


From: Grey Box Community Group  
c/o Secretary of the Grey Box  
Community Group,

  
Secretary Grey Box Community  
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To the Expert Review Panel,

Via email: [DTI.PlanningReview@sa.gov.au](mailto:DTI.PlanningReview@sa.gov.au)

Dear Panel Members,

Thank you for the opportunity to address you on our concerns re our new Planning and Design Code.

Our key concerns are:

1. The loss of established mature trees, and the animals that depend on them, due to residential and commercial development in urban and especially peri-urban areas in SA.
2. On residential allotments, the lack of redress with regards to planting back local endemic plant species as reparation for the removal of any mature endemic plant species as part of any development.
3. The financial cost of particularly mature endemic tree species removal isn't sufficient to have a commercial or residential developer think twice about their removal, rather than changing the design to incorporate/work around existing endemic mature trees.
4. A lack awareness by commercial or residential developers of the local ecology, ecosystem services and resident wellbeing that endemic mature trees provide. An awareness is why other residents may have chosen to live in that area.
5. Loss of the increasingly important protection from heat in streets and gardens, provided by shade from established mature trees

We are keen to see the above concerns addressed for the following reasons:

**Why:** As residents of the Adelaide Hills, we chose to live in the area because of the high prevalence of remnant ecology, most notably manifest as mature endemic Eucalypt trees. Along with the uplifted topography the mature endemic trees in our eyes are the defining characteristic of where we live. They provide a sense of place and wellbeing to us as residents, particularly because they provide habitat for a wealth of local endemic species, both plants and animals. These include birds, possum species, bats, Koalas, reptiles, insects (e.g., native bees, butterflies, and spiders), as well as a diversity selection of endemic understory species, wattles, native pines, lilies, pea species, daisies, sedges, and orchids.

In addition, there is ample scientific evidence to show that tree canopy is one of the best ways to mitigate against urban heat island effect. Given the climate crisis we are currently facing, we need to move swiftly to ensure that we leave the best possible outcomes for our children and grandchildren. This would specifically include protecting any mature trees, as

they are effective protection against urban heat, and because they embody large amounts of carbon.

**Local Action:** In the past, we have been dismayed and grieved by the loss of local mature endemic Eucalyptus trees in suburban allotments in our area. Anecdotally there seemed to be an increase in tree clearing. So, after a groundswell of community concern, a self-organized community meeting was held at the Eden Hills Primary School in 2007, which was attended by several hundred residents of the Blackwood area. It was a forum to voice our concerns and gather ideas as to what should and could be done.

As a result, over a decade ago, the Grey Box Community Group (GBCG) was formed by concerned residents of the peri-urban suburbs around Blackwood. As per our founding motto, we set about to Educate, Protect, Care and Restore our local biodiversity. And so, we named our group after the common name of the dominant Eucalypt species in our area the *Eucalyptus microcarpa* or Grey Box tree, which is a keystone species in the ecological association 'Grey Box Grassy Woodland'. This ecological association is recognized under the Federal EPBC Act 1999 as a nationally threatened ecosystem (<http://www.environment.gov.au/cgi-bin/sprat/public/publicshowcommunity.pl?id=86>).

For more than 10 years we have agitated for:

1. Better planning decisions, such as recently:
  - a. Working with the Sturt Lions Football Club to modify their proposed pitch development of Karinya Reserve (Eden Hills) to not need the removal of large numbers of mature Grey Box trees.
  - b. Clarifying to the community and authorities the tree and biodiversity losses that would be caused by the Soccer Oval development of the old Belair Golf Course on Upper Sturt Road.
  - c. Opposing the over development of the James Road intersection which would result in the excessive loss of mature endemic trees for possibly no improvement in traffic management.
2. Provided support to residents in the Grey Box Grassy Woodland area:
  - a. By holding **Grey Box Day** for over 10 years either with SA Government small grants funding or in conjunction with State Flora. This has involved making for sale subsidized plants species that are endemic to the Grey Box ecological association (~7000 tube stock plants per yearly event), with the primary aim to provide the means for residents to improve local biodiversity on their properties by planting endemic species. We also use Grey Box Days to educate the local community about the importance of local native plants.
  - b. **Involved in community events** promoting the improvement of local biodiversity. Such as at the recent Climate Action Resources Expo - Sat 26th Nov., organized by the Blackwood Uniting Church.

For above reasons that aim to protect (in line with our motto) our endemic biodiversity, we ask you to support the following:

The 10 recommendations for SA Law Reform of Urban/ Native Vegetation as put forward by the Conservation Council SA.

[https://www.conservation.sa.gov.au/top\\_10\\_urban\\_tree\\_law\\_reform\\_priorities](https://www.conservation.sa.gov.au/top_10_urban_tree_law_reform_priorities)

These are well considered and researched priorities. The two reports (at the webpage below) benchmarking SA's Tree Protection Laws against interstate jurisdictions, demonstrate the comparative paucity of SA's laws and a clear case for improvement.

[https://www.conservation.sa.gov.au/tree\\_resources](https://www.conservation.sa.gov.au/tree_resources)

We look forward to the panel making recommendations that match or exceed interstate best practice. Allowing councils greater say over which trees are protected and in which circumstances would do this and would also meet community expectations for their local area.

Your sincerely,

Grey Box Community Group

