

Submission to the Planning System Implementation Review, regarding tree loss: Renewal SA, Private Developments and schools impact on green spaces

Trees often seem to be razed to allow for temporary construction convenience. It's unfortunate that there isn't more emphasis in the Development Act or P & D Code, on Ecological, Environmental, and Mental Health benefits of old growth habitat, as we'd likely have less contentious designs for major projects

Renewal SA's portfolio has a huge foot-print, which includes public assets such as Housing Trust homes, former schools, TAFES, fire stations and health facilities such as Glenside and Oakden.

Renewal SA has been selling off many rezoned allotments all over the metropolitan area, catalogued on their website. <https://renewalsa.sa.gov.au/for-sale/land-sales/>

Many of these tracts of land have old growth vegetation being systematically cleared.

Renewal SA's Renewing Our Streets and Suburbs program (ROSAS), aimed to renew all pre-1968 SA Housing Trust housing over 15 years, with its priority up to 2020, being those houses within 10km of the CBD. This accounted for approximately 4,500 SA Housing Trust homes.

As an alternative to the Standard Pathways, the ROSAS program was able to be facilitated through Schedule 1A of the Development Regulations 2008. This allowed Renewal SA (as agent for SAHT or private community provider), to lodge applications for dwellings and associated land division proposals, direct with the State Coordinator-General (or one of the assistant Coordinator-Generals).

There was no specific requirement for consultation on applications dealt with under the ROSAS program. Development plan consent was not required for this programme, so Councils and communities were at times not consulted. What was the impact of that to our metropolitan vegetation?

Example1

Below is a satellite image of former Enfield High at Gepps Cross, which was sold for urban infill development. Every tree in this image (bar 2) has since been destroyed, several were Significant and Regulated natives



This suggests that other former school sites sold by Renewal SA will befall the same fate. (Former Davoren Park High School has been sold for infill and the site is in the process of having its many trees destroyed. Appendix 2)

Possibly supported by **Schedule 14 of the Development regulations** (see Appendix 1)

The next series of 3 photos below of former Enfield High were taken from Coles St facing West, from approximately the red X in Picture1 above

GOING (this image was taken from Google street view)



GOING



GONE



Example 2: Glenside

During the initial community consultation, in the Glenside **Preliminary Master Plan Brochure 2015**, the first topic in the community feedback summary, discussed the importance of keeping the Significant trees. (Something that was subsequently ignored)

Further on, under the heading of "Open Spaces and Trees" it says "PROPOSED BUILDING AREAS AND ROAD RESERVES HAVE BEEN CAREFULLY LOCATED TO ENSURE ALMOST ALL OF THE SIGNIFICANT AND REGULATED TREES ARE PRESERVED"(The capitals are a bi-product of the copy and paste from the document).

This statement proved false as over 80 regulated and significant trees and hundreds of smaller trees, were wood chipped.

Attached is the plan that indicates the Significant and Regulated trees removed at Glenside, for urban infill. Approval was given for the tree removals, before any plans of the new development were publicly accessible, allowing a blank canvas for the developers

This was overseen at the time by John Hanlon of Renewal SA.



The remaining trees adjacent to Fullarton Road are now potentially under threat due to the addition of more road lanes for the Fullarton Glen Osmond intersection upgrade. Diagonally opposite the site in Park 16 and Bluegum Park, a further 120 trees were slated for removal, for storm water management

<https://yoursay.cityofadelaide.com.au/46448/documents/106729>

Below, some of the former Glenside trees.

People in the first photo indicate the scale of the 80+ trees lost



Below, during the tree removal period



The Glenside scenario is repeating throughout metro area in Renewal SA's massive land sales.

Example 3: Is Oakden the next Glenside?



Are the 1000+ trees at Oakden, going to suffer the same fate as trees at other Renewal SA sites, such as Glenside, Enfield High or Daveron park? Where, every stick has been wood-chipped, with no attempt to integrate old growth with new development.

