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About the VLGA

The Victorian Local Governance Association (VLGA) is a unique peak body for councillors, community leaders and local governments working to build and strengthen their capacity to work together for progressive social change.

Our membership consists of local governments (representing 86% of Victoria's population), community organisations and individuals.

Our vision is for Victorian communities to be inclusive, sustainable and dynamic, characterised by strong leadership and effective local governance.

We believe that transparent, accountable and democratic governance policies and practices in all settings enable citizens to create their own sustainable futures.

Executive Summary

For several years, the VLGA has been working closely with local governments and community organisations in Victoria in developing approaches for adapting to climate change. This perspective informs the following submission, which has an emphasis on the barriers faced at a local level by local governments seeking to serve and partner with their communities in adapting to the challenges of climate change.

There is a particular focus on supporting adaptation responses that are socially equitable. Aspects of the Productivity Commission's discussion paper that emphasise flexible, 'no-regrets' approaches are supported, as they are in accordance with the VLGA's 'Liveable and Just' principles. The VLGA requests, however, that the flexibility and efficiency of market-based approaches be tempered with a need to overcome socio-economic, geographic and inter-generational inequities that such approaches alone will not address.

This includes the need to support resource-constrained local governments in their work on climate adaptation at a local level, as many of the regional and rural areas most impacted by the climate change are also those with the least capacity to respond effectively. This goes beyond financial and resource support, and extends to measures by state and federal governments to develop more integrated population and settlement strategies, to reform land use planning systems and building codes, and to refine disaster management and relief arrangements. Along with co-ordination of practical tools, such as national mapping of climate-related risks, these measures would go a long way towards overcoming barriers to effective climate adaptation at a local government and community level.

VLGA Recommendations

The VLGA:

1. endorses an approach to adaptation to climate change that is flexible and takes 'no-regrets' actions that build community resilience to a range of potential shocks, including, but not limited to, those of anticipated climate change
2. recommends that effective adaptation be defined by the Commission so as to explicitly acknowledge that interventions and strategies that disproportionately benefit those individuals or groups with the least capacity for taking action on their own will bring a higher overall net benefit to the community as a whole
3. requests that the Commission define barriers to adaptation in a manner that acknowledges geographic and inter-generational inequities in adapting to climate change, and supports measures to overcome these
4. requests that the Commission identifies the limitations of market-based approaches in overcoming these barriers to adaptation
5. recommends that a national population and settlement strategy be developed, incorporating objectives related to climate change adaptation
6. recommends the adoption at a national and/or state level of consistent, stringent minimum standards for the energy and water efficiency of new buildings to facilitate long term climate adaptation
7. recommends the adoption at a national and/or state level of land use planning objectives for supporting long term food security under uncertain future climate conditions, with appropriate flexibility for implementation by local governments
8. recommends the establishment of planning and building codes supporting adaptation to increasing risk of climate-related natural disasters, setting clear, evidence-based objectives and policies at a consistent state (or national) level, while allowing sufficient flexibility to apply them appropriately at the finer grain required at a local level
9. recommends the adoption of land-use planning measures to effectively protect and link larger-scaled native vegetation and habitat areas from cumulative degradation through development, in order to assist long term species and ecosystem adaptation to climate change
10. recommends a review of Natural Disaster Relief and Recovery Arrangements, to clarify the roles and responsibilities of the Commonwealth, state and local governments in responding to natural disasters, to ensure that funding arrangements are clear, efficient, equitable and adequate (both for immediate relief and long-term recovery)
11. requests that detailed research and mapping of climate change vulnerability be conducted by the Commonwealth and/or state governments and that this data, along with existing relevant spatial and socio-economic data, be made available to local governments in such a way as to facilitate development of comprehensive local climate adaptation strategies

12. requests financial support for local governments, particularly resource-constrained smaller municipalities, to develop these strategies, which may be mandated under a national adaptation framework
13. recommends that the Commission include the following criterion for assessing reforms to reduce barriers to adaptation: "*Equity of reform* – does the reform address a significant inequity of a social, geographic or intergenerational nature? This might warrant a higher cost measure in order to achieve benefits that would not be realised without the reform"

The VLGA Submission

Introduction

The VLGA has played a very active role in assisting local governments to work with their communities in developing climate change adaptation strategies, in particular through the project *Liveable and Just: a toolkit for local government to address the social and equity impacts of climate change*. The toolkit was launched in 2010, having been developed in conjunction with the McCaughey Centre at the University of Melbourne and the Brotherhood of St Laurence, with support from the Victorian Government's Sustainability Fund. The toolkit has been widely distributed and, in the first half of 2011, the VLGA conducted a series of regional workshops to facilitate its implementation, with financial support from the credit union mecu Ltd. These workshops were attended by officers, councillors and community organisation representatives from 29 Local Government Areas in rural and regional Victoria.

