



RE: DRAFT ANNUAL BUSINESS PLAN 2022-23

The Western Adelaide Coastal Residents Association (WACRA), with over 300 members and supporters, is appreciative of the opportunity to provide feedback on the Draft Annual Business Plan to the Charles Sturt Council (CSC). This is an important part of Council's expressed commitment to consultation and community engagement strategies using its current Public Consultation Policy.

GENERAL COMMENTS

As well as considering the Draft Annual Business Plan, we have also referred to the following Council documents:

- Charles Sturt Community Plan 2020-2027:
<https://www.charlessturt.sa.gov.au/council/council-documents/plans-and-strategies/community-plan>
- Council Agenda and Reports 26 April 2022:
https://www.charlessturt.sa.gov.au/data/assets/pdf_file/0029/1137944/cl22-04-26a.pdf
(which includes Appendix 4: Climate Change Adaptation Governance Assessment Report for the City of Charles Sturt, AdaptWest)

Charles Sturt's vision is as a 'leading, liveable City' (5. Our Leadership, Objectives and Strategies, page 18, Draft Annual Business Plan). To achieve this vision, leadership on climate change mitigation and adaptation is critical. Accordingly, we are only focusing on these aspects of the budget.

Addressing the Climate Emergency is now listed as a key strategic issue for Charles Sturt Council. However, it concerns us that there is so little funding assigned to greening and other climate change initiatives, given that recent studies¹ have found that most Australians are more concerned about climate change than COVID/other issues.

You don't have to look far in the media to see that risk of flooding is now forefront in the minds of homeowners and insurers alike. Talk of 'a one-in-100 year rainfall event' has been criticised in the media (eg by the ABC²) as being unrealistic. Yet in the City of Charles Sturt there has already been a flash flood in 2022, notably in Grange and Seaton but also in West Lakes. Residents have expressed their concerns to WACRA about this issue and would like it urgently addressed. Floodplain mapping is of some assistance in identifying risk areas, but still doesn't acknowledge that this will be an increasing issue with climate change³. Extreme rain events in South Australia are projected to

¹ ABC News, 6 August 2021, Australians are three times more worried about climate change than COVID. A mental health crisis is looming: <https://www.abc.net.au/news/2021-08-06/australians-three-times-more-worried-about-climate-change-covid/100354008>

² ABC, 'One-in-100-years' flood talk disastrously misleading and should change, risk experts say (28 Mar 2022): <https://www.abc.net.au/news/2021-03-28/one-in-100-years-flood-talk-misleading/100030144>

³ City of Charles Sturt, Floodplain mapping: <https://www.charlessturt.sa.gov.au/development-and->

become more intense. As well, sea levels are projected to rise by around 24 cm along the South Australian coast.⁴ Whilst these predictions are for mid-century, we know that climate change is accelerating far quicker than predicted, as per the latest IPCC (Intergovernmental Panel on Climate Change) report⁵. We simply cannot afford to be complacent, especially as we are a city situated on the seafront with many flood-prone areas.

We make the above points, which already receive media attention, to emphasise that the short and longer term seriousness of the Climate Emergency is not adequately reflected in the 2022-23 Draft Annual Business Plan. Instead, it appears to be a 'business as usual' budget. Whilst most Council documentation strongly supports a climate agenda (as per the strategic statements referenced below), the budget allocations in the 2022-23 Draft Annual Business Plan far from adequately reflect the actions required to achieve it. We see some change, but it is well behind where we need to be to address the frightening forecasts. Charles Sturt Council has been very slow to genuinely start the adaptation process and, worryingly, is still trailing behind other councils. This lag is especially pertinent when comparing canopy cover. We would like to see change in actions stemming from a realistic budget, not just words.

STRATEGIC CONTEXT

We fully support the following statements and would like to see them more strongly reflected in the financial commitment of the 2022-23 Draft Annual Business Plan. As things stand, they are simply 'motherhood statements'.

