

Dear Expert Review Panel,

Trees for the Future, Mitcham, is a new community group that has been setup for residents who live in the City of Mitcham. The aim of the group is to connect those who are interested in learning more about trees, their importance and helping to protect our tree canopy for the future.

The City of Mitcham is extremely lucky to have on average, high levels of tree canopy cover. This also puts us in the unfortunate position where Adelaide's weak tree protections are being keenly felt by the community as they see their tree canopy disappear on a weekly basis.

We do not believe that the protections for trees in the Planning and Design Code are sufficient enough to retain Mitcham's tree canopy coverage for future generations to enjoy. Given the Labor Government's pre-election commitment to matching 'best practice' tree protections, we hope the panel will take this opportunity to make bold changes to tree protections that meet the expectations of the local community.

It is with little doubt that the community expectations inside the City of Mitcham are to provide better protection for trees. We do not see how this can be done if the State Government continues to set rules that apply across the entire state. Vegetation across the city plays a critical role in the character of the local area, from the avenues of trees in the State Heritage Listed Colonel Light Gardens to the semi-rural characteristics of the Mitcham Hills. Local residents put significant pride and value on their tree canopy as it is an asset that in many situations, cannot be easily replaced.

To this extent, we would like to endorse the valuable work that the Conservation Council of South Australia and their partner organisations have done in this area to come up with practical solutions to prevent the unnecessary removal of large trees.

The proposed solutions outlined in their "[Top 10 – Urban Tree Law Reform Priorities](#)" align with the challenges facing the retention of tree canopy across our suburbs.

In particular, the following points are of particularly relevance for the City of Mitcham:

- *Priority 1* – Removing exemptions from existing Regulated / Significant Tree Protections and Native Vegetation Regulations
- *Priority 2* – Bring SA into line with Victoria and New South Wales by changing the definition of a regulated tree to one that:
 - o Has a trunk circumference of 50cm or more measured 1m above the ground or
 - o Has a height of 6m or more or
 - o Has a canopy of over 9sqm
- *Priority 3* - Incorporating 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
- *Priority 4* - Implement new bushfire clearance allowances that reflect the Bushfire Attack Level rating for the property
- *Priority 9* - Increasing the costs associated with removing a protected tree

There is substantial overlap in the City of Mitcham between the protections (or lack thereof) of regulated trees and native vegetation. This area needs to be looked at as it is confusing for homeowners and builders. We note that the Mitcham Council has recently written to the Minister for Climate, Environment and Water, Susan Close MP, requesting to be authorised under the *Native Vegetation Act 1991* to assist with compliance in this area. Currently, Mitcham Council is powerless

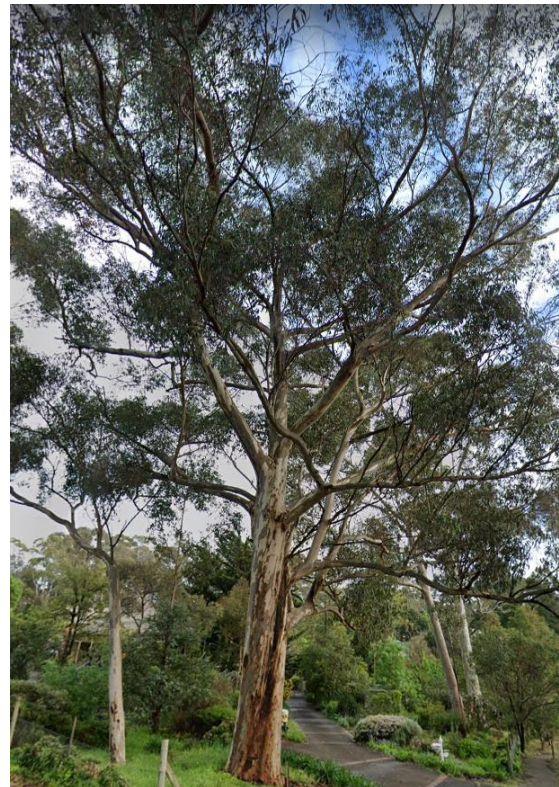
to stop the illegal removal of native vegetation from residential properties, despite being in the best position to be able to do this.

Due to the lack of protections for trees in the Mitcham Hills area, one member of our group is embarking on what we believe to be an Australian first. This member has been approached by numerous developers wanting to re-develop their block of land. Out of concern for the number of large trees on it, they are going to place an encumbrance on their land to protect the trees on it.

This will prevent the trees from being removed when the land is sold, (unless unhealthy or dangerous) or a substantial financial contribution is paid. Trees are extremely valuable and as part of this process, this group member has had their trees valued using the Arboriculture Australia tree valuation method (MIS506 Tree Valuation). This method reviews a range of existing tree valuation methods used across Australia and New Zealand, outlining the features of the various systems and the factors used when calculating amenity tree valuations. MIS506 Tree Valuation outlines a new method which is a fusion of the various existing methods of tree amenity valuation. The simplified formula for individual tree valuation is as follows:

Valuation = (Market baseline value) x (Land use factor) x (Social factor) x (Quality Factor).

- *Market baseline value uses trunk diameter at breast height and considers the phase of tree growth (young/semi-mature/mature) to determine the baseline value of the tree. The baseline value in 2022 is \$16.78/cm² trunk area.*
- *Land use factor considers land use zones based on local/state government zoning areas, including residential zones, public recreation zones, infrastructure zones and conservation zones.*
- *Social factor considers a range of variables including the tree relationship to other trees, ecosystem considerations, human population density and tree significance (indigenous/cultural/heritage/scientific).*
- *Quality factor considers a range of factors relating to tree vitality, health, vigour, form, structure and life expectancy.*



This Sugar Gum was valued at \$92,804

The value of the trees on the property ranges from \$92,804 to \$19,382 under this method.

Despite this substantial value, should this land be sold, the trees could be cut down tomorrow without requiring any council approval. It is extremely frustrating that individual members of the public must take course of action like this to protect such valuable community assets. The opportunity for change in this area is now. A one-size-fits all policy in relation to tree protections does not work and we hope the Expert Panel will make courageous recommendations in this area so that future generations have tree canopy to enjoy and benefit from.