The research conducted with local governments in developing the toolkit, as well as feedback gathered from the workshops, has given the VLGA a close understanding of the issues facing local governments and local communities in developing adaptation measures in response to climate change impacts, with a particular focus on developing community resilience in ways that support the most vulnerable.

The VLGA's understanding about climate adaptation gained from the *Liveable and Just* program is complemented by our extensive project work in community food security, land use planning, and diverse and affordable housing, as well as regular work in supporting good governance and effective community engagement within local government. It is this perspective that frames the VLGA's responses to the Productivity Commission's issues paper and guiding questions.

Consultation

The VLGA has not conducted specific feedback in developing this submission, but its content is consistent with member feedback through the programs mentioned above, as well as policies developed by the VLGA over time and adopted by the elected Board.

Responses to questions raised by the Commission

Section 2: What does adaptation to climate change mean?

How is effective adaptation best defined? How can it best be assessed? In other words, is the rate of adaptation 'too much' or 'not enough', 'too soon' or 'too late'? What other considerations may be relevant for maximising the net benefits to the community from adaptation?

What kinds of adaptation to climate change (and variability) have proven most effective to date?

How can uncertainty be addressed in the context of adaptation to climate change?

The Commission has rightly recognised the difficulties in defining and assessing climate change adaptation, and that developing adaptation responses involves dealing with incomplete information, cascading uncertainties and impacts that are uncertain, pervasive and diverse.

In its *Liveable and Just* program, the VLGA has not sought to precisely define what adaptation means, but has acknowledged that climate change is already bringing a range of impacts at a local level and will bring more in the future due to the level of global temperature rises that are already forecast. The specific level of impacts is uncertain, being dependent on a complex interaction of natural forces and human activity including mitigation efforts, but there is abundant evidence from the IPCC, CSIRO and other credible bodies that impacts will continue to be felt at a local level by communities in Victoria.

These impacts involve a range of high-impact shocks, including more frequent and intense natural disasters, as well as slower-developing impacts on local and regional economies, population health (including mental health) and social cohesion. Many of these are being felt already, if it is accepted that the events of the last 12 years, including drought, heatwaves, Black Saturday bushfires and floods – all of which have broken previous records – have at least in part been attributable to climate change in that they have corresponded with predicted amplifications of natural weather patterns and heightened the extremes. Furthermore, conflicts in planning for adapting to anticipated future impacts are being experienced in the present; examples are contested regulations on building in areas subject to potentially more extreme coastal inundation, flood and bushfire events.

The *Liveable and Just* response to this is an emphasis on building community resilience – defined as an ability to bounce back from shocks – in ways that are in accordance with the Commission's suggestion that effective adaptation requires flexible, 'no-regrets' approaches. The toolkit contains numerous case studies of local adaptation actions and strategies that seek to maximise local community benefits in the present, as well as building resilience to likely impacts of climate change. The approach avoids prescriptive recommendations for actions; rather, it emphasises assessing specific local vulnerabilities to climate impacts and developing tailored local responses.

Where the VLGA would add to the Commission's suggestions is by going beyond a 'net benefit' measure of effective adaptation and include a priority on measures to disproportionately benefit those who are already most vulnerable in local communities. In addition to the moral case for seeking to maximise the social equity benefits of any government interventions or policies, there is a risk that a simple 'net benefit' might be achieved by approaches that favour those who are most able to manage their own adaptation. Examples are subsidies or rebates for retrofitting buildings that tend to be taken up by higher income, property-owning groups who might have invested personal funds without support.

A 'net benefit' measure should therefore acknowledge that interventions and strategies that disproportionately benefit those individuals or groups with the least capacity for taking action on their own will bring a higher overall net benefit, as higher-capacity individuals and groups are likely to take action in their own interest in any case.

Recommendations

The VLGA:

1. endorses an approach to adaptation to climate change that is flexible and takes 'no-regrets' actions that build community resilience to a range of potential shocks, including, but not limited to, those of anticipated climate change
2. recommends that effective adaptation be defined by the Commission so as to explicitly acknowledge that interventions and strategies that disproportionately benefit those individuals or groups with the least capacity for taking action on their own will bring a higher overall net benefit to the community as a whole

Section 3: Are there barriers to adaptation?

