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Green Adelaide
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Attention: Urban Greening Strategy Project Team

Submission to public consultation on draft Urban Greening Strategy

The City of Adelaide is pleased to provide a written submission to the consultation on the draft Urban Greening Strategy, A resilient and liveable Adelaide for all (the draft Strategy).

This submission is additional to my correspondence dated 17 May 2024 to Mr Brenton Gear regarding the draft Strategy.

The City of Adelaide considered a draft submission at its meeting on 9 July 2024 and resolved to provide the following high-level feedback on the draft Strategy:

- Commends Green Adelaide and the South Australian Government for acknowledging the importance of urban greening to achieve a resilient, protected, and sustainable future and outlining a collaborative approach to implementation.
- Supports the six priorities and three performance indicators contained in the draft Strategy which show strong alignment with the CoA Strategic Plan 2024-2028, Integrated Climate Strategy 2030, draft City Plan Adelaide 2036 and the City of Adelaide's submission to the Expert Panel on the State Government's Planning System Implementation Review.
- Supports definitions for urban greening, and the use of a spatial prioritisation tool to support evidence-based decision-making, as is consistent with the draft Adelaide Park Lands Management Strategy – Towards 2030, and the City of Adelaide's City Plan approach.
- Supports a long-term strategic approach and framework that captures the value creation of urban cooling, ecosystem services, culture, health and wellbeing etc.
- Supports collaboration with Karna Yerta Aboriginal Corporation and a partnership approach with Aboriginal and Torres Strait Islander people in delivering the Strategy.
- Seeks acknowledgement that contested landscapes, traffic demands, heritage areas, and building scales in the City of Adelaide represent a more unique set of circumstances for addressing urban greening in the CBD that requires a partnership between State and local government and the private sector.
- Requests stronger acknowledgement of the role of local open space to support growing residential populations across Greater Adelaide.

- Requests specific recognition of the ecological function of waterways and the River Torrens/ Karrawirra Pari for urban greening, biodiversity and climate resilience.
- Emphasises the importance of legislation and policy to protect and enforce greening measures, and the role the State's Planning and Development fund can play in urban greening in the City of Adelaide and the Adelaide Park Lands.

Please note that the Draft City Plan Adelaide 2036 and the draft Adelaide Park Lands Management Strategy – Towards 2030, mentioned above have both been endorsed by Council for the purpose of community consultation and can be accessed online:

- [Draft City Plan – Adelaide 2036](#)
- [Draft Adelaide Park Lands Management Strategy – Towards 2036 \(APLMS\)](#)

The City of Adelaide's submission is complemented by a detailed assessment and response to the public consultation materials under the six priority areas for action (enclosed).

Should you require further information regarding the submission, please contact Sarah Gilmour, Associate Director, Park Lands, Policy and Sustainability via s.gilmour@cityofadelaide.com.au.

Yours sincerely

Michael Sedgman
Acting Chief Executive Officer

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1. City of Adelaide Administrative response

Enclosure 1. City of Adelaide Administrative response

Public Consultation on draft Urban Greening Strategy, A resilient and liveable Adelaide for all (the draft Strategy)

The City of Adelaide’s (CoA’s) Administrative response is presented under the six priority areas for action in the draft Strategy, and the three performance indicators and target options outlined in the Discussion Paper. Comments are noted as being either **Support - Priority** (CoA encourages a focus on these actions in the draft Strategy), **Support – In Principle** (aligns with CoA planned activity, but no specific action planned by CoA) or **Change Requested** (CoA requests the action is amended).

Priority Area 1: Cooler and greener infill development

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
Policy and legislation better support urban greening and are in line with national best-practice	1.1 Strengthen tree protection legislation (and associated offset schemes) to align with best-practice and reflect the true value of existing trees	Submission to Planning System Implementation Review – Pathway to a climate ready future	Support – In Principle CoA acknowledges the recent changes to tree protection legislation and emphasises the need for continued and stronger tree protection to mitigate canopy loss and enhance green spaces on private property
	1.2 Review and refine the Urban Green Cover target (and policies) as part of the new Greater Adelaide Regional Plan	Strategic Plan 2024-28 - 40% tree canopy cover by 2035 Integrated Climate Strategy 2030 – A cool city with no urban heat island effect Draft City Plan, Adelaide 2036 – A greener and cooler city	Support – In Principle CoA has set a target of 40% tree canopy cover by 2035 CoA seeks to work with Green Adelaide on our strategic priority to develop a target to increase green spaces to support our environment
Developers and community have increased knowledge, motivation and capacity to practically and cost-effectively achieve greening, cooling and biodiversity outcomes	1.3 Monitor and enhance the Planning and Design Code and develop supporting tools to make it easier for developers to achieve, and go beyond, minimum requirements	Submission to Planning System Implementation Review – Pathway to a climate ready future City Plan, Code Amendment Program	Support - Priority CoA supports a review of the Urban Tree Canopy Overlay in the Planning and Design Code.

