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20 July 2026

Dept of Energy, Environment and Climate Action
8 Nicholson St
Melbourne VIC 3000

To whom it may concern,

Merri-bek City Council submission to Victoria's draft Adaptation Action Plans 2027-31

Merri-bek City Council welcomes the opportunity to provide a submission to Victoria's draft Adaptation Action Plans 2027-31.

Merri-bek, located between 4 and 14 kilometres north of the Melbourne central business district and bordered by the Moonee Ponds Creek to the west, Merri Creek to the east, Park Street to the south and the Western Ring Road to the north, is home to 191,747 people.

Merri-bek acknowledges we are in a state of climate emergency that requires urgent action by all levels of government. Council has a record of developing and delivering innovative climate initiatives to help our community adapt. Some of our programs are filling a void left by other tiers of government – much more needs to be done by other tiers of government. We welcome the Victorian Government's work on climate adaptation and are keen to see immediate work on the ground to help communities adapt to the short, medium and long-term impacts of climate change.

The most significant climate-related risks currently facing the Merri-bek community are heatwaves, extreme storms, flooding, and the resulting power outages and disruptions. Among weather and climate events, extreme heat has the greatest impact on the loss of lives in Australia. Climate change does not affect everyone equally – its impacts are disproportionately felt by groups like First Nations people, older people, refugees, and migrants. There is a need to ensure that any actions taken to reduce climate risk in our community address existing disadvantage and does not widen existing inequalities.

Council's current Climate Risk Strategy seeks to address this inequity by supporting a climate-ready and resilient Merri-bek community, with no one left behind. Addressing inequalities in climate adaptation requires both local and systems approaches, and coordination among different organisations, including Victorian Government agencies and local councils.

Merri-bek City Council supports the direction of the draft Victorian Adaptation Action Plans and the recognition of climate adaptation as a whole-of-government priority. The Plans

demonstrate that the Victorian Government has a strong understanding of climate risks and the actions required to respond.

The next challenge is implementation. Over the coming five years, success will depend less on developing additional strategies and more on delivering adaptation measures at the scale and pace required. This will require sustained investment, clear accountability, stronger partnerships with local government and communities, and embedding climate risk into governance, planning, investment and service delivery. The recommendations in this submission are intended to strengthen the Plans, so they support practical, funded and coordinated implementation across Victoria.

In particular, we call on the Victorian Government to:

- Ensure the 2027–31 Adaptation Action Plans are supported by the investment, governance, and accountability required to deliver implementation at a scale commensurate with Victoria's climate risks.
- Fund new and additional adaptation actions for the action plan period to help communities, households and local governments respond to increasing climate risks and support an equitable transition.
- Publicly report on outcomes, implementation progress and funding allocated under both the 2022-26 and 2027-31 Adaptation Action Plans.

The following submission has been prepared by officers and is based on endorsed Council policies.

Conclusion

Thank you for the opportunity to provide feedback to the Draft Victorian Adaptation Action Plans. As the risks and opportunities of climate change become increasingly clear, it is imperative that all levels of government work well together to strengthen community resilience.

The success of the Adaptation Action Plans will ultimately be measured not by the number of strategies produced, but by the extent to which they reduce climate risk through practical implementation. Embedding climate risk into all government planning, investment and decision-making so adaptation becomes core business rather than a standalone climate program is essential.

Should you require further information please contact Victoria Hart, Manager Sustainability and Climate via vhart@merri-bek.vic.gov.au.

Yours sincerely



Pene Winslade
DIRECTOR PLACE AND ENVIRONMENT

Recommendations summary

Merri-bek City Council makes 27 recommendations to strengthen Victoria's Adaptation Action Plans 2027–31. These recommendations are guided by three overarching priorities:

- Move from planning to funded implementation.
- Strengthen governance and partnerships across all levels of government.
- Embed climate risk into everyday government decision-making and investment.

The recommendations below provide practical actions to support these priorities.

General Recommendations

1. Fund the implementation of the eight Adaptation System Plans.
2. Report on outcomes and disbursed funding for the 2022 – 2026 Adaptation Action Plans and forthcoming 2027 – 2031 Adaptation Action Plans.
3. Work with the federal and local governments to re-set roles and responsibilities through establishing a multilevel governance approach to climate adaptation. Strong governance should support coordinated implementation, monitoring and continuous improvement across all levels of government.
4. Establish a cross-government implementation and coordination function to oversee delivery of the Adaptation Action Plans, monitor progress, identify implementation barriers, facilitate collaboration across sectors and levels of government, and share lessons and best practices.

Built environment action plan

5. Set up a fund to allow local governments to proactively upgrade and improve the resilience of infrastructure such as neighbourhood houses, libraries, and maternal and child health facilities that are vulnerable to climate change and that are used by the most at-risk groups.
6. Provide a decision on the Elevating ESD Targets Amendment C223 that allows it to proceed to preparation and exhibition, where it can be tested through public and stakeholder feedback.
7. Engage with Victorian Councils to introduce stronger climate resilient design standards for all buildings to create homes that are healthy, comfortable and affordable to live in, now and in the future.
8. Provide funding and support place-based community preparedness and engagement activities designed to meet the needs of different demographics.

Education and Training action plan

9. Commit dedicated statewide capital investment — in both government and non-government schools - to retrofit school buildings and early childhood facilities and green school grounds, so that all children have access to cool, safe learning environments during extreme heat.
10. Invest in opportunities for young people to participate in climate action.

