

From: [Jane Paterson](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: Draft Planning and Design Code Consultation - Submission on Phase 2 of the Code
Date: Friday, 29 November 2019 2:54:28 PM

To the State Planning Commission

RE: Submission on Phase 2 of the Code

Adelaide is getting hotter and drier and our suburbs are becoming more built up. In these times we need to be doing everything we can to cool and green our streets and suburbs. Urban tree-canopy loss, a major issue in our rapidly warming and drier climate, is not being solved by current rules and protections.

As more and more houses are being built on small blocks, closer together we need to retain and value as the existing trees . With urban uplift and density infill these trees are critical to cooling and greening our streets and suburbs. We need to recognise the value of retaining trees in the urban environment. Trees provide absolutely essential services for environmental and human health and wellbeing. An economic value assigned to mature and significant trees is recommended. Public space for tree planting is not sufficient to compensate arboreal loss from private property higher-density living.

Therefore, I support more accurate valuations on the benefits of 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 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.

- i Review the current methods used for demolition and development of sites that are being cleared of all vegetation. I suggest incentives for developers and demolishers to retain and/or plant trees. Trees must be required as part of the

landscaping plan for any urban consolidation development of higher rise housing.

In addition the following items require urgent attention;

1. 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.
2. Significant omissions and mistakes noted in the overlay maps and zone.
3. The Significant and Regulated tree overlay for the whole state needs to be accurate and incorporated into Biodiversity and Climate Change policies.
4. 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'.
5. 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.
6. Align the Significant and Regulated tree provisions as part of biodiversity.
7. Planning for all rural zones should include considerations of biodiversity.
8. Native Vegetation-Support lodgement of development application after contact with Native Vegetation Council (NVC)
9. NVC advice to advocate designing with a view to retention, not removal before designing.

<!--[if !supportLists]-->a. <!--[endif]-->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?

<!--[if !supportLists]-->b. <!--[endif]-->Greybox Gum trees are an endangered species – should be included as a tree worthy of retention.

Thank you.

Submitted by: Jane Mary Preston, 

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