

4 July 2024



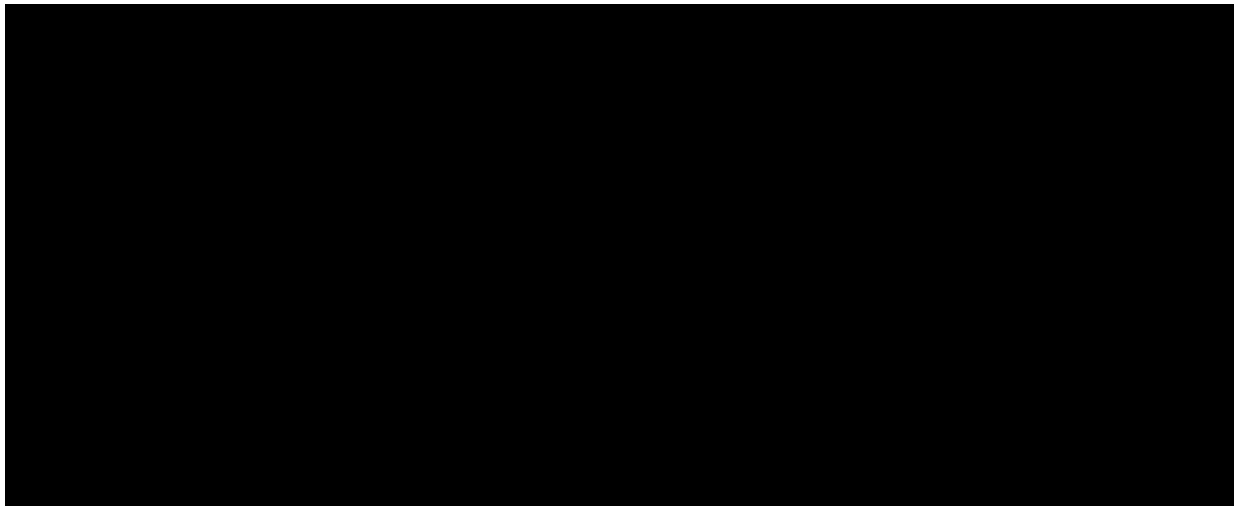
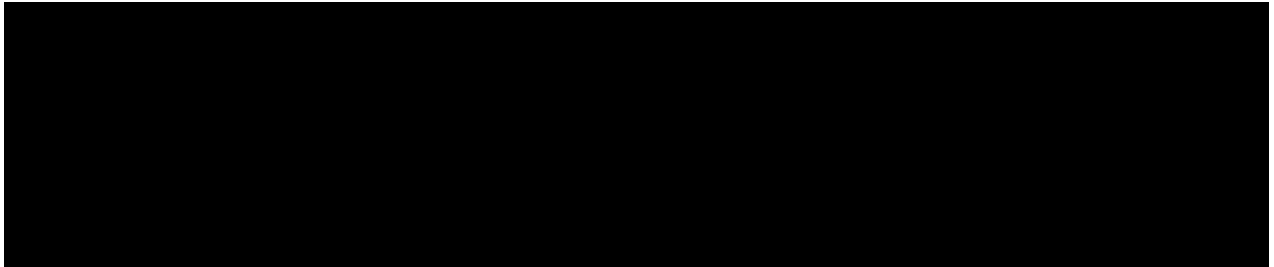
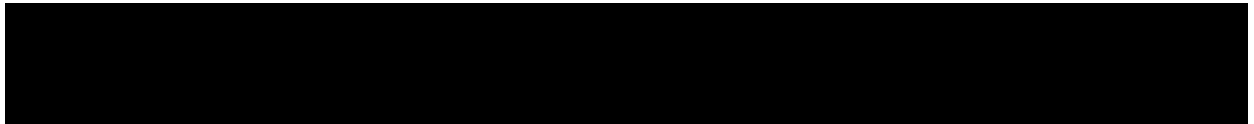
Department of Infrastructure, Transport
Regional Development, Communications, and the Arts
GPO Box 594
CANBERRA ACT 2601