Energy action plan

11. Support the Victorian Greenhouse Alliances advocacy for federal funding, and a strategic partnership between the Victorian Government and local government to establish a scalable home energy upgrade program, that provides tailored education and community outreach, connection between households and vetted suppliers, sustainable property linked finance, targeted subsidies, all under the guidance of trusted local councils.
12. Progressively strengthen the Rental Minimum Standards to reduce exemptions and ensure all rental homes provide healthy, climate-resilient living conditions

Health and human services action plan

13. Specify the data and information system that will support climate and health adaptation.
14. Ensure climate risk assessment and other housing portfolio asset assessments are shared with residents and community stakeholders.
15. Integrate energy efficiency programs with a comprehensive renovation and retrofit approach to existing social housing renewal, with a focus on avoiding or minimising resident relocation.
16. Require all new Homes Victoria social housing to meet minimum climate resilience and sustainability standards, supported by updated design guidelines.

Natural environment action plan

17. Commit dedicated investment in open space, tree canopy, nature, and waterway improvements and restoration to support ecosystem services such as cooling and shade, soil stabilisation, and flood mitigation, including funding accessible to councils and community groups.
18. Reduce the minimum clearance space for uninsulated low-voltage lines in Low Bushfire Risk Areas (LBRA) from 1000 mm to 300 mm.

Transport action plan

19. Release climate change guidance on assessing climate vulnerability and risk, designing for resilience, and adopting preventative maintenance, consistent with Infrastructure Victoria's recommendation, so that all transport asset owners — including local government — are working from a consistent, evidence-based approach to risk assessment.
20. Develop and publish guidance, standards, specifications and technical notes for climate-resilient and sustainable roads, bridges and civil infrastructure assets, including worked examples and case studies of how these have been successfully delivered in Victoria, to close the current gap between the aspiration for resilient infrastructure and the practical, on-ground guidance needed to deliver it.
21. Design and roll out a capability-building program for transport asset managers, including local government staff, to build the skills and confidence needed to assess climate risk, apply resilience standards, and prioritise preventative maintenance across the transport network.
22. Invest in cooler transport networks, including tree canopy, shade and heat-resilient materials along key transport corridors and at public transport infrastructure, to protect

both the infrastructure itself and the growing number of Victorians walking, cycling and using public transport as the urban population increases.

23. Attach dedicated funding to the implementation of adaptation actions, so that resilience measures identified through climate risk assessments and business cases are reliably funded and delivered, rather than competing unsuccessfully against other capital priorities.

Water cycle action plan

24. Fund upgrades and renewal of drainage networks and increase the number of water sensitive urban design assets.
25. Strengthen Action 2 by providing funding, technical guidance and capability building across local governments to deliver climate-resilient drainage infrastructure, floodplain management, water sensitive urban design and flood-resilient public infrastructure, including support for consistent decision making related to planning permits and floodplain management.
26. Strengthen Action 3 by funding practical local innovation projects, including stormwater harvesting, recycled water, passive irrigation, nature-based flood mitigation, urban greening and circular water outcomes, in partnership with researchers, Traditional Owners, water authorities and councils.
27. Strengthen coordination between Victorian Government, water authorities and councils to ensure local adaptation priorities are reflected in regional and statewide water cycle planning, investment and delivery.

Merri-bek City Council's climate adaptation policies

Council is committed to reducing the greenhouse gas emissions that cause climate change while supporting the Merri-bek community in adapting to its now unavoidable impacts.

Our Zero Carbon Merri-bek 2040 Framework sets out Council's vision for a zero-carbon future by 2040. Given that the impacts of climate change are escalating rapidly, Council, in 2021, adopted more ambitious targets to achieve 75 per cent emissions reduction by 2030, net zero by 2035 and drawdown ('negative emissions') by 2040. For Council's own operational emissions, we have an ambitious target range of between 80–100 per cent reduction by 2030 (precluding offsets, against 2011-12 baseline).

Our Climate Emergency Action Plan 2025-30 sets out Council's climate advocacy priorities and actions – which include:

- A socially just transition and resilient community with no one left behind;
- Managing our energy transition to efficient and 100 per cent renewable sources;
- Sustainable transportation;
- Promoting a circular economy; and
- Establishing Council as a role model.

Merri-bek's Climate Risk Strategy describes how Council will proactively plan for and respond to the inevitable impacts of climate change. Our Vision is that, by 2030:

- Council competently, accountably, and responsively manages climate risk; and
- Merri-bek is climate-resilient, leafy and liveable; with -
- A climate-ready and resilient community with no one left behind.

Merri-bek has a range of endorsed strategies and action plans to protect the natural environment including:

- The Integrated Water Management Strategy and Action Plan outlines Council's vision for taking care of our waterways and precious water supplies, including responding to flooding and water security risks through flood mitigation measures, water sensitive urban design, stormwater harvesting, improved permeability, alternative water use and resilient open spaces.
- The Urban Forest Strategy sets out actions and targets to increase Merri-bek's tree canopy to 29 per cent by 2050.
- The Nature Plan outlines Council's vision for enhancing biodiversity and celebrating nature in our city.

