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To: [DPTI:Planning Reform Submissions](#)
Cc: badcoe@parliament.sa.gov.au
Subject: Submission on Phase 2 of the Code
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To the State Planning Commission

RE: Submission on Phase 2 of the Code

There are significant mistakes in draft code and it does not match other governmental policies, in particular:

- The relevant mapping and overlays in Conservation Zone are not easily accessed and finding the on line version of the draft Code confusing and difficult to understand.
- 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

Hence 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'.

I recommend the following changes to the draft code:

1. 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.
2. Align the Significant and Regulated tree provisions as part of biodiversity.
3. Planning for all rural zones should include considerations of biodiversity.
4. All National Park and Wildlife National Parks, Conservation Parks, Recreation Parks, Heritage Agreements, ForestrySA Native Vegetation Reserves, Sanctuaries and other public land with native vegetation remain zoned as Conservation and not rezoned Rural.
5. Native Vegetation-Support lodgement of development application after contact with Native Vegetation Council (NVC). NVC advice to advocate designing with a view to retention, not removal before designing.
 - a. Offsets for NV removal; note 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?
 - b. Greybox Gum trees are an endangered species – should be included as a tree worthy of retention.

Additionally given the alarming loss of tree canopy across the urban SA and its negative impact on the urban heat island effect, biodiversity and water retention I support the following:

1. More accurate valuations on mature tree benefits. 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 the trees values for urban plantings

provide a better range of species selection for the planting of an urban forest in the Greater Adelaide Area. In this the City of Melbourne is leading the way for Australian cities (see <https://www.melbourne.vic.gov.au/SiteCollectionDocuments/Tree-valuations.DOC>). The draft code could use these standards and valuations.

2. In rural zonings, area, encouraging perimeter plantings of drought resistant trees provides shelter for stock, lowers ground temperatures and reduces erosion.
3. Review the methods used for demolition,. Development sites are being cleared of buildings and all vegetation and demolition firms charge more if retention of trees is required. Suggest incentives for developers and demolishers to retain and/or plant.
4. Larger trees, preferably native species, be required as part of the landscaping plan for any urban consolidation development of higher rise housing.

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