



Kooyong Climate Change Alliance

Submission on the City of Boroondara Draft Climate Action Plan

2 August 2021

Overview

We would like to congratulate the Council on the release of its draft Climate Action Plan. The net zero emissions targets for both Council operations and the community as a whole are particularly welcome. Many other aspects of the plan are also very pleasing, such as the inclusion of targets for zero actual emissions, the statement that the Council will lead and support the community to reduce emissions and the commitment to embed climate action in Council staff roles and responsibilities.

However, despite the strong net zero targets, we believe that the draft CAP will require significant strengthening if it is to be the basis for an adequate response to the climate emergency. The unambitious 2030 emissions targets and the overall lack of urgency and detail are especially concerning.

Key additions or amendments to the draft CAP which we suggest include:

- Declaration of a climate emergency. The CAP should include an overview of the implications of climate change, and the need to restrict heating to 1.5°C for a safe climate. The plan should convey a real sense of the need for urgent action by declaring a climate emergency.
- Remove the description of community targets as 'aspirational'. Whatever the intention, this description suggests a lack of real commitment.
- Strengthen the 2030 emissions targets. Dramatic emissions reductions over the next ten years are critical to limit heating to 1.5°C. The community target should be increased to a 70% reduction to align with Climate Council recommendations, and Council's own target increased to 97%.
- Strengthen the supporting measure targets and add new measures.
 - Add Council measures including 100% renewable electricity, reduction in gas usage (80% by 2030) and separate quantified targets for canopy cover on public land and road reservations
 - Strengthen the Council fleet target to 100% electric by 2030
 - Add community measures for major emitters' emissions (net zero by 2030), reduction in community gas usage (50% by 2030), changes to the planning scheme, installation of electric bicycle/scooter charging points and reduced private car usage
 - Strengthen the tree canopy cover target (33% by 2030) and increase the planting target.
- Include an indicative budget and an indicative timetable for implementation of planned actions. These are an essential part of a credible action plan.
- Provide more detail about the planned actions. There is insufficient detail in the plan to give confidence that the plan's vision and targets will be delivered. High priorities among the additional and strengthened actions we propose include:
 - Appoint additional staff to assist implementation and further development of the plan
 - Ensure all new Council facilities are designed for zero emissions

- Expand community education and information programs and establish an ‘outreach’ program
- Provide a free advisory service to help businesses and households reduce emissions
- Provide free comprehensive household energy audits (with conditions)
- Provide households and businesses with access to finance for all climate related improvements
- Establish a program to encourage households and businesses to transition from gas
- Provide financial assistance to low income households for all climate related improvements
- Promote and facilitate or partner in a wide range of community energy initiatives
- Implement a program to encourage tree planting and protection on private land
- Provide incentives for electric vehicle use (e.g. parking concessions)
- Identify gaps in public transport services and advocate for improvements
- Upgrade Council infrastructure to improve safety, access and shelter for public transport users
- Develop a Walking Strategy to promote walking as an alternative to car use
- Action(s) identifying more details of bike infrastructure improvements (e.g. specific routes, ‘pop-up’ lanes, minor roads)
- Commission studies to obtain robust baseline data for community emissions, tree canopy cover and other key performance measures.
- Strengthen the plan’s governance framework.
 - Establish a Community Advisory Committee on the environment with a brief including oversight of Council climate action
 - Obtain independent certification of Council and community emissions reporting
 - Provide a detailed annual report to the community comparing all outcomes with targets
 - Provide quarterly progress updates on implementation to the community.

We do not claim to be experts, but we strongly believe that the changes we have proposed to the draft are soundly based and would help ensure that Boroondara has a Climate Action Plan which realistically addresses the challenge of the climate emergency.

Introduction

The KCCA would like to commend Boroondara Council for developing its draft Climate Action Plan. We are particularly pleased by the plan targets for net zero greenhouse gas emissions from Council operations by 2022 and from the whole community by 2035, and by the inclusion of targets for actual zero emissions. We also welcome Council's commitment to embed climate action in Council staff roles and responsibilities and the clear statement of its essential role in climate action, including leading, facilitating and supporting the community to reduce emissions and advocating for other levels of government to take climate action.

However, despite the ambitious targets for net zero emissions¹, the plan as a whole lacks a sense of urgency and fails to make a compelling case for strong climate action by the Boroondara community. Moreover, the actions to achieve the targets are in general specified only at a very high level, and there is no indication of priorities or budget. There are also a number of additional actions which we believe should be included in the plan to support delivery of the targets. It is acknowledged that a more detailed two year implementation plan will be developed later in the year, but the Action Plan should itself contain sufficient detail to give the community confidence that the emissions targets can be achieved.

