

28th April 2025

Infrastructure Victoria
Level 33, 140 William Street
Melbourne 3000

Submitted online: <https://engage.vic.gov.au/>

Dear Infrastructure Victoria,

Re: Victoria's Draft 30 Year Infrastructure Strategy

On behalf of our members, the Victorian Greenhouse Alliances (VGAs) and the Council Alliance for a Sustainable Built Environment (CASBE) are pleased to provide this response to Victoria's draft 30-year Infrastructure Strategy.

The VGAs are formal partnerships of local governments and statutory agencies driving climate change action across Victoria. We deliver regional mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual members. Our project work is complemented by targeted advocacy, capacity building and regional partnerships. CASBE is an association of Victorian councils committed to ensuring future generations can enjoy a sustainable built environment. CASBE supports a collaborative local government effort to improve sustainability outcomes in the built environment through planning.

With infrastructure both heavily contributing to Victoria's emissions profile, and also vulnerable to the increasing impacts from climate change, we believe this to be an important Strategy intersecting with the work of the Victorian Greenhouse Alliance's and CASBE. The draft Strategy provides practical recommendations for meeting Victoria's emissions reductions and climate resilience requirements, such as supporting energy transition projects, improving resilience against flooding, and supporting sustainable transport. However, we believe there are some areas where the Strategy and recommendations could be strengthened.

Our submission focuses on the Strategy's recommendations around infrastructure emissions, energy, climate resilience, land use and planning, transport, waste and circular economy, and their relation to climate change.

Infrastructure emissions

We support **Draft Recommendation 24** to reduce greenhouse gas emissions from infrastructure. However, it should be strengthened by setting targets and articulating clearer pathways for reducing emissions from both government infrastructure and the sector more broadly. Given the high percentage of emissions from infrastructure, this would serve to set a strong policy ambition and signal in context to Victoria's overarching emissions targets.



The draft Strategy recognises that Government procurement practices need to be updated to increase the adoption of low-carbon materials, and we support the recommendations for work to be undertaken to prioritise and value emissions within procurement guidelines and specifications. However, we believe the Strategy is also a clear opportunity to introduce specific targets and timelines for the adoption of low-carbon materials within government procurement, similar to requirements around recycled content in government infrastructure. Government specifications should include selection criteria with a high weighting for low-emissions infrastructure.

We strongly support a national approach to the collection, measurement and reporting of embodied carbon in materials. This should utilise the [NABERS Embodied Carbon rating tool](#) and build upon this to cover other types of infrastructure. While this Strategy is focused on measuring and reporting on future infrastructure developments, an assessment of the embodied emissions in existing state infrastructure should also be undertaken in order to provide a baseline.

This strategy should also highlight in more detail the available opportunities for reducing emissions across a range of infrastructure such as roads and buildings, utilising existing specification guides such as those created by the [Materials and Embodied Carbon Leaders Alliance](#).

VGA and CASBE Recommendation 1: Set emissions reduction targets and articulate clearer pathways for reducing emissions from the infrastructure sector, and expand existing embodied carbon rating tools to other types of infrastructure.

VGA and CASBE Recommendation 2: Set phased procurement targets and specifications for low-emissions materials within government infrastructure.

Energy infrastructure and emissions

We support **Draft Recommendation 29** prioritising the coordinated and fast-tracked delivery of key energy projects and enabling infrastructure. We recognise the need to fast-track critical energy infrastructure projects to secure a clean, reliable and resilient energy system for Victoria now and into the future. However, it is essential that fast-tracking energy projects and EIS processes does not come at the expense of early, open, honest and meaningful community engagement in this transition.

In relation to site selection and environmental impacts addressed in Recommendation 30, it is critical that local councils and communities are engaged in the process of helping energy proponents to select good sites, and are adequately resourced and supported to do so. Local knowledge of environmentally, culturally and economically significant locations is critical in these processes, and for communities to feel that their priorities and concerns have been considered in decision making. Engagement around energy infrastructure across Victoria has been problematic to date, and needs to improve to align with best practice, such as recommendations from [The Energy Charter](#).

