



The Gums Landcare Group Inc.

c/- Landcare Association of SA Inc
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28 February 2020
State Planning Commission

DPTI.PlanningReformSubmissions@sa.gov.au

Dear Sir/Madam,

Community response to the proposed State Planning Code

On behalf of The Gums Landcare Group, a group of residents of the City of Campbelltown, we wish to strongly protest the homogenization of urban landscapes throughout the Adelaide Metropolitan area. Our work in The Gums Reserve and in our local streetscapes of Tranmere and Magill has been diminished by recent changes to the Development Act and proposed changes to the Planning Code.

In particular the pride and local identity of communities everywhere has been weakened by developments which are not consistent with surrounding residential homes. This is a blight on our city, not only on Campbelltown, but on the City of Adelaide as a whole.

The pressure to reduce block sizes has led to the loss of trees and overall canopy cover, and consequently the deliberate poisoning of mature trees to enable developments to occur unencumbered by large trees. The increase in hard surfaces, and subsequent reduction in gardens and green spaces that could absorb rainfall minimising stormwater, has led to more frequent flooding events and erosion of tributaries such as Third Creek.

We acknowledge and support the State Planning Commission's Update Report confirming that the current lists of Significant Trees and Regulated Trees from Development Plans will be transitioned into the Code.

We know that there are significant benefits of trees to our environment and living spaces which includes: help to maintain existing shade, contributes to residential amenity, mental health, property values, helps to sustain biodiversity and habitat and importantly temperature control eg deciduous large trees benefit the micro climate with summer shade and winter sunlight and many native Australian trees provide shade, habitat, flowers, nectar and diverse food sources for native birds, animals, and insects.

We support strengthening policy in the area of tree planting and landscaping for infill development and the requirement to have communal green spaces in developments for deep rooted trees and landscaped areas, where natural rainfall can be diverted and used onsite reducing stormwater.



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'Such 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
- and most importantly to participants – community connection.' (Water Sensitive SA 2020 submission)

We support increased rear and side setbacks to achieve minimum green space requirements, enabling more privately owned trees, as well as street trees and other vegetation, to be planted or retained. Setbacks should be consistent with adjacent homes and permit the construction of footpaths that meet Disability Access Standards.

We reiterate that we do not support policy changes which will lead to inappropriate infill and a reduction in tree canopy; eg smaller building sites, and believe that the current/proposed 250square metres for an allotment in Campbelltown, is too small to have effective Water Sensitive Urban Design.

We wish to see a change to the current practice of demolition teams removing all vegetation and instead retain existing trees, where possible.

We believe that the Planning Code should include a new Overlay, which includes mandated urban green cover and climate change adaptation, specifically covering biodiversity.

We request that the Code recognises existing tree canopy as an intergenerational asset, a primary factor in micro-climate cooling, which helps to sustain habitat, biodiversity and neighbourhood amenity.

We believe that there is a need for an additional policy, which recognises that all large trees both indigenous and non-indigenous species, whether in rural or urban environments, have economic value and should retained until dying of natural causes and can no longer be safe or providing habitat and amenity.

A specific policy is needed regarding retention of Grey Box (*Eucalyptus microcarpa*) trees due to their endangered classification and the fact they often do not grow to a regulated tree size.



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We request that the Code encourages design guidelines to manage overshadowing and privacy/amenity issues, especially in the context of the right to access of the sun's rays for solar PV and sunlight into private spaces such as backyards.

We request that the Code has an amendment of the Proposed Regulated Trees Overlay:

- a. To include reference to indigenous to the locality, important habitat for native fauna, part of a wildlife corridor of a remnant area of native vegetation and important to biodiversity of local area.
- b. To change the test for retention of significant trees from "retained where they make an important visual contribution to local character and amenity" to "Significant Trees should be preserved"
- c. In the case of significant trees to include the test of "all other remedial treatments and measures have been determined to be ineffective".
- d. To make all tree affecting development applications subject to public notification and consultation.

In conclusion:

- We believe that the new Planning Code needs to deliver better social, environmental and economic benefits in the context of a changing climate;
- We request stronger policy in the area of tree planting and landscaping for infill development in order to be effective in increasing by 20% the urban tree cover in metropolitan Adelaide in line with Target 5 of the 30 Year Plan for Greater Adelaide 2017;
- We request that the implementation of the Code be delayed until 2021; and
- We request that a second draft of the Code be released for public consultation to ensure that community responses in this consultation have been integrated into the Code.

Yours faithfully,

Chairperson,
The Gums Landcare Group Inc
Tranmere, SA