

6th August 2021

Ellie Blackwood
A/Senior Policy Officer, Climate Change Policy, Adaptation
Department of Environment, Land, Water & Planning (DELWP)
Email: climate.change@delwp.vic.gov.au

Dear Ms Blackwood,

Re: BUILT ENVIRONMENT CLIMATE CHANGE ADAPTATION ACTION PLAN 2022–2026

We write with regard to the *Built Environment Climate Change Adaptation Action Plan (BEAAP) 2022–2026*. The Council Alliance for Sustainable Built Environment (CASBE) welcomes the opportunity to provide the following feedback on the State governments consultation paper.

[CASBE](#) is a collaborative alliance of Victorian councils committed to the creation of a sustainable built environment within and beyond their municipalities. Our focus is on applying widely accepted Environmentally Sustainable Development (ESD) principles to the built environment through the Victorian statutory planning system. CASBE is auspiced by the Municipal Association of Victoria (MAV). CASBE [members](#) include 38 Victorian councils representing over 70% of Victoria's population.

We note DELWP's preference for a survey response, however in addition to our survey we are also providing this brief written response to tease out some of these issues in greater detail.

In response to the 2026 objectives from the BEAAP that proposes that "Policies and standards are strengthened to provide comprehensive support for climate change adaptation across the built environment", we provide the following feedback regarding the priority actions listed.

PRIORITY: Governance and regulation

Update planning, building and infrastructure standards to respond to climate change based on the most current advice

CASBE supports this action in principle, however we provide the following specific recommendations:

- The addition of "progressively" at the beginning of this action in relation to the timing of updates in accordance with availability of expert evidence, could be read as scepticism at existing and well-established climate science, however it could also be taken to read that the standards will be continuously updated as new climate science emerges. We support the later occurring.

Update building standards relevant to flood, heat waves, bushfire and storm exposure to account for projected climate change

CASBE supports this action in principle, however we provide the following specific recommendations:

- That the National Construction Code, Volume One Section J and Volume Two Part 2.6 Energy Efficiency requirements related to building fabric and thermal performance be updated to include requirements specific to the health impacts of summer overheating and due to cold temperatures of spaces with a focus on dwellings be fast tracked. These requirements should be separate to

mechanical heating and cooling system contribution to thermal comfort to ensure energy poverty and extended blackouts do not result in unsafe or unhealthy spaces. Requirements should be to a finer grain than the current maximum heating and cooling load requirements which are for annual loads and for whole of dwellings.

- That this action includes an assessment of the proposed development sites against current and future climate related hazards and natural disasters. This will support new development to contribute to strengthening community climate resilience within its immediate or local context. We also strongly recommend that this be included as strategy in state planning clause 13.01-1S – Natural hazards and climate change.
- That this action includes a consideration of the impact of future climate conditions on building materials, and that recommendations are made to use materials that are resilient to extreme weather.
- That this action includes a requirement for development to include design strategies to reduce the **urban heat island effect**. For example, by including a target that requires development to demonstrate that at least 75% of the development's total site area (building and landscape) comprises elements that reduce the impact of the urban heat island effect, such as green infrastructure, roof and shading structures and materials with a high solar reflectance index.

Pursue opportunities for upgrades of existing building stock, with a focus on improvements to housing for low income and vulnerable:

CASBE supports the proposed initiatives and recommend updating the building envelop of existing building stock is considered a priority to support thermal safety.

Support resilience of energy infrastructure including to address adaptation to climate change

CASBE supports this action in principle, however we provide the following specific recommendations:

- This action must extend to the built environment by actively supporting development that is resilient to the impact of future climate conditions on energy supply. This can be achieved through the combination of renewable energy infrastructure with energy storage and smart energy management to provide energy resilience, thus enabling buildings to remain as 'refuges' from heat wave during power blackouts.

Improve the skills and capacity of practitioners, industry and community organisations to understand and implement responses to climate change management

CASBE strongly supports this action and strongly advocates for the realisation of ALL the potential responses included in the consultation Plan.

In addition to the proposed actions, CASBE recommends:

- Strong advocacy of the proposed training programs to industry to increase uptake.
- Continue to incentivise the development community to adopt climate resilient approaches to development.
- That a verification and compliance program be designed and adopted to ensure as-built implementation of climate responsive design.

Support decision making by practitioners working in planning, infrastructure and building development

CASBE supports this action in principle, however we provide the following specific recommendations:

- Ensuring that a whole-of-government approach is aligned with existing Acts, specifically in accordance with The *Climate Change Act 2017* legislating a net-zero emissions target by 2050.
- Recognise and support the policy development work being undertaken by CASBE member councils.
- Elevating climate-based decision making in the Victoria Planning Provisions (VPPs) through the ESD Roadmap project, by bringing net-zero carbon targets into the planning scheme as soon as possible.

PRIORITY: Place based actions

Prepare measures to assist local government update local planning scheme instruments to reflect climate change risks

CASBE strongly supports this action.

Review strategic planning and settlement responses to elevated bushfire risk due to climate change & Support drought resilience planning for regional cities and towns

CASBE supports these actions in principle, however we provide the following specific recommendations:

- Site responses that increase community climate resilience should be required. Development should demonstrate how it strengthens community climate resilience within its immediate or local context. We also strongly recommend that this be included as strategy in state planning clause 13.01-1S – Natural hazards and climate change.

Support development of place-based resilient energy generation

CASBE supports this action in principle, however we provide the following specific recommendations:

- That development is encouraged to maximise onsite renewable energy generation.
- That development is encouraged to purchasing residual electricity demand from local and/or offsite renewable energy generation.

Develop program options to support local climate adaptation initiatives

CASBE supports this action and would like to point out and recognise the ongoing partnerships and on-the-ground actions of the following existing Climate Alliances:

Central Victorian Greenhouse Alliance (CVGA)
Eastern Alliance for Greenhouse Action (EAGA)
Gippsland Climate Change Network (GCCN)
Goulburn Murray Climate Alliance (GMCA)
Northern Alliance for Greenhouse Action (NAGA)
South East Councils Climate Change Alliance (SECCCA)
Western Alliance for Greenhouse Action (WAGA)

In summary, CASBE supports the actions proposed in the BEAAP, but would like to re-iterate that it does not convey a sense of urgency, especially with regards to updating policies and standards to support climate change adaptation. There is urgent need to be accelerating the transition to zero carbon buildings in the short-term and considering carbon-positive development in the medium to longer term. A more rapid transition must be made to ensure climate change adaptation and mitigation responses, such as emission reduction are in place sooner rather than later.

Please contact me if you wish to discuss this matter further on 03 9667 5561 or casbe@mav.asn.au.
Yours sincerely

Natasha Palich
CASBE Executive Officer

Notes:

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CASBE is auspiced by the Municipal Association of Victorian (MAV). This submission is made on behalf of CASBE member councils and the views represented in this submission do not necessarily represent the views of the MAV. While this paper aims to broadly reflect the views of CASBE member councils, CASBE has a diverse mix of member councils and the views represented in this submission do not necessarily represent the views of all CASBE members individually.

Individual councils may also respond to issues specific to, and on behalf of, their communities.

The CASBE staff thanks and acknowledges the contribution of those who have provided their comments and advice in the development of this submission.