

Sellicks Woodlands and Wetlands Action Network (SWWAN)



Submission to
The Planning System Implementation Review
16.12.2022

Dear Expert Panel,

The Sellicks Woodlands and Wetlands Action Network would like to raise your awareness to an unusual effect on canopy coverage targets, as described in the 30-Year Plan for Greater Adelaide, caused by the wording of the guidelines and methods used to calculate the targets.

The effect of this is that councils with the least amount of canopy coverage are setting the smallest targets and councils currently above 30% are setting none. This is despite Adelaide having an average of only 27% canopy cover, which is much lower than most other Australian capitals and the national average of 39%.¹

We are concerned that this will result in a lack of adequate canopy coverage in the future to protect our communities from the effects of climate change which will, by then, be too late to do anything about. We ask that you consider our arguments and our proposed solution described on the following pages.

Yours Sincerely,
The SWWAN Committee.

¹ [Where are all the Trees? Greener Spaces Better Space P9](#)

Current Canopy Cover Targets

The current targets are laid out in the 30-Year Plan (Target 5).

“30 Year Plan for Greater Adelaide (2017 Update) Target 5²

Target 5:

Urban green cover is increased by 20% in metropolitan Adelaide by 2045.

- *How this target will be measured:*
The target will be measured using software consistently applied to local council areas across the Adelaide metropolitan area. It is recognised that councils currently have varying amounts of tree canopy cover.

- *Therefore, the following is proposed:*
 - *For council areas with less than 30% tree canopy cover currently, cover should be increased by 20% by 2045.*
 - *For council areas with more than 30% tree canopy cover currently, this should be maintained to ensure no net loss by 2045.”*

The first problem is that the targets being set by councils are calculated as 20% of current coverage. We believe that these guidelines have been misinterpreted and that the intention of the proposal was to protect the state’s population by having all councils increase their canopy cover percentage score by 20, so that all councils were above the 30% benchmark level by 2045.

This current interpretation means that the targets being set by South Australian Councils are far below what is needed to address climate change. It also means councils most in need of increased coverage have set the lowest targets and consequently will make the least increases in coverage.

The City of Onkaparinga³, currently with a nationally low coverage of 12.5%, has a goal of increasing coverage by 2.5% to reach a target of 15% in 2045. A target that 23 years later will still be far below the Adelaide baseline average of 27.8% and 60% below the current national average of 39%⁴. The City of Unley⁵, currently has coverage of 26% and has set a target of 31% coverage by 2045, more than double the City of Onkaparinga but still below other Australian capital cities.

Under our interpretation the City of Onkaparinga would have set a target of 32.5% just above the state average and the 30% threshold but still below the national average. The City of Unley would have set a target of 46% placing it just above the national average. (Table1)

² [30 Year Plan for Adelaide \(2017 Update\) p150](#)

³ [Tree targets and mapping City of Onkaparinga \(onkaparingacity.com\)](#)

⁴ [Where are all the Trees? GreenerPlaces BetterSpaces P9](#)

⁵ [city-of-unley-tree-strategy-2020.pdf](#)

The second problem is that councils with canopy cover greater than 30%, such as at the City of Mitcham, are setting goals only to maintain current coverage.⁶ This ignores the fact that the Adelaide metropolitan region is far below the national average and we should be looking to that benchmark as a target for greener suburbs.

Our suggestion.

That the guidelines be more clearly defined to allow the accurate setting of goals commensurate with what is needed to protect our health in the future.

Suggested new wording for 30 Year Plan Target 5

Target 5:

Urban green cover is increased to at least 30% coverage within each metropolitan Adelaide council by 2045. That the overall average for metropolitan Adelaide is above the current National average of 39% by 2045.

- How this target will be measured:
The target will be measured using software consistently applied to local council areas across the Adelaide metropolitan area. It is recognised that councils currently have varying amounts of tree canopy cover.
- Therefore, the following is proposed:
 - For council areas with less than 30% tree canopy cover currently, total cover should be increased by a total of 20% to above 30% total coverage by 2045.
 - For council areas with more than 30% tree canopy cover currently, total cover should be increased by a total of 15% to above the current National Average of 39% by 2045
 - For councils with greater than 39% canopy cover should increase by 20% of the current area.

	City of Onkaparinga	City of Unley	City of Mitcham
Current Canopy Coverage	12.5%	26%	42%
2045 Current Targets (increase)	15% (2.5%)	31% (5%)	42% (0%)
2045 SWWAN Targets (increase)	32.5% (20%)	46% (20%)	50% (8%)

Table1 : Comparison of canopy coverage targets for 3 Adelaide councils.

We understand the scale and cost of what we are asking but the scale is simply what is needed and the cost less costly than following plans that don't achieve what they were required to do.

Thank you for your time, we wish you the best in your work for the future of Adelaide.

Sincerely,

The SWWAN Committee.

⁶ [City of Mitcham Tree Strategy](#)