The Merri-bek Planning Scheme is the statutory planning document that controls land use and development across the municipality. The Planning Scheme's Municipal Planning Strategy (Clause 02) provides the strategic directions for sustainable communities. Clauses 15.01-2L-05 03-4 encourage environmentally sustainable design in development. These provisions recognise that sustainability principles reduce living costs, improve liveability, reduce emissions and build climate resilience.

However, through the recent residential code reforms, these local policy provisions have been codified and are no longer able to be applied to the assessment of residential development applications. While the new residential codes include a number of minimum sustainability standards, the reforms reduce Council's ability to require developments to achieve Merri-bek's established best-practice ESD outcomes. Where the codified standards are met, Council has limited scope to seek additional or locally responsive measures. This may result in lower energy and water efficiency, reduced climate resilience, higher household running costs and increased emissions over the life of new residential buildings.

General recommendations

While Merri-bek strongly supports the direction of the draft Adaptation Action Plans, we are concerned that the Plans remain heavily focused on policy development, guidance and collaboration. The greatest challenge facing Victoria is no longer understanding climate risks but implementing adaptation at the scale and pace required. Successful implementation will require sustained investment, clear accountability and strong partnerships between the Victorian Government, local government and communities.

Address equity and social justice:

Ensure that climate resilience policies and initiatives prioritise equity, social justice, and the needs of vulnerable populations, including First Nations communities, low-income households, and regional areas.

Fund adaptation plans

The policy direction for climate adaptation is now well established. The priority for the next Action Plans period should be implementing funded adaptation actions at the scale required. The Victorian Adaptation Action Plans across seven systems and regions were developed in 2022 but appear have been largely unfunded. The new draft Action Plans do not specify any new funding for programs or initiatives, and the proposed actions are fewer, less ambitious, and focused almost entirely on research, guidance, frameworks, knowledge-sharing, and embedding climate considerations into decision-making. Without dedicated implementation funding, (including regional climate adaptation initiatives) there is a significant risk that many proposed actions will remain strategic intentions rather than practical improvements that reduce climate risk for Victorian communities.

Report on outcomes, funding and progress

Publicly report on outcomes and disbursed funding for programs and initiatives under the previous and current action plans. This remains outstanding, despite calls for reporting through the Parliamentary Inquiry on Climate Resilience.

Establish multilevel climate adaptation governance

There should be clear roles, responsibilities, and accountability for each level of government and agencies to plan, fund, implement, and reporting on action plans and their outcomes. The *Many Hands Makes Light Work* report recommends a 'multilevel governance' approach,[1] promoting effective coordination between and across all levels of government to turbocharge climate action and give those on the frontlines a seat at the decision-making table. The multilevel 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.

Local government representation on adaptation coordinating body

We support the Victorian Council of Social Service's (VCOSS) recommendation to designate a coordinating body for implementation of the Action Plans. Coordination should also involve

[1] Melbourne Centre for Cities, Many Hands Make Light Work, July 2023.

local governments, Victoria's Greenhouse Alliances, and community service organisations, as well as the Commonwealth Government, as set out in the National Adaptation Plan and associated action agenda. The entity responsible for coordination at the Victorian Government level, such as DEECA's adaptation team, should be sufficiently resourced to play this role.

Promote community and place–based adaptation approaches

Climate change impacts are experienced most acutely at the local level, making community-based adaptation an essential component of climate resilience.

Merri-bek's place-based resilience work in Fawkner has demonstrated that trusted local relationships, community development and integrated service delivery can significantly strengthen preparedness and adaptive capacity, particularly among culturally diverse and vulnerable communities.

There is a need to foster community engagement and capacity-building initiatives to raise awareness of climate risks, empower local communities to act, and facilitate bottom-up approaches to adaptation planning and implementation. We also need to engage our communities in the planning and preparations for climate disasters. As noted in VCOSS's *Communities at the centre: Insights from the Multicultural Resilience Project* the best solutions are those that come from within communities.[2] To invest in preparedness, long-term recovery, and resilience with multicultural communities we need to:

- Build trusted relationships;
- Co-design communications;
- Enable community led, place-based support; and
- Ensure sustainability.

Recommendations:

1. Fund the implementation of the eight Adaptation System Plans
2. Report on outcomes and disbursed funding for the 2022-26 Adaptation Action Plans and forthcoming 2027 – 2031 Adaptation Action Plans.
3. Work with the federal and local governments to re-set roles and responsibilities through establishing a multilevel governance approach to climate adaptation. Strong governance should support coordinated implementation, monitoring and continuous improvement across all levels of government.
4. Establish a cross-government implementation and coordination function to oversee delivery of the Adaptation Action Plans, monitor progress, identify implementation barriers, facilitate collaboration across sectors and levels of government, and share lessons and best practices.

[2] VCOSS, Communities at the centre Insights from the Multicultural Resilience Project.

Feedback on draft Adaptation Action Plans

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

Supporting the resilience of council assets

Merri-bek City Council manages assets worth over $1.94 billion that are used to provide numerous services and facilities to the community.[3] The cost of retrofitting or rebuilding infrastructure after damage from extreme events is likely to become unsustainable. The expected service levels and provision of key infrastructure is also changing. For example, the community expectation on libraries, is that they also provide refuge from extreme heat, in addition to their role in providing education services. Drainage infrastructure will need to cope with higher and faster volumes of water.

