

Barriers to Effective Climate Change Adaptation  
Productivity Commission  
LB2 Collins Street East  
**MELBOURNE VIC 3003**

8 June 2012

Dear Commissioners,

Please find below a submission from the City of Vincent on the *Barriers to Effective Climate Change Adaptation* draft report (April 2012).

## **CONTEXT**

### **Location and nature of the City of Vincent**

The City of Vincent is an inner city council bordering the City of Perth municipality. With a population of around 31,000 residents, it is primarily residential, without a coastline and has limited river frontage. Being a well-established inner-city area, all new development in the city involves in-fill or redevelopment of existing sites.

### **Approach to climate change risk assessment and adaptation**

In 2011-2012 the City completed a Climate Risk Assessment and Adaptation Analysis (final report yet to be endorsed by Council). Under the guidance of climate risk consultants and in partnership with another local government authority and a local planning authority, the City followed the Australian Government's climate change risk assessment framework outlined in *Climate Change Impacts and Risk Management: A guide for business and government* (AGO, 2007) to undertake a two-phased approach:

- Phase 1: A broad strategic assessment of climate change impacts across all Council asset and service areas, designed to gain a better understanding of expected climate change impacts within the City's administrative boundaries;

Given the highly developed nature of the study area, buildings were found to be involved in climate change impacts across a range of asset and service areas and were therefore identified as the focus for phase 2:

- Phase 2: A targeted risk assessment and adaptation analysis focused on assessing the risks posed by climate change to existing and future buildings (and their users), and identifying effective adaptation options to mitigate these risks.

The climate change scenarios applied in this study were based on national (CSIRO/BoM, 2007) and international (IPCC, 2007) literature, and these were projected out to 2030 and 2070, which were found to be appropriate medium to long-term development timelines.

## **COMMENTS**

The City of Vincent finds itself in general agreement with the findings of the Productivity Commission and supports the recommendations set out in the draft report on the barriers to effective climate change.

Like other Australian Local Government Authorities, the City has found:

- Significant gaps in the information relating to climate change impacts at the local and regional scale, and finds itself lacking the resources needed to fill all relevant gaps;

- Lack of clarity around the roles, responsibilities and legal liability of local government with regard to adaptation planning. This leaves question marks over responsibility for some identified adaptation measures;
- Uncertainty around legal liability for local government with respect to climate change adaptation, leading to it seeking independent legal advice to clarify its position;
- A significant number of identified adaptation measures fall clearly within the remit of state or federal governments, leaving local authorities with power only to advocate for their implementation; and
- A further number of adaptation measures require partnership between local authorities and state government bodies, again leaving local government with an advocacy role in trying to obtain state government cooperation.

The City has also found:

- Clear benefits to be gained from collaboration and resource sharing with other local authorities in the undertaking of Climate Risk and Adaptation assessments; however
- Studies that incorporate multiple partner organisations will by necessity produce more generalised high-level outcomes, requiring further work within individual organisations to deliver tangible and implementable adaptation options.

In light of the above findings, the City of Vincent particularly supports draft recommendations 7.1 and 7.2, relating to roles/responsibilities and legal liability of local governments. Clear definition of these areas would provide certainty around responsibility for adaptation measures and allow local governments to proceed with adaptation planning with better understanding of their legal position.

Additionally, the City supports draft recommendations 8.1, 8.2 and 8.3 relating to planning and building regulations and agrees with the productivity commission on the need for:

- A revision of land-use planning systems to incorporate climate change risks;
- Incorporation of measures to address climate change impacts in the National Construction Codes; and
- Establishing appropriate responses to climate change risk to existing settlements.

We must point out that the City of Vincent identified a number of climate change risks that are more immediate and of higher priority to its operations and to its community than sea/river level rise and associated flooding/erosion events. These were:

- Severe water shortages and associated reductions in liveability/amenity and increased costs;
- Higher average and extreme temperatures and prolonged heat waves, resulting in reduced liveability/amenity, health impacts and rising costs; and
- Increasingly severe storm events, resulting in localised flooding, associated erosion and reduced accessibility/damage to buildings. This problem is likely to be compounded by rapidly increasing urban density atop an outdated drainage infrastructure.

Therefore, while current state and federal level work relating to climate change adaptation appears largely focused on coastal risk, we must point to these and other significant risks associated with a changing climate that are faced by local authorities. The City of Vincent would like to see more consideration given to these risks in the development of new adaptation and land-use planning frameworks and in building codes and regulations.