



20 February 2024

Biodiversity Coordination Unit
Department for Environment and Water
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South Australia's new Biodiversity Act

To whom it may concern,

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 South Australia

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 2,900+ 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 200+ South Australian members have helped shape many projects across the State, creating the vibrant community spaces for all.

AILA SA's advocacy

AILA advocates leading positions on issues of concern to our cities, suburbs and regions on matters regarding landscape architecture.

Our own Advocacy Manifesto, attached for your information, focuses on positive improvements to protecting, enhancing and creating a more sustainable and inclusive South Australia, including:

1. Creating a new, single, government agency to coordinate the planning, design, and delivery of South Australia's green infrastructure.
2. Protecting South Australia's Trees
3. Improving South Australia's connectivity by creating better streets for people.
4. A new approach to Designing on Country.

Feedback on the Developing a Biodiversity Act for South Australia Discussion paper

Our Executive team has reviewed the Discussion Paper and presents the recommendation below for consideration by the Department for Environment and Water:

Recommendation

A Clause to be added to the Upcoming Draft Biodiversity Bill - to be later enshrined as a Section of the Biodiversity Act- focused on 'Greater Adelaide Region Biodiversity Management'.



A strong clause will enable and focus the management of the city's major footprint on the State's Biodiversity and greatly enhance the possibility of achieving The Act's goals. This requires a focused and targeted planning and legislation of the metropolitan region impacts on and wealth of Biodiversity.

There is increased general awareness^{1 2 3} and studies⁴ that outline how cities, despite having large ecological footprints - such as Greater Adelaide - still pose a major threat to local Biodiversity^{5 6}. This includes metropolises which also harbor great urban ecosystems, with thriving biological diversities supporting many native and endangered species, some of which have larger populations, faster growth rates, and higher productivity than the surrounding ecosystems^{7 8}.

Despite this fact, minimal attention has been paid to the potentially beneficial targeted guidelines and legislation governing urban biodiversity inside and on the ever-changing interface between cities and their surroundings⁹.

There are multiple recorded Indexes^{10 11}, benchmarks, and methodologies^{12 13} identified as key data points and documents to help cities develop effective legislation to support urban and regional biodiversity

¹ Marinelli, J 2021, Urban Refuge: How Cities Can Help Solve the Biodiversity Crisis, Yale E360, viewed 14 February 2024, <<https://e360.yale.edu/features/urban-refuge-how-cities-can-help-solve-the-biodiversity-crisis>>.

² Ellerbeck, S 2022, These 4 cities are encouraging people to protect biodiversity. Here's how, World Economic Forum, viewed 14 February 2024, <<https://www.weforum.org/agenda/2022/11/biodiversity-cities-wildlife-nature/>>.

³ McDonald, R 2019, What We Know (And Don't Know) about Cities & Biodiversity, Cool Green Science, viewed 14 February 2024, <<https://blog.nature.org/2019/12/09/what-we-know-and-dont-know-about-cities-biodiversity/>>.

⁴ Erica N Spotswood, Erin E Beller, Robin Grossinger, J Letitia Grenier, Nicole E Heller, Myla F J Aronson, The Biological Deserts Fallacy: Cities in Their Landscapes Contribute More than We Think to Regional Biodiversity, BioScience, Volume 71, Issue 2, February 2021, Pages 148–160,

⁵ M. F. J. Aronson et al., "A global analysis of the impacts of urbanization on bird and plant diversity reveals key anthropogenic drivers," Proceedings of the Royal Society B: Biological Sciences, vol. 281, no. 1780, Apr. 2014.

⁶ McDonald, R.I., Mansur, A.V., Ascensão, F. et al. Research gaps in knowledge of the impact of urban growth on biodiversity. Nat Sustain 3, 16–24 (2020). <https://doi.org/10.1038/s41893-019-0436-6>

⁷ Kilbane, S 2022, Koalas, parrots, Frogs and Orchids Share Our cities. Their Fate Depends on Protecting Each one's habitat, Not Just 30% of All Land, The Conversation, viewed 14 February 2024, <<https://theconversation.com/koalas-parrots-frogs-and-orchids-share-our-cities-their-fate-depends-on-protecting-each-ones-habitat-not-just-30-of-all-land-192176>>.

