



## Submission on the Living Green to 2020 Review, August 22, 2018

The Living Green to 2020 Review shows the City of Charles Sturt is putting both dollars and effort into many activities to green the city, increase biodiversity, reduce the Council's environmental footprint and adapt to climate change. However nowhere in the review is there mention of conflicting Council actions and community attitudes that act counter to these positive actions. This submission from Western Adelaide Coastal Residents Association (WACRA) will champion the actions that support sustainability but also highlight the negative forces that the Charles Sturt Council must address to achieve real progress toward a better city environment and a more sustainable future in 2020 and beyond.

WACRA supports the activities that are covered in the draft Living Green to 2020 Review. 156 tasks for action are grouped in 5 new themes, Our Community, Our Liveability, Our Environment, Our Economy and Our Leadership. There is some element of duplication where the same aim is repeated with a different target audience or a different Key Responsibility team within Council. We particularly applaud the Heat Island report, the Biodiversity Action Plan, the Adapt West Adaptation Plan and monitoring against KPIs. The creation of two new positions to implement these last plans shows real commitment from the Charles Sturt Council.

The vast number of policy statements and Council Plans to support the Living Green to 2020 Program is staggering and while reading each it is hard to find any activity that is not worthwhile. This vast group of desk top studies includes the following:-

- Tree Canopy Cover in the City of Charles Sturt Benchmark Assessment 30/08/16 (70pp),
- Tree Canopy Cover Assessment Dec 2014 (87pp), Eco trails –Native gardens (3pp),
- Regulated and Significant trees (4pp), Tree and Streetscape Management Plans (62pp),
- Tree and Streetscape Policy (9pp), Residential Waste and Recycling Policy (9pp),
- Local native plants (1p), Gardening for native bees (2pp),
- Volunteer Code of Conduct Policy (6pp), Environmental Sustainability Policy (3pp),
- AdaptWest Western Adelaide Region Climate Change Adaptation Plan (126pp),
- AdaptWest Environment and Open Space Research Paper (79pp),

Energy and water efficiency 6 steps to a 6 star home (16pp),

Water Infrastructure Asset Management Plan (136pp), Open Space Strategy 2025 (95pp),

Residential Waste and Recycling Guidelines for new developments (61pp),

Open Space and Recreation Infrastructure Asset Management Plan (88pp).

All of these are relevant to planning but they give little information on actual progress or details on current works completed. The most valuable measures of progress are the KPIs in Appendix A which score progress. A few of these show significant improvements since 2014/15 including use of recycled water for irrigation, megalitres of water harvested and the number of understory plants planted on Council land. Some of this important monitoring is too new to detect trends but these are important initiatives and such monitoring is critical to reporting progress to staff, elected members and the community.

We note and applaud the new measure (2.2.16, page 11) to

“Investigate options for Council to encourage the sustainable design assessment of developments in the planning process”

However we also note that nowhere in the report is there mention of the use of **environmental impact statements**. These are a well recognised and essential policy tool for governments concerned with “creating the better environmental future” the Plan aims for (page 6). **We suggest that some form of EIS should be required for all Council policies and initiatives.**

**We also believe the community should be very concerned at the 84% increase in trees removed, with a 17% reduction in trees planted on Council land and a 79% reduction in understory plants planted in biodiversity sites.**

The Asset Management Committee Report that launched this community consultation contains the following list of enablers and barriers to implementation of the Living Green to 2020 Review. This is the only acknowledgement that there are forces within Council, businesses and the community that act to counter progress towards environmental sustainability and increased biodiversity.

#### **Enablers and barriers to implementation**

Some of the factors that have **enabled** Living Green actions include:

- devoting resources to the development of strategic direction to inform decision making;
- information sharing and collaboration, particularly at project planning stage;
- being aware of the challenges when bringing about change;
- leading and modelling behaviour that promotes environmental sustainability;
- having a common understanding of what constitutes success;
- support for continual learning and development;
- understanding of relevance and value of sustainability to communities and individuals;

- engaged communities; and
- leadership support and messaging about sustainability.

Some of the **barriers to success** that require further attention include:

- identifying and measuring environmental costs and benefits to inform decision making;
- clearly defining sustainability priorities and targets;
- identifying the risks that may lead to inaction;
- developing a long-term financial plan for sustainability; and
- reducing the lag time between business as usual and a new approach when change is required.

Future planning for implementation of Living Green to 2020 should prioritise actions that lead to process change to 'mainstream' sustainability, engage with our communities, and are supported by funding.

Actual reports that address each of the negative forces that act against the aims of Living Green to 2020 are needed. These must lead to actual plans to change or at least reduce these negative forces.

**The paradigm that growth is essential for prosperity must be challenged.** Urban infill is a simple example. Its many benefits including reducing urban spread and more efficiently addressing new infrastructure needs are accepted. However, the facts are that each time one lot becomes two, three or several; open space is lost, trees and garden space are removed, local infrastructure is stressed, street trees are threatened to provide access, parking space usage increases and the local heat island impacts increase. As such it is one of the most serious forces acting to prevent the biodiversity goals of Living Green to 2020 being progressed.

Diverse drivers encourage this urban infill. As well as complying with the State Government's urban plans, it increases the rate income for the Charles Sturt Council, is a local economic driver and allows home owners and investors to make a significant capital gain from each block sub-divided.

Any steps to limit the allowable amount of urban infill within residential suburbs will require significant changes to the City of Charles Sturt Development Plan and will meet with serious opposition from developers and many homeowners.

