

3 July 2024

A National Urban Policy for Australia

Department of Infrastructure, Transport, Regional Development,  
Communications and the Arts  
Cities and Suburbs Unit  
Partnerships and Projects Division

Dear National Urban Policy Team

**RE: The National Urban Policy – Consultation Draft**

The Council Alliance for a Sustainable Built Environment (CASBE) welcomes the reconsideration of the *National Urban Policy* and the opportunity to provide a response to the *Consultation Draft*.

**BACKGROUND**

CASBE is an association of Victorian councils committed to ensuring future generations can enjoy a sustainable built environment, by seeking sustainable design outcomes through the statutory planning / development application approvals process. **CASBE member councils represent 80% of Victoria's population.** You can find a complete list of our 42 members at <https://www.casbe.org.au/who-we-are/membership/>.

CASBE's vision is:

*Metro cities, regional cities and towns are sustainable, thriving, and operate in harmony with social and ecological systems.*

CASBE provides a forum for the exchange of information, and ideas on innovation and best practice in Environmentally Sustainable Development (ESD). Our local, ground-up approach has resulted in collaborative local government led action, broad scale positive change to Victoria's built environment, and a significant reduction to its consequent environmental impacts.

CASBE's work directly aligns with the United Nations Sustainable Development Goals 11: Sustainable cities and communities and 13: Climate Action. Our strategic goals are mapped against the targets under these goals.

## **NATIONAL URBAN POLICY**

CASBE supports the five key goals of the draft National Urban Policy, and the associated objectives and principles. We support and welcome the inclusion of the two new goals, **equity** and **resilience**.

The vision for the National Urban Policy must consider the impact of climate change on the built environment. The impacts brought about by our changing climate are the greatest challenge humanity has faced. A climate resilient approach to the built environment will support equity, in that all people will have access to resilient places of habitation and work, and it will support long term affordability, in that resilient buildings are more likely to withstand the extreme climate events forecast as a result of the changing climate.

The consultation process seeks ideas from ‘the bottom up’. We acknowledge that the Federal Government is working on a National Adaptation Plan and has released a Roadmap for Net Zero for the built environment. We support these initiatives and look forward to the opportunity to provide input in the Built Environment Net Zero Plan.

However, more ambitious action is needed at the Federal and State Government level to effectively mitigate the impacts of climate change. The Victorian Government has set a target of achieving net zero emissions by 2045, while the Federal Government plans to reach net zero by 2050. Both these targets fall well short of the latest science which demonstrates Australia needs to strive for net zero by 2035 to keep warming at the safest levels now possible.<sup>1</sup>

**Business as usual in urban policy is not enough.** The three levels of Australian government must join forces to develop a sharp focus on implementing an immediate pathway to zero emissions, climate resilient building, and the adaptation of our existing built environment to achieve the same outcomes. Our submission below outlines specific strategies for achieving these outcomes.

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<sup>1</sup> [https://www.climatecouncil.org.au/wp-content/uploads/2023/09/Mission-Zero\\_Updated-190923\\_IL\\_2.pdf](https://www.climatecouncil.org.au/wp-content/uploads/2023/09/Mission-Zero_Updated-190923_IL_2.pdf)

## **CLIMATE RESILIENT CITIES AND TOWNS**

The Federal Government is aware of the significant challenges facing the planning of Australian cities and towns - population growth, congestion, housing affordability, social inequity. Our submission will focus on the challenges facing our built environment, and those using it, from the impacts of climate change. This aligns with two key goals of the National Urban Policy:

### *Sustainable*

*Where governments, industry and community work together to appropriately plan for urban growth, reduce emissions, promote a circular economy and adapt to climate change to ensure that our urban areas meet the needs of diverse communities and that our natural environments are rehabilitated for future generations.*

### *Resilient*

*Where our cities are economically, socially and environmentally resilient to the impacts of change, including changing climate and increasing exposure to climate-related hazards.*

Climate change is occurring much faster than climate models have forecast. Urgent action is required to support a transition back to a safe climate. This involves:

- The immediate cessation of greenhouse gas emissions. For the built environment this involves a zero emissions approach for both embodied and operating emissions.
- Immediate efforts to draw down carbon. For the built environment this involves funding and research with a focus on immediate implementation to support the use of materials that support draw down efforts.
- Introduction of global cooling efforts such as greening and reflective surfaces.<sup>2</sup>

## **Resilient building design**

One of the main risks facing Australians is that our legislative frameworks continue to allow the construction of buildings and infrastructure that are ill prepared for the scientifically predicted weather events that are likely to occur as a result of the changing climate.

A resilient building design is one which considers the likely extreme weather events for that area and responds accordingly. For example:

- Increased heatwaves – the building is designed to be thermally comfortable during heat waves and in the event of a power outage.
- Power outage – the building is designed to remain functional during a heatwave with a power outage. This may include having the capacity to switch to the use of renewable resilient (eg off grid) power supplies.
- More extreme storm events – the building is designed to structurally withstand more extreme storm events.

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<sup>2</sup> Accelerating Climate Disruption and the strategy to reduce, remove and repair, Breakthrough – National Centre for Climate Restoration, August 2023.  
[https://www.breakthroughonline.org.au/\\_files/ugd/148cb0\\_e9e83f488f704fe79dee62a91b0353ca.pdf](https://www.breakthroughonline.org.au/_files/ugd/148cb0_e9e83f488f704fe79dee62a91b0353ca.pdf)

- Coastal storm surge – buildings are structurally designed to withstand coastal storm surge or are prevented from building in at-risk areas.
- Drying and warming trends – our buildings are able to capture and store rainwater. For areas where it is expected that rainfall will reduce, water security will become increasingly important. Rainwater tanks contribute to water security and management of flow during heavy rain events.

The Victorian Government's *Built Environment Climate Change Adaptation Action Plan 2022–2026* identifies the need to build in resilience. The plan states that:

*“...new development must be built to factor long term resilient needs to avoid future adaptation.”*

and

*“Given the built environment’s long life, it is important to factor adaptation into planning and management to reduce the need for upgrades and retrofits.”*

CASBE supports these statements. The Elevating ESD Targets Planning Policy amendment put forward by 24 Victorian councils (refer below) seeks to introduce planning provisions that improves the climate resilience of buildings, including strategies that improve the performance of the building envelope, reduce urban heat, improve stormwater management and remove operational carbon emissions.

### **Principles for a resilient and adaptable built environment**

We know the actions needed to move towards a resilient built environment. The World GBC's flagship Health and Wellbeing global programme Better Places for People (BPPF) has partnered with the UN High-Level Climate Champions and C40 Cities to produce a *Climate Change Resilience in the Built Environment Guideline* which outlines the principles of a resilient built environment. We provide an extract from this guideline here:

*“The principles for a resilient and adaptable built environment are given at city, neighbourhood and building scale. They include:*

#### *City scale*

- *Adopt land use policies and regulations to reduce/prevent development in high risk areas, and incentivise development in lower risk ones.*
- *Assess most vulnerable locations to focus priority interventions – pay close attention to vulnerable locations, particularly informal settlements, and aspire to transform slums into healthy, clean and safe communities.*
- *Assess the risk of climate change on physical assets and infrastructure and system stressors through future scenario modelling and risk assessments that consider the lifespan of an asset, including risk of stranded assets.*
- *Set building regulations or guidelines to target specific climate risk, eg. guidelines for better buildings can reduce storm damage. New building standards should be able to be resilient to changing extreme weather conditions.*

#### *Community and neighbourhood scale*

- *Protect and invest in natural resources, such as protecting ponds, lakes, and rivers nearby from over-extraction and pollution, and investing in water storage for emergency situations. Sustainable drainage solutions and green infrastructure techniques, such as planting moisture-loving plants and trees and installing permeable hard surfacing to absorb excess water that can support resource management, for example by allowing infiltration to support groundwater levels.*
- *Consider community scale-built asset upgrades and retrofit to improve resilience of community assets in case of severe climate events, such as community level master-planning to implement passive shading techniques, including narrow streets to create shade, expanding urban tree cover to combat urban heat island impacts and fire breaks to act as a buffer between natural and residential zones.*
- *Plan community emergency hubs that will provide access to safe space and services during extreme weather events and prioritise establishing community protocols and maintaining evacuation pathways.*

#### *Building scale*

- *Implement passive design and retrofit techniques – to mitigate extreme heat – northerly orientations, building or adding semi-permanent shading devices, deciduous tree shading, shutters, light colour roofs, overhangs and utilising thermal mass, and avoid large volumes of glazing (on south or north-facing aspects and facades depending on the global north or south regions), or to mitigate extreme cold – capture residual heat with thermoelectric generators and heat exchangers, install passive systems including rooflights and reflective surfaces to increase solar gain, or increase air tightness or wall cladding and glazing insulation and quality to reduce heat loss.*
- *Adopt backup strategies at building scale in case of extreme weather events such as off-grid, decentralised and resilient energy supply.*
- *Design for durability, disassembly and maintenance, such as planning for climate appropriate structures and urban layouts to prevent damage, considering techniques in which the building can withstand floods, fire, storms, heat waves, and other climate change events.”<sup>3</sup>*

State land use planning policy, supported by a National Urban Policy, has the potential to respond to these principles, in particular:

- Adopt land use policies and regulations that prevent development in high-risk areas.
- Introduce detailed ESD policy for buildings to ensure thermal comfort during extreme heat events.
- Introduce light coloured roof policy, where appropriate, to mitigate the urban heat island effect.
- Introduce detailed policy that supports buildings and urban layouts to withstand extreme weather events.

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<sup>3</sup> [https://www.c40knowledgehub.org/s/article/Climate-change-resilience-in-the-built-environment-Principles-for-adapting-to-a-changing-climate?language=en\\_US](https://www.c40knowledgehub.org/s/article/Climate-change-resilience-in-the-built-environment-Principles-for-adapting-to-a-changing-climate?language=en_US)

## Local Government policy solutions – Elevating ESD Targets Planning Amendment

For more than a decade, CASBE member councils have been developing policy to expand the Business-as-Usual approach to urban policy, to also consider strategies that mitigate, address or protect the environmental issues and challenges we face.

In July 2022, twenty-four Victorian councils, supported by CASBE and the Municipal Association of Victoria (MAV), lodged a request for an amendment to Victorian planning schemes to elevate sustainability requirements for new buildings. This amendment, known as the Elevating ESD Targets Planning Policy amendment, seeks to introduce planning provisions that elevate sustainability requirements for new buildings, encourages a move towards net zero carbon development and supports the transition to a climate resilient built environment.

The proposed policy objectives cover many sustainability issues; however, we draw your attention to two objectives that address zero carbon and urban heat as follows:

- *To ensure new development achieves net zero carbon emissions from operational energy use.*
- *To deliver development that reduces the urban heat island effect.*

The amendment also comprises a series of measurable standards to achieve these objectives, including:

### *Standard A3*

*All development should be designed to reflect the following hierarchy in achieving net zero carbon emissions from all operational energy use:*

- *Design buildings to be all-electric;*
- *Design building orientation, envelope and openings to increase energy efficiency;*
- *Selection of energy efficient systems, equipment and appliances;*
- *Onsite generation of renewable energy;*
- *Purchase of offsite renewable energy.*

### *Standard F1*

*Provide at least 75% of the development's total site area with a combination of the following elements to reduce the impact of the urban heat island effect:*

- *Green infrastructure.*
- *Roof and shading structures with cooling colours and finishes that have a solar reflectance index (SRI) of:*
  - *For roofing with less than 15 degree pitch, a SRI of at least 80.*
  - *For roofing with a pitch of greater than 15 degrees, a SRI of at least 40*
- *Water features or pools.*
- *Hardscaping materials with SRI of minimum 40.*



This policy is ready to test via the exhibition process.

While state-wide ESD reforms to the Victoria’s planning system are a necessary and equitable sustainability and resilience strategy for Victoria, and indeed in other states in Australia, we note that the twenty-four Victorian CASBE member councils who lodged a request for authorisation of the *Elevating ESD Targets Amendment* with the Department of Transport and Planning in July 2022 are still waiting for a response, almost two years later. This demonstrates the challenge experienced by local government to bring into effect climate responsive planning policy.

### **Climate Change and Planning in Victoria report**

In 2021, CASBE partnered with the Victorian Greenhouse Alliances to commission a research report entitled *Climate Change & Planning in Victoria: Ensuring Victoria’s planning system effectively tackles climate change*.<sup>4</sup>

This project arose as a result of the 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.

While the broader focus of this research was on changes that are relevant to the environment in which decision-makers operate, with a particular focus on decision-makers at local government level, a number of more specific focus areas have been identified to guide the recommendations of this report. They represent the link between the initiatives recommended and the barriers identified and encapsulate the findings of both the analysis and engagement, as follows:

#### *Aligning planning with best practice and science*

Planning Schemes currently speak to the need to identify at-risk areas using the best available data and climate change science. Specific policy benchmarks stated in the schemes therefore need to be consistent with the “best available data and climate change science.” These benchmarks and standards need to be kept up to date to provide clear guidance for decision-makers.

This is the purpose of the Elevating ESD Targets Planning Scheme Amendment – to lift the targets for the built environment to align with what science and experts are telling us.

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<sup>4</sup> <https://casbe.wpenginpowered.com/wp-content/uploads/2024/06/Final-report-Climate-Change-and-Planning-in-Victoria-November-2021.pdf>

### *Shifting the balance of decision-making*

'High level' legislative obligations are important in driving change at the more fine-grained level. Planning is structured to flow from legislative requirements to objectives, which are then supported by the application of zones and overlays and the articulation of strategies. In turn, these are implemented by standards and guidelines. Failing to include, as part of legislative obligations, robust and comprehensive references to climate change, and to highlight the key role decisions made within the planning system play can compromise support for climate action.

How we live our lives is strongly influenced by the places we inhabit, and these are the remit of planning. Ensuring that these places are focused on the twin goals of adaptation and mitigation has the potential to make a significant contribution to global objectives in responding to climate change.

### *Supporting statutory decision-making*

Statutory planners and other decision-makers need specific content in Planning Schemes to support them in delivering climate responsive outcomes. If there is no reference in the scheme, the ability to deliver particular outcomes is compromised and inconsistent and relies more heavily on individual decision-making and capacity.

In addition, planning relies heavily on the presence of a permit trigger for there to be any relevant assessment of the appropriateness of an application. If there is not a permit trigger which relates to the issue within the Planning Scheme, there is no opportunity for a decision to be made on the matter through the planning system.

### *Making climate change considerations explicit*

In responding to climate change, planning needs to look to the longer-term impacts and requires greater consideration of the impacts on future generations. This is sometimes incompatible with other objectives of planning and with the interests and obligations of some decision-makers. Climate change considerations must be made explicit, or they will continue to be overlooked in favour of policy considerations that are more explicitly spelled out within Planning Schemes.

### *Supporting strategic decisions*

Climate change needs to be more strongly integrated into the documents and frameworks. As a result, in some cases, work can be undertaken to plan for places like activity centres and land can be rezoned, without paying particular attention to the impact on either mitigation and / or adaptation goals. Improving the robustness of the integration with strategic planning sets the groundwork for long term responses.



### *Planning for climate resilient communities*

Current planning practices at precinct scale, including huge areas of greenfield development, as well as more standard subdivisions, are failing to take into consideration the scale of change needed to standard practice. This is a key barrier, as once these foundations are set through the subdivision and precinct planning stages, they are very difficult to change or to retrofit. Many of these areas will still be developing when a net zero target is envisaged to be met.

### *Integrating climate change actions*

Adopting integrated responses and avoiding ‘siloeing’ is critical to addressing climate change. A current lack of integration between planning and other areas of government addressing adaptation planning, across various portfolios and departments, has been identified as a barrier. In addition, the current practice of including references to large and complex Policy Documents to “consider as relevant”, without explicitly extracting content relevant to planning and including this within Planning Schemes, means many key parts of government policy are being poorly applied through the planning system. Explicit attention is needed to integrate policy content on climate action into the planning system.

### ***Recommendations for the Australian Government:***

- Adopt science-based targets for high level policy and align planning systems to the most up to date climate science.
- Support the adoption of land use policies and regulations that prevent development in high-risk areas.
- Support the introduction of detailed ESD planning policy for buildings to ensure thermal comfort during extreme heat events. [This could be achieved by progressing the Elevating ESD Targets Planning Scheme Amendment in Victoria.](#)
- Support the introduction of light coloured roof planning policy to mitigate the urban heat island effect, where appropriate. [This could be achieved by progressing the Elevating ESD Targets Planning Scheme Amendment.](#)
- Support the introduction of detailed planning policy that supports buildings and urban layouts to withstand extreme weather events.
- Support the introduction of detailed planning policy that requires the expansion of urban greening and biodiversity.
- Support a public conversation about the complexities of housing affordability, and the long-term affordability of resilient building design.
- Actively support the development of policy options for housing affordability such as not for profit housing development, and housing policy that supports tenants.

## **THE IMPORTANCE OF LOCAL GOVERNMENT IN PLACEMAKING**

The key to a successful National Urban Policy is effective implementation.

We understand that the Federal Government does not have the constitutional mandate to implement urban policy, however it does have the capacity and resourcing to bring levels of government together to develop joint positions and realise plans and actions.

Local government have a critical role in the development of the built environment, and through their strong connection with community, a critical role in driving climate action. However, even when councils work collaboratively, exemplified by the CASBE case study, effective policy change remains difficult to bring about without state government support.

Given the accelerated climate change that is occurring, and the incredibly resource intensive efforts by local government to bring about change from the 'bottom up', we call upon the Federal Government to facilitate an urgent national response to a climate risk assessment driven response to urban policy, one that places and resources local government at the centre of the response.

We add our voice to the feedback you have already received on the need for greater clarity on:

- Proposed governance structures, and the role the Federal Government will play in the implementation of climate resilient urban policy.
- Strong implementation pathways, and the opportunity for local government to introduce policy where state policy targets are inadequate.
- Deeper links to First Nations country and communities.

### ***Recommendations for the Australian Government:***

- Support local government by funding future community services and infrastructure.
- Elevate Federal Government engagement with local government.
- Expand and formalize local government involvement and contribution to the draft policy.
- Provide further details on how the policy will be implemented, with regard to where and how Federal Government investment will be made to deliver outcomes that align with the policy, highlighting where there might be legislative inconsistencies.

## **CASBE – A CASE STUDY**

The Federal Government considers the Urban Design Policy to be a call to action rather than a top-down declaration of intent. To this end, we provide for your information the following case study of CASBE, an alliance of Victorian councils that has been working on sustainable urban form policy for many years. We believe our work meets the goals of the National Urban Policy.

### Local ESD Policy

A key aspect of CASBE's work has been to facilitate the introduction of local planning policy that requires Environmentally Sustainable Development (ESD) design strategies to be considered by the community when undertaking development projects. There are now 27 Victorian Councils with this local ESD policy for buildings, and even more utilising the methodology and purpose-built tools aimed at delivering ESD outcomes through the planning system.

### Elevating Targets amendment

In July 2022, twenty-four Victorian councils, supported by CASBE and the Municipal Association of Victoria (MAV), lodged a request for an amendment to Victorian planning schemes to elevate sustainability requirements for new buildings. The goal of the project is to better protect the natural environment, reduce resource and energy consumption, and support the health and wellbeing of future occupants through effective planning policy for the built form. These amendments are currently waiting for authorisation to exhibit from the Minister for Planning.

### Sustainable Subdivisions Framework

The Sustainable Subdivisions Framework (SSF) was developed as a state-wide replicable model through a collaboration of regional and growth area councils with a focus on greenfield subdivisions. The SSF seeks to mitigate the impacts of future climate projection scenarios, creating sustainable and liveable subdivisions that can adapt to the changing climate. There are currently 21 Victorian councils utilising the SSF, with the support of three shared services Sustainable Subdivisions Advisors across 18 of the councils.

Federal funding for the next stage of the SSF project would be an effective example of how the Federal Government could support local government in implementing climate resilient policy.

**The CASBE projects identified above, in addition to many valuable examples of planning work occurring in our member councils, are practical examples of a move towards climate resilient and sustainable urban policy.**

## **PLANNING MINISTERS' MEETING**

We note the work occurring with the Australian Government and the jurisdictional Planning Ministers, and the outcomes from the February 2024 Planning Ministers Meeting.

We strongly recommend a sharp and urgent focus on the development of national principles for considering disaster and climate risk as part of land use planning. It is imperative that long term climate impacts of a given area be taken into account in any development that occurs.

**'What we build, where we develop, how we live and how we make decisions must adjust'**

**'Given the built environment's long life, it is important to factor adaptation into planning and management to reduce the need for upgrades and retrofits.'**

*Victoria's Built Environment Climate Change Adaptation Action Plan 2022–2026*

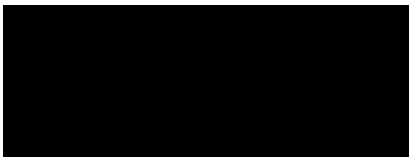
### **Recommendations for the Australian Government:**

- Develop, as a matter of urgency, national principles for enabling state and local governments to update state and territory land use planning systems to respond to the risks and adaptation impacts of climate change.

CASBE also supports the submission made by the Municipal Association of Victoria (MAV).

Thank you for taking the time to consider our submission. We would be delighted to expand on any of the above points. I can be contacted on 03 9667 5555 or [casbe@mav.asn.au](mailto:casbe@mav.asn.au).

Yours sincerely



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CASBE member councils include:

City of Ballarat	Hepburn Shire Council	City of Moonee Valley
Banyule City Council	Hobsons Bay City Council	Mornington Peninsula Shire Council
Bass Coast Shire Council	Hume City Council	Mount Alexander Shire Council
Bayside City Council	Indigo Shire Council	Murrindindi Shire Council
Boroondara City Council	City of Kingston	City of Port Phillip
Brimbank City Council	Knox City Council	City of Stonnington
Cardinia Shire Council	Manningham City Council	Strathbogie Shire Council
Darebin City Council	Maribyrnong City Council	Warrnambool City Council
East Gippsland Shire Council	Maroondah City Council	Whitehorse City Council
Frankston City Council	City of Melbourne	City of Whittlesea
City of Glen Eira	City of Melton	City of Wodonga
City of Greater Bendigo	Merri-bek City Council	Wyndham City Council
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