

From:
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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 our concerns re our new Planning and Design Code.

Our key concerns are:

1. The loss of established mature trees, and the animals that depend on them, due to residential and commercial development in urban and especially peri-urban areas in SA. For example, the loss of habitat which has contributed to declining native species in the Adelaide Hills region, for example the well documented decline of bird numbers.
<https://www.abc.net.au/news/2021-03-23/woodland-birds-declining-by-45-per-cent-in-mt-lofty-ranges/100021980>
2. On residential allotments, the lack of redress with regards to planting back local endemic plant species as reparation for the removal of any mature endemic plant species as part of any development.
3. The financial cost of particularly mature endemic tree species removal isn't sufficient to have a commercial or residential developer think twice about their removal, rather than changing the design to incorporate/work around existing endemic mature trees.
4. A lack awareness by commercial or residential developers of the local ecology, ecosystem services and resident wellbeing that endemic mature trees provide. An awareness is why other residents may have chosen to live in that area.
5. Loss of the increasingly important protection from heat in streets and gardens, provided by shade from established mature trees.

We are keen to see the above concerns addressed for the following reasons:

Why: As residents of the Adelaide Hills, we chose to live in the area because of the high prevalence of remnant ecology, most notably manifest as mature endemic Eucalypt trees. Along with the uplifted topology the mature endemic trees, in our eyes are the defining characteristic of where we live. They provide a sense of place and wellbeing to us as residents, particularly because they provide habitat for a wealth of local endemic species, both plants and animals. These include birds, possum species, bats, Koalas, reptiles, insects (e.g., native bees, butterflies, and spiders), as well as a diverse selection of endemic understory species, wattles, native pines, lilies, pea species, daisies, sedges, and orchids.

In addition, there is ample scientific evidence to show that tree canopy is one of the best ways to mitigate against urban heat island effect. Given the climate crisis we are currently facing, we need to move swiftly to ensure that we leave the best possible outcomes for our children and grandchildren. This would specifically include protecting any mature trees, as they are effective protection against urban heat, and because they embody large amounts of carbon.

Specific examples of tree loss in our immediate area:

1. 21 Glen Rd, Eden Hills, ~2007- Loss of several mature SA Blue Gum trees (*Eucalyptus leucoxylon*) from rear yard.
2. 8 Mary St., Eden Hills, 2022- For new residential development. owner occupier, the loss of several mature SA Blue Gum trees from rear yard. This resulted in a loss of habitat of resident Possum species, which was possibly the reason for over grazing of Grey Box trees (*Euc. microcarpa*) in the adjoining property 10 Grove St.
3. 6 Mary St., Eden Hills, 2022- Rental property, the loss of multiple mature SA Blue Gum trees from side of property.
4. 13 Mary St., Eden Hills, ~2014- For new residential development. owner occupier, the loss of all mature Grey Box trees and Blue Gum trees from entire property.
5. 6 Dale Rd., Eden Hills, ~2008 – Loss of very large Grey Box tree from front of property.
6. 17 Viaduct Rd., Eden Hills., ~2012- For new residential development. owner occupier, the loss of all mature Grey Box trees and Blue Gum trees from entire property.
7. 15 Viaduct Rd., Eden Hills., ~2012- For new residential development. owner occupier, the loss of most mature Grey Box trees and Blue Gum trees from entire property.
8. 5 Lee St., Eden Hills., 2022- For new residential development, the loss of very large multi trunk Grey Box tree.
9. 8 Viaduct Rd., Eden Hills., ~2017- For new residential development, double allotment, loss of very large single trunk Grey Box tree.

Specific example of eco-sensitive design in our area:

1. 18 Mountain Rd., Eden Hills, 2022/23 – Retention of many existing mature Grey Box trees.

Historical Perspective of Development in our area:

The fact that all the above developments were/are on allotments that had original dwellings (that were removed) and mature endemic Eucalyptus trees, points to the original dwellings being built while allowing existing mature trees to be retained. This is most likely the case because the mature trees that were lost were many decades old. This suggests that previous development regulations required the retention of mature trees where possible.

For above reasons that aim to protect our endemic biodiversity, we ask you to support the following:

The 10 recommendations for SA Law Reform of Urban/ Native Vegetation as put forward by the Conservation Council SA.

https://www.conservation.sa.gov.au/top_10_urban_tree_law_reform_priorities

These are well considered and researched priorities. The two reports (at the webpage below) bench marking SA's Tree Protection Laws against interstate jurisdictions, demonstrate the comparative paucity of SA's laws and a clear case for improvement.

https://www.conservation.sa.gov.au/tree_resources

We look forward to the panel making recommendations that match or exceed interstate best practice. Allowing councils greater say over which trees are protected and in which circumstances would better meet community expectations for their local area.

Thank you for the opportunity to be able to make a submission and we congratulate the Government on conducting this timely review. We welcome the opportunity this review affords our parliamentarians to pass informed and well considered and improved planning laws with regards to protecting the State's biodiversity, in particular mature endemic trees.

Your sincerely,

Grant, Gaynor, and Acacia