

From: Meredith Harrison

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To the Expert Review Panel,
Via email: DTI.PlanningReview@sa.gov.au

Dear Panel Members,

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

My key concerns relate to the loss of tree canopy, particularly in relation to:

- a) the removal of significant native trees in rural settings and
- b) the removal of regulated native trees in urban settings and
- c) the proposed development of Kings Reserve in Torrensville for commercial purposes

The reason for my submission is my concern regarding the ongoing loss of tree canopy state and city wide and the inadequacy of current legislation to halt this.

My examples are specific to the areas where I live and work and typical of current trends. They highlight the importance of retaining mature trees for mitigating climate change impacts and to address the increasing recognition of the value placed on large trees by the community in the face of increasing residential density, stresses on health and wellbeing and environmental stresses.

As each significant tree or stand of trees is removed our environment is further impoverished.

It is important that the rapid reduction of tree canopy in Adelaide is halted immediately as the damage done with each large tree removal is irreversible.

a) As an example of the removal of significant native trees in rural areas

Earlier in 2022 a large number of mature eucalypts were destroyed where the Victor Harbor Road is currently being widened, just past the Main South Road turn off.

My concern is that DIT are able to remove such trees, which in ordinary circumstances would be regulated, without approvals being required.

Sandwiched between land that has previously been cleared for agriculture and housing subdivisions and the main road, the demolished trees were one of the few substantial stand of trees along that stretch of road.

The trees were not only a beautiful and important cultural marker on my twice weekly trips between the Fleurieu Peninsula and Adelaide, but also home to birds and wildlife. The loss of these trees is heartbreaking. Valuable habitat has been lost. These trees are irreplaceable in my

lifetime, and I suspect, that of the next couple of generations. I would like to see legislation in place to protect significant roadside trees before more of the few remaining are lost.

b. As an example of the removal of significant native trees in urban areas

I have recently observed the removal of a very large eucalypt in a suburban block at 54 Albert Street Goodwood in what is a common occurrence in Adelaide suburbs. The tree was located at the rear of a property with a house towards the front of the property. This house has been unoccupied for many years and has been allowed to fall into disrepair.

Removal of this tree was based on arborists advice counter to its regulated status. My understanding is that more than one arborist report was sought prior to an arborist recommending its removal. The Unley Council will have further correspondence relating to this tree and the battle between those wishing to have it removed and those querying the need and identifying arguments for its retention.

This has had a detrimental impact on the adjacent properties, through loss of urban tree canopy resulting in loss of shade and windbreak, loss of visual and aural amenity/ wellbeing and connection with nature, loss of bird and insect life visiting the property and adjacent properties and loss of air cleaning.

The aerial photos below show the 'before' view with the canopy indicated in red - tree 1 has been removed during November 2022. Removal of tree 2 has commenced – my understanding is that approval for it's removal has been given counter to its regulated status.



c. the proposed development of Kings Reserve in Torrensville for commercial purposes

This proposed development site is in an area of low canopy cover (the West Torrens City Council).

Planning and negotiations to undertake the proposed development are well underway.

The real risk of losing a large proportion of the 150 + mature eucalypts (approximately 30 years old and over) on the wider site will have a major detrimental impact on my local area and my opportunity to enjoy the benefits of our only sizable park with numerous mature trees.

