

26 August 2022

Mr. John Stimson  
Presiding Member  
DTI Planning Review  
GPO Box 1815  
ADELAIDE SA 5001

Email: [DTI.PlanningReview@sa.gov.au](mailto:DTI.PlanningReview@sa.gov.au)

Dear Mr. Stimson

**Re: Expert Review of SA Planning System**

I am the Chief Executive of the Council of the Ageing in South Australia (COTA SA), the peak body representing the rights, interests and futures of almost 700,000+ older South Australians.

I am writing to you concerning the expert review of the Planning System (including the Planning and Design Code) announced on 5 August 2022. This follows the Government's commitment in the 2022 election campaign to review the Planning and Design Code to enable "planning decisions that encourage a more liveable, competitive and sustainable long-term growth strategy".

Members of COTA SA have indicated that they have a personal interest in the issue of climate change adaptation and mitigation, and the impact of the Planning and Design Code on the future liveability of our communities in the face of climate change.

Feedback from older South Australians following the 2019-20 South Australian bushfires led to COTA SA setting up a Climate Change Group to explore and report what older South Australians can do at an individual, practical level about climate change. Since then, the Climate Change Group has conducted member surveys on climate change, released a statement of interest<sup>1</sup> and held a webinar jointly with the Australian Youth Climate Coalition (AYCC) headlined by Dr John Hewson AM.<sup>2</sup> The Climate Change Group has also advocated for better tree canopy provisions in urban design and planning codes with the previous Minister for Planning.

One of the goals of the Planning System is for urban green cover to be increased by 20% in metropolitan Adelaide by 2045 (refer to [https://livingadelaide.sa.gov.au/\\_data/assets/pdf\\_file/0003/278265/Target-5.pdf](https://livingadelaide.sa.gov.au/_data/assets/pdf_file/0003/278265/Target-5.pdf)).

The importance of this goal in helping the community to adapt to climate change is well understood. Unley Council's Tree Strategy is an excellent example of local government making plans which support this goal (refer to <https://www.unley.sa.gov.au/files/assets/public/council/about-the-council/city-of-unley-tree-strategy-2020.pdf>).

<sup>1</sup> <https://www.cotasa.org.au/policy/climate-change.aspx>

<sup>2</sup> [https://www.youtube.com/watch?v=WjE\\_FIM0tho&feature=youtu.be&ab\\_channel=COTASA](https://www.youtube.com/watch?v=WjE_FIM0tho&feature=youtu.be&ab_channel=COTASA)

Burnside, Mitcham and other Adelaide councils have also developed Tree Strategies in the last decade – all referring to the impact of climate change and the cooling impacts of trees. We support the reference in the Burnside Tree Strategy to tree canopy as “critical urban infrastructure”.

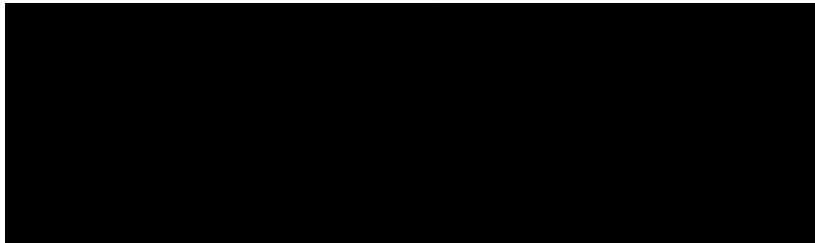
Our concern is that the Planning and Design Code is not fit for purpose to achieve the goal of an expansion in tree canopy. In new developments – often associated with demolishing an existing property and building two or more dwellings in its place – the requirement in the Code for tree canopy represents, in most cases, a substantial reduction in tree canopy. In PO 13.2 and DTS/DPF 13.2 under the *Design in Urban Areas* section of the Code, the minimum coverage of tree canopy is only between 2 and 10%, depending on the size of the block.

**There is no possibility that the overall goal of increasing tree canopy can be achieved under the current rules.**

I urge you to propose amendments to the Code to ensure that the important goal of increasing tree canopy in Adelaide can be met. It’s vital for the future liveability of our community.

Please contact COTA SA at [cotasa@cotasa.org.au](mailto:cotasa@cotasa.org.au) or on 08 8232 0422 for further discussions on this important matter.

Yours sincerely



**Jane Mussared**  
Chief Executive