

SUBMISSION ON ENVIRONMENTALLY SUSTAINABLE DEVELOPMENT OF BUILDINGS AND SUBDIVISIONS: A ROADMAP FOR VICTORIA'S PLANNING SYSTEM

Department of Environment, Land, Water and Planning



VICTORIAN CHAPTER

Submission issued March 2021



ENVIRONMENTALLY SUSTAINABLE DEVELOPMENT ROADMAP SUBMISSION



**Australian
Institute of
Architects**

ABOUT THE INSTITUTE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 12,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) to the Victorian Department of Land Environment, Water and Planning. It responds to the invitation for submissions in relation to *Environmentally sustainable development of buildings and subdivisions. A roadmap for Victoria's planning system*.
- At the time of this submission the National/Chapter President is Ms. Alice Hampson FRAIA¹ and the Victorian Chapter President is Mr. Bill Krotiris RAIA
- The Chief Executive Officer is Ms. Julia Cambage and the Victorian State Manager is Mr. Tim Leslie FRAIA.

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1 INTRODUCTION

About us

The Australian Institute of Architects (the Institute) is the peak body for the Architectural profession in Australia, representing around 12,000 members. The Institute works to improve our built environment by promoting quality, responsible, and sustainable design. Architecture influences all aspects of the built environment and brings together the arts, environmental awareness, sciences and technology. By combining creative design with technical knowledge, Architects create the physical environment in which people live, work and learn. Therefore, through its members, the Institute plays a major role in shaping Australia's quality of life.

The context of this submission

The Institute places a high value on our environment and matters impacting it. At a national level, the Institute has a Climate Change and Sustainability Taskforce, and also a Sustainable Architecture Forums at each State /Territories Chapter. In addition, the Australian Institute of Architects is a full member of the Australian Sustainable Built Environment Council (ASBEC).

The Institute has formally adopted and is promoting a policy that the Australian Government establishes a national plan towards zero carbon buildings by 2030.

Our current policy positioning, as articulated in our 2021 Federal Pre-budget submission, strongly promotes better planning to foster thriving cities, urban areas and regions and to enhance liveability, wellbeing, sustainability and productivity.

The Institute therefore welcomes the invitation to make a submission to the Department of Environment Land Water and Planning's Environmentally Sustainable Development Roadmap consultation.

Our submission has been prepared with the input of the Institute's Victorian Chapter Sustainable Architecture Forum.

How we have responded in detail.

This submission first responds directly to two of the Planning Policy Framework Clauses of the Victorian Planning Provisions as they are shown in Appendix I *of the Roadmap*.

It then considers the seven broad reform objectives as summarised on page 12 of the Roadmap alongside the corresponding tables in the section *ESD planning reforms: key areas* as detailed from pages 18 to 27 of the Roadmap. These tables provide "*Analysis of VPP ESD responses under consideration*" which correspond to the seven broad reform objectives.

For reference purposes, and to add clarity, the seven broad reform objectives from page 12 are presented with the corresponding VPP ESD Response from the tables in Appendix I *of this submission*.

2 DETAILED RESPONSE TO THE ISSUES AND QUESTIONS

2.1 Proposed amendments to VPP Clause 15 addition – Environmentally sustainable development .

The Institute supports the proposed addition to VPP Clause 15 as reflecting the broad intent of Environmentally Sustainable Development. We suggest that the second last dot point could be reworded to “Supports human and community health and wellbeing” to emphasise that health and wellbeing are important in equal measure for people individually and for communities as a whole.

2.2 Proposed amendments to VPP Clause 15.01-2S Building design

This overall clause is important as building design is core to the work of Architects. The intent of the additions is supported with the other existing objectives and strategies of this clause.

However, there is a risk that the intent of the VPP as a policy guideline may not be met in its implementation. Good designs can fail to pass a planning approval process delivered by local government authorities when based on checklists of planning criteria, rather than a more wholistic and qualitative appraisal of a design as to whether it does realise the intent of the Victorian Planning Provisions (VPP) Guideline or Standard. Conversely, poor outcomes for our communities may also be realised where planning processes have facilitated some approvals that meet the criteria checklists, however fail to exhibit a wholistic qualitative design outcome.

A remedy to this situation, and one which may avoid costly and delaying determinations at the Victorian Civil and Administrative Tribunal (VCAT), would be the establishment of design review panels. These might provide an effective circuit breaker to the VCAT review process and therefore comprise a cost-effective route to efficient and timely decision making that also ensures the objectives of applicable Victorian Planning Provisions clauses are achieved.