⁸ Soanes, K & Lentini, P 2019, The 39 endangered species in Melbourne, Sydney, Adelaide and other Australian cities, The Conversation, viewed 14 February 2024, <<https://theconversation.com/the-39-endangered-species-in-melbourne-sydney-adelaide-and-other-australian-cities-114741>

⁹ Secretariat of the Convention on Biological Diversity (2012) Cities and Biodiversity Outlook—Executive Summary. Montreal, 16 pages.

¹⁰ IUCN (2023). The Urban Nature Indexes: Methodological framework and key indicators. Gland, Switzerland: IUCN and The Urban Biodiversity Hub (UBHub).

¹¹ Guerry, Anne D, Jeffrey R. Smith, Eric Lonsdorf, Gretchen C. Daily, Xueman Wang and Yuna Chun. 2021. "Urban Nature and Biodiversity for Cities." Policy Briefing. Global Platform for Sustainable Cities, World Bank. Washington, DC. © World Bank.

¹² McNellie MJ, Oliver I, Dorrrough J, Ferrier S, Newell G, Gibbons P. Reference state and benchmark concepts for better biodiversity conservation in contemporary ecosystems. Glob Change Biol. 2020; 26: 6702–6714. <https://doi.org/10.1111/gcb.15383>

¹³ McDonald, Robert & Colbert, M'Lisa & Hamann, Maike & Simkin, Rohan & Walsh, Brenna & Ascensão, Fernando & Barton, Melissa & Crossman, Katie & Edgecomb, Misty & Elmquist, Thomas & Gonzalez, Andrew & Güneralp, Burak & Haase, Dagmar & Hillel, Oliver & Huang, Kangning & Maddox, David & Mansur, Andressa & Paque, Joel & Pereira, Henrique & Sharp, Richard. (2018). Nature in the Urban Century: A global assessment of where and how to conserve nature for biodiversity and human wellbeing.



conservation, which also provide science-based platforms for incorporating biodiversity alongside other urban greening goals such as sustainable development and climate resiliency.

As roughly 80% of the State population lives in the Greater Adelaide Region, The Act should reference such best practices, and provide clear and targeted guidelines and legislation on how the future of our already rich urban biodiversity is to be managed to avoid negative impacts on its surrounding regional biodiversity¹⁴.

A targeted approach to legislation around Urban Biodiversity is well supported by international organizations¹⁵, Australian strategies^{16 17}, and local reports¹⁸, which outline Cities as key players on the management and healthiness of our national Biodiversity. An example of a targeted approach from the Conference of the Parties to The Convention on Biological Diversity includes:

*'TARGET 12 Significantly increase the area and quality, and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature, and contributing to inclusive and sustainable urbanization and to the provision of ecosystem functions and services.'*¹⁹

Our strategic and important recommendation is based on many years of active and positive advocacy from AILA and our members across Adelaide and South Australia.

We would welcome the opportunity to meet with your team to discuss our recommendations in more detail.

Yours sincerely,

Dr Janelle Arbon, Fellow (AILA), Registered Landscape Architect
President, AILA South Australian Chapter

¹⁴ IUCN 2023, Cities and Nature - Issues Brief, October, p. 2, viewed 14 February 2024, <<https://www.iucn.org/resources/issues-brief/cities-and-nature>>.

¹⁵ CONFERENCE OF THE PARTIES TO THE CONVENTION ON BIOLOGICAL DIVERSITY Fourteenth meeting Sharm El-Sheikh, Egypt, 17-29 November 2018

¹⁶ Australia's Strategy for Nature 2019–2030, Commonwealth of Australia 2019.

¹⁷ Convention on Biological Diversity : text and annexes / Secretariat of the Convention on Biological Diversity.

¹⁸ EPA (2018) State of the Environment Report. Environment Protection Authority, Government of South Australia [online] accessed 14/02/2024

¹⁹ CONFERENCE OF THE PARTIES TO THE CONVENTION ON BIOLOGICAL DIVERSITY Fifteenth meeting – Part II Montreal, Canada, 7-19 December 2022 Agenda item 9A.