

27 February 2020

**SUBMISSION TO PUBLIC CONSULTATION (Ending 28 FEB. 2020) ON THE URBAN GREEN COVER AND WATER SENSITIVE URBAN DESIGN POLICIES WITHIN THE PLANNING AND DESIGN CODE - PHASE 3**

As a member of Prospect Local Environment Group Inc and resident of the City of Prospect, I support the following to be included the Planning and Design Code Phrase 3 (the Code):

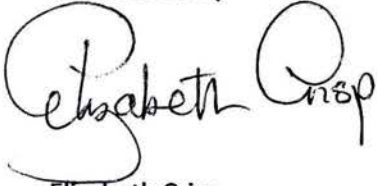
1. The need for guidelines to be developed to support development applicants to maximise the impact and benefit of their development, including:
  - New housing typologies that deliver more green space and additional permeability of traditional hard surfaces.
  - Innovative ways to achieve rainwater storage while not occupying valuable outdoor space, e.g. rainwater tanks as fences, internal walls and under deck tanks
  - Appropriate position, species, function and care of vegetation/trees, particularly to achieve microclimate benefits and identify those that can survive under a future warmer climate, and ways to keep water to these plants through WSUD.
  - The use of structural soil products as a way to achieve deep soil zones in more confined spaces.
  - How to enhance biodiversity in new developments.

The guidelines must either sit on the DPTI website on a "Guidelines for Applicants" page or must have clear links to the website of other government or not-for-profit organisations that have this information.

2. The need for designs that replace the central impervious driveway with a pedestrian only green spine. To achieve this, car parking spaces needed to be decoupled from the housing/lots via a communal undercroft car park. Designs that can achieve this offer a mix of Torrens title townhouses and apartments over the common undercroft car park. A central communal green space would provide:
  - Higher quality green space and greater proportion of deep soils zones
  - Sufficient space for children to play
  - High amenity
  - Support for mental wellbeing
  - Cooling breezes to reduce reliance on air conditioners.
  - Community connection.
3. The need for incentives to provide a greater proportion of communal open space on private land that could be achieved by:
  - Reducing contributions to the open space fund.
  - Land tax laws amended to only tax the impervious portion of the site. [Revenue SA could manage the implementation of Land Tax to be cost neutral overall on the revenue collected, in supporting a percentage discount based on the area dedicated towards trees and gardens (not lawns). Those properties that have been transitioned to multi dwellings with near zero trees and gardens are using more of the land and should therefore pay more. Rooftop gardens and green walls could potentially be included at a reduced discount). (Landscaping: PO 21.1 and DTS / DPF 21.1)
4. Need a DTS solution/guidelines for policy PO 11.1 or PO21.1 that provides details on where the green space is provided for maximum microclimate benefit to the household. (Environmental: PO 11.1 or PO21.1)
4. Ban black/dark roofs due to the urban heat profile. (Environmental: PO 11.1 and DTS 11.1)
5. Need increased rainwater harvesting and use through larger rainwater tanks. (Environmental: PO 11.2 and DTS 11.2)
6. Permeable paving is supported as an excellent way to increase soakage of water into local soils to sustain plants and reduce run-off, however it should not be permitted as a predominant feature of soft landscaped areas. Need more use of pervious materials (e.g. porous asphalt or permeable paving) for driveways and car-parks that are traditionally constructed of impervious materials. (Landscaping: PO 21.1 and DTS / DPF 21.1)

8. Need description of what "soft landscaping" should include and what is unacceptable. We need increased grass, shrubs and other vegetation in these spaces compared with business as usual. It cannot just have gravel with a few minor plants as occurs now. (Landscaping: PO 21.1 and DTS / DPF 21.1)
9. Inclusion of policy for minimum tree planting with a focus on canopy cover (mature spread) provided by larger trees rather than the number of trees. (Landscaping: PO 21.2 and DTS / DPF 21.1)
10. Modelling should be required at the lot scale to determine the urban heat profile of a proposed new development, similar to models for overshadowing and solar access. (Landscaping: PO 21.2 and DTS / DPF 21.1)
11. Need policy incentives for other water conservation measures not just rainwater re-use, such as reuse of grey-water. (Landscaping: PO 21.2 and DTS / DPF 21.1)
12. With increase in hard paved surfaces as a result of urban infill and the associated increased frequency of flood events in local suburbs, need policy that ensures new development should not contribute to local flooding. (All development: PO 22.3 and DTS 22.3)
13. Vehicle access: need policy to protect health and viability of street trees (protection of street trees deemed to be equally important as protection of trees on private land). (All development: PO 23.3 and DTS/DPF 23.3)

Yours Sincerely



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