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National Adaptation Policy Office – Climate Adaptation Policy
Submitted via climate.adaptation@dcceew.gov.au

To Whom It May Concern

National Adaptation Plan Issues Paper Response

The Australian Sustainable Built Environment Council (ASBEC) welcomes the opportunity to make a submission to the Australian Government's consultation on the National Adaptation Plan Issues Paper.

ASBEC is a collaborative forum of peak bodies in the Australian built environment, focused on sustainable, productive, and resilient buildings, communities, and cities. Our [membership](#)ⁱ consists of industry associations, professional bodies, academia, non-government organisations and government observers who are involved in the planning, design, delivery, and operation of our built environment. We have long called for a strategic approach to climate change adaptation and risk management to ensure that Australia is prepared to respond to the challenges of climate change and ensure the nation's ongoing prosperity and social viability beyond the 21st century.

Australia's built environment must be at the heart of climate change adaptation efforts.

Australia is already experiencing the impacts of climate change and is increasingly exposed to disasters caused by natural hazards that impact infrastructure, essential services and communities.

In addition to buildings, the built environment is also the spaces around buildings, including constructed landscapes such as plazas, streetscapes, parks, gardens, playgrounds, and sports facilities. These spaces constitute a significant part of urban environments in Australia. Concreted, sealed surfaces contribute to the urban heat island effect. The sealing of surfaces has implications for both carbon emissions and microclimate regulation.

Our built environment is not currently equipped to withstand future climate conditions that are already 'baked in,' leading to heightened risks for buildings and occupants. Population density within Australia is increasing generally, with concentrations emerging in areas prone to natural hazards, particularly coastal areas.

Around 80% of Australia's population lives within 50km of the coast and 25% of Australia's population growth is within 3km of the coastline. These population centres are exposed to some of the most damaging extreme weather events, such as tropical cyclones, storm surges, hailstorms, and coastal river flooding. More property in these areas means a higher cost of damage from natural hazard-triggered disasters as the effects of climate change increase and intensify over time.

The built environment has a crucial role to play in protecting the health and comfort of all Australians in the context of a changing climate. Buildings that have a poor thermal performance put occupants at higher risk of heat and cold stress. Buildings with poor energy efficiency also put increased pressure on grid stability.

Poor quality of building performance embedded within current minimum standards of construction do little to place environmental considerations on the operational aspects of buildings. This operational performance could be enhanced through appropriate consideration of the public realm as a starting point. These considerations should include building location with the site to better connect to surrounding sites and open space to create networks, corridors, and contiguous planting to help mitigate wind, urban heat island, and create permeability, habitat, shelter etc.



Many of the actions required to make Australia's buildings more climate resilient are also intrinsically linked to emissions reduction efforts.

Many of the medium- and long-term impacts of climate change are already locked in due to anthropogenic increases of greenhouse gases in the atmosphere. Australia is already experiencing more extreme weather events as a result, with increases in frequency and severity over time. The built environment is not currently equipped to withstand future climate conditions potentially leading to heightened risks for buildings and occupants.

Buildings constructed today will remain in use for decades and must therefore be designed to deliver increased resilience to more frequent and severe extreme weather and preserve the safety of occupants. In addition, efforts must be made to retrofit existing buildings to be more resilient to climate change.

Given this, a national adaptation plan that includes plans for a climate resilient built environment is an essential component of the Australian Government's commitment to deliver a national framework for climate change adaptation across the economy. Additionally, the integration of constructed urban landscapes into the National Adaptation Plan is crucial for a holistic approach to climate change adaptation, ensuring that our adaptation strategies encompass all aspects of the built environment and not just the buildings themselves.

The absence to date of a comprehensive national policy framework and supporting actions to mitigate and adapt to the impacts of climate change has manifested in many ways across Australia's built environment:

- a lack of national, comprehensive data and mapping has undermined understanding of natural hazard risk by governments and the community. This has contributed to poor planning decisions leading to property development in areas of significant risk
- inappropriate building design and construction in the past has been widespread, leading to a built environment susceptible to increased levels of risk
- local, state and territory and federal governments have not invested adequately in strategic disaster mitigation initiatives and infrastructure, and
- inconsistent application of compliance measures with the sustainability and energy efficiency provisions in the National Construction Code may result in housing not meeting current minimum expectations of energy performance.

We acknowledge the work the Australian Government has undertaken to date to improve both climate resilience and emissions reduction in the built environment (as detailed on page 23 of the Issues Paper). We commend the Government on this work, plus the development of this National Adaptation Plan, which is rightly based on evidence and advice from the National Climate Risk Assessment process.

An effective National Adaptation Plan requires coordination across portfolios and all levels of government to ensure a comprehensive response to establishing a climate resilient built environment. The plan needs to encompass a range of measures that establish best practice technical requirements for building construction to ensure occupant safety and preserve buildings (where appropriate and cost effective) in the face of our changing climate. Initially, a nationally agreed set of future climate scenario data is required to determine structural and resilience requirements in new buildings. This dataset should be used to underpin a comprehensive framework of scheduled updates to regulation, targeted retrofits and land-use planning requirements.ⁱⁱ

While much of this is mooted in the Issues Paper and is a positive move, greater ambition and more comprehensive action will be needed to bolster the resilience of our existing buildings to withstand the impact of climate change economically and physically, while successfully transitioning the economy to net-zero.

There is a unique opportunity within the built environment to both dramatically reduce carbon emissions and embed climate resilience in highly cost-effective ways that will also stimulate the economy. The built environment has the technology to decarbonise now, but we must do this at speed and scale to smooth the way for other hard-to-abate sectors and achieve Australia's legislated emission reduction targets.

We look forward to an ongoing collaborative relationship with the Australian Government in the delivery of the National Adaptation Plan and the built environment measures flagged in the Issues Paper. We welcome the opportunity to work collaboratively to ensure a well-adapted Australia, where new and existing buildings and infrastructure are more resilient to the impacts of climate change and adaptation is mainstreamed and strengthened across the economy.

If you have any further queries, please do not hesitate to contact me via alison.scotland@asbec.asn.au or on 0409 157 112.

Yours sincerely



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ⁱ https://www.asbec.asn.au/membership/current_members/

ⁱⁱ <https://everybuildingcounts.com.au/wp-content/uploads/sites/37/2023/04/Every-Building-Counts-2023-Edition.pdf>