We support **Draft Recommendation 33** and the development of regional energy plans guiding the transition from gas. We recommend that the plans prioritise, resource and seek to enhance local generation, storage and energy sharing, supported by batteries and VPNs, and strengthened distribution networks.

We strongly support **Draft Recommendation 34** and the Strategy's focus on fast-tracking electrification of residential and commercial buildings and increasing support for low-income households and social housing to ensure an equitable clean energy transition. We support the proposed introduction of mandatory disclosure schemes for energy efficiency and point of lease or sale, and recommend that they integrate multi-climate hazard assessments in future, building on the work of the Resilience Building Council, insurance industry and others.

VGA and CASBE Recommendation 3: Improve engagement to align with best practice, and resource local councils and communities to participate in decision making around energy developments, particularly the site location.

VGA and CASBE Recommendation 4: Integrate multi-climate hazards assessments within the proposed mandatory disclosure schemes for energy efficiency.

Climate Resilience

The increasing risks to Victoria's infrastructure from climate change must be adequately addressed, first through a comprehensive climate change risk assessment, followed by adaptation planning and investment. **Draft Recommendation 28** addressing flood risks aligns with the findings of the Flood Inquiry 2022 and should be supported. However, the Strategy does not include similar measures to improve management of other equally important hazards or a multi-hazard adaptation approach. As the VGAs' have previously [advocated](#), it is essential to have adequate science-based data and support for evidence-based decisions around management of all climate hazards, particularly to inform comprehensive climate change risk assessments and planning.

In relation to the points made in the draft Strategy around using best available data and making decisions on which model to use, we would emphasise that the highest Shared Socioeconomic Pathway (SSP) scenario should be used, and that a greater focus should be on extreme and never before seen events to prepare communities for worst case scenarios.

We strongly support **Draft Recommendation 27** for increased funding for adaptation actions. Lack of Government funding to implement the existing Victorian Adaptation Action Plans (AAPs) has led to a general lack of ability, confidence and willingness by local government and other stakeholders in the AAPs to initiate innovative or any new adaptation projects. Implementing this recommendation, including specific measures such as funding proposals for high-risk assets and promoting nature-based approaches to adaptation, would provide a much-needed boost to local government's own local and regional adaptation initiatives.



While we support **Draft Recommendation 37** for improved government asset management, the Strategy should also include recommendations to facilitate climate resilience of all asset classes, including those not owned by the State. The Victorian Government should adopt a ‘betterment’ approach to improve resilience, rather than ‘like-for-like’ replacement of assets. There should also be recommendations specifically to improve the climate resilience of roads, footpaths and drainage as well as buildings and green infrastructure – critical infrastructure managed by local government.

Draft Recommendation 26 around open space connectivity and improved canopy cover is important for community resilience in a warming climate. The approach to improving green infrastructure should be developed for each region in consultation with local governments, which already have comprehensive data and targets through programs such as *Living Melbourne*, *Cool It* (Central Victoria) and *Naturally Cooler Towns* (North East Victoria).

VGA and CASBE Recommendation 5: Expand the consideration of climate risks beyond flood impacts to ensure a multi-hazard adaptation approach, including resourcing multi-hazard climate risk assessments.

VGA and CASBE Recommendation 6: Adequately resource the investment in adaptation actions and the Adaptation Action Plans, including partnering with councils to improve delivery.

VGA and CASBE Recommendation 7: Ensure climate resilient outcomes for of all asset classes, and adopt a ‘betterment’ approach to asset replacement to improve resilience.

Transport

The transport sector is Victoria’s second biggest source of emissions, and as the energy grid decarbonises, will soon overtake energy as our biggest source of emissions. We welcome the focus on public and active transport in the Strategy. A mode shift away from cars is needed if Victoria is to reach its emissions reduction targets and will deliver a range of health, economic and environmental benefits for communities. Provision of safe, affordable, accessible, fast, and reliable public transport, and active transport infrastructure, is critical to enable this shift.

