



14 February 2025

Biodiversity Coordination Unit
Department for Environment and Water
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To whom it may concern,

Subject: South Australia's new Biodiversity Act

The Australian Institute of Landscape Architects, South Australian Chapter (AILA SA) extends its appreciation to the Department for Environment and Water to provide feedback on the proposal for South Australia's new Biodiversity Act

About AILA and AILA SA

The Australian Institute of Landscape Architects (AILA) is the peak national body for Landscape Architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship. We provide our members with training, recognition, and a community of practice to share knowledge, ideas, and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design and planning of the natural and built environment.

In operation since 1966, AILA represents over 3,200+ landscape architects and promotes excellence in planning, design and management for life outdoors. Committed to designing and creating better spaces in Australia, landscape architects have the skills and expertise to improve the nation's liveability through a unique approach to planning issues via innovative integrated solutions. In doing so, landscape architects contribute towards better environmental, social and economic outcomes for all Australians.

AILA SA leads a dynamic and respected profession, creating great places to support healthy communities and a sustainable planet. We work together to create healthy communities, connected urban green infrastructure, and liveable, sustainable cities and regions.

Our 3,200+ members are driven by [AILA's Strategic Plan](#) core values of which Climate Positive Design is a key driver. We are also committed to creating **'A greener, healthier, inclusive and climate resilient South Australia'** which is further embedded in our advocacy approach.

The work of South Australian landscape architects is recognised for creating liveable cities and sustainable design outcomes for everyone. Our 240+ South Australian members have helped shape many projects across the State, creating the vibrant community spaces for all.

Feedback on the South Australia Biodiversity Bill 2025, Draft for Comments

The Australian Institute of Landscape Architects, South Australian Chapter (AILA SA), appreciates the opportunity to review and provide further feedback on the **Draft Biodiversity Bill 2025**. We acknowledge the



significant progress made in embedding strong biodiversity protection mechanisms within the Bill, particularly the recognition of **First Nations' knowledge, biodiversity offsets, and the State Biodiversity Plan**. However, we note that some of our key recommendations, which we believe are vital to the Act's effectiveness, have not been incorporated into the draft legislation. We wish to reiterate these points for further consideration.

Recognised Recommendations in the Draft Bill

1. Recognition of First Nations' Knowledge in Biodiversity Management

- The Bill formally acknowledges **First Nations' perspectives** through the **First Nations Expert Biodiversity Committee (Sections 20-22)**.
- Section 10 mandates **seeking and applying First Nations' knowledge** in biodiversity policies and conservation plans ¹.

2. Inclusion of the State Biodiversity Plan

- Section 160 introduces a **State Biodiversity Plan**, which provides a structured approach to biodiversity conservation across the state ².

3. Biodiversity Offsets and the Mitigation Hierarchy

- The Bill includes a **mitigation hierarchy (Section 3(3))**, ensuring that biodiversity loss is avoided, minimised, restored, or offset ³.

Key Gaps in the Draft Bill & Further Recommendations

1. Absence of a Dedicated 'Greater Adelaide Region Biodiversity Management' Clause

- The **Bill lacks a dedicated section** addressing the management of biodiversity within the Greater Adelaide Region, despite **80% of South Australia's population** residing in this area⁴.
- Cities are biodiversity hotspots and require tailored **urban biodiversity planning strategies** to mitigate development impacts, improve ecological connectivity, and enhance resilience to climate change ⁵.
- We strongly recommend including a **specific clause within the Act** that outlines urban biodiversity management policies, or a hierarchy of policies and structures that deal with, plan, and design specific regulations and guidelines for urban environments, ensuring biodiversity is an integral part of land-use planning and infrastructure development in metropolitan areas.

¹ Australia's Strategy for Nature 2019–2030, Commonwealth of Australia (2019).

² Convention on Biological Diversity: text and annexes / Secretariat of the Convention on Biological Diversity.

³ Conference of the Parties to the Convention on Biological Diversity (2022). *Fifteenth meeting – Part II, Montreal, Canada*.

⁴ EPA (2018). *State of the Environment Report*. Environment Protection Authority, Government of South Australia.

⁵ Secretariat of the Convention on Biological Diversity (2012). *Cities and Biodiversity Outlook—Executive Summary*. Montreal.