Establishing design review panels would require consideration of a model for their establishment, operation and oversight including:

- legal basis and governance (e.g legislation, performance monitoring, ministerial oversight and policy review)
- business model – direct user pays, funded from development levies or state government output expenditure

- composition and operation, including potential consumer or community representation as well as matter experts from architecture, urban planning, statutory planning and landscape architecture

2.3 Broad reform objectives: Make it easier to recycle.

To support the government's recycling and waste minimisation goals, planning standards for new buildings will be updated to make it easier and more convenient for building occupants to divert materials for reuse or recycling. Refer also to Table: Analysis of VPP ESD responses under consideration – WASTE p.23 of ESD Roadmap document as outlined in second column of Appendix I of this submission.

The Institute supports this broad reform objective.

2.4 Broad reform objectives: Cool new developments and our urban environment.

With a changing climate bringing more frequent hot days, practical landscape and design measures to reduce urban heat impacts will be developed. Refer also to Table: Analysis of VPP ESD responses under consideration for LANDSCAPING AND BIODIVERSITY p.25 and URBAN HEAT p.26 of ESD Roadmap document as outlined in second column of Appendix I of this submission.

The Institute supports this broad reform objective. It is noted that the consultation document has not addressed any details about landscaping here beyond tree canopy. Landscape involves considerably more than just tree canopy and includes earth shaping, water bodies, wetlands, and other non-tree flora or bio-mass. Vegetated area should be adopted as a broad metric for all development types.

2.5 Broad reform objectives: Facilitate active and sustainable transport choices.

To match changing community needs new standards will provide for adequate bicycle parking and facilities and prepare for increased use in low emissions vehicles. Refer also to Table: Analysis of VPP ESD responses under consideration – TRANSPORT p. 23 of ESD Roadmap document as outlined in second column of Appendix I of this submission.

The Institute supports this broad reform objective. In addition to electric vehicles, low emissions vehicles should include motorbikes and other small vehicles, as these are also included in rating tools such as Green Star.

We strongly support the development of accessible public transport options and corresponding investment in infrastructure that provides people across metropolitan Melbourne with increasing scale of efficient and feasible public transport choices. We note the relative financial disadvantage for people with low to medium incomes who reside in outer commuter suburbs who generally have insufficient public transport compared to

people residing in well- serviced middle and inner suburbs, particularly those with lower levels of disadvantage (as measured through SEIFA indexes²).

The intent of the consultation paper under the heading Active Transport is supported in relation to 20-minute neighbourhood and cycling. We note the VPP Clause 52.34 update is not yet available.

While there are increasing road reconfigurations in the central business district of Melbourne for bike lanes, not all roads are sufficiently well managed and appropriately demarcated for cycling. An example is the east bound end of eastern end of Collins St (towards the Treasury Building) where the bike lane narrows to some 300mm wide. Cycle lanes and Tram super stops may be coordinated with further work-shopping with Public Transport Authorities.

Not all cyclists, or people who aspire to cycle in city traffic are sufficiently well acclimatised to cycling in traffic and cycling safely among cars, buses and trams. What this indicates is the lack of coordination between transport organisations. All too often the super stops for trams are not aligned carefully with other infrastructure such as bike paths and even precinct nodal points for buildings. Infrastructure planning needs to be aligned with building planning to ensure the best outcomes.

Similarly, there are a significant proportion of motor vehicle drivers who display a disregard and even contempt for cyclists. There is a gap in public education on these issues in terms of encouraging safer road user behaviour and developing competency among cyclists, motor vehicles and users of other personal vehicles such as motorised skateboards. The introduction of a 1m separation law for cyclists in Victoria (in line with other states) is welcomed, however there is much more to be done to improve this gap in public education.

The City of Melbourne has insufficient secure bike parking at the scale seen in cities such as Amsterdam or Copenhagen. Public end of trip facilities and free underground public bike parking were removed when the City Square (and below ground car park) were excavated for the new rail link construction. Bicycle vandalism including deliberate buckling of wheels and removal of bicycle components associated with on-street parking are among the issues which still need to be addressed to render the city more amenable to large scale cycling. Larger communal on-street parking, well-lit and under CCTV cover may significantly impact the level of vandalism in lieu of single and double bike racks randomly located across the CBD.

