Victoria's draft Adaptation Action Plans 2027-2031

July 2026

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This submission has been jointly prepared by the:

- Municipal Association of Victoria (MAV)
- Council Alliance for a Sustainable Built Environment (CASBE)
- Association of Bayside Municipalities (ABM)
- Barwon South West Climate Alliance (BSWCA)
- Central Victorian Greenhouse Alliance (CVGA)
- Eastern Alliance for Greenhouse Action (EAGA)
- Gippsland Alliance for Climate Action (GACA)
- Goulburn Murray Climate Alliance (GMCA)
- Northern Alliance for Greenhouse Action (NAGA)
- Western Alliance for Greenhouse Action (WAGA)

The Municipal Association of Victoria (MAV) is the legislated peak body for local government in Victoria, advocating for all 79 councils across the state.

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the traditional custodians of the land on which we live. We recognise their continuing connection to land, waters and culture and pay our respects to their Elders past, present and emerging.

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Table of contents

1. *Executive Summary* 3
2. *Introduction* 5
3. *Overarching key messages* 6
4. *Draft Built Environment Adaptation Action Plan 2027-31* 12
5. *Draft Natural Environment Adaptation Action Plan 2027-31* 19
6. *Draft Water Cycle Adaptation Action Plan 2027-31* 22
7. *Draft Transport Adaptation Action Plan 2027-31* 24
8. *Draft Energy Adaptation Action Plan 2027-31* 28
9. *Draft Health and Human Services Adaptation Action Plan 2027-31* 30
10. *Draft Education and Training Adaptation Action Plan 2027-31* 33

1. Executive Summary

The Municipal Association of Victoria, Victorian Greenhouse Alliances, Alliance for a Sustainable Built Environment and Association of Bayside Municipalities welcome the opportunity to provide a submission in response to the Victorian Government's draft Adaptation Action Plans 2027-2031 (AAPs).

As planning authorities, service providers, owners and managers of community assets and stewards of local environments, councils have clear responsibilities in delivering place-based adaptation across each of the draft AAPs.

The AAPs provide a clear overview of the Victorian Government's intentions to act on the adaptation priorities in the Climate Change Strategy. As noted throughout the submission, there are several opportunities to strengthen the design and implementation of the AAPs in partnership with the local government sector.

This submission is grounded in the principle that effective adaptation action requires all three levels of government to work together. It identifies opportunities across the draft AAPs to better recognise and clearly define the role of local government as a critical delivery partner for place-based adaptation. To enable timely and proactive action, the 2027-31 AAPs should be fully funded, including direct support for local government via an ongoing climate adaptation fund. Known data gaps in delivering place-based adaptation should also be addressed through support to councils.

Governance, monitoring and evaluation are critical aspects of adaptation planning. The submission notes the need to outline the governance structure for whole-of-government coordination and delivery of the AAPs. It has been difficult for the local government sector to determine whether actions in the 2022-2026 AAPs were implemented effectively. To this end, the submission recommends the development and publication of a monitoring and evaluation framework that ensures progress is publicly reported on a regular basis.

Finally, the submission notes there is scope for the 2027-31 AAPs to better articulate how cross-cutting issues, such as coastal adaptation and building resilience of vulnerable people in their homes, are being addressed.

Detailed commentary on the risks, opportunities and individual actions is provided on the draft AAPs in the main body of the submission.

The local government sector looks forward to playing a constructive role in the implementation of the 2027-31 AAPs.

Recommendations

Recommendation 1: Recognise and clearly define the role of local government as a critical delivery partner for place-based adaptation.
Recommendation 2: Fully fund actions in the each of the 2027-31 AAPs including specific support for local government to deliver place-based adaptation.
Recommendation 3: Outline the governance structure for whole-of-government coordination and delivery of AAPs.

Recommendation 4: Provide support to councils to address known data gaps in delivering place-based adaptation.
Recommendation 5: Develop and publish a monitoring and evaluation framework that guides continuous improvement of AAPs with results published on a regular basis.
Recommendation 6: More clearly outline how matters that cut across multiple plans are being addressed.

2. Introduction

The following local government alliances have agreed to partner and submit this response to Victoria's draft Adaptation Action Plans 2027-2031 (AAPs):

- Municipal Association of Victoria (MAV)
- Council Alliance for a Sustainable Built Environment (CASBE)
- Association of Bayside Municipalities (ABM)
- Barwon South West Climate Alliance (BSWCA)
- Central Victorian Greenhouse Alliance (CVGA)
- Eastern Alliance for Greenhouse Action (EAGA)
- Gippsland Alliance for Climate Action (GACA)
- Goulburn Murray Climate Alliance (GMCA)
- Northern Alliance for Greenhouse Action (NAGA)
- Western Alliance for Greenhouse Action (WAGA)

The Municipal Association Victoria (MAV) is the peak body for Victoria's 79 councils with the purpose to mobilise action that supports councils to create cities, regions, and towns that are thriving, resilient and inclusive communities. The Council Alliance for a Sustainable Built Environment (CASBE), Association of Bayside Municipalities (ABM) and the Victorian Greenhouse Alliances are formal partnerships of councils and statutory agencies driving climate change action across the state, together representing more than 60 Victorian councils.

Victorian councils are on the frontline of climate change, managing the risks and impacts of increasingly frequent and severe weather events, while driving climate change adaptation and emissions reductions for their communities and their own operations.

Local government is a key link between government and communities, supporting the rollout of state and federal policies and building confidence in climate initiatives through education, engagement and place-based programs that reflect local needs and priorities. This role is legislated through the *Local Government Act 2020*, the *Climate Change Act 2017*, the *Planning and Environment Act 1987* and other Victorian regulation. Accordingly, as leading collaborative bodies for coordinated climate action by councils, the Alliances are vitally concerned with the development and implementation of Victorian Government policy including the AAPs to improve climate resilience and adaptation for the benefit of communities, regions and Victoria as a whole.

Our submission includes overarching key messages about the development, implementation, governance and measurement of the AAPs, as well as feedback and suggestions for actions under each specific AAP.

3. Overarching key messages

The responses below are structured as answers to key questions posed in the Government's survey on Engage Victoria in relation to the AAPs.

3.1 Which of the adaptation priorities in Victoria's Climate Change Strategy 2026-30 are most important to you?

We acknowledge the importance of all 9 adaptation priorities in the Strategy:

1. Focus on the most at-risk individuals and communities and support them to reduce their vulnerability and exposed to climate impacts.
2. Provide information and advice to households and communities to manage climate risks and seize opportunities.
3. Focus on the most at-risk critical industry sectors and workforces and support them to reduce their vulnerability and exposure to climate impacts.
4. Provide information and advice to industries and businesses to manage climate risks and seize opportunities to build a climate resilient economy.
5. Focus on the most at-risk assets and services and implement risk mitigation strategies, including feasible opportunities to build back better or support managed transition.
6. Ensure planning, design, location and procurement standards for new assets and services seek to minimise climate risks.
7. Support emergency management and preparedness for more frequent and intense climate-related events.
8. Focus on climate-related risks to Victoria's natural environment and implement strategies to maximise biodiversity conversation and support ecosystem services.
9. Support nature-based solutions that connect Victorians to the natural environment, reduce emissions and build climate resilience.

As planning authorities, service providers, owners and managers of community assets and stewards of local environments, councils have clear responsibilities across all these priority areas.

3.2 How can the Victorian Government support your top adaptation priorities?

We acknowledge that the AAPs provide a clear overview of the Victorian Government's intentions to act on the adaptation priorities in the Strategy over the next five years. For the most part they refer to 'systems' that local government is a key part of, yet the actions themselves primarily reflect Victorian Government actions. Many of the draft AAPs acknowledge that they are building on the 2022-2026 AAPs, and at least some of the actions listed are also carried across into the new plans, although it is not clear if these new AAPs supersede the 2022-26 plans or should be read in combination.

