

Our reference: ECM 858610 KR/MB

17 December 2025

Professor Chris Daniels
Presiding Member, Green Adelaide

Emailed: dew.greenadelaide@sa.gov.au and Chris.Daniels@sa.gov.au

Dear Professor Daniels

Submission on the draft Regional Landscape Plan 2026-2031

LGA welcomes the opportunity to provide a submission on the draft Regional Landscape Plan 2026-2031 (the Plan) and congratulates Green Adelaide on its efforts in preparing this document and releasing it for public consultation.

As the peak body proudly representing 68 councils across the state and the Anangu Pitjantjatjara Yankunytjatjara, we advocate on behalf of local government and aim to make a difference in the lives of South Australian communities.

We value our ongoing relationship with Green Adelaide and appreciate the funding opportunities which have been afforded the local government sector through Green Adelaide. We also thank you for including LGA as a member of the Urban Greening Leadership Group, represented by Katherine Russell, Manager Policy Projects.

Urban greening is an important issue to our members, and we have long been involved in efforts to improve Adelaide's green canopy, such as initiating Adelaide's tree canopy mapping and representing the local government sector at the SA Power Networks (SAPN) Vegetation Management Advisory Group. Green Adelaide supports the Regional Climate Partnerships which are a proven model for collaborative climate action across Adelaide.

Thank you for meeting with LGA staff about the Plan on Monday 15 December. Our feedback on the draft is outlined in this submission.

Recommendation 1: Collection of the landscape levy

LGA has long advocated for State Government to remove the responsibility from local councils to collect the landscape levy which helps fund Green Adelaide. LGA's position is that this state levy should be collected by a State Government agency such as Revenue SA. This position is reflected in LGA's 2026 [State Election Priorities](#). When the levy was first established, there may have been administrative efficiencies in leveraging council rating systems. These circumstances no longer apply. The existence of a dedicated, centralised

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state revenue collection framework means the current approach now represents an inefficient process. Collection of the levy shifts the burden on councils, introduces avoidable costs, and causes confusion to the ratepayer about why councils are collecting this tax and how it is spent. Transferring this responsibility to the State would improve transparency, reduce costs and better align accountability for a State-administered levy.

Recommendation 2: Importance of collaboration with partners

The Federal government-funded Climate Ready Alliances program is an example where state and local government work together to achieve greater outcomes and we thank you for your support of that program through representation on the project steering committee. Green Adelaide's support for this program will be highly influential in persuading decision-makers to provide ongoing funding support to build on the success of the Regional Climate Partnerships program.

In addition, support for LGA's proposal of a Local Government Coastal Adaptation Coordinator would greatly improve coastal adaptation measures along the metropolitan coast through a mechanism where state and local governments work together. This Coordinator role would liaise between both levels of government, provide technical advice to councils which are undertaking Coastal Hazard Adaptation Plans, and embed consistent coastal adaptation plans across the metropolitan region.

Recommendation 3: Adelaide Beach Management sand replenishment program

LGA questions the allocation of landscape levy funds to the Adelaide Beach Management sand replenishment management program, which is understood to be around \$3.5m each year. LGA is of the view that the landscape levy is to fund, in this case, Green Adelaide and its priorities (as per the *Landscape South Australia Act 2019* and the draft Regional Landscape Plan 2026-2031), not sand replenishment, which is a large component of this funding and does not address biodiversity and habitat.

Recommendation 4: Recognition of the algal bloom crisis

The Plan makes it clear that coast and marine is part of the remit of Green Adelaide, comprising 2114 km² of marine waters in Gulf St Vincent. Given the devastation the algal boom has caused to coastal and marine waters, LGA recommends this is acknowledged, together with the actions to manage the recovery of coastal and marine ecosystems over the medium to long term and the collaboration with local government that will be required to achieve that.

Recommendation 5: Stormwater management

The Plan acknowledges the impact of stormwater discharge as an ongoing challenge. LGA urges Green Adelaide to revisit the Resilient Water Futures plan and [Expert Panel on](#)

[Stormwater Management report](#) prepared by the Goyder Institute to guide the government's response to water management and embed strong action and investment in this issue.

Recommendation 6: Proactive interaction with SA Power Networks

As you mentioned at the Green Urban Futures Conference, the conflict between SAPN and its vegetation management program with the Green Adelaide urban greening agenda, is a significant barrier to state government policy (through the Urban Greening Strategy for Metropolitan Adelaide which targets 30 per cent tree canopy cover by 2055) and the efforts of Green Adelaide to achieve this target. This has the potential to derail all the progress which has been achieved in recent years.