What is the most useful way to classify, define and identify barriers to adaptation? Are the categories set out above appropriate? Are there other types of barriers?

What market failures could inhibit adaptation in any specific sector or region?

Are there examples of policy or regulatory barriers that could inhibit adaptation? What are these? Could the objectives of these policies or regulations be met in alternative ways that have greater benefits and/or lower costs and distortions?

What other significant barriers (for example, behavioural or organisational) might inhibit adaptation? What effects might these have on decisions about whether and how to adapt to climate change?

The VLGA's primary concern about barriers to effective adaptation is with regard to capacity and equity. While market-based approaches might go some way to achieving efficiencies, there are significant areas in which the market is not equipped to achieve effectiveness.

An example is in seeking the most efficient use of water. A *laissez faire* approach, letting the market ensure that water goes to the application of highest value, does not necessarily assist communities to adapt to diminishing availability in the event of climate change. Regulation is obviously required to ensure that basic human needs are met in times of acute shortage, but the recent extended drought in Victoria showed that the economies of many regional areas need support for both infrastructure and behaviour change in developing more efficient use of water for irrigation.

The market would simply move water to another place and allow an existing economy to collapse without allowing it time to adjust. In the event of more prolonged and acute droughts with climate change, along with changed growing regimes with higher temperatures, this will be an ongoing issue. With water, there are also geographic inequities to overcome, such as the ability for upstream communities to use water in ways that disadvantage downstream communities. Again, market measures alone cannot address this, as the current conflict over state and regional rights to water in the Murray-Darling basin shows.

The same can be said of intergenerational inequities, whereby adaptation measures in the short term might increase inequities in the long term and reduce the ability of future communities to adapt. One example of this is the depletion of soils in attempts to maintain the short-term viability of farms under pressure from more extended drought. Another is the rapid increase in use of air-conditioning to cope with heat-waves, thus driving up coal-based energy use (which exacerbates the climate change problem) as well as increasing living costs for both current and future home owners.

Market-based approaches don't overcome the individual inclination to prioritise short-term personal benefits over long-term ones, such as: "I can afford a theatre room in my new house but 7-star efficiency is too expensive". A long term view incorporates not only the individual home owner's cost savings over the short and medium term in adapting to climate change, but also the long term benefit of energy efficient housing stock for future buyers in a hotter and drier climate. Market measures such as energy ratings on houses at time of sale are insufficient for driving a large uptake in energy-efficient retrofitting, as the benefits are too diffuse and remote in time to affect consumer behaviour significantly. Therefore, interventions and regulation to ensure that new housing is more energy and water efficient, plus retrofitting of older housing stock, are required in order to drive adaptation measures with long term effectiveness.

Some barriers to implementing climate adaptation measures in building codes result from a reluctance by state and federal governments to introduce the necessary universal regulations. This often leaves local governments under community pressure to apply stronger planning and building standards at a local level, but lacking the powers to do so. In regulatory areas, such as the minimum energy and water efficiency standards, local governments do not wish to create illogical inconsistencies between municipalities, so stringent state or national standards are appropriate. State governments may need to be bolstered at a national (e.g. COAG) level in order to do this effectively, as proposals are frequently watered down following intense lobbying from the housing industry.

On a broader scale of managing land use, similar intergenerational inequities occur. A prudent risk-management approach would place a higher value than current markets do on protecting productive agricultural land, particularly where that land is close to major population centres in cooler regions on the seaward side of the Great Dividing Range; i.e. near most of our capital cities. This may be critical to future food security if hotter inland areas become less productive and transport costs skyrocket.

On an open market, this land continues to be converted to residential (and limited industrial) uses on urban growth fringes. Some mechanisms are available in state planning provisions for protecting land for agricultural use, but these are relatively weak and ad hoc in the face of demand for residential land due to population growth pressures.

A combination of a national population and settlement strategy, along with stronger measures to limit outward urban growth and consolidate within existing city areas, is required. This includes incorporating climate-adaptation objectives into planning schemes on a consistent national or at least state scale, and enabling local governments to interpret and apply these at a local level.

