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Re: Victoria's draft Adaptation Action Plans 2027-31

To Whom it May Concern,

Thank you for the opportunity to contribute to Victoria's draft Adaptation Action Plans 2027-31, which seek to build on the first Adaptation Action Plans 2022-26, and outline actions the Victorian Government will take to strengthen the state's resilience to the impacts of climate change.

I write to you on behalf of the National Trust of Australia (Victoria) (National Trust). We are the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy. We are custodians of 38 places across Victoria, including government owned assets, in operation since 1956, and we are currently delivering on our second organisational [Climate Action Plan](#).

The National Trust supports the draft Adaptation Action Plans' overall direction and the Victorian Government's continued investment in climate resilience. However, across the eight system plans, heritage places are treated almost exclusively as an asset at risk from climate change, rather than as tools and resources for addressing it. Older buildings, water and energy systems offer opportunities for understanding low cost and effective ways of minimising carbon emissions and mitigating the effects of climate change. Additionally, retaining, maintaining, retrofitting and adaptively reusing existing buildings, and cultural landscapes deliver measurable climate benefits such as, reduced embodied-carbon emissions, greater infrastructure resilience to climate change impacts, cooler cities and stronger biodiversity outcomes.

This submission sets out our recommendations to strengthen these Plans by including consideration of heritage places, conservation and traditional trades skills.

Recommendations:

Built Environment — Existing Buildings and Building for the Future

Embodied Carbon

- INTEGRATE heritage conservation explicitly into the Adaptation Action Plans as a climate mitigation and resilience measure, not only as an asset at risk from climate change.
- RETAIN and STRENGTHEN the 2022–26 Built Environment Plan's commitment to identify and support adaptive reuse of existing buildings as an alternative to new construction, attaching measurable actions, timeframes and funding.
- APPLY disincentives/costs for demolition of existing building fabric (loss of embodied carbon).
- REQUIRE applicants to demonstrate that adaptive reuse has been genuinely explored before a demolition permit is granted, and REQUIRE a planning permit for the replacement building before any demolition permit is issued.
- QUANTIFY and DOCUMENT embodied energy (carbon) savings and environmental benefits of existing building retrofit and adaptive re-use projects.
- REMOVE planning-control exemptions currently available to State Government departments and authorities (e.g. VicTrack, the Departments of Education and Health) for infrastructure projects affecting existing buildings, and REQUIRE State projects to lead by example in retention and adaptive reuse.

Heritage Buildings Maintenance and Reuse

- DEVELOP and IMPLEMENT incentive programs — streamlined approval pathways, rate relief, targeted grants — for retention, retrofitting, adaptive reuse and restoration of heritage and other existing buildings.
- FUND an ongoing revenue stream for the retrofitting and adaptive reuse of existing buildings.
- Reinstate the Living Heritage Grants program to fund heritage conservation works as well as ongoing maintenance to build resilience for Victoria's heritage buildings and mitigate the need for emergency repairs.
- ENSURE that there is capacity and supplies for managing repairs and maintenance to all building stock by SUPPORTING small trade and manufacturing businesses.
- REVIEW building regulations to recognise traditional and vernacular building typologies and materials, rather than applying uniform contemporary performance measures across all building types.

Public Green Space and Canopy Trees

- RECOGNISE that sufficient green infrastructure, including trees and urban green spaces, are essential to climate change adaptation and liveability within our cities as they become hotter and more densely populated.
- SET and ENFORCE minimum public open space targets for each Local Government Area, calculated against forecast population density rather than current provision, and create minimum service / funding levels to ensure that they are maintained and useable, and new areas of useable public open space can be established where required in areas of greater population density.
- REVIEW Planning Practice Note 7 (Vegetation Protection in Urban Areas), unchanged since 1999, and support Councils to implement it through targeted professional development.
- REVIEW and UPDATE Significant Landscape Overlays across Victoria to reflect current values, conditions and climate-change context.
- INCREASE protection of existing canopy trees on public and private land to help deliver the State Government's 30% Canopy target.
- LEGALLY PROTECT significant trees (those on Council and the National Trust Register of Significant Trees) as a base level for preserving our urban tree canopy. RECOGNISE that new replacement trees will not provide equivalent or adequate benefits for many decades, if at all.
- EXPAND tree canopy protections to ensure tree removal is a last resort. RESOURCE local government to monitor and ensure any replacement canopy trees are properly established and maintained into the future.
- INCREASE penalties for illegal removal of significant trees and vegetation.
- INCENTIVISE private landholders to retain significant trees and privately owned green space and EXPLORE partnership models that expand public access to private green space, e.g. the National Trust/City of Glen Eira residents access arrangement at Rippon Lea Estate (see below).

