

**From:** [Maryanne Martin](#)  
**To:** [DPTI:Planning Reform](#)  
**Subject:** Public consultation for the Draft Planning and Design Code  
**Date:** Friday, 28 February 2020 9:35:18 PM

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Dear DPTI and Mr Marshall

We are very concerned about the amount of subdivision we have been seeing around the suburbs of Adelaide. We are also seriously concerned over the further loss of trees, including overall canopy cover, and the further loss of heritage/character buildings and housing with the new proposed Planning and Design Code for South Australia.

**If you could please respond to this email confirming that you have received my submission.**

HERITAGE

There are many beautiful houses which are treasures around South Australia, specifically we would like to highlight some in the Adelaide Hills. Some are heritage listed, some are not. We are seriously concerned that 367 allotments in parts of Crafers, Crafers West, Stirling, Heathfield, Upper Sturt and Aldgate could be carved up into smaller housing blocks under the State Government's Draft Planning and Design Code. This will potentially threaten the viability of existing houses, as well as one of the best aspects of the Hills: open spaces.

We are also concerned about the plan to rezone Mile End, Torrensville, Cowandialla and Hilton into a newly created zone called 'Housing Diversity neighbourhood zone'. This is not similar in any way to how these areas are currently zoned. Under these new plans, a character home could be demolished for residential flats or row houses with no amenity. Increasing density up to 70 dwellings per hectare in this neighbourhood area is dramatically different to the current zone and will significantly affect the lifestyle currently enjoyed by people living in those areas. For the sake of heritage – these areas should be classified as a 'Suburban Neighbourhood Zone' in keeping with the rest of Mile End, Torrensville and Thebarton.

Heritage matters, South Australia has history worthy of keeping. Removal of these buildings and houses will result in the loss of our City's valued heritage and will significantly change the character and feel of an area. The market will not protect these buildings and houses due to the nature of it, individual people are getting bought out by developers who have more money. Younger residents especially, who are interested in saving character houses from demolition and subdivision are simply unable to afford them in the housing market.

We believe that, overall, the proposed Code drastically weakens planning policies which will allow for inappropriate development, particularly in place of historic houses. It will allow developers to buy up family houses and replace them with multistorey units. The

new Code means removing many of the protections of our built and natural heritage.

Our requests:

- A. contributory items not be removed from the Planning System;
- B. State and Local heritage listed buildings and houses not be demolished without determining that all other remedial treatments and measures are ineffective (i.e., that the building cannot be saved due to structural issues);
- C. that adjoining owner notifications be retained for all development, including new houses;
- D. non-complying development with 3<sup>rd</sup> party appeal rights be retained;
- E. councils retain control over planning and development in their areas;
- F. residents appeal rights against all new developments be retained;
- G. Historic Conservations Zones be retained with specific guidelines and strong demolition controls;
- H. that subdivision controls in quaint Residential Character Zones be retained;
- I. private open space % of a site for trees, vegetation and wildlife either be retained as it stands or increased;
- J. reduced overlooking, or retention of the current 1.7m;
- K. retained noise control (from e.g., air conditioners) and *not* reduction of it;
- L. that the hierarchy of commercial activities be retained (so as commercial shops/businesses cannot just be built anywhere);
- M. that subdivision be the minimum, rather than the majority, of developments;
- N. that the 29 specific residential policy areas that highlight the differences in local character of each suburb in our City be retained and NOT condensed into just three residential zones across Councils; and
- O. the process of heritage protection remains objective in nature and consistent in our City.

## TREES

We acknowledge and support that the State Planning Commission's Update Report confirmed that current lists of Significant Trees and Regulated Trees from Development Plans will be transitioned into the Code. We, however, remain concerned about the loss of overall canopy as even now, before implementation of any new code, we have seen mass removal of mature trees to be replaced with vegetation, such as a small bush, which does not remove the same amount of CO<sub>2</sub> from the air that a mature tree does. Trees are often removed to make way for development and infrastructure and are not replaced.