Similar issues would need to be addressed in other locations across the metropolitan area so that cycling as one major form of active transport becomes a more widespread default form of transport. In the longer term, our society could aim to see bicycles in their various

²[https://www.abs.gov.au/ausstats/abs@.nsf/mf/2033.0.55.001#:~:text=SEIFA%202016%20has%20been%20created,of%20Economic%20Resources%20\(IER\).](https://www.abs.gov.au/ausstats/abs@.nsf/mf/2033.0.55.001#:~:text=SEIFA%202016%20has%20been%20created,of%20Economic%20Resources%20(IER).)

forms (e.g. including long-tail and cargo bikes designed to safely carry children and shopping) outnumber SUVs in suburban shopping centre vehicle parks.

We note the more aspirational provisions for cycling parking and end of trip facilities that have been adopted by member councils of the Council Alliance for a Sustainable Built Environment (CASBE). CASBE expects developments to meet their Built Environment Sustainability Scorecard (BESS) Standards as shown in the tool notes for Transport³. These include:

- *All residential developments:* bicycle parking space of 1 secure bicycle space provided per dwelling 1 per 4 dwellings for visitors. In comparison current VPP Clause 53.34 provides 1:5 and 1:10 spaces for residents and visitors respectively for developments of four or more storeys.
- *Non-residential developments:* Points are awarded where current VPP Clause 52.34 planning scheme requirements for employee bicycle parking have been exceeded by at least 50%. A proposal also achieves the bicycle parking credits for non-residential developments that provides accessible showers (1 per 10 bicycles spaces), changing facilities adjacent to showers and one secure locker per bicycle space in the changing facilities. Currently, in VPP 52.34 showers for Employees and Residents are geared to the *allocated bicycle spaces* on the basis of 1 shower for the first 5 employee bicycle spaces, plus 1 to each 10 employee bicycle spaces thereafter. However, in turn, the bicycle spaces are only allocated for offices on the basis of 1 to each 300 sq m of net floor area *if the net floor area exceeds 1000 sqm*.

In the review of current VPP Clause 52.34 in relation to bike park ratios, we recommend adopting the SDAPP BESS standard at minimum and to conduct research into various workplace and other non-residential occupancies to determine higher numerical ratios for bike parking and end of trip facilities that might be provisioned on a notional *per employee* basis for different workplace occupancy configurations.

2.6 Broad reform objectives: Reduce exposure to air and noise pollution.

Siting and design guidance will help minimise exposure to noise and air pollutants for new residences and other sensitive uses located near busy transport routes. Refer also to Table: Analysis of VPP ESD responses under consideration - AIR AND NOISE POLLUTION p.27 of ESD Roadmap document as outlined in second column of Appendix I of this submission.

The Institute supports the intent of the broad reform objective. However it should be noted that Indoor Environment Quality (IEQ) which includes matters such as daylight, air quality, thermal and acoustic comfort, and which are the outcome of good design, that create positive health and wellbeing impacts for building occupants and users could be strengthened at the planning stage.

³ See: <https://www.bess.net.au/tool-notes/>

Daylight and ventilation sub-clauses are found throughout VPP Clauses 53 (General Requirements and Performance Standards), 55 (Two or More Dwellings on a Lot and Residential Buildings) and 58 (Apartment Developments).

Whereas noise and air pollution provisions focus on the avoidance of adverse impacts from surrounding environmental characteristics, Indoor Environment Quality (IEQ) provisions seek to ensure that positive characteristics of natural daylight and fresh air contribute to indoor spaces.

Similarly, we support that the proposed addition of *Recommended Separation Distances for Industrial Residual Air Emissions – Guideline* (Environment Protection Authority, 2013) to VPP Clause 13.06-1S (Air quality management). This guideline defines ‘sensitive uses’ to include ‘residential’. It contains tables of recommended minimum separation distances that aims to minimise the off-site impacts on sensitive land uses arising from unintended, industry-generated odour and dust emissions. However this guideline is an existing EPA requirement. Moreover, it does not directly create specifications for Indoor Environment Quality.

To add emphasis, it is important that in Stage 2 of the ESD Roadmap implementation that changes to clauses 53, 55, and 58 are not made that remove Indoor Environment Quality specification provisions such as those pertaining to daylight and ventilation.

