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Re: Draft Built Environment Climate Change Adaptation Action Plan 2022-2026

To the Built Environment Team,

Thank you for the opportunity to contribute to the Built Environment Climate Change Adaptation Action Plan 2022-2026, which seeks to strengthen and extend responses to climate change and build adaptation capacity across government, the private sector, and the community.

The National Trust of Australia (Victoria) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 30,000 members across Victoria.

As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that the wide range of natural, cultural, social, and Indigenous heritage values are protected and respected, contributing to strong, vibrant and prosperous communities.

This year we were proud to launch our [inaugural Climate Action Plan](#)¹, which will enable the National Trust to contribute tangible and meaningful action to address the climate and biodiversity crisis. We know that the climate crisis is the single biggest and fastest growing threat to people and cultural heritage worldwide. We recognise that if new strategies to mitigate and adapt to these changes are not initiated and actioned immediately, these impacts will have an unprecedented and irreversible effect on our cultural heritage, our connection to place, and our way of life. We also know that utilisation, care and protection of cultural heritage places will play an important role in building climate change resilience.

We are in support of creative and innovative policy, planning, and design solutions which will achieve carbon reduction and provide climate resilience. While we are supportive of a Built Environmental Climate Change Adaptation Action Plan, this submission provides some comments for consideration as the document develops. We recommend further discussion and consultation regarding our points outlined below.

General comments

As a high-level document, the Action Plan sets out a clear vision to support climate resilience across the government and private sector. However, there are some gaps in understanding exactly how future actions intersect with other work currently underway, for example Plan

¹ National Trust of Australia (Victoria), [Climate Action Plan 2021-2023](#).

Melbourne 2017–2050, and the actions being undertaken to reduce Victoria’s emissions (as referred to in the plan). We recommend adding a flow diagram which shows the relationship between this document and other relevant policies and Action Plans, and addressing this in the final priority actions.

Table 3 on page 9 of the Action Plan (“Built Environment system scope and long-term outcomes sought”) outlines the scope of the plan and the outcomes sought in a clear manner. It would be helpful to add an additional column to this table to show which actions are being applied to these outcomes.

Urban green spaces

We are in support of the principal of Outcome 2 in the Urban Green Spaces component of the Action Plan:

At least 30% tree canopy coverage (along with other vegetation) is provided across the urban landscape to support cooling and greening responses; using species, design measures and infrastructure to minimise bushfire risks where necessary.

This has the potential to be a meaningful outcome which will greatly support cooling and greening of cities and towns, and will help to mitigate the Urban Heat Island effect. Increased canopy cover also provides significant health and wellbeing benefits beyond cooling response, contributing to social and amenity values of neighbourhoods.

While Outcome 1 of Urban Green Spaces (“Water supply is available to maintain vegetation cover, parks and recreational spaces across Victoria’s cities, regional centres and towns to support urban amenity, cooling and wellbeing during periods of drought”) is supported in the plan by a place-based action (“13. Support drought resilience planning for regional cities and towns...”), it is not clear which future actions will facilitate Outcome 2. For example, an additional action could be included under place-based actions, such as “Support development of urban forest maintenance and planning”. This could also be fleshed out under potential responses to Action 1 (“1. Progressively update planning provisions to respond to climate change based on the most current advice from relevant natural resource and emergency management authorities.”).

We understand Outcome 2 is being supported by proposed planning provisions and design responses within Plan Melbourne 2017–2050, which is informing the Climate Change Adaptation Plan. Further information on how these plans tie in together would help clarify the connection between outcomes sought and priority actions.

While 30% canopy coverage in urban areas would be a welcome outcome, the plan should refine which areas will be targeted. “Across urban areas” is a vague term and requires clarification. It is not clear how the regions factor into this goal, if at all. “Across settlements” may be a more inclusive term, to include regional towns and population areas.

The plan does not outline how any actions will be measured. Without this information, a goal of 30% canopy coverage does not mean much. The action plan must clarify if this number applies across all Victorian settlement areas, and if it will be measured at a state or local level. Measuring by local government area is problematic and will not produce a meaningful

outcome, as forested areas and national and state parks will skew the result. If the goal is to provide cooling in areas of human habitation, the outcome will need to be measured in a more refined way. It is essential that the definition of urban area is clarified and an appropriate impact measurement tool is applied.

Urban green spaces require knowledge, skills and policy in and around management of existing parks and gardens, which is key in retaining and sustaining the role these places play in combatting and adapting to climate change. An additional outcome and corresponding action could therefore be added to this section with regard to managing, maintaining and protecting parks and gardens to ensure climate change resilience, beyond maintenance of water supply.

Heritage

As outlined above, it is unclear how the long-term outcomes identified in Table 3 relate to the adaptation actions at the end of the document. For example, the outcome “*Identify, manage and protect places with Aboriginal cultural value as well as heritage places and assets across the built environment*” is very broad with no linkage to actions beyond a risk audit. We recommend ongoing consultation with the National Trust, Heritage Victoria, and Heritage Council Victoria to rework these outcomes.

