Dear Sir/Madam,

Re: AILA Response to the Productivity Commission Draft Report (April 2012) - “Barriers to Effective Climate Adaptation”

The Australian Institute of Landscape Architects (AILA) congratulates the Productivity Commission on the production of the above Draft Report and appreciates the opportunity to comment on it.

The AILA is the peak professional body for Landscape Architects in Australia. Founded in 1966, the Institute currently represents the interests of approximately 3,000 landscape architects throughout the nation. The profession is committed to the creation of meaningful and enjoyable outdoor places and to the sustainable management of our built and natural environment.

AILA’s response is structured in relation to the key recommendations in the Draft Report, as follows:

Assessing Reforms and Setting Priorities: Draft Recommendation 4.1 - “Reforms to address barriers to effective risk management in the current climate should be implemented without delay, where they are likely to deliver net benefits.”

This recommendation aligns directly with priority areas of AILA’s research, advocacy and policy development efforts - including the need identified within the Commonwealth Government’s National Urban Policy\(^1\) for increased support and investment in strategic design and management of ‘green infrastructure’\(^2\) assets for delivering more productive, sustainable and liveable cities.

International legislation and planning initiatives recognise that urban green infrastructure is one of the most effective tools available for managing climate-change related environmental risks such as flooding and heatwaves. Governments in the UK, Singapore, USA and other nations are increasingly seeking to use green infrastructure to drive economic growth and regeneration and improve public health, wellbeing and quality of life.

AILA notes that Recommendation 4.1 provides multiple opportunities to unlock historic barriers to provision of more climate-responsive land management and settlement design outcomes that should include:


\(^2\) The term ‘green infrastructure’ describes the network of natural landscape assets which underpin the economic, socio-cultural and environmental functionality of our cities and towns – i.e. the green spaces and water systems which intersperse, connect and provide vital life support for humans and other species within our urban environments. Green infrastructure is fundamentally different from other aspects of built infrastructure in that it has the unique, inherent capacity to enhance and regenerate natural resources, rather than simply minimize the damage to environmental systems. http://www.aila.org.au/greeninfrastructure/
1. Focus on the potential to boost productivity options by seeking to realize gains from previously disregarded assets. In particular - Australia’s urban and regional green infrastructure asset base, and its contribution to improved climate adaptation as well as integrated health, transport, energy, water, biodiversity, housing and waste outcomes. Best practice approaches for unlocking the full productivity potential of green infrastructure - i.e. via landscape planning, design, management and monitoring processes - will require a focus on ecosystem services provisioning and delivery, as well as examining potential reform of infrastructure assessment and pricing mechanisms.

2. Supporting development of business case studies for green infrastructure systems and employment opportunities at national, regional and local level. These would need to tie in with relevant green economy strategies and plans, and incorporate baseline accounting of existing green infrastructure assets and potential. The new draft Australian Standard DR AS 5334 - Climate Change Adaptation for Settlements and Infrastructure is one mechanism for driving reform of infrastructure planning & assessment in this regard.

3. Development of policy frameworks that support integrated design and management of green infrastructure/landscape assets across urban and regional scales for improved adaptation outcomes.

4. Institutional and regulatory re-structuring to enable strategic planning and development of green infrastructure networks to effectively bridge and/or dissolve current jurisdictional and institutional boundaries.

5. Fostering cultural change within & between governance organizations in recognition that overall adaptive response capacity is highly dependent on the degree of co-ordination between legislative & governance arrangements relating to the built environment, in particular - i.e. between high-level sustainability goals and subsequent flow-on of those objectives through successive stages of planning policy and processes.

6. Development of a National Ecosystem Services Framework and state-based Integrated Planning and Settlement Design Strategies to support landscape management and planning decisions for improved adaptation outcomes.
Building Adaptive Capacity: Draft Recommendation 5.1 - “Australian governments should implement policies that help the community deal with the current climate by improving the flexibility of the economy.”

AILA supports this recommendation, and notes that initiatives such as the current government carbon price could be further extended to assist the development of innovative funding mechanisms for investing in green infrastructure provision, including planning, design and management of green infrastructure assets.

Recent international initiatives such as the UK Government’s Green Investment Bank\(^3\) could also provide useful models for encouraging investment in improved environmental resource management outcomes.

Efforts to improve labour and capital productivity by facilitating economic activity should also provided incentives to incorporate the contribution of green infrastructure to the emerging green economy - through education & knowledge transfer as well as ‘green’ collar jobs & service industries to support increased green infrastructure capacity.

Current adaptation policy and programs have a strong focus on cost-minimisation - especially as it becomes increasingly obvious to decision-makers that not all impacts will be avoidable. In this situation, investors will look at green infrastructure in terms of operational costs, tenant demand and ability of buildings and sites to provide future-proofing against environmental and social changes. Research indicates that green infrastructure may provide a longer development life cycle, with a reduced requirement for redevelopment and lower risk of obsolescence\(^4\).

