

To the Expert Review Panel,
Via email: DTI.PlanningReview@sa.gov.au

From: Dr Kathie Muir

12 December 2022

**Submission to – DTI Planning Review
SA Planning, Development and Infrastructure Act 2016
Reform Options**

Dear Panel Members,

Thank you for the opportunity to address you regarding my concerns in relation to our new Planning and Design Code.

My primary concerns are the loss of tree canopy in the Adelaide Metropolitan Region, in particular the loss/removal of healthy, valuable shade and habitat trees due to the relentless process of urban infill.

Background:

I have lived in Henley Beach since 1987, 28 years on the Esplanade and since that time in [REDACTED] St. In that time, I have witnessed the population rise substantially (an increase of over 10,000 people in the wider City of Charles Sturt in just the last 5 years) and, most relevant for my submission, a huge change to the housing profile. For example, in my current street 75% of the original dwellings that were here when we moved in (in 2015) have been demolished and replaced with duplex or 2 freestanding townhouses. In that process every block has been levelled with a consequential drastic reduction in vegetation, particularly established trees. The same transformation is happening across adjacent streets. The tree canopy coverage in the western suburbs of Adelaide is dangerously low with an urban heat sink effect manifesting in higher temperatures in summer, difficulty in cooling overnight, increased glare, heat stress on residents and local birds and animals. This also places stress on the remaining vegetation. Furthermore it results in increased power consumption as people rely on air conditioners for cooling across the whole day in summer as there is little or no shade from adjacent vegetation. (*Western Adelaide Urban Heat Mapping Project Report, 2017.*) The 30-Year Plan for Greater Adelaide, which sees greatly increased urban infill as desirable, will compound this damage and extend it in to other suburbs. I believe the Act should be changed to prevent wholesale clearance before development. Creative design based on retention should be an requirement, not an exception.

Existing laws do not provide adequate provision for protection of vegetation nor is there support for retaining existing trees (as regulations permit removal of a tree within 10 metres of an existing dwelling or in-ground pool or within 5 metres of a fenceline). It would be sensible, and in line with policies in some other Australian states, for this distance to be reduced to 3 metres.

Removal of established, sometimes significant, trees is permitted in too many circumstances and there is insufficient support for the retention and rehabilitation of significant old growth trees. Requiring a developer to plant a new tree is insufficient. Many of the new trees planted are small and non-native. They do not provide habitat

for birds, animals or insects. They often do not provide significant shade and they will take many years, sometimes many decades to grow to sufficient size to provide that shade. Furthermore, there is no monitoring of these trees and frequently one witnesses these trees in newly built homes die from neglect, lack of water or an inhospitable environment. Sometimes they are removed by owners who do not want to be 'bothered' maintaining them. As urban infill occurs more driveways are required in local streets meaning there is less room for street trees and these, often well-established natives, are also removed exacerbating the reduction in canopy. Another factor in the future for trees is that as blocks get smaller and houses get larger the trees planted in back/front yards are usually smaller species, or owners wish to remove them before they grow large. These trees will never reach to protected size based on current limits. If tree protection was changed to a smaller circumference and included height and canopy sizes more trees would be protected and the 'bank' of trees in suburban areas would be improved into the future.

A forward-thinking tree protection policy that would improve the current situation and mitigate the impact of climate change would include:

Introducing a height protection threshold, crown spread protection and species-based tree protections. All of these will assist in meeting our community's overall canopy targets.

Furthermore I would like to see **a change to the definition of 'regulated tree' in line with that of Victoria and NSW which is**

- a) has a trunk circumference of 50cm or more measured 1m above the ground, or
- b) has a height of 6m or more, or
- c) has a canopy of above 9 square metres.

I would also like to see increased protection for large mature non-native trees such as Oaks or Elms, which add significantly to shade and also provide some habitat although not necessarily being food sources. This is important at least in the next 15-20 years whilst new plantings of native trees can become established and canopy cover is critical.

Such a policy would also take account of the increased heat impact of concrete and bituminized verges, driveways and yards that are increasing due to urban infill. Permeable driveways and verges and restrictions on the percent of yard covered by hard, non-permeable surfaces would result in more water being returned to the aquifer and more water being available for uptake by trees. It would also result in lower heat transference.

I would also like to see the establishment of a fund, administered by State Government (that could in part be underwritten by increasing the payments required under the Urban Tree Canopy Offset Scheme). The purpose of this fund would be to support landowners and councils to get professional support to treat significant and heritage trees that are ailing or under attack by parasites.

There is insufficient incentive to retain existing trees at present. The costs for removal of trees by developers or private landowners should be increased so that when combined with the expense of actually felling the tree people may think twice about the expediency of such action. Many trees could be maintained and restored to full health by remedial work undertaken by professionals. This however, can be significantly expensive and may be beyond the resources of private landowners. Sometimes root disturbance from adjacent building and/or roadworks leads to a tree's decline in health, sometimes it is compaction of the ground around the roots, or lack of water. Sometimes it is changes in wind and weather brought about by the

removal of other trees in the immediate vicinity. Or it may be caused by another factor but often these trees can be rescued by appropriate intervention and sometimes by professional pruning. It would be an investment in a more livable city of the State and Local Governments combined to offer an advisory service to local landowners and a grant to pay for remedial work in the case of significant and/or heritage trees.

This is also the case for some trees in parks and along roadsides. It is a tragedy to see large mature River Red Gums with magnificent girths, ailing in our area. There are several examples over recent years I can point to. Along Cudmore Tce on the south side of Henley Beach Rd is a large and venerable red gum, just near it is another which is likewise old but is in poorer health. If that were treated and its health improved it would probably improve the ongoing life span of the most significant one on the corner as their growth is related and each give the other protection from winds. Another example is the group of old growth Eucalypts, probably red gums on the corner of Carolyn Ave and Henley Beach Road. The condition of a couple of the trees in the group is declining but it is possible they could all benefit from appropriate attention prolonging the life of the whole group is much more cost effective and a better investment in the long-term than removing one as their viability as a group is likely to be better than if one or two are removed and only one or two remain.

The increased removal of trees from private property and street trees also leads to changes in wind patterns and less protection for existing trees. Michael Keelan Adelaide nurseryman and columnist for the *Advertiser* reminded readers of that in the aftermath of the significant storm even across Adelaide in November of this year when some people were calling for more trees to be removed (*Advertiser* Nov 19 2022).

I would like to see a realistic value placed on significant large trees that takes account of their benefits including reducing heat, reducing electricity consumption, returning oxygen to the atmosphere, providing habitat for native birds, insects and animals. There are places that put signs beside large trees that attempt to quantify their economic value, provide some context to their age and also the more subjective enhancement of life that locals experience in relation to that tree and its role in their environment. I believe this is a really valuable to educate people as to the multiple benefits of trees in the community on both public and private land. It also helps to contribute to a more informed debate about the role of trees.

I believe education of the wider community and of local government staff and elected members would assist people to view the issue of tree protection and retention in a more realistic light. Too few people think of the real costs before approving the removal of a tree or deciding that is their preferred option. We cannot afford to continue along the trajectory we are going if we are to stay a livable city.

I look forward to the panel making recommendations that match interstate best practice.

Yours Sincerely,
Dr Kathie Muir