Finally, air quality is one of the major problems of our cities and suburbs, occurring as a result of industrial residual air emission and transport emissions. The Institute reminds the Victorian government that air and noise pollution does not just create immediate human health and wellbeing impacts which require design and planning controls when undertaking residential or other ‘sensitive uses’ development. It also adversely impacts other animal species and contributes in a major way to loss of biodiversity. As such, it is a reminder that overall efforts to reduce these emissions should continue.

2.7 Broad reform objectives: Improve building energy efficiency and support the transition to a low emission future.

Ensure buildings are sited and orientated to optimise energy efficiency and encourage use of renewable energy. Refer also to Table: Analysis of VPP ESD responses under consideration – ENERGY – page 20 of ESD Roadmap document as outlined in second column of Appendix I of this submission.

The Institute supports the broad reform objectives including precinct renewable energy systems and renewable energy systems on buildings. This includes support for ‘Solar ready’ building design to support future installation of rooftop solar systems, to ensure that the roof orientation and pitch would also be compatible with efficient solar power generation.

With respect to the proposal to provide clearer guidance on assessing ‘unreasonable’ overshadowing of rooftop solar panels we note that overshadowing of solar panels is

referred to in a number of VPP clauses. However, it is currently not accompanied by detailed specifications that apply to other general overshadowing as described in Clauses 53.17-3 and 53.20-6.14 or diagrammatic and numeric guidelines for daylight access.

Improved guidance on passive design is also supported. We note that the Australian Government's *Your Home* program already provides guidance on passive design⁴ as well as design options and technical drawing templates for a range of energy efficient houses in capital city locations across the country⁵.

We recommend that the second-to-last bullet for the proposed amendment to VPP Clause 15.01-2S Building design in Appendix I of the Roadmap includes the addition of "lighting" so as to be worded 'Passive design responses that minimise the need for heating, cooling and lighting'.

The Institute promotes National Construction Code (NCC) compliance but also has adopted a position that the Australian Government establishes a national plan towards zero carbon buildings by 2030 that can be supported and led where appropriate by state and local government.

2.8 Broad reform objectives: Enhance the role of planning in stormwater management and efficient water usage.

Planning measures to support sustainable water management were introduced in 2018. Additional measures will focus on supporting ongoing implementation and support for these changes. Refer also to Table: Analysis of VPP ESD responses under consideration - WATER - page 21 of ESD Roadmap document as outlined in second column of Appendix I of this submission

The Institute supports this broad reform objective.

2.9 Strengthen and extend ESD considerations for commercial and industrial developments.

Strengthen and extend ESD considerations for commercial and industrial developments

The Institute supports this broad reform objective.

⁴ See: <https://www.yourhome.gov.au/passive-design>

⁵ See: <https://www.yourhome.gov.au/house-designs#Melbourne>

3 APPENDIX I – BROAD REFORM OBJECTIVE AND KEY PLANNING REFORMS.

Broad reform objectives (P4 and P 12)	Coinciding Tables from ESD planning reforms: key areas
<p>Make it easier to recycle: To support the government’s recycling and waste minimisation goals, planning standards for new buildings will be updated to make it easier and more convenient for building occupants to divert materials for reuse or recycling.</p>	<p style="text-align: center;"><u>WASTE AND RECYCLING p.22</u></p> <p>Planning policy framework (PPF) <i>Resource recovery:</i> Development siting and design that facilitates waste minimisation, segregation, storage and collection, and the use of recycled materials</p> <p>Residential <i>Resource recovery:</i> Update of standards for apartments and developments of two or more dwellings on lot to include key elements from Sustainability Victoria’s Better Practice Guide for Waste Management and Recycling in Multi-unit Developments</p> <p>Encourage assessment of opportunities for subdivision infrastructure to facilitate small scale recycling and resource recovery technologies (e.g. reverse vending machines)</p> <p>Commercial <i>Resource recovery:</i> Adopt minimum requirements to support effective management, separation and storage of waste and recycling</p> <p>Encourage assessment of opportunities for subdivision infrastructure to facilitate small scale recycling and resource recovery technologies (e.g. bio-digestion unit in commercial precinct)</p> <p>Industrial <i>Resource recovery:</i> Adopt minimum requirements to support effective management, separation and storage of waste and recycling</p> <p>Encourage assessment of opportunities for subdivision infrastructure to facilitate small scale recycling and resource recovery technologies (e.g. bio-digestion unit in commercial precinct)</p>
<p>Cool new developments and our urban environment: With a changing climate bringing more frequent hot days, practical landscape and design measures to reduce urban heat impacts will be developed.</p>	<p style="text-align: center;"><u>LANDSCAPING AND BIODIVERSITY p.25 and URBAN HEAT p.26</u></p> <p>Planning policy framework (PPF) <i>Tree canopy:</i> Enhancing and protecting the urban forest, and supporting urban biodiversity</p> <p><i>Biodiversity:</i> Contribute to protecting and enhancing urban biodiversity values</p> <p><i>Urban heat amelioration</i> Including urban heat reduction as part of responding to climate change impacts</p> <p>Supporting the provision and protection of urban tree canopy cover to help reduce urban heat</p> <p>Residential <i>Tree canopy:</i> Suite of planning measures to support retaining and increasing urban tree cover as further developed through the forthcoming planning response to cooling and greening*</p> <p><i>Biodiversity:</i> Consideration of measures to support urban biodiversity</p> <p><i>Urban heat amelioration:</i></p>