Rate-capping constraints are limiting councils' capacity to respond to growing community needs. While council revenue growth is restricted, demand for infrastructure and services continues to increase. As a result, local government is increasingly providing facilities and services that have traditionally been funded or delivered by the State. Partnering with councils to invest in existing local infrastructure provides a cost-effective way for the Victorian Government to deliver community outcomes, leveraging established assets, local knowledge and trusted community relationships rather than creating new infrastructure from scratch.

Our recent building vulnerability assessments have also brought to light that we will need to upgrade ageing buildings to cope with extreme heat and flash flooding. Assets such as roads and drainage are also expected to be impacted by climate risks.

A study carried out by NC Economics estimated that average annual damages to infrastructure in Merri-bek City Council are expected to double by 2050 and triple by 2100.[4] Insurance costs will also continue to increase as climate change is being factored into premiums and insurers are limiting their coverage of significant risks. In many cases insurance for infrastructure and properties may be unavailable entirely, as risks to properties are deemed too high.[5]

Other infrastructure such as transportation, energy, and telecommunications will need to withstand extreme events to continue to enable services, including emergency and essential services that are provided by local councils. Storms in February 2024 caused massive power outages in Victoria and impacted transportation and telecommunications. Timely and effective responses to emergencies rely on resilient infrastructure.

A resilient built environment and infrastructure system relies upon a network of individual resilient assets, requiring place-and context-dependent approaches to individual buildings or building typologies as well as asset classes. A major barrier to strengthening adaptation in infrastructure is the age of existing infrastructure and the costs for upgrades. Merri-bek and

[3] Merri-bek City Council. Ten-year Asset Plan 2022- 2032.

[4] Adaptive Community Assets. 2023. NCEconomics.

[5] Uninsurable Nation: Australia's most climate-vulnerable places. 2022. Climate Council.

other councils have significant property portfolios comprising ageing assets, and often assets which have reached or surpassed their expected end of life.

The Victorian Government should establish a fund to allow local governments and state agencies to proactively upgrade and improve the resilience of infrastructure, rather than just after a disaster. Where assets are impacted by disasters, insurance payouts should account for "building back better" instead of like-for-like replacements that are untenable. Betterment funds, such as those in Queensland and New South Wales, should also be made available in Victoria. Councils should also be supported with resources to effectively assess and determine appropriate adaptation actions and the cost-effectiveness of such actions, to understand the extent of refits or redevelopments required and plan appropriately in budgets and asset planning.

Climate risk should become a core consideration in State infrastructure investment, business case development and asset management guidance, ensuring resilience is designed into infrastructure rather than retrofitted after climate impacts occur. This will reduce future liabilities and deliver better long-term value for public investment.

Improving climate resilience in planning

There is a disconnect between high level policy positions on tackling climate change, and day-to-day planning decisions. Well-designed, adaptive and climate-resilient housing is essential to mitigate climate risks, reduce emissions and ensure long-term liveability for Victorian households. Sustainable design plays a key role in minimising the carbon footprint of development, reducing household costs and safeguarding residents from increasing climate-related hazards. Despite work by councils to make the planning system a better tool for change, the system is not yet doing enough to help restore a safe climate and create resilient communities.

The draft Action Plan recognises the importance of climate-resilient buildings, however this intent is not yet reflected in recent planning reforms. The removal of local Environmentally Sustainable Design (ESD) policy provisions has reduced the ability of councils to require measures that improve thermal comfort, passive cooling, natural ventilation and resilience to extreme heat.

Merri-bek City Council and many other councils across Victoria have been applying environmental building standards to new buildings approved via the planning system since 2015. Merri-bek's ESD planning policy was introduced into the Merri-bek Planning Scheme in November 2015. Since its introduction, the policy has helped reduce energy bills for residents and improve the climate resilience of their homes.

On 21 July 2022, 24 Victorian councils, including Merri-bek and led by the Council Alliance for a Sustainable Built Environment (CASBE) jointly lodged the "Elevating ESD Targets" Planning Scheme amendment seeking to introduce stronger, measurable sustainability standards for new buildings. Four years after lodgement, the 24 councils are still awaiting a response from the Victorian Government.

For more than a decade, Merri-bek Council, together with CASBE and its member councils, has led the implementation of planning policies that improve the environmental performance of new development and reflect contemporary industry best practice. These policies have become an established part of the planning framework and development industry practice

across 29 councils, representing approximately 71 per cent of Victoria's population and 67 per cent of planning activity—almost 4.9 million people. They have helped establish a higher baseline for sustainable development outcomes across Victoria and driven innovation in building design, construction and operational performance.

The recent changes to Clauses 55 and 57 represent a step backwards by removing consideration of local ESD policies for many townhouse and low-rise housing developments. Previous requirements, such as shading for east and west windows, adequate natural ventilation, high reflectance surface colours and insulation have been removed with the intent of streamlining planning processes and addressing housing affordability. Planning policy settings should be reinstated and improved to ensure sustainability outcomes are returned to the standard previously achieved through local ESD policies and established industry practice.

The Action Plan provides an important opportunity to not only drive the restoration of these lost outcomes, but to push for further improvements in sustainability and climate resilience of buildings. The Action Plan should include actions that strengthen planning policy, support innovation in the built environment, and progressively lift sustainability standards to reflect current best practice and community expectations. This would help ensure future housing:

- Achieves net zero carbon outcomes;
- Reduces household energy and water costs;
- Delivers healthier and more comfortable homes;
- Improves water efficiency and stormwater management;
- Protects and enhances urban greening and biodiversity; and
- Are better equipped to respond to current and future climate risks.

