

29 November 2019

Submission to Draft Planning and Design Code – Phase 2
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To whom it may concern

Thank you for the opportunity to provide comment on Phase 2 of the Draft Planning and Design Code for South Australia.

Trees For Life is a community-based conservation organisation that works to protect and restore native vegetation, raise awareness about nature and empower people to take action for the South Australian landscapes we all love. We have a supporter base of 7000 members including 2000 active and passionate volunteers. We work across South Australia to support private and public landholders to protect existing biodiversity and establish revegetation to provide biodiversity, productivity and wellbeing benefits.

Our primary concern in relation to the planning system in South Australia is to ensure strong protection for biodiversity and native vegetation and ensure individuals, natural systems and industry is able to be as resilient as possible in the face of current and emerging climate change impacts. Healthy and abundant green infrastructure will underpin the capacity of all systems to adapt to climate change.

South Australia is still losing significant amounts of native vegetation, despite the controls in place. We are pleased to see greater alignment between Native vegetation and the Development Act proposed through the Planning Reforms. However we believe the Code needs to be strengthened to ensure appropriate protection and enhancement of critical biodiversity in South Australia.

The recent State of the Environment Report found that over 10% of South Australian native plants and animals are threatened, with the trend getting worse. The report concluded that habitat loss via vegetation clearance, mostly for agricultural expansion, is the most important cause of native vegetation decline and species extinctions.

Accordingly, planning policies, overlays and zones need to be underpinned by a strong commitment to biodiversity protection, including retaining and expanding critical habitat for threatened species as well as the protection and enhancement of climate refugia.

Policy statements must recognise the economic, environmental and social value of trees and biodiversity in general. We are particularly concerned about the impact of cumulative clearance in rural areas and rural townships and urge the Department to incorporate a mechanism to account for cumulative impacts – potentially through a Cumulative Assessment overlay.

In relation to urban trees, we commend an increased emphasis on improving treetop canopy to mitigate against heat island effect increasing as a result of climate change impacts. Tree canopy on private land is essential if we are to achieve desired canopy targets. However the proposed system is lacking appropriate controls to ensure that development does not impact this in the longer term. Even with a commitment to replace a mature tree that is removed, the impacts from this loss are felt immediately as the replacement will take decades to provide the same benefits, thereby reducing quality of life for those in the local area as well as the impacts on the biodiversity of the area. We support the recommendations made by the Environmental Defenders Officer in relation to the regulated tree overlay policy; namely:

- reference for regulated trees in general to indigenous to the local area and important habitat for native fauna being criteria for considering retention
- reference for significant trees to indigenous to the local area, important habitat for native fauna, part of a wildlife corridor and importance to maintenance of biodiversity being criteria for considering retention
- retention test be amended to “Significant Trees should be preserved” rather than “where they make an important visual contribution to local character and amenity”
- test for significant trees of “all other remedial treatments and measures have been determined to be ineffective”

The new Planning and Design Code is an extraordinarily complex and important document and we share the concerns of other conservation groups, including Conservation Council of SA and National Trust SA, about the unrealistic time-frame for completing the full implementation of the Code. We urge the Government to push back the timeline to ensure there is adequate time for consultation and to ensure the Code defines and applies best practice in relation to the crucial areas of biodiversity and climate change resilience. The risks from getting this wrong not only impact the current generation of South Australians, our decisions today will have a profound effect on the quality of life, health and sustainability of future generations.

I thank you again for the opportunity to comment.

It would like further information about our submission, please contact me on

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Yours sincerely



Natasha Davis
Chief Executive Officer