- Charles Sturt is 'passionate about delivering an environmentally sustainable future, that our economic strategies are targeted and that our leadership is bold and progressive.' (p 10, Draft Annual Business Plan)
- 'The City of Charles Sturt has had a long history of action on climate change, through projects that have reduced our greenhouse gas emissions including the transition to LED public lighting and investments in solar panels on Council buildings, as well as projects that improve resilience to the physical impacts of climate change including addressing the challenge of the urban heat island effect by integrating more trees and vegetation into streetscapes to enhance cooling for our community, and stormwater management planning for the likelihood of more frequent intense rainfall events.' (p 11, 6.33 Mainstreaming climate change – improving governance systems to manage the risk and local impacts of climate change, Council Agenda and Reports 26 April 2022 https://www.charlessturt.sa.gov.au/_data/assets/pdf_file/0029/1137944/cl22-04-26a.pdf)

STRATEGIC PRIORITIES FOR CHARLES STURT IN 2022/23

Charles Sturt markets itself as 'a place where people feel safe in their homes, neighbourhoods and public places; they are resilient and manage shocks and stresses to build a stronger community' (1. Our Community, Objectives and Strategies, Council Agenda and Reports 26 April 2022, page 12). To ensure this is a reality, we think it is imperative that the issue of climate change is primary in Council deliberations.

Item 6.35: AdaptWest Climate Change Adaption – Regional Partnership Progress Report (Council Agenda and Reports 26 April, page 129), under the heading 'Our Environment – An

[infrastructure/infrastructure/floodplain-mapping](#)

⁴ Climate Change in Australia, South Australia's changing climate:

<https://www.climatechangeinaustralia.gov.au/en/changing-climate/state-climate-statements/south-australia/>

⁵ IPCC reports: <https://www.ipcc.ch/reports/>

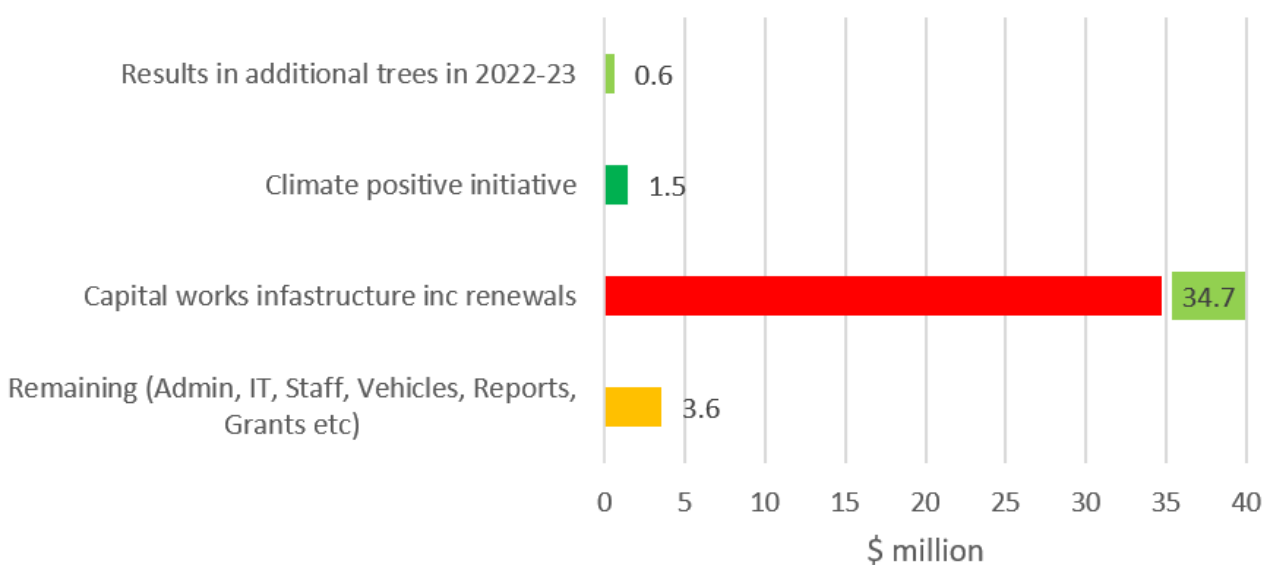
environmentally responsible & sustainable City’, states the ambition that ‘Greenhouse gas emissions significantly reduce, and we adapt to our changing climate. Our city is greener to reduce heat island effects and enhance our biodiversity. Charles Sturt is recognised as a leading partner and educator pursuing a sustainable future with our community.’ This report was received and noted at the meeting.

We acknowledge that there are some good initiatives in the Draft Annual Business Plan to support these AdaptWest goals: namely, community gardens, more whole street planting, ongoing part funding of an AdaptWest staff member, an Environmental Management Officer and Water Sensitive Urban Design (WSUD) sites. (Given the drop in rainfall now and in coming years there will need to be many more of these.) Unfortunately, they are mostly small token amounts adding up in total to only around \$600,000 for initiatives that will directly relate to some additional trees in 2022-23 (noting that 1/3 of this amount is whole street planting that is really an ongoing operational cost).

