



SUBMISSION BY INNER SOUTH CANBERRA COMMUNITY COUNCIL ON THE FRAMEWORK FOR AN ACT CLEAN ECONOMY STRATEGY

Introduction

The Inner South Canberra Community Council (ISCCC) was established earlier in 2010 with the primary aim of representing and promoting the interests of Inner South Canberra.

In this submission on the ACT Clean Economy Strategy, the ISCCC will focus on those aspects of the Strategy that are relevant to current key areas of interest and concern to Inner South residents, in particular urban planning and development. The ISCCC committee has not had time to canvas this submission within the active member associations and through them the broader Inner South community, and other members of the Council.

The ISCCC looks forward to cooperating with the ACT Government in developing a strategy in the Inner South that both supports the transition to a clean economy and more sustainable community, as well as ensuring a continued high quality of life and amenity for Inner South residents.

What do we mean by a “clean economy”?

The University of Canberra (UC) report *Framework for an Australian Capital Territory Clean Economy Strategy* links a clean economy to the drive towards sustainable development.

A good working definition of sustainable development comes from the landmark Brundtland Commission Report *Our Common Future* which defined it as “meeting the needs of the present without compromising the ability of future generations to meet their own needs” (World Commission on Environment and Development, 1987).

The UC report indicates that this and other definitions of sustainable development have in common one or more of the following principles:

- The balanced integration of economic, social and environmental systems;
- Recognition that the world’s natural resources are finite;
- Caution in the face of high risk and uncertainty in irreversible decisions;
- Inclusion and engagement of all stakeholders;
- Ensuring intergenerational equity.

Within that broad context, the UC report says that the term “clean economy” encompasses sentiments aimed at replacing dependence on fossil fuels and other non-renewable resources with strategies that encourage retention, growth and attraction of businesses and industries. This orientation would create products and services that directly or indirectly reduce environmental impact.¹

What are the main sources of the ACT’s greenhouse gas emissions?

As indicated in the UC report, the ACT’s greenhouse gas emissions are due primarily to heavy consumption of electricity (and gas) to heat, cool and light our buildings (72.2%) followed by the use of motor vehicles (22.8%).

Much of the recent increase in ACT electricity use in the ACT has been in the commercial sector. Total non-residential electricity consumption has increased by 16.3% since 2001-02 while electricity consumption per residential customer has decreased by 1.3% over the same period.² However, while consumption per residential customer may have decreased, the total energy consumption has the potential to continue rising as population increases. As noted by Inner South resident David Denham in his submission on the Clean Economy Strategy, total ACT greenhouse gas emissions increased by 29% from about 3.5 million tonnes in 1990 to about 4.5 million tonnes in 2005. In the same period the population of the ACT increased 17% from about 282,900 to about 331,000 (see ABS data in series 3101.0 Australian Demographic Statistics).

What are possible priorities in the Inner South?

i) Reducing energy use in commercial office space

It would be interesting to be able to disaggregate electricity use in Canberra by area. Such an analysis may well confirm that a significant proportion of commercial electricity use occurs in commercial office space in the Inner South, which is largely occupied by federal government agencies.

We would expect that Government agencies have well-developed plans for improving energy efficiency, but wonder if there is any evidence available on the effectiveness of these plans. Clearly, it is preferable to improve energy efficiency first, and then provide incentives for a switch to renewable energy sources to meet other energy needs. The ACT Government’s decision to extend the Feed-in tariff to commercial scale solar installations will hopefully lead to take-up that will serve to reduce greenhouse gas emissions.

Suggested action: Enhance cooperation between the ACT Government and the Commonwealth agencies and other major occupiers of commercial office space to assess the scope for further greenhouse gas emission reductions. This cooperation needs to be supported by appropriate legislation at all levels of government.

¹ University of Canberra, Framework for an Australian Capital Territory Clean Economy Strategy: Economic, Environmental and Social Aspects, September 2010, page 6.

² UC report, 2010, page 4.

ii) **Reducing residential energy use**

To reduce residential greenhouse gas emissions, it is important to distinguish between what can be done in existing residential areas, and how emissions can be minimized in new residential areas.

New residential areas

New residential developments in areas such as Kingston Foreshore and the proposed East Lake development should meet high-energy efficiency standards and embrace solar passive design, and should have easy access to high frequency public transport services. We understand that the proposed East Lake development has been designed to achieve a high level of energy and water use efficiency, and look forward to seeing this being achieved in practice.

Suggested action: The Inner South Canberra Community Council would like to continue its participation in the East Lake reference group or any other successor body that has a monitoring role in relation to the East Lake development. Again, the aspirations which are being espoused for these and other proposed developments need to be supported by legislation which is binding on all government bodies and the private sector, in anticipation of Territory Plan Variations and subsequent development applications.

Existing residential areas

For existing residential areas also, any proposed redevelopments should comply with legislated high-energy efficiency and solar passive design requirements. There should continue to be incentives for retrofitting existing dwellings to make them more energy efficient, including through the ACT Government-funded Home Energy Advice Team, and the feed-in tariff for solar installations.

As indicated in the Old Narrabundah Community Council's recent submission on Draft Variation 303 to the Territory Plan, we are concerned about the proposed removal from the new building Code of existing provisions requiring new dwellings to have a minimum of 3 hours of solar access to the living areas between 9am and 3pm in mid-winter. In the experience of the Old Narrabundah Community Council, the 3 hour minimum Rule has been crucial, when it comes to AAT appeals, to ensure all proposed new units being built in Narrabundah are provided with good orientation and a minimum amount of northerly sun in the middle of a Canberra Winter.