The remainder of this submission sets out suggested amendments to strengthen the plan and help to deliver its objectives.

Context – the Climate Emergency

The consultation process for the plan has shown there is strong community support for climate action by the Council, but it should not be assumed that the whole community understands the urgency and scale of the action required. The plan should include a brief introductory discussion of the state of the climate, the current trajectory of change and the decisive global action needed to keep the climate safe. A key reference point should be the need to limit global heating to 1.5° C above pre-industrial levels. This discussion should draw on authoritative reports such as the UN's *Emissions Gap Report 2020*.

This global view should be linked to the implications for Boroondara and the need for local action. The plan should do more than acknowledging that the City of Boroondara should be part of 'the important global movement towards zero emissions' and 'prepare to adapt to a warmer more variable climate' (page 4). It should clearly establish the Council as a climate leader by including the declaration of a climate emergency. Please refer to previous KCCA submissions to Council for a full discussion of the need for a climate emergency declaration (particularly the Deputation Submission dated 19 March 2020). The extreme temperatures experienced in the recent heatwaves in Canada and north east USA (and elsewhere) were beyond the levels predicted by current climate models and provide yet more evidence of the need for emergency action.

In order to achieve the community emissions target, the Council will need to engage with the community and clearly communicate the urgency of reducing our emissions. An emergency declaration would be a powerful tool for conveying this message and stimulating action across the community. It would complement and help provide a public rationale for the proposed targets.

¹ The term 'zero emissions' is used to mean 'zero greenhouse gas emissions' throughout.

Proposed plan revisions

- Provide additional context by including a short introductory section on the global climate crisis, highlighting the importance of limiting global heating to 1.5° C and the need for urgent action.
- Incorporate a Council climate emergency declaration in the plan.

Vision and Role

The plan should represent a significant new phase of more ambitious climate action by the Council. This is already reflected in the emissions targets, particularly the community target of net zero emissions by 2035. This is not inconsistent with recognising the Council's achievements to date (especially the 80% reduction in Council's own emissions) and the plan as a continuation of past action.

The statements of vision and role in the plan (pp 6-7) should signal this new phase of action to the community more clearly. One way to help achieve this would be through some judicious re-ordering and re-wording of the dot points. For example, the statements relating to emissions should be given higher priority in the lists, and the stress on continuity should be reduced to avoid the impression that the plan is 'business as usual'. The step-up in ambition should be more clearly articulated.

The first point in the vision statement refers to Council and community goals. A direct and concise statement of the goal of the action plan would improve its focus and provide a simple way of indicating Council's increased ambition.

Proposed plan revisions

- Re-word and re-order the dot points on vision and role to highlight the start of a new phase of more ambitious climate action by the Council.
- Include a statement of the plan's objective along the following lines:

The aim of this plan is to establish Council as a climate leader, working with the community and other levels of government to:

- help keep the climate safe (limiting warming to 1.5°C) by reducing Boroondara's greenhouse gas emissions to net zero as soon as possible; and
- protect the Boroondara community from the impact of those changes in the climate which do occur.

Council's corporate emissions

In addition to the breakdown of Council's corporate emissions for 2007/08, a breakdown for the current year should be provided. This is essential in order to understand future priorities for emissions reduction, and should be included even if there is some uncertainty about the estimates due to the impact of the pandemic and/or the availability of final data.

Proposed plan revisions

- Include a breakdown of current Council emissions, if necessary adjusted for the impact of the pandemic.

- Provide a brief explanation of ‘Scope 3’ emissions (Figure 1).

Municipality-wide emissions

We understand that the Snapshot data presented in this section are based on the allocation of relatively high level emissions data to the Council level, and may therefore not reliably represent the specific emissions producing activities occurring in Boroondara. This means that the Snapshot does not provide a sound basis for tracking the impact of strategies on emissions. A baseline study for community emissions should be undertaken, and a robust methodology to track changes and the impact of the plan should be established.

This section of the plan should focus on identifying the priority areas for action to reduce community emissions. It is very clear that energy and transport overwhelmingly dominate current emissions, and that this is where the major changes are required to achieve the target of carbon neutrality.

Most of the discussion in this section is concerned with other aspects of the climate challenge. It is certainly crucial that action be taken to address the full range of relevant factors, and it is clearly important to highlight those areas where the Council can most directly influence outcomes, including the tree canopy and waste disposal. However, the text as it stands tends to obscure the most important changes needed in Boroondara to reach net zero emissions.

