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**From:** Charles Casuscelli  
**Sent:** Friday, 31 May 2024 1:59 PM  
**To:** Portfolio Committee 7  
**Cc:** Kelly Gee  
**Subject:** Inquiry into the planning system and the impacts of climate change on the environment and communities - Post hearing responses  
**Attachments:** Additional information for the Parliamentary Inquiry\_WSROC signed.pdf

Hi David,

Please accept the attached additional information that;

1. clarifies some of the issues that came up during the hearings and that may have misrepresented Local Government processes, and
2. provides information to the Committee on things that were of interest to it.

Cheers

Charles

Charles Casuscelli RFD | Chief Executive Officer



*Advocating for the people of Western Sydney*

**Western Sydney Regional Organisation of Councils Ltd**

*Nothing has such power to broaden the mind as the ability to investigate systematically and truly all that comes under thy observation in life.*

*Marcus Aurelius*

Dear Committee,

Thankyou again for the opportunity to present evidence to the Parliamentary Inquiry into the ***Planning System and the impacts of climate change on the environment and communities*** at Campbelltown on the 6<sup>th</sup> May 2024.

Following the hearing, WSROC would like to offer the following additional information and clarifications for the Committee’s consideration.

**1. The Committee expressed interest in the number of residential homes that bypass local government planning instruments.**

The below table outlines the percentage of developments approved by the Exempt and Complying Development SEPP per Western Sydney LGA as per data made available on the NSW Planning Portal.

The Exempt and Complying Development SEPP is just one state-led planning pathway that bypasses council planning controls, however it is the dominant pathway determining residential development in Western Sydney’s Growth Areas.

2020/21	
LGA	% of CDCs as a total DA and CDC determined
Blue Mountains City Council	8%
Camden Council	60%
Campbelltown City Council	63%
City of Canterbury-Bankstown	53%
City of Parramatta	58%
Cumberland Council	58%
Fairfield City Council	62%
Liverpool City Council	32%
Penrith City Council	52%
The Hills Shire Council	55%
Wollondilly Shire Council	38%

*\*Note Blacktown and Hawkesbury LGA data was not available for this year on the NSW database.*

**2. The Hon John Ruddick MLC expressed concern that increasing requirements for heat resilience in the planning system may have mal-adaptive effects for cold resilience, particularly for those in cold climates.**

This is an important question, and one that WSROC has explored during the development of its heat resilience assessment for urban development; [Cool Suburbs](#).

The first phase of Cool Suburbs' development focused on understanding urban design measures applicable to Western Sydney climate zone 5. Now in phase two, we are currently in the process of expanding Cool Suburbs to apply across all NSW climate zones, and a key part of this was understanding appropriate measures for cooler climates, including alpine region climate zone 8.

This question was interrogated by a Science Panel comprised of leading experts from CISRO, University of Melbourne, Monash University, UNSW and Western Sydney University. The panel concluded that while heat mitigation measures are not a priority in cool climate zones, the application of such measures would not have negative impacts on thermal performance within that climate zone.

WSROC strongly supports the need for better thermal standards for homes; whether that be for extreme heat or extreme cold. Currently the NSW Planning system does not overtly address either but is well placed to support a nuanced response to the needs of different climate zones through instruments like the Sustainable Buildings SEPP.

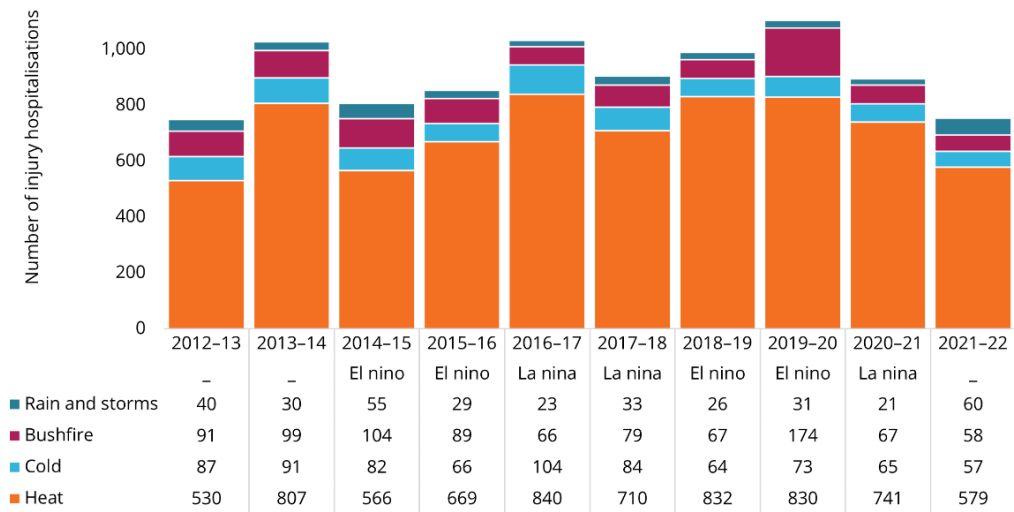
Cool Suburbs NSW is due for release in September 2024.