The AAPs lack a coordinated structure and other important details that would provide councils, or indeed any stakeholders, with confidence that they could be successfully delivered.

We believe that the design and implementation of the AAPs could be improved in the following ways.

3.2.1 Recognise and clearly define the role of local government as a critical delivery partner for place-based adaptation

Effective adaptation action requires all three levels of government to work together through a multi-level governance approach. This approach is recognised in the National Climate Change Partnership which acknowledges the roles, responsibilities and contributions of local government in meeting climate goals and commits the Commonwealth, state and territory governments to working closely with councils to realise shared adaptation priorities.

The *Climate Change Act 2017* states the AAPs must include a statement of the roles and responsibilities of the government of Victoria and other governments, persons and bodies in relation to the relevant system. There are opportunities across the draft AAPs to better recognise and strengthen the critical role of councils in delivering place-based adaptation and building climate resilient communities.

Councils are leading and coordinating a significant amount of adaptation work which contributes to achieving the government's climate goals, particularly in land use planning, management of local roads, drainage, community facilities and open space, and delivery of emergency management, public health and other community services.

To support the recognition of local government contributions to adaptation, the Government should also consider the development of a climate reporting framework for councils to improve consistency, reduce duplication and support measurement.

Further comments will be made under each of the relevant AAPs.

Recommendation 1: Recognise and clearly define the role of local government as a critical delivery partner for place-based adaptation.

3.2.2 Address the funding gap by fully funding the actions outlined in each adaptation action plan, including support for local government

Victoria's progress towards meeting its adaptation goals is being hampered by a lack of sufficient funding. Many of the existing funding arrangements for adaptation are ad-hoc, short-term and project-based. Underfunding adaptation ultimately increases future costs, exposes communities to greater risks and delays progress towards shared resilience objectives. The 2027-31 AAPs must be fully funded to enable timely and proactive action. The introduction of a transparent funding framework that identifies and tracks budget allocations for climate resilience and adaptation initiatives, as recommended by the Inquiry into climate resilience, would support this goal.

Councils are on the frontline of climate adaptation, responsible for protecting communities, assets and services from escalating climate risks. We recognise that significant adaptation progress requires long term, flexible funding options alongside a regional approach to prioritising projects. Direct investment by other levels of government is required to enable councils to effectively contribute to the State's adaptation agenda. To this end, the sector is calling on the Victorian Government to partner with councils to establish a dedicated, ongoing climate adaptation fund for local government.

Recommendation 2: Fully fund actions in the each of the 2027-31 AAPs including specific support for local government to deliver place-based adaptation.

3.2.3 Ensure governance structures are in place to support the Government to deliver the AAPs successfully

Effective governance is essential to achieving climate resilience through the AAPs. As the authors of the Governance Technical Report for the National Climate Risk Assessment state, governance is a source of risk but is also at risk itself through climate change. It is not simply a description of the authorising environment for action of only secondary importance to action itself. Specifically, 'Five key governance elements – resourcing, roles and responsibilities, engagement and participation, climate risk management and collaboration and coordination – are particularly strong risks to governance in Australia.'[1]

In the context of the AAPs, these elements can be addressed through:

- Adequate resourcing and funding to implement all actions in the AAPs, otherwise how can they be achieved? (See the point above for further details.)
- Clear identification and delineation of the roles of delivery agents for each action, so that everyone knows what their responsibilities are and has authority to develop a clear implementation plan
- Clarity on how references to overarching 'systems' (e.g. Transport and Health and Human Services) will apply and support local government as key system partners
- Demonstration of how key stakeholders, including councils, will be engaged and given opportunities to participate in the actions
- Explicit commitment to climate risk management, i.e. through climate change risk assessment, adaptation planning and implementation, and monitoring, evaluation and reporting against the stated actions
- Demonstration of how the various state departments and agencies leading the AAPs will collaborate and coordinate their work between themselves and with key stakeholders.

Currently, each AAP has a lead department but doesn't identify which department, unit or agency is responsible for individual actions, and some plans cover multiple portfolios and agencies. The governance structure to implement each AAP, and any coordination across the AAPs, are also not visible. While the governance structure does not need to be included in the AAPs themselves, we would like to understand the structure and suggest that it could be included in an overarching document to accompany the AAPs. This would provide confidence that there is real accountability to achieve the objectives of the AAPs, which are the 9 stated adaptation priorities set out in the Climate Change Strategy.

Recommendation 3: Outline the governance structure for whole-of-government coordination and delivery of AAPs.

3.2.4 Address data gaps to support implementation

Victoria's Future Climate tool is a useful source of climate data for regional assessments. However, access to current and consistent local-scale data is also

[1] Richards, Lauren et al, Governance Technical Report, National Climate Risk Assessment, p.1

critical for local government to deliver on its climate change responsibilities, including municipal-level climate change risk assessments. Most councils lack the resources and capacity to generate and apply such data. There are also inefficiencies in multiple councils outsourcing data projects to external providers.

Councils need:

- Consistent climate projections
- Hazard mapping
- Vulnerability data
- Asset risk tools
- Training in using the data and tools.

Recommendation 4: Provide support to councils to address known data gaps in delivering place-based adaptation.

3.2.5 Embed monitoring, evaluation and reporting on action plans to support transparency and accountability

Monitoring, evaluation and reporting (MER) is an essential element of the governance of the AAPs. The *Climate Change Act 2017* commits the Victorian Government to reporting on the implementation and effectiveness of the AAPs. However robust implementation reporting was not available at the time of this consultation. The framework being used to measure implementation and effectiveness has also not been released. This makes it difficult for the local government sector to determine whether actions in the 2022-2026 AAPs were implemented effectively and whether carry-over actions in the draft 2027-31 AAPs are appropriate.

The local government sector holds concerns regarding the transparency of the process in which AAPs are drafted and reviewed.

We understand implementation of the AAPs is being reported on via inquiries from parliament's Public Accounts and Estimates Committee (PAEC), with no details or public promotion about what has actually been done or achieved. This cannot be a substitute for real public accountability. The inclusion of the AAPs in the PAEC Questionnaire is not an accessible nor comprehensive form of public reporting. It is noted that the DEECA 2024-25 Questionnaire contains information on four of the AAPs relevant to DEECA with very variable levels of information.

As noted in Infrastructure Victoria's Weathering the Storm report "best practice adaptation requires reporting and assessment mechanisms to determine whether adaptation is progressing and is effective in building resilience". The Inquiry into climate resilience also recommended the Victorian Government provide regular, consolidated and publicly accessible updates on progress for all AAPs.

It is imperative the Victorian Government develops and publishes a monitoring and evaluation framework that guides continuous improvement of adaptation plans. This includes measurement of individual actions in each AAP, as well as whole-of-system statewide adaptation progress. The results of monitoring and evaluation should be published regularly to promote transparency, accountability and public confidence.

Recommendation 5: Develop and publish a monitoring and evaluation framework that guides continuous improvement of AAPs with results published on a regular basis.

3.2.6 Importance of recognising cross-cutting issues

There are several matters that cut across multiple AAPs, for example improving the resilience of vulnerable people in their homes. This aligns closely with the Built Environment, Energy and Health and Human Services plans, yet the interconnections are not well articulated. This risks critical cohorts and risks falling through the cracks. It would be beneficial if the AAPs more clearly spelt out these matters and highlighted how they are being addressed.