This section should be re-written to clearly identify the priority areas of climate action and the scale of action required to achieve the community emissions target. A clear link should be established between the current state of emissions and the detailed actions and supporting targets which appear later in the plan.

As far as possible, relevant baseline data should be quoted for priority action areas, if possible with historical trends. Some of these data are already included in the plan elsewhere, including the extent of solar PV power generation and tree canopy cover. Among other baseline data which should be included are the municipality’s transport mode split, public transport accessibility, domestic gas usage, the public/private split of tree canopy cover and the extent and accessibility of open space.

Proposed plan revisions

- Commission a baseline study of community emissions and establish a methodology to reliably track changes
- Modify the discussion of community emissions to primarily focus on the priority areas where action will be required to achieve net zero emissions
- Strengthen the links between this section and the detailed actions and targets appearing later in the plan.
- Provide relevant detailed baseline data related to priority action areas, particularly energy (e.g. solar power generation, domestic gas use), transport (e.g. mode split, public transport accessibility) and canopy cover (including public/private split).

Considerations in developing the plan

The aim of identifying ‘the most effective path to reduce emissions and to a more sustainable future’ (p 16) and the list of considerations in developing the plan are entirely appropriate, but this section could be strengthened by adding a point about the priorities for action.

Proposed plan revision

- Include an additional consideration about the identification of the priorities for action, referring to the impact on emissions, cost effectiveness and ease of implementation.

Council corporate emissions target

It is understood that the phrase ‘net carbon neutral’ has been used to mean ‘net zero greenhouse gas emissions’ in the draft plan. On this basis, the target for Council to be net carbon neutral by 2022 is very welcome.

However, the Glossary definition (page 34) of ‘carbon neutrality’ refers to achieving ‘zero net emissions of carbon dioxide’, with no reference to other greenhouse gases. This is consistent with the [IPCC’s definition](#) of ‘net carbon neutrality’ as ‘net zero CO₂ emissions’. Unfortunately, there does not appear to be a universally accepted definition. For example, the definition in the UN’s [Climate Neutral Now Guidelines](#) refers to all greenhouse gases, not just CO₂. In view of the significance of methane and other greenhouse gases in driving climate change, we suggest the term ‘carbon neutrality’ should be replaced by ‘net zero greenhouse gas emissions’ throughout the plan to avoid possible misunderstandings. Alternatively, the definition of the term as used in the plan should be clarified.

A potential weakness of the target is that it could in principle be achieved by extensive purchase of carbon off-sets, with limited reductions in actual Council emissions. A statement that Council’s use of offsets will be minimised should be included.

The target of 90% actual emissions reduction by 2030 compared to 2007/08 implies an approximate 50% reduction of current emissions. This seems unduly conservative assuming the conversion of the ‘Small Market’ electricity supply to renewable sources, the planned reduction in gas use and the 90% conversion of the fleet to EVs. Our rough calculations indicate that a reduction of 95% should be easy to achieve. The maximum possible emissions reduction should be targeted over the next ten years, because it is cumulative emissions which will determine the climate outcomes. To demonstrate its climate leadership, we suggest Council should aim for a reduction of 97%.

It is recognised that there may be minor intractable emissions which mean that 100% elimination of emissions cannot be achieved before 2040. However, in view of the drawdown capacity of additional tree planting, Council should consider setting a negative emissions target for 2040. It is clear that negative emissions will need to play an important role if average heating is to be limited to 1.5°C, and Boroondara should play a part.

Proposed plan revisions

- Replace the term ‘carbon neutral’ by ‘net zero greenhouse gas emissions’, or clarify that the term is used to cover all greenhouse gas emissions

- Include a clear commitment that the use of offsets to achieve the net zero target will be minimised
- Strengthen the Council emissions reduction target for 2030 to 97% compared to 2007/08
- Consider replacing the zero emissions target for 2040 by a negative emissions target.

Council supporting measures 2030

The supporting measures are reasonable, but some of them should be strengthened and supplemented by additional measures.

The measures should include the full conversion of Council's electricity supply to renewables (preferably by 2022).

The target for installation of additional solar PV panels should be increased to reflect installation of panels at all Council facilities where it is feasible, including sites where the financial benefits are marginal.