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
	1.4 Undertake coordinated metropolitan-wide campaigns (linked to incentives) targeted at improving urban greening outcomes	Integrated Climate Strategy 2030 – A net zero ready city	Support - Priority CoA has an established mechanism for incentivising sustainability by businesses and the community in the Sustainability Incentive Scheme which could be used to distribute funds for urban greening.
	1.5 Develop a catalogue of costed housing designs that showcase practical and affordable greening, WSUD and BSUD	Housing Strategy, Investing in Our Housing Future – Innovation and sustainability in housing	Support – In Principle CoA’s housing focus is an adaptive reuse (embodied carbon) and electrification
New developments include trees by adopting innovative and cost effective solutions	1.6 Work with the development sector to understand urban greening drivers and encourage innovation and adoption of best practice (including identifying effective incentives)	Draft City Plan, Adelaide 2036 – A greener and cooler city	Support – In Principle CoA has identified streets to be prioritised for greening of the public realm and through private development
	1.7 Develop best-practice engineering solutions, planting and maintenance techniques to minimise conflicts between green and grey infrastructure (building footings and infrastructure)	Strategic Plan 2024-28 - 40% tree canopy cover by 2035 Integrated Climate Strategy 2030 – A cool city with no urban heat island effect Draft City Plan, Adelaide 2036 – A greener and cooler city	Support – In Principle CoA has allocated \$5.7M in the draft 24/25 Annual Business Plan and Budget for urban greening and seeks to partner with the State Government to deliver greening in a highly contested urban environment.

Priority Area 2: Government leads by example

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
<p>Innovative and best-practice green and blue infrastructure is showcased in government infrastructure works and major projects</p>	<p>2.1 Integrate urban greening and WSUD as part of business-as-usual in government projects including:</p> <ul style="list-style-type: none"> • transport infrastructure upgrades, particularly roads with a high level of pedestrian and cyclist activity • major land releases • new schools and significant upgrades • SA Water assets • healthcare facilities • other government land 	<p>Integrated Climate Strategy 2030, A climate leading capital city council</p> <p>Priority: Climate change and sustainability are integrated into how we do business</p> <p>Integrated Climate Strategy 2030, A climate resilient city</p> <p>Priority: Greening supported by sustainable water resources</p> <p>Target: 20% of city stormwater drainage catchment is directed to WSUD green assets (159 ha)</p> <p>Target: 220 hectares of the Adelaide Park Lands are irrigated, and sustainable water increases to 95% for outdoor use</p> <p>Integrated Climate Strategy 2030, A city where nature thrives</p> <p>Priority: Biodiversity, native grasslands and woodlands are protected and enhanced</p> <p>Priority: Karrawirra Pari, waterways, Adelaide Park Lands, streets and squares act as arteries connecting our native species</p>	<p>Support - Priority</p> <p>CoA recognises the importance of all levels of government leading by example in urban greening and WSUD as standard practice</p>
	<p>2.2 State and local governments to deliver flagship greening, BSUD and WSUD projects that cross boundaries and set new benchmarks</p>		<p>Support - Priority</p> <p>CoA seeks a State-local partnership to improve the ecological function of the River Torrens/ Karrawirra Pari</p>
<p>Barriers to BSUD and WSUD are solved to accelerate implementation</p>	<p>2.3 Identify and implement solutions to key barriers to BSUD and WSUD in public infrastructure and projects, such as maintenance</p>		<p>Support - Priority</p> <p>CoA has a highly contested urban environment and there is a role for Green Adelaide to support negotiations with government and non-government utilities providers to achieve urban greening.</p>
	<p>2.4 Investigate alternative approaches to installing utilities infrastructure in roadways to create more space for trees</p>		