	<p>Guidance and new planning standards to reduce urban heat exposure (in addition to tree canopy cover), including cool paving and surfaces, shade devices and water sensitive urban design[^]</p> <p>Commercial <i>Tree canopy:</i> Suite of planning measures to support retaining and increasing urban tree cover as further developed through the forthcoming planning response to cooling and greening*</p> <p><i>Biodiversity:</i> Consideration of measures to support urban biodiversity</p> <p><i>Urban heat amelioration:</i> Guidance and new planning standards to reduce urban heat exposure (in addition to tree canopy cover), including cool paving and surfaces, shade devices and water sensitive urban design[^]</p> <p>Industrial <i>Tree canopy</i> Suite of planning measures to support retaining and increasing urban tree cover as further developed through the forthcoming planning response to cooling and greening*</p> <p><i>Biodiversity</i> Consideration of measures to support urban biodiversity</p> <p><i>Urban heat amelioration:</i> Guidance and new planning standards to reduce urban heat exposure (in addition to tree canopy cover), including cool paving and surfaces, shade devices and water sensitive urban design[^]</p> <hr/> <p>* this would also comprise part of any required design response to urban heat. [^] Complementing the suite of planning measures to support retaining and increasing urban tree cover as further developed through Plan Melbourne's Action 91 - Cooling and Greening project.</p>
<p>Facilitate active and sustainable transport choices: To match changing community needs new standards will provide for adequate bicycle parking and facilities and prepare for increased use in low emissions vehicles.</p>	<p style="text-align: center;"><u>TRANSPORT P. 24</u></p> <p>Planning policy framework (PPF) <i>Low emissions vehicles :</i> Provision of infrastructure to support low emission vehicles (inc. electric vehicles)</p> <p><i>Active transport:</i> Clearer policy on bike parking and end of trip facilities for commercial and multi-residential development</p> <p><i>Public transport:</i> (Comprehensively covered through existing policy)</p> <p>Residential <i>Low emissions vehicles:</i> Investigate design measures to support new multi-unit developments being EV ready</p> <p><i>Active transport:</i> Review bicycle space allocation requirements and end of trip facility standards of clause 52.34 Consideration of development interaction with strategic cycling corridors Review planning policy, tools and guidance to support sustainable and active transport outcomes for land use development</p> <p><i>Public transport:</i> Review planning policy, tools and guidance to support sustainable and active transport outcomes for land use development</p> <p>Commercial</p>