The target for a 50% reduction in the number of Council buildings using gas is disappointingly unambitious. The target should be significantly strengthened and a new measure added to indicate the reduction in gas usage by Council. It would be sensible to target the easy conversions at small facilities initially, but the high usage facilities must be major focus. The gas pool heating proposed for the Kew Recreation Centre redevelopment should be replaced by zero emissions technology, and conversion of the heating at the other public pools should be high priority. All new heating appliances should be electric.

As indicated on page 14 of the plan, gas is a very large contributor to emissions in Boroondara, and Council should be a community leader in this area to demonstrate what can be achieved. A target of at least 80% reduction in gas usage by 2030 should be adopted.

The canopy cover measure should be quantified, with separate targets for public land and street trees/reservations. Targets of at least 45% and 35% respectively are proposed, broadly consistent with the City of Melbourne's [Urban Forest Strategy](#). The data issues discussed below under 'Community supporting measures' are also relevant here.

The target for conversion of the fleet to electric vehicles should be more ambitious. As discussed on page 22 of the draft, there is still some uncertainty about when the conversion of larger non-passenger vehicles will be feasible, but the current pace of development suggests this will be well before 2030. It is very likely that a fully electric fleet will be the most financially attractive option by that time. The target should therefore be increased to 100%. A caveat about feasibility could be added along the lines of 'subject to the availability of suitable larger vehicles'.

The biodiversity measure does not directly support the high level emissions reduction targets, and the water harvesting measure could also be seen as primarily an adaptation measure. We support inclusion of these measures, but it may be worth considering modifying the presentation to distinguish between emissions related measures and adaptation measures.

Wherever possible, separate budget lines relating to each measure should be created.

Proposed plan revisions

- Add a new measure for Council use of 100% renewable electricity, with a target year of 2022
- Increase the target for installation of solar panels to reflect installation at Council facilities wherever feasible
- Add a new target for 80% reduction in Council gas usage by 2030
- Modify the target for the reduction in the number of buildings using gas for consistency with the gas usage target (or remove this measure)
- Set targets of at least 45% canopy cover on public land and 35% canopy cover on street/road reservations by 2030
- Strengthen the target for conversion of the Council fleet to electric (or zero emissions) vehicles to 100% by 2030
- Consider identifying emissions reduction and adaptation measures separately
- Where possible, establish separate budget lines related to the measures and distinguish emissions reduction and adaptation expenditure.

Community emissions targets

The limits of Council's power to influence community emissions (page 19) are recognised. However, the description of the community emissions targets as 'aspirational' is unfortunate, because it may give the impression that Council is not fully committed to the targets. Council's caution is understandable, but KCCA believes that the qualification of the targets as aspirational should be removed. There is a significant risk that readers will interpret the qualification as implying that the targets should not be treated seriously, undermining the effectiveness of the plan. On the other hand, readers of good faith will understand that Council cannot be fully responsible for the level of community emissions, particularly given the explanation on page 19, so the qualification is unnecessary.

We strongly support the community targets for net carbon neutrality (read to mean net zero greenhouse gas emissions) by 2035 and zero actual emissions by 2040. As for the Council target, minimum use of offsets to achieve the net zero target should be a key objective.

Unfortunately, the target for a 30% reduction by 2030 compared with 2020 is not consistent with the ambitious levels of the other targets. The 30% target implies that 70% of current emissions will not be eliminated until the decade following 2030 if the 2040 target is to be achieved. As noted above, it is cumulative emissions which will drive climate outcomes, and the path to zero emissions needs to be 'front-loaded' in order to keep the climate safe. The [Climate Council](#) has recently recommended that Australia should target a 75% reduction in emissions by 2030 based on 2005 levels as a fair contribution to avoiding 'a strong risk of irreversible global climate disruption'. This is approximately equivalent to a 70% reduction compared to 2020 emissions.

A target of 70% emissions reduction by 2030 is also more consistent with the aim of net zero emissions by 2035 (also recommended by the Climate Council) than the draft target of 30%. A 30% reduction by 2030 combined with net zero emissions in 2035 implies very rapid reductions over a five year period and/or very high usage of off-sets. As discussed, off-sets can have only a very limited place in an effective long term climate strategy.

Proposed plan revisions

- Remove the description of community emissions targets as ‘aspirational’
- Replace the term ‘carbon neutral’ by ‘net zero greenhouse gas emissions’, or clarify that the term is used to cover all greenhouse gas emissions
- Include a statement that the use of offsets to achieve the net zero target should be minimised
- Strengthen the 2030 community target to a 70% reduction in emissions compared with 2020.

Community supporting measures 2030

The community supporting measures are reasonable, but some additional measures should be included and some of the proposed targets strengthened.

