

Submission
No 238

**INQUIRY INTO PLANNING SYSTEM AND THE IMPACTS
OF CLIMATE CHANGE ON THE ENVIRONMENT AND
COMMUNITIES**

Organisation: Western Sydney Leadership Dialogue

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Inquiry into the planning system and the impacts of climate change on the environment and communities

Submission by the Western Sydney Leadership Dialogue

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About the Dialogue

The Western Sydney Leadership Dialogue (the Dialogue) welcomes the opportunity to contribute to the Committee on Planning and Environment's *Inquiry into the planning system and the impacts of climate change on the environment and communities* (the Inquiry).

The Dialogue is fiercely committed to enhancing the future of the Greater Western Sydney (GWS) region and has cultivated an extensive network of Partners from within the community, private, and public sectors who share this goal. The GWS region is home to over half of Greater Sydney's population and functions as the third largest economy in Australia, and the infrastructure, or often the lack thereof, that makes up the region has direct implications for these Partners.

Since its inception, The Dialogue has been advocating for sensible, equitable, and transformative infrastructure for the residents of GWS. The Dialogue has always been a vocal proponent of projects that will provide residents with better opportunities, services, and amenities, and enhance their lives, such as establishing recreational water spaces, developing health and education hubs, and increasing community and social housing.

Introduction

Climate change presents a set of practical problems for everyone, but for those in GWS, solutions are becoming urgent. The impact of climate change is felt more intensely in GWS than in other parts of Sydney, and for people living in the region it is a day-to-day reality. With the urban heat island effect occurring across the rapidly growing suburbs, bushlands on the outer fringes, and major rivers framing the whole region, few Sydneysiders will be harder hit by climbing temperatures, fiercer fires, or rising flood events than GWS residents.

The Dialogue recognises the current significant, chronic housing shortage, compounded by crisis levels of unaffordability. We support the NSW government in setting and realising housing targets to address the housing shortage according to set timelines. We, however, caution against sacrificing liveability, sustainability, health, and resilience for what might appear to be short term gains in supply.

NSW is facing both a housing crisis and a climate crisis. Neither issue can be dealt with in isolation without adversely affecting the other. Without clear, smart planning processes and accurate risk assessment metrics there is a danger of creating a large cohort of GWS residents who are consistently vulnerable to extreme heat, floods, and bushfires, compounding the already increasingly severe day-to-day impacts of climate change.

A note on the TOR's exclusion of references to heat

The Dialogue urges the Committee to include the consideration of the effects of heat in the Inquiry. Heat should be especially considered within the context of urban planning, building standards, population health, connectivity, and the functioning of critical infrastructure.

GWS is disproportionately affected by many examples of the impacts of climate change in comparison to the rest of Sydney. Heat, however, is possibly the most ubiquitous and damaging.

In our increasingly hotter summers, there is a great disparity in the impacts of the heat across Sydney. When compared to the cooler coastal regions, GWS suffers under increasingly unsustainable temperatures. In 2020, Penrith was the hottest place on the planet at 48.9 degrees, and in the middle of summer, its daily maximum temperature is 31.2 degrees in contrast to 27 degrees in the city.¹

Heat also affects people across the socioeconomic spectrum disproportionately. As power prices continue to surge, residents of GWS are increasingly struggling to deal with warmer temperatures. Although housing provides some refuge from the heat, in GWS issues around access to, and funding of cooling infrastructure, can result in it being difficult to keep them running throughout summer, making it increasingly difficult to cope with extreme heat.

With economic inequality, global temperatures, and power prices all exponentially increasing in lockstep, urgent action is needed to prevent the residents of GWS from experiencing a climate emergency.

Summary of recommendations

In relation to the collection & use of local, up-to-date, and modelled climate and natural disaster risk data:

1. Climate and natural hazard modelling and risk planning must include data and consideration for high and extreme heat.
2. Climate and natural hazard modelling and risk planning should include data and consideration of social, physical, and mental health and social infrastructure.
3. The NSW Government should legislate the responsibility of the preparation and maintenance of up-to-date natural hazard modelling.
4. Climate and disaster data and modelling needs to be centralised and accessible to the public.
5. BASIX regulations should be reviewed against the ongoing collection of climate data and modelling and updated at set intervals.

¹ 2020, Bureau of Meteorology *in* Sydney Morning Herald, [The Sydney suburbs that hit 50C last summer](#)

TOR C)

Short, medium, and long term planning reforms that may be necessary to ensure that communities are able to mitigate and adapt to conditions caused by changing environmental and climatic conditions, as well as the community's expectation and need for homes, schools, hospitals, and infrastructure

In relation to the collection & use of local, up-to-date, and modelled climate and natural disaster risk data

Accurate, place-based, and up-to-date climate and natural disaster risk data and modelling must be available and used to ensure that governments, businesses, and community members are able to make future focused planning decisions that account for and attempt to mitigate risks from the impacts of climate change.