LGA is actively seeking further information from SAPN about potential tree losses as a result of recent changes to their vegetation planting list. These losses stand to have a potentially significant impact on the green canopy and urban streetscape, and cause community angst. This is notwithstanding the practical replacement costs, which may attract a nominal replacement value in the order of \$670 per tree (including nurturing).

LGA is deeply concerned about the recent move by SAPN to target and potentially remove so called 'non-compliant' trees growing under, near or through powerlines. The approach proposed by SAPN, under the guise of 'legislative compliance' with the *Electricity Act 1996* (the Act) and the Electricity (Principles of Vegetation Clearance) Regulations 2021, is severely underdeveloped and has potential for significant adverse outcomes across the Adelaide metropolitan area over the coming generation.

The SAPN proposal shows a clear disregard for the work of councils to date in increasing greening efforts across metropolitan Adelaide since 2017 in compliance with vegetation guidelines at the time. Most significantly, LGA remains concerned:

- That SAPN has, to date and despite multiple requests, refused to provide to LGA or the SAPN-convened Vegetation Management Advisory Group the expected number of tree losses that will be captured by this revised policy position. This obfuscation prevents transparent analysis and advisory services to SAPN on the likely impacts of their changed approach towards so called non-compliant trees. It is thought that the number of trees captured by this policy position could be in the low thousands across the relevant identified area of metropolitan Adelaide
- The high likelihood of risk in inconsistent or perverse outcomes because SAPN is approaching councils individually to manage bespoke arrangements, rather than setting a clear framework and parameters for governance of the program and for it to be holistically rolled out in a coordinated fashion

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- The continued lack of influence from the Office of the Technical Regulator on this matter, where it appears largely content to allow SAPN to 'self-regulate' on this issue. This is despite the clear conflict between the Act and the 30 percent tree canopy target which is state government policy articulated under both the Urban Greening Strategy and the Greater Adelaide Regional Plan. This conflict requires urgent resolution and we strongly urge the State Government, within all related areas including through Green Adelaide, to continue to find ways to manage conflict of green and grey infrastructure for the benefit of South Australians and not be beholden to SAPN which is majority owned by a large off-shore company.

As you know, the Urban Greening Strategy has Action 2.5 to 'Address legislative barriers and other restrictions on planting near utilities infrastructure, including permitted species lists'. I am keen to understand how Green Adelaide proposes to address this issue, given the new SAPN approach to 'non-compliant' trees and our strong concerns raised above.

I see no action in the Plan to address this serious issue and encourage you to prioritise this.

Recommendation 7: Recognition of the role of councils

Local government is an important delivery partner in Green Adelaide's urban greening agenda, and I appreciate you recognising this at the recent University of Adelaide Green Urban Futures Conference, acknowledging that councils are doing the 'heavy lifting' in managing Adelaide's tree canopy.

I encourage you to recognise the role of councils in the Plan, and acknowledge their role as an important delivery partner. For example, the reference at page 18 to 'co-design approaches to coast and marine management' could specifically mention coastal councils as key stakeholders. This could apply throughout the Plan.

Recommendation 8: Improved consultation process

As there is an existing framework for contributing to the work of Green Adelaide through the Urban Greening Leadership Group, it seems a missed opportunity to not have discussed the Plan in that forum for discussion or input. I do not believe it was flagged as an upcoming project which would have been useful to understand the context for the public consultation now underway.

The tight 4-week turnaround for feedback is always a challenge for local government as councils meet monthly. We have been unable to consult directly with our member councils on this submission, and therefore base this submission on our ongoing and regular contact with our members on a range of urban greening and climate-related issues. We would be pleased to work with you closely on the release of further documents which affect councils directly to ensure their feedback can be incorporated.

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I welcome the opportunity to discuss the above comments and recommendations further with you and thank your team for meeting with my staff this week.

If you have any questions about this submission, please contact Katherine Russell at Katherine.russell@lga.sa.gov.au

We look forward to working with you on this important matter and making positive contributions to the urban greening of Adelaide.

Yours sincerely



Mayor Dr Heather Holmes-Ross

LGA President

Telephone: (08) 8224 2039

Email: lgapresident@lga.sa.gov.au

Copy to: Hon Lucy Hood, Minister for Environment and Water