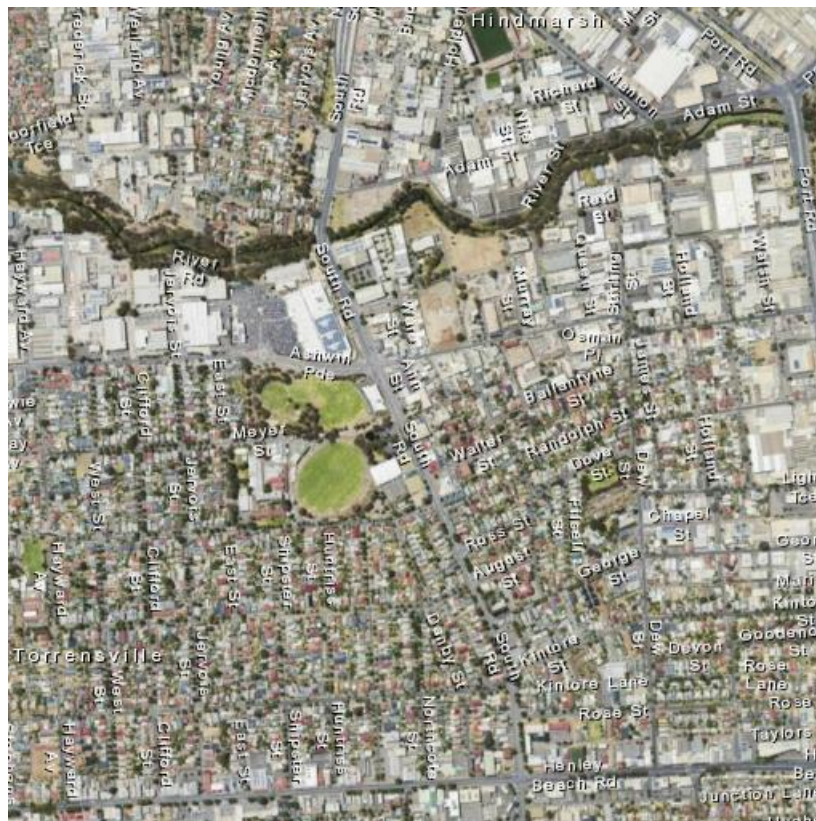
The images below show:

1. the site in its broader context
2. a detail covering the proposed lease site
3. an artist's impression of the proposed redevelopment (still in planning stages) and
4. diagrams translating the proposal to site an MCG sized oval over the Kings Reserve as well as other structures proposed by the developer (Adelaide Football Club)

It has been stated that the council will require the replacement of any trees removed. Saplings and young trees can not replace the lost habitat, shading properties or beauty and will require decades to re-establish.

Research has shown that a 150-year-old tree requires a replanting of 891 1m high saplings to provide the equivalent removal of climate-warming carbon dioxide from the atmosphere.

In addition, trees have a collective value as habitat and for human health and wellbeing and where they exist in tree communities, they form supportive networks.



