

State Planning Commission

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To Whom it May Concern

SUBMISSION ON PLANNING & DESIGN CODE - PHASE 3 (City of Burnside)

From: Dr Jennifer Gardner OAM

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In response to the draft Planning and Design Code – Phase 3, which is currently out for public consultation, I wish to register my strong objections to a number of issues as summarised below.

1. **Tree Canopy and Climate Resilience**

The 30-Year Plan calls for an increase in tree canopy cover, however, **the draft Code works directly against this** and will result in a significant reduction in canopy cover and climate resilience by intensifying urban infill, facilitating larger developments, reducing minimum site areas, reducing boundary setbacks and enabling easier removal of trees on both private and public land.

Greater Adelaide has <20% tree cover which is one of the lowest of Australian capital cities. **This is a major concern to me.** At the very least, the current Significant Tree and Regulated Tree Legislation should be retained, and in my view strengthened. We must do better.

The importance of green space and **trees** in particular cannot be underestimated if Adelaide is to aspire to be the most liveable of cities.

Trees provide many environmental services including:

- Ameliorating the heat island effect of dense residential, commercial and industrial developments and hardstand such as roads and paving
- Shading buildings thereby reducing energy costs
- Removing air pollutants such as ozone, nitrous oxides, sulphur dioxide and most importantly particulate matter < 2.5 microns which is very injurious to human health.
- Reducing stormwater runoff and erosion and
- Providing food and habitat for wildlife.

Many studies show that:

- People prefer to shop and do business where there are trees.
- Crime and antisocial behavior are lower in areas with trees.
- Green spaces encourage physical activity thus countering the increasing obesity in our urban population
- Walking in green spaces especially those with trees (called forest bathing) reduces stress, lowers blood pressure, improves other physiological conditions, mood and mental clarity
- Green spaces foster positive community interactions and community cohesion
- Trees on both public and private land increase property values.

Trees beautify an area and provide screening to increase residential privacy.

I am dismayed by very dense residential developments such as Glenside, misleadingly described as 'Garden Apartments' which removed 60+ mature healthy trees before building commenced. The crowded apartments have no shading and are designed with no or little eaves which do not address our hot dry climate. There may be a promise to plant new trees, but it will be many decades before the large species provide the environmental benefits listed above, and often the 'trees' are small species like Crepe Myrtles or shrubs which provide no shade to sit under.

2. General Neighbourhood Zone

The draft Code places some areas of the City of Burnside in the General Neighbourhood Zone and the Housing Diversity Zone. While there are some advantages to simplifying and standardizing the current planning regulations, this 'one zone fits all' policy is at odds with current zone policy and will lead to intensification of development, loss of green space and neighbourhood character. I request that you **move all residential areas in Burnside to the Suburban Neighbourhood Zone** with TNVs to match existing conditions. Large suburban blocks could still be developed with several single storey housing units to accommodate local residents looking to downsize and remain in the area, but with sufficient setbacks and garden courtyards.

3. All Existing Residential Areas

a) Non-Residential land use

Currently in the City of Burnside's residential areas, shops, offices and educational establishments are non-complying. In my view all **existing** uses which are currently non-complying in our residential areas (e.g. **small** offices, doctor's consulting rooms, local schools, aged care facilities and shops) which relate to **suburban** activities should be retained as "**restricted development**". With an aging population there is arguably a need to retain the corner deli or **small neighbour clusters** of shops and consulting rooms, or **small** aged care facilities which enable long-standing residents to remain in their familiar suburb.

New large scale non-complying developments which would be allowed in the new Code would adversely impact traffic, parking, noise, and neighbour's amenity and **are unacceptable** in Suburban Neighbourhood Zones. These non-complying developments belong in designated and well defined **District Centres** such as Burnside Village where adequate parking is provided and services such as banks, health care, restaurants, small businesses, shops and a cinema can operate.

b) Siting and Setbacks

Under the Code, building setbacks from side and rear boundaries will noticeably decrease, particularly at upper levels. This is **unacceptable** and will severely impact amenity and privacy. A reduction of upper level from the current 4m from the side to 2m under the new Code leaves no room for the establishment of trees, and 8m from the back to 5m under the new Code leaves barely enough room for a large shady tree. **Existing siting setbacks should be maintained as a minimum** throughout all our residential areas.

c) Density and Allotment Sizes: The draft Code contains a number of errors and omissions. It is important that current minimum allotment sizes, heights and frontage widths match existing. The loss of green spaces and trees in particular resulting from decreased allotment size and increasing density has been addressed above in item 1.

4. Historic Area Overlay

The lack of identification of Contributory Items in the Code, by either a map or list of addresses, will create uncertainty and confusion for owners, prospective buyers, neighbours and developers. Existing protections and identification of Contributory Items should be maintained.

5. Commercial Centres

The Code places large scale centres in the same zone as small local shops, allowing large scale development and more intensive land uses throughout all these areas. **This is inappropriate**. A hierarchy of centres should be maintained. Additional zone(s) are needed to cater for the lower intensity local centres, particularly in older established areas.

6. Public Notification

The Code should reflect the City of Burnside's current Development Plan policy with respect to the notification of neighbours and the public. The Code should include notification for all development that increases development intensity, including additional dwellings on the site and change of use from residential to non-residential.

Unless the above issues are addressed and the draft Code is amended to reflect these concerns, there will be an unacceptable loss of local character and amenity in my neighbourhood.

I trust that the concerns detailed above will be given your full consideration.

Yours sincerely

Jennifer Gardner
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