



Draft Climate Change Adaptation Strategy
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DRAFT ACT CLIMATE CHANGE ADAPTATION STRATEGY

Introduction

The Inner South Canberra Community Council (ISCCC) welcomes the opportunity to comment on the Draft ACT Climate Change Adaptation Strategy (DACTCCAS).

The ISCCC commends the work the ACT Government has done to significantly reduce greenhouse gas emissions through the ACT Climate Change Strategy and subsequent Action Plans, and recognises that climate change requires an urgent, comprehensive and determined approach to adaptation.

The ACT has been fortunate so far in enjoying various benefits such as adequate water supply, a living green landscape and a relatively mild climate. This has allowed us to adapt at a reasonable pace to reduce greenhouse gas emissions. The community has also been able to adapt to other environmental and financial/budgetary constraints in the short-term which has unfortunately had the perverse effect of contributing to the delay in the perceived need to address climate change adaptation. Within this perception, the Government has unfortunately facilitated too many practices that work against climate change adaptation. Now, as is well documented, the need to adapt to factors beyond our control has become critical and urgent.

While recognising the DACTCCAS is a strategy, the ISCCC is concerned that like so many other strategies, it reads well with reference to higher-level matters but the detail is too often disappointing in that the global aspirations can still be applied to a myriad of undesirable individual practices.

Funding is critical in achieving the actions of the final strategy. Without some indication of estimated funding levels and commitment from Government there is a risk that community consultation is an academic exercise.

The principle of 'no regrets', page 3, is welcome and needs to be foremost in all planning for climate change adaptation.

The ISCCC endorses much of the DACTCCAS, but is of the view that more needs to be done to embed adaptation measures into general and specific planning, education and how the Government conducts business. For too long, and too often, planning has been too much of a piecemeal approach, captive to one thing or another and rarely, if ever, resulting in any exemplars of good practices that includes elements such as aesthetics and addressing requirements holistically.

For example, buildings and other infrastructure have been encouraged with little or no architectural input, little or no consideration of the impacts for water management, no sense of a 'place' (where there are easily accessible public spaces that encourage community interaction and activity, 'place' scale shops and similar services all of which are aimed at encouraging community activity in positive ways) and little or no integration with road and transport networks in a strategic manner. Collectively, these challenges will make climate change adaptation difficult. While some achievements are shown in the DACTCCAS, they are possibly 'one offs' but should be typical of development in the city.

There is a risk that the tension in the ACT between dealing with climate change adaptation and pursuing population growth through urban densification will put pressure on government to take a less urgent approach than is necessary. Currently the two aspirations seem to be incompatible. Unless this issue is properly addressed it will be difficult to encourage the community to make its own adaptations.

The following comments are influenced by the experience of what has occurred in the Inner South but may well apply Canberra-wide.

Suggestions to improve the DACTCCAS text

1. The rationale for having to develop an adaptation strategy for global warming should be made more strongly at the beginning of the summary pamphlet, in line with the main document.

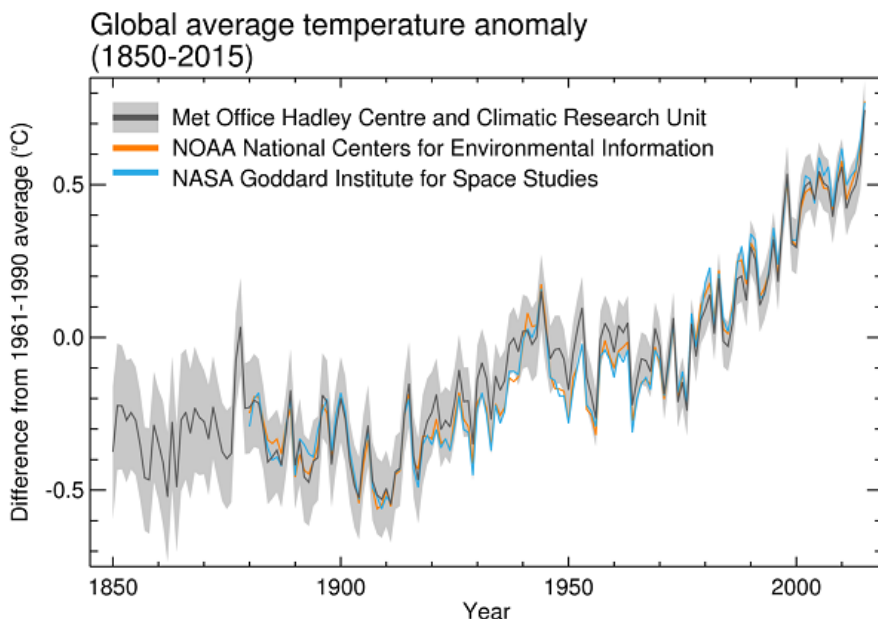
For example, we suggest:

'Our climate is warming at an unprecedented rate, largely as a result of human activity and is already 1°C higher than it was 100 years ago. 2015 was the hottest year since records began. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, and sea level has risen. These changes are having and will have widespread impacts on human and natural systems.