The management of the marine and coastal environment is another complex and cross-disciplinary issue for climate adaptation. Modern coastal adaptation practices expand from traditional infrastructure, offering engineering, nature-based and land use solutions to adapt to the impacts of climate change. Coastal adaptation cuts across several of the AAPs and does not fit neatly into any one system. The AAPs do not adequately support the challenges posed by climate change to our coastal and marine environment. The local government sector is seeking a more robust and coordinated approach to coastal adaptation. This could take the form of a coordinated state-local government coastal hazards adaptation strategy, supported by dedicated ongoing funding for councils.

The AAPs also give limited consideration to the rapid growth of data centres and the challenges they present for land use planning, infrastructure systems, water and energy usage. The Built Environment, Water Cycle and Energy AAPs could more explicitly recognise the challenges presented by data centres including the cumulative impacts on resource security, infrastructure resilience and long-term urban development outcomes.

Recommendation 6: More clearly outline how matters that cut across multiple plans are being addressed.

3.2.7 General recommendation and proposal

As detailed above, the following elements are critical to the successfully delivery of the AAPs:

- Transparent and robust governance
- A clear monitoring and evaluation framework
- Regular public reporting with sufficient detail to understand whether and how actions are being achieved and demonstrate accountability.

To facilitate this, we recommend a general review of the way the AAPs are designed and implemented, including whether and how, standard climate risk management processes have been employed to address adaptation at a whole-of-government level and at the level of each ‘system’ through the AAPs. Standard practice includes climate change risk assessment and adaptation planning based on the assessment and prioritisation of risks. The Australian Government’s Climate Risk and Opportunity Management Program (CROMP), mandatory for federal government agencies, provides a useful model, guidance and assistance for state-based agencies as well. Currently, the CROMP program is being promoted to Victorian councils through the Victorian Climate Resilient Councils (VCRC) program as part of a structured process for councils to embed adaptation into all their operations, services and asset management.

If all three levels of government were to use the same standards and methodologies for climate risk management and adaptation, the collaboration and shared learning could facilitate best-practice across governments, provide for more efficient use of

resources and funding and, most importantly, ensure adaptation meets the needs of all key stakeholders.

Accordingly, we propose a co-designed project to review the development of the AAPs and establish effective adaptation governance for both the state agencies leading the AAPs and Victorian councils. The project could include practitioner training and the establishment of communities of practice and/or other relevant mechanisms to share information and raise capacity. The project could also leverage expertise and processes already established by the federal government (CROMP) and the Victorian Climate Resilient Councils program. This proposal is in addition to other specific project proposals outlined under each AAP in this submission.

We would be happy to develop any of our proposals with DEECA and/or the relevant lead agencies.

4. Draft Built Environment Adaptation Action Plan 2027-31

4.1 Which climate risks do you consider most important for the government to act on?

Victoria's built environment is vulnerable to cascading effects of unmitigated climate change. The recent summer fires came after flooding in 2022 and 2023, as well as the fires of 2019 and 2020. Our submission has identified the following as the most important:

- Increasing exposure of homes, buildings and communities to extreme heat, including urban heat island effects, overheating of dwellings and associated public health impacts.
- The long-term impacts of flooding, bushfire, coastal hazards and sea level rise on settlement patterns, infrastructure investment and development decisions.
- Growing risks to housing affordability, liveability and health arising from buildings and neighbourhoods that are not designed to perform under future climate conditions.
- Loss of urban greening and tree canopy, reducing urban cooling benefits and limiting the effectiveness of nature-based adaptation measures.
- Increasing pressure on water resources, including drought, water scarcity and long-term water security challenges associated with climate change and population growth.
- Increasing pressure on energy, water and infrastructure systems from both climate change and urban growth, including the cumulative impacts of emerging high-resource-demand development such as data centres.

4.2 Which opportunities do you consider most important for the government to act on?

As this submission explains, we are deeply concerned the Victorian Government has under-delivered and over-sold its implementation of the Built Environment Adaptation Action Plan 2022-26. We urge the government to recommit to:

- Embed climate resilience into planning, infrastructure and development decisions at the earliest stages of planning and project delivery.
- Delivering climate-resilient homes, buildings and neighbourhoods that remain safe, healthy, affordable and comfortable under future climate conditions, including through measures that reduce urban heat and overheating risks.
- Leveraging government-led development and urban renewal projects to demonstrate leading-practice climate adaptation outcomes and accelerate broader industry uptake.
- Undertake monitoring and evaluation of climate resilience outcomes to ensure planning reforms and adaptation measures are delivering measurable outcomes in practice.
- Partnering with Traditional Owners to embed Planning with Country principles, Caring for Country, and Traditional Owner leadership in built environment adaptation planning and implementation.
- Improving the monitoring and evaluation of climate resilience outcomes to ensure planning reforms and adaptation measures are delivering measurable outcomes in practice.

4.3 Which actions do you consider most important for building resilience of the system of interest?

We are deeply concerned that there is just one action, Action 1, directly related to the built environment. Action 1 is the only action for building resilience within the built environment system; it can therefore be the only one that is important. It is the only action related to how the Victorian government, and its partners such as councils, can focus on influencing long-term land use and settlement planning and development outcomes to adapt to climate change.

We strongly support its focus on embedding climate risk into built environment decision-making. We agree that climate action and adaptation can be improved through improved climate risk datasets, hazard modelling and planning tools, urban cooling and greening initiatives, and climate-informed land use and settlement planning. MAV, CASBE and the VGAs have consistently called for strong state and national leadership in all these areas for a long time.

To maximise its effectiveness, Action 1 must provide greater detail on how climate risk information will be translated into planning and development outcomes. Alternatively, the Action must be split into entirely new and focussed actions to ensure the built environment leads within Government responsible for implementation, have a clear mandate for action.

In either case, actions under the Built Environment Adaptation Action Plan must include stronger planning, subdivision and building standards, and a climate risk assessment process that supports resilient development outcomes.

4.4 Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

4.4.1 Learnings from the Previous Built Environment Adaptation Action Plan

The original Built Environment Adaptation Action Plan 2022-26 contained 19 actions. We supported these actions at the time, and welcomed their ambition. However, implementation reporting was not included as part of the consultation materials for the draft Plan and had to be obtained separately. Future consultations should publish implementation reporting alongside draft plans to support informed stakeholder feedback, and demonstrate how the government has measured its success and informed development of the next adaptation actions.

Of the 19 actions in the 2022–26 Plan, publicly available reporting provides substantive updates on only two actions: Action 4 (housing resilience initiatives) and Action 5 (energy resilience initiatives). Limited information is available on progress against several planning-related actions (Actions 1, 3, 8, 9, 10 and 19), including planning provisions, building standards, hazard mapping, planning scheme updates and legal mechanisms to support climate-resilient urban development.

MAV and CASBE have called for transparent reporting and review of Victoria's most recent planning reforms against environmental, climate and design outcomes. While the government has given an undertaking the various reviews are underway, it is not clear how this review is being undertaken, nor its scope.

This makes it difficult to assess what outcomes were achieved and how lessons from the previous Plan have informed the draft Plan. Several planning-related actions from

the 2022-26 Plan appear to have been consolidated into Action 1 of the draft Plan. While reducing 19 actions to four broad actions appears to streamline the Plan, tracking progress against specific and important outcomes will become more difficult, and reinforces the need for clear monitoring, evaluation and reporting.

4.4.2 Planning and Development as a Core Adaptation Response

Action 1 is the only proposed action that directly influences long-term built environment outcomes through planning and development decisions. While the emergency management and recovery initiatives in Actions 2 and 3, and the advocacy focus of Action 4, are important components of Victoria's broader adaptation response, Action 1 is the primary mechanism for reducing future climate risk through the planning and development system.

The government may state that through elevating climate outcomes in the objectives of the *Planning & Environment Act,* implementing the ESD Roadmap, and codification of residential planning standards as demonstrating their action, many view these as not going far enough, or worse in some cases, a step back.