1. Climate and natural hazard modelling and risk planning must include data and consideration for high and extreme heat.

The Dialogue would like to highlight that high and extreme heat as a climate change hazard has not been included in the TOR of the Inquiry. Reiterating the point made in WSROC's submission to this inquiry², heat represents a significant hazard to community health, regional liveability, productivity, and the functioning of critical infrastructure.

Western Sydney disproportionately suffers from high and extreme heat in comparison to the north and east of Sydney. As such, not including it as a factor for planning consideration is a significant gap in the development of meaningful and effective policy reform as outlined in the TOR.

2. Climate and natural hazard modelling and risk planning should include data and consideration of social, physical, and mental health and social infrastructure.

The effects of climate change on the community are important to document to monitor the health and wellbeing of residents, as well as assess the impact of, the gaps in, and opportunities for planning policy.

This is especially important when considering heat in Western Sydney, as it is one of the most pervasive consequences of climate change. The measurement of the effect of heat on people can be grouped into two main areas:

- i. The influence of high and extreme heat on everyday decisions that ultimately impact on long term health e.g. whether to walk or drive to a destination.
- ii. Heat kills people. It's important to gain an in-depth understanding of what gaps in social and/or built infrastructure enable this to happen.

Work needs to be done by the NSW Government to identify the appropriate measurements and assign responsibility for data collection, publication, and use.

² 2023, WSROC, Submission to the inquiry into the planning system and...

3. The NSW Government should legislate the responsibility of the preparation and maintenance of up-to-date natural hazard modelling.

There is currently a lack of clear accountability for the preparation and upkeep of the suite of climate and natural disaster data and modelling for planning processes, according to the Planning Institute of Australia³.

The Dialogue supports the City of Sydney's evidence to the inquiry⁴ which highlighted that what data will be collected and by whom should be legislated by the NSW Government. This is to ensure a process that utilises a robust data base and future proofs the planning framework from future departments and/or ministers withdrawing support for the collection of some or all the data.

Future investigation should be done into where the responsibility of this task should lay, however the Dialogue recommends that there be consideration for this to lay with the State Government, for three key reasons:

- i. It is essential that the data collection process and modelling is consistent across the state. Great variation in resourcing and priorities across LGAs means that this will be extremely difficult to achieve if not coordinated and resourced by the NSW Government.
- ii. A large proportion of residential dwelling developments are approved via State Government Complying Development Pathways, rather than through Council's local controls, according to Liverpool Council.⁵ In order to ensure that climate change mitigation and preparation are properly integrated through all planning controls, it's vital that the data collection and use starts from the State Government and filters down.
- iii. Holding data and modelling at a central location at the state level will make access simpler for all parties requiring such.

4. Climate and disaster data and modelling needs to be centralised and accessible to the public.

Data held on local climate trends and extreme weather event occurrences needs to be publicly available, as well as up-to-date and future focused. State and local governments are not the only groups that require this information to make accurate decisions. Local businesses, as well as the current and future residents of local areas would also benefit from this data.

Choosing where to live can be a difficult process, which is made more complex by conflicting and hard to acquire information about the local area and natural disaster related risk. GWS is undergoing strong population growth and will continue to do so for at least the next two decades. While birth rate will make up some of this population growth, a much larger proportion will come from domestic and international migration. As such, there will be large numbers of individuals and families seeking to rent and purchase homes in areas of which they hold little to no local knowledge, including of how they will be impacted by extreme weather events.

As we face increasingly frequent and severe weather events, prospective renters and buyers should not be left with the limited tools that they currently have at their disposal to make an assessment on the safety of their future selves and home, as well as any ongoing costs in terms of insurance, home repairs, and evacuation requirements.

³ 2023, Planning Institute of Australia, [Submission to the inquiry into the planning system and..](#)

⁴ 2024, City of Sydney Council, [Hearing #2, Submission to the inquiry into the planning system and...](#)

⁵ 2023, Liverpool Council, [Submission to the inquiry into the planning system and..](#)

5. BASIX regulations should be reviewed against the ongoing collection of climate data and modelling and updated at set intervals.

The Dialogue recommends that BASIX regulations are reviewed and updated as part of the preparation and maintenance of up-to-date natural hazard modelling by the NSW Government. A recent study published by WSROC found that the current NSW BASIX guidelines are frequently resulting in the delivery of homes that are both energy hungry and thermally unsafe for future expected temperatures.⁶ Ensuring that BASIX regulations are in alignment with the most recent expectations for the future will help to future-proof the built environment.

The Dialogue would like to note, however, that the updating of BASIX guidelines cannot leave the construction and development industry to deal with constantly shifting regulation goalposts. The Government should work with industry to determine appropriate review intervals, so that certainty can be established for all stakeholders.

⁶ 2022, WSROC, Future Proofing Residential Development in Western Sydney