Information Provision: Draft Recommendation 6.1
AILA supports the acknowledgement in this recommendation of the key role of Government in supporting the development, co-ordination and dissemination of high-quality information on climate change risks and responses. Through research carried out on behalf of the Commonwealth Department of Climate Change and Energy Efficiency\(^5\), AILA has identified an urgent need to build and support more direct links between research and built environment design practice to inform urban landscape design and planning approaches for climate adaptation.

To this end, AILA has continued to develop strong and productive relationships with the CSIRO, NCCARF and allied research institutions, as key providers of high-quality research and advice on climate adaptation and policy development relevant to the needs of landscape architects and urban design professionals.

\(^3\) See http://www.bis.gov.uk/greeninvestmentbank
The Institute regards ongoing government support and investment in adaptation research as a vital public service to sustain local, regional and national productivity:

“It is widely accepted in Australia and internationally that public investment in research plays a significant role in building innovation capacity and driving productivity. In Australia’s case in particular, the OECD has identified that public and private research and development exert significant effects on our national productivity” (2011 Strategic Roadmap for Australian Research Infrastructure - DIISR)

Local Government & Planning & Building Regulation: Draft Recommendations 7.1, 8.1, 8.2 & 8.3
AILA supports the Productivity Commission’s efforts to improve assistance to local governments to enable them to design and deliver more effective climate adaptation responses.

The Institute also wishes to see the above recommendations drive an increased focus in future strategic planning policy and regulations on investigation of the costs and benefits of using green infrastructure approaches to address mitigation and adaptation to climate change, while also addressing the protection and connectivity of ecosystems, and the provision of ecosystem services to support national productivity and sustainability goals.

Green infrastructure contributes to minimising natural disaster risks, - e.g. by using ecosystem-based approaches for coastal protection through wetlands/flood plain restoration rather than construction of sea-walls and other non-regenerative ‘hard’ infrastructure.

It also promotes integrated spatial planning via identifying multifunctional zones and promoting incorporation of habitat restoration measures and other connectivity elements into various land-use plans and policies, such as linking peri-urban and urban areas, or in marine spatial planning policy.

Its ultimate aim is contributing to the development of a greener and more sustainable economy by investing in ecosystem-based approaches delivering multiple benefits in addition to technical solutions, and mitigating adverse effects of transport and energy infrastructure.  

The Role of Insurance & Reform Priorities: Draft Recommendations 12.1, 12.2, 12.3 & 13.1

There are a number of broad based reforms which could offer potential benefits for facilitating adaptation to climate change, in tandem with supporting broader sustainable settlement objectives. These include the National Water reform, amendments to the Environment Protection and Biodiversity Act, the National Urban Policy, the Sustainable Population Strategy and the National Plan for Environmental Information.

The Australian Government (at local, state and national levels) owns and manages a large portfolio of assets at risk from climate change impacts. It has a responsibility to demonstrate leadership in the management of such assets to provide the most cost-effective and socially equitable solutions for building environmental resilience to support future generations of Australians.

AILA considers that the government is currently not adequately addressing opportunities to integrate goals of biodiversity, land and water management, social equity etc. with other climate adaptation targets and strategies. This is a huge missed opportunity, which will affect the government’s capacity to deliver future public good services including environmental protection, community health, emergency management and national security.

In order to foster resilience, better linkages need to be drawn between compensation for exposure to impacts of climate change and the actions taken by individuals and communities to reduce risk.

In future, governments, organizations and individuals will increasingly be required to take better account of whole of life costs in terms of both investment and real assets, including those that are likely to arise from climate change.

Cost-benefit analysis will need to include examination of the full life-cycle capacity of environmental assets, especially in relation to securing their future-benefit potential - not just in terms of reducing risk but also reducing vulnerability to future climate change impacts, long and short-term, including through the provision of public goods.

This will involve quantifying ecosystem services provisioning capacity - preferably within a broader national framework. With appropriate regulatory and policy incentives, local governments could be encouraged to invest in improved green infrastructure against say, predicted health costs for heat-related illnesses and conditions, or health savings accrued in relation to encouraging more active lifestyles. Investment in improved environmental capacity could potentially be weighed up via reduced premiums for risk exposure in other areas.

Insurance markets may also need to consider the future possibility of individual property owners being compensated (via lower premiums, access to higher levels of cover etc.) for incorporation of environmental assets which improve resilience at broader landscape scales beyond the insured property boundary - e.g. common good provisions.
AILA recommends that the government act to address such reform policy gaps as a matter of urgency, to adopt an integrated whole-of-government approach to design, planning and development for all settlements, and to set benchmarks, goals and targets as a component of national productivity reporting for progress towards a climate-adapted, fairer and more productive future for all Australians.

The Australian Institute of Landscape Architects (AILA) wishes to thank the Productivity Commission for the opportunity to comment on the Draft Report, and also to offer the expertise and experience of our collective membership base in developing new ways forward for the planning and development of more sustainable and productive communities.

Please don’t hesitate to contact me if you have any queries relating to the issues raised in this submission, or if there are any other matters relating to the development of the final report on which we might be able to provide further assistance - including AILA representation at, or submissions to, upcoming public hearings for this inquiry.

Yours Sincerely,

Paul Costigan
Chief Executive Officer,
Australian Institute of Landscape Architects