**3. The Hon John Ruddick MLC expressed concern that heat related deaths receive more attention than extreme cold, and that the latter had been reported as more prevalent in *The Lancet*.**

It has long been assumed that more Australians die from extreme cold than extreme heat. However, this has been disputed in recent years for a range of reasons including lack of standard reporting of heat-related injury, as well as the shift towards more heat exposure and less cold exposure with climate change.

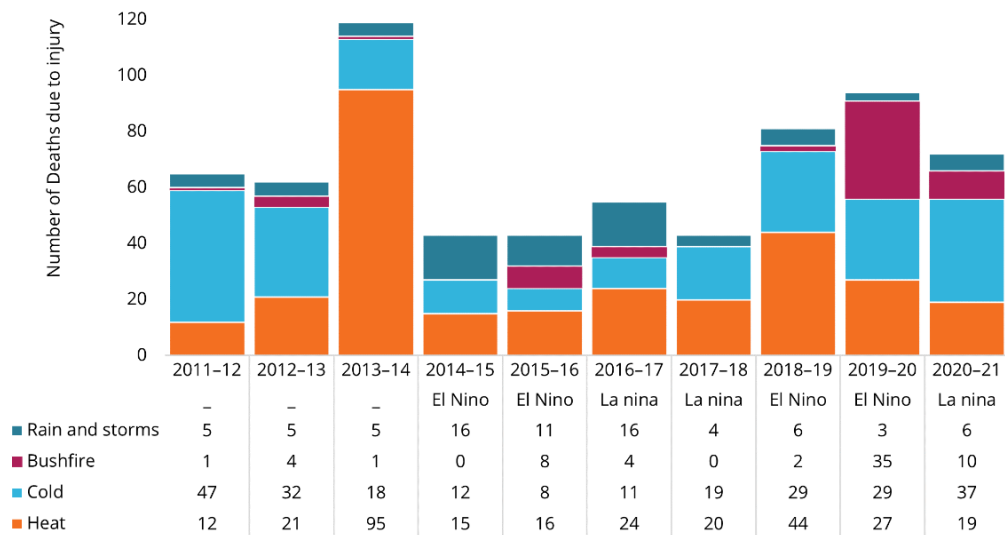
The [Lancet study](#) recently referenced in the Australian media analyses data from the years 1988–2009. Analysis of more recent data (2012 – 2022) by the Australian Institute of Health and Welfare, found that in the last 10 years extreme heat was the leading cause of extreme weather hospitalisation and death, followed closely by extreme cold (Figures 1 and 2). These findings were published a November 2023 report [Let's talk about the weather: Injuries related to extreme weather](#).

**Figure 1: Extreme weather-related injury hospitalisations, 2012-13 to 2021-22**



Source: National Hospital Morbidity Database (NHMD)

**Figure 2: Extreme weather-related injury deaths, 2011-12 to 2020-21**



Source: National Hospital Mortality database (NMD)

Figures 1 and 2 show extreme heat and cold are both important issues with significant impacts on the health of our communities and costs to the NSW health system. This degree of public health risk should be reflected in the NSW planning system, but to date thermal standards reflect energy efficiency rather than human safety. Improving the thermal performance of homes and suburbs through the planning system will deliver beneficial health outcomes in both extreme heat and cold scenarios. However, the trend towards increasing extreme heat deaths means that a climate resilient planning system must ensure heat is well considered today.

4. **The Committee expressed interest in WSROC’s Greater Sydney Heat Taskforce program and the reports and recommendations flowing from that consultation process.**

As discussed, this Disaster Risk Reduction Fund funded project is due for completion in September 2024. An overview of deliverables is provided below for your reference.

**Greater Sydney Heat Taskforce (2023 – 2024)**

The Greater Sydney Heat Taskforce brings together key decision makers from government, industry and the community sector to map a multi-sector approach to heat governance in Greater Sydney. Together, the Taskforce is providing strategic guidance for delivery of four key projects outlined below.