In Canberra and the surrounding..... ' (as per the draft strategy summary).

2. In Figure 9 on page 18, there is no reference to the NARClIM document, on which the figures in the table are based. It is not clear what 'near future' and 'far future' are: these should be defined.
3. It appears that the baseline for the numbers is based on the years 1990-2009. The table should be amended to make the changes consistent with Figure 15 on page 30, where the warming numbers refer to pre-industrial temperatures, i.e. 1850-1900. (see the diagram below).

4. The 1990-2009 baseline is a poor choice because the temperatures are changing rapidly during this period and it is not compatible with many other global studies. It should be noted that the agreement reached at the 2015 United Nations Climate Change Conference in Paris, uses a pre-industrial baseline.
5. Figure 10 on page 19 shows the changes in annual heating and cooling energy requirements for a standard Canberra house but there should also be a reference to the actual annual energy requirements so that the changes can quickly be assessed as a percentage of the average current usage.



Detail

22 priority short-term adaptation actions, page 5

The DACTCCAS includes, in Actions by end 2017, the item to ‘introduce requirements to planning for new estates and urban renewal in Territory Plan and sub-division guidelines and design standards to ensure climate change adaptation considerations in planning discussions’. Only needing these requirements to be included in ‘discussions’ is unsatisfactory – mandatory rules need to be applied. Also, having the requirements only for new estates and urban renewal means there is a risk that this will be too little, too late. The requirements should be considered for application at lower / smaller levels of development such as any new buildings.

Sector 2

The priority short-term climate adaptation actions need to be strengthened to better reflect the Desired Outcomes, page 40.

In general, the ISCCC would like to see more strategic use of the precinct code facility to assist the community in understanding the method and determination of the Government to pursue this strategy. The current system of apparent ad hoc infill and post facto precinct code development does not enable a sensible approach to an integrated and holistic approach to development in the context of climate change adaptation.

There are numerous examples of this in the inner South, and elsewhere. For example:

- There is a brief mention of urban open space on page 38 but does not provide any guidance as to what 'actively managing green space' means and even the most minimal 'management of green space' could be stated to have met this criterion. The need for urban open space is not well understood or managed in the context of its importance to the wellbeing of the community. Standards and measurements need to be established to define just how much urban open space should be mandated in any given area to support wildlife and community use. This would also ensure that current open spaces are not decreased bit by bit until nothing useful is left.
- P39, 'Such social cohesion is a marker of community wellbeing and an effective measure of resilience. The provision of facilities and services, education and even the design of urban Canberra can contribute to fostering social interaction. Achieving the Government's priority for a caring community that helps the vulnerable with fairness and equity is the best way to ensure the Canberra community maintains resilience to extreme events.' Too many 'spot' developments, mainly residential, preclude consideration of including this social cohesion.
- Housing adaptability needs to be strengthened to enable continuity of use, ageing in place, fewer knockdown-rebuilds and less waste.

Waste management needs to be highlighted. While there is a Waste Management Strategy and the ACT Waste Feasibility Study is underway, the Commissioner for the Environment has stated that 'consumerism' and the consequential environmental footprint, is the major sustainability issue. This element also needs to be addressed. In this context, better resourcing is needed to ensure that regulation of the building industry ensures existing and new measures are complied with. This will reduce incidents involving re-work which is a highly resource consuming and waste activity.

More informed consideration needs to be given to the type of non stand-alone residences that are most energy efficient; for example, multi-unit apartment buildings which have a lower land footprint but which are arguably less energy efficient than townhouses.

Sector 3

The narrative in this Sector is generally supported but is, again, at odds with the ongoing development of bland and uninspiring buildings, minimal open spaces and minimal space for any green infrastructure.

The reference to Climate-wise buildings, page 42, requires some clarification of the example of gutter size. Any building that is surrounded by non-porous surfaces will need larger or better rainwater collection systems. Buildings surrounded by porous surfaces may be better with no gutters. The ISCCC is concerned that the practice of building residences which cover a large proportion of the block and which have practically no porous areas will become a significant problem with ingress and overflow.

Similarly, the practice of building residences which depend year round on air-conditioning will be impossible to change until the building is demolished. There does not seem to be a community 'mood' to forego this convenience.

Page 42 – it would be helpful to use other wording (the 'albedo effect') in the header as the reader is left wondering, through the next two paragraphs, what this means and what is its relevance.

