

Community Submissions  
Draft Roadside Conservation Management Plan



Date Received	Theme	Summary of Points	Council Response
17/01/2022	Fire Management / Roadside Conservation	Was unable to find a copy of Councils Fire Management Plan on our website that is cross referenced in section 7.6 Fire Management. Would also like to see more education and awareness on not collecting firewood on high conservation roadsides and consider putting signs up at high conservation roadsides advising of their significance.	Plan is not currently available, new plan being developed which will then be on the emcop link. Link will be updated in references / resources section when plan complete.
17/01/2022	Fire Management	Add Fire Rescue Victoria to Stakeholder section Travis will look at Section 7.6 and make comment on document where they need to be mentioned - No response from Travis and unsure how FRV fit into this section as they do not go off road to deal with fires that are on the roadside. Add emcop link to references and resources (this is where most fire management plans can be found)	Have amended plan accordingly
24/01/2022	Fire Management / Weed and Pest Management	The foreword should include a statement that the priority of roads is for safe transport, as opposed to 'functional'. To provide clarity the foreword should specify that this plan is a guidance/reference document of information on the legislative requirements of roadside conservation. 1.2 The road maintenance envelope should make clear it includes roadside drains. Roadside drains are a relevant infrastructure (RMP) for the function of the carriageway. 1.3 It should be made clear that vermin control is permitted on roadsides, and that in relation to fire prevention the Council is accountable for this role. As noted in the Inspector General report of the 2019-20 fires. 1.5 Again, make clear that the Council has a critical role and accountability in fire management. 2.2 There is an inherent conflict in providing wildlife corridors in habitat on roadsides. The conflict needs to be acknowledged clearly and the main purpose of roads – for safe transport – should be restated. Conservation should be managed as should fire prevention. The Local Laws must be reviewed to reflect this and amended to allow crash grazing. 2.3 Remove the term 'adjacent lands' under Disturbance and edge effects. It should be clearly identified that Council is responsible for fire prevention management and that the priority of roads is for safe transport. 3.3 Section 52.16 and 52.17 should appear in an attachment as are critical sections. Particularly the section the parts of this section that gives direction to the steps to take for the removal of native vegetation (as attached). 3.8 Clarity is required as to whether landholders and land managers have responsibility and accountability under the Catchment and Land Protection Act 1994. Section 37 of the CALP Act states that a land management notice cannot be served on the Secretary. 3.18 The Council's Fire Management Plan needs to be publicly available. 5.1 The exemptions for vegetation removal in road drainage systems need to be listed. Council outdoor staff need to receive more information and training on this. 5.4 Similarly to 3.8, clarity is required as to whether land managers have the same responsibilities and accountabilities as landholders. 7.3 Excellent clause, highlight. 7.6 Relevant to CFA, NECMA and FRV and must be highlighted to them. Fire management collaboration with these groups is to be noted. General conclusion: Local Laws need to be reviewed and amended to allow for activities referred to in this document, ie crash grazing. It must be clear that this plan is not a rule in itself, it is a compilation of rules and laws for landholders and land managers to refer to regarding roadside use, management and conservation. The document particularly must note in more rigor that the primary use of the road reserve is the safe egress of the community (2.3 above notes this however should be in the Introduction). This document is a directory of the legislative rules that govern the management of roadsides, and it would be helpful if it was referred to as such.	Foreword updated 1.2 this section includes the drain 1.3 Rabbits are listed, fire risk is listed as an objective however this is not the correct section to expand on Councils responsibility in fire management 1.5 This section is just to list the stakeholders and which roads are managed by those stakeholders it does not go into detail of all the responsibilities. 2.2 This section is giving an overview of the important vegetation and communities that can be found on roadsides and does not go into Councils responsibility for road management and fire management that is covered in section 7 under the specific activities 2.3 adjacent land removed and section already states that Council works with CFA to develop treatments as a part of the Municipal Fire Prevention Strategy (Councils responsibilities in fire management will be addressed further in section 7) 3.3 There are links to DELWP documents in the References and Resources section and section 3.3 has been updated to advise this. 3.8 Ag Vic website clearly states that landholders and land managers have a responsibility under the Calp Act to control noxious weeds. 3.18 Agree this needs to be made public and when the new plan has been finalised and endorsed it will be available on EMCOP and i will discuss having it also available on our RCoW website. 5.1 I have provided a link to the road safety exemption in the resources section, I have also added an action to train our field services crew in how to use and understand this exemption. 5.4 Clarity states what councils responsibility is under the Calp Act 7.6 have refined this section and added an action to work with Community Compliance Team to review and update the local Laws which are due for review.