Given planning decisions shape resilience outcomes for decades, preventative adaptation through the planning system must be a core focus of the Built Environment AAP. The recommendations below focus on strengthening Action 1 and identifying additional actions to address gaps in the Built Environment AAP.

Proposed action: Elevate the importance of Actions 1 & 4 by removing the emergency management and recovery initiatives (Actions 2 and 3) from the Built Environment Adaptation Action Plan as their own, stand-alone priorities or to integrate them across all systems.

4.4.3 Strengthening Existing Actions

Strengthening Planning Mechanisms to Deliver Adaptation Outcomes

Recent planning reforms have largely removed councils' ability to apply locally developed ESD policies and climate resilience requirements to residential development. As discussed in Section 4.4.1, there is currently limited evidence that recent planning reforms are delivering equivalent or improved climate resilience outcomes in the built environment system. Victorian councils have invested significantly in policy development, technical evidence, assessment tools and implementation experience to create a strong foundation that should be leveraged and expanded as part of Victoria’s adaptation response.

Proposed strengthened action: Strengthen Action 1 by reviewing the new housing codes in the Victorian planning scheme and reinstating the robust resilience design measures that were removed during the recent reviews of Clauses 55 and 57, including the exclusion of local ESD policies from planning assessment and decision-making.

Case Study – Building Resilience to Extreme Heat
One council reported that applicants are deliberately avoiding north-facing windows to avoid shading requirements under the revised Clause 55 standards (Townhouse and Low-Rise Code). This has been enabled by the removal of the north-facing living area requirement and weaker shading provisions. While compliant with current standards, these outcomes may reduce passive thermal performance, increase reliance on mechanical cooling and result in homes that are less resilient during future heatwaves and energy disruptions. This outcome appears inconsistent with the AAP's objective of increasing resilience to extreme heat.

Government Leadership and Demonstration Projects

While the draft Plan focuses on influencing broader planning and development outcomes, it contains limited actions that apply directly to Victorian Government-led projects.

The ACT Suburban Land Agency provides a strong precedent for government leadership, using demonstration projects to showcase climate-resilient development and build industry capability. Victoria's own Development Victoria should be doing the same to demonstrate this state's ability to lead in built environment adaptation.

Proposed strengthened action: Strengthen Action 1 by including a commitment for government development agencies, such as Development Victoria, to deliver demonstration projects that showcase and test leading-practice climate-resilient design and development.

4.4.4 New Actions

Traditional Owner Leadership and Self-Determination

The Built Environment AAP does not include a dedicated self-determination action, unlike several other Adaptation Action Plans. Given the role of planning and development in shaping Country and community outcomes, there is an opportunity to strengthen the Plan by embedding Planning with Country principles and more explicitly recognising Traditional Owner leadership, knowledge and decision-making in adaptation planning and implementation.

Proposed new action: Support Planning with Country principles and Traditional Owner partnerships in built environment adaptation, recognising the role of Caring for Country in strengthening climate resilience and supporting Aboriginal self-determination.

Monitoring Whether Adaptation Outcomes Are Being Delivered

Recent parliamentary inquiries have called on the government to better evaluate the impact of planning reform on climate resilience outcomes in practice. The government's current approach is assuming climate outcomes will be delivered as intended by regulatory reform.

Evidence presented to the Select Committee Inquiry into Amendments VC257, VC267 and VC274 found that local ESD policies operating across 28 municipalities (representing approximately 71% of Victoria's population and therefore most of the development activity) were switched off through recent residential planning reforms. Inquiry finding 16 concluded that sustainability outcomes were reduced in municipalities previously covered by local ESD policies, and it had not been demonstrated that the new approach represented an overall improvement to Victoria's climate resilience.

The planning reform program has eroded the number of developments assessed through the Built Environment Sustainability Scorecard (BESS). This has created a significant evidence gap that limits the ability of government, councils and industry to monitor and evaluate climate resilience and sustainability outcomes across Victoria's development pipeline. CASBE has sought to provide the government with this data to influence better regulatory design. It is not clear if the government has incorporated this evidence into its planning reforms. The Inquiry into Climate Resilience similarly identified a need for ongoing review and monitoring of residential planning reforms.

Given the AAP identifies reforms such as the Townhouse and Low-Rise Code and Mid-Rise Code as key adaptation measures, it is important that resilience outcomes are measured and demonstrated, rather than assumed to have been achieved. Based on the evidence presented by MAV and CASBE to several inquiries and in our submissions, we are not convinced that these key adaptation measures were achieved in the previous adaptation plan. They must be continued into the current plan under consideration.

Proposed new action: Establish a statewide monitoring and public reporting framework for climate resilience, sustainability and liveability outcomes delivered through the planning system, including proper evaluation of reforms such as the Townhouse and Low-Rise Code and Mid-Rise Code.

Case Study – Place-Based Climate Adaptation
A climate vulnerability assessment for an established inner-urban Melbourne precinct identified significant flood and heat risks, compounded by constrained drainage infrastructure, limited canopy opportunities and a highly built-up urban environment.
The assessment found that effective adaptation required locally tailored responses, including increased site permeability, stormwater capture, flood risk avoidance and improved building thermal performance. Modelling demonstrated that integrated heat and flood adaptation measures outperformed standardised design responses under future climate conditions.

This demonstrates the value of place-based adaptation and suggests that standardised planning approaches may not always respond effectively to local climate risks and constraints.

Urban Heat Resilience

Urban heat is one of the most significant climate risks facing Victoria's built environment and warrants greater prominence in the final Plan. While recognised as a key hazard, the proposed actions primarily address it indirectly through urban greening and emergency management initiatives.

The United Nations Global Chief Heat Officer has identified urban heat as a major public health challenge, highlighting passive cooling, shading and climate-responsive design as critical adaptation measures.

Proposed new action: Introduce a dedicated urban heat resilience action focused on passive cooling, climate-responsive building design, urban greening and tree canopy to reduce overheating risks and improve community resilience.

Case Study – Tree Canopy and Urban Cooling

The AAP identifies tree canopy and urban greening as key adaptation measures. However, modelling undertaken for the City of Stonnington found that residential canopy cover is projected to decline from 19% to 14.3% under current planning settings despite recent reforms in response to Victorian Government's 30% canopy target.

Recent reforms standardise development outcomes and reduce opportunities for councils to apply locally tailored provisions to respond to local area specific canopy challenges. The modelling found that these reforms do not prevent canopy loss on private land, which makes up most land in Stonnington, and is where most existing canopy is located. Tree planting in the public realm (streets and open spaces) cannot be sufficient to counter this loss and achieve the canopy target.

This demonstrates a disconnect between the adaptation outcomes sought by the AAP and the planning controls relied upon to deliver them, current settings cannot achieve the urban cooling and resilience benefits anticipated.

Circular economy, resource efficiency, nature-based solutions

Where possible, use the Actions to encourage circular economy and resource-efficient approaches in the planning, design and construction of buildings and infrastructure to improve long-term resilience and sustainability outcomes. Also consider expanding the role of nature-based solutions to improve climate resilience and deliver liveability benefits.

Case Study – Flood and Water Resilience

Codified planning pathways are limiting councils' ability to apply local ESD policies, reducing the use of rainwater tanks and other Water Sensitive Urban Design measures in new development. In established bayside municipalities, drainage systems are already constrained, with one council reporting "dry flooding" during king tides. Without distributed stormwater measures such as smart rainwater tanks, increasing urban intensification, sea level rise and changing rainfall patterns are likely to increase flood risk, place additional pressure on ageing infrastructure and shift costs to local government. This undermines the flood and water resilience outcomes sought by the AAP.

