



11 April 2024

National Adaptation Policy Office
Climate Adaption Policy
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

By email: climate.adaptation@dcceew.gov.au

Dear National Adaptation Policy Office

Submission: National Adaptation Plan Issues Paper

The National Growth Areas Alliance (NGAA) welcomes the opportunity to respond to the National Adaptation Plan Issues Paper (Issues Paper) and first pass risk assessment.

The NGAA is the peak body for local governments in Australia's outer metropolitan growth areas and advocates to state and federal governments on growth area challenges and opportunities. Together, we represent more than five million people living in Australia's fast-growing suburbs and are united by shared experiences of population growth rates at double the national average and long-term under-investment in vital infrastructure.

Geographically, Australia's growth areas are located on the edge of Australia's major cities and were designated for future urban growth when they were established up to twenty years ago. These areas now comprise established urban centres and urban areas under development, as well as regional townships and agricultural land. Indeed, some of the NGAA Member Councils straddle the metropolitan and regional boundary.

We take an evidence-based approach, with a Policy Platform built on the foundations of our comprehensive research strategy. We also help to develop Alliance Councils' capacity to deliver good growth through best practice case studies, policy discussions, and extensive networks.

The NGAA acknowledges the time and resources the Australian Government is investing in developing a comprehensive national adaptation policy that is well-targeted and effective. We understand the National Adaptation Plan will be the blueprint for adapting to nationally significant climate risks and will be based on both scientific evidence and extensive consultation.

We agree that adaptation is a critical component of the longer-term response to climate change and that it is essential to increasing Australia's capacity to anticipate and respond successfully to climate change. The position that this includes taking action to reduce climate risk, strengthen resilience and enhance well-being is aligned with the 2023-2024 NGAA Policy Platform.

Issues such as increasing canopy cover to provide a cool place to go during a heatwave, or maintaining essential functions such as transport systems during a severe storm, are all directly relevant to the NGAA Member Councils given Australia's growth areas are disproportionately impacted by extreme

weather events as a result of climate change. In the past year alone Australia’s growth areas have experienced bushfires, storms, floods, and record heatwaves, and these councils have been responsible for coordinating emergency responses for their community.

We therefore urge the Australian Government to engage directly with growth area councils as the policy and adaptation plan develop.

Overarching Feedback

The NGAA is supportive of the approach that the National Adaptation Plan will not replace or duplicate more detailed adaptation plans for other levels of government, sectors, or systems. The NGAA Member Councils are already working on detailed policies and plans to progress climate change adaptation for their communities as outlined in the case study below.

Case Study: Measures to address extreme heat in Western Sydney

Turn Down the Heat

The combined impact of the geographic features (and lack of sea breeze) and development patterns over the past two decades has created an urban heat island effect in Western Sydney. Western Sydney can be 10 degrees hotter than central Sydney during extreme heat events, and has recently recorded temperatures of up to 50 degrees.

In response, the Western Sydney Regional Organisation of Councils (WSROC) developed the Turn Down the Heat Strategy to complement existing policies and strategies to create local, practical and coordinated action in the short, medium and long term. It aims to build on existing efforts and looks to advance the recognition that urban heat is a priority regional issue in Western Sydney.

Turn Down the Heat seeks to go beyond the focus of current approaches on the internal environment (for example, BASIX, energy star ratings) and emergency response (Heatwave response plans) to bring together the many new approaches to our external environments that are being developed by a range of stakeholders from a diverse range of sectors including health, infrastructure, academia, planning, utilities and non-profit.

Turn Down the Heat is also working with local and state government to prioritise urban heat as a first order consideration in development planning including integrating urban heat objectives into local planning documents and advocating to State Government to work closely with local Governments to review the overall planning system in order to achieve better outcomes on the ground.

The Wilton Growth Area Development Control Plan

An example of integrating urban heat island considerations into relevant planning schemes is the Wilton Development Control Plan (DCP). The Wilton DCP was adopted in 2021 and applies to land within the South East Wilton and North Wilton Precincts within the Wilton Growth Area in south western Sydney. This requires all development within this area to comply with the DCP prior to council granting consent for development.

