

## DTI:Planning Review

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**From:** Ann Doolette [REDACTED] >  
**Sent:** Friday, 16 December 2022 5:23 PM  
**To:** DTI:Planning Review  
**Subject:** Planning System Review Submission - Attention Expert Panel

[REDACTED] [REDACTED]

[REDACTED]

Dear Expert Panel

The evidence is now indisputable. Trees provide the single greatest mitigation against climate change and environmental degradation.

Trees sequester carbon. Tree canopy provides shade and reduces heat, and in particular counteracts the heat island effect prevalent in urban and suburban areas. Trees are the world's lungs.

Yet governments are failing to act to protect our trees.

The South Australian legislative framework, including the Act, Regulations and the Planning Code, can effect change and protect our trees. The South Australian Government must have the will to act and act immediately.

I want the following changes to the legislative framework.

1. Remove the exemption in the Regulations for the Department for Infrastructure and Transport and the Department for Education from gaining planning approval for the removal of trees from land within their management. There are multiple recent examples of the removal of trees around road developments and related infrastructure that could have been avoided with thoughtful engineering that placed value on trees and their benefits. If engineers and other decision-makers in these Departments were subject to external accountability, these poor decisions would be modified. External approval and public consultation are required for more accountable decision-making. While the planting of replacement trees in these locations (and this does not always occur) is welcome, it is many decades before a new tree can provide the benefits of a mature tree. The default position must be that existing trees must be retained.

It takes about 50 years for a large tree to provide the canopy required to reap a tree's full benefits. For example, thirty five years ago, I asked my local Council to plant a tree to fill a gap on the verge in front of my house. It is still only an adolescent (the tree in the foreground) compared to the surrounding trees which would be close to 100 years old. It's full benefit will be for future generations, but must not stop us planting where there are no trees.

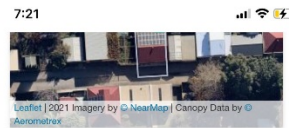


2. Remove the 10 and 20 metres rules for permitting the removal of trees on private property near dwellings and/or swimming pools without external scrutiny.

The Conservation Council's *A Call to Action: Protecting Adelaide's Tree Canopy* reported that Greater Adelaide alone is losing 75,000 trees per year. This figure was validated by the Planning Commission's commissioned research by University of Adelaide researchers. Much of this loss is on private land and it must be reversed through inappropriate rules such as these.

3. Change the definition of significant and regulated trees to: (1) take into account the importance of tree canopy regardless of species and recognise that the circumference of the tree is a poor measure of the importance of mature trees; and (2) increase the list of tree species that can be recognised as significant or regulated – no species should be excluded.
4. Increase the requirement in the Planning Code for the number and size of trees required for new houses and extend this same requirement to house renovations. Not only do trees on private property contribute to a healthier environment, evidence shows the mental and physical health benefits for the people who live there and evidence also shows that there is a financial benefit; property prices increase in treed areas. Trees on private property also provide an individual contribution to climate change mitigations; community education (including through regulation) is needed to inform people of this.

It's not hard to have trees on private property. I increased the tree canopy on my small inner suburban by 10% between 2018 and 2021 with the use of fruit trees. Not only do they provide fruit for humans, they feed the birds and small fauna.



1 The aerial photography used to show your property and property boundary lines are provided as a visual aid only. In some cases, this image can be distorted. This means that the aerial photography of the property and its' boundary lines may not align with the image showing the tree canopy measurements. This doesn't mean the tree canopy measurement is

5. Increase the fee for removal of significant and regulated trees to more accurately reflect the cost of the loss of a mature tree. The more realistic cost is set out in the Conservation Council's *A Call to Action: Protecting Adelaide's Tree Canopy* which are based on Planning Commission's own research; that is, the fee for removal of a significant tree should be at least \$10,305 and the removal of a regulation tree should be at least \$6,870. These costs are the minimum that should be charged because even these costs do not fully take into account the financial cost of the lost benefits over a lifetime of removal of a mature tree (well documented in researchers). If a mature tree genuinely must be removed from a property or it is impossible to plant a tree in a new or renovated house or housing development, then the true cost of this must be borne by the house owner/developer.
6. Use the revenue raised from homeowners/developers not planting a tree to plant more trees. To find the land to plant sufficient trees to compensate the loss over recent decades is going to require the purchase of land for parks for tree planting. Revenue raised must be spent to achieve this. The previous use of the offset revenue raised for other purposes, such as the development of the planning portal, is unethical.
7. Provide the revenue raised from both the fees to remove trees and the fees to offset not planting trees to the local Council where the tree removal occurred or where a tree could not be planted. The current bidding process required of Councils for funds from this revenue is unacceptable. Replacement trees need to be planted in the area where the loss has occurred. Councils need to be given the funds to enable them to do this.

The planning system must be used to protect our existing tree canopy and grow our future trees. The evidence is before us.

A simple example of the benefits of our urban forest is the two street corners adjacent to my house. The one with mature trees surrounding it was 12 degrees cooler than the other corner with minimum tree canopy. The 2018 LIDAR heat mapping of metropolitan Adelaide, done on a 33 degree day, recorded a temperature of 31 degrees where there were trees and 43 degrees in the section with minimal tree canopy, a temperature difference of 12 degrees.


Trees are essential to our health and the health of our environment. The planning system is the mechanism to protect our tree canopy. The system must be strengthened to do so.

Thank you for the opportunity to provide a submission to the Planning System Review 2022. I trust that my views are given genuine consideration.

Regards, Ann

Ann Doolette



 I acknowledge that I live on Kurna and Narungga land and my forebears lived on Kurna, Ngarrindjerri and Peramangk land. I pay my respect to Elders past, present and emerging from these nations.