

State Planning Commission

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SUBMISSION ON REVISED DRAFT PLANNING & DESIGN CODE - PHASE 3

I am writing on my own behalf as a resident of Holdfast Bay.

I was recently looking at a list of significant and regulated trees in the City of Adelaide which may be some years old and tried to use SAPPA maps to look at the trees in North Adelaide. Many addresses were not found on SAPPA but were on Google Maps. I don't know if this is just an issue with North Adelaide eg. 55 - 59 Palmer Place North Adelaide, 172 Molesworth St North Adelaide were not found.

Urban infill may be desirable to save a large N-S area of land being taken up by Adelaide and its environs but if it means that most existing large suburban housing blocks are reduced in size to allow one or more subdivisions and those subdivisions are mostly taken up by concrete or buildings then it reduces quality of life for all the residents in the area as greenery is diminished. A maximum infill limit should be enforced so that subdivision is not allowed above a certain amount in a street or neighbourhood.

The aims of the 30 Year Plan for Greater Adelaide were to produce at least 30% tree canopy cover but councils cannot increase street trees or trees in reserves and other council land enough to compensate for the huge number of mature trees being removed from private land, currently estimated to be at least 2 a day on average. Large trees should be protected and that is not just by the significant and regulated tree legislation but also by stopping developers automatically clearing all land they purchase for development before building. If they had to pay the value of the trees as estimated by the Burnley method then they might reconsider but even better if penalties applied to stop this practice and retain trees where possible unless proved to be unsafe.

Developers can currently remove trees within 10m of a building or pool on a neighbouring block yet do not have to ask the owner of that block if they want the tree/s removed or are happy for it/them to stay. This causes many trees on or near boundaries to be unnecessarily removed, even when they are significant. I also saw in the Regulated and Significant Tree Overlay that Performance Outcome 1.3d states: **reduce an unacceptable hazard associated with a tree within 20m of an existing residential, tourist accommodation or other habitable building from bushfire.** I thought

trees in medium-high bushfire risk zones could be removed within 20m and in other zones the distance was 10m but this related to my house address in Seacliff which is not in a bushfire-risk zone so this must be a general rule, which seems extremely severe and should be removed as even the CFS acknowledges that large trees are often better at preventing fire than shrubs and grass which they reduce. An arborist should be asked to consider the individual situation before any trees are removed using this rule.

The unnecessary removal of trees is therefore not addressed by the new planning code and the lip service of planting 1 – 3 new trees depending on block size will not address this flaw especially if developers are let off with a minimum payment into a tree fund instead! They should not be allowed to avoid their responsibilities like this. Do not allow such excuses – make them plant a tree and ensure it is there when the house is sold and still healthy. Offsets are not a good alternative either as loss of a tree in one area affects the local fauna and residents so a tree elsewhere will not help them. There is a high likelihood that many new young trees will die before reaching maturity (especially as climate change means a hotter drier climate in SA) so more than one should be required in a small house block and up to 6 in other blocks as, even if they do mature, the suggested trees per block have been calculated to only give approximately 2% tree canopy cover per house block -most trees will not be large ones so this will not help fulfill the aims of 30% TCC. The City of Sydney requires many more trees per house block to be grown and there is no reason why Adelaide should be behind them in tree canopy coverage yet we are the worst Australian city for TCC and not improving our position. It is critical that this new planning code stops the loss of greenery before all large old trees are lost. Use of the term 'green infrastructure' does not mean the same as 'tree canopy cover' and the two should not be conflated. Both are desirable but trees underground stormwater and reduce heat islands as well as sink carbon so are very valuable especially when they also are old enough to have hollows as habitat for native fauna. Requirements for minimum tree planting size and ongoing maintenance should be written into both Code policy and conditions of approval.

The reason Seacliff was made a separate zone in Holdfast Bay was because the fishing village origin was to allow smaller block sizes and retain one-storey buildings so it is amusing to see that its block sizes are now larger there than elsewhere in Holdfast Bay, although the one-storey height limit does make that acceptable. I personally feel that block sizes are now too small to allow for a reasonable size house and allow for any garden so that children are now forced to stay indoors or play on council reserves thus putting pressure on availability of council open space.

Another trend in this new code is the reducing lack of notification to neighbours and the reduced ability to complain about plans for development or amendment. I do not agree with this either as residents should be able to confidently buy a block and know that their future rights of privacy and light will be protected. The planning code should enforce notification of neighbours and the general public of all increases in development intensity, additional dwellings on site, increases of building height, raising ground level for buildings over 60cm, development on the boundary or changes in building use.

The current draft code will allow developers much more freedom to the detriment of residents, local character, amenity in our streets and our mature trees. I hope this opportunity to put a higher bar for developers re building quality and originality, passive climate control of new housing rather than reliance on bigger and bigger air conditioning systems, importance of buildings sitting well in their surrounds and being compatible to other local building styles will be taken as it will no doubt be a long time before amendments to this new code will be made. Be bold and take the chance to improve life for urban residents, not just with flashy murals and artwork as you chose to show on your cover photo (with no greenery in sight) but, now that we understand the importance of greenery for our own mental and physical health as well as the health of our environment and the flora and fauna we share this planet with, let us use plenty of complimentary plantings as well.

Yours sincerely,

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