Education and Training

Workforce Capacity

- IMPROVE trade training in the conservation and retrofitting of existing buildings and ADOPT the following action under the Education and Training Plan: "Strengthen the capacity of the heritage industry and the construction industry more broadly to support sustainable practice in repair, maintenance, management and adaptation of buildings".

- **FUND** and **DELIVER** horticultural, arboriculture and water sensitive urban design training not only for people working directly within these industries, but to the people who plan our towns: Landscape Architects, Architects, Urban Designers and Planners.
- **STRENGTHEN** education and training for design professionals—including architects, engineers and interior designers—in working with existing buildings, so they have the knowledge, skills and confidence to understand, value and sensitively work with existing building stock.
- **LEVERAGE** the position of custodians of building portfolios such as The National Trust with funding and support to provide trade training pathways.

Energy

Renewable Infrastructure and Biodiversity

- **REQUIRE** renewable energy infrastructure site assessments to evaluate the impact on biodiversity and land use change as a priority, including full lifecycle impacts — construction, decommissioning and rehabilitation.
- **PROTECT** national parks, conservation areas and other high-biodiversity sites from renewable energy infrastructure impacts, directing development to lower environmental value sites. **ENSURE** significant buffer zones are maintained between energy developments and high value areas.
- **REQUIRE** early, genuine and ongoing community and Traditional Owner consultation in renewable energy project planning, including benefit-sharing.

Supporting Information

National Trust

Our Position

Heritage is climate action. Conserving, retrofitting and reusing existing buildings avoids the embodied-carbon cost of demolition and new construction; well-managed heritage gardens and landscapes deliver urban cooling, biodiversity and community wellbeing benefits that new green infrastructure cannot replicate within the same timeframe. The Adaptation Action Plans should treat heritage conservation as core climate infrastructure — resourced and embedded accordingly — rather than as a constraint to be managed around growth and energy targets.

Previous Submissions to Government

The National Trust has engaged extensively with government on the intersection of heritage and climate policy. In 2021, our submission on the draft Built Environment Climate Change Adaptation Action Plan recommended that the plan recognise the embodied-energy value of existing buildings and support adaptive reuse as an alternative to new construction; both recommendations were adopted as objectives in the final 2022–26 Plan.

In July 2024, our submission to the Parliamentary Inquiry into Climate Resilience in Victoria again emphasised heritage conservation's role in climate mitigation and called for stronger protection and funding for green space. We were concerned by the Inquiry's final report however that while it noted submissions that raise issue with the potential of heritage buildings being energy inefficient there was no reference to the National Trust's evidence that factually disproves such sweeping generalisations. This misconception is a persistent stereotype we wish to address.

Comments on the system Adaptation Action Plans

Built Environment: cities, towns and regional areas, and how people use and interact with services, infrastructure, buildings, natural and cultural features, and public places.

Embodied Carbon

Heritage is climate action. The built environment is the world's single largest contributor to greenhouse gas emissions, consuming around 33% of our water and generating 40% of our waste. The US National Trust for Historic Preservation's 2011 study "The Greenest Building" found that, for comparable buildings, reuse almost always delivers environmental savings over demolition and new construction — a new building 30% more efficient than an average existing building can take 10 to 80 years to offset the carbon impact of its own construction

Historic England research similarly found that refurbished historic buildings emit less carbon by 2050 than equivalent new builds. Australian research by architect Ruth Redden supports this conclusion locally and recommends sector guidance to promote sustainable preservation practice.