20/01/2022	Pest Management	In general I consider the RCMP a step in the right direction and includes the myriad of factors need to be considered in roadside conservation management. There is one exception I can see. Under Pest Plant and Animals there should be considerations given to pest pathogens such as cinnamon fungus. This is a serious threat to many species in the Warby Ovens Nat Park to such an extent that many roads and walking trails are closed to reduce its spread. It is also a threat to neighbouring orchards in the area who have to take measures to prevent the movement of native animals that may carry the spores. Control measures, such as cleaning earth moving equipment, are fairly easy and should be routine. More learned conservationists and biologist may also point out other pathogens, such as phylloxera, that also need to be mentioned and control measures implemented.	Have included pest pathogens (cinnamon fungus) to section 2.3 Threats to Roadside Biodiversity under Pest and Weed infestation
18/01/2022	Cultural Heritage	The 2021 Roadside Conservation Management Plan is a very good document but fails to address one of the key objectives outlined in section 1.3 to Identify and protect cultural and heritage values. This is particularly important because many of the significant marked/scarred trees are old and in fact many are dead and therefore not identified as important and are thus subject to indiscriminate removal by burning or for firewood collection. For a more complete plan I suggest that the RCMP should recognize that there has been no systematic identification of Aboriginal Cultural values and the RCoW will work towards collecting this information over the next 2-3 years, whilst noting that a trial to develop a suitable methodology is being currently developed by RCoW and a qualified contractor. This should be acknowledged in the scope as a limitation of the RCMP which council is working to rectify. Some suggestions might be the following: -When assessing tenders prospective roadside works contractors endeavour to gage the level of awareness tenders demonstrate in cultural knowledge. -Insure all council staff involved in roadside planning and operations are sufficiently skilled in cultural heritage identification. -Map all sites reported by observant staff and contractors for value assessment by accredited Cultural Heritage Officers with a view to registering such sites if appropriate. -Ensure VicRoads are up dated on all components of cultural heritage significance where they possess a management interest. -Engage appropriate Traditional Owners to assess the cultural, historic, and spiritual values of each site.	Have included in section 1.3 our current position relating to Culturally Significant sites and the current study underway. Have include an action to train Council staff including depot crew in Cultural Heritage identification RRV have their own policies and procedures and have a dedicated Cultural Heritage Officer
21/01/2022	Conservation Management	Added minor changes / suggestions direct to document.	incorporated changes and suggestions

20/01/2022	Fire Management / Conservation Management / Weed Management	<p>CFA understands that the intent of the Draft Roadside Conservation Management Plan is to provide a balanced approach to the protection and sustainable management of environmental and cultural heritage values on roadsides in the Rural City of Wangaratta, while meeting key functional and fire prevention requirements. CFA also recognises the updates, changes and improvements made to the plan in this 2021 version.</p> <p>CFA has reviewed the proposed draft and provides the following comments and additional suggestions for your consideration: The majority of the rural road network within the municipality is subject to the risk of fire. Fire prevention and mitigation practices undertaken on roadsides assist to:</p> <ul style="list-style-type: none"> <li>• Slow the spread of fire through the landscape.</li> <li>• Allow safer areas for fire fighting appliances to be located while undertaking fire suppression, and</li> <li>• Provide for safer access along roads for fire crews, appliances and members of the public relocating to safer areas.</li> </ul> <p>Fire prevention and mitigation activities comprise a number of forms. In some cases slashing and or mulching are used either as stand alone treatments or in combination with planned burning activities. In most cases planned burning provided the best combination of hazard reduction and cost benefit. CFA is of the opinion that appropriately targeted and timed planned fire and mechanical fuel reduction activities can support the aims of and be of benefit to the Roadside Conservation Plan.</p> <p>7.4 Enhancement/ Rehabilitation of Roadside – Paragraph 2 - CFA has concerns that the doubling of tree planting density is too high, and this advice could lead to increased vegetation levels above the EVC descriptors, and increased fire risk. CFA would prefer to see this restricted to an additional 50%. Dot point 1. Recommended change: • Adequately consider the priorities in the Municipal Fire Management Plan through consultation with the CFA District and relevant brigade. Additional dot point recommended: • Following rehabilitation and enhancement works maturing vegetation should be assessed to ensure adequate and appropriate access for future fire suppression can be maintained.