1. the site in its broader context

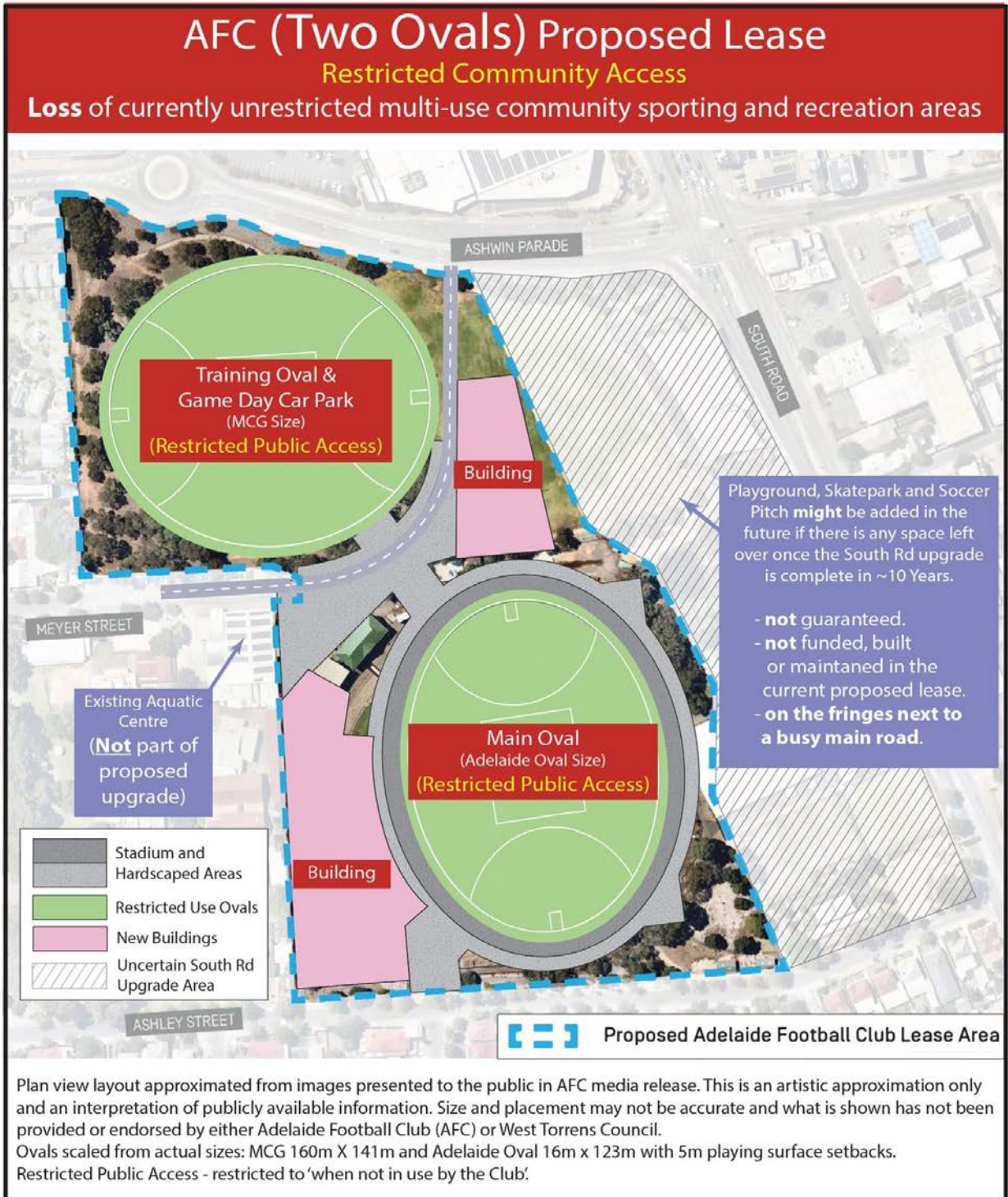


2. a detail covering the proposed lease site



3. an artist's impression of the proposed redevelopment (still in planning stages) noting buildings and identifying Thebarton oval with additional seating (red) . bridge and buildings and MCG sized oval located on Kings Reserve (Perspective view makes it look smaller – refer plans below). Trees in bottom right corner are notional – this area is subject of North South corridor planning which has not been finalised to date

What is proposed?



4. diagram translating the proposal to site an MCG sized oval over the Kings Reserve as well as other structures, proposed by the developer (Adelaide Football Club)

Reference to the images above clearly demonstrate the potential devastating loss of urban tree canopy at Kings Reserve in Torrensville subject to negotiations between the West Torrens Council and the Adelaide Football Club.

Considering the scientifically measured positive impact of mature trees in mitigating the impacts of climate change by cleansing air, cooling the environment and providing habitat, and also in benefitting physical and mental health, I urge the Expert Review Panel to recommend tighter legislative controls on the removal of mature trees.

I would like an immediate interim halt to the removal of regulated trees until the review is complete.

For all the above reasons, I ask you to support the following key priorities

- Bring South Australia into line with Victoria and NSW by changing the definition of a regulated tree to one that has a trunk circumference of 50cm or more measured at 1m above ground level or has a height of 6metres or more or has a canopy of over 9m²
- Remove the ability to prune up to 30% of a regulated tree without requiring council approval and utilise a system requiring adherence with AS 4373
- Restore the requirement for DIT and DfE to publicly consult and gain planning approval to remove regulated trees
- Modify the Tree Canopy Offset scheme to require payment of a fee to match the cost to councils to plant, establish and maintain replacement trees
- Increase the number of trees to be planted
- Require that trees be retained until all relevant development approvals for a site are granted
- To recognise the collective value of trees by introducing measures to protect a group of trees where individual trees fall short of regulated tree metrics, including retention of greenspaces in urban areas that are of sufficient size to support tree communities

I look forward to the panel making recommendations that **at least** match interstate best practice.

Allowing councils a greater say over which trees are protected above minimum standards, and in which circumstances, would allow this and would also meet community expectations for their local area.

Yours sincerely,

Meredith Harrison