



Mt Barker & District Residents' Association Inc.

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For the Community

24 February 2023

The Parliamentary Officer
Environment, Resources and Development Committee
GPO Box 572,
Adelaide SA 5001
Via email: erdc.assembly@parliament.sa.gov.au

To the Presiding Member

RE: Response to the Environment, Resources and Development Committee (ERDC) Inquiry into the Urban Forest.

The Mt Barker & District Residents' Association (MBDRA) appreciates the opportunity to provide feedback to the Environment, Resources and Development Committee (ERDC) Inquiry into the Urban Forest.

We appreciate the opportunity to present to you the key points which we believe will be beneficial in improving our urban forest.

These are:

- Tree species selection with a focus on trees for urban infill developments
- Best practice and innovative ways to preserve and improve the tree canopy
- Proposed changes to Legislation

We are willing to make a representation to the Inquiry.

Kind regards

Douglas McCarty

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Chairperson

Introduction

In 2010 the State Government rezoned 1300ha of land for housing (1100ha) and employment (200ha) in the Mt Barker district, largely in Mt Barker but also in Nairne and Littlehampton. Since that time, due to the massive housing developments across swathes of prime land and native vegetation, the loss of biodiversity and landscape amenity has been indisputable. Thousands of trees and native vegetation species have been destroyed to make way for housing development, roads, roundabouts, footpaths and some shops. In 2010, Mount Barker District Council was reduced to a mere 3% of remaining remnant vegetation, and this was prior to commencement of building in the Ministerial DPA rezoned area.

Many of the new houses are built on very small blocks and occupy most of the area, allowing for very little green space. There are associated issues related to increased temperature, storm water run-off and drainage. Many new houses are without solar panels or rainwater tanks, and dark, heat absorbing roofs overwhelmingly predominate. During site preparation topsoil is removed and sold to landscape companies leaving clay and concrete, resulting in a total loss of biodiversity. This is in direct contradiction of the high aspirations and goals of “Green Adelaide” and the State Government’s claims to be protecting and conserving ‘biodiversity’. Much of the new development in Mount Barker has minimal set back front or rear of the allotment, with no space for even a bush, let alone a tree, to provide some shade.

As the Mt Barker district is generally former farmland, there is already very little remnant vegetation left, thus it is even more noticeable when vegetation is removed. With only a few honourable exceptions, developers are not inclined to incorporate remnant vegetation into the design of new residential estates. They prefer a clear-fell site as they believe it is easier to work with and allows them to build more houses, usually very close together with little room left for new plantings. They then pay into the offset scheme rather than plant replacement trees. This means that some developments end up with very few trees, with aerial photos revealing a high intensity ‘sea of roofs’ resulting in suburbs experiencing higher temperatures and creation of an ‘urban heat sink’ which impacts a much greater area. Funds paid into the SEB (Significant Environmental Biodiversity) Offset Scheme do not guarantee that any trees or revegetation will be replanted in the same area or even in the same town where trees were destroyed to make way for development or roads. This is a direct impact on wildlife and biodiversity in general.

Trees are not valued by developers as a community asset or for the role they play in combating rising temperatures and climate change through the benefits of canopy cover and eco-services by acting as giant ‘air conditioners’. Current practice is to clear backyards of large trees/vegetation before selling properties or before submitting development applications. This is myopic thinking as it only increases the need for AC heating in summer, when previously the tree canopy provided valued cooling.

The most common species found in backyards in the more established parts of Mt Barker are currently exempt from protection. In addition, there are many small creeks and tributaries throughout these areas which are either adjacent to or run through some of these properties. The total removal of adjacent vegetation then impacts on the health of those creeks by the accumulation of silt and sand which washes into them from nearby development areas. In some developments winter creeks have been turned into mere drains with geo-text bags and cement so

that they no longer support frogs and other wildlife and former dams have been bulldozed and built over, regardless of whether they were 'spring fed'.

1. Tree species selection with a focus on trees for urban infill developments

1.1. Plant climate suited plants

According to [The State of the Environment Report](#), produced by the Environment Protection Authority (EPA) we can expect global warming of at least 2 °C—possibly 4 °C by 2070. Such a climatic shift will mean that many native and exotic plants may no longer be able to survive. As such we need to change our attention to selecting plants that are more suited for semi-arid environments. Urgent action is also needed to slow the impact and make every effort to preserve and protect the iconic landscapes and eco-systems for which Australia is famed and which foster a very valuable tourism industry for the State.

1.2. Avoid planting a monoculture

Reliance on one species increases the chance of disease and pest infestation whereby the whole species can be wiped out. For example, elm trees are susceptible to elm leaf beetle infestation and without ongoing costly treatment will eventually die. We strongly advise against planting a monoculture.

