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Native Vegetation Branch  
Department for Environment and Water  
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6 December 2018

**RE: Interim guidelines for the management of native vegetation under Native vegetation Regulation 11 (23)**

To the Native Vegetation Council,

The Conservation Council of South Australia (Conservation SA) welcomes the opportunity to make a submission to the NVC.

Conservation SA is an independent, non-profit and strictly non-party political peak body organisation representing around 60 of South Australia's environment and conservation organisations. Conservation SA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia since 1971.

Many of our member groups are currently heavily engaged as key partners in the management of native vegetation on both public and private lands right across the state and in some instance across state borders through healthy landscapes planning.

A range of our member groups will be providing submissions which will explore in more details specific sections of the interim guidelines.

**Overview**

1. The new Guidelines facilitate the removal of a vast number of large and significant trees across the landscape, particularly those occurring on smaller unsealed roads used by local traffic only. The Native Vegetation Council has not quantified the environmental impact of the Guidelines, such as how many large and significant trees would be removed if the Guidelines were fully implemented.
2. The new Guidelines only provide options to remove more native vegetation for safety, despite that for many roads, particularly unsealed roads, more clearance and verge widening may increase the speed of traffic and increase the frequency and speed of collisions.

3. On many unsealed roads, the width of the carriageway, verge, travelled way, primary clearance envelope and secondary envelope is not clear or may vary along many sections of the same road. Therefore, the retention of all large and significant trees and native vegetation along these unsealed roads is up to interpretation. It can be expected that councils may therefore over react to achieve what is "required" under the Guidelines.
4. Only two types of road are identified, being sealed and unsealed. For the sealed roads, there are only two speed ratings >80 km/h and < 80 km/h. These categories are inadequate to appropriately address road safety and environmental assets. There is no recognition of high transit roads being different from rural residential and local traffic roads. In this submission, it is suggested that new categories be added as alternative strategies rather than clearance of large and significant trees and other roadside native vegetation.

These new categories could include:

- Rural residential road at less than 60 km/h
  - Rural residential road at less than 50km/h
  - Biodiversity or wildlife zone road at less than 60 km/h
  - Biodiversity or wildlife zone road at less than 50 km/h
  - Significant tree/Biodiversity asset speed constraint (25km/h - 40 km/h slow down point to pass biodiversity hazard that may be within the primary or secondary clearance envelope.
5. Ongoing issues associated with guard railing and the interaction of Regulation 11 (23) and 12(24) have not been addressed. Without addressing this matter, more large and significant trees are at risk of removal.

#### *Roadside Maintenance Recommendation 1*

- In relation to the Section 1 – Primary Clearance Envelope, Secondary Clearance Envelope and Verge clearance: It is preferable to amend 'clearance is required' to read 'clearance is permitted if no other options are available'.

#### *Roadside Maintenance Recommendation 2*

- Alternative speed categories should be established as alternative options for rural residential roads, biodiversity/wildlife zones and passing point environmental assets. As alternative solutions are not identified or described the only response to any safety matter in this Guideline is to remove native vegetation.

It is our view that the guidelines may not result in outcomes consistent with the maintenance and operating principles unless there is a stronger process of assurance monitoring, evaluation and review.

Therefore we recommend more funds be made available and allocated for compliance and compliance related actions both within the Department and Landscape Boards.

We are keen for further explanation as to how these new guidelines will provide net benefit to native vegetation protection.

Thank you for the opportunity to provide a submission into this important review.

Please do not hesitate to contact me on [craig.wilkins@conservationsa.org.au](mailto:craig.wilkins@conservationsa.org.au) or (08) 8223 5155 should you require any further information.

Yours sincerely,



Craig Wilkins

Chief Executive