Rapid reduction in emissions by Boroondara’s major emitters will be essential if the municipal emissions targets are to be achieved. Working with these organisations to assist them to reduce their emissions should be a major priority for the Council. A measure should be added for the major emitters to achieve net zero emissions by 2030 and zero actual emissions by 2040.

Given the significance of emissions from gas in Boroondara (page 14), a measure of the reduction in gas usage by the community should be included. We propose targeting a reduction in usage of at least 50% by 2030.

Ensuring that all new buildings and developments in Boroondara have net zero emissions by advocating for changes to the planning scheme and the National Construction Code should be a key focus of the Council. A suitable supporting measure should be included to reflect the importance of this change.

It is assumed that the tree planting target refers to planting by the Council. This should be clarified, and a much more ambitious target set. Significant expansion of the urban forest is needed both to drawdown emissions and reduce the urban heat island effect. Planting of 20,000 trees by 2030 should be achievable.

The current Boroondara canopy cover of 28% quoted in the draft does not on the face of it seem consistent with lower estimates in the 2017 [canopy cover study](#) commissioned by Council (25%) or the 2019 [Urban Vegetation Cover Change in Melbourne](#) study (20.6%), nor with the higher estimate in the 2020 [Greener Spaces, Better Places](#) analysis (31.5%). There are also apparent inconsistencies in the assessment of trends in these reports. A new study should be undertaken to obtain robust baseline data (unless it is already available) and a reliable measurement methodology established for tracking progress consistently.

We appreciate the difficulty of increasing overall canopy cover, given the challenge of increasing tree canopy on private land. However, this should be a major focus of Council, with new strategies introduced to drive change, including incentives. The draft target of 30% cover is disappointingly low, and we believe that a target of at least 33% is realistically achievable by 2030. Given the data issues, this might be better expressed as an increase of 5% (in absolute percentage point terms).

The electric vehicle charging accessibility measure is welcome, but a separate target for electric bicycle/scooter charging points should be included.

Changes in transport mode use will be essential to drive down transport emissions as well as the transition to electric vehicles. In particular, reductions in the use of private vehicles for travel to work should be targeted. It is likely that this shift will be assisted by increased working from home as well as increased use of public and active transport. Council's limited ability to influence private car usage is appreciated, but inclusion of this target will help focus Council's transport advocacy and its active transport initiatives. Consideration should be given to including supplementary targets relating to other trip types (especially shopping) to ensure they are not neglected. We propose a target of 45% of work trips by private car (driver or passenger) in 2030 (compared with 55% in 2016 Census).

As with the Council measures, consideration should be given to identifying the emissions related and adaptation related measures separately and, where possible, budget lines related to each measure should be established.

Proposed plan revisions

- Include a target of net zero greenhouse gas emissions by 2030 for the major emitters in Boroondara, with zero actual emissions by 2040
- Include a target for at least a 50% reduction in community gas usage by 2030
- Include a target for implementation of changes to the planning scheme to mandate that all new buildings and developments have net zero emissions by 2025
- Clarify the tree planting measure (Council planting only?) and increase the target to at least 20,000 trees by 2030
- Increase the municipal canopy cover target to at least 33% by 2030 (i.e. an increase of at least 5 percentage points based on current cover of 28%)
- Include a target for installation of electric bicycle/scooter charging points at all shopping precincts and train stations by 2030
- Include an additional measure to reduce private car usage for travel to work to 45% by 2030 (based on Census data)
- Consider including additional transport measures for public transport, active transport and non-work trip types
- Consider identifying emissions reduction and adaptation measures separately
- Where possible, establish separate budget lines related to the measures and distinguish emissions reduction and adaptation expenditure.

Actions

The draft plan includes many actions which will help reduce emissions and assist the community to adapt to the changing climate. Actions to provide climate training to staff and Councillors, embed climate action in processes, roles and performance management and to consider climate impacts in relevant Council decisions are very pleasing.

However, there is insufficient detail in the plan about the content, priority, timing and resourcing of the actions proposed to give confidence that the plan's vision and targets will be achieved. It is

acknowledged that a more detailed two year implementation plan will be prepared, but the Action Plan itself should plot a clear path for the delivery of Council's climate objectives. Given the length of the planning process and the community expectations set by the title of the plan, this should be a minimum requirement. This will require further specification of detail about actions already in the draft and the inclusion of additional actions, as well as indicative priorities, timing and budget.