The DCP seeks to achieve an efficient and environmentally sensitive development outcome within the Wilton Growth Area. The objectives of the DCP include:

- * New communities are planned and developed in an orderly, integrated and environmentally sustainable manner through Neighbourhood Plans; and
- * New developments are planned and constructed to contribute to the social, environmental and economic sustainability of Wilton and surrounds, recognise the unique landscape and aesthetic qualities of Wilton, and promote landscape-oriented development and best practice outcomes.

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In response to the recent data demonstrating the impacts of consumer preferences for dark coloured external walls and roofs on the urban heat island effect, the DCP seeks to:

- * Increase tree canopy cover by mandating that new developments include a stated number of trees and that vegetation be prioritised in public spaces to achieve a target of 40% tree canopy;
- * Improve standards for backyard sizes so there is room for tree canopy and mandate tree canopy where blocks are a threshold size;
- * Mandate lighter colour palettes and light coloured roofs.

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We are also aware of significant work being carried out by many NGAA Member Councils relating to disaster management planning and welcome the advice that the National Adaptation Plan will complement this work.

Foundations for a National Adaptation Plan

Draft Vision and Objectives

In this context, we support the draft vision that Australia's economy, society and natural and built environments are being managed and invested in, to reduce climate impacts and harness any opportunities now and into the future by all levels of government, business and community.

We also agree with the key objectives of the plan that seek to mainstream adaptation action, drive an uplift in private sector investment and establish support for people and communities in disproportionately vulnerable situations.

Prioritising Adaptation Actions

In general, the NGAA supports the approach that considers possible future adaptation pathways when planning new communities, noting that this approach might result in a potential future hazard being avoided, rather than needing to accommodate or adapt in the future.

In this context, we consistently advocate for the position that **new communities should not be established in areas that are identified as being high risk of extreme weather events as a result of climate change.**

We also generally support the draft principles for prioritising and sequencing adaptation actions. We support the final principle (outlined below), noting that the populations of Australia's growth areas are likely to be in a group that will be disproportionately affected by climate change. Residents in Australia's growth areas are younger, and are more likely to live in larger family households than all of Australia. Growth area populations are culturally diverse and have a lower than average SEIFA index indicating socio-economic disadvantage, as well as comprising higher First Nations populations than the greater capital city metropolitan areas.

- *assist groups who are disproportionately affected by climate impacts and ensure that adaptation addresses equity and human rights, such as gender-responsive adaptation, intergenerational equity and equity for people with a disability.*

Further, we consider that the groups who are disproportionately affected by climate impacts may in fact be **geographical**, such as Australia's growth areas.

Climate Risks and Adaptation Actions

National Climate Risk Assessment- Priority Risks

The NGAA supports the National Climate Risk Assessment that seeks to deliver the first national level assessment of how climate change puts what we value at risk, now and in the future.

Overall, we support the approach that adaptation should be place-based, community-led and values-driven so that it is embedded in the geographic area and specific community it responds to. We agree that these approaches must actively involve local communities and First Nations peoples.

Of the subset of 11 priority risks for further analysis in the second pass assessment, we note the following are particularly relevant to Australia's growth areas and the communities who live in these areas:

- Natural environment - Risks to aquatic and terrestrial ecosystem condition and function or landscape function and collapse including through species loss and extinction.
- Regional and remote communities - Risks to regional, remote and First Nations communities that are supported by natural environments and ecosystem services.

We note that all of Australia's growth area municipalities comprise areas and townships that would be considered regional, and have more in common with regional centres than the respective city. As growth areas transition from regional to urban, we suggest that they be considered in both the urban and regional categories.

- Health and social support - Risks to health and wellbeing from slow onset and extreme climate impacts.
- Infrastructure and built environment - Risks to critical infrastructure that impact access to essential services.
- Defence and national security - Risks to domestic disaster response and recovery assistance from the competing need to respond to multiple natural hazard events as well as national security contingencies, resulting in concurrency pressures and overwhelming the government's capacity to respond effectively.
- Cross system - Communities and settlement - Risks to communities from legacy-and-future planning and decision-making that increases the vulnerability of settlements.
- Cross system - Water security - Risks to water security that underpin community resilience, natural environments, water-dependant industries and cultural heritage.
- Cross system - Governance - Risk to adaptation from maladaptation and inaction from governance structures not fit to address changing climate risks.

