

Reference: D0013937927

Mr Michael Lennon
Chair
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

Dear Mr Lennon,

Re: Planning and Design Code Phase 3 Revised Draft

Thank you for providing the Hills and Fleurieu Landscape Board (the Board) with the opportunity to comment on the Planning and Design Code Phase 3 Revised Draft. The Board notes that this is the final round of consultation on Phase 3 and that the Code will come into effect early in 2021. In addition, feedback has been provided earlier in 2020 (earlier phases) and also via inclusion into a submission that has been prepared by the Department for Environment and Water.

The Board would offer the following comments to this round of feedback:

- 1) Existing mature trees: the Code should prioritise the retention of existing mature trees in the urban environment for the significant services they provide to communities, including urban cooling and climate adaptation, amenity and biodiversity. There is significant growth of urban centres and expansion of development in the Hills and Fleurieu region. Planting of new trees in these development areas is not equivalent to the services provided by mature trees. The board supports the establishment of the new Urban Tree Canopy Overlay as the vehicle for encouraging tree planting and retaining existing mature trees.
- 2) Guidelines supporting Code content: The Board considers guidelines would be a useful tool to support the implementation of the code for matters such as water sensitive urban design, landscaping, green infrastructure, climate smart urban design, coastal areas, native vegetation and flooding.
- 3) The Board recommends inclusion of an additional provision to the *Design General Provisions* to require soft landscaping and tree planting maximises the use of locally indigenous plant species that are suited to current and future climate conditions and avoids pest plant and weed species.
- 4) The Board supports the inclusion of *Open Space and Recreation General Provisions* about landscaping with locally indigenous species and passive watering using stormwater run-off.
- 5) The Board commends the inclusion of the new Stormwater Management Overlay which aims to increase runoff capture and provide for detention of stormwater.

- 6) The Board notes the improvements in the hazard bushfire overlays post consultation. We understand works are continuing on the mapping to support the spatial application of these overlays, and urge that these be updated as quickly as possible to ensure that areas at risk from bushfire hazard are accurately identified.
- 7) Regarding future work on Generation 2 and supporting documents:
 - a. Further work is required to ensure that forestry policies and the commercial forestry definition do not adversely restrict farming for carbon capture and storage. Carbon storage may be a key mechanism for South Australia to achieve the aim of net zero emissions by 2050.
 - b. The Board supports the concept of creation of an additional Overlay to protect biodiversity and critical habitats.
 - c. The Board considers that further work may be needed to develop an approach in the land use planning system for dam and levee bank management.

For further information regarding this feedback, please contact Wendy Telfer, Manager, Planning Engagement and Partnerships, at [REDACTED] or on [REDACTED].

Yours sincerely



Michael Garrod
General Manager
Hills and Fleurieu Landscape Board