



Horticultural  
Media Association  
AUSTRALIA INC

The Horticultural Media Association SA Branch, is delighted to provide its feedback to the Planning System Implementation Review process. Our comments are focused on the review of the Tree Policy related areas in the Planning and Design code. However, overall the review process appears to be informed, systematic and inviting of community comment.

With regard to the treatment of the Tree and Native Vegetation related areas in the Planning and Design code, we generally support the findings of the review and seek further investigation into areas of concerns that have been raised, using contemporary consultation methods to seek the most fair and reasonable outcome for current and future generations and environment.

We agree that the key issues include:

1. a decline of large urban trees and species diversity across metropolitan Adelaide is leading to a decline in overall urban tree canopy cover;
2. that current urban infill policies, which favour commercial, industrial and private development are contributing to the loss of trees; and
3. this loss will be exacerbated due to the anticipated increases in temperature, reduced rainfall and increased storm damage.

With reference to the current Planning and Design code, we agree that:

1. exempt tree species list as per regulation 3F of the PDI Regulations is not contemporary and should be updated;
2. circumferences for a tree to be considered regulated or significant in the PDI Regulations are definitely too generous and should be reviewed and would be more appropriate to be similar to the distances regulated by interstate jurisdictions;
3. exemptions with respect to certain tree species located within ten (10) metres of a dwelling or swimming pool are definitely too broad, and should be considered in light of the approach in other jurisdictions also; and
4. current offset fees for the removal of regulated or significant trees are inadequate and insignificant against the value of trees to the community and cost to maintain healthy trees over their lifespan in the public realm and should be reviewed.

We acknowledge the Review Panel is focused on trees in the private realm, in the context of the Code (and the PDI Act), however the Code regulations directly impact the public realm and those with management responsibility of this open space. The future cost of managing the tree asset is currently deferred from private lands to public lands without due financial or risk management support.

We also support commercial and industrial developments contributing financially if their approved developments cannot adequately support tree canopy provision. Further, we would seek the establishment of an independent expert panel of suitably qualified arborists and planners to mediate when there are disputes over trees.

We support the initiative to consider a holistic response which includes achieving sustainable landscaping as part of new developments and Water Sensitive Urban Design (WSUD) across the State.

Impacts on native vegetation are being considered very late in the planning process and the lack of legislative alignment and coordination between the former planning regime and the Native Vegetation Act does lead to inconsistent decision making, confusion and uncertainty for applicants, duplication in process and often delays in finalising decisions and potentially unnecessary biodiversity loss.

The Report identifies that South Australia is behind other jurisdictions in that it does not currently afford tree protections based on the height or crown spread of a tree. It is indicated that protecting taller trees and trees with larger crowns would ensure canopy structure is preserved, and would maximise biodiversity, amenity and public health benefits associated with the urban forest. We would also note there is also a benefit to the private sector, government and the economy to maintain these trees.

We support the need to investigate a wider range of appropriate indigenous and non-indigenous species, which are climate adapted and resilient to disease and have sound tree form is an opportunity. If we continue to use the same species, the urban canopy will be very vulnerable to the current and future stresses created by a changing climate and environmental factors, including biosecurity concerns. We need to consider trees for both their high biodiversity value, low health impact (Asthma and Allergy's), canopy cover and climate resilience so they survive and grow well. In the future the trees that survive in South Australia's changing climate that meet these requirements may not be recognised as endemic South Australian species now but be species from other regions of Australia or indeed the globe.

Working together the horticultural, nursery and arboriculture industry, together with government, there is the opportunity to explore increased biodiversity, improved canopy stock, and then funding options for tree planting and maintenance, as a manner to encourage the planting of more substantial trees that will make a significant impact on the future urban tree canopy.

We must always remember trees are living entities and are constantly changing and viewed differently by different parties. The Planning and Design code needs to place much greater value on trees and biodiversity generally, in both the public and private realm, if South Australia is to be future aware and plan to thrive and grow through the changing climate scenarios and the social and economic conditions predicted.