

21 December 2016

Ms Georgine Roodenrys
Executive Director – Climate Change Policy
Department of Environment and Heritage Protection
GPO Box 2454
Brisbane QLD 4001

Dear Ms Roodenrys.

RE: Queensland Climate Adaptation Directions Statement

Thank you for the opportunity to respond to the Queensland Government's Directions Statement on Climate Adaptation. The Property Council congratulates the Government on completing this important step in developing a comprehensive strategy for the state's adaptation to the changing climate.

The Property Council of Australia is the leading advocate for Australia's biggest industry – property. We are a national not-for-profit organisation established to promote the work of the property industry in delivering prosperity, jobs and strong communities to all Australians.

Here in Queensland, the Property Council represents over 360 member companies across residential, commercial, retail, retirement living, industrial, tourism and education sectors.

As a member of the Government's Queensland Climate Adaptation Strategy Partners group, the Property Council has actively supported the development of the Government's three-part program of work to position the state to understand, respond and adapt to the changing climate.

As Queensland's largest industry, employing 240,000 Queenslanders and contributing 11.4% of the state's economic activity, the property industry will play a critical role in identifying risks for Queensland from the changing climate and adapting to minimise these risks.

The directions proposed by the Government that will form the basis of the adaptation strategy, namely to 'recognise, equip, integrate, collaborate and evaluate', are supported by the Property Council. In particular, the Property Council welcomes the Government's commitment to facilitate partnerships with stakeholders from key sectors to develop sectoral adaptation plans.

Of central interest to the Property Council's members is the development of a sectoral plan for 'human settlements and infrastructure.' While the property industry supports this measure, engagement with the sector will be critical to the success of this endeavor.

A list of potential adaptation opportunities for the built environment sector are presented in the Directions Statement. These range from considering sea-level rise in land-use planning to incorporating more green space in urban planning. While the listed potential initiatives are all important, they are already long-established features of Queensland's regulatory framework for planning and construction.

The Property Council is keen to engage with the Government and other stakeholders to determine where the next opportunities lie to reduce the risk of current and future climate change impacts on Queensland's built environment, through the sectoral plan consultation process.

Producing accurate data which quantifies actual climate risks will be a critical component to achieving support for Government adaptation initiatives. The Property Council strongly supports the Government's QCoast2100 program, which is assisting local governments to develop a more accurate picture of how sea level rises and coastal erosion will affect their jurisdictions.

The Property Council encourages greater investment in programs such as QCoast2100, which increase certainty for property owners around what their level of risk is and how adaptation activities could reduce this risk.

While there are significant opportunities for the State Government to implement positive reforms, poorly considered policy responses to this challenge pose a risk to the Queensland economy.

Recent changes proposed to the State's vegetation management framework, the revision of the coastal management district and amendments to the *Environmental Protection Act* have all intended to improve environmental outcomes, but have had a disproportionate impact on the property industry. The economic impact of these reforms could have been minimised with minor amendments that would not have compromised the desired environmental outcomes.

The Property Council encourages the State Government to consider the development of the Climate Adaptation strategy in concurrence with the impending Queensland Housing Strategy, the recently released South East Queensland Regional Plan, and other strategies being developed by Government agencies.

The Property Council looks forward to continuing to work with the Government in the formulation of the remaining components of their climate change policy. If you would like further information in relation to this matter, please contact me on (07) 3225 3000 or cmountford@propertycouncil.com.au.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a horizontal line.

Chris Mountford
Queensland Executive Director