Image 1 & 2 Caption: Melbourne bayside municipality recent 'dry flood' event

5. Draft Natural Environment Adaptation Action Plan 2027-31

5.1 Which climate risks do you consider most important for the government to act on?

Overall, the scale of the problem and the potential impacts, as identified in the National Climate Risk Assessment, are not reflected in the limited actions of this AAP. The actions are mostly about applying the climate adaptation lens to existing initiatives and supporting guidance/improving existing outcomes. The risk assessment also has a human-centric focus and there is a risk of overlooking the true risks of climate change to natural ecosystems.

A changing climate disrupts the function of natural environments, impacting survival and breeding of individual species, through to the interactions, structure and functioning of ecosystems. Reduced rainfall, more intense storms, rising sea temperatures and changing sea levels are disruptions to a system that is already degraded and facing significant external threats.

Threats like fragmentation, development and invasive species compound the impacts of climate change. While the Government cannot prevent a changing climate, it can significantly manage other threats to biodiversity and do works to restore natural ecosystems and species. These works will increase the resilience of our natural environment to a changing climate, providing a greater chance that species and ecosystems persist and continue to support human populations.

5.2 Which opportunities do you consider most important for the government to act on?

5.2.1 Building ecosystem resilience

Local governments manage natural reserves and foreshores, deliver threatened species recovery programs and working with many environmental community groups. This work requires significant support from the Victorian Government in the form of knowledge sharing and funding support. Some key areas of focus include:

- **Waterways and wetlands** provide important space for species to retreat with a drying climate. Managing healthy waterways and wetlands also help maintain clean water and mitigate flooding impacts.
- **Foreshore reserves** support natural habitats and a space for community recreation. But they also provide an important buffer to protect communities and infrastructure against rising sea levels and more intense and frequent storms.
- **Threatened species and ecosystems** require particular and immediate attention to prevent them being lost. This includes marine ecosystems which may be less visible but are no less vulnerable.
- **Community reserves** which provide spaces where communities can learn about the natural environment and connect with nature.

5.2.2 Supporting urban greening

In a changing climate, heatwaves and the urban heat effect pose a significant risk to our health and wellbeing. Particularly to the most vulnerable – older people, children and people with existing medical conditions. People experiencing socioeconomic disadvantage may also have less access to cool spaces.

Our urban forest and green spaces improve air quality, reduce the impacts of heat and heatwaves, increase biodiversity and provide enjoyment and wellbeing for residents and visitors.

5.3 Which actions do you consider most important for building resilience of the system of interest?

All the actions are important for building the resilience of natural systems. We applaud the engagement with Traditional Owners and ensuring the use of traditional knowledge. However, the absence of an action focused solely on on-ground works is a significant concern. Without on-ground works to improve the resilience of natural ecosystems, the work of planning and gathering and sharing knowledge has limited impact.

5.4 Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

The AAP could also be strengthened to recognise urban nature as adaptation infrastructure. The role of tree canopy, urban greening, wetlands and green corridors as measures for heat reduction, stormwater management, biodiversity and community wellbeing should be elevated as it is not just environmental outcomes this AAP should seek to address.

The 2022 VAGO report on 'Offsetting Native Vegetation Loss on Private Land' found Victoria is not achieving its objective of not net biodiversity loss from native vegetation clearing on private land. It made recommendations around improvements to reporting on no-net-loss objective. Unauthorised clearing is continuing to occur and councils are struggling with capacity to regulate and stop rising unauthorised land clearing. Noting the State's mandate, there is a clear opportunity here to work together with local government on the issue, and this should be clearly stated as a collaborative action in the AAP.

There is also an opportunity for an action to review current state forest and fire management practices, including planned burning. The review should consider the latest scientific evidence and evaluate the effectiveness, benefits, trade-offs and impacts of these practices on biodiversity, ecosystem health and ecological resilience. This action could also strengthen partnerships with Traditional Owners in the planning and delivery of burns. This approach would support the incorporation of Traditional Owner cultural knowledge and management practices, including cultural burning were appropriate. Several councils have already established partnership models for planned burning of public land. The Primary Industries AAP mentions cultural burning, but it is best-placed within this AAP.

There is also an opportunity to explore nature-based solutions, including alternative finance mechanisms for funding. As with the Primary Production AAP, this could include working with councils and CMAs on local carbon market frameworks and mechanisms.

We suggest an additional action is included to support delivery of on-ground works: "Work with (or collaborate with) biodiversity professionals, land managers, traditional owners and community organisations to support on-ground works to improve the resilience of natural systems to adapt to climate change."

Overall, the roles and responsibilities section should be expanded on for key partners including councils, Traditional Owners and environmental non-government organisations.

Action 1: Improve guidance and ensure availability of resources to build adaptation knowledge and capacity of managers across the natural environment system

This action could be strengthened by clarifying whether the climate adaptation lens will be extended to local government and outlining the training and education available for users to apply the guidance.

Action 1 and Action 2

Action 1 and Action 2 are very similar and are part of the same journey of knowledge generation and knowledge sharing. Both are very important and could potentially be combined. Local government holds important knowledge that can be shared to build a better understanding.

Councils have a particular connection to their local communities and can enable the flow of information between government and community. The knowledge and tools developed by the State are vital for helping local governments to make good decisions. The Victorian Government also provides an important conduit of information between research and on-ground works.

Action 4: Strengthen sharing and knowledge networks to improve adaptation practice

This action could be strengthened by acknowledging councils as key partner agencies in sharing and knowledge networks to improve adaptation practice.

6. Draft Water Cycle Adaptation Action Plan 2027-31

6.1 Which climate risks do you consider most important for the government to act on?

All risks listed in this AAP are important.

One area of risk that needs greater focus is the maintenance, rectification and upgrading of existing water assets, as the damages to these assets, and therefore costs to adapt them, are set to rise exponentially. The Victorian Greenhouse Alliances' study of damages to community assets in Greater Melbourne illustrates this point: the research shows that, in a business-as-usual or 'do nothing differently' approach, damages to assets, including drainage, natural assets and built assets in open space, are predicted to rise by more than 100% between the present day and the nearer future (~2050) and about 350% in the more distant future (~2100). Significantly, a steeper increase in damages to drainage is predicted: more than 180% in the nearer future and 500% in the more distant future.[2] It should also be recognised that data centre development represents a significant threat to water demand in Victoria.

Two areas of interconnected risk not listed are inland flooding and coastal flooding and erosion. Rising sea levels and storms of increasing intensity, combined with lower ground infiltration during drought, can lead to flooding of coastal and low-lying areas, erosion of coastal areas and saline contamination of groundwater systems. This poses significant risk to human safety, infrastructure, agriculture and natural systems.

6.2 Which opportunities do you consider most important for the government to act on?

The opportunities listed in the AAP are worthwhile. In order to realise them, we recommend the following general actions:

- Strengthening governance between state agencies, CMAs, water corporations and councils, building on existing projects and data developed by these key stakeholders
- Clarifying responsibilities for local drainage, flood risk and stormwater
- Increased support for integrated water management and catchment-scale planning
- Specific project/s to improve maintenance and upgrading of existing assets, particularly drainage.

6.3 Which actions do you consider most important for building resilience of the system of interest?

All the actions listed in the AAP are worthwhile as strategic directions to improve adaptation of the water cycle, provided the specific projects to achieve them are planned, undertaken and measured.