We support **Draft Recommendations 9, 11 and 12** to increase the provision of public transport in Melbourne and across Victoria. However, the Strategy focuses on metropolitan train lines and should consider extending and running more V/Line train services in and between Victoria’s major regional cities and to/from Melbourne. While the plan recommends more bus and coach services in regional Victoria, higher speed train options are also necessary to support connectivity, workforce development, and access to critical services in regional centres.

We support **Draft Recommendation 15** to build priority cycling corridors in Melbourne and major regional cities, but recommend that the Strategy be strengthened by also identifying investment in safe walking and cycling infrastructure in smaller regional and rural towns. While the economies of scale are smaller, regional and rural communities also deserve the opportunity to

access the many health, economic and environmental benefits of active travel, and reduce their dependence on cars.

We also recommend that this Strategy supports an increase in strategically located electric vehicle (EV) charging infrastructure across the state, including coordination with existing state programs and funding, and identifying any infrastructure gaps. This work should be in collaboration with local government to ensure infrastructure placement is strategic, recognising that while the implementation of EV charging infrastructure isn't universally considered as a local government responsibility, many councils to date have led or supported charging infrastructure in their municipalities.

VGA and CASBE Recommendation 8: Expand the planned delivery of improved public transport and cycling infrastructure beyond urban centres to regional and rural communities.

VGA and CASBE Recommendation 9: Support the expansion of EV charging infrastructure across the state, and engage with local government on strategic locations.

Land-use planning

The strategy includes a number of recommendations to improve planning of developments and housing for climate resilience. We support **Draft Recommendation 7**, and the delivery of more homes located close to public transport and open space, with good access to services. This will reduce transport related emissions and improve liveability in our future communities. However, we strongly recommend that any planning reform that enables the delivery of increased housing supply include environmentally sustainable design requirements. As a minimum, these should be equivalent (as opposed to comparable) to the standard currently required by CASBE member councils using the Built Environment Sustainable Scorecard (BESS) tool to implement the local ESD Policy that many CASBE member councils currently have in their planning scheme. Efforts to increase housing supply must not be at the expense of the delivery of resilient housing. Resilient housing is housing that is built to withstand the increasingly extreme climate events and that also provides safe environments for its occupants.

We note that the *Planning and Environment Act 1987* was amended on 26 March 2025 and now requires consideration of climate change in planning scheme amendments. We expect the relevant planning authority, including the Minister, to publish climate considerations as part of amendment documentation. This practice ensures transparency and accountability. The Minister should not be exempt from this requirement.

We strongly support **Draft Recommendation 28** that the Victorian Government coordinate flood studies and maps for all councils and work with councils to update planning schemes to reflect the most up to date flood information as soon as possible. This is critically important for assessing appropriate stormwater treatment and flow mitigation at a lot scale, and particularly important given the recent changes to Clause 55 in the Victorian Planning Provisions (the new Deemed-to-Comply approach to townhouses and apartments up to 3 stories) which have curtailed the ability



of councils to assess contextual issues such as flooding. The Small Lot Housing Code (SLHC), which applies in metropolitan and regional growth areas is another example where planning reform has had a detrimental impact on stormwater outcomes, due to the cumulative impact of high site coverage and low permeability enabled by this code.

We support transport related **Draft Recommendations 8, 9, 10, 11 and 15**, as strategies that support good planning outcomes for sustainable resilient communities.

We also support **Draft Recommendation 16**, as increased access to open spaces is good for liveable communities and represents a good planning outcome. They also contribute to environmental sustainability by offering green spaces that can help reduce urban heat, improve air quality, and support local biodiversity.

We support **Draft Recommendation 26** and the inclusion of a 30% tree canopy target and shrub cover on public land, noting the following challenges:

- Increased housing density results in smaller lots and higher site coverage, limiting space for large canopy trees on private land.
- Infrastructure in road reserves competes for space allocation and can limit tree planting and growth. Design teams, including engineers and landscape professionals, must ensure appropriate species selection and space allocation during the design stage for long-term survival.