Support community resilience through trusted local engagement

Merri-bek supports Action 2 in the draft Action Plan to improve climate risk and emergency management information so households, communities and industry better understand climate risks and resilience. However, providing information alone is not sufficient. Communities are far more likely to understand, trust and act on climate adaptation information when it is delivered through trusted local relationships, culturally responsive engagement and ongoing community partnerships.

Merri-bek is one of Victoria's most culturally diverse municipalities, requiring approaches that go beyond one-way communication. Effective adaptation relies on engaging multicultural and underrepresented communities in ways that recognise local knowledge, build trust and support practical action.

To explore this approach, Merri-bek delivered a two-year Place-based Sustainability Community Outreach Pilot in Fawkner. The pilot developed a community dialogue model focused on climate resilience and long-term behaviour change through:

- A dedicated community outreach function;
- Regular participation in existing multicultural community group meetings;

- Community workshops and information sessions featuring local community members; and
- A network of 30 community ambassadors representing a wide range of cultural backgrounds and community languages.

The pilot demonstrated the value of place-based engagement. By the end of the program, 91 per cent of community ambassadors reported feeling confident discussing climate resilience with others in their community, while participants' reported understanding of climate resilience increased from 5 per cent at the beginning of the program to 91 per cent by its completion.

This experience demonstrates that community-led, place-based engagement can achieve levels of trust, participation and behaviour change that centralised information campaigns alone are unlikely to deliver. The Victorian Government should complement statewide guidance with sustained investment in community-led, place-based adaptation that enables local governments, community organisations and trusted local partners to build climate resilience in ways that respond to local needs and build long-term community resilience.

Recommendations:

5. Set up a fund to allow local governments to proactively upgrade and improve the resilience of infrastructure such as neighbourhood houses, libraries, and maternal and child health facilities that are vulnerable to climate change and that are used by the most at-risk groups.
6. Provide a decision on the Elevating ESD Targets Amendment C223 that allows it to proceed to preparation and exhibition, where it can be tested through public and stakeholder feedback.
7. Engage with Victorian Councils to introduce stronger climate resilient design standards for all buildings to create homes that are healthy, comfortable and affordable to live in, now and in the future.
8. Provide funding and support place-based community preparedness and engagement activities designed to meet the needs of different demographics.

2. 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.

Action 2 and Action 3 in the draft Action Plan both commit to guidance, planning tools and improved asset management, but neither commits to funding the physical changes needed to make schools and early childhood services climate resilient. It remains unclear whether the Action Plan will fund retrofitting of school buildings, or the planting, irrigation and maintenance of vegetation needed to cool school grounds. Without this investment, the "enabling" actions risk becoming administrative exercises that do not translate into safer, cooler learning environments.

School building stock across the state is mixed, and a significant proportion of the school building stock comprises portable classrooms, which are poorly insulated and energy-

inefficient in extreme heat. Capital works programs can also work against cooling objectives: one Merri-bek school reported a net loss of tree canopy shade because of its capital works program, removing existing cooling infrastructure without replacing it.

This is not an abstract risk. Through research we are conducting with RMIT University in the project Toward Heat Resilient Families in Northern Melbourne / Narrm, a parent described feeling that her children were safer at home than at school during extreme heat — a perception that is contributing directly to school absenteeism. This suggests some families are already responding to heat risk in ways that undermine learning continuity, regardless of what the Action Plan intends.

Artificial turf, concrete, unirrigated open space and asphalt car parks within school grounds are generating localised heat islands that pose a direct safety risk to children. Our analysis of urban heat mapping in Merri-bek shows that heat traps are not confined to activity centres and industrial land, as is often assumed. A number of primary schools are recording high surface temperatures, driven in part by the large areas of unirrigated open space typical of state-owned primary school sites.

In response, Merri-bek Council is piloting *Tree for Me*, a program partnering with local schools to increase tree planting on school sites. Programs like this demonstrate what is possible at a local level, but councils cannot resource the scale of retrofitting and greening needed across the state's school stock on their own. Greening in primary schools also represents an opportunity. Because schools have available open space and land area, denser planting or planting of large trees can contribute to cooling the local environment. With appropriate investment, school grounds can be transformed from heat sinks into cooler, greener community spaces, especially in the most heat vulnerable neighbourhoods.

We are calling on the Victorian Government to commit dedicated statewide capital investment — in both government and non-government schools — to retrofit school buildings and early childhood facilities and green school grounds, so that all children have access to cool, safe learning environments during extreme heat.

Recommendations:

9. Commit dedicated statewide capital investment — in both government and non-government schools — to retrofit school buildings and early childhood facilities and green school grounds, so that all children have access to cool, safe learning environments during extreme heat.
10. Invest in opportunities for young people to participate in climate action.

3. 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.

Lack of support for energy upgrades for vulnerable households

We support Action 1 in the draft Action Plan to improve the energy resilience of existing homes to protect those most vulnerable to extreme heat. With the average Australian home

performing at 1.7 stars[6], there are enormous risks to residents living in poor-quality housing during the extreme heat events we are currently experiencing, and which will increase in frequency and intensity. Many households are also experiencing significant cost of living pressures, which is a barrier to households undertaking energy upgrades of their homes. Merri-bek welcomes the inclusion in the draft Action Plan the continuation of the *Energy Efficiency in Social Housing Program*, however there is limited support for residents in private housing who cannot access upgrades through the Victorian Energy Upgrades or Solar Victoria programs.

