

Email to:

DPTI.PlanningReformSubmissions@sa.gov.au

To the State Planning Commission

RE: Submission on Phase 2 of the Code

Main Points

1. The relevant mapping and overlays in Conservation Zone are difficult access and I find the on line version of the draft Code confusing and difficult to understand, for a person who has no experience in working through these texts.
2. Significant omissions and mistakes in the overlay maps and zone are concerning.
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.
 - 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.
10. Tree shortages :I support 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.
11. Also Commission's attention is drawn to the City of Melbourne for inspiration –
12. I support the recommendation for a review of draft Code referring to standards and valuations above.

13. see <https://www.melbourne.vic.gov.au/SiteCollectionDocuments/Tree-valuations.DOC>
14. In rural zonings, area, encouraging perimeter plantings of drought resistant trees provides shelter for stock, lowers ground temperatures and reduces erosion.
15. 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.
16. larger trees be required as part of the landscaping plan for any urban consolidation development of higher rise housing

Submitted by: Simone Hunter