We recognise that nuance is applied to canopy targets depending on scale and location. For example:

- Many councils have developed their own evidence-based canopy targets (e.g. City of Melbourne 40%)
- Plan for Victoria applies a 30% canopy target (public and private land) and recognises that it will rely on different responses in different areas to achieve this. E.g. Planning provisions to encourage tree retention on private land in existing urban areas focus on streets for tree planting in growth areas and programs for tree planting on public land, such as Greening the West.
- The Victorian Planning Authority Precinct Structure Plan Guidelines provide for a 30% canopy target within the public realm and open space (excluding areas dedicated to biodiversity or native vegetation conservation).

Open space will be important to achieve canopy targets. We are of the strong view that private land must also deliver canopy cover and recommend that planning be used as a mechanism to require canopy targets on private land.

We support compact cities, and housing concentrated in well serviced locations. Any infrastructure sector plans, as outlined in Recommendation 35, should:

- Be based on the goal of enabling compact cities,
- Accommodate a transition to a net zero built environment, including embodied carbon,
- Take into account likely impacts from climate change and plan accordingly,
- Involve local government in genuine participation, and
- Be resourced to enable all Victorian councils to forward plan.

We support **Draft Recommendation 25** to integrate water management and use fit for purpose water, including recycled water and stormwater. This will require a multi scale approach, from large scale city interventions, the purpose of this recommendation, down to lot scale initiatives. We note that for some water authorities in regional areas with lower densities, the business case may not always be feasible for recycled water. In these areas, a more targeted approach may be needed. Overall, collaboration across government and agencies (i.e. State and local government, water agencies/corporations and catchment management authorities) will be important in delivery of integrated water management outcomes.

A comprehensive approach to integrated water management will also require demand management and rainwater re-use. These can and have been addressed in planning for many years by CASBE member councils, however when these levers are removed (such as with the recent reform to Clause 55), other legislative review is required. We strongly recommend that the Victorian Government:

- Require rainwater tanks for residential development through the plumbing and building regulations,
- Require greater efficiency for water services (including showers; taps for basin, kitchen sink and laundry trough; toilets (WCs) and urinals) via Victorian variations to the NCC2022/2025 Volume 3 Plumbing Code,
- Work with the Department of Climate Change, Energy, the Environment and Water to increase minimum water standards for appliances as set by the national Water Efficiency Labelling and Standards (WELS) scheme.

VGA and CASBE Recommendation 10: That any planning reform that enables the delivery of increasing housing supply include environmentally sustainable design requirements that as a minimum, are equivalent (as opposed to comparable) to the standard currently required by CASBE member councils using the Built Environment Sustainable Scorecard (BESS) tool to implement the local ESD Policy that many CASBE member councils currently have in their planning scheme.

VGA and CASBE Recommendation 11: That the Minister for Planning must include climate considerations in planning amendment documentation and is not exempt from this requirement.

VGA and CASBE Recommendation 12: That canopy targets are required for all private development, and that targets are set in close consultation with local government for different building types.

VGA and CASBE Recommendation 13: That any infrastructure sector plans, as outlined in Recommendation 35, should:

- Be based on the goal of enabling compact cities,

- Accommodate a transition to a net zero built environment, including embodied carbon,
- Take into account likely impacts from climate change and plan accordingly,
- Involve local government in genuine participation, and
- Be resourced to enable all Victorian councils to forward plan.

VGA and CASBE Recommendation 14: That the Victorian Government:

- Require rainwater tanks for residential development through the plumbing and building regulations,
- Require greater efficiency for water services (including showers; taps for basin, kitchen sink and laundry trough; toilets (WCs) and urinals) via Victorian variations to the NCC2022/2025 Volume 3 Plumbing Code,
- Work with the Department of Climate Change, Energy, the Environment and Water to increase minimum water standards for appliances as set by the national Water Efficiency Labelling and Standards (WELS) scheme.

