



Australian Institute of
Landscape Architects

9 February 2021

The Hon. Vicki Chapman MP
Minister for Local Government and Planning
Parliament House
Adelaide SA 5000

Planning and Design Code Phase 3 and proposed Tree Offset Scheme

Dear Minister,

I attended the Stakeholder Forum (the Forum) on 29 January 2021 regarding Urban Tree Canopy Off-set Scheme and other changes proposed to the Code.

The Australian Institute of Landscape Architects (AILA) South Australian Chapter thanks the Department for Local Government and Planning and the State Planning Commission (the Commission) for the opportunity to comment on the revisions to Phase 3 of the draft Planning and Design Code (the Code) for South Australia.

We thank the Commission and the Department for the collaborative process to date and we will continue to work closely on this important series of reforms to South Australia's planning system.

I am writing to you to express our serious concerns regarding the treatment and requirement for trees on private property in the Code and would request further independent review of the basis of the proposal (including the new Urban Tree Off-set Scheme).

Despite assurances from staff and the Commission at the Forum that the new measures will incentivise tree planting on private allotments, we disagree and can not understand how this will achieve increased private greening, let alone incentivise it.

Based on the presentation at the Forum, the Scheme appears voluntary from the option not to plant trees to making a contribution to the Scheme, viz: *'the Scheme will not require or mandate payment into the Fund, but an applicant may elect to pay into the Scheme in lieu of planting a tree as required in the Urban Tree Canopy Overlay'*.

The presentation then outlines the payment levels. These are extraordinarily low and do not represent the true cost and value trees provide.

We have analysed the report commissioned by the Commission titled *'Costs and Benefits of Urban Tree Canopy Options for Minor Infill Development in the Planning and Design Code'* (the Report) and many of our members have contacted us with concerns.

Australian Institute of Landscape Architects
South Australian Chapter

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Firstly, the Report does not include a monetised value that trees have in improving amenity, health and biodiversity in the \$26.4m benefit cost ratio, as the report claimed these things could not be quantified and put in 'dollar' terms, viz:

'The 'One Tree Policy' proposed in the new Planning and Design Code is expected to deliver economic, amenity and liveability gains to the Greater Adelaide community valued at \$26.4 million (Benefit Cost Ratio 1.7), and is therefore a worthwhile initiative for government to consider.'

Monetary costs and benefits considered include those that are direct (e.g. paying an offset) and those that are indirect (e.g. electricity bill savings). Non-monetary costs and benefits were also considered (e.g. avoided healthcare costs from reduced air pollution).

Some well-researched benefits that could not be defensibly quantified have therefore been excluded. These include amenity values of onsite trees, biodiversity values, urban heat mitigation, and some physical and mental health benefits.'

There are many other parts of Australia that use informed research on the value of trees – for example the City of Melbourne's *Tree Retention and Removal Policy 2012* (www.melbourne.vic.gov.au/community/greening-the-city/tree-protection-management/Pages/tree-protection-policy.aspx).

This is a working example that covers the '*...well-researched benefits that could not be defensibly quantified*' as outlined in the Commission's Report.

Section 8.3 of the Policy ('Bonds and Payments') outlines four cost components to be calculated where a tree is to be removed, viz:

A - Removal Costs: amounting to the fees incurred by Council for physically removing the tree.

B – Amenity Value: calculated in accordance with Council's Amenity Formula.

C – Ecological Services Value: calculated in accordance with the i-Tree valuation tool.

D – Reinstatement Greening Costs: calculated in accordance with the greening required to replace the loss to the landscape incurred by the removal. The level of reinstatement greening required will be determined by Council and will take into consideration the location, the significance, the biodiversity provision and the amenity of the tree. Reinstatement greening costs will also include a 24-month maintenance fee and any treatment or Water Sensitive Urban Design (WSUD) measure deemed to be required to establish replacement growth.

On this basis, it is clear further detailed and relevant research is required to improve the basis for any future costs to remove trees from private and public land to include all benefits that were outlined in the Commission's own Report as '*well-researched benefits that could not be defensibly quantified*'.

We request that the Commission and the Department confirm the voluntary nature of the scheme and undertake further work to address the shortcomings of the Report above.

AILA would be willing to assist, facilitate and provide expert and leading advice on this important valuation exercise. AILA is a partner to the State Government's *Healthy Parks Healthy People South Australia* initiative, for the *Quality Green Open Space Plan*, specifically action 5c which is to '*continue to build evidence on the economic value of trees*'.

AILA recognises that the planning system is not the panacea for solving climate change, and not the only path in enhancing and expanding Adelaide's urban tree canopy. It has a role to create stronger awareness and codification of many aspects, many which we support.

However, there is need to consider complementary actions and incentives inside and outside the Code to achieve the public and private greening of Adelaide. The onus should be on the Code to incentivise private tree planting for the all the benefits we have previously outlined.

It is important to note that local governments carry the burden of meeting tree canopy cover targets, and most metropolitan councils are doing everything they can to meet and exceed the targets set out in South Australia's Strategic Plan of 20% tree canopy cover.

The Commission's work in assessing the costs and values in the Code has been on the costs of increased footings to plant trees, which appears to have formed the basis for the *Urban Tree Off-set Scheme*.

The risk is we will be back to the old scheme – the current planning system – with no incentives to provide small, medium and large trees on private properties, no incentives to foster a culture of change within the development industry, and no incentive to reshape the way we inhabit our housing to afford indoor and outdoor spaces.

AILA's members are leading design based professionals who work with all matter of professionals from planners, to Structural engineers, to councils and developers. Often we are at the forefront of solutions to tricky site-based problems using best practice, site observations, local context and an understanding of Adelaide's landscape.

A better planning system with incentives for making a better Adelaide is not in question: the mechanisms, however, need to work as hard as they can to stimulate better places for all of us.

We thank you once again for the opportunity to provide constructive feedback and for your engagement during the process and look forward to continuing our constructive and working relationship with the Commission and the Department.

If there are any aspects of our feedback, recommendations and commentary that require clarification or further discussion please do not hesitate to contact me.

Yours sincerely,



Daniel Bennett
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Fellow, AILA