therefore conservation significance, is not adequately captured by an assessment under the Scattered Trees Assessment Manual.

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 is not privy to the background of how the site was selected for this particular housing development, however, the map on page 10 clearly shows that the general area around Gawler has been substantially cleared. This is confirmed by the Data Report, which acknowledges that the Mount Lofty Ranges IBRA Subregion remnancy is just 15%. It therefore should be possible to establish additional housing in the region without removing trees.

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 NCSSA believes these large native trees should be retained in this housing development, due to both their habitat value and also their shading and amenity value. This is particularly important given Adelaide is currently seeking to significantly increase urban canopy cover (https://livingadelaide.sa.gov.au/targets/a_greener_cityhttps://livingadelaide.sa.gov.au/targets/a_greener_city), and it is therefore retrograde to remove trees from new urban areas.

A number of these particular individuals of *Eucalyptus porosa* are very large and therefore of particular conservation significance. The tallest height category in the Scattered Tree Assessment Manual for this species is 6.8m, yet some of these trees are more than twice that tall (for example, 15 or 16m). The NCSSA is concerned that the conservation significance of these very large trees is not adequately captured by an assessment under the Scattered Trees Assessment Manual, as there is no additional category or "weighting" to reflect their very large size.

The NCSSA therefore believes it is imperative that the design of this development be altered to avoid tree clearance. For example, trees that are proposed to be cleared for the roadway could be retained by dividing the road, and others incorporated into planned open space.

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?

The Data Report states that there is no remnant understorey, but the NCSSA understands that a number of native groundcover species occur at the site, including Spear-grass (*Austrostipa* sp.), Wallaby-grass (*Rytidosperma* sp.), New-Holland daisy (*Vittadinia cuneifolia*), Climbing Sundew (*Drosera macrantha*) and Woodland Creamy Candles (*Stackhousia monogyna*).

It is concerning that the presence of these species has not been identified in the Data Report.

A condition of approval, if granted, should be that as many of these plants as possible be translocated to an appropriate location.

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 Data Report states that the preferred SEB is a payment of $102,907.24 into the Native Vegetation Fund. The NCSSA is concerned that there is, as yet, no clear line of sight between any given payment into the Fund and the 'offset' it supposedly generates. More worryingly, there is no robust evidence that such offsetting approaches actually achieve the desired environmental outcome.

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 stated earlier, there are a number of understorey native species present that were not identified in the Data Report, including Spear-grass (*Austrostipa* sp.), Wallaby-grass (*Rytidosperma* sp.), New-Holland daisy (*Vittadinia cuneifolia*), Climbing Sundew (*Drosera macrantha*) and Woodland Creamy Candles (*Stackhousia monogyna*). It is very concerning that the NVC are being asked to make a decision on this clearance without being provided with fulsome and accurate information on the condition of the site.

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.
The NCSSA believes that the developer should be required to avoid clearing these trees, for both their current habitat value as well as future shading for the housing development, and that native ground cover species should be translocated.

Declaration

X	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.

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