In addition, there are some good initiatives that have a climate positive focus such as solar installations, stormwater upgrades, recycling grants, and a token amount towards developing the strategy for tree canopy improvement (noting that this \$65,000 doesn’t actually get us any more trees as yet). But this too is only around \$1.5 million, or **3.6%** of the total budget. Compare this to a massive \$34.4 million for capital infrastructure and renewals, and around \$3.6 million on other administrative-type items such as new software, administrative costs, vehicles and new staff roles. So in a climate emergency, only **around \$2.6 million, or 5% of the total budget initiatives** are initiatives specifically attributable to climate mitigation. While we acknowledge that there will be some components of the larger infrastructure projects that incorporate upgrades to stormwater, lighting etc (plus some minimal tree planting as part of the landscape contract), they are small portions of the overall projects, and not a key reason for doing them.

Put simply, this is not a budget that reflects a Climate Emergency and the current 3 degree warming trajectory we are on. The table below demonstrates the above points.

Basic Budget Split



BUDGET BIDS

Georgina House (email 3/5/22) made us aware that all bids are expected to consider and comment on how they align with climate change considerations. This requirement is already reflected in the Net Zero quarterly report (tabled at Council 26/4/22, Appendix 1). AdaptWest's Climate Change Risk and Governance Assessment report (also tabled at Council 26/4/22, Appendix 4) should help tighten this process and avoid a 'tick box' approach. If emphasis is made by Council on the importance of addressing climate change in documentation, education and communication (as per AdaptWest's report), then the focus of project bids will hopefully become more oriented towards risk management, adaptation and mitigation.

Annual Operating Projects (pp 28-40)

Many budget bids are on the table. Whilst they could all be considered worthwhile projects under normal circumstances, we are no longer living in a normal world where we can afford a 'business as usual' model. We would ask that they are prioritised (with some potentially 'put on the back burner') and preference given to climate change mitigation/adaptation projects.

Council's comprehensive response to WACRA questions (Georgina House, 3/5/22) points to a lot of work being done this year to model how Council's Canopy Target will be achieved – funded (presumably) using the Tree Canopy Improvement Strategy (TCIS) \$65,000 budget bid (PBB-1441). The TCIS was initially planned for implementation in 2019. We would like to see initiatives/actions on this strategy sped up given that we are facing a Climate Emergency. **Council's canopy and biodiversity commitments will take many years to achieve and desperately need an immediate and strong response.**

Capital Projects (pp 42-62)

We fully support the bids in this section that are specifically pertinent to climate change/environmental issues and would like to see these types of projects prioritised over others. For example, the St Clair Community Garden, sustainable transport infrastructure, the WSUD site, stormwater flood mitigation, conversions to LED lighting, solar installations, reductions in the use of potable water, open space community projects, community planting, and waterproofing the West are projects that come under this category. Again, while it is good to see these projects listed, they are still a very small part of the overall budget for capital projects, and do not reflect the urgency we face.

RECOMMENDATIONS

1. That Council markedly increases the Annual Open Space Operating budget. It is far lower than it ought to be for genuine change to result. In fact, it has virtually flatlined for years, while Council revenues have increased markedly on the back of urban consolidation which has the greatest impact on softscapes and tree canopy. This deficit of expenditure on open spaces needs to be acknowledged and reversed.
2. That Council endorses the implementation plan for the recommendations from AdaptWest's Climate Change Risk and Governance Assessment report (tabled at Council 26/4/22), and notes that some priority tasks will require funding now to complete and should be included in this budget as well as in future budget deliberations.
3. That (where appropriate) Council integrates mitigation requirements into project planning, budget bid processes and procurement to assess for lowest climate change impact, and the greatest possible climate change mitigation and adaptation outcomes.

4. That Council implements its City of Charles Sturt Environmental Sustainability Policy objectives⁶ for building and open space projects, and immediately integrates these into project planning.
5. That Council adds to its Net Zero website/other documentation⁷ the important role that tree canopy has in reaching Net Zero 2050 targets and in adapting the western suburbs to climate change. For example, the focus areas and targets in 'Net Zero – Our Map to Net Zero Corporate Emissions 2020-2025'⁸ currently refers to the purchase of carbon canopy offsets, but doesn't refer to tree planting actions required within the City of Charles Sturt to reduce our carbon footprint.