Submitted via: <https://www.infrastructure.gov.au/have-your-say/national-urban-policy-australia>

Dear Minister,



Submission to the National Urban Policy





vision is for communities of the south east of Melbourne to be thriving, living a zero emissions lifestyle, and resilient to the changing climate. As such, our submission focuses on and is aligned with the Policy's Sustainable and Resilient goals, together with the objective "Our urban areas are sustainable". We recognise that the Policy's Sustainable and Resilient goals are cross-cutting in nature, and progress in these areas is likely to generate beneficial effects on the Policy's other goals, with the overarching aim of facilitating a national lift in the quality of life in our cities and urban areas.

Our submission focuses on four priority areas, together with accompanying recommendations for consideration in the next stage of developing the Policy's associated action plan:

1. Increase access to data and support for evidence-based risk assessments and decision-making
2. Embed and elevate climate change as a priority consideration at all levels of the state planning systems
3. Capture economic and resilience benefits through green infrastructure programs
4. Lead a multilevel governance approach to climate adaptation and resilience

submission provides evidence from a local government perspective and is structured based on the work we have completed with our member councils and stakeholders, particularly where it relates to urban planning and policy.

1. Increase access to data and support for evidence-based risk assessments and decision-making

The Policy identifies a suite of possible actions to develop a national approach to land use and development planning. Underpinning these actions is a requirement for more robust climate-focused evidence-based risk assessments and decision-making. Current planning practices at a precinct scale must take into greater consideration the longer-term impacts of climate change on future generations.

have progressed several projects to determine the current and future climate risks and vulnerability to council infrastructure, residential homes and vulnerable sub-populations in

Further, each asset class and sub-population identified in the scope of the work was assigned a vulnerability rating and spatial representation to understand

[REDACTED]

priority sub-populations and critical assets at greatest vulnerability. By association, the risks

[REDACTED] also affect non-council assets. Outlined below are two key projects, which are replicable and scalable to regions across both the state and the nation, and can help better inform climate-related urban planning.

1.1 Enhancing Community Resilience

The Enhancing Community Resilience (ECR) Project aimed to understand, prepare for and mitigate climate change impacts on the [REDACTED] vulnerable populations. The project centred on the development of tools and resources to inform the application of practical actions to help prepare communities for the projected change in their local climate. Ultimately these initiatives were intended to generate stronger community led responses and government decision-making, including the provision of new or improved services and facilities for communities pre-, during and post-extreme weather events.

Using the latest climate data in conjunction with established IPCC Assessment Report Climate risk frameworks, the project focused on using spatial analysis to better understand community resilience and build measures by identifying and mapping the vulnerability of those most at risk to climate change. By focusing on socio-spatial aspects of a vulnerable population such as the social, ecological, physical, institutional and economic situation, a holistic modelling framework was established – linking spatial analysis fundamentals with social science insights to map vulnerability in populations most at risk to climate changes.

While embedding these learnings is an ongoing process, several [REDACTED] members are now adjusting forward maintenance and infrastructure budgets to reflect changing infrastructure needs, such as increasing budget allocations to ensure infrastructure is maintained more often and built or replaced with more robust options.

[REDACTED]

Improved localised data on future climate scenarios that is up to date and accessible is critical to supporting local government to assess risk and mainstream adaptation action, creating more liveable, equitable, productive, sustainable and resilient cities and communities.



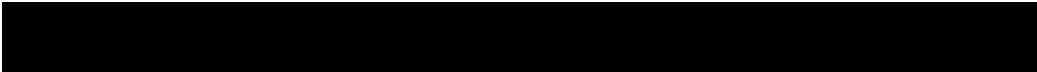
1.2 Asset Vulnerability Assessment

The Asset Vulnerability Assessment (AVA) project was aimed at assisting [redacted] member councils to better understand how their buildings, roads, drainage and open space will be impacted by climate change and associated extreme weather events.

