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Department of Planning, Housing and Infrastructure
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Dear Resilience Planning Team,

The NSW Chapter of the Royal Australian Institute of Architects welcomes the opportunity to comment on the NSW Government's proposed Climate Change and Natural Hazards State Environmental Planning Policy (SEPP) and supporting documents.

Summary statement

The Australian Institute of Architects supports the strategic intent of the proposed Climate Change and Natural Hazards State Environmental Planning Policy and recognises the importance of embedding climate risk within land-use planning decisions. As climate impacts intensify, strengthening the planning system's capacity to reduce exposure to hazards such as extreme heat, flooding and bushfire is both urgent and necessary to safeguard communities.

To maximise effectiveness, the Institute recommends the final policy provide clear and workable planning provisions, strengthen climate-responsive design outcomes, recognise the health of Country and cultural knowledge, and support practical implementation across the planning system.

Institute Response

Under the Institute's Code of Professional Conduct, architects have a responsibility to protect the health, safety and wellbeing of communities and to advance the public interest through environmentally responsible design and planning.

Climate change is accelerating, and the need for immediate and sustained action to reduce risk in the built environment has never been more pressing. Natural hazards including extreme heat, flooding, bushfire, storms and coastal change are intensifying in frequency and severity, with direct impacts on housing quality, infrastructure performance, public health and community resilience.

Evidence from Australia's National Climate Risk Assessment and research from CSIRO confirms that these risks are already affecting Australian communities and will continue to intensify over coming decades. Economic impacts are also significant and systemically interconnected. Data from the Insurance Council of Australia demonstrates increasing insured losses from extreme weather events and growing exposure of housing and

infrastructure to climate risk. These impacts are often most severe for vulnerable communities, who may have fewer resources to adapt to increasing climate risks.

Planning policy therefore plays a critical role in reducing climate risk before development occurs. The proposed SEPP represents an important opportunity to strengthen the integration of climate and natural hazard considerations within the NSW planning system and to support safer, healthier and more resilient communities.

The Institute recognises the importance of an integrated approach to climate resilience that aligns strategic and land-use planning, building standards, infrastructure systems and retrofit strategies. We also emphasise the importance of place-based responses that recognise the health of Country, cultural knowledge and community wellbeing.

The Institute broadly welcomes the direction of the proposed reform, particularly the consolidation of fragmented provisions into a clearer statewide framework and the recognition of urban heat as a core land-use planning issue. The policy will be most effective where it provides clear, practical and measurable direction that can be consistently applied in practice.

The Institute's central position is that climate-resilient architecture and risk-informed planning are essential to protecting communities and strengthening long-term housing resilience in NSW.

Architects are well placed to contribute to resilient, climate-responsive communities through design decisions that address hazard exposure, improve thermal performance and reduce environmental impact. The profession is ready to work with government to support effective implementation of this reform.

The Institute offers the following observations and recommendations.

1. Practical clarity and implementation

We acknowledge that the exhibited material is necessarily high-level and that more detailed guidance, mapping, training and implementation support will follow. However, the absence of detailed provisions makes it difficult to fully test how the new framework will operate in practice.

Consolidation of existing resilience and hazard provisions is welcome in principle, but consolidation alone will not improve outcomes unless it is accompanied by requirements that are understandable, measurable and readily applied by applicants, consent authorities and the wider industry.

The Institute encourages continued engagement with practitioners as the detailed provisions and guidance are prepared. We would welcome the opportunity to assist the Department in testing implementation pathways and design responses, so they are clear, proportionate and capable of delivering meaningful improvements in resilience.

Effective implementation will also depend on practical tools including guidance notes, checklists, mapped hazard data, worked examples and training resources for councils and practitioners.

2. Planning at the appropriate scale

The Institute notes the importance of addressing climate and natural hazard risk at multiple planning scales. While development assessment plays an important role, many climate risks arise from cumulative planning decisions made across neighbourhoods, release areas and catchments.

Planning frameworks should therefore support risk-informed decision-making not only at the individual site level but also at broader landscape, settlement and catchment scales. This is particularly important where hazards such as flooding, heat vulnerability or bushfire exposure accumulate across urban areas.

Accessible and consistent hazard and climate mapping will also be critical to support effective decision-making across the planning system.

3. Clear baseline measures and a workable compliance pathway

The Institute supports an outcomes-focused framework. In practice, outcomes are most effective when supported by a clear baseline of measures for common development types.

A simple pathway of design-led baseline requirements, combined with a performance pathway for well-justified alternatives, would provide clarity while preserving room for innovation and good design.

Consideration should be given to whether these requirements apply consistently across jurisdictions, including where necessary through mechanisms that prevail over inconsistent local LEP provisions. Without a clear and consistent basis for application and assessment, the policy intent risks uneven application between councils.