SUMMARY AND FURTHER POINTS

This business plan/budget seems largely unchanged from previous years, when instead it is vital to have a fresh mindset and approach that genuinely prioritises climate mitigation and adaptation. We no longer question the science and the IPCC code red language, yet we still tinker at the edges, essentially following a 'business as usual' approach rather than doing what needs to be done. However, the cost of inaction is greater than the cost of action (as was clearly stated in the IPPC summary report presented to Council 26/4/22).

On behalf of our members and the greater community, WACRA implores Council to translate into a **top priority financial commitment from now till 2030** its stated intention to mitigate and adapt to climate change, so that we can all proudly say that we have done what we can to make Charles Sturt a liveable city. If Council steps up, so will its citizens; increasingly concerned residents will support initiatives that they can clearly see are addressing the needs of future generations as well as current ones.

Next year's (2023-24) Annual Business Plan is expected to reflect initiatives such as tree planting and tree canopy modelling and analysis undertaken by Council in 2021-22 (Georgina House, 3/5/22). We hope that the dire state of the world and Council's stated policies/priorities will result in a genuine focus on tree planting, given the time it will take to reach Council's canopy goals⁹. Some other initiatives we would like to see included in future budgets are land purchases to establish urban forests, and the transformation of hard surfaces into softscapes/porous surfaces (eg experimentation with new forms of concrete and bitumen). It is absolutely essential that Council decision makers look beyond their term as councillors or Council staff and the perceived need to spend on items that can be capitalised (and added as assets) so that canopy and other climate change initiatives get their rightful place in the hierarchy of priority spending.

WACRA is an active member of the Community Alliance SA (CASA)¹⁰, an umbrella organisation of 35 resident action groups formed in 2011 following controversial amendments to the Development Plan that caused widespread community concern. The new South Australian planning system (the Planning and Design Code) promised clarity, certainty and efficiency. It has failed to deliver. What it has created is public confusion over planning policy, less transparency, negative impacts from

⁶ Environmental Sustainability Policy:

https://www.charlessturt.sa.gov.au/_data/assets/pdf_file/0024/160548/Environmental-Sustainability-Policy-September-2020.pdf

⁷ Net Zero: <https://www.charlessturt.sa.gov.au/council/council-documents/plans-and-strategies/net-zero>

⁸ https://www.charlessturt.sa.gov.au/_data/assets/pdf_file/0027/738090/Net-Zero-Our-Map-to-Net-Zero-Corporate-Emissions-2020-to-2025.pdf

⁹ GROWING GREEN: Tree Canopy Improvement Strategy 2021-2045: <https://www.yoursaycharlessturt.com.au/tree-canopy>

¹⁰ Community Alliance SA: <https://communityalliancesa.org.au/>

smaller lot redevelopments involving excess car parking on streets, significant reduction and destruction of tree canopy, and reduced protection for all levels of heritage buildings. It has also failed to provide a realistic and democratic engagement with local government and community. The present act fails to give adequate consideration to the extreme importance and urgency of addressing climate change. Council has documentation and policies that recognise action must be taken if we are to reach Net Zero and mitigation/adaptation targets. To meet these targets, Council needs to make climate change a priority budget issue and we call for an urgent review of the Annual Business Plan to emphasise the need for urgent changes to the Planning Development and Infrastructure Act, Regulations and Code. WACRA offers assistance to work with Council to make these necessary changes.

Also at state level, the new Labor government has a policy for heritage that includes tree protection: <https://www.petermalinauskas.com.au/policies/protecting-our-heritage>. The sad fact is that South Australia's tree laws are behind the other states, as per Conservation SA's report¹¹. Local government working with the state government on the issues of planning and heritage is critical.

WACRA, as always, is happy to be part of any further subcommittee or reference groups considering the Final Annual Business Plan 2022-23 and to meet with Council senior staff if that would be helpful. We are also happy to share with Council our ideas for initiatives to increase canopy and other climate change actions via our Climate Matters Group¹².

We would like to acknowledge Georgina House who replied promptly and comprehensively to our questions about the Draft Annual Business Plan and other matters on behalf of Council, other members of WACRA who provided input, and Julie Whitehead (Co-coordinator, Climate Matters Group) for her edits.

Jim Douglas, WACRA Acting Chairperson
Andrea Rankin, Co-coordinator, Climate Matters Group

¹¹ Comparison of Australia's Tree Laws, 2021, Conservation Council SA:
https://www.conservation.sa.gov.au/tree_laws_21

¹² Climate Matters, WACRA: <http://wacra.org.au/climate-matters/>