Waste and circular economy

We support **Draft Recommendation 38**, however it is imperative that the waste hierarchy continue to underpin circular economy and waste management, with avoidance as the first critical element.

As Victoria's emissions-intensive landfills run out of space, the State must urgently address their closure. Cohesion with the *Victorian Recycling Infrastructure Plan* and *Infrastructure Schedules* is critical to ensure statewide and regional priorities remain consistent.

The Infrastructure Strategy should include measures to treat the cause of waste generation, not simply the outcomes. This can help defer or avoid the need for increased waste and recycling infrastructure.

In selecting the type of waste and recycling facilities and finding suitable locations for them, significant decisions continue to be paramount. Not the least – CO₂e impacts and community input.

Biochar facilities are an example of carbon drawdown through waste management, and councils such as Yarra Ranges City Council have prioritised this infrastructure and invested in a [Biochar Facility](#).

Different types of waste/resource recovery processing and treatment facilities require different infrastructure. Traditionally when considering Victorian waste and resource recovery facility options, insufficient consideration has been given to the greenhouse gas emissions generated by the facility once it is in operation. These are critical considerations to include and should create the basis for proceeding with planning any potential waste/resource recovery infrastructure, with carbon negative or low greenhouse gas emissions facilities becoming a priority for infrastructure investment. The technology types with higher greenhouse gas emissions for processing the



specific waste/resource material, would thus become ineligible until they met a stricter infrastructure standard.

It is imperative that significant and close consultation occur regarding facility type, technology used (both of which directly affect the infrastructure development), location and impacts. This engagement is likely to be required early in the case of potential pyrolysis or other burning – as councils and communities often hold strong views on these technology treatments.

Under *Recycling Victoria: A new economy*, local government is required to introduce the four-bin kerbside system, which provides the feedstock of municipal resources for waste/resource recovery infrastructure, once developed. Without State Government support, the establishment of a robust and ongoing circular economy related to resources such as green/food waste (FOGO) will continue to falter. Increased glass reprocessing facilities are also needed as separate glass collection under the four bin system results in a cleaner product, with less fines and improved reprocessing capacity. Infrastructure is critically required to address this material.

The focus on e-waste, including batteries, solar panels and wind turbines is supported by Victorian Greenhouse Alliances. While e-waste product stewardship has been available for some years now, it still remains voluntary and does not meet capacity needs. State Government has the opportunity to show leadership on Product Stewardship where there is a national leadership gap.

This is important as it will have a direct impact on our need to develop product stewardship scheme infrastructure and our ability to support a circular economy outcome.

The Infrastructure Strategy should also include stronger partnership development and advocacy to the Australian Government on Product Stewardship. This will impact on the development of Victorian supporting infrastructure for Product Stewardship.

China's National Sword, USA's recent tariffs on goods, India's reluctance to receive international waste and other global issues all show that Australia must become self-reliant on waste and resource recovery management. The development of a circular economy will complement this. However, with the slow uptake of this, State and National intervention and subsidies in these related markets continues to be likely to be needed.

VGA and CASBE Recommendation 15: That Draft Infrastructure Strategy update include:

- Avoidance as the first critical underpinning of a circular economy
- Identification of ways to avoid or defer the need for costly infrastructure development where possible
- Requirement that the Victorian Government work with the Australian Government to decrease waste materials entering Australia
- Recognition of the roles of the Victorian Recycling Infrastructure Plan and Recycling Victoria and clarification of responsibilities.



VGA and CASBE Recommendation 16:

- Greenhouse gas emissions generated by potential facilities once they are in operation must be paramount in the environmental considerations for any potential waste/recycling/resource recovery infrastructure development.
- Higher priority for infrastructure development should be given to waste technologies that are carbon negative or low emissions in their construction and operation. This low-emissions approach should also be applied for resource recovery such as glass processing and paper recycling.
- Processing technologies such as biochar should be prioritised for increased investigation to support potential, wider uptake.
- A carbon and environmental tool (or similar) should be developed to facilitate this.