We are worried about the loss of trees and overall canopy for reasons of air quality, loss of shading, and loss of habitat for wildlife. While it is highly variable, a mature Blue Mallee eucalyptus tree (native to Australia) can absorb and store as much as 25.3 tonnes of carbon with 14 years of growth (reference: <https://www.co2australia.com.au/how-much-carbon-does-a-tree-offset-which-tree-is-best/>). And that is just one example. Essentially, trees absorb carbon dioxide and release oxygen while cleaning the air we breathe and they

filter the water we drink. Furthermore, without canopy cover our neighbourhoods will become increasingly hot as little cover and shade equates to rises in ground temperature. This is certainly not ideal considering the climate crisis our planet is currently facing and that the overall temperature of the planet is rising. We need trees now more than ever before due to our hotter summers; we need somewhere to hide from the harsh sun! Large trees benefit the micro climate with summer shade and winter sunlight. We have unfortunately seen the effect of what over-development, over-subdivision and extensive loss of trees can do to a suburb by looking at Campbelltown which stands as an example – it is now the hottest suburb of Adelaide due to the extensive loss of canopy and they are now trying to rectify the terrible decisions that led to this. This is concerning seeing as urban heat is one of the biggest killers of people in the community (reference: <https://www.abc.net.au/news/2019-12-19/urban-heat-islands-impacting-australias-most-vulnerable/11811274>). It is, therefore, not just a visual problem but also a public health problem. A leafy suburb can reduce the temperature by a few degrees compared to barren suburbs. Trees in Australia also provide habitat to over 80% of the world's biodiversity, a single tree in South Australia can be home to hundreds of species of insect, fungi, moss, mammals, and plants. We can help sustain biodiversity and habitat by ensuring trees are not only protected through development but that they are considered a **vital** part of town planning. Other benefits of trees in our suburbs include helping to contribute to residential amenity, mental health, and property values. All the benefits of keeping trees in our suburbs are too numerous to list!!

If you couldn't already tell, we support strengthening policy in the area of tree planting and landscaping for infill development. We do NOT support policy changes which will lead to inappropriate infill and a reduction in tree canopy, for example with the proposed smaller building sites. We would like to encourage change to the current practice of demolition teams removing all vegetation (i.e. bulldozing the entire block back to a barren block of dirt) and, instead, please encourage developers to retain all vegetation where possible on a building site. It IS possible to retain existing trees and build around them, we have seen it done and it should be a priority to keep them.

Our requests:

- A. that the Code include a new Overlay which includes policy on urban green cover and climate change adaptation, specifically covering biodiversity;
- B. that the Code recognise that existing tree canopy is an intergenerational asset and a primary factor in micro-climate cooling which helps to sustain habitat, biodiversity and neighbourhood amenity;
- C. 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 be retained until dying of natural causes;
- D. inclusion of specific policy regarding retention of Grey Box trees due to their endangered classification and the fact they often do not grow to a regulated tree size;
- E. that there is a requirement for at least one tree per development;

- F. that there is a requirement for a minimum % of all blocks of land to have permeable landscaped garden areas;
- G. that the Code encourage design guidelines to manage overshadowing and privacy / amenity issues; and
- H. amendment of the Proposed Regulated Trees Overlay to include:
  - a. reference to indigenous trees 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”; and
  - d. to make all trees affecting development applications subject to public notification and consultation.

We are all for development of our beautiful State in a smart, considered, people and environmentally friendly way. We are NOT for development in a way that is solely music to developers ears and no one else’s – that is about money and not about people. At the end of the day we all have to live here and having money will not protect the rich from the effects of the loss of trees and climate change. Development does not have to mean the infill of cheap and ugly houses being built throughout our State. One size DOES NOT fit all! Please do not use this approach for our entire State.

We surely hope that you are closely listening to more educated and experienced voices than mine, but please consider my concerns in the development of this new Code.

We look forward to your response.

Kind regards

Maryanne and John Martin

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