Key areas of weakness include the following:

- The failure to identify priority actions and provide timeframes for implementation
- The lack of commitments on resourcing for detailed program development and implementation
- The absence of a framework for community input to program development (beyond a 'community check-in survey')
- The lack of detail about increasing community engagement through enhanced education programs and community outreach
- The failure to include the provision of a more comprehensive energy audit service
- The lack of more comprehensive programs to assist financing of energy efficiency improvements, solar panels, batteries, heat pumps etc.
- The absence of a community gas transition strategy
- The lack of detail regarding public and active transport related actions
- The lack of a program to increase tree planting on private land
- The vagueness of proposed data and monitoring improvements

The revisions suggested below focus primarily on strengthening actions already in the draft and identifying additional actions which should be included. Note that the list of additional actions is not intended to be exhaustive. Some suggestions about priorities are also included, but we have not attempted to develop a timetable or assess resource requirements. This should be a key priority for Council in finalising the plan.

Proposed plan revisions

- The highest priority actions should be identified; prioritisation should be based on impact, cost effectiveness and ease of implementation.
- Indicative timings should be provided for all actions; this could take the form of identifying broad stages for implementation to give readers a sense of how the plan will unfold to deliver the plan goals and targets. If possible, some major plan milestones should be specified.
- Target dates and quantities should be specified for individual actions wherever possible, supplementing the higher level targets specified earlier in the plan.
- An indicative budget should be specified; it is recognised that expenditure on the plan will need to be subject to Council's annual budget process, but a broad indication of costs is essential to demonstrate the Council's commitment to climate action. This is particularly important for the early years of the plan. Longer term, a minimum percentage of Council expenditure devoted to climate initiatives should be specified. KCCA would support a 4% minimum (including climate related transport initiatives), as recommended in the [Local Government Climate Emergency Toolkit](#). The current allowance in the 2021-22 budget

should be substantially increased accordingly (please refer to the KCCA submission on the proposed budget for details).

Proposed additional actions (includes strengthening of actions already in the draft)

Energy efficiency and renewable energy

- Convert Council's remaining non-renewable electricity supply to renewable sources
- Obtain independent certification of Council's emissions reporting and net zero emissions status
- Install zero emissions pool heating at the Kew Recreation Centre redevelopment, and progressively replace gas pool heating at other sites [Complements the Natural Gas Transition Plan for Council buildings]
- Ensure all new Council facilities are designed for zero emissions [Complements the actions on Council's Sustainable Building Policy and ESD of Council buildings]
- Implement a community solar PV and battery bulk buy program [Strengthens the solar bulk buy action]
- Introduce (and/or advocate for) measures to ensure that new buildings and developments are built for zero emissions (e.g. mandating no new gas connections from 2025 and installation of solar panels (with appropriate exemptions)) [Complements overarching action on planning scheme advocacy]
- Develop and implement a large emitters strategy, forming partnerships with Boroondara's large emitters to assist them to reduce all their energy related greenhouse gas emissions to zero [Complements the action to facilitate PPAs for large users]
- Significantly expand Council education and information programs to heighten community awareness of the climate crisis and promote improvements in energy efficiency and the transition to renewable energy in homes and businesses [Complements the efficiency workshops, advice and support programs action]
- Provide free access to a comprehensive advisory service to help households and businesses reduce their greenhouse gas emissions [Complements the workshops, advice and support action]
- Expand the current energy advice scheme to provide full household energy audits at no cost (possibly via rate reductions) conditional on adoption of some of the recommended improvements by the householder, and giving preference to low income households and vulnerable residents [Complements the workshops, advice and support action]
- Provide residents and businesses with easy access to finance for climate related building improvements, including improved energy efficiency, installation of solar panels and batteries and installation of heat pumps to reduce gas usage (possibly via Environmental Upgrade Finance) [Complements the action to support efficiency and renewable upgrades]
- Establish a program to encourage the transition from gas in homes and businesses, including a heat pump bulk buy scheme [Complements the action to support efficiency and renewable upgrades]
- Promote and facilitate energy agreements for apartment buildings and multi-occupancy commercial buildings, particularly solar panel installation

- Promote and facilitate and/or partner in community energy initiatives such as community batteries, micro grids, virtual power plants and group power purchasing agreements, providing financial support where appropriate
- Establish an active Council outreach program staffed by 'climate champions' to advise residents and businesses on energy efficiency and transitioning to renewable energy, including information on relevant Council programs (education, audits, bulk buy and financial assistance)
- Provide financial support to assist vulnerable and low income households upgrade energy efficiency, install solar panels and transition from gas [Strengthens the action on support for low income household efficiency upgrades]
- Develop a Natural Gas Transition Plan to phase out use of gas at Council buildings, initially focused on older high use gas appliances, and ensure there are no new gas connections at Council facilities [Strengthens the action to develop a Gas Transition Plan]