Since late 2020, Merri-bek demonstrates that scalable adaptation is already possible, providing a "one-stop-shop" concierge service for low-income households to either install a solar PV system or improve the thermal performance of their home with insulation and/or draught sealing measures. The success of the program comes from careful, yet deliberate program design which includes:

- A personalised concierge service - provided by Council staff to support the household throughout the various program stages, including eligibility, suitability of program offerings, right through to completion;
- A foundation of trust-established through Council's relationship with households, the use of experienced and vetted providers, and Council's ongoing commitment to the community;
- Targeted engagement and promotional activities- including utilising Merri-bek's innovative "Sustainability Outreach program", personalised letters from the Mayor, showcasing local stories, and translation services;
- Dedicated assistance - in navigating the sometimes complex process of applying for Victorian Government rebates; and
- Financial subsidies - provided by Council (up to $3,000 for solar or $2,000 for thermal) to address the up-front cost challenges.

We have helped over 385 low-income households to save money on their energy bills and stay safe during climate extremes. Through the subsidised home insulation or rooftop solar, these households are collectively saving around $216,000 a year on their energy bills and lifetime savings of $3.7 million.

Merri-bek has invested in the pilot to show the health and bill savings benefits to residents and develop models that can be scaled. We are concerned that there are limited state and federal government programs and funding currently reaching those who need the most support and are at most risk. An estimated 2.5 million low-income Australian households require energy upgrades in the next 10 - 15 years to become zero-carbon and healthy homes. This represents potential household savings of up to $49 million per annum. A multilevel governance approach is needed to implement energy upgrades programs that leverage the respective capabilities and resources of each sphere of government.

We support the Victorian Greenhouse Alliances and Australian Council of Social Services (ACOSS) advocacy for federal funding, and a strategic partnership between the Victorian

[6] COAG Energy Council (2019) Report for Achieving Low Energy Existing Homes.

Government and local councils to establish a scalable home energy upgrade program. *The* *Repowering Australian Homes with Local Government program* would fill the current gap by providing tailored education and community outreach, connection between households and vetted suppliers, sustainable property linked finance, targeted subsidies, all under the guidance of trusted local councils.[7]

Continue to improve the new minimum energy efficiency standards for renters

Merri-bek applauds the Victorian Government for the introduction of the new Minimum Energy Efficiency Standards for rental homes to be phased in from March 2027. Merri-bek has a high proportion of renters with 34.7 per cent of households living in private rentals. Renters face significant disadvantage in improving the energy performance of their homes and are at higher risk to the impact of climate change.

While the new standards will help improve the energy efficiency of rented homes, to ensure minimum standards regulation is effective there needs to be proper enforcement of compliance. Compliance cannot be a responsibility of renters as many are hesitant to assert their rights for fear of eviction or rental increase, especially during an affordable rental housing crisis.

The exemptions for apartment rental providers where it is not be practical to install an energy efficient heater - because of owners corporation rules, or costs, also need to be addressed. There is a need for consultation with apartment rental providers and strata sector representatives to investigate mechanisms to effectively and fairly overcome any barriers and publicise the solutions. The Rental Minimum Standards should be progressively updated to reduce exemptions. Otherwise, apartment renters will continue to be at a huge disadvantage.

Recommendations:

11. Support the Victorian Greenhouse Alliances advocacy for federal funding, and a strategic partnership between the Victorian Government and local government to establish a scalable home energy upgrade program, that provides tailored education and community outreach, connection between households and vetted suppliers, sustainable property linked finance, targeted subsidies, all under the guidance of trusted local councils.
12. Progressively strengthen the Rental Minimum Standards to reduce exemptions and ensure all rental homes provide healthy, climate-resilient living conditions.

4. Health and human services: the services and assets primarily engaged in protecting human health from disease resulting from or associated with communicable disease, food, water or the environment; and the services and assets which provide human physical and mental health care, social support and assistance.

[7] ACOSS, Proposal to accelerate and scale sustainable and trusted Home Energy Upgrades, prioritising low income housing

We welcome the inclusion of Action 2 and Action 7 in the draft Action Plan and support the Victorian Government's commitment to strengthening the evidence base underpinning climate and health adaptation. Both actions correctly identify data, surveillance and evidence as foundational to good decision-making. However, as currently drafted, both actions describe an intent rather than a program of work. Neither specifies:

- What data will be collected, by whom, and at what frequency;
- What surveillance infrastructure will be built or expanded, and which hazards it will cover;
- How disparate datasets will be integrated across agencies (health, housing, emergency management, environment);
- What platforms will be used to communicate findings to decision-makers, service providers and the public; and
- What decisions this information system will support.

Without this detail, Actions 2 and 7 risk being unfunded, unmeasurable commitments that are difficult to hold government accountable for by 2031. We recommend the final Action Plan include the specific commitments set out above, each with a nominated lead agency, a delivery milestone, and a public reporting mechanism. This is very much needed. Experience during the 2026 European heatwaves demonstrated the value of reporting excess deaths in near-real time. This allows emergency responders, health services and governments to understand the severity and human impacts of an event while it is occurring, including impacts that continue after the heatwave has ended.