</p> <p>7.6 Fire Management – CFA is concerned that reference to heavier fuels (i.e. being greater than 25mm) will not have the desired outcome; discussion with CFA VMO centred on a dimension greater than 50mm ("wrist-sized"). Fuels of 25mm dimension will ignite and generally burn quickly, contributing to radiant heat. This size dimension (25mm) describes the significant proportion of pruning's and windfall, related to tree head material. Dot point 1 (page 36) Recommended change: • Native grasses generally have lower fuel loads than introduced grasses such as Paspalum or Phalaris species, so retention of native grasses is an advantage. Heavier fuels like branches and logs (greater than 50mm in diameter) are slower to ignite than fine fuels and give off heat more slowly, therefore they can be retained in road reserves while maintaining an effective firebreak.</p> <p>7.23 Weed Control – CFA would like to note that the strategic application of planned burning at the appropriate time has the potential to assist with the long term reduction of fire fuel loads by reducing weeds species and promoting native grasses. CFA asks council to consider adding a dot point highlighting the potential benefit to weed control and fire management where appropriate fire and spraying regimes can be combined.</p>	<p>The NRM and Sustainability team work closely with the CFA and assess proposed roadside treatments every 3 years and agree that appropriately targeted and timed planned fire and mechanical fuel reduction activities not only reduce fire risk but can support the aims and benefits of the roadside conservation.</p> <p>7.4 - paragraph 2 has removed that section that said tree density should be no more than double the EVC density. All plantings should stay within the EVC guidelines for tree density. dot point 1 changed and additional dot point included into plan. 7.6 is this change from 25mm to 50mm for fine fuels something that has been changed across the fire management policies / plans or is this something they would like to see changed (no change has been made to plan yet until further discussion takes place) 7.23 Weed Control - this section is about what property owners can do on roadsides regarding weed control and this does not include the use of fire. It also covers off on the weed management Council do which does not include fire. At the moment fire activities are only undertaken by CFA for fire hazard reduction prescriptions.</p>
24/01/2022	Fire Management	<p>First of all I would like to comment on the present roadsides. They are very unsightly and a huge fire risk when they dry out. I would not send a fire tanker up some of our roads as they stand at the moment as they would get trapped. Paspalum, Phalaris and wild oats have taken over in a big way and must be controlled. Reference was made about grazing those roadsides but the conditions on the Council's permits make it too onerous for stockowners to abide by, plus very few farmers have the time to put stock on roads as most of the younger generation have day time jobs off farm to make ends meet. Grazing would be the best way of controlling the above weeds but it will need a new approach. My other concern is the roots of trees on the sides of the roads are damaging road surfaces especially bitumen roads. These roads have become very dangerous and need attention. Trees have their place in the environment but should be out in paddocks not along roads, they drop limbs which will fall on vehicles and also fall across property fences letting stock onto roads which could lead to road deaths. Another concern is the slashing of roadsides for the protection of houses and property. I believe the area along the roadsides should be extended so landholders can create better fire protection and be allowed to clean up the above area so they can slash without damaging their machinery. One other thing is the envelope area that all roads should have. Machinery is getting larger every year and it is impossible to travel up a lot roads without damaging vital parts of machines. Burning parts of roads would be a benefit but again it comes down to not enough volunteers to man fire trucks plus the red tape to do the operation is too demanding. I have lived in the same house for nearly 77years and I have never seen a lot of the roadsides around here as bad as they are at this time. They are like a jungle.</p>	<p>Natural areas are not manicured and can be perceived as unsightly. The feedback here is more in relation to the state of the road asset and associated infrastructure not the conservation of the roadside. No changes made to document.</p>
28/01/2022		<p>We wish to congratulate Council on the development of this plan. Having read the plan and in particular comparing it with the Roadside Conservation Management Plan 2014 make the following comments. The introduction concisely establishes the importance of the management and conservation of roadside habitat. It additionally comprehensively documents risks and threats and management principles to address these. This document is user friendly in its format and benefits by being concise. The inclusion of mapping within the body of the document greatly enhances its utility. The role of landholders and Landcare Groups in protecting and enhancing roadside ecology is acknowledged and this will be appreciated by those who have actively contributed toward achieving these positive on ground outcomes. We fully support the adoption of this document as a Council Plan.</p>	<p>Positive feedback no changes to plan required</p>
