

From: [Jill Woodlands](#)
To: [DPTI:Planning Reform Submissions](#)
Cc: dunstan@parliament.sa.gov.au; schubert@parliament.sa.gov.au
Subject: Re: Response to Phase 2 of the Planning Code (Rural Areas)
Date: Friday, 29 November 2019 7:50:59 AM

To the State Planning Commission

RE: Submission on Phase 2 of the Code

Hello

Please accept this as my submission re Phase 2 of the Code.

1. The process needs to be simplified to access the relevant maps/overlays as confusing
2. The Significant and Regulated tree overlay for the whole state needs to be accurate and incorporated into Biodiversity and Climate Change policies. The regulated trees overlay policy should include
 - reference for regulated trees in general as indigenous to the local area and important habitat for native fauna as critical for considering retention
 - reference for significant trees as indigenous to the local area, important habitat for native fauna, part of a wildlife corridor and important to maintenance of biodiversity being criteria for retention
 - retention test "Significant Trees should be preserved" rather than "where they make an important contribution to local character and amenity".
 - test for significant trees of "all other remedial treatments and measures have been determined to be ineffective"
3. 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.
4. The Significant and Regulated tree provisions need to be aligned as part of Biodiversity and Climate Change Policies.
5. Planning for all rural zones should include considerations of Biodiversity.
6. Include the following definition of biodiversity in all key overlays and zones ; *the variety of all living things; the different plants, animals and micro-organisms, the genetic information they contain and the ecosystems they form. Biodiversity is usually explored at three levels – genetic diversity, species diversity and ecosystem diversity. These three levels work together to create the complexity of life on earth.*
7. Native Vegetation- I support lodgment of development application after contact with Native Vegetation Council (NVC)
8. NVC advice to advocate designing with a view to retention, not removal before designing.
 - 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?
 - Greybox Gum trees are an endangered species – should be included as a tree worthy of retention.

9. Tree shortages – I support more accurate valuations on mature tree benefits. Refer to the valuation work at the Waite Institute with tree attributes constituting the valuation consisting 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.
10. Suggest review of draft Code refer to standards and valuations above.
11. see <https://www.melbourne.vic.gov.au/SiteCollectionDocuments/Tree-valuations.DOC>
12. In rural zoning areas encouraging perimeter plantings of drought resistant trees provides shelter for stock, lowers ground temperatures and reduces erosion.
13. Review the methods used for demolition. Development sites are being levelled - suggest incentives for developers and demolishers to retain and/or plant.
14. Larger trees be required as part of the landscaping plan for any urban consolidation development of higher rise housing

Submitted by
Jill Woodlands



Cc to local Member of Parliament and the Planning Minister.