This need is heightened by the increased private and public land development push to achieve the needed housing targets outlined in the SA Housing Roadmap.⁶

2. Lack of Legally Binding Urban Biodiversity Targets & Benchmarks

- The Draft Bill does not provide **clear targets or benchmarks** for improving biodiversity within urban settings.
- International best practices (e.g., **Urban Nature Index, IUCN Guidelines**^{7, 8, 9}) should be referenced to set enforceable standards for biodiversity in South Australia's urban and peri-urban areas.
- We recommend that the **State Biodiversity Plan (Section 160)** explicitly include **urban biodiversity indicators**, ensuring metropolitan regions contribute to the state's overall conservation goals. Simple percentages on overall numbers of protected species, or minimum desired increase in total numbers of a targeted species would be welcomed.

3. No Centralised Governance for Green Infrastructure & Urban Biodiversity

- While the Bill establishes the **Biodiversity Council**, it does not provide a **coordinating body** specifically for the planning, implementation, and regulation of **urban green infrastructure**¹⁰.
- We strongly recommend the establishment of a **dedicated agency** or unit within the Department for Environment and Water, responsible for **urban biodiversity conservation, green infrastructure, and ecological planning**.

4. Insufficient Focus on Urban Tree Canopy & Green Corridors

- The Bill lacks **explicit references to the protection and enhancement of urban tree canopies**, despite their critical role in **urban cooling, biodiversity conservation, and climate adaptation**^{11, 12}.
- There should be provisions for:
 - **Minimum urban tree canopy coverage targets** aligned with South Australia's Climate Action Plan.

⁶ Government of South Australia. (2024). *Housing roadmap*. Department for Housing and Urban Development. https://www.dhud.sa.gov.au/__data/assets/pdf_file/0008/1078586/HousingRoadmap.pdf

⁷ IUCN (2023). *The Urban Nature Indexes: Methodological Framework and Key Indicators*. Gland, Switzerland: IUCN and The Urban Biodiversity Hub (UBHub).

⁸ IUCN (2023). *Cities and Nature - Issues Brief*. October.

⁹ McNellie, M.J., Oliver, I., Dorrrough, J., Ferrier, S., Newell, G., & Gibbons, P. (2020). *Reference state and benchmark concepts for better biodiversity conservation in contemporary ecosystems*. Global Change Biology.

¹⁰ Conference of the Parties to the Convention on Biological Diversity (2018). *Fourteenth meeting, Sharm El-Sheikh, Egypt*.

¹¹ Kilbane, S. (2022). *Koalas, parrots, Frogs and Orchids Share Our Cities*. The Conversation.

¹² Soanes, K. & Lentini, P. (2019). *The 39 endangered species in Melbourne, Sydney, Adelaide and other Australian cities*. The Conversation.



- **Incentives for private landowners and developers** to integrate biodiversity-positive design into projects to support and strengthen the Planning and design code requirements.
- **Protection of green corridors and remnant vegetation** within urban landscapes.
- We urge the inclusion of **specific policies within the Biodiversity Plan (Section 160)** to ensure the ongoing health and expansion of Adelaide’s urban forest and green spaces.

Final Comments

While we commend the significant progress made in biodiversity conservation legislation, the current Draft Bill does not adequately reflect the **unique biodiversity challenges and opportunities within South Australia’s metropolitan areas**. The integration of urban biodiversity principles into the Act will ensure South Australia’s **largest population centres contribute positively to biodiversity conservation rather than act as biodiversity stressors**. Whilst South Australia is still a wild state, it is rapidly developing, increasing its urban population footprint and thus its impact on our cherish biodiversity.¹³

AILA SA remains committed to supporting the Department for Environment and Water in strengthening the Act’s provisions to ensure **urban and regional biodiversity is protected, enhanced, and sustained** for generations to come. We welcome the opportunity to discuss these recommendations further and collaborate on refining the Bill’s provisions.

We appreciate your consideration of our submission and look forward to engaging further on this critical issue.

Yours sincerely,

[Redacted signature]

[Redacted name]

[Redacted title]

¹³ Government of South Australia. (2024, February 29). *Planning reform to deliver new homes faster*. PlanSA. <https://plan.sa.gov.au/news/article/2024/planning-reform-to-deliver-new-homes-faster>