28/01/2022		<p>1.3 Objectives: Cultural &amp; Heritage- There needs to be a greater emphasis on the inclusion of Indigenous Groups. Our Landcare Group has a long association with the Bpangerang people in the RCOW. We wish to see a greater partnership between Council and the Bpangerang in roadside conservation, particularly in recognizing and protecting cultural sites. The current version of the document fails to address one of the key objectives outlined in this section to identify and protect cultural and heritage values. Our comments include references to the submission by Uncle Darren (Dozer) Atkinson (a member of our management committee). With his permission I have included some of that submission here. Please refer to Mr Atkinson's submission for the full detail which our Group supports. This is particularly important because many of the significant marked/scarred trees are old and in fact many are dead and therefore not identified as important and are thus subject to indiscriminate removal by burning or for firewood collection. For a more complete plan I suggest that the RCMP should recognize that there has been no systematic identification of Aboriginal Cultural values to date. That RCOW will work towards collecting this information over the next 2-3 years, whilst noting that a trial to develop a suitable methodology is being currently developed by RCOW and a qualified contractor. This should be acknowledged in the scope as a limitation of the RCMP which council is working to rectify.</p> <p>Section 1.5 Stakeholders: Landholders need to be better engaged with RCOW staff. We recognize there are competing values on roadsides. How Council can achieve a No Net Loss of Roadside Vegetation approach is difficult. One of the biggest issues is regulation and enforcement. Pest Plant and Animals there should be considerations given to pest pathogens such as cinnamon fungus. This is a serious threat to many species in the Warby Ovens National Park to such an extent that many roads and walking trails are closed to reduce its spread. It is also a threat to neighbouring orchards in the area that have to take measures to prevent the movement of native animals that may carry the spores. Control measures, such as cleaning earth moving equipment, are fairly easy and should be routine. More learned conservationists and biologists may also point out other pathogens, such as phyloxera, that also need to be mentioned and control measures implemented. Other pest plant and animals are noted in the document we support the enhancement of these programs. Section 5 General Operations: Our Group has been the recipient of past assistance from Council for roadside pest plant and animal control; we support the continuation and enhancement of this program.E6 Section 2.3 Threats to Roadside Biodiversity: One threat of concern is to the status of the Northern Inland Carpet Python, which you mention in the draft. Our group has almost completed the development of brochure to be distributed to all landholders and stakeholders to protect this species. We support actions in this section. The spread of roadside weeds is a continuing threat and adequate resources need to be provided, Council needs to work closely with adjoining landholders on such programs. Improved mapping of activities is important. Sections 6.4 Connect Roadside Habitat: We support any endeavours by Council to enhance this activity. Our group does sometimes receive funding from government for landholders support in revegetation and native vegetation protection. Some funding by Council to support stakeholders will improve relationships. Section 7 Requirements for specific activities on roadsides: It is important to have programs developed jointly with stakeholders where appropriate. Council needs to adequately resource programs in community engagement and enforcement.</p>	<p>I have expanded on Cultural Heritage and the study that is going to take place. I have included pathogens (cinnamon fungus) in the threats section. We have had updated mapping undertaken by a qualified consultant on weeds on our roadside and this has been added including mapping to section 5.4 Pest Plan and animal control.</p>

28/01/2022	Fire Management	<p>The Wangaratta Group of Fire Brigades supports the objective of the RCMP in promoting good management of roadside vegetation. The Wangaratta Group of Brigades Management Team (GMT) understands the need for a considered document that " will guide actions within the road reserves to promote good management of roadside vegetation". There is no doubt that there is a plethora of Policies and Legislations that need to be considered when discussing the management of the RCOW road network. We agree that the "RCMP must be consistent with other Council policies in road management, fire management and emergency planning."</p> <p>Particularly relevant is the RCOW Fire Management Plan and the associated Fire Management Plan- Roads &amp; Rail Trail (FMP-R&amp;RT).The stated objectives of the FMP-R&amp;RT are around the safety of the lives of road users, the prevention &amp; containment of fires and recovery from fire impacts on our road network. Our view is that the RCMP must be viewed in the context of these objectives.</p> <p>The draft RCMP does not provide a clear connection with the objectives of the FMP- R&amp;RT in its position as a key policy for RCOW. Clause 3.18 Fire Management acknowledges the existence of the RCOW Fire Management Plan- Roads and Rail Trail. But beyond a very brief description, there is no detail as to how these two policies relate to each other in terms of hierarchy and how they are intended to support specific objectives. A prime example of the effect of this is found in the discussion of Threats to Biodiversity in Clause 2.3 of the RCMP. The very broad statement is made that " Fire management needs to balance the hazards from accumulated fuel loads with the ecological requirements of roadside communities."</p> <p>The RCMP fails to provide real guidance here regarding what are acceptable levels of accumulated fuel loads. The emphasis of the document seems to be on the non-disturbance of native flora as much as possible. We believe this understates the risk from over abundant fine fuels that native &amp; exotic grasses and plants can contribute on our roadsides. In effect, the RCMP is often applied to prevent prudent and sensitive fuel reduction, contrary to the objectives of the FMP-R&amp;RT guidelines. This occurs because of the lack of definition on this aspect. Subsequently, that leads to ad hoc decisions that lack a broader view of other policies and guidelines.</p> <p>While the issue of what is a safe level of accumulated fuel loads is not addressed in the RCMP, the native flora and fauna that we wish to sustain and enhance is actually put at greater risk.</p> <p>High levels of fuel mean hotter fires that are ultimately to the detriment of biodiversity. The statement in Clause 2.3 that " Inappropriate management of fire frequency and intensity can lead to a loss of species diversity, a reduction in habitat availability and weed infestation" is clearly very true. The current phrasing around accumulated fuel loads does nothing to define what is appropriate to the effective management of the "intensity" of fire.</p> <p>We believe that the RCMP should be clearer in defining issues such as acceptable accumulated fuel loads. The RCMP should also provide greater emphasis on the relevance of Roadside Conservation Management in protecting our Communities from the impact of bushfire.</p> <p>The list of Stakeholders under Clause 1.5 notes " the CFA has a critical role in the community in preparing for and responding to bushfire threats." We would contend that RCOW is similarly responsible, something that is evidenced in the growing role of Municipalities in Emergency management activities over the last decade or more.</p> <p>With that in mind, we would ask that the RCMP be reviewed through a lens of sensible fuel management that will contribute to the long term environmental outcomes it sets out to achieve. Our lived experience of bushfire in areas of high roadside fuel loads is very much in our minds here. We know that rural roadsides can be a very dangerous place when fire prevails. The impact on communities and natural environments are made worse by poor management of fuel.</p> <p>Finally, we would encourage increased consultation with stakeholders such as ourselves during the development phase of Draft Management plans. As the local frontline responders to fire, engaged in every aspect of the well being of our own community, Wangaratta Group's CFA Volunteers can provide much that is worthwhile to the development of policies and guidelines like the RCMP.</p>	<p>The RCMP is a guidance document only on road side activities, it is not a policy or a fire management document therefore does not sit above any fire management plan and guides you to those plans for how fire risks are to be managed.</p> <p>There was also plenty of opportunities to discuss the RCMP during the 8 week consultation period and staff were present at Moyhu, Springhurst and the library, there were also 2 online sessions.</p> <p>No updated have been made to the plan.</p>
28/01/2022	Conservation Management / Firewood / Compliance	<p>I wish to make a submission in relation to the Draft Roadside Conservation Management Plan, particularly in relation to:</p> <ul style="list-style-type: none"> <li>• The clearance/ "cleaning up" of roadsides for amenity purposes</li> <li>• Roadside firewood collection</li> <li>• Compliance with this plan by Road workers/ contractors</li> <li>• Conservation values of particular roads</li> </ul> <p>Generally I support the Draft Roadside Conservation Management Plan and its aims and actions as it takes a balanced approach to managing roadside environmental values along with other functions on the road reserves. I do feel though that the above areas should be given greater attention as per the detail below.