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
	2.5 Review restrictions on planting near utilities infrastructure, including permitted species lists		
Trees are appropriately valued as essential community assets that contribute to the wellbeing of our community and environment	2.6 Determine and apply an agreed method for applying economic valuations to trees and other green infrastructure	Kadaltilla / Adelaide Park Lands Authority Strategic Plan 2023-2028 Draft Adelaide Park Lands Management Strategy Towards 2036 Draft Economic Development Strategy National Heritage Management Plan for the Adelaide Park Lands	Support - Priority CoA seeks to partner with Green Adelaide on a methodology for capturing the economic, cultural, social and environmental values of the Adelaide Park Lands.
	2.7 Investigate including green infrastructure into public asset management systems and account for trees as appreciating assets	Asset Management Plans Long-term Financial Plan Integrated Climate Strategy 2030, A climate resilient city Priority: Homes and businesses are protected from climate hazards	Support - Priority CoA is establishing comprehensive asset management plans including for tree assets.

Priority Area 3: Building nature back in

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
More biodiversity net gain development	3.1 Investigate how the planning system and other government legislation could best facilitate biodiversity net gain development	Integrated Climate Strategy 2030, A city where nature thrives Priority: Biodiversity, native grasslands and woodlands are protected and enhanced	Support – In Principle
Increased motivation and capacity to undertake BSUD (government, council, developer and community)	3.2 Develop a BSUD capacity-building program, including design guidance, for the government, the development sectors and the community	Priority: Karrawirra Pari, waterways, Adelaide Park Lands, streets and squares act as arteries connecting our native species	Support – In Principle
	3.3 Develop a region-wide approach to supporting individuals and community groups to undertake biodiverse urban greening on private land, open space and schools, and/or verge planting along strategic corridors		Support – In Principle
Areas of valued native vegetation and critical habitat are protected	3.4 Map remnant vegetation and critical habitat, and spatially represent in the Greater Adelaide Regional Plan and the Planning and Design Code to minimise development impacts	Integrated Climate Strategy 2030, A city where nature thrives	Support – In Principle CoA completed a biodiversity survey of the Adelaide Park Lands in 2023/24 and encourages Green Adelaide to consider reconstructed vegetation communities in its planning of critical habitats in the urban environment

Priority Area 4: Future proofing our urban forest

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
Increased knowledge and availability of locally endemic and climate-resilient plant species	4.1 Develop up-to-date guidance to drive appropriate and climate-resilience species selection in a variety of contexts	Integrated Climate Strategy 2030 – A cool city with no urban heat island effect	<p>Support – In Principle</p> <p>CoA’s objectives include strengthening our relationship with research institutions and the Adelaide Botanic Gardens in our quest to be nature positive</p>
	4.2 Undertake trials to identify appropriate trees for Adelaide’s projected future climate	Integrated Climate Strategy 2030, A city where nature thrives	
	4.3 Investigate ways to increase the provision of local endemic and climate-resilient plant species and seed at scale	Draft City Plan, Adelaide 2036 – A greener and cooler city	<p>Support – In Principle</p> <p>CoA collects and propagates native seeds in its plant nursery</p>
Improved urban forest resilience and health	4.4 Identify and solve threats to the health of the urban forest from pests and diseases	Kadaltilla / Adelaide Park Lands Authority Strategic Plan 2023-2028	<p>Support - Priority</p> <p>Kadaltilla / Adelaide Park Lands Authority has identified as a priority initiative to undertake a climate impact assessment of the Adelaide Park Lands</p>
	4.5 Model future water demands for meeting greening targets and support greater use of WSUD and recycled water	Draft Adelaide Park Lands Management Strategy Towards 2036	<p>Support - Priority</p> <p>CoA with State Government support is undertaking a strategic water (irrigation demand) assessment in 2024/25</p>
Government, councils, developers and community motivation and capacity is increased	4.6 Scale up established WSUD capacity-building programs that are working well	<p>Integrated Climate Strategy 2030, A climate resilient city</p> <p>Priority: Greening supported by sustainable water resources</p> <p>Target: 20% of city stormwater drainage catchment is directed to WSUD green assets (159 ha)</p> <p>Target: 220 hectares of the Adelaide Park Lands are irrigated,</p>	<p>Support – In Principle</p>

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
		and sustainable water increases to 95% for outdoor use	