Biodiversity and trees

- Develop an Urban Forest/ Urban Greening Strategy for Boroondara with an associated planting plan, covering public and private land and with climate change mitigation and adaptation as key priorities [Strengthens the Urban Forest Strategy action]
- Commission new canopy cover study to obtain robust baseline data (including details by tenure type) and establish a reliable measurement methodology for tracking changes in cover consistently
- Develop and implement a program to encourage tree planting and protection on private land, including education highlighting the cooling and carbon drawdown benefits, and incentives to increase tree canopy cover [Complements the proposed tree giveaways, policies to protect trees on private land and the biodiversity education program]
- Update the Boroondara Open Space Strategy, prioritising climate change mitigation and adaptation and maximising the opportunities for increasing carbon drawdown [Strengthens the Open Space Strategy action]

Transport

- Convert all major public car parks to 'solar car parks' by installing electric vehicle charging stations, solar panel and batteries and encourage commercial car park operators to do the same [Complements actions on charging stations]
- Ensure electric vehicle and bicycle/scooter charging points are available at all significant shopping strips and activity centres using renewable electricity (and preferably local solar panels) [Complements actions on charging stations]
- Facilitate (and if possible mandate) provision of electric vehicle charging points at apartment buildings, multi-dwelling developments, shared commercial facilities and larger businesses [Complements actions on charging stations]
- Provide incentives for electric vehicle use via parking concessions and/or dedicated spaces
- Provide more scooter and bike/electric bike Council parking spaces (on and off-street) close to major shops
- Investigate and facilitate or sponsor an affordable electric bike share scheme
- Promote car-pooling for travel to school and work

- Investigate and install or advocate installation of more on-road bike lane facilities, including physically protected bike lanes and 'pop-up' bike lanes on major roads [Strengthens on-road bike lane actions]
- Undertake 'bike friendly' upgrades of appropriate minor roads to improve safety and route connectivity, including measures to reduce vehicle traffic volumes and speeds, and safe bike lanes [Complements on-road bike lane actions]
- Improve safety by separating walking and bike paths along busy portions of trails (e.g. by relocating commuter cycling traffic to safe and direct on-road routes) [Complements action for improved off-road bicycle and pedestrian infrastructure]
- Upgrade footpaths, bike lanes and shared paths to be fully accessible for people with disabilities, older people and other disadvantaged groups [Complements action for improved off-road bicycle and pedestrian infrastructure]
- Prioritise pedestrian, cyclist and public transport movements over cars in assessing or approving Traffic Management Plans and Construction Traffic Management Plans
- Develop and deliver a schools program aimed at increasing the proportion of school children travelling by active transport, including sustainable transport events and education/information programs [Strengthens school sustainable transport action]
- Review and improve active transport and public transport access to schools by upgrading infrastructure and/or advocating for better services [Complements school sustainable transport action]
- Develop a Walking Strategy which promotes walking as an alternative to car use as one of its key objectives [Complements the actions about transport hubs, shade and lighting]
- Review and Update Council's Integrated Transport Strategy, with key goals including increasing the active and public transport mode shares and promoting the use of zero emissions vehicles [Strengthens the action to update the strategy]
- Develop a Public Transport Strategy with a key focus on increasing the share of trips taken by public transport [Strengthens the action to develop a public transport strategy]
- Identify gaps in public transport services, accessibility and connectivity in Boroondara, and advocate for improvements (including better bus connections at train stations) [Complements the action to develop a public transport strategy]
- Upgrade relevant Council infrastructure to improve safety, access, shelter etc. for public transport users, particularly women, the elderly, and people with disabilities [Complements the public transport strategy update]
- Advocate for the transition of the public transport bus fleet to electric vehicles
- Advocate for the reduction of freight emissions including incentives for electric trucks and reduced idling and increasing the use of rail for freight transport [Strengthens action for advocacy on freight transport]
- Introduce incentives for Boroondara Council staff to travel to and from work using public or active transport including flexible working arrangements, and discontinue free parking for Council staff [Strengthens action on flexible arrangements and complements car sharing policy]
- Oppose proposals for new or upgraded freeways, where possible in concert with other Councils and local government organisations

Circular economy (waste)

- Where feasible, use carbon neutral and recycled materials in Council projects [Strengthens action on use of recycled materials]