Local governments are often expected to respond to many of the immediate, locally felt climate impacts on communities without having the capacity to do so. Many of the most disadvantaged rural and regional communities are also the most vulnerable to climate change impacts of both an acute nature (natural disasters) and a long term social and economic nature (drought-related agricultural decline, regional shifts in

irrigation availability, reduced amenity due to hotter inland climates). These exacerbate other vulnerabilities such as declines in agricultural commodity prices, or exposure to rapid rises in oil and other energy prices being magnified by greater travel distances and dependency on oil-based inputs. The rural local governments in these areas are the most exposed to a combination of high cost-to-revenue ratios due to large road lengths to maintain an ageing built infrastructure, combined with a diminished capacity for rate-based revenue increases and (often) declining populations.

Local governments in urban areas also face inequities that pure market solutions cannot address. Examples include growth municipalities on metropolitan fringes, where significant pressure to process a rapid roll-out of land for new housing, without the necessary staff capacity and time to plan effectively, results in a lack of well-integrated developments that can incorporate approaches to better adapt to future climate impacts. This is exacerbated by a lack of supporting investment in transport and other infrastructure by state and Federal governments.

There are therefore significant capacity barriers for local governments in seeking to assist their local communities to adapt to climate change, particularly where there are inequities of a geographic and/or inter-generational nature. Market-based measures alone are incapable of addressing these issues, and effective adaptation will require a combination of tight universal minimum standards (e.g. in building codes) and broader objectives with local flexibility (e.g. in planning schemes).

Recommendations

The VLGA:

3. requests that the Commission define barriers to adaptation in a manner that acknowledges geographic and inter-generational inequities in adapting to climate change, and supports measures to overcome these
4. requests that the Commission identifies the limitations of market-based approaches in overcoming these barriers to adaptation
5. recommends that a national population and settlement strategy be developed, incorporating objectives related to climate change adaptation
6. recommends the adoption at a national and/or state level of consistent, stringent minimum standards for the energy and water efficiency of new buildings to facilitate long term climate adaptation
7. recommends the adoption at a national and/or state level of land use planning objectives for supporting long term food security under uncertain future climate conditions, with appropriate flexibility for implementation by local governments

Section 4: What policy instruments could be used to address the barriers?

How have state and local governments responded to the potential impacts of climate change through their planning and zoning policies? Are there existing planning policies that could constrain the ability of individuals and businesses to adapt, or reduce their flexibility? What reforms may be needed to meet community objectives while facilitating effective adaptation – are there good examples?

What implications might climate change have for local councils' planning policies and development approval processes?

Has concern about legal liability restricted the ability of councils to achieve good economic, social or environmental outcomes?

How might building regulation affect the ability of individuals and businesses to adapt to climate change? Are there any inconsistencies across the States and Territories that could impede adaptation?

What would be the costs and benefits of changing the way that the building code is applied across different geographic or climatic zones, or to establish new zones (for example, to allow for greater variation across regions)?

What government-provided goods and services might be significantly impacted by climate change? What decisions or trade-offs may have to be made – for example, about the balance between emergency response and preparedness, or the best way to protect natural environments when species may need to migrate?

Some aspects of these questions have been addressed in Section 3 above. With regard to adapting to the higher risk of climate-related natural disasters, elements of the VLGA's recent submission to the Victorian Planning System Ministerial Advisory Committee are pertinent. The VLGA noted that the Victorian Planning and Environment Act 1987 includes neither objectives nor specific policy provisions to address the challenges of mitigating and adapting to climate change (as well as to peak oil). While the full submission is available at http://www.vlga.org.au/Resources/Library/Review_of_Victorias_Overall_Planning_System_Submission.aspx, the following extracts are particularly relevant to the Commission's questions:

Adaptation to the impacts of climate change presents another set of challenges. These include implementing the recommendations of the Royal Commission into the 2009 bushfires, managing coastal impacts, revised assessment of flood risks due to the 2010/11 floods, and food security implications.

Managing the tensions between the rights of individual property owners and the community interest in preventing a perpetuation of development in areas known or likely to be of increasing risk with regard to bushfire, flood and coastal inundation

is a growing challenge to local governments as both Responsible Authorities and Planning Authorities. This necessitates a discussion of broader issues around liability and compensation and the respective rights and responsibilities of State and local governments and private property owners. Specific changes to the planning system can follow.

