Dear Ms Collins

Natural Resources and Environment Discussion Paper – City of Holdfast Bay Submission

Thank you for the opportunity to provide comments in response to the Natural Resources and Environment Discussion Paper.

The Discussion Paper is based on sound principles, in that it acknowledges some of the key drivers that have a pronounced impact on liveability, and the role that robust environmental policies can play in curbing these. Some emerging trends in the City of Holdfast Bay reflect those identified in the Discussion Paper, include:

- Reduced private open space due to infill development and higher site coverage allowances (allowed for under the State Government’s Residential Code).
- Infill development, increased dwelling density and a trend to larger houses on smaller allotments are reducing private open space in urban areas.
- Loss of tree canopies in Holdfast Bay due to urban consolidation and clearing of rear yards due to relaxation by the State Government of Regulated and Significant tree legislation).
- Contact with nature has been associated with a number of health benefits for everyone, particularly children who demonstrate improved cognitive function, increased creativity and reduced rates of aggressive behaviour.
- Declining biodiversity where plants indigenous to Holdfast Bay are considered threatened.

As a counter measure, it is imperative that planning policies play an essential role in protecting and enhancing Holdfast Bay’s resources and environment, by:

- Protecting areas of environmental significance such as remnant dunes and vegetation along the coastline.
- Protecting and enhancing areas that attract tourism and are value to the community such as the coast and Gilbertson Gully.
• Maximising the use of our natural resources by drawing people to the coast through initiatives such as Coast Park and nature trails.

In this regard, the themes identified in the Discussion Paper as being the main policy areas that are critical to the protection and enhancement of our natural resources and environment, are supported.

Opportunities for ‘green Infrastructure’ need to be explored where a network of green spaces, street trees, water systems and other urban vegetation can deliver multiple environmental, economic and social values to urban settlements. This can be particularly effective as an environmental linkage for coastal communities within Holdfast Bay, and indeed those areas adjacent Gilbertson Gully at Seaciff Park. Another measure could be through Water Sensitive Urban Design (WSUD), which brings components of the water cycle together, including supply and demand, mains water, wastewater, rainfall, runoff and groundwater, and contributes to the local character, environment and community.

Regarding coastal environments, Holdfast Bay contains 11 kilometres of coastline (the majority of which is covered by the Coastal Open Space Zone) and contains the settlement of Kingston Park, which is unique to Metropolitan Adelaide. This coastal area supports important ecological systems and environments (remnant dunes, Plover species of birdlife, Tjilbruke Spring) and also play a key role in the state’s economy through recreation and tourism (Jetty Roads Brighton and Glenelg, Brighton Caravan Park, Coast Park). It is therefore important to have planning policies in place to protect habitats that are highly sensitive to the direct impacts of development, important natural features cultural importance, and landscapes of very high scenic quality. Although the Discussion Paper touches on these elements, it is critical that planning legislation (future Design Code) provide an opportunity to consolidate existing policy to retain content but also to create more consistency and ease of use. As per previous submissions by the City of Holdfast Bay to the Planning Reform process, development that affects the coastal environment must involve an assessment by the Coastal Protection Board through a formal referral process.

With changes to zoning legislation that enable the adaptation of once commercial sites for residential development, the issue of site contamination becomes an imperative consideration. Certain contaminants left behind by previous land uses can cause problems for human health if they are present in high enough concentrations. Contamination does not only occur in soil but also in surface and ground water, causing ongoing issues for land uses. There is support for the proposition that activities that potentially contaminate sites are adequately managed to enable appropriate development and safe use of land. Increasing urban infill puts pressure on using land once occupied by activities that may have left contaminants. Locating residential areas upon disused commercial uses or within close proximity to existing and ongoing industrial uses therefore needs careful consideration when developing planning policies.

It is reassuring that the Discussion Paper acknowledges that effective management of air and noise emissions at the interface between activities and people or sensitive environments is important to ensure that communities are adequately protected from potential impacts. This is increasingly important to manage as our population grows, urban densification increases and mixed-use areas become more common. These need careful management and appropriate planning policies to minimise any interface issues. Cumulative noise impact assessments be undertaken as part of the development assessment process.
Positive aspect aside, there are two specific areas of concern in the Discussion Paper, the first being around energy efficient design. Whilst the Discussion Paper acknowledges that a sustainably designed development plays a fundamental role in creating sustainable and liveable urban environments, and that promoting renewable energy sources and neighbourhood level alternative energy supply and storage options in new developments to reduce energy costs and carbon footprint is vital, it qualifies this by concluding that the upfront costs of these need to be considered and planning controls cannot override the National Construction Code. The Planning Consent process precedes the Building Rules Assessment process, meaning that a commitment to energy efficient design is possible, irrespective of the tokenistic measures acceptable under the National Construction Code. The second area of concern is around how roadside vegetation is viewed and managed. Holdfast Bay has a significant number of trees located along the roadside, including century-old Norfolk Island Pines on Brighton Road at Glenelg. Any reform agenda needs to ensure that policies are in-place to protect and encourage development of roadside vegetation.

Please contact me on [email] should you wish to discuss the submission further.

Yours faithfully

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