Black Cockatoos can be found at Oakden, pressured from their usual southern habitat.

<https://renewalsa.sa.gov.au/projects/oakden-gilles-plains/>

The shaded area in the satellite image below indicates the footprint of the proposed urban infill development



While there are several Significant and Regulated trees on the site, many trees at Oakden are unprotected, as they are 50 to 60 years old and yet to comply with regulated definition. Given enough time they will grow to be Significant

Below are a few of examples of the many huge and healthy trees under threat from infill development at Oakden



Example 4: Renewal SA Former Richmond Rd Marlestone TAFE site

Before

After



There are still huge trees on the former Marlestone TAFE site site, what will befall them?



Example 5: Private Development Tree Removals

Private developments, have been a key contributor to the loss of Adelaide's green spaces
These next images are from Torrens Road Woodville
The buildings and trees already co-existed, but the trees were inexplicably still removed

(the next 10 images are from Google Street View)



After



Below: another tree loss, at a private residence, this time on Burbridge Road. Once again the tree isn't in way of new construction or infrastructure and is well away from existing building.



After



Example 6: Public Schools

Now that Schools are exempt from requiring planning approval to carry out tree damaging activities (see **Schedule 14 of the Planning Regulations**), an untold number of regulated and significant trees have been destroyed

Before, Christ is King School, Warradale



After, Christ is King School, Warradale



Example 7 Many Sporting clubs have lost native vegetation. Before, Brighton football Club, A stand of large native Casuarinas



After



Example 8: Poisoning of healthy old growth trees is a common, ongoing issue throughout the metro area and it seems very few unapproved tree removals are successfully prosecuted.

Here's a link to a recent news story in Victoria, it highlights how ineffective SA tree laws are. In Melbourne, "Under local law, the owner or owners of private land where a tree has died is guilty until proven innocent. The onus is on the title holder to prove that someone else was responsible"

<https://www.9news.com.au/national/pensioners-accused-of-tree-poisoning-melbourne/44fcb9a2-7fc2-4f1a-af9f-119b1de032bf>

If only SA had a similar legal approach. We certainly need it.

The tree below is an example at Rowels Ave Lockleys. After witnesses observed poison being applied into predrilled holes on the trunk, the West Torrens Council intervened and the tree has started to recuperate. A council staff member confirmed that an earlier removal application had been rejected by council



Example 9: the Springwood Development



On February 13 2020 the State Commission Assessment Panel approved the removal of forty-seven (47) regulated trees and forty (40) significant trees. For a new subdivision east of Gawler called Springwood.

[https://www.edala.sa.gov.au/Content/928000/928603/DNF Land Division - Town of Gawler - DA 490 D026 19 - ID 65313 - Arcadian Communities .pdf](https://www.edala.sa.gov.au/Content/928000/928603/DNF_Land_Division_-_Town_of_Gawler_-_DA_490_D026_19_-_ID_65313_-_Arcadian_Communities_.pdf)

SCAP approved the destruction of the trees without having assessed an arborist report, as the applicant did not provide one. The SCAP Code of Conduct, Part 10 states. "A member of an assessment panel must take all reasonable steps to obtain all relevant facts and information when making a decision on a matter before the panel"

The ekistics report, contained in the Council assessment panel attachments (in link below on page 183 of 851), there was a considerable mistake presented to SCAP. Tree numbers on site are substantially inflated and not representative of what is on the ground. Ekistics added 101 phantom significant trees and 96 phantom regulated trees to be retained; incorrectly claiming that only 23% of the significant and regulated trees are to be destroyed. Simply counting the trees on the Tree retention Map confirms this. (See Appendix 3 below)

https://www.gawler.sa.gov.au/_data/assets/pdf_file/0019/216541/22-07-2019-council-assessment-panel-attachments-under-separate-cover-item-6.1-part-1.pdf

An application for clearance of the first 27 trees for Village 3 of the Springwood Estate development was conditionally approved by the Native Vegetation Council. The NVC approved the destruction of 17 trees of the 27 trees for Springwood Village 3. Many were ancient Mallee Box trees.

