

**Directions for Vegetation Management:
SA Power Networks long-term plan for managing
trees near powerlines**

SUBMISSION

This submission has been endorsed by the 19 June 2014 LGA Board meeting

June 2014

Directions for Vegetation Management

Introduction

Local Government Association of SA (LGA)

The LGA is a membership organisation for all Councils in South Australia and is the voice of Local Government in this State. The LGA is created by Councils and endorsed by the South Australian Parliament through the South Australian Local Government Act 1999 and is recognised in 29 other South Australian Acts.

Local Government in South Australia (SA) comprises 68 Councils of which 19 are metropolitan Councils and 49 are rural or regional Councils. All 68 Councils are members of the Association, as is Anangu Pitjantjatjara Yankunytjatjara. A large land area of the State is not incorporated under the Local Government Act but for the purposes of the Commonwealth Local Government (Financial Assistance) Act comprises five Aboriginal communities and the Outback Communities Authority.

Background

Vegetation management around powerlines has been an ongoing concern for Councils across South Australia. These issues were once again raised during the 7 November 2012 Metropolitan Local Government Group (MLGG) meeting, the City of Norwood, Payneham and St Peters raised the issue of tree pruning around powerlines by SA Power Networks. The MLGG subsequently resolved the following:

'The MLGG requests the Local Government Association (LGA) as a matter of urgency, to prepare a strategy for approaching the Premier of South Australia and the relevant Minister, with a view to ensuring that the State Government has both a clear understanding and appreciation of the issues and concerns associated with the pruning methods used by SA Power Networks and the need for urgent legislation required to address these concerns.'

Under the *Electricity Act 1996* and the *Electricity (Principles of Vegetation Clearance) Regulations 2010*, SA Power Networks has a statutory requirement to undertake clearance of vegetation surrounding powerlines. While the importance of tree pruning around powerlines is acknowledged, the visual outcome and structural stability of trees following pruning has raised some concern amongst Councils and the constituents they represent.

To gain an understanding of some of the issues being experienced, in early 2013 the LGA sought feedback from Councils on key issues identified, outcomes sought and suggested approaches or options in improving current pruning methods.

Issues experienced include:

- concerns with the quality of pruning undertaken;
- that trees had become structurally unsound, pruning wounds have caused branch failures, extensive epicormic growth, sever damage to limbs and in extreme cases, loss of the tree; and
- concern regarding the aesthetic appearance of the tree with trees being left untidy, having little to no shape.

To help address these concerns, the Vegetation Management Working Group was established. The working group is comprised of representatives from metropolitan and regional Councils, SA Power Networks and the LGA and meets bi-monthly to collaboratively develop a long-term vegetation strategy.

The objectives of the working group are to:

- develop a long-term vegetation management strategy that creates a more sustainable environment that minimises the need for tree trimming over time;
- develop a protocol for vegetation clearance that considers factors such as more frequent trimming cycles, agreements with Councils, consultation and communication, and scoping parameters;
- discuss current issues associated with vegetation management and explore opportunities for partnerships in programs or initiatives;
- seek an amendment to the bushfire area boundaries in the Regulations to review the existing classifications and expand the risk-based approach to non-bushfire risk areas and rural townships; and
- explore opportunities for appropriate changes to the legislation and other formal regimes to better balance risk and aesthetic considerations and to develop strategies to seek stakeholder endorsement of those changes.

Through this working group the following options for improvements were developed:

- tree removal and replacement;
- more frequent tree trimming;
- improved pruning techniques;
- development of a protocol for vegetation management;
- development of an appropriate species list;
- amendments to Regulations; and
- arborist skills and contractor management.

It is understood that any amendments made to the current vegetation management practices will require appropriate funding. Currently the program is funded by the Australian Energy Regulator (AER) through the five yearly Regulatory Price Reset process. As part of 2015-2020 Regulatory Reset, SA Power Networks developed a discussion paper in consultation with Councils, arborists, electricity consumers and the working group outlining the proposed long-term vegetation management directions for the next 10-15 years. The overall aim is to develop a long-term plan for vegetation management that creates a sustainable environment and reduces the need for tree trimming over time.

Discussion Paper Feedback

The *Directions for Vegetation Management - SA Power Networks long-term plan for managing trees near powerlines* discussion paper sought stakeholder feedback on the issues associated with vegetation management. In the development of this paper Councils across the state were engaged through numerous meetings and workshops including a workshop held in December 2013 where 16 Councils attended and provided feedback on future directions of vegetation management around powerlines.

The LGA sought Council feedback on the discussion paper via three (3) LGA Circulars as well as through targeted emails, and the Local Government Arborist Group. In particular, feedback was sought on the directions, strategies and initiatives in order to include consumer feedback on the proposals within discussion paper.