Taskforce members include:

- Australian Department of Climate Change, Energy, Environment and Water
- Australian Red Cross
- Blacktown City Council
- Business Western Sydney
- Committee for Sydney
- Department of Planning, Housing and Infrastructure
- Endeavour Energy
- Green Building Council of Australia
- Liverpool City Council
- NSW Department of Climate Change, Energy, Environment and Water
- NSW EPA
- NSW Health
- NSW Police (SEOCN)
- NSW Reconstruction Authority
- Property Council of Australia
- Resilient Sydney
- Sweltering Cities
- Swiss Re
- Sydney Water
- Transport for NSW
- Western Sydney Community Forum
- WSROC

● **Heat Smart City Plan**

Under the auspices of the Taskforce, WSROC is facilitating the co-design of a 5-year heat resilience plan for Greater Sydney. While details of the plan will not be finalised until September 2024, it will include a set of agreed priorities for building a heat resilient city. **Heat Smart Places** has been confirmed as one of five key ‘directions’ for addressing urban and extreme heat risk. This encompasses issues including urban planning, home design, social and affordable housing.

In addition to Taskforce members, the following organisations have participated in City Plan co-design:

- Australian Institute of Landscape Architects
  - Camden City Council
  - Campbelltown City Council
  - City of Sydney
  - Doctors for the Environment
  - Hawkesbury City Council
  - Homes NSW
  - NEMA
  - Nepean Blue Mountains Local Health District
  - NSW Australian Medical Association
  - NSW Treasury
  - Penrith City Council
  - Peppercorn Services
  - South Western Sydney Local Health District
  - Sydney Alliance
  - Sydney University
  - Sydney Water
  - UNSW
  - Western Sydney Local Health District
  - Western Sydney Parkland Authority
  - Western Sydney University
- **Cool Suburbs NSW**

Phase 2 of WSROC's science-led heat resilience assessment for urban development. Designed with leading researchers, government and industry, Cool Suburbs NSW will apply across all NSW climate zones via an easy-to-use web interface. Phase 1 of Cool Suburbs is available from [coolsuburbs.com.au](https://coolsuburbs.com.au)
  - **Community Heatwave Risk Assessment**

What does a 10 or 100-year heatwave look like today and in future climates?

This project takes a probabilistic approach to heat risk assessment focusing on impacts to human health. Air temperature, humidity, windspeed, urban form, canopy cover, socioeconomics, behaviour and service access are analysed to produce a high-resolution risk assessment tool for use in climate adaptation, urban planning, emergency management and more.
  - **Heatwave Management Guide**

Demands on councils to actively manage heat is growing. This is a new and emerging space with limited guidance and unclear governance. This Guide will provide frameworks, advice and real-world examples on addressing heat in operations, community development, communications and emergency management.

Other heat related projects that are relevant to the Inquiry include:

- [Urban Heat Planning Toolkit \(2021\)](#)

The Urban Heat Planning Toolkit was developed to help local government strengthen their planning provisions to reduce the impacts of heat. Many councils have since used this guide to address heat in their LEP and DCPs. The Toolkit outlines how heat can (and cannot) be addressed through local planning instruments. Recommendations for policy change at state and federal levels are also included where the capacity of local instruments are limited.

- [Future Proofing Residential Development in Western Sydney \(2022\)](#)

This study reviewed the thermal performance of BASIX-compliant Western Sydney homes under future climate scenarios, with the aim of understanding whether today's housing standards are future-ready.

Four housing types (single and double storey, low and high-rise apartments) were modelled under 2020, 2030, 2050 and 2017 heatwave scenarios.

Further modelling was conducted to test how design modifications could allow these homes to perform better in future climates. Findings include:

- BASIX-compliant homes became thermally unsafe when tested in 2020, 2030, 2050 and 2017 heatwave conditions.
- Homes modified to perform well in 2050, failed to meet today's NSW BASIX standards (therefore are not allowed to be built) despite using significantly less energy.
- If we continue designing for historical, colder climate, homes will neither be energy efficient nor heat resilient.

- [Heat Smart Western Sydney \(2022\)](#)

Heat Smart Western Sydney looked at what processes and structures are needed for the city to manage to heatwave emergencies, with a focus on how we can support our most vulnerable. The Heat Smart Western Sydney project had two key components:

1. **Heat Smart Resilience Framework** which outlines 25 recommendations for improving heatwave management. The HSRF was informed by a gap analysis of heatwave management practice including a literature review, interviews, and a community survey. The results were further refined through consultation with over 500 regional stakeholders from across levels of government, industry, academia and community sectors.
2. **Heatwave safety and preparedness resources** for communities and frontline staff. These resources were translated into 10 languages and

piloted with communities and local organisations across the region in a series of workshops run in partnership with councils, health and the Australian Red Cross.

Thankyou again for the time in consideration of our evidence to this Inquiry. We look forward to reading the final report.

Yours Sincerely,

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Charles Casuscelli RFD

CEO