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[2] [3] Natural Capital Economics, 22 March 2023, *Adaptive Community Assets: A report prepared for the Eastern Alliance for Greenhouse Action,* p10, Adaptive-community-assets_Final-report-1.pdf

6.4 Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

A key project, which could be considered under Action 1, would be to (a) identify and map existing drainage assets across Victoria, improving the data related to these assets; and (b) identify, prioritise and cost adaptation options to upgrade them. While this would be a major project, it could be undertaken as a multi-level partnership project and build on a number of current projects by local government which include or even focus on understanding and improving adaptation of drainage assets, including:

- Resilient Asset Management Investment by the M9 councils will uplift capability and maturity across councils by developing a shared toolkit, agreed M9 policy positions and consistent approaches to integrating climate risk into asset management and investment decision-making.
- Financing Flood Resilient Infrastructure by the South East Councils Climate Change Alliance (SECCCA), which is developing adaptation frameworks (data, adaptation options, costs and finance options) for specific council sites
- City of Melbourne's ongoing detailed work to improve flood management in the Elizabeth Street precinct through its Integrated Water Cycle Management Plan.

The role of local government in managing coastal adaptation should be reflected throughout the AAP.

7. Draft Transport Adaptation Action Plan 2027-31

7.1 Which climate risks do you consider most important for the government to act on?

All risks outlined in the Transport AAP are valid. Those with most importance to local government as a critical agent within the transport system are:

- Service disruptions, asset failure and costly repairs increase due to damage to road and rail infrastructure caused by more frequent and severe extreme weather events (especially flooding during intense rainfall events)
- Communities are isolated and emergency response capabilities compromised due to damage and disruptions to transport access and evacuation routes caused by increasing extreme weather events.
- Low-lying coastal transport infrastructure are subjected to degradation and long-term service viability risks due to erosion, saltwater intrusion and coastal change caused by gradual sea level rise and storm surges.
- Passengers, pedestrians, cyclists and transport workers' health, safety and comfort and workforce capacity are reduced due to extreme weather events and urban heat island effects.
- Damage to bridges increase as drainage systems are overwhelmed by extreme rainfall events and flooding.
- Maintenance costs, insurance exposure and operational complexity for transport agencies and operators rise due to damage to transport assets caused by increasing extreme weather events and changing climate.

Consider including an additional risk of a lack of understanding of current conditions of the transport asset base and associated risk assessments.

Risk 4 frames coastal transport risk as chronic degradation ("erosion, saltwater intrusion and coastal change") even though its stated causes include acute storm surge events. This conflates gradual, long-term change with sudden, event-driven damage to general coastal transport infrastructure, which sits outside Risk 9's port-specific framing. For example, in June 2026 storm surge combined with heavy rain caused overnight flooding along the Altona Foreshore in Hobsons Bay, requiring roads to be closed by council on call crews with support from Victoria Police. Footpaths and roads were left covered in wet sand and debris, with damage to sections of foreshore infrastructure requiring assessment and repair. We recommend an acute storm/surge damage risk to general coastal transport infrastructure, distinct from both gradual coastal degradation and port-specific disruption, be added or clearly disaggregated.

7.2 Which opportunities do you consider most important for the government to act on?

All three opportunities are a high priority for government to act on.

- System resilience and reliability: Adaptation investments improve network reliability and reduce long-term disruption costs. Asset modernisation and innovation: Climate pressures accelerate infrastructure upgrades and adoption of advanced technologies. For many assets, improved maintenance regimes are more critical before upgrades can be considered. Upgrades should reflect betterment.

- Improved planning and decision-making: Climate data supports better long-term planning and asset prioritisation decisions.

A fourth opportunity should be added: preventative demand management and behaviour change. The current opportunities are entirely supply-side (investment, technology, data). Reducing exposure by shifting travel behaviour during extreme events, and encouraging mode shift to more climate-resilient active and public transport, is a distinct and low-cost adaptation lever that is missing.

7.3 Which actions do you consider most important for building resilience of the system of interest?

The *Transport Integration Act 2020* and *Climate Action Act 2017* define the transport system as "all the components which make up the system for the movement of persons and goods". Local government is the manager of 133,000 kms of local roads (87% of total network). The language of the AAP is about actions the Victorian Government is taking to improve the resilience of Victoria's transport system (e.g. roadside assessment modelling). It would be useful if the AAP could more clearly articulate the application of these actions to local government.

We note that all three Actions in the Plan are led solely by the Department of Transport and Planning, with no formal co-delivery or shared leadership role for local government. This is inconsistent with the AAPs' own acknowledgement that local government constructs and maintains local infrastructure and delivers community-level adaptation measures (Figure 4), and with the fact that councils are responsible for most of Victoria's road network. We recommend that a local government delivery role be explicitly built into each Action, rather than local government's contribution being addressed only in general roles-and responsibilities language.

The AAP is silent on active transport. Active transport performs a critical connection between mitigation and adaptation. As noted in *Victoria's Active Transport Plan 2026,* active transport fosters social connection, support local economies, and make our suburbs and cities more liveable. The plan acknowledges local government's central role in delivering active transport, managing the footpaths, local roads, and cycling paths that connect communities.

The Active Transport Plan recognises that "climate resilient active transport routes are designed to help mitigate the impacts of climate change, including extreme weather events such as storms, heat, flooding and wind. Climate-adapted infrastructure will be essential for ensuring active transport remains a viable option, even in challenging weather" (page 48).

The Transport AAP should explicitly draw linkages and references to key actions across both this AAP and Victoria's Active Transport Plan.

7.4 Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

More broadly, the AAP's framing of transport risks is predominantly reactive: it describes how a changing climate will damage infrastructure and disrupt services, rather than how the transport system can proactively reduce the severity of those impacts before they occur. Mitigation and adaptation are closely linked, and reducing heat loads on transport infrastructure and users is itself a form of adaptation, not solely a downstream emissions concern. The term "mitigation" appears only once in

the AAP's glossary and is barely reflected in the body of the Plan. We recommend the AAP more clearly frame adaptation as encompassing both reactive response to hazards and proactive, preventative measures that reduce the severity of those hazards in the first place.

As an example of a proactive, trigger-based intervention, some jurisdictions use pre-emptive cooling measures, such as watering road surfaces and steel bridge structures ahead of and during forecast extreme heat, to reduce thermal expansion and pavement degradation before damage occurs. We recommend the AAP consider whether similar trigger-point response protocols, defined temperature or heat-index thresholds that activate a pre-planned set of preventative actions, could be incorporated into asset management and emergency preparedness actions (Actions 2 and 3), rather than relying solely on post-event repair and recovery.

This proactive framing also extends to the interface between transport corridors and the built environment. The Built Environment AAP places welcome emphasis on tree canopy and urban greening as a heat mitigation measure, yet the Transport AAP does not draw the connection between street tree canopy and shade coverage along roads, footpaths and active transport routes, and the urban heat island effect on transport users identified as a risk above. Shade over footpaths, cycling paths, bus stops and tram stops directly affects the comfort, safety and viability of active and public transport as low-carbon travel choices, particularly during heatwaves. We recommend the Transport AAP explicitly cross-reference the Built Environment AAP's tree canopy and urban greening actions, and consider a specific initiative addressing shade provision along key transport corridors and at public transport waiting areas.

Action 1: Integrate climate-adaptive principles into planning and design of transport infrastructure to enhance the long-term resilience of Victoria's transport network.

Local government is responsible for the majority of Victoria's road network. This action includes a number of initiatives such as:

- applying climate-informed design standards and resilience considerations into transport projects. I
- climate risk assessments at the planning and project approvals stage,
- investing in upgrades and maintenance that address identified network vulnerabilities
- trialling place-based measures, such as green infrastructure, where they improve asset performance and resilience
- enable design guidance and climate data to inform decisions early.

It is not clear how these initiatives will apply to local government. It will be important that any tools developed have applicability to increase the capacity of local government.