Specifically, the project was aimed at assisting councils to understand how:

- climate change will impact particular assets;
- service delivery may be impacted by climate change;
- extra costs will be incurred to maintain and deliver assets and services without climate adaptation actions;
- extra cost will be incurred by councils in responding to climate-rated damages and insurance premiums;
- the expected costs compare to making assets resilient ; and
- council income streams may be impacted by climate change.

Through the case studies, the AVA project identifies how related council income and expenditure will be impacted, and provides guidance on how councils can appropriately plan, both financially and strategically, for the anticipated changes. By having a greater understanding of asset vulnerability and the potential financial impacts of climate change, councils can appropriately plan and cost work in order to make assets more resilient. In turn this will improve understanding of how climate change is likely to impact the delivery of community services. The project aligns with climate risk methodologies and standards such as the Climate Measures Standards Initiative (CMSI).



<p>Recommendation to the Australian Government</p> <p>1A. Funding for all Victorian councils to undertake risk and vulnerability assessments on:</p> <ul style="list-style-type: none">- their own assets (roads, drains, buildings and open space) and communities similar to the [redacted]
<p>1B. In collaboration with local government, state governments fund vulnerability assessments</p>

for all other community infrastructure assets (roads, drains, buildings and open spaces) including where appropriate critical infrastructure assets (eg. energy grid, communication towers, emergency services etc)

1C. Federal government to fund vulnerability assessments for all other community infrastructure assets including where appropriate critical infrastructure assets (airports, hospitals, schools etc). For example, through the Disaster Ready Fund.

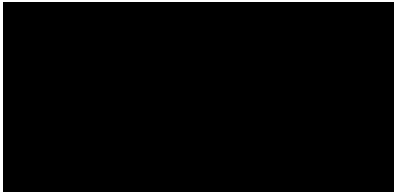
2. Embed and elevate climate change as a priority consideration at all levels of state planning systems

Given the urgency with which climate change must be addressed at multiple levels of government, the need for transformational adaptation is clear and it is imperative to elevate climate change within urban planning decision-making that is commensurate with the threat it poses. Climate change considerations must be made explicit and informed by best available data and climate change science.


The Policy makes clear that buildings and construction activities are significant contributors to urban emissions. [REDACTED] suggests the Government adopt a precinct or ‘cities’ approach to planning for a decarbonised industrial and commercial sector. What’s needed is a coordinated approach to decarbonisation in front of the meter, where significant energy efficiency measures are to be made. This supports the energy generators and distribution companies. Good national urban planning which supports significant energy network changes across all states and territories will increase Australia’s competitiveness, whilst driving down emissions and costs.

[REDACTED] highlights how electrification and decarbonisation can be achieved across a range of sectors for our region, presenting an opportunity to proactively and collaboratively position the region (and beyond) to prosper in a low emissions world.

In 2021, the Greenhouse Alliances partnered with the Council Alliance for a Sustainable Built Environment (CASBE) to commission a research report on [Climate Change & Planning in Victoria: Ensuring Victoria’s planning system effectively tackles climate change](#). This report identifies a disconnect between high-level policy positions on climate change, both by state



and local government, and the day-to-day decisions that are being made in Victoria's planning system.

The report outlines a raft of reform opportunities to be considered by the Australian Government in achieving sustainable growth for our cities. In particular,  recommends the following:

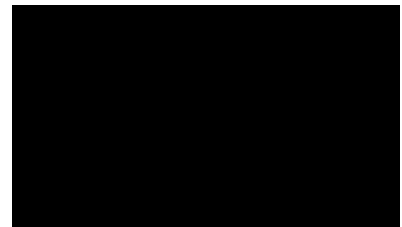
Recommendation to the Australian Government
2A. Requiring every planning scheme amendment, at all levels of government, and at all levels of the planning framework, to include an assessment against relevant climate change considerations.
2B. Introducing mandatory climate change related minimum standards into planning schemes.
2C. Adopting science-based targets for high level policy and aligning the planning system to the most up-to-date climate science.

3. Capture economic and resilience benefits through green infrastructure programs

The Policy highlights the importance of green and blue spaces in encouraging the uptake of active transport, mitigating the urban heat island effect, and encouraging biodiversity in our cities. However, current rates of development and approaches to site coverage are resulting in a high level of urban and regional vegetation clearance. Despite the best efforts of local government, vegetation is being cleared at a faster rate than can be replaced in the public realm.

The [*State of the Environment 2021 report*](#) shows that the environment is under extreme pressure, with a range of compounding threats (global warming, habitat loss, invasive species, pollution, and resource extraction).

The loss of vegetation is impeding the government's ability to capture both climate resilience and economic benefits from protecting and increasing green and blue infrastructure to reduce the risks associated with the urban heat island effect as temperatures increase. Additional funding is required to equip councils with the necessary resources to improve liveability and reduce impacts to natural hazards whilst supporting biodiversity in a changing climate.



More adequate resourcing for compliance and enforcement to prevent illegal clearing of existing green infrastructure is also required. Local governments face significant financial and resource barriers to undertake compliance and enforcement under the *Planning and Environment Act 1987*, particularly when a more serious penalty is warranted requiring prosecution at the Magistrates Court. This involves substantial time and a level of human and financial resources that most councils cannot afford.


Recommendation to the Australian Government

3A. Ensure the planning scheme supports the expansion of blue/green infrastructure as well as regulating native vegetation clearing in new property estates and on private land .

3B. Utilise heat island and social vulnerability data and biodiversity outcomes to target key areas for increased canopy and shrub cover.

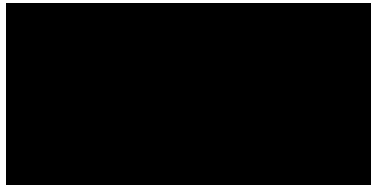
3C. Support delivery of a comprehensive community education and engagement, particularly around the protection of existing natural assets.

4. Lead a multilevel governance approach to climate adaptation and resilience


 supports the Policy’s first underpinning principle that city planning and governance must be collaborative and adaptive, particularly to achieve close alignment between local-level planning and community values, to the maximum extent possible.

Local governments play a critical role in driving climate adaptation, mitigation policy and action, as well as managing high value assets and services on behalf of communities. The local government sector brings a wealth of experience and knowledge to Victoria’s response to climate change, having spent decades driving adaptation and mitigation policies and programs for the benefit of local communities. However, councils are too often seen as only a vehicle for implementing policies set by state and federal governments, often fragmented and without adequate support and resourcing.

A multilevel governance approach that includes local, state, and federal governments – as outlined in the [Many Hands Make Light Work](#) report – would see more cohesive, unified work




between governments, with less duplication. This approach would help build a more resilient governance ecosystem by ensuring that councils have a seat at the decision-making table, and empowering all spheres of government to fulfil their climate resilience and emissions reduction goals through effective coordination and resourcing.

The  are also an established vehicle for coordination and collaboration at the regional level, assisting their member councils with internal capacity building, cross-council projects and research, and engagement with other levels of government and other sectors. We welcome further opportunities for strategic partnerships with the state and federal governments on adaptation policy co-creation and implementation for climate resilience.

Recommendation to the Australian Government

4. Lead the federal, state and local governments' work in re-setting roles and responsibilities through establishing a multilevel governance approach to climate adaptation that includes active participation by local councils across Australia.

 welcomes the opportunity to engage in further discussion and consultations on the National Urban Policy, together with participating in the crucial next step of action and implementation planning.

Sincerely,

