

7th December 2020

Hon. Vickie Chapman,
Minister for Planning and Local Government,
Level 11,
45 Pirie Street,
ADELAIDE SA 5000
Email: AttorneyGeneral@sa.gov.au

Dear Minister,

RE: Tree Canopy provisions of Draft Planning and Design Code

COTA SA and Australian Youth Climate Coalition (AYCC) wish to advise you of our great concern regarding the tree canopy provisions of the Draft Planning and Design Code (PDC) which is currently out for public consultation until 18th December 2020.

COTA SA is an older people's movement representing 633,000 South Australians on a range of issues of importance as we age while the Australian Youth Climate Coalition (AYCC) is Australia's largest youth-run organisation. Its mission is to build a movement of young people leading solutions to the climate crisis.

COTA SA regularly surveys its members and has recently found very high levels of concern (90% of respondents) about the effect of climate change on their current well-being and the future of their children and grandchildren. This has led COTA SA to join with AYCC on a cross-generational approach to climate change. At our first webinar, entitled *Generations Together for Our Climate* with Dr John Hewson (former Federal Liberal Opposition Leader), Sam James and Hollee McKinnon (both from AYCC), COTA SA launched its Climate Change Statement: (<https://www.cotasa.org.au/lib/pdf/policy/Climate-Change-Statement-of-Interest-Sept-2020.pdf>).

One of the most practical ways that communities can adapt to climate change is to ensure that there is appropriate cooling for our suburbs. We therefore strongly support the Government's target of increasing our tree canopy cover by 20% by 2045 – part of the 30-Year plan for Adelaide. (https://livingadelaide.sa.gov.au/_data/assets/pdf_file/0003/278265/Target-5.pdf).

Recently, the SA Government commissioned a study entitled *OPTIONS ANALYSIS: Costs and benefits of Urban Tree Canopy Options for Minor Infill Development in the Planning and Design Code* prepared by BDO Econsearch. This document notes on page iii of the Executive Summary that the target to increase tree canopy *is at significant risk, with tree cover reducing from 21.5 per cent to 19.5 per cent across metropolitan Adelaide between 2013 and 2016.*

The Draft PDC contains manifestly inadequate measures for future developments to be assessed as *Deemed to Satisfy* in respect of tree canopy. Under the *Urban Tree Overlay Assessment Provisions* (PO1.1 of the PDC) viz *Trees planted or retained to contribute to an urban tree canopy*, a proposed development is *Deemed to Satisfy* if a site up to 450 sq. metres only contains **one small tree** (spread of 2 metres minimum) and soil area of 10 sq. metres around the tree.

This means that the tree canopy only needs to be approx. **1% of the site** in order to be automatically approved. The soil area only needs to be approx. **2% of the site**.

For larger sites, the percentages of tree canopy cover and soil area are only slightly larger: even for a site of over 800 sq. metres, tree canopy can be as low as that provided by four small trees (of 2 metre minimum spread) i.e. a tree canopy of only **2% of the site** and soil area of 60 sq. metres or **7.5% of the site**.

With targets as low as 1 to 2% of tree canopy cover for new developments, there is no prospect of reversing the decline in tree canopy cover as evidenced in the OPTIONS ANALYSIS paper, let alone achieving an increase in cover as laid out in the 30 Year Plan. There is a complete inconsistency between the 30-Year Plan and the PDC in this respect. Yet this increase is essential if Adelaide is to have any chance of mitigating and adapting to climate change which is now upon us.

Other jurisdictions are aiming for much higher targets. In New South Wales, for example, the Government Architect has released its *Draft Greener Places Design Guide*: refer to: <https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/discussion-papers/discussion-guide-greener-places-2020-06-03.pdf>. The Guide sets out, on pages 34 and 35, the proposed targets for tree canopy cover. In the CBD of Sydney, the target is 15% or more of cover; in medium-high density areas of Sydney, the target is 25% or more; and in low density areas, the target is 40% or more.

Given these targets, and a land cost in Adelaide which is much less than in Sydney, why is the PDC aiming so low? The PDC will fundamentally affect our city's future and we must set a course which enables us to have a liveable city, despite climate change. The current PDC targets for tree canopy will not get us there.

We recommend that targets comparable to Sydney replace the tree canopy targets in the Draft PDC. If this does not happen, Adelaide is headed towards a much hotter future as climate change unfolds.

We would welcome the opportunity to meet with you as older and younger members of our community to discuss this vital cross-generational concern.

Yours sincerely



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