
From: evonne Moore [REDACTED] >
Sent: Friday, 15 March 2019 1:50 PM
To: Tom Matthews; Christel Mex; [REDACTED]
Subject: Fw: Draft Development Regulations and Practice Directions

From: evonne Moore
Sent: Friday, 15 March 2019 1:47 PM
To: saplanningcommission@sa.gov.au
Subject: Draft Development Regulations and Practice Directions

Sent from [Mail](#) for Windows 10
I make the following submission.

It is a great tragedy that Adelaide continues to lose large established trees and mature vegetation due to the urban infill policies of State governments and the trend to ever-larger houses and private swimming pools.

The head of the Planning Commission Michael Lennon stated to a briefing of councillors last month that Adelaide had lost 30 per cent of its vegetation in the past 10 years. It would appear doubtful that this loss can be fully compensated for given population growth, climate change, the urban heat island effect and the refusal of developers to incorporate green walls or green roofs into their apartment developments. I submit that this green infrastructure, green walls/green roofs should be made compulsory for developments over 5 storeys in height.

The Practice Direction on conditions off consent for new development states that a standard clause must read "Landscaping in accordance with the approved plans must be established prior to the operation of the development and must be maintained and nurtured at all times with any diseased or dying plants being replaced." I submit that the words "in good condition" should be inserted after "nurtured". Councils have had no end of trouble trying to ensure developers maintain landscaping of infill apartment projects plus the subsequent owners of these dwellings may prefer concrete or dead lawn to well-kept landscaping. The landscaping of shopping centres has also been a difficult issue, especially given the lack of shady trees in most of Adelaide's shopping centre car parks resulting in vast expanses of hot baking desert-like conditions for parked cars.

In the other standard condition on landscaping ie "A detailed landscaping plan must be submitted to the relevant authority, to the reasonable satisfaction of the relevant authority... The landscaping plan must identify a mixture of native groundcovers, shrubs and trees to be planted throughout the development site." I submit that the words "prepared by a suitably qualified landscape architect" should be inserted after the words "a detailed landscaping plan". We will only have good quality landscaping of new developments if the persons drawing up the landscaping plans are qualified persons. Even if you only include "suitably qualified landscapers" in lieu of "landscape architects", you will get a better result than the current system.

I submit that there should be some quantitative requirements for landscaping of new developments. Otherwise you will get a few 20 cm strips of landscaping which are too narrow to sustain shrubs and trees. Landscaping beds should be at least 2 metres wide (preferably 3 metres for trees to survive). A tree will not survive in a 2 metre wide strip of vegetation which is surrounded by concrete or other impervious material. Requiring a certain percentage of a development site to be of pervious material would assist in the retention of rainfall and the long-term survival of landscaping. I submit that a minimum of 20 per cent of infill housing sites should be required to be of pervious material. This could result in less concrete, and perhaps more gravel, which should not be too onerous for developers.

It is a great pity that most developers clearfell sites of all existing vegetation when infill housing is proposed for a site. Some effort should be made to keep attractive mature vegetation which has been laboured over and watered by previous residents of a property often for many years. It is a scandalous waste of water, love and energy to lay waste this green infrastructure as though it had no value. It also tramples on our urban history. contributes to the urban heat island effect and decimates habitat for urban wildlife. I submit that the last cited condition of consent on landscaping should add on to the last sentence ie. "The landscaping plan must identify a mixture of native groundcovers, shrubs and trees to be planted throughout the development site, with existing mature vegetation on the site being retained where practical." Or perhaps this should be inserted elsewhere in the Conditions.

It is not clear from the last cited condition of consent whether or not all new landscaping of new developments must consist of native vegetation only, including only native shrubs and native trees. While I applaud the requirement for native ground covers and even native shrubs, limiting new development to native trees only will mean that the large shady deciduous trees are not permitted. Deciduous trees do have their advantages as their canopies are usually broader than native trees plus they provide good shade in summer and solar access in winter.

There are many issues entailed in the draft Regulations and Practice Directions. What will happen to Significant trees and Regulated trees on a neighbour's properties when a private certifier gives the ok for a development which fails to take account of the neighbour's tree? And then the tree has to be hacked back and then it dies. Who compensates the owner of the tree? Who compensates the community?

I support comments in submissions which have been sent to you seeking protection for Contributory Items in Historic Conservation Zones.

I have strong reservations about private planning certifiers doing their employer's bidding regardless of good planning but I understand that this provision is already in the legislation.

Thank you for the opportunity to comment on the draft Regulations and Practice Directions.

Yours faithfully

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