1.3. Increase the range of species planted

By increasing the range of species planted, this will provide diversity of habitat and strengthen the resilience of all species by other plant and animal species limiting the spread of disease and control pests through predation.

1.4. Review the list of species classed as weeds

This is to accommodate those plants that are being used as a food source where no alternative exists. One such example is the declaration by State Government Department of Environment of the Aleppo Pine as a noxious weed and its removal, even where it existed in a natural valley at Flinders University and had not exhibited any tendency to self-seed outside that area. This small pine forest was the seasonal food source for some 300 Yellow Tailed Black Cockatoos each fruiting season – a food source which was not replaced on site or even in the same district. These iconic large birds are now mostly dependent on non-native pines, since their native banksia and hakea food sources are being largely cleared. There are many other examples of diminishing native bird species as reported by Birds SA due to loss of habitat and local food sources.

1.5. Review the list of species which SA Water and SAPN exclude from planting near infrastructure

We recommend that the list of species which SA Water and SAPN exclude from planting near infrastructure be reviewed and improved. This list currently limits what can be planted, the impact of which is a monoculture which does not support sustainable biodiversity.

2. Best practice and innovative ways to preserve and improve the tree canopy

Unnecessary removal of trees is at odds with the State Governments 30-Year Plan aspirations to achieve a 30% canopy cover. Given the volume of traffic through urban areas it is undeniable the

value trees play in offsetting carbon emissions. There appears to be a mis-match between Government high level strategic plans and aspirational goals regarding climate change and protection of biodiversity and Departmental regulations which neither protect trees or set appropriate targets for action to mitigate climate change.

2.1 The importance of canopy and habitat

Though some trees are not ‘protected’ under the definition of significant and regulated, trees in total provide a valuable canopy that add environmental and aesthetic value to an area. The value of the canopy can clearly be seen in any aerial photos of urban areas.

There is a clear need to retain trees, to provide shade in a warming climate and in the mitigation of ‘heat islands’. This not only applies to indigenous, native, and significant trees, but ones that are not protected but still perform this function, including deciduous trees.

While we should have a principal structure of indigenous trees, exotics should be considered in the mix. Urban areas are not bushland, but more a kind of Botanic Garden. Exotics can bring a particular use value of very dense shade in summer and, in the case of deciduous species, more sunlight penetration in winter.

Further, a range of vegetation provides food and habitat to native birds and animals, especially dense, thorny understorey species for the smaller wrens, honeyeaters and other bush birds. Sometimes it is only the introduced species of vegetation that provide food. For example, in some areas the black cockatoo relies on the Aleppo pine and other non-native pines and small foraging understorey birds rely on blackberry bushes. Removing these all at once will remove a significant food source and refuge habitat. A managed, staged approach of removal needs to occur alongside revegetation to allow time for animals to locate other food sources. Small native birds have very small territories and large birds must often fly great distances to find food for their young, placing pressure on both adults and young.

It should also be noted that bituminized car parks are unattractive at the best of times and unless suitably mitigated by a considerable amount of tree canopy for shading they become “heat islands”. This has a measurably negative impact on the immediate area and does nothing to improve the aesthetics of any development.

2.2 Innovations

2.2.1 Tree canopy, especially large trees on private property should be valued as a community asset by supporting tree owners to retain and maintain them through financial support. Where this is not possible, iconic centuries old trees need to be protected through a Heritage Agreement and held in a Council road reserve rather than finding themselves in certain peril on a small allotment where clearly neither tree nor residential house can co-exist in harmony (e.g. Wiland Street, Mount Barker where two pre-European settlement Mount Barker Blue Gums are each on a residential allotment at the end of the street).

2.2.2 Incorporate a water collecting mechanism to collect water runoff from homes to water street trees (such as the Treenet inlets which have been shown to reduce storm water run-off,

capture water and direct to street trees and encourage deeper root development which reduces damage to footpaths and kerbing).

2.2.3 Provide support to residents to plant on verges.

2.2.4 Support active transport and change the culture of reliance on cars, thus reducing the need to continually engage in road construction projects. Often tree/canopy loss occurs alongside roads (verges) due to road widening activities.

There is evidence of a change in thinking in this area:

A. Refer to article in Indaily 9 Feb 2023

<https://indaily.com.au/news/2023/02/09/regional-rail-on-the-agenda-but-on-demand-buses-look-more-likely/>

This article includes the following statement from the Minister for Transport, Tom Koutsantonis

"We are now compelling the Department to integrate active transport throughout all their designs as well as canopy, trees, heat sinks. (We're) no longer interested in the engineers just working on – how does this road infrastructure benefit cars and traffic? There's got to be an integration of pedestrian access, cycling and connectivity."