Page 49 – Potential risks and impacts. The words 'but the Government is considering raising construction standards at the urban edge' should be deleted as it does not describe a risk nor an impact.

The ISCCC welcomes the proposed action of introducing requirements to planning for new estates and urban renewal by 2017 and would like to see this happen sooner, or at least early in 2017. All new developments should be required to adopt designs that enable trees to be grown and provide solar access all-year round to the inhabitants.

In addition to the proposed actions for Sustainable Procurement the Government should consider raising awareness amongst those in the community who are buying residences and investing in landscapes, so that they can demand better results. For example, house buyers could have educational resources to understand what they are buying and how it relates to better practice and the benefits of a smaller built footprint that enables more living infrastructure. Otherwise purchasers will make do with what is available and this may often be what is cheaper in the short run rather than what is more cost-effective and resilient to the impacts of climate change in the long run.

The document correctly states that well-chosen deciduous trees provide better shade than eucalyptus trees. The government could progressively replace the eucalyptus trees along street verges with deciduous trees and plant more eucalypts in urban parks.

The definition of plot ratio should be changed so that the areas of permeable land on each residential block are large enough to allow trees to grow. The government should also provide strong incentives to home-owners to grow plants that will contribute to climate change adaptation.

The government should provide practical standards for building materials so that builders and architects can easily adopt high standards for both thermal and acoustic insulation.

Sector 4 Water

The ISCCC recognises and supports the work the Government has initiated on the ACT Water Strategy, Water Sensitive Urban Design. The ISCCC urges the Government to continue working towards the desired outcomes.

Sector 5

The Government needs to determine the extent to which it will allow natural resources to degrade or become extinct. While the actions to ameliorate change are appreciated there is a dire lack of resources, particularly funding and people, in this sector. For example, kangaroo populations, feral pests and weeds are really only dealt with at the critical level and a strategic approach must be articulated and funded.

3.1 Integration

Awareness and information:

The ISCCC encourages ongoing, more informative and more active education to develop the community's awareness of the need for climate change adaptation. On page 13 of the DACTCCAS notes one of the adaptation barriers as 'insufficient or inadequate information on climate change impacts for households, businesses, other organisations and governments to make well-informed adaptation decisions.' This is a critical issue and should not be underestimated.

Also, 'Community awareness of climate impacts needs to be high to inform and promote individual and collective activity actions by everyone to increase population resilience' is identified on page 40 as an Emerging issue and residual risk and needs to be a focus for education programs.

The integration actions need a more active approach. While websites such as ACTsmart are reasonably practical, they do require an awareness that they exist. Also, there does not seem to be a co-ordinated resource for climate change adaptation, although this may be part of the proposed actions.

As noted in the proposed action 'sustained promotion and engagement efforts' will be essential. While acknowledging there is a high level of awareness that climate change is occurring, there is probably insufficient understanding of the urgency and insufficient information on climate change impacts for households, businesses, other organisations and governments to make well-informed adaptation decisions.

Members of the community may also be passive about adaptation – for example if one can financially afford to maintain a high environmental footprint there may be little incentive to change. Just as switching to non-car transport modes is encouraged by lack of parking availability/affordability and improved pedestrian and cycle routes, so may adaptation be encouraged by some forms of penalties and more exemplars of what the community might aspire to.

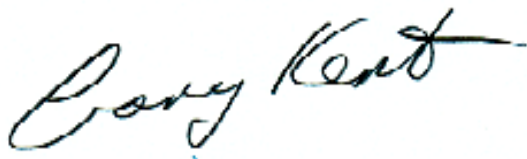
The government will need to do more to increase the community's concern about climate change. As is well demonstrated the awareness of climate change has been a long and slow process and while it may be accepted in the ACT, the detail is probably poorly understood by the general community. Excellent communicators such as Professor Will Steffen are needed to bring this issue to the community level.

The reduction of greenhouse gas emissions has been largely achieved by government actions, with a high level of acceptance by the community such as the 10% of ACT households that now have photovoltaics. However, while one arm of government promotes climate change mitigation and adaptation, other arms of government are approving development that works against achieving such outcomes.

It will be difficult for the Government to deal with climate change adaptation in the same way as climate change mitigation given the degree of development of the city and the difficulty of retrofitting and other significant changes to infrastructure etc. The government must now take a genuine whole-of-government approach, in particular in relation to urban planning and development, and in providing the community with the information and tools to assist them with climate change adaptation.

The ISCCC looks forward to the further development of the DACTCCAS and will be happy to contribute to further discussions.

Yours sincerely

A handwritten signature in black ink that reads "Gary Kent". The signature is written in a cursive, flowing style.

Gary Kent
Chair

3 April 2016