We welcome Action 8 in its commitment to improve climate risk assessment of the social housing portfolio. More than half of the portfolio is more than 50 years old, and many residents have multiple vulnerabilities relating to age, health and disability. Further to Homes Victoria's "people first" commitments, asset management data and strategic assessments, including climate risk assessment, should be shared with residents, other relevant health and community service providers and local governments to facilitate the best health and wellbeing outcomes.

The *Energy Efficiency in Social Housing Program* under Action 9 is welcome but should be demonstrably integrated into a comprehensive renovation/retrofit program which will maximise resident wellbeing outcomes through efficient, co-ordinated one-time upgrades of older homes.

We welcome the ongoing commitment under Action 10 to embed climate resilience in new social housing. However, the high sustainability standards achieved through a 5 Star Green Star rating of 1,827 new homes represents only 16 per cent of the 11,501 homes completed under the Big Housing Build. All social housing residents deserve homes that deliver excellent sustainability and there should be a commitment to deliver 5 Star Green Star on its pipeline of Big Housing Build, Social Housing Accelerator and Housing Australia Future Fund projects.

Recommendations:

13. Specify the data and information system that will support climate and health adaptation.
14. Ensure climate risk assessment and other housing portfolio asset assessments are shared with residents and community stakeholders.
15. Integrate energy efficiency programs with a comprehensive renovation and retrofit approach to existing social housing renewal, with a focus on avoiding or minimising resident relocation..
16. Require all new Homes Victoria social housing to meet minimum climate resilience and sustainability standards, supported by updated design guidelines.

5. Natural environment: land-based ecosystems such as grasslands and forests; aquatic ecosystems such as rivers, estuaries and wetlands; and coastal and marine ecosystems such as mangroves and sea-grass meadows.

Council welcomes the four actions outlined in the draft Action Plan. However, the Plan includes no investment program. Capacity-building and knowledge-sharing without a funding pathway risk limited action in the face of urgent climate risks.

Council has identified the need for greater investment in nature, particularly in priority corridors and parklands identified through initiatives such as the Chain of Ponds Moonee Ponds Creek Plan, Fawkner Merri Creek Parklands Plan and Westbreen Creek Conservation Plan

Investment in increasing the urban tree canopy is also critical for a greener and healthier Melbourne as population and housing growth result in tree removals and lost opportunities for planting. The Victorian Government should undertake greening of public land it owns such as road reserves, schools, and other opportunities for greening.

To maximise tree canopy, Council also reiterates its call to reduce the minimum clearance space for uninsulated low-voltage lines in Low Bushfire Risk Areas (LBRA) from 1000 mm to 300 mm[8]. This would reduce unnecessary canopy loss, improve long-term tree structure and stability, reduce repeat pruning cycles and associated costs, and maintain appropriate safety outcomes in low-risk environments.

Recommendations:

17. Commit dedicated investment in open space, tree canopy, nature, and waterway improvements and restoration to support ecosystem services such as cooling and shade, soil stabilisation, and flood mitigation, including funding accessible to councils and community groups
18. Reduce the minimum clearance space for uninsulated low-voltage lines in Low Bushfire Risk Areas (LBRA) from 1000 mm to 300 mm.

[8] Victorian Department of Energy, Environment and Climate Action's Proposed Electricity Safety (Electric Line Clearance) Regulations 2026 (PDF 314Kb) - February 2026

6. Primary Production Action Plan

Merri-bek City Council has not provided specific comments on the Primary Production Action Plan.

7. Transport: infrastructure, services, and operations that enable the movement of people and goods.

Merri-bek City Council welcomes the Victorian Government's proposed action to embed climate risk management into procurement, delivery and asset management, to minimise the exposure of transport infrastructure to heat, flooding and other extreme weather events. This is a critical step to ensure transport systems remain functional during and after extreme events, including maintaining access for emergency services, health care, and other essential services that communities depend on when they are most vulnerable.

Merri-bek is currently developing a Sustainable Infrastructure Policy to ensure our own infrastructure investments are resilient and sustainable into the future. In doing this work, one of the clearest gaps we have encountered is the absence of consistent standards and specifications for climate-resilient assets. There would be benefit from having clear statewide guidance on how asset design, materials selection, site preparation, construction and maintenance should differ from business-as-usual practice to build assets that can withstand a changing climate. Without this, councils are developing individual resilience approaches, leading to inconsistent outcomes.

Infrastructure Victoria's *Weathering the Storm: Adapting Victoria's Infrastructure to Climate Change* report speaks directly to this gap. The report found that preventative maintenance for roads is the most cost-effective way to protect them from flooding, with modelling showing every additional dollar spent on clearing roadside drains and vegetation returning $5.88 and reducing the risk of landslides after bushfires. It also found that in high-risk locations, technologies such as foamed bitumen stabilisation can return nearly $3 for every $1 spent, preventing at-risk roads from being washed away by floods. More broadly, the report notes that extreme weather damage already costs Victoria about $2.7 billion a year, and that these costs will continue to grow without action, while investing early to better protect infrastructure can keep Victorians safer, reduce disruption for people and businesses, and reduce disaster recovery costs. This evidence base makes a compelling economic, as well as social, case for the Victorian Government to act. We call on the Victorian Government to implement the report's recommendations in full, including those directed at asset management practice, technical guidance and capability building across government and local government.