Is it appropriate that SCAP assess native tree damaging applications before they are given consideration by the Native Vegetation Council? Would it make more sense to go to the NVC before SCAP?

The EBS report incorrectly claimed there was no remnant understory. There is at least five types of native grasses and plants adjacent to most of the trees.(see photos below)<https://www.environment.sa.gov.au/topics/native-vegetation/consultations>

Some examples of the native understory photographed at the site recently, includes Spear-grass, Climbing Sundew, Wallaby-grass, Woodland Creamy Candles and New Holland daisy





The trees on the site appear to be ancient and healthy. Unfortunately many of the bigger, more spectacular trees are under imminent threat, along with Kangaroo grass.

Mallee Box open/grassy woodland is regarded as a threatened ecosystem in SA by Nick Neagle who did work for DEW/DEWNR. When doing a web search for Mallee trees, there was only one example that had a similar lignotuber to the threatened Springwood trees. The tree is in the Murray Bridge area and has been added to the national Register for Big Trees. The tree is estimated by the Register to be between 200 to 500 years old.

The next links to an article on the Murray Bridge Mallee

<https://www.murrayvalleystandard.com.au/story/4036701/ancient-mallees-historic-roots/>

This is supported by Associate Professor Craig Nitschki, of the University of Melbourne, also stated that “The Mallee Box trees, East of Gawler, are hundreds to thousands of years old.”



The green spaces to remain on the development map are mainly inhabited by smaller trees and olive trees. Most of the unique old growth specimens will be destroyed.

The tree below has recently been destroyed, as part of the Village 3 application to the NVC
Before Tree4 (Its NVC application name)



After Mallee Box trees can survive being burnt to the ground and still have their lignotubers regenerate. (Tyson et al 1998 Mallee Ages) This suggests that tree 4 below could have survived the severe pruning it suffered and also damage to some of its southern roots. It wasn't in direct path of new road or buildings.



The Development is rolling out in a modular fashion, so there may be some time before the area with most of the trees is cleared. Perhaps with increased community awareness the plans can be modified? Time is short as SCAP has already approved of the removals without acknowledging their historic value or conservation status.

Red gums such as this one below are also under threat. Note how Gary the 6'2 person at its base, is dwarfed by this gum



2 example of the huge lignotubers of these rare giant Mallee Box trees



There's also no assurance that the trees bordering the site will remain. Photo below, is an example of the trees on the eastern perimeter of the development. It has a 7 meter circumference. These trees are adjacent to the Balmoral Track. If the track is developed into an access road, the trees can potentially be cleared without planning approval or notification, care of **Schedule 14 of the Development Regulations (Appendix 1)**



There is quite a bit of un-wooded land available within and around the Springwood footprint, without destroying the amazing natural assets there. If the developers are directed to modify their plans, the retention of this forest of huge and unusual Mallee Box trees will likely add value to the adjacent properties

Added red circles to the map below, show that the areas with the majority of the remnant Woodland to be removed, is greater than the area of Mallee Box to be retained. They are also much healthier and larger examples than the remaining trees left on steep inclines.

The developers claims, that “the majority of Eucalyptus porosa trees (Mallee Box) have been incorporated into open space areas” is simply not true. Many smaller Mallee Boxe trees also, aren’t indicated on the map



Given the potential age of some of the 17 Mallee Box trees already destroyed (being over 1000 years old), was the SEB offset payment of \$ 50,098 adequate?