B. Refer to article in BBC News, All major road building projects in Wales are scrapped - BBC News

<https://www.bbc.com/news/uk-wales-64640215>

"The Welsh government will not consider new projects unless they reduce carbon emissions and support a shift to public transport, walking and cycling, improve safety through small-scale change and help the Welsh government adapt to the effects of climate change.

They must also provide connections to jobs and areas of economic activity in a way that maximises the use of public transport, walking and cycling."

2.2.5 Strengthen the requirement for developers to demonstrate that all reasonable alternative development and design solutions have been considered to prevent tree removal. Developers to be encouraged/incentivised to retain existing trees as part of any development.

3. Proposed changes to Legislation

3.1 Amend the definition of 'Regulated Trees'

Amend the definition of 'regulated trees' to ensure trees with a smaller circumference, height and/or which provide a reasonable canopy are protected. Under the Significant and Regulated Tree legislation of 2011, no tree in South Australia can be protected. With Significant Trees mandated a trunk circumference of 3m at 1m height from ground level and Regulated Trees a circumference of 2m, how can a 400 year old, or even a 1,000 year old South Australian native Mallee be protected with a multi trunk system, each trunk measuring in circumference less than a

human thigh? Interstate trees with a 50cm circumference are protected, thus preventing any wholesale clearing of land. Councils no longer have any control over trees, planning or development under the State Planning Code, which is a “one size fits all” Code, replacing 68 Council Development Plans (and 4 additional Special Area Plans) and it simply does not work other than in the sense that all council areas will soon be reduced to treeless landscapes all much resembling one another, without the unique character and form once held dear by those respective councils. Heritage protection has suffered in much the same way, ensuring the ‘one size fits all’ plan will indeed result in a landscape ‘by design’ to be the same State wide.

3.2 Include more tree species on the protected list

Including more tree species on the protection list is vital in order to protect those trees more commonly growing in private backyards.

3.3 Increase number and size of trees in new housing developments

It is vital to increase the number and size of trees to be planted in new housing developments to ensure future canopy growth is prepared now, as these gutter-to-gutter houses will create significant rising temperatures in the future.

3.4 Increase the offset scheme fees

Increase the offset scheme fees in order to assist Council in managing the consequence of having to replant and maintain replacement trees. Ensure that all ‘offset trees’ are planted in the same local area where the tree/vegetation loss occurred to ensure minimal biodiversity loss in accordance with an overall wildlife food and habitat structure plan.

3.5 Remove exemptions

Remove the exemptions which currently allows trees within 10 and 20 metres of a dwelling to be felled, and within 5 and 10 metres from fences as part of the Native Vegetation Regulations.

3.6 Improve Council’s ability to prosecute

Improve Local Councils’ ability to fine or prosecute those people who wilfully damage trees. There are numerous examples of tree loss adjacent housing developments in Mount Barker (e.g. Barker Road, Sims Road, Martin’s Road) and on land prior to development, where the meagre fine is a joke compared with the additional allotments achieved by maximising tree removal.

3.7 Add vegetation overlays

Ensure additional Vegetation Overlays are allowed, like those in Victoria, to better reflect the expectations of local communities by allowing for the protection of significant urban vegetation.

3.8 Strengthen rules for verges

It is essential to strengthen the rules to protect native vegetation alongside road verges, fence lines and in private properties.

3.9 Plan for replacement

As a Native Vegetation Survey is required as part of the development plan, significant data will exist regarding what will be lost. It is therefore possible to devise a replacement program for the lost native vegetation that ‘cannot be retained’. At the Development Application stage, a specific project be undertaken, jointly determined by the developer’s Environment Consultants, Local Council and Landscape SA, that enhances and advances the overall planning for wildlife and native

vegetation along creekside/riparian reserves and/or wildlife corridors throughout the region. So far there is no plan for where displaced wildlife/biodiversity might be accommodated when major land clearing is approved. Survival of most small species is therefore unlikely.

3.10 Ensure the DIT applies for planning permission

It is ludicrous that the Department of Infrastructure and Transport (DIT) does not require any approvals to remove any trees for its developments. This is grossly unjust. We strongly believe that the DIT must be required to gain planning approval to remove trees and engage in meaningful consultation with Council and the community prior to the removal of any trees.

Recently in the Mount Barker District Council area hundreds of trees have been removed both for road widening (Wellington Road) adjacent developments and new roads and between Wistow and Strathalbyn on Long Valley Road by virtue of 'Black Spot Funding' on grounds of road safety. Yet the records show that the majority of fatal collisions on this section of road have been head-on collisions, with no trees involved, but a vehicle being on the wrong side or in the middle of the road. Why then have so many mature native eucalypts been removed without due cause? Will trees of the same type be planted locally, and where? Wildlife must wait a century or more for the habitat which has been lost.

Thank for this opportunity to present our submission to you.

We would be pleased to speak to our submission if this is permitted.