Practical guidance, clear assessment criteria and officer training to support local government staff will also be required to support the new SEPP. This will ensure consistent or measurable outcomes, particularly in remote and regional communities where climate risk is often more acute and locally responsive planning is most needed.

Such an approach would reduce ambiguity in development assessment, support consistent decision-making and avoid unnecessary delays or redesign later in the process.

4. Strengthening the urban heat response

The draft Urban Heat Policy represents a significant and welcome step forward. Rising temperatures present growing risks to public health, housing performance and urban liveability.

Urban heat responses should move beyond general consideration of cooling measures and provide clearer direction on practical design responses that are already well understood and often low-cost when addressed early in the design process.

These include passive solar orientation, natural cross-ventilation, effective external shading, deep soil and canopy tree provision, landscape-based cooling, reduced hardstand and heat-reflective surfaces and appropriate material selection for roofs and paving.

These strategies should also be considered at subdivision and precinct scale, including shade tree planting and landscape-based cooling within streets and public spaces.

Research also demonstrates that heat exposure disproportionately affects vulnerable communities. Planning responses should therefore address both technical performance and social equity outcomes.

5. Climate scenario guidance

The Institute supports the Draft Climate Change Scenario Guidelines and the intention to provide consistent, evidence-based climate projections for planning decisions.

Reliable and accessible climate information is essential to ensure development reflects future conditions rather than historic risk.

The guidelines should:

- Provide practical guidance for planners and practitioners
- Support locally responsive decision-making
- Address uncertainty in climate modelling
- Integrate cultural knowledge and Aboriginal perspectives
- Align with emerging national climate adaptation research.

6. Cultural Engagement

The Institute strongly supports recognition of Aboriginal knowledge systems and cultural perspectives within climate and planning policy and calls for this is supported by clear implementation pathways, consistent assessment requirements and measurable planning outcomes.

References to Government Architect NSW resources, including the Connecting with Country framework is appropriate as a foundation for culturally informed and place-based planning. However, the effectiveness of this process will depend on how it is embedded within statutory planning controls, strategic planning processes and development assessment frameworks, rather than remaining as high-level policy guidance.

7. Aligning housing delivery and climate resilience

Climate resilience and housing supply objectives can be addressed together through well-considered planning and design.

Many effective resilience measures are design-led and cost-neutral when integrated early. Orientation, shading, landscape provision, tree canopy, material selection and passive design strategies can significantly improve performance while supporting housing delivery and long-term liveability.

Clear policy settings that prioritise these design-led measures will reduce uncertainty and avoid costly redesign or retrofitting later in the development process.

8. Existing housing and retrofit

While the SEPP will primarily shape new development, many communities currently exposed to climate risk live in existing housing stock with poor thermal performance or hazard resilience, including vulnerable communities.

Improving the resilience of existing housing will therefore be an important complementary strategy. Programs that support retrofit, cooling and resilience improvements in existing communities would significantly strengthen the broader policy response.

9. Interface with the National Construction Code

Some aspects of thermal comfort and building performance are regulated through the National Construction Code.

The SEPP should therefore complement rather than duplicate the Code, while providing clear planning direction on urban scale matters such as subdivision layout, landscape provision, public domain cooling and site planning.

Ongoing coordination across planning, building and infrastructure systems will be important to ensure consistent outcomes.

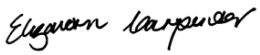
Key recommendations

To maximise effectiveness, the Institute recommends the final SEPP should:

1. Establish clear, workable and enforceable policy guidance and provisions that can be consistently applied across the planning system.
2. Provide practical statewide baseline measures for climate-responsive design and urban heat mitigation with sufficient flexibility to respond to local conditions.
3. Support both baseline and performance-based pathways to enable design innovation.
4. Ensure implementation is supported by guidance, tools, mapping, up to date datasets and practitioner education to support consistent interpretation and application.
5. Address climate hazard risk across multiple planning scales, including cumulative impacts across release areas and catchments.
6. Embed cultural engagement and Aboriginal knowledge within strategic planning frameworks.
7. Support local government implementation through appropriate guidelines, training and capability-building for local assessment authorities.
8. Support alignment between planning policy, the National Construction Code and related technical systems, to ensure coordination and practical application.
9. Ensure policy settings prioritise design-led resilience measures – these can deliver improved performance without introducing additional complexity or cost.
10. Consider complementary programs that improve resilience of existing housing and communities.
11. Engage with architects and practitioners in the development of both the SEPP to leverage expertise in design, planning and implementation.

The proposed SEPP represents an important opportunity to embed climate resilience within the NSW planning system and reduce long-term risks to communities, housing and infrastructure. The Institute is committed to working with government to ensure the final policy delivers practical, measurable and enduring resilience outcomes for the people and places of NSW.

Yours sincerely,



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