We also strongly support programs that deliver cooler streets and transport corridors as part of the adaptation response. Heat is a growing risk to both infrastructure and people who walk, cycle and wait for public transport on our streets, particularly in growth areas and established suburbs with limited tree canopy. Investment in cooler transport corridors — through increased tree canopy, permeable and light-coloured surfaces, and shade infrastructure at public transport stops — should be treated as core adaptation infrastructure, not an optional add-on. These measures also directly support the Government's broader

active transport and mode-shift objectives, since people are far more likely to walk or cycle on corridors that are cool, shaded and comfortable, particularly during summer.

Recommendations:

19. Release climate change guidance on assessing climate vulnerability and risk, designing for resilience, and adopting preventative maintenance, consistent with Infrastructure Victoria's recommendation, so that all transport asset owners — including local government — are working from a consistent, evidence-based approach to risk assessment.
20. Develop and publish guidance, standards, specifications and technical notes for climate-resilient and sustainable roads, bridges and civil infrastructure assets, including worked examples and case studies of how these have been successfully delivered in Victoria, to close the current gap between the aspiration for resilient infrastructure and the practical, on-ground guidance needed to deliver it.
21. Design and roll out a capability-building program for transport asset managers, including local government staff, to build the skills and confidence needed to assess climate risk, apply resilience standards, and prioritise preventative maintenance across the transport network.
22. Invest in cooler transport networks, including tree canopy, shade and heat-resilient materials along key transport corridors and at public transport infrastructure, to protect both the infrastructure itself and the growing number of Victorians walking, cycling and using public transport as the urban population increases.
23. Attach dedicated funding to the implementation of adaptation actions, so that resilience measures identified through climate risk assessments and business cases are reliably funded and delivered, rather than competing unsuccessfully against other capital priorities.

8. Water cycle: water supply, sewerage, drainage and flood management services.

Increasing guidance and funding for local government on drainage system infrastructure and water sensitive urban design assets

Merri-bek supports the inclusion of water supply, sewerage, drainage and flood management services within the draft Action Plan. These systems are critical to community safety, urban cooling, public health, biodiversity, open space resilience and climate adaptation. The draft plan recognises that the water cycle system includes drainage and flood management, and that local government has a key role in managing place-based infrastructure and emergency recovery.

Merri-bek is a city bounded by waterways and has the goal to transition to a water sensitive city through our Integrated Water Management Strategy 2040. Water is an important

resource and has great cultural significance to First Nations peoples, and adaptation planning must support Traditional Owner self-determination and care for Country.[9] [10]

However, local government has limited funding and resources to deliver the scale of adaptation required. Dedicated state guidance, investment and coordination are needed to help councils to meet water-sensitive city targets, support upgrade to drainage infrastructure, manage increasing flood risks, improve waterway health and enable urban greening.

The final action plan should strengthen Action 2 by moving beyond updated guidance alone. Councils require funding, technical support and capability-building to plan, assess, upgrade and maintain local drainage infrastructure, water sensitive urban design assets and flood-resilient public infrastructure. Guidance should be supported by consistent flood risk data, clear roles and stronger coordination between Victorian Government, water authorities and councils.

The final action plan should also strengthen Action 3 by ensuring innovation translates into practical, place-based delivery. Innovation should not remain limited to research, skills development and sector partnerships; it should support funded local projects that increase stormwater harvesting, recycled water use, passive irrigation, nature-based flood mitigation, urban greening and circular water outcomes. This is particularly important for highly urbanised municipalities such as Merri-bek, where drainage capacity, stormwater management, urban heat, open space resilience and waterway health are intricately connected.

The final action plan should also build on the stronger implementation focus of the previous Water Cycle Adaptation Action Plan, including greater uptake of stormwater and recycled water, co-investment in water infrastructure, fit-for-purpose flood risk data and integration of climate adaptation into integrated water management planning.

Recommendations:

24. Fund upgrades and renewal of drainage networks and increase the number of water sensitive urban design assets.
25. Strengthen Action 2 by providing funding, technical guidance and capability building across local governments to deliver climate-resilient drainage infrastructure, floodplain management, water sensitive urban design and flood-resilient public infrastructure, including support for consistent decision making related to planning permits and floodplain management.
26. Strengthen Action 3 by funding practical local innovation projects, including stormwater harvesting, recycled water, passive irrigation, nature-based flood mitigation, urban greening and circular water outcomes, in partnership with researchers, Traditional Owners, water authorities and councils.

[9] Dja Dja Wurrung Climate Change Strategy 2023 – 2034.

[10] Wurundjeri Water Policy. Nhanbu narrun ba ngargunin twarn Birrarung – Ancient Spirit and Lore of the Yarra.

27.	Strengthen coordination between Victorian Government, water authorities and councils to ensure local adaptation priorities are reflected in regional and statewide water cycle planning, investment and delivery.

Conclusion

The draft Adaptation Action Plans provide a strong foundation. The next challenge is implementation. By providing sustained investment, embedding climate risk into government planning, investment and decision-making, and strengthening partnerships with local government and communities, Victoria can deliver practical adaptation outcomes that reduce risk and build resilient communities.

We look forward to working with the Victorian Government in the implementation of the action plans to create an equitable and climate resilient Victoria.

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