The Springwood development application was prepared by “ekistics” Coincidentally, Rebecca Thomas a Senior Associate at “ekistics” is also the Presiding Member of SCAP

Gawler

An earlier application for Removal of another 37 Regulated trees(including 11 Significant trees) approved 02/10/18 is here https://www.edala.sa.gov.au/Content/928000/928603/DNF_Land_Division_-_Town_of_Gawler_-_DA_490_D026_19_-_ID_65313_-_Arcadian_Communities_.pdf

https://saplanningportal.sa.gov.au/public_register#view-3172-LUA

Here's the detailed tree report, with shots of the trees and their location.

https://www.gawler.sa.gov.au/_data/assets/pdf_file/0026/218609/25-06-2018-council-assessment-panel-attachments-item-5.5.pdf

Once again as per DIT practices, many of the removed trees were not in direct way of the road

Harold Tyler Reserve Trafford Street (The Parks Sports Centre)



On Monday 16-11-20, drove past the Parks in Mansfield Park and saw total destruction of Harold Tyler Reserve. Couldn't locate an application to this portion of the sports ground on Trafford Street

Before. Looking N/E From Trafalgar Street. Taken Approximately from red X on Map above



After



Some of the Stumps



Displaced former inhabitant



Marion Shopping Centre Development Number: 100/E103/18

This Category 2 application that was before the SCAP was somewhat ambiguous in relation to the Regulated trees in the Planning Report prepared by MasterPlan SA Pty Ltd. It does not comply with the Marion Council development plan and does not demonstrate clearly that all development options have been considered to avoid damage to the threatened regulated trees

In page 38 of the report it states “None of the trees would be highly valued for habitat as they are isolated and in an extremely modified built environment.” This is a falsehood, not supported by the Arborman Preliminary Tree Assessment. In fact the threatened trees are occupied by many native birds, which can be seen and heard clearly by passer-bys all year round. On day of photograph, 28 native birds of various species inhabited a single tree (R-5). Posing the question; “What other inaccuracies are in the report?”

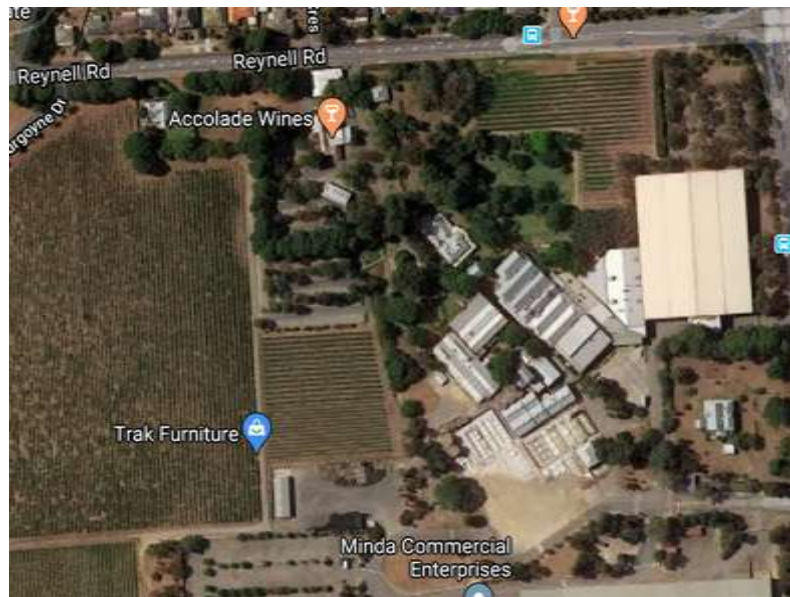


Tree (R-5) can be seen on the far right of above picture. Looking south from the Culture Centre, with Access 11 on the far left. Every tree in this photo will be removed in the current plan. Most are not in the path of the proposed building and multi-story car park expansion. In Page 9 of the application it is claimed; “ Whilst removal of any trees is undesired, the planning and design process has specifically sought to minimise this impact, and the new landscape strategy is developed to provide an improved overall landscape and pedestrian environment than existing.” Access point 11 is proposed to be denuded as part of this “improvement”. It will be at the same location and still have the same median strip. Has every effort really been made to incorporate existing vegetation?