VGA and CASBE Recommendation 17: Early and significant consultation must occur with MAV, Local Government and communities who are impacted by waste/resource recovery infrastructure siting and development.

VGA and CASBE Recommendation 18: The Draft Infrastructure Plan update should include measures to ensure circular economy outputs by:

- ensuring adequate FOGO recycling infrastructure facilities are developed for Victoria, working with Recycling Victoria to support the FOGO market from source-separation, to collection, processing and to end product
- State Government procuring FOGO outputs as part of their commitment to a circular economy and improved resource recovery
- Prioritising the development of Victorian infrastructure to process glass.
- Improved support for local government to participate in infrastructure planning, development and use of waste/resource recovery facilities in Victoria.

VGA and CASBE Recommendation 19: That the State Government develop partnerships with and undertake advocacy to the Australian Government:

- To hasten mandatory product stewardship – particularly for TV's, computers and e-waste and other priority products
- For the Australian Government to provide financial support to Victoria in developing appropriate recycling infrastructure to house product stewardship schemes
- To increase the number of Product Stewardship Schemes and expand this to other items that hold valuable resources for circular economy outcomes
- For Victoria's Priority waste products to be included in the Product Stewardship Priority List.



Greenhouse Alliances contacts

- Barwon South-West Climate Alliance (BSWCA), Sue Phillips, Executive Officer, sue.phillips@bswca.org
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 - o Golden Plains Shire
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 - o Warrnambool City Council
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 - o Buloke Shire Council
 - o Central Goldfields Shire Council
 - o Gannawarra Shire Council
 - o Greater Bendigo City Council
 - o Hepburn Shire Council
 - o Loddon Shire Council
 - o Macedon Ranges Shire Council
 - o Mildura Rural City Council
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 - o Knox City Council
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 - o Benalla Rural City Council
 - o Campaspe Shire Council
 - o Greater Shepparton City Council
 - o Indigo Shire Council



- o Mansfield Shire Council
 - o Mitchell Shire Council
 - o Moira Shire Council
 - o Murrindindi Shire Council
 - o Towong Shire Council
 - o Strathbogie Shire Council
 - o Wangaratta Rural City Council
 - o Wodonga City Council
 - o Alpine Resorts Victoria
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 - o Manningham City Council
 - o City of Melbourne
 - o Merri-bek City Council
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 - o Cardinia Shire Council
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- Western Alliance for Greenhouse Action (WAGA) Fran MacDonald, Executive Officer, franm@brimbank.vic.gov.au
 - o Brimbank City Council
 - o Maribyrnong City Council
 - o Hobsons Bay City Council
 - o Melton City Council
 - o Moonee Valley City Council
 - o Moorabool Shire Council
 - o Wyndham City Council

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



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CASBE member councils:

City of Ballarat	Hepburn Shire Council	Mornington Peninsula Shire Council
City of Banyule	Hobsons Bay City Council	Mount Alexander Shire Council
Bass Coast Shire Council	City of Hume	Murrindindi Shire Council
City of Bayside	Indigo Shire Council	City of Port Phillip
City of Boroondara	City of Kingston	City of Stonnington
City of Brimbank	City of Knox	Strathbogie Shire Council
Cardinia Shire Council	City of Manningham	Surf Coast Shire Council
City of Casey	City of Maribyrnong	City of Warrnambool
City of Darebin	City of Maroondah	City of Whitehorse
East Gippsland Shire Council	City of Melbourne	City of Whittlesea
City of Frankston	City of Melton	City of Wodonga
City of Glen Eira	City of Merri-bek	City of Wyndham
City of Greater Bendigo	Mitchell Shire Council	City of Yarra
City of Greater Dandenong	City of Monash	Yarra Ranges Council
City of Greater Geelong	City of Moonee Valley	

