Regarding the review of the Planning and Design code in relation to urban trees, I note that it occurs in the context of significantly less tree coverage in most Adelaide suburbs than existed a decade ago. Nor has this loss been uniformly spread. Suburbs characterized by socioeconomic disadvantage (Salisbury Downs and Vale Park) have borne higher levels of tree loss than new suburbs. These newer suburbs have increased levels of tree coverage, but from very low starting points, which means that they have made only a marginal increase to overall tree coverage. In an average year, Adelaide loses 75, 000 trees, which is a shocking statistic that should shame those responsible. The benefits of tree coverage are so substantially documented that I see little point in reiterating them in this submission.

I am surprised, given these data, that the ambition of the Planning and Design code in relation to tree coverage is so limited in its ambition. Council areas with more than 30% tree coverage should aim for no net loss by 2045. Such woefully low expectations do increase the chance of "success". But what is clearly required is a more proactive vision for increasing tree coverage and green spaces generally across Adelaide. Further, the absence of any recognition to counter the inequity in tree loss is disappointing and likely to weaken any strategy that is implemented.

At its core, I believe the lack of protection for trees in Adelaide stems from the level of control exerted by the state government and by its clear preference to prioritize the wishes of developers. Current South Australian regulations allow the removal of most species of trees within 10 metres of a property without approval. Further, significant trees can be cut down if they are considered to impede a proposed development. These regulations have clearly played an important role in reducing tree coverage in Adelaide and should be scrapped. They are not fit for purpose in terms of greening urban areas and in generating the environmental services that are increasingly necessary in the face of climate change. Given the magnitude of tree loss in Adelaide during the past decade, the Offset Fund, available to those who wish to fell trees, is clearly a policy failure and should be abolished.

Addressing the issues of developer-friendly regulations and inequity in tree loss could be addressed by giving greater power to Councils to address tree coverage in their areas. In addition, Councils in less socio-economically advantaged areas should be appropriately resourced to support efforts toward significantly increasing tree coverage. Councils have better knowledge of their physical and social environments than state governments. Other states accord Councils greater power in relation to tree coverage and have not witnessed the declines evident in Adelaide.

I note from the online survey on Planning and Design codes in relation to urban trees there is a focus on tree circumference and height. While these factors may be important, it is strange

that a Planning review primarily focuses on a set of specific indicators that may help slow the rate of tree loss. Surely what is required is a proactive plan to increase tree coverage across all areas of Adelaide rather than piecemeal strategies to help stem the loss of trees. I also suggest that the focus be broadened from tree coverage to increasing green coverage in urban areas. While the environmental, social and economic benefits of trees are well recognized, it is also important to consider the benefits of all types of vegetation in maintaining and, preferably, enhancing biodiversity. Trees are an important part of an ecosystem but are not the sole component.