From: Michelle Hogan
Port of Adelaide National Trust
Via email: [redacted]

To the Expert Review Panel,

Via email: DTI.PlanningReview@sa.gov.au

Dear Panel Members,

Thank you for the opportunity to provide a supplementary paper on concerns regarding preservation of trees in planning developments, as part of the Port of Adelaide National Trust Branch submissions re the review of the Planning and Design Code.

The PoANT Branch has instigated a new project over the 22/23 and 23/24 financial years to address the loss of heritage/significant trees on the Port Adelaide Peninsula and throughout the western suburbs. A key outcome of the project will be participation by the community in a citizen science initiative to record significant trees held on private property, through photographs and consistent measurement, and the lodgment of the data with the Port Adelaide Enfield Council. This currently unrecorded knowledge will raise community awareness of the important environmental and general amenity role of significant trees and hopefully assist in the preservation of trees prior to applications to remove for development.

There is ample scientific evidence to show that given the climate crisis we are currently facing, tree canopy is one of the best ways to mitigate against urban heat island effects. In the West we do not have enough tree canopy and new tree planting requirements in development applications, while admirable and supported, simply cannot address on their own the impact of the rapid removal of significant trees from development and sub division. We need to move swiftly to ensure that we leave the best possible outcomes for our children and grand-children.

In particular, we would support the following:
Removal of exemptions from existing Regulated / Significant Tree Protections and Native Vegetation Regulations
Review and modification of the list of tree species exempt from being classed as regulated / significant to better reflect the South Australian environment
Bringing SA into line with VIC and NSW by changing definition of regulated tree to one where the a trunk circumference of 50cm or more measured 1m above the ground or has a height of 6m or more or has canopy over 9sqm.
Incorporation of Vegetation Overlays into the Planning and Design Code, similar to those used in Victoria, to better reflect the expectations of local communities by allowing for the protection of significant urban vegetation
Removal of the ability to prune up to 30% of a regulated / significant tree without requiring council approval and implement a system that requires the use of the AS4373 Standard
Increasing the use of arborists to assess applications affecting significant trees and allow for a more rigorous approval process for applications to remove regulated trees
Restoration of the requirement for the Department of Infrastructure and Transport and the Department of Education to publicly consult and gain planning approval to remove regulated trees

Modification of the Urban Tree Canopy Offset Scheme to better reflect the value of trees to the community by;
- Increasing the fees to match the costs incurred by Councils to plant, establish and maintain replacement trees; and
- increasing the number of trees to be planted

Introduction of the following requirements where permission is granted to remove a protected tree:
- Homeowners to replant or make a financial contribution for the loss of that tree at a set rate significantly bigger than currently set
- Developers to replant and make a financial contribution which will depend on the size and location of the tree they are seeking to remove

The removal of protected trees should not be allowed until all relevant planning and development approvals have been granted.

I look forward to the panel making recommendations that match 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,

Michelle Hogan

Port of Adelaide National Trust.