Heritage-led retrofit should be a central component of Victoria's climate strategy, however the focus of this Plan continues to be on operating emissions in contemporary construction standards (slab floor, cavity frame and heater and cooled by mechanical systems) and not on the carbon and material cost of our current construction industry. Existing buildings contain embodied carbon, and their retainment has high value in this regard alone.

It is essential that we protect the embodied carbon in existing building stock and ensure their ability to perform in extreme weather events. Unfortunately, the same systems which often disincentivise retaining buildings are also limiting the construction of new vernacular

buildings, buildings which respond to place through their design and construction, through material selection, landscaping and passive design principles.

Heritage Buildings, Maintenance and Reuse

The Global Alliance for Building and Construction is cited for the finding that "current renovation rates must increase from 1% to 3% of all building work to achieve net zero carbon by 2050." However, government policy continues to favour demolition and new construction over reuse. Despite being a significant element in building energy there are currently no regulations or targets in Australia relating to embodied energy in the built environment. There is no legislative requirement to demonstrate the need to demolish an existing structure and as a result, Australia continues to demolish major infrastructure well short of its lifecycle.

Few incentives exist for retrofitting or restoring existing buildings, while contemporary building-performance measures are applied uniformly regardless of typology – disproportionately burdening older and heritage building stock. The current Australian Green Star ratings system primarily applies to new buildings.

Furthermore, our experience as building custodians and heritage professionals and practitioners has shown us that there is a lack of appreciation for how regular maintenance and repair using traditional methods reduces emissions, extends building lifespans, and avoids the resource cost of major deterioration or maladaptation requiring later reversal. Delivering this depends on a construction and design workforce with conservation skills, addressed further under Education and Training below.

Additionally, state funding that used to support a system of resilient maintenance works for heritage buildings has now been discontinued. The Living Heritage Grants program used to provide practical support for custodians and government bodies maintaining heritage buildings and infrastructure.

Public Green Space and Tree Canopy

It is also important to stress that nature does not only occur in wild places or conservation areas. Our urban ecology hosts myriad lifeforms and supporting healthy urban biodiversity is another crucial element in building resilience to climate change. The current Adaptation Plan for the Built Environment makes almost no mention of green spaces as a fundamental part of our urban infrastructure. The built environment is not limited to buildings and providing adequate green infrastructure is absolutely critical to climate adaptation within our cities and towns. The cooling effect of tree canopy and green spaces is crucial to mitigating the effects of increasing heat and ensuring our cities are safe and healthy places to live.

As our cities and towns become hotter and more densely populated, the number of trees and green spaces provided will need to increase. Achieving this is complicated by the loss in privately owned green space that can be expected through consolidation and in-fill development of existing suburbs. This places even greater demands on shared green spaces.

Public open space provision is particularly concerning in areas identified for the new Train and Tram Activity Centre planning changes. Public open space provision (at an SA3 level) is already poor in areas containing the bulk of these Activity Centres, such as Glen Eira (4.2%), Stonnington (6.7%) and Boorondara (5.1%). With an inevitable reduction in private open space through development and increased demand through population growth, a net increase in green spaces, measured across both public and private land is essential. Failure to adapt to a net increase in green space will see communities face greater climate impacts than is necessary.

Case Study Example: National Trust/City of Glen Eira residents access arrangement at Rippon Lea Estate

Private and institutional heritage gardens are an underused part of the solution. They typically sit in established, high-density areas with low public open space, deliver stronger biodiversity outcomes than equivalent-sized new green space through their structural complexity, and can potentially be added to the public open space network through partnership rather than acquisition. At the National Trust's Rippon Lea Estate in Elsternwick — a Top 5 biodiversity hotspot in Glen Eira, the Victorian LGA with the lowest public open space provision — a partnership with the City of Glen Eira sees Council contribute to maintenance costs in exchange for free public entry to the 14-acre garden. Similar arrangements should be identified and pursued across other privately held green space.

Rippon Lea Estate is also an outstanding example of adaptation through its visionary integrated water management infrastructure. This water harvesting, storage and irrigation system is a 150-year-old model of best practice water sensitive urban design. It demonstrates what can be achieved through good design when working with, rather than against, existing conditions. It also highlights the longevity and increasing value of heritage assets that are properly maintained and sensibly adapted to modern requirements.