Access point 11



Old Reynella Winery site:



What will befall the stands old growth trees at this site?



There are many other developments pending that will significantly reduce to metropolitan tree canopy in the near future.

Poor planning, with little environmental consideration is all too common in these supposedly enlightened times. Particularly since tree protection laws have been diluted to the point of being ineffective. It appears the majority of SCAP panelists past and present are, or have been developers in the private sector. They have approved most development applications before them and shroud their activities in secrecy.

Many within the community are busy going about their business and taking care of their families, hoping their elected members and public servants are doing the right thing with the power entrusted in them. There is also a general sense of fatigue, frustration and remorse when it comes to development issues. Most concerned citizens won't make submissions to SCAP, Legislative Review Committees, the ERDC, the NVC or Planning reviews. Simply because it's hard, time consuming and there's little evidence to suggest their efforts have made any discernible improvement in outcomes. There is a genuine sense of futility and dis-empowerment. Still, to sit in silence while these atrocities take place would imply acceptance of these poor practices.

Yuri Poetzi
Christies beach 5165

Appendix 1

Schedule 14—State agency development exempt from approval 1

(1) The following forms of development, other than in relation to a State heritage place or within the Adelaide Park Lands, are excluded from the provisions of section 49 of the Act:

(v) tree-damaging activity in relation to a regulated tree— (i) that is on any land—

(A) on which a school, within the meaning of the Education and Early Childhood Services (Registration and Standards) Act 2011, is located or is proposed to be built; and

(B) that is under the care, control or management of the Minister responsible for the administration of that Act; or

(ii) that is on any land—

(A) on which a road is located or is proposed to be built or widened; and

(B) that is under the care, control and management of the Commissioner for Highways; or (iii) that—

(A) is on railway land as defined in Schedule 3 clause 13(5);

or Development Regulations 2008—15.8.2019 Schedule 14—State agency development exempt from approval 6

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(B) is on land adjacent to railway land and is, in the opinion of the Rail Commissioner, detrimentally affecting the use of, or activities or operations on, the railway land.

Appendix 2

An Advert for the sale of the former Daveron Park High School; cleared for high density urban infill.

42 BUSINESS JOURNAL

Good opportunity with land release

A MAJOR release of 9,885 hectares of land has become available in Daveron Park. Comprising the former Para... adult campus, the prop... the benefit of three... advantages. ... retains a number of ... two storey buildings ... than 9000sqm. ... surrounded by ... networks have ... commenced nearby for a new shopping centre opposite the site at the corner of Petherton and Stebonheath roads. The substantial nature of the site, zoned suburban neighbourhood, could allow a wide range of development options or reuse for educational purposes (etc). Expressions of interest close at the offices of Renewal SA on Friday, April 7.