The Built Environment Sustainability Scorecard (BESS) already provides a proven mechanism for embedding proactive, climate-adaptive transport outcomes at the development assessment stage, through its Transport category credits for EV charging readiness, secure bicycle parking and end-of-trip facilities, and proximity to active and public transport. We recommend Action 1 explicitly reference BESS (or an equivalent statewide tool) as a lever for requiring climate-resilient transport infrastructure provision in new developments, rather than treating adaptation and development assessment as separate processes.

Action 2: Embed climate risk management into procurement, delivery and asset management to minimise exposure to heat, flooding and other extreme weather events.

Like Action 1, this action includes several initiatives that have applicability to local government such as “assess and manage climate risks and how targeted monitoring, maintenance and infrastructure renewal can help address system vulnerabilities”. One of the critical challenges for local government is the ability to effectively monitor, assess and maintain their transport assets. Any actions the State is undertaking in this regard would be of significant value to local government also.

Action 2 should also explicitly address the resilience of EV charging infrastructure, including exposure to heat (battery/charger performance) and flooding, given the State’s broader electrification agenda.

The AAP should include a project under Action 2 that provides a current state assessment of the local road network, using technologies regularly deployed by VicRoads for the arterial road network.

Action 3: Strengthen transport system readiness and response to climate events to improve safety, service continuity and recovery for Victorian communities.

This action should include initiatives that seek to improve capacity of transport operators in the restoration of assets post damage by events and providing capacity uplift (funding) for asset owners. In addition, this action should refer to building the resilience of the transport system through measures such as betterment. The Wye River Case Study illustrates this point and should be reinforced with specific initiatives.

Local government is reliant on the Disaster Recovery Funding Arrangements to enable investment in relief and recovery post disaster.

Recommendation: The AAP should call out that as part of the national review of Disaster Recovery Funding Arrangements currently underway, that Victoria will advocate for betterment strongly in favour of the proposed Resilient Infrastructure Scheme treatment of resilience building of assets. The State should also consider how this can be built into the Victorian Guidelines.

8. Draft Energy Adaptation Action Plan 2027-31

8.1 Which climate risks do you consider most important for the government to act on?

The local government sector welcomes the first stand-alone Energy Adaptation Action Plan. The AAP should consider recognising the emerging risk of increasing competition for electricity during extreme heat, particularly as energy-intensive industries such as data centres expand. This may place additional pressure on local electricity networks and affect energy reliability and resilience for households, businesses and critical community services.

8.2 Which opportunities do you consider most important for the government to act on?

The AAP is quite household- and system-focused but gives relatively little attention to community resilience. It could place greater emphasis on strengthening community-scale energy resilience through investment in resilient community infrastructure, neighbourhood energy systems, microgrids, community batteries and backup power at community hubs. These assets play an important role in supporting vulnerable residents and maintaining essential services during prolonged outages and extreme weather events.

8.3 Which actions do you consider most important for building resilience of the system of interest?

The AAP misses an opportunity to recognise the important role of local government in delivering place-based education, outreach, engagement and facilitation to help households and businesses understand and access state and Commonwealth energy efficiency, electrification and resilience programs and rebates.

Local governments also play a critical role in reaching vulnerable community members through trusted local partnerships, particularly households experiencing poor housing performance, energy hardship, and increased health risks during heatwaves and other extreme weather events.

The AAP should recognise councils as critical strategic partners in supporting the development and delivery of the renewable energy transition, with responsibilities spanning land-use planning, environmental assessment, community engagement, and managing cumulative local impacts.

8.4 Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

Action 1: Improve the energy resilience of existing homes to protect those most vulnerable to extreme heat

The AAP should better recognise local government as a key delivery partner in supporting households to improve energy efficiency, electrification and resilience through trusted local engagement and education.

There is an opportunity to strengthen commitments to existing programs (for example, Victorian Energy Upgrades, Solar Victoria and the State Electricity Commission) by expanding their reach to low-income and vulnerable households

most at risk from climate change and extreme heat due to poor housing performance and financial barriers to upgrades. The Alliances have previously advocated for sub-targets and a levy on VEECs to support local outreach and engagement with target communities. The AAP could also consider explicitly identifying partnerships with local government as an important delivery mechanism for these initiatives.

Action 2: Enhance the resilience of energy infrastructure by driving greater investment in climate resilient solutions

The AAP should recognise the importance of improving energy resilience for critical community infrastructure, including community halls, libraries, neighbourhood houses and other facilities that provide essential community support during emergencies, as well as critical service sectors such as health and emergency management.

The AAP references the 100 Neighbourhood Batteries Program; however, this program is fully subscribed and there is currently no commitment to continue or expand it. Achieving the outcomes under this action will require ongoing or new investment programs to support local energy resilience initiatives and community-scale resilience infrastructure. ‘

Action 3: Strengthen energy system emergency management frameworks and related plans to implement opportunities to effectively plan, mitigate, respond and recover

The AAP should recognise the critical role of local government in preparing communities to mitigate, respond to and recover from emergencies. Councils are acutely aware of the need to ensure that our emergency management planning arrangements consider current and future climate risks.

Action 4: Provide households, businesses and communities with clear energy resilience information, advice and tools

The Plan should recognise the important role of local government as a trusted partner in providing place-based information, education and engagement to help households and businesses improve energy efficiency, electrification and resilience.

There is an opportunity to better articulate the relationship between electrification, energy efficiency and energy resilience. Improving resilience requires progress across all three areas to ensure energy is affordable, used efficiently, and can be generated, stored and shared during extreme heat and other climate events.

The role of the State Electricity Commission should also be acknowledged. Its absence from the Plan creates uncertainty about its future role in supporting household and community energy resilience.

9. Draft Health and Human Services Adaptation Action Plan 2027-31

9.1 Which climate risks do you consider most important for the government to act on?

The actions in this AAP refer to the health and human services system. For the most part the actions call out initiatives for the State managed health system and public housing.

Victorian councils support community wellbeing through the planning, coordination and delivery of services including maternal and child health, immunisation, aged care, disability and youth services, family support programs, community development, public health initiatives and community safety programs. Festivals, events, meeting and sporting facilities are all supported at the local level and all impacted by climate risks.

Councils are often the interface between climate hazards and vulnerable people, providing public health support services to vulnerable communities (Meals on Wheels, Social Support, Maternal and Child Health and Youth and Children Services), and access to cool places of refuge. These important roles should be spelt out under the roles and responsibilities section of the AAP.

Of the risks listed in the plan the below are of most relevance to local government:

- Victorians increasingly experience adverse health and wellbeing impacts due to increased exposure to extreme weather events and changing climate.
- Victorians' access to care is reduced, disrupted or delayed as health and human services respond to more frequent surges in demand for care during extreme weather events and demand for care increases over time

9.2 Which opportunities do you consider most important for the government to act on?

There is an opportunity to expand focus on heat adaptation, household thermal comfort, energy hardship, community connection and targeted support for vulnerable residents. Councils need tools to identify and support communities with highest climate vulnerability.

The AAP should acknowledge the role of local government in supporting people in place through universal (maternal and child health) and targeted (home care) services. Extreme heat and heatwaves identified by councils as climate risks impacting specific population health, as well as intersecting with emergency events impacting whole communities.

9.3 Which actions do you consider most important for building resilience of the system of interest?

The case study on page 12 recognises that "the Department of Health has developed guidance to support Victorian councils to tackle climate change and its impacts on health through Municipal Public Health and Wellbeing Plans. The guidance includes a range of strategies and case studies to support accelerated action. There is no further reference to local government in the AAP, despite councils are often the "last mile" for climate health response.

The definition of health and human services in the *Climate Change Act 2017* are broad in nature and encompass the "services and assets which provide human physical and mental health care, social support and assistance".