The argument that all new dwellings and multi units have to comply with minimum star ratings in the building codes is inadequate as the Building Code of Australia's energy rating system will not necessarily ensure that a minimum 3hrs access to winter sunshine is provided. Canberra is a city uniquely located in a climate zone that experiences extreme temperatures in both summer and winter. In this regard the Building Code of Australia is not necessarily responsive to Canberra's needs. We can provide examples of units in multi-unit developments facing entirely south that have been stamped as achieving a 5 star energy rating. The proposition that the new Territory Plan be changed to allow units that will not see the winter sun to be approved is an unjustifiable planning policy change.

Suggested action: The ISCCC agrees with the proposal in Draft Variation 303 to the Territory Plan that “good solar access” be added to the Residential Zone Objectives for all residential zones, and that an energy rating equivalent to at least an average of 6 stars, with a minimum of 5 stars be required for all buildings. At the same time, the Territory Plan should retain the current requirement that a minimum of 3hrs access to winter sunshine be provided.

iii) Addressing barriers to higher public transport use and ensuring high frequency services for new urban developments such as East Lake

In preparing this submission, we were planning to seek statistics on traffic flows to and from the Inner South, given that many public servants work in the many Government Departments located in this area. In that context, it is very timely that the National Capital Authority (NCA) has just released a study on that subject. According to a Canberra Times article on 9 November 2010, the study has found that only a tiny proportion, maybe 5 or 6 per cent, of the public servants working in the Parliamentary Triangle use public transport to get to work. Clearly, there is a lot of scope for improvement in public transport use and it is heartening to see that the NCA has established an online discussion forum on its website to seek public views on this issue. Perhaps this could be complemented later by an online survey to test different options with those employed in the Parliamentary Triangle.

Similarly, it is important to ensure that new developments such as East Lake have well-developed public transport strategies able to cope with the anticipated increase in traffic along major transport corridors such as Wentworth Avenue, Bowen Drive and Canberra Avenue.

Suggested action: That an evidence-based strategy, based on quantitative and qualitative data on current and projected traffic flows, and a survey of potential users of public transport and pedestrian/cycling transport modes, be developed to overcome identified barriers to the provision and use of public transport and walking/cycling in the Parliamentary Triangle.

iv) Maximising water use efficiency

Quite apart from the challenge of reducing greenhouse gas emissions, an important aspect of a clean economy and broader sustainability is water use efficiency. While 2010 has been a high rainfall year, long-term projections indicate that Canberra will have a drier climate in future, which will require an even greater focus on water use efficiency. The recent history of water use in the ACT shows there has been significant behaviour change. While the population of Canberra increased from about 220,000 to 352,000 between 1978 and 2009, the per capita water consumption decreased from about 300 to about 150 kilolitres per year.³ Even so, the growing Canberra population will make water security an ongoing concern.

Suggested action: Mandate water-sensitive urban and building design to minimise use of town and ground water, maintain healthy groundwater levels, and maximise water quality in Canberra’s lakes and rivers.

³ Drawn from the submission to the Clean Energy Strategy by David Denham, who cited <http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/3218.02008-09?OpenDocument>

Suggested action: Examine any international and/or national precedents for, and the costs/benefits of, introducing water meters for individual unit holders in multi-unit developments to facilitate their capacity to monitor their water use.

v) Avoiding the heat island effect in summer by protecting private and urban open space and the urban forest

Private and urban open space that can support a thriving urban forest can significantly reduce the heat island effect in Canberra in summer and thereby reduce energy use associated with air conditioners.

As suggested in the recent SEE-Change Inner South submission on Draft Variation 303 to the Territory Plan, there should be specific and adequate requirements in the building code for permeable surfaces and space to allow for vegetation canopy and root development. The recent submission of the Griffith-Narrabundah Residents' Association on Draft Variation 303 also referred to this issue. It pointed out that the proposed Multi Unit Housing Development Code, Part A General Controls, Element 3: Building and site controls, Rules 7 to 9 inclusive, state that the maximum plot ratio for Residential 2 Zone is 50%, for Residential Zone 3 is 65% and Residential Zone 4 is 80%.

The increasing proportion of hard surfaces in building redevelopments, including increasing plot ratios, and approval of multi-unit developments on small blocks, will make it difficult to ensure adequate permeable surfaces and space for vegetation that provides climate modification and amenity. It will also threaten the garden city character of Canberra.

Suggested action: Remove the 50% plot ratio for single dwellings in suburban areas (RZ1 zone) and replace with a sliding scale plot ratio dependent on the size of the block in question, in particular in areas of Territorial Significance. Retain the 35% plot ratio for dual occupancies in suburban areas. (Note: Unit titling not allowed in suburban areas) Retain existing maximum plot ratios in RZ2.

vi) Waste management and recycling

Critical to the development of a clean economy is the effective management of waste and greater incentives for “reducing, reusing and recycling” waste.

While great strides have been made in the ACT in recycling in the past 15 years, there is still significant scope for further action.

Suggested action: That a strategy be developed to:

1. Encourage greater participation in recycling;
2. Facilitate greater recycling of organic waste, batteries, chemicals, whitegoods and e-waste;
3. Enforce the requirement for adequate garbage and recycling facilities for multi unit developments and commercial premises;

4. Enforce ongoing checks of waste, including contaminated waste, from building sites throughout the city and require higher levels of recycling from these sites.

Conclusion

The Inner South Canberra Community Council has addressed only a small subset of the many issues raised in the University of Canberra report, focusing mainly on those issues of interest in recent times to Inner South Canberra residents. We would be pleased to elaborate on this submission further if needed and to participate in any further community consultations held as the ACT Government fleshes out its Clean Economy Strategy.

Inner South Canberra Community Council
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