At a larger scale, Significant landscapes are protected under the Heritage Act 2017 and the Planning and Environment Act 1987 (via the Significant Landscape Overlay), and through the Distinctive Areas and Landscapes program. Many Councils use these tools, but many Significant Landscape Overlays have not been updated to reflect current values, conditions or climate-change context.

Regarding tree canopy provision, we support the recent introduction of a 30% canopy target across the state and the More Trees for Melbourne funding program. We also welcome the introduction of uniform canopy tree protection provisions through Clause 52.37. However, these provisions rely heavily on the planting of replacement trees where existing trees are deemed to restrict housing development. Replacement trees will take decades to match the benefits provided by those they replace – and only if they are properly established and maintained over those decades. If a 30% canopy target is to be achievable, it is far preferable that existing trees are only removed as a last resort. Where this is unavoidable, resourcing of authorities to ensure replacement trees are maintained well beyond building certification will be required.

We have particular concern for the many thousands of trees recognised as significant across Victoria. The National Trust's Register of Significant Trees lists over 15,000 trees across 1,500 Victorian locations, and many Councils also maintain Significant Tree Registers. These trees have been identified by experts as exemplars of our living heritage. They are often of enormous social importance, having stood for well over a century, and yet many would qualify for removal under Clause 52.37, simply due to their location on a block. Through the environmental and social benefits they provide, we argue these significant trees are effectively irreplaceable. We propose that additional legal protection be provided for these trees, and a centralised significant tree register and agency developed which provides guidance on their retention and ongoing care.

Education and Training: the services and assets primarily engaged in the planning, development, provision and support of education and training, including future workplace skills and needs.

Workforce Capacity

As we have outlined above, there is a clear need for skills training across all construction trades, not just to retrofit energy solutions such as solar but to be able to manage existing buildings, complete maintenance, repairs and adaption solutions. The most resilient building which can perform for its occupants is a well maintained one. With more support for this understanding more of the public can be educated on how to manage and maintain their homes for longevity, performance and reduced emissions.

Delivering climate adaptation depends on a workforce with the skills to do it, including traditional heritage skilled tradespeople able to carry out conservation-grade repairs, and designers and practitioners able to work with — rather than around — existing buildings. However, the capacity does not currently exist at the scale that the Plans require.

Additionally, having the knowledge and skills to deliver high-performing green and blue infrastructure lies not just within the horticulture and arboriculture fields, but also allied planning professions, such as Landscape Architects, Architects, Urban Designers and Civil Engineers. Investing in this knowledge will encourage greater diversity and creative planning of sustainable, cooler and more liveable places into the future.

Energy: the generation, production, transmission, storage and distribution of energy (electricity, gas and liquid fuels) and how people use and rely on energy as an essential service.

Renewable Infrastructure and Biodiversity

The National Trust supports the transition to renewable energy and recognises it cannot be achieved without some impact on local places, landscapes and ecosystems. Associated infrastructure — haul roads, transmission lines, storage facilities — can affect communities

and biodiversity as much as generation infrastructure itself, and should be assessed accordingly, including long-term decommissioning and rehabilitation costs and any precedent a project sets for future land-use change.

High-biodiversity sites, including National Parks, conservation areas and other ecologically significant places (including buffer zones) should be protected from development impacts rather than seeking to offset those impacts elsewhere. Biodiversity value is often highly localised and not transferable. Within renewable energy projects themselves, there is scope to improve biodiversity outcomes directly, through measures such as water quality improvement, grassland management, habitat planting or predator-free zones.

Thorough, early and ongoing consultation – including with Traditional Owners – is essential to identifying the places of greatest cultural and ecological significance before siting decisions are made, and to sharing the benefits of projects with affected communities.

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 Adaptation Action Plans as they progress. For enquiries regarding this submission, please get in touch with this office on 9656 9818 or conservation@nattrust.com.au.

Yours Sincerely,

A handwritten signature in black ink that reads "Maddi Moore". The signature is written in a cursive, flowing style with a small heart symbol above the 'i' in "Maddi".

Maddi Moore
Advocacy Strategic Manager
National Trust of Australia (Victoria)