The Plan could be strengthened by moving beyond emergency response towards prevention by outlining:

- cooling access, e.g. providing community facilities as 'heatsafe spaces',
- home upgrades
- social connection
- outreach and communications
- support for and collaboration between community service organisations building resilience.

Heat adaptation should be treated as an ongoing public health priority, not only an emergency management issue. The Heatwave Planning Guide for local government was developed responding to the impacts of heat on vulnerable communities by the DH Public Health Unit in 2009. The recent European extreme heat events only further demonstrate the need for leadership and guidance from all levels of government to support communities in staying safe in dealing with extreme heat.

Communities need to build capacity and resilience to respond to extreme heat through

- Improved communications products including clearer, simpler heat messaging and earlier warnings through all media
- Stronger support for vulnerable groups, including refugees, older people, and those in poor-quality housing.
- Better coordination with partners to understand vulnerable populations and their needs

It is unclear whether heat health actions in the previous plan were fully delivered.

9.4 Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

Action 1: Identify public health portfolio infrastructure most at risk to climate hazards and act on opportunities to improve resilience

This action could be expanded beyond state managed public health facilities to incorporate local government owned public health infrastructure. Support for councils would be required to enable this inclusion.

Action 2: Expand and integrate climate and health data, surveillance and reporting to enhance data-informed decision making and improve health outcomes for Victorians

This action would be strengthened by specifically calling out the requirements for greater vulnerability mapping that is accessible to all key agencies, including local government. Such data is critical to enable informed program design and decision-making during emergencies.

Councils need tools to identify:

- where vulnerability is concentrated,
- who is least able to adapt,
- where investment will have greatest benefit.

There is also an opportunity to undertake a vulnerability assessment through a gender lens, and comply with the *Gender Act 2020*, assessing how gender impacts climate vulnerability and planned mitigation measures.

Action 3: Develop a toolkit to standardise climate adaptation processes across the health infrastructure project lifecycle
Given the approach of the plan is wholistic, it would be good to be clear if references to health infrastructure encompasses local govt related infrastructure.

Action 7: Strengthen preparedness for climate related health emergencies by prioritising highest risk climate driven hazards and embedding a strengthened evidence base into emergency management planning, monitoring and early warning systems
As outlined in the State Emergency Management Plan, local government has a core lead and support role in delivering emergency mitigation response, relief and recovery services to its communities, in partnership with state-led systems. This includes community awareness and information.

This action could facilitate partnerships with local government to “provide an early notification of forecast, emerging or actual hazards that could cause a health emergency”.

Action 8: Manage and reduce the social housing portfolio’s exposure to climate hazards; Action 9: Improve the climate resilience of existing social housing; Action 10: Embed climate resilience in new social housing
Actions 8, 9 and 10 all focus on health improvements in social housing. There are no actions that relate to improved health outcomes for vulnerable Victorians more broadly. This includes actions to reduce susceptibility of homes to things like extreme weather events, and the provision of services such as cool places in the community, both of which councils have a lead role in. (links to energy plan).

Recommended New Action:
As noted above heat adaptation should be treated as an ongoing public health priority. Whilst we note that household health related to matters such as extreme heat, are addressed, in part, in the Built Environment Plan. It would be useful if there is a clear cross reference to this in the Health and Human Services Plan. This does not address, however, broader community heat health challenges.

There is an opportunity for the development of new guidance/support for councils to improve capability and capacity to respond to extreme heat.

10. Draft Education and Training Adaptation Action Plan 2027-31

10.1 Which climate risks do you consider most important for the government to act on?

All risks listed in the AAP are valid. Two risks which should be emphasised more are:

- Risks to the most at-risk individuals and communities, which could be usefully addressed through this AAP
- Risks to workforce capability, across sectors, from a lack of training in addressing adaptation.

10.2 Which opportunities do you consider most important for the government to act on?

The opportunities focus on improving workforce skills and understanding of climate change in the general community, but there are also significant additional opportunities through this AAP to address the following adaptation needs:

- Focus on the most at-risk individuals and communities
- Ensuring planning, design, location and procurement standards for new assets and services seek to minimise climate risks
- Support for nature-based solutions that connect Victorians to the natural environment, reduce emissions and build climate resilience.

10.3 Which actions do you consider most important for building resilience of the system of interest?

Action 1: Deliver guidance, training and programs to support the education system to prepare for, respond to and recover from climate-related emergencies.
While it is useful that the Climate Resilient Education partnership project to improve knowledge about climate risks is continuing, it would be useful to show what changes to policy, systems and processes will be made as a result of the project's findings and recommendations.

Action2: Provide support to schools and early-childhood education providers to manage the impacts of extreme temperatures on health, wellbeing and learning outcomes.
This action is important and necessary, acknowledging that schools already have processes for closing in extreme weather and fire danger. This action does present an opportunity to provide practical guidance to school communities – not just schools' workforces – to remain safe and well in extreme temperatures.

Action 3: Embed use of information about climate risks to improve how we plan, design, procure and construct government-owned education and training infrastructure.
It is disappointing that this action only refers to embedding evidence of climate-related risks and resilience outcomes into new facilities and DE offices, without mentioned upgrading of existing school facilities that are vulnerable to climate-related risks. Upgrades and new builds of schools and DE offices, not just TAFEs, should be included in the last dot point related to integrating 'innovative technologies and materials designed to mitigate climate risks into construction projects'.

This action provides an opportunity to support nature-based solutions in new school builds and potentially in major rebuilds, which may involve as little as designing buildings so that trees can be located close by to provide shade, or – more substantially – WSUD, green walls and so on.

The third point in this action, 'continue to support asset managers of government schools and government owned early childhood centres to respond to climate risks' should include support to 'understand' climate risks.

School councils play an integral role in managing schools, and therefore need greater support alongside school leadership teams to understand climate risk and exposure and build it into risk management processes of schools. DE risk management guidelines: Risk Management – Schools: Resources | education.vic.gov.au currently include no reference to climate risk, although climate change risks assessments have been completed for schools through the current AAP. VMIA has expectations that managers and board members (principals and school councils) will ensure that climate change is considered and risks managed.

Action 4: Share resources to help educators and teachers to teach about sustainability and climate change.
Despite one of the listed risks referring to mental health issues, support and resources related to climate anxiety of students and teachers have not been included. It would be useful for teachers across all subjects and year levels to be given support and guidance to embed sustainability/climate understanding at appropriate developmental levels.

Action 5: Invest in building a skilled and inclusive workforce and build capacity in climate-ready careers to support Victoria's transition to a net zero and climate-resilient economy.
The current AAP includes industry engagement on training needs to enable the transition to a net-zero carbon economy. This engagement should be periodically undertaken to ensure that training remains current in relation to needs.
This action also needs to include support for existing workforces, including in local government, to build their climate capability.

10.4 Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

In general, the AAP could focus on providing more practical support for schools and early years' providers, as well as standards and systems to increase adaptation performance. The following specific projects or programs could be undertaken to address these needs:

- Heatwave safe space assessments, to provide actions plans for adaptation upgrades
- Expansion of the Greener Government School Buildings revolving fund beyond solar PV to include batteries, HVAC upgrades and other adaptation measures
- Support for schools and early years' providers to track and report on utilities/waste through a central easy-to-use tracking system or portal provided by the Victorian Government.
- Increasing minimum environmental standards for schools to reach, including adaptation and climate risk decision-making for school councils, e.g. via the Environment Sustainability in Schools policy.

- Training and support for education institution leaders, business managers and school council members to explore and plan for adaptation, so staff resources and capital budgets can be planned and managed in the short- and medium-term, at both school level and departmental (central) budget level.

MAV would be pleased to provide clarification on any information in this submission. For further information, please contact Inquiries <Inquiries@mav.asn.au>

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