Priority Area 5: Improving greening equity

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
Urban greening investments are prioritised in areas of low greenery, high urban heat and high socio-economic disadvantage	5.1 Refine the Greening Prioritisation Pilot Study and consider the inclusion of additional datasets	City Plan - spatial mapping of urban heat and tree canopy Adelaide Park Lands Management Strategy – investment framework	<p>Change Requested</p> <p>CoA submits that high daily visitation and the primacy of the city centre and Adelaide Park Lands warrant prioritisation for urban greening investments.</p>
	5.2 Develop a greening prioritisation tool and investigate how it could be used in urban green investment decision-making, including relevant grants programs		
	5.3 Integrate urban heat mapping into the planning system and identify an appropriate policy response	Strategic Plan 2024-28 - 40% tree canopy cover by 2035 Integrated Climate Strategy 2030 – A cool city with no urban heat island effect Draft City Plan, Adelaide 2036 – A greener and cooler city	
Priority areas for new and/or improved green open space are identified	5.4 Prepare an open space strategy to identify priority areas for new or improved green open space and tree canopy	Adelaide Park Lands Management Strategy – provides a shared State-CoA approach to the Adelaide Park Lands and City Squares	<p>Support – In Principle</p> <p>CoA is providing information to Planning and Land Use Services through their open space strategy development for the Greater Adelaide Regional Plan; and as part of the CoA City Plan</p>
Locations for new feasible plantings are identified to expand the urban forest	5.5 Identify the potential locations of ‘new plantable space’ for trees	Strategic Plan 2024-28 - 40% tree canopy cover by 2035	<p>Support - Priority</p> <p>CoA has set a target of 40% tree canopy cover by 2035, and seeks</p>

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
		Integrated Climate Strategy 2030, A cool city with no urban heat island effect	to work with Green Adelaide on spatial mapping that identifies appropriate locations for urban tree canopy

Priority Area 6: Scaling up impact by working together

Draft Strategy Outcomes	Draft Strategy Actions	CoA Strategic Alignment	CoA Comments on draft Strategy
Roles and responsibilities are clear, learnings are shared, co-investment is optimised and cross sector challenges are addressed	6.1 Prepare an implementation plan to identify opportunities for greater coordination, efficiencies and impact	CoA strategies identify a partnership approach	Support – In Principle
	6.2 Investigate funding mechanisms for expanding urban greening, WSUD and BSUD delivery	Submission to Planning System Implementation Review – Pathway to a climate ready future	Support - Priority CoA supports use of the Planning and Development fund for investment in open space, public realm, pocket parks, tree canopy and the Adelaide Park Lands
Quality information, research and guidance to achieve urban greening is available to all	6.3 Develop an applied research pipeline to identify and fill knowledge gaps	Integrated Climate Strategy 2030, A city where nature thrives Priority: Biodiversity, native grasslands and woodlands are protected and enhanced Priority: Karrawirra Pari, waterways, Adelaide Park Lands, streets and squares act as arteries connecting our native species City Plan, Adelaide 2036	Support – In Principle CoA’s biodiversity survey of the Adelaide Park Lands in 2023/24 identified opportunities for future research partnerships to fill knowledge gaps CoA is establishing an increasing number of open datasets through the City Plan
	6.4 Develop a centralised hub to share knowledge across the region, between sectors and with the community		
	6.5 Extend the reach of established bridging organisations and networks that are working well		
Aboriginal wisdom is recognised and partnership opportunities are facilitated	6.6 Work with KYAC to identify opportunities for partnerships with Kaurna	Draft Stretch Reconciliation Action Plan 2024-27 Integrated Climate Strategy 2030, A city where nature thrives, Priority: Caring for Country in partnership with Kaurna Miyurna	Support - Priority CoA has an established process for engaging with KYAC as the cultural authority on Kaurna land and supports KYAC being resourced to develop a Caring for Country protocol across Greater Adelaide



Measuring Success

Draft Strategy Measures	CoA Comments on draft Measures
Increased tree canopy cover	<p>Support - Priority</p> <p>CoA supports regular LiDAR mapping to collect data and monitor tree canopy cover, with appropriate adjustments for the city environment and Adelaide Park Lands, and stratified canopy height as a separate metric to identify different vegetation layers.</p>
Greater tree species diversity	<p>Change requested</p> <p>CoA requests the tree species diversity indicator be expanded to include parks and reserves, state government roads, national parks and other land holdings and private land in addition to local government street trees</p>
Reduced urban heat intensity	<p>Change requested</p> <p>CoA supports additional measurement of urban heat intensity through vegetation assessment (in addition to measurement of surface temperature); and more frequent monitoring of urban heat.</p>
Other	<p>Change requested</p> <p>CoA requests consideration be given to additional performance measures that consider broad forms of greening, biodiversity and greening supported by sustainable water supplies</p>