The Action Plan addresses the potential impacts of climate change on our cultural heritage but it should also highlight the opportunities that retention and protection of heritage provides in building communities and a built environment that is resilient to climate change. The important role built cultural heritage plays in combatting and adapting to climate change should be more clearly defined in the Action Plan with related outcomes and actions better articulated.

It is true that retention and protection of our cultural heritage places play an important role in climate change resilience, but this cannot occur unless cultural places are appropriately managed, maintained and protected using conservation processes.

Regular and ongoing maintenance is critical to retaining our cultural heritage places and this should be encouraged as part of the Action Plan. In addition, repair of heritage places using traditional methods not only uses more sustainable materials with less emissions, it ensures existing heritage buildings are more resilient and flexible to climate change. Regular maintenance and a conservation approach to repairs and works also reduces the resources required to address greater building deterioration issues in the future and/or inappropriate repairs that need to be reversed.

Regular maintenance and repair using traditional methods and good management to support these conservation processes in turn protects and retains our heritage places in good condition, so they are sustained into the future and are available for adaptation. We recommend that management is further clarified in the long-term outcome and actions.

There is also an opportunity for the Action Plan to pursue a long-term outcome that can adapt and protect heritage while also reducing emissions, by supporting adaptive reuse of existing buildings, including heritage buildings.

A ground breaking 2011 study by the US National Trust for Historic Preservation—“[The Greenest Building: Quantifying the Value of Building Reuse](#)”²—concluded that, when comparing buildings of equivalent size and function, building reuse almost always offers environmental savings over demolition and new construction. The study found that it takes between 10 to 80 years for a new building that is 30% more efficient than an average-performing existing building to overcome, through efficient operations, the negative climate change impacts related to the construction process, and that collectively, building reuse and retrofits substantially reduce climate change impacts.

This is further supported by [recent research](#) undertaken by Historic England³, which found that when a typical historic building is refurbished and retrofitted, it will emit less carbon by 2050 than a new building.

Locally, [research](#) undertaken by architect Ruth Redden⁴ explores the nexus between heritage conservation and sustainability in the Australian context, highlighting broad environmental benefits of conserving historic buildings, and providing recommendations for the production of guidelines and resources to support the promotion of sustainable preservation.

We recommend the following long-term outcome be included in the plan with a corresponding action:

Outcome: Identify and support conservation and adaptive reuse of existing buildings, including heritage buildings, as an alternative to new construction.

This outcome could fit under either “New and existing buildings”, or under “Heritage”.

It is not clear if Outcome 2 in the Heritage component of the Action Plan (“*Retrofit heritage buildings with energy efficient systems to reduce the cost of comfort as a result of climate change*”), is covered under Action 4 (“*4. Pursue opportunities for upgrades of existing building stock, with a focus on improvements to housing for low-income and vulnerable Victorians...*”). There is room to refine the wording of Action 4 to incorporate built heritage. Again, adding corresponding actions to long-term outcomes in Table 3 would assist in understanding this.

In order to ensure the ongoing retention and protection of our cultural heritage places, as well as enabling necessary adaptations and retrofitting, it is a priority action that the heritage industry is strengthened to assist with these processes. Tradespeople and practitioners with the necessary conservation skills to undertake appropriate repairs and works to heritage buildings, as well as practitioners with skills to navigate the heritage approval framework, are

² National Trust for Historic Preservation, [The Greenest Building: Quantifying the Environmental Value of Building Reuse](#), 2011.

³ Historic England, [There’s No Place Like Old Homes: Re-use and Recycle to Reduce Carbon](#), 2020.

⁴ Ruth Redden, [Greening Historic Buildings: A study of Heritage Protection and Environmental Sustainability](#), International Specialised Skills Institute, 2014.

required. A priority action in relation to achieving this is therefore recommended under point 7 of the 5 Year Action Plan such as:

Strengthen the capacity of the heritage industry to support sustainable practice in repair, maintenance, management and adaptation of cultural heritage places.

The heritage approvals framework at State and Local level also needs to be reviewed in relation to adaptation and retrofitting culturally significant places in response to climate change. As a result, it is recommended that point 15 in the 5 Year Action Plan be expanded to incorporate this requirement.

Finally, we recommend clarifying the definition of heritage provided at page 9, to encompass the range of heritage places and values protected under relevant legislation, and the overlapping nature of heritage values. Suggested text for the broad definition is provided below:

Places of Aboriginal and non-Aboriginal natural, historic, cultural, aesthetic, scientific, social, creative, and technical value in cities and towns.

Conclusion

The National Trust recognises emissions reduction and climate adaptation action as urgent and essential work, and would welcome future opportunities to provide comment and feedback on the action plan as it progresses. For enquiries regarding this submission, please get in touch with this office on 9656 9820 or with me directly at felicity.watson@nattrust.com.au.

Kind Regards,



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