Many adverse attitudes impact negatively on trees within our city. Besides general community apathy; some consider the litter they produce a nuisance, their shade reduces the effectiveness of solar panel and reduces light. Their roots affect neighbours, footpaths, service installation and roads. Smaller blocks with reduced open area mean fewer trees will be planted in home gardens. Large and isolated trees over a certain size are protected as Regulated Trees or Significant Trees. Fewer species are protected if they are growing within 10 metres of a dwelling or in-ground swimming pool; *Agonis flexuosa* and all *Eucalyptus* species are the only large trees offered protection under the Development Act 1993. This is significant within the Charles Sturt Council area as many large street trees including Norfolk Island Pines, Red Flowering Gums (*Corymbia*

*ficifolia*) and large bottle brushes grow closer than 10m to houses but have no current protection. **The whole definition of Regulated Trees and Significant Trees within the Development Act and Council's policies needs to change to protect those that contribute to biodiversity and streetscape.**

In the draft many mentions are made of the need for understory plantings and the intent to provide these on both Council and private land. These are essential if we are going to increase the local biodiversity as correctly chosen species provide food, shelter and habitat requirements for native birds, lizards, butterflies, bees and many other beneficial insects. Quoting from Page 6 of the Draft Review:-

“The role of Council in supporting local environmental action is also addressed. This includes Council's role in supporting volunteers, responding to environmental views and perspectives, and advocating for other tiers of government to do the same. It also includes specific actions to help educate and encourage action of our residents on environmental issues of interest to them”.

Item 1.1.8 on Page 7 states “Review the involvement of residents in the shared care and establishment of young street trees, verges and other streetscape elements” From P13 of the Draft under Our Environment you stated “Council uses native plants extensively in formal and informal landscapes, in our reserves.....and has established a new biodiversity team of field staff that are trained and dedicated to maintain our biodiversity areas, in collaboration with volunteers”.

This action has the potential to make a big impact on biodiversity while serving to increase the awareness of native plant benefits within the community. The horticulture industry needs to be involved to promote the many native and improved flowering shrub cultivars that provide food for birds, bees and butterflies over an extended season. With climate change happening the old paradigm of just planting local indigenous plants should only apply to a few localities like the Tennyson Dunes and some stands on old golf courses. Landscapers need educating away from their use of a monoculture of leafy plants that is a recent fashion.

There are sections within the Development Act 1993 Charles Sturt Council can implement to protect the iconic Norfolk Island Pines and other significant stands of street trees within the western suburbs and WACRA would recommend doing this as a matter of urgency.

#### **Under section 23 Development Plans**

- (4) A Development Plan may designate a place as a place of local heritage value if—
  - (g) in the case of a tree (without limiting a preceding paragraph)—it is of special historical or social significance or importance within the local area.

Sub Section 23 (4a) is even more specific and should be applied throughout Henley and Grange to protect the large aged Norfolk Island Pines which are very healthy and approaching 100 years old.

- (4a) A Development Plan may—
- (a) declare a tree to be a significant tree if—
    - (i) it makes a significant contribution to the character or visual amenity of the local area; or
    - (ii) it is indigenous to the local area, it is a rare or endangered species taking into account any criteria prescribed by the regulations, or it forms part of a remnant area of native vegetation; or
    - (iii) it is an important habitat for native fauna taking into account any criteria prescribed by the regulations; or
    - (iv) it satisfies any criteria prescribed by the regulations; or
  - (b) declare a stand of trees to be significant trees if—
    - (i) as a group they make a significant contribution to the character or visual amenity of the local area; or
    - (ii) they are indigenous to the local area, they are members of a rare or endangered species taking into account any criteria prescribed by the regulations, or they form, or form part of, a remnant area of native vegetation; or
    - (iii) as a group they form an important habitat for native fauna taking into account any criteria prescribed by the regulations; or
    - (iv) as a group they satisfy any criteria prescribed by the regulations,

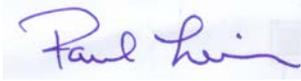
(and the declaration may be made on the basis that certain trees located at the same place are excluded from the relevant stand).
- (4b) However, a declaration under subsection (4a) must not be inconsistent with any criteria prescribed by the regulations for the purposes of this subsection.
- (4c) For the purposes of subsection (4a), a Development Plan must identify the location of a tree or stand of trees in accordance with any requirements imposed by the regulations.

Another tool Council can consider using that is not mentioned in the Draft is using i-Tree to place a dollar value on individual trees based on their age, size, canopy, health, rarity, local or heritage significance etc. Individual trees in the Waite Arboretum have values as high as \$45,000 according to a recent ABC Gardening Australia program. (i-Tree ECO Australia 2012 Workshops(8pp), and i-Tree ECO Australia User's Manual(20pp)).

Aquatic environments are another focus of the Review and WACRA notes that Council also employs staff with specialist wetland maintenance skills (Draft P13). Lobbying to have the stage 3 Breakout Creek Wetland is an issue WACRA fully supports as we have been lobbying for this for years to improve the river and reduce the discharge of sediment to the Gulf. With many new wetlands as well as existing creeks like Kirkcaldy Creek the cheapest and simplest tool to measure aquatic health is a dissolved Oxygen (DO) meter, does the City of Charles Sturt have one? Kirkcaldy Creek is an example of an unhealthy black water system with very low oxygen levels.

Lobbying to remove the pumping of water from the Pavilion building onto Henley Beach is another issue WACRA hopes Council continues to support.

WACRA trusts that our comments and suggestions will be noted and form part of the revised Living Green to 2020 final document and its replacement post 2020. If you have any queries or require further information, please contact Peter Schultz 0488 292 992, <envabc@adam.com.au>

A handwritten signature in blue ink that reads "Paul Laris". The signature is written in a cursive style with a blue background behind the text.

Paul Laris