Overarching

- Establish a standing Community Advisory Committee on the environment, with a brief to oversee climate action by the Council and the power to form working groups and consult with relevant experts
- Appoint additional staff with suitable expertise to assist with implementation and further development of the Climate Action Plan
- Report annually on Council's climate action performance, including details of outcomes against all targets [Strengthens annual reporting action]
- Provide quarterly public progress reports on implementation of the Climate Action Plan via the newsletter and website [Complements the annual reporting action]
- Establish clear budget lines with adequate funding to deliver Council's climate commitments (totalling a minimum 4% of the budget), distinguishing expenditure primarily directed to reducing emissions from expenditure on adaptation and linking to specific performance targets where possible
- Further develop collaborations and alliances with community groups and non-government organisations to support local climate projects and advocacy initiatives [Complements actions to increase climate grants and promote community action]
- Embed climate action into staff roles, responsibilities and performance management, with climate related performance targets included in the CEO's and relevant Directors' annual deliverables [Strengthens action on staff performance management]
- Develop and implement a climate advocacy strategy focused on improving climate related policy at State and Federal level, identifying and working with partners including other Councils, Local Government peak bodies and non-government organisations [Complements actions relating to collaboration with other Councils and advocacy about the planning scheme, new developments, transport issues and emissions targets]
- Formalise a Council ethical investment policy which would prevent Council from investing in fossil fuel companies or major emitters, including via superannuation funds and banks which finance the fossil fuel industry [Strengthens action on sustainable investment decisions]
- Expand Council's community engagement programs to increase awareness of climate issues and promote community climate action [Complements the actions on workshops and festivals and schools sustainability education and advice]
- Expand community education and information programs on climate change risks and promote and support preparedness/adaptation [Complements development of Risk Management Strategy]
- Update Council's Procurement Policy and contracting standards to ensure that due weight is given to suppliers' and service providers' commitment to reducing emissions [Strengthens the Procurement Policy action]

- Review the climate impacts of Council policies, processes and strategies, and implement changes to maximise positive effects on the climate [Complements action on new and revised policies and processes]
- Commission a study to ensure robust baseline data on community emissions are available and obtain independent certification of community emissions reporting [Complements enhanced data collection and monitoring action]
- Commission further studies to establish the baseline data needed to formulate specific actions effectively and track outcomes reliably, including energy usage breakdown, tree canopy data, transport mode usage, hard surface area etc. [Complements enhanced data collection and monitoring action]
- Establish reliable mechanisms to track the impact of all Council's climate initiatives to enable timely reporting of progress against targets [Complements enhanced data collection and monitoring action]

Priorities

If declaration of a climate emergency has not occurred prior to or as part of the adoption of the plan (as proposed above), it should be an immediate plan priority. Other initial priority action areas (including components of wider actions) should include:

- Establishing a governance framework for implementation and further development of the plan, including an external Community Advisory Committee
- Formalising a substantial increase in the 2021/22 budget for climate action and increased indicative expenditure for future years
- Employing additional staff for program development and implementation
- Developing more effective advocacy for climate action by the State government
- Eliminating Council electricity emissions and commencing the transition from gas (including pool heating)
- Transitioning the Council fleet to electric vehicles
- Developing and implementing a large emitters strategy
- Providing full energy audits to households at no cost
- Designing expanded community climate related advice, education and information programs
- Providing access to finance to households and businesses for efficiency upgrades, solar panels, batteries and heat pumps
- Commencing a community solar bulk buy program
- Developing the program to promote the transition from gas by households and businesses
- Identifying and constructing priority active transport infrastructure
- Expanding Council tree planting and developing a program to promote planting on private land

Monitoring and reporting

The reporting areas listed on page 31 omit a number of key areas of the plan, for example transport and advocacy. A more detailed monitoring and reporting plan should be specified, including a clear indication of the specific performance measures which will be reported and their reporting frequency. As an absolute minimum, annual reporting should include Council and community

emissions and all the supporting measures. There should also be quarterly public progress reports on implementation.

The update of the plan in five years and updates of implementation plans every two years are welcome. However, there needs to be a meaningful opportunity for community input in all updates, not just a 'community check-in survey' (page 31).

Proposed plan revisions

- A detailed annual report to the community should be produced covering all aspects of the plan and comparing outcomes with all plan targets (for emissions and the supporting measures)
- Quarterly implementation progress reports to the community should be provided
- Meaningful community input should be an integral part of the update of the plan and the preparation and updates of the implementation plans.