Given the majority of the priority risks that are being analysed further have a direct impact on Australia's growth areas, we urge the Australian Government to engage directly with NGAA Member Councils as the National Adaptation Plan develops.

A Closer Look at Risks and Actions - Infrastructure and Built Environment System

The NGAA agrees that climate change has many direct and indirect impacts on the networks of human-made structures across Australia through changes which drive a variety of risks to this system, ranging from individual dwellings through to entire supply and service chains with local, regional, national and international implications. We are already seeing the impacts of climate change on the communities in Australia's growth areas as a result of extreme weather events.

We support mainstreaming and strengthening adaptation in the infrastructure and built environment system through embedding climate risks and adaptation planning in land use planning policies, construction policies and building codes. Decisions around the location of new assets would incorporate future climate scenarios and managing material climate risks would be a part of business as usual, with decisions underpinned by high quality, useable climate information.

All of this is directly relevant to growth area councils given they will be implementing the policies through the planning approvals process for new developments as well as being responsible for a range of infrastructure assets such as roads, libraries, recreation centres and other community infrastructure. Again, we urge the Australian Government to engage with growth area councils as the policies and plan develop.

Nationally Significant Climate Risks

We also support the categorisation of the Nationally significant climate risks as outlined in the Appendix (Risk Descriptions) to National Climate Risk Assessment – First Pass Assessment Report. The climate risk categories below are directly relevant to Australia's growth area communities:

- **Natural environment** - The natural environment system refers to Australia's ecosystems, biodiversity, and natural processes. This system includes the ocean around Australia (covering the Exclusive Economic Zone and sub-Antarctic islands), coastal areas and shorelines, as well as the natural environment that is not part of urban or agricultural zones (with some overlap), such as national parks, rangelands, grasslands, forests and bushland and other natural landscapes. Australia has diverse natural environments across regions and states or territories. Plans and adaptations also vary geographically across jurisdictions.

The natural environment system underpins all other systems and has strongest interdependencies with the primary industries and food, regional and remote communities and First Nations values and knowledges systems.

- **Regional and remote communities** - The regional and remote communities system refers to all (natural, social, economic, and built) aspects of communities in Australia that are beyond major urban centres. This system includes regional centres, towns, remote communities, mining settlements, small islands and external territories.

This system has strongest interdependencies with the natural environment and First Nations values and knowledges systems.

- **Health and social support** - The health and social support system refers to population health and wellbeing, as well as the provision, availability, and access to health, wellbeing and social services. This system includes services that encompass healthcare, public and preventative health, aged care, disability services, housing support, employment and financial wellbeing and their supporting infrastructure.

This system has strongest interdependencies with the regional and remote communities, infrastructure and built environment and First Nations values and knowledges systems.

- Infrastructure and built environment - The infrastructure and built environment system refers to the intricate networks of human-made structures across Australia. This system includes physical buildings, green and blue spaces, and their supporting infrastructure such as transport, water, and energy systems.

This system has strongest interdependencies with the primary industries and food, regional and remote communities and economy, trade and finance systems.

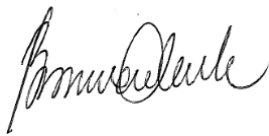
- Defence and national security - The defence and national security system refers to the structures and functions dedicated to safeguarding Australia's domestic stability and international interests, including disaster readiness and risk reduction. This system includes all emergency management services, workforce and volunteers, defence operations and their workforce, particularly with respect to the role of the military in disaster response or geopolitical tensions arising from extreme events.

This system has strongest interdependencies with the health and social support, economy, trade and finance and infrastructure and built environment systems.

Contact

The NGAA welcomes the opportunity to respond to the Issues Paper and provide the growth areas perspective on the National Adaptation Plan. Should you wish to discuss any of the matters raised in this response, please contact Caroline Speed, National Research and Policy Lead, on caroline.speed@ngaa.org.au.

Yours faithfully



Bronwen Clark
Executive Officer
National Growth Areas Alliance