The VLGA does not have the resources to assess the full costs and benefits of amending land use planning legislation and building codes in order to better facilitate climate change adaptation. It is sufficient to note here that the cost of extreme events in Victoria alone – such as the Black Saturday bushfires of 2009 and the floods of 2010-11 – indicate that inaction in these areas is likely to cost considerably more than prudent action, given the credible predictions of increasingly severe extreme weather events. Measures to address greater coastal inundation risks fall into the same category, but a lack of clear State planning objectives and policy has led to an unsatisfactory regime of policy being determined by precedent through decisions at the Victorian Civil and Administrative Tribunal (VCAT), which is intended to be a review body rather than a policy-setting body. See, for example, *Gippsland Coastal Board v South Gippsland SC & Ors (No 2) (2008)*, VCAT 1545.

Local governments and referral agencies such as Coastal Boards, Catchment Management Authorities and Fire Authorities (and VCAT) are often left to assess development applications in a relative policy vacuum. At the other extreme, state governments sometimes apply knee-jerk blanket legislation in the aftermath of a disaster event out of a political need to seem responsive, rather than in a manner that is considered, evidence-based and strategic. This can leave a legacy of overly reactive regulation, as well as a lack of flexibility for local governments in applying planning principles. An example is sweeping regulations to allow vegetation clearing, enacted in Victoria following the 2009 bushfires, prior to an evidence base being established by the Royal commission (and extended since then despite a lack of supporting evidence).

These have left local governments powerless to find a balance between human safety and property protection on the one hand, and protecting native vegetation and habitat protection on the other. This has exacerbated existing difficulties in preserving the broad-scale, contiguous areas of vegetation that might assist future species to survive and migrate in a changing climate. The existing planning system, including measures such as 'net gain' offset plantings when vegetation is removed, is inadequate in preventing large cumulative losses from numerous small planning permit decisions.

With regard to strategic planning for adapting to increased risk of climate-related natural disasters, local governments would be greatly assisted by planning and building codes that establish clear, evidence-based objectives and policies at a consistent state (or national) level, with sufficient flexibility to apply them appropriately at the finer grain required at a local level.

Measures to more effectively protect larger-scale native vegetation and habitat areas from cumulative degradation – again with the necessary evidence base – might

necessitate less local flexibility being allowed. One precedent, which has maintained strong community support over a long period, is Victoria's legislation protecting Melbourne's 'Green Wedges' from development. This approach could be applied more widely for preserving and linking significant environmental areas at an ecosystem scale.

Are current relief payments, such as those funded through the Natural Disaster Relief and Recovery Arrangements, appropriate?

In many respects, arrangements for natural disaster relief and recovery work well, as evidenced by the effectiveness of responses in Victoria to both the Black Saturday bushfires and the widespread floods of 2010-11. From a local government perspective, it is appropriate that emergency funds are held at a Commonwealth and/or state level, with a proportion for distribution to local governments as appropriate in the event of natural disasters. This avoids the need for local governments to maintain insurance, or self-insure, for such events, which is unaffordable given the level of exposure in many cases.

There is, however, a need for making the arrangements between the three spheres of government clearer and more predictable, so that local governments can count on certain levels of support. This includes the need to extend funding for long-term community recovery in areas like mental health, where the needs can persist for many years.

What kinds of information are already provided by governments to help individuals or businesses to understand risks? Is there a case for more government provision of climate-related information, or to disseminate this differently?

Are there significant overlaps or inconsistencies between the adaptation policies of different levels of government? If so, what are these and what problems might they cause for effective adaptation? Alternatively, where differences exist, are there good examples of cooperative arrangements that could be adopted more broadly?

Is there a need to alter policy responsibilities (or clarify responsibilities) across the different levels of government in order to facilitate adaptation?

Are local governments adequately resourced and equipped to respond to climate change and implement policies developed by state and territory governments?

What are the most appropriate governance arrangements for overseeing adaptation responses at the local level?

There are significant inconsistencies and gaps in adaptation policy. There is little co-ordination of climate adaptation policy by the Victorian Government, and great variation between local governments with regard to the amount and comprehensive-ness of adaptation planning they have undertaken. Many local governments,

particularly the smaller rural shires which are in many ways the most vulnerable, have very little capacity to develop policy in this area, and lack the financial resources to implement new programs.

In response to this lack of capacity, the VLGA's *Liveable and Just* toolkit and training workshops have included several approaches for embarking on adaptation planning. The first has been to encourage local governments to do a self-assessment of existing programs and policies that may address climate adaptation without going under that label. Another element is to build on existing frameworks such as Municipal Emergency Management Plans, Municipal Public Health Plans and risk assessment tools, so that climate adaptation is incorporated into existing 'core business' rather than creating unreasonably burdensome new work. A third is to maximise the use of approaches with multiple benefits, