

29 August 2024

Plan for Victoria project team

Department of Transport and Planning

1 Spring Street, Melbourne, VIC 3000

Via e-submission

To whom it may concern,

Re: Plan for Victoria consultation

On behalf of our members, the Victorian Greenhouse Alliances (VGA) welcome the opportunity to respond to the Victorian Government's new Plan for Victoria.

The Victorian Greenhouse Alliances are formal partnerships of local governments and statutory agencies driving climate change action across Victoria's municipalities. The Alliances deliver regional climate mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual councils and agencies. Our project work is complemented by targeted advocacy, capacity building activities and regional partnerships.

Our submission will focus on the opportunities to accelerate the transition to net zero emissions and strengthen community resilience to climate change. A collaborative approach between State and local governments is needed to deliver these climate outcomes within the new housing targets and vision for Victoria. Importantly, targeted funding support for councils would assist in effective planning and enforcement, which is often constrained by rate capping.

We urge the department to consider the following recommendations:

Recommendation 1. Ensure that housing development adequately considers projected climate hazards and risks, including:

- **Adoption of the recommendations from the Hansen's Climate Change and Planning in Victoria report**
- **Support for and a consistent state-wide approach to local climate risk assessments**
- **Guidelines and support for the incorporation of climate data into municipal planning scheme amendments**

We support that greater protections from flooding, bushfire and climate hazards are one of the eight Big Ideas arising from the engagement process to date. Looking to the future, new housing developments must be appropriately planned and built in the context of projected mid- and longer-term climate change impacts such as flooding, coastal inundation and bushfires. Implementing a unified, state-led planning approach is crucial to effectively managing climate hazards, and would avoid reliance on divergent localised methodology used to assess climate risks.



We welcome the March 2024 amendments to Victoria’s Planning and Environment Act that require consideration of increased resilience to climate change when making decisions about the use and development of land under the Act and for other purposes. This was one of the key recommendations in the VGA’s Planning for a Safe Climate campaign and associated Hansen Report.¹ We urge that other recommendations from the Hansen Report are adopted, including ensuring that the Victorian Planning Schemes are consistent with the scientific evidence base and that relevant datasets are updated to reflect current scientific understanding of hazards. The incorporation of flood studies (i.e. consistent spatial maps of depths and extents under climate change) into planning schemes was also a recommendation of the Victorian Inquiry into the 2022 Flood Event in Victoria.²

As it stands, there are still major challenges for councils and the State Government in practically addressing climate risk in planning. To inform appropriate planning and zoning decisions, data must be gathered, interpreted and reported on current and future climate risk. We recommend that the State Government support local governments in undertaking climate risk assessments in all municipalities, via funding support and guidelines demonstrating a consistent risk assessment methodology. A more consistent method across the state in assessing climate risk is needed, and this could also be coordinated at a regional level.

Councils are also faced with community and developer pushback when using climate data to inform planning scheme amendments, such as flood overlays, with fears raised about the impact on housing values and insurability. On the other hand, councils are liable if they do not take into account climate risk and allow inappropriate developments. We ask that the Victorian Government work with councils to ensure they are supported through these complex issues and in navigating planning decisions in the context of climate data. This can be achieved by adopting statewide guidelines and planning frameworks for the incorporation of climate data into planning scheme amendments, alongside training for council officers and councillors.

Plan for Victoria is an opportunity to ensure that strategic and critical public infrastructure is upgraded or built to mitigate the impacts of climate hazards on vital health and human services assets during extreme events. A network of cool spaces can also create important informal places of refuge from extreme weather events.

Recommendation 2. Utilise this as an opportunity to create a roadmap to zero carbon buildings by 2030 in Victoria, including:

- **Adoption of the Elevating ESD Targets Planning Policy Amendment**
- **Full and timely implementation of the ESD roadmap**
- **Support and resourcing for the Sustainable Subdivisions Framework**
- **Work with local governments in managing the risks of non-compliance**
- **Prioritise and set targets for the use of low carbon materials**

¹ <https://hansenpartnership.com.au/climate-change-and-planning-in-victoria-report/>

² <https://www.parliament.vic.gov.au/get-involved/inquiries/floodinquiry/reports>



Plan for Victoria is a key opportunity to articulate how the building sector can be decarbonised, and guide a future with sustainable, energy efficient housing powered by renewable energy. Energy efficient housing is a key metric for affordable homes, which is on the list of top priorities for Victorians. Within this context, the Victorian Government should ensure that equity of access to liveable and energy efficient housing is prioritised by directly investing in energy efficient social and public housing, and ensuring increased minimum energy efficiency standards for renters.

We congratulate the Victorian Government on recent reforms including ending gas connections in new dwellings, and supporting 7 Star minimum efficiency standards in the National Construction Code. The amendments to the *Planning and Environment Act 1987* and the *Climate Change Act 2017* to establish high-level support for net zero emissions and to consider climate change in planning decisions showcase the Victorian Government's commitments to a zero emissions pathway.

A critical next step in implementing these policy changes within planning decisions is the approval of the Elevating ESD Targets Planning Policy Amendment³. This was lodged with the Minister by 24 councils, over two years ago in July 2022. This would advance how Environmentally Sustainable Development (ESD) is addressed in the planning system, ensure new developments would produce net zero carbon emissions, deliver savings for households through energy efficiency, and provide healthier and more comfortable buildings.

The full and timely implementation of the ESD Roadmap⁴ is also needed. Councils are particularly interested in the progression of stage two of the roadmap, which is meant to provide more detailed policy for local conditions. Councils have delayed development and implementation of municipal ESD policies in anticipation of the state policy. Ongoing communications between the State Government and local governments is required to enable policy implementation in a timely fashion.

Recognising the ability of subdivision planning to positively impact long-term sustainability and climate resilience of housing at scale, over 30 Victorian urban growth and regional councils have been developing, trialling and resourcing the Sustainable Subdivisions Framework (SSF)⁵ with the development community since 2020.

The Victorian Government's target of 2.24 million new homes by 2051 will require that rural, regional and metropolitan councils have the capability and capacity to enforce compliance to approved planning permits. We urge the State Government to assist local government to manage the risks of non-compliance and ensure that ESD provisions within the Victorian Planning Scheme are implemented for new subdivisions and buildings.

New building stock and the associated road and footpath infrastructure, particularly in greenfield, brownfield and infill developments, is also an opportunity to prioritise and set targets for the use of low carbon materials, such as low carbon cement and green steel, and high recycled content asphalt.

³ <https://www.casbe.org.au/elevating-esd-targets/>

⁴ <https://www.planning.vic.gov.au/guides-and-resources/strategies-and-initiatives/environmentally-sustainable-development>

⁵ <https://www.casbe.org.au/what-we-do/sustainable-subdivisions/>



Recommendation 3. Ensure housing development considers biodiversity and blue-green infrastructure opportunities, including:

- **Ensure conservation and biodiversity data underpins planning for the expansion of housing into regional and suburban edges**
- **Incorporate water sensitive urban design and plan for long-term water usage that accounts for future climate conditions**
- **Maintain and increase urban green spaces, canopy cover and watercourses through planning tools such as the ResCode, and strengthen planning reforms for open space and infrastructure contributions from private developers**

In delivering the targets for 2.24 million new homes by 2051, the expansion into regional areas and suburban edges must be planned to limit biodiversity impacts. Decision making should be underpinned by data mapping areas of high biodiversity and conservation value, with a commitment to protection and the preservation of landscape connectivity. First Nations cultural knowledge should be embedded into biodiversity and conservation strategies underpinning planning, in partnership with local and regional First Nations organisations. In regions where agriculture and food production compete with residential development for water, water sensitive urban design must be prioritised in developments, and partnered with water banking technologies which benefit a climate-resilient future for Victoria’s food production and regional communities.

Within the urban context, maintaining and increasing green spaces, urban tree cover and watercourses should be prioritised, with improved canopy cover targets for both public and private land. The approval and implementation of the Elevating ESD Targets Planning Policy Amendment³ would ensure new developments deliver improved quality and quantity of open space. It is also important to strengthen planning tools by expanding tree canopy requirements within residential development provisions (ResCode) and implementing a state-wide approach for its monitoring and compliance. This is critical for ensuring liveable neighbourhoods within a warming context, with most suburbs across Victoria already heavily impacted by the urban heat island effect. The ecological services of blue-green infrastructure are critical for healthy communities, biodiversity gains, flood mitigation, and shading and cooling our warming suburbs and townships. We recommend that the VGA and Municipal Association of Victoria’s evidence based principles for policy makers⁶ are considered in approaches to enhancing urban greening.

A key challenge for councils in this is compliance and enforcement. Developers often forgo the bond for greening requirements as these are less expensive than implementing the landscaping requirements. Planning reforms to open space and infrastructure contributions are required so that private developers equitably share the financial burden to support the open space demand generated by their new developments. There is also the challenge of permitted destruction of native vegetation, with Victoria’s regional areas losing large numbers of native trees on private land because of the many exemptions in the Victoria Planning Provisions that allow residents to destroy them without a permit. As our residential areas expand it will be critical to protect the climate-

⁶ <https://app.box.com/file/1025756916104?s=nyatnmmm5xlkt5jrfxyzgwa41qk3zn>



resilience services this vegetation provides by reconsidering these exemptions and supporting effective compliance and enforcement through local government.

Recommendation 4. Ensure connectivity and low emissions transport options are prioritised, including:

- **Prioritise the mode shift to active transport with increased, safe and appropriately located walking and cycling infrastructure**
- **Expand and increase the frequency and reliability of Victoria’s public transport system, including non-radial transport**
- **Support the EV transition through an increase in strategically placed EV charging infrastructure and public charging hubs**

It is critical to ensure low and zero emissions transport infrastructure is prioritised within current and expanding neighbourhoods. This should include an emphasis on the mode shift to active transport, with increased and appropriately located walking and cycling infrastructure that seamlessly interconnects where people live with activity hubs and public transport. It is also important that additional housing is prioritised within the walkable 800-meter catchment of activity centres. This new Plan for Victoria provides an opportunity for the Victorian Government to build on and expand further the new cycling infrastructure committed to in The Victorian Cycling Strategy 2018-2028, in consultation with local government. Stronger regulation, incentives, and financial contributions from State Government would support councils in contributing to the Victorian targets for 25% of trips being walking or cycling by 2030. A Movement and Place Framework should be also implemented to prioritise the safety and road space needs of active transport users over increasing road capacity for private motor vehicles.

Greater access to public transport is acknowledged as one of the key priorities for Victorians. Investment will be needed to expand public transport in new neighbourhoods, but current public transport options are also critically inadequate, non-existent and unreliable in existing peri-urban, rural and regional areas. With the exception of some of our largest regional cities, people in regional Victoria are forced to drive into Melbourne or regional hubs for critical healthcare, work, and connection to other travel modes. Victoria’s public transport must expand to accommodate population growth, with an extended and interconnected network of electric trains, light rail and buses, as well as improvements to service frequency. Improved non-radial transport is required to help suburbs link with each other and enable people to reach jobs and services in adjacent suburbs and transport routes. Plan for Victoria is also an opportunity to ensure the integration of electric and green hydrogen-fuelled buses into the fleet.

Providing changes to clause 52.06 of the Victoria Planning Provisions to remove or reduce parking minimums or introduce parking overlays near higher order public transport and activity centres would help encourage more affordable housing and reduce the costs of transport for the community. This would also encourage more dense housing in these areas, providing more opportunity to house the community closer to their workplaces.



Strategies to support the EV transition now rapidly on the rise should include an increase in strategically placed EV charging infrastructure across the state, public charging hubs for housing with no off-street parking, and enacting Zero Emissions Zones in the central metropolitan Melbourne zone. This would see far lower air pollution in our city. Many councils have led or supported the roll out of chargers in their municipalities in order to kick-start the EV transition, but it is important to recognise that the implementation of EV charging infrastructure isn't universally considered as a local government responsibility. Going forward, external funding or market intervention to install EV chargers is required, particularly in regional and rural areas. While the transition to EVs is set to reduce car-based emissions, a balanced approach is needed to reduce the reliance of motor vehicles and ensure that EV adoption complements improvements in active and sustainable transport infrastructure.

The Victorian Greenhouse Alliance would welcome the opportunity to further consult with the Victorian Government on this key opportunity to plan for zero emissions, resilient and connected Victorian communities, leveraging the respective capabilities, expertise, and resources of both levels of government.

Greenhouse Alliances and contacts

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 - Golden Plains Shire
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 - Buloke Shire Council
 - Central Goldfields Shire Council
 - Gannawarra Shire Council
 - Greater Bendigo City Council
 - Hepburn Shire Council
 - Loddon Shire Council



- o Macedon Ranges Shire Council
- o Mildura Rural City Council
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 - o Moira Shire Council
 - o Murrindindi Shire Council



- o Towong Shire Council
- o Strathbogie Shire Council
- o Wangaratta Rural City Council
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 - o Hobsons Bay City Council
 - o Melton City Council



- o Moonee Valley City Council
- o Moorabool Shire Council
- o Wyndham City Council

This letter has been approved through the Greenhouse Alliances governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.