	<p><i>Low emissions vehicles:</i> Investigate design measures to support new developments being EV ready</p> <p><i>Active transport:</i> Review bicycle space allocation requirements and end of trip facility standards of clause 52.34 Consideration of development interaction with strategic cycling corridors Review planning policy, tools and guidance to support sustainable and active transport outcomes for land use development</p> <p><i>Public transport:</i> Review planning policy, tools and guidance to support sustainable and active transport outcomes for land use development</p> <p>Industrial</p> <p><i>Low emissions vehicles:</i> Investigate measures to support new industrial developments being designed to be EV ready, where appropriate</p> <p><i>Active transport:</i> Review bicycle space allocation requirements and end of trip facility standards of clause 52.34 Consideration of development interaction with strategic cycling corridors Review planning policy, tools and guidance to support sustainable and active transport outcomes for land use development</p> <p><i>Public transport:</i> Review planning policy, tools and guidance to support sustainable and active transport outcomes for land use development</p>
<p>Reduce exposure to air and noise pollution: Siting and design guidance will help minimise exposure to noise and air pollutants for new residences and other sensitive uses located near busy transport routes.</p>	<p style="text-align: center;"><u>AIR AND NOISE POLLUTION p.27</u></p> <p>Planning policy framework (PPF) <i>Air and Noise pollution exposure from transport corridors:</i> Recognising the impacts on human health from air and noise pollution exposure</p> <p>Supporting use of siting, layout and design responses to minimise sensitive land use exposure to air and noise pollution from transport corridors</p> <p>Residential <i>Air and Noise pollution exposure from transport corridors:</i> Extend apartment noise design standards to other residential developments and other noise sensitive land uses</p> <p>Implement siting and design standards to reduce impacts of air and noise pollution from transport corridors on building occupants</p> <p>Commercial and Institutional <i>Air and Noise pollution exposure from transport corridors:</i> Implement noise and air pollution siting and design standards for sensitive land uses</p>
<p>Improve building energy efficiency and support the transition to a low emission future: Ensure buildings are sited and orientated to optimise energy efficiency and encourage use of renewable energy.</p>	<p style="text-align: center;"><u>ENERGY – page 20</u></p> <p>Planning policy framework (PPF) <i>Energy efficiency:</i> Planning siting and design measures to support achievement of energy performance standards of NCC</p> <p><i>Precinct renewable energy systems:</i> Support Victorian GHG emission reduction targets through adoption of renewable and distributed energy technologies</p> <p><i>Renewable energy systems on buildings:</i> Support Victorian GHG emission reduction targets through adoption of renewable and distributed energy technologies</p>

	<p>Residential <i>Energy efficiency:</i> Improved guidance on passive design including building and subdivision orientation</p> <p><i>Precinct renewable energy systems:</i> Support for generation and deployment of renewable and distributed energy systems</p> <p><i>Renewable energy systems on buildings:</i> Updated development standards to minimise overshadowing</p> <p>Clearer guidance on assessing ‘unreasonable’ overshadowing of rooftop solar panels</p> <p>Investigate measures to support ‘solar ready’ building design to support future installation of rooftop solar systems</p> <p>Commercial <i>Energy efficiency:</i> Complementary benefits arising from urban heat responses (see urban heat section below)</p> <p><i>Precinct renewable energy systems:</i> Support for generation and deployment of renewable and distributed energy systems</p> <p><i>Renewable energy systems on buildings:</i> Support for generation and deployment of renewable and distributed energy systems</p> <p>Industrial <i>Energy efficiency:</i> Complementary benefits arising from urban heat responses (see urban heat section below)</p> <p><i>Precinct renewable energy systems:</i> Support for generation and deployment of renewable and distributed energy systems</p> <p><i>Renewable energy systems on buildings:</i> Support for generation and deployment of renewable and distributed energy systems</p>
<p>Enhance the role of planning in stormwater management and efficient water usage: Planning measures to support sustainable water management were introduced in 2018. Additional measures will focus on supporting ongoing implementation and support for these changes.</p>	<p style="text-align: center;"><u>WATER – page 21</u></p> <p>Planning policy framework (PPF) <i>Stormwater management</i> (Updated in 2018)</p> <p><i>Water efficiency/ potable substitution</i> Conservation of drinking water supplies through supporting use of alternative water sources</p> <p>Residential <i>Stormwater management</i> Enhance planning system guidance to support implementation of the 2018 stormwater reforms</p> <p><i>Water efficiency/ potable substitution</i> Review measures to support water efficiency/ use of alternative water sources</p> <p>Commercial <i>Stormwater management</i> Enhance planning system guidance to support implementation of the 2018 stormwater reforms (e.g. advice on treatment options to meet planning standards)</p> <p>Review how to support Vic Smart processes to improve assessment of stormwater management</p> <p><i>Water efficiency/ potable substitution</i> Review measures to support water efficiency/ use of alternative water sources</p>

	<p>Industrial</p> <p><i>Stormwater management</i></p> <p>Enhance planning system guidance to support implementation of the 2018 stormwater reforms (e.g. advice on treatment options to meet planning standards)</p> <p>Review how to support Vic Smart processes to improve assessment of stormwater management</p> <p><i>Water efficiency/ potable substitution</i></p> <p>Review measures to support water efficiency/ use of alternative water sources</p>
<p>Strengthen and extend ESD considerations for commercial and industrial developments:</p> <p>Planning for these land uses does not incorporate many environmental factors, apart from stormwater management. New provisions will be developed to expand the number of relevant ESD considerations for these forms of development.</p>	