</p> <ul style="list-style-type: none"> <li>• <b>The clearance/ "cleaning up" of roadsides for amenity purposes</b></li> </ul> <p>The plan recognizes the threat to roadside conservation values of "cleaning up" roadsides but mainly in relation to excessive fire prevention works. There is also the very real and increasing biodiversity threat of roadsides being "cleaned up" purely for amenity purposes with shrubs removed, every bit of unidry plant material slashed or piled up and burnt. The cumulative impact on biodiversity is considerable as more and more properties "beautify" the adjoining roadsides and in the process destroy the remaining habitat values. In some areas roadsides are the last refuge for various endangered species and also can be the only remaining biodiversity corridors across the landscape. Any extended length where the habitat has been removed, essentially destroys the corridor, potentially isolating remnant populations. I believe this amenity/ beautification clearance of roadsides should be specifically listed as a separate threat to Roadside Conservation values, with additional actions to mitigate the identified threat. A key action could be ensuring new landholders are aware of the biodiversity values of their adjoining roadside and why it is different from an urban nature strip. This information could cover the inappropriateness of removing native vegetation, doing landscaping works and sowing exotic species on a roadside with conservation values.</p> <ul style="list-style-type: none"> <li>• <b>Roadside firewood collection</b></li> </ul> <p>The Draft Roadside Conservation Management Plan gives considerable attention to road side firewood collection, but I believe it needs to go further.1/ I would like to see commercial firewood collection banned off roadsides. In very recent years there have been two local incidences of quasi commercial operators using a tip truck and front-end loaders to systematically harvest dry roadside timber, both fallen and standing, which was then sold on social media. I would like to see any commercial harvesting banned on roadsides and appropriate enforcement measures included in the plan and implemented.</p> <p>2/ I would also like to see specific community education actions resourced and implemented to help make people aware of their obligations for roadside firewood collection, including the appropriate areas where firewood collection is allowed.</p> <p>3/ In recent years there has been a marked increase in the illegal falling of dry (and green) trees on rural roadsides for firewood. As part of the illegal falling and harvesting of these trees on roadsides, there have been increasing incidents of trees being fallen onto/over roads – fallen over fences, the wood cut and the fence left broken – as well as trees fallen into other trees and then left hanging there, ready to fall on the fence or people or traffic using the road.</p> <p>To date Council has been virtually complicit in this illegal firewood collection and tree felling along rural roadsides through not taking any action to address the known issue and through allowing it to continue. As the responsible authority of the roadsides, I believe Council has a legal obligation to take practical steps to prevent/ stop these illegal and dangerous activities and could have some liability when an accident occurs. The key practical step I believe needs to be specifically listed in the Draft Roadside Conservation Management Plan is actual enforcement of the restrictions on the illegal harvesting firewood from roadsides. On a drive on rural roads on any weekend from Easter to Spring, there can be seen people harvesting firewood, mostly illegally and with impunity.</p> <p>Some weekend compliance checks of roadside firewood gathering would go a long way to having people doing the right thing.</p> <ul style="list-style-type: none"> <li>• <b>Compliance with this plan by Road workers/ contractors</b></li> </ul> <p>I fully support the training of council's road maintenance staff but all contractors undertaking works for council should be trained and made to comply with the Roadside Conservation Plan too. Council's own workers must also be resourced to be able to do their work properly, with appropriate training and equipment provided, particularly for any vegetation control, clearance and/ or trimming works.</p> <p>Conservation Values to be checked on Moloneys Road, Greta West, Lloyds Lane Greta West, Docker / Greta West Rd Greta West and Oxley / Greta West Rd Greta West.</p>	<ul style="list-style-type: none"> <li>• The clearance/ "cleaning up" of roadsides for amenity purposes - paragraph has been added to section 2.3 Threats to roadside biodiversity.</li> <li>• Roadside firewood collection - Commercial firewood is not permitted on roadsides and there is a permit system in place where firewood can only be collected for personal use on low value roadsides. I have updated section 7.7 to make this clear. There is an action to educate the community that firewood collection is illegal and to notify Council if you spot someone collecting on roadsides. Council is also taking action on illegal clearing of roadsides.</li> <li>• Compliance with this plan by Road workers/ contractors - - There is an action to train staff in the area and funds have already been sourced for an external trainer</li> <li>• Conservation values of particular roads - I have sent through the roads of concern to have Steve Hamilton look at the Conservation Value and see if we need to make changes.</li> </ul>