Written submissions were received from thirteen (13) Councils including four (4) regional and nine (9) metropolitan Councils.

All responding Councils have expressed their support for SA Power Networks seeking funding through the AER Regulatory Price Reset to enable better vegetation management around powerlines. This discussion paper is a commencing point to develop and improve the current practices vegetation management practices by SA Power Networks.

In addition to this support, some Councils provided supplementary feedback on the content of the discussion paper. The feedback is listed below.

Tree Removal and Replacement Program

Councils generally did not support whole sale removal of trees.

It is recognised that a strategic tree replacement program may be appropriate to help curtail ongoing tree maintenance costs associated with inappropriate trees species or position. However, such a program will not be appropriate in all situations. As such, any removal or replacement program will require careful consideration, consultation and agreement with the Council.

The development of any guidelines to provide parameters for what is defined as an 'inappropriate tree' and parameters for a removal program (including a sapling removal program) must be undertaken in partnership with Local Government. One Council also sought to have any guidelines or removal program consider other benefits the tree may be providing in that location including habitat value, the heat island effect, carbon dioxide storage and oxygen production.

More Frequent Tree Trimming

There is in-principle support for a two (2) year trimming cycle based on species identification and location. This increased frequency will allow for less severe cuts and improve the aesthetics and overall health of the tree.

Pruning Techniques

The pruning techniques employed by SA Power Networks and their contractors have been the most contentious issue for Local Government in South Australia. The trimming practices are based on meeting legislative requirements with little to no regard for structural or amenity considerations. Councils often are left to 'fix up' trees following contractors undertaking cutting as constituents are compelled to question Councils' effort in being proactive in addressing the associated ongoing maintenance costs of poor pruning practices.

Councils remain supportive of the Australian Standard AS 4373 (Pruning of Amenity Trees) in the Regulations. However, it is acknowledged that SA Power Networks does not support the implementation of these Standards. As such, it is imperative that funding be provided through the AER Regulatory Price Reset process to enable appropriate investigation and discussion into an agreed upon standard for pruning techniques.

Furthermore, it is recognised that that the introduction of a different pruning regime or more advanced pruning techniques will likely require a review of the legislative obligations for SA Power Networks. Councils have expressed significant support for the review of the *Electricity Act 1996* and the *Electricity (Principles of Vegetation Clearance) Regulations 2010* to enable these and other relevant changes to occur.

Street Tree Reviews and Renewals

The review of street trees has received in-principle support with potential to tie this type of work into regular Council programs around road reseals and replacement programs. This program of work would need to occur in consultation with Councils.

Protocol for Vegetation Management

Identified as an objective of the Vegetation Management Working Group, the development of a vegetation management protocol is supported in principle. It is understood that this protocol will be developed in close consultation with Local Government, the LGA and appropriately qualified arborists.

Additionally, feedback was specifically received on the 'significant and regulated trees' section of this discussion paper. It has been recommended that this section be reworded to incorporate the definition as used in the *Development Act 1993*. This recommendation has been forwarded to SA Power Networks and it is understood that this feedback has been integrated into the final version of the discussion paper.

Appropriate Species List

Significant support has been provided for the revision of the appropriate species list and matrix of different strategies for different regions.

Community Education and Information

In-principle support.

However one Council did not support cutting/scoping crews consulting direct with land owners on the basis that encouragement to remove trees rather than appropriate tree pruning is a poor starting point.

Changing Current Operational Parameters - Amendment to Regulations

It is understood that vegetation management undertaken by SA Power Networks is heavily regulated resulting in severe cuts to ensure appropriate clearance and buffer zones. Councils continue to strongly support the review of the *Electricity Act 1996* and the *Electricity (Principles of Vegetation Clearance) Regulations 2010* including clearance envelopes, non-bushfire risk pruning areas, and pruning standards.

Any review of these Regulations must be undertaken with significant involvement of Local Government.

Arborist Skills and Contractor Management

In-principle support. It is believed that this additional resourcing will enable SA Power Networks to undertake better quality vegetation management. However, it has been suggested that any person undertaking pruning work should have a minimum Certificate Level III with a Certificate Level IV or greater undertaking scoping of works to identify issues and provide technical advice on best practice outcomes available.

Conclusion

Vegetation management around powerlines undertaken by SA Power Networks has been an ongoing concern for Local Government throughout South Australia. The discussion paper outlines a number of positive and progressive strategies to help address these concerns and the LGA is supportive of SA Power Networks for undertaking such a comprehensive and collaborative body of work. However, this is just the initial step.

These strategies are only achievable through the allocation of appropriate financial resources. As such, Local Government has expressed support for SA Power Networks seeking the necessary financial resources through the AER Regulatory Price Reset process.