

From: [Joanna Wells](#)
To: [DPTI:Planning Reform Submissions](#)
Cc: [Waite EO](#)
Subject: Submission on Phase 2 of the Code
Date: Thursday, 28 November 2019 5:04:49 PM

I'm writing as I have spent quite a deal of time trying to work my way through the draft of the proposed code. The relevant mapping and overlays in Conservation Zone are not easily accessed and I find the on line version of the draft Code to be confusing and difficult to understand.

In addition, there are significant omissions and mistakes noted in the overlay maps and zone.

The Significant and Regulated tree overlay for the whole state needs to be accurate and incorporated into Biodiversity and Climate Change policies

I support that a revised, clearer and accurate version of the Code be peer reviewed and accessible to the public for comment before being 'activated'.

The Conservation Zone should not have merit assessed for alternative energy facilities – this use apart from where physically contemplated in a park management plan should be restricted. It currently is identified as a suitable development in the Conservation Zone, but not in the Significant Landscape Character overlay.

I recommend that:

you align the Significant and Regulated tree provisions as part of biodiversity.

that planning for all rural zones includes considerations of Biodiversity.

that development application process should clearly state that contact occurs first with the Native Vegetation Council and that the development proposal is lodged afterwards, rather than people putting together applications, only to find that their application is unacceptable to NVC.

NVC advise to advocate designing with a view to retention of vegetation, not removal of vegetation before designing.

Offsets for NV removal; NB that revegetation does not substitute for mature tree replacement. Mallee trees for example which take 100s of years to grow – how should these be valued re hydrological aspects? Where they have been ripped out we now have majority salinity problems.

Greybox Gum trees are an endangered species – should be included as a tree worthy of retention. I have an old grey box bluegum on my suburban block and I know that despite its age it will never achieve significant or regulated tree status simply because of how it grows. This is ironic as it is part of the remnant bushland that was here before subdivision after World War II. I actually believe that the criteria for significant or regulated trees

should apply to all trees, regardless of whether they are native or exotic.

Furthermore, I Support more accurate valuations on mature trees. For example, Dr Jennifer Gardner of Waite Institute is involved in Waite Arboretum trees being valued on the basis of species, size, location, environmental benefits. Although only half way through the survey of existing trees in the Arboretum, the estimated value of mature trees to date is \$13,000,000. As all trees in the Arboretum have grown without watering, the use of these trees value for urban plantings provides a better range of species selection for the planting of an urban forest in the Greater Adelaide Area.

I would also like to draw the Commission's attention to the City of Melbourne <https://www.melbourne.vic.gov.au/SiteCollectionDocuments/Tree-valuations.DOC> for inspiration and suggest a review of draft Code refer to standards and valuations above.

In rural zoning areas, mandate for perimeter plantings of drought resistant trees in order to provides shelter for stock, lower ground temperatures and reduce erosion. When used these also provide habitat corridors for native wildlife.

I would recommend that the Commission review the methods used for demolition. Development sites are being cleared of buildings and all vegetation. Demolition firms charge more to work around trees if retention of trees is required. I suggest incentives for developers and demolishers to retain existing trees and other vegetation.

Finally larger trees should be required as part of the landscaping plan for any urban consolidation development of higher rise housing. It is not enough to take out mature trees and "replace" them with saplings planted elsewhere on public land.

Trees and the wellbeing of all citizens must be put ahead of the financial well-being of developers.

Yours sincerely,

Joanna Wells

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