FAST FACTS

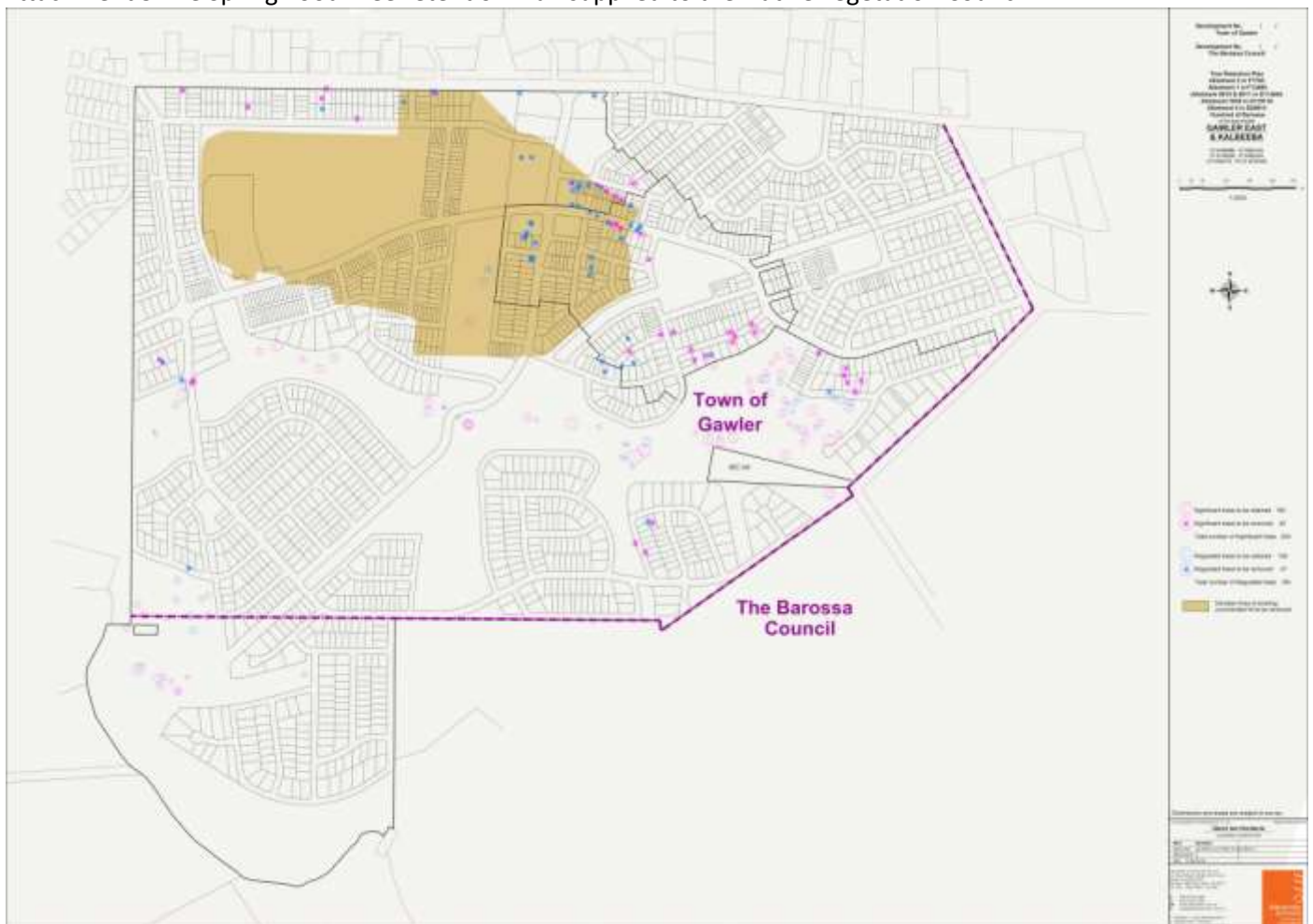
DAVOREN PARK
Address: Crafter Street, Davoren Park
Property type: Land
Agent: Savills, Steve Bobridge
0418 835 525; Rob Williamson
0412 803 482

See next photo of some of the tree stumps at former Daveron Park High School



Appendix 3

Below the Springwood Tree Retention Map supplied in the Category 1 Development Application Figure 4.25. Also Attachment 5 The Springwood Tree retention Plan supplied to the Native vegetation Council



Below is a close up of the legend with the incorrect numbers of trees retained

	Significant trees to be retained	160
	Significant trees to be removed	40
	Total number of Significant trees	200
	Regulated trees to be retained	136
	Regulated trees to be removed	47
	Total number of Regulated trees	183

When counting the actual trees on the map and at the site, it reveals the totals have been substantially inflated. See actual numbers of trees in Red below

	Significant trees to be retained	160	Actual (59)
	Significant trees to be removed	40	(40)
	Total number of Significant trees	200	(99)
	Regulated trees to be retained	136	(41)
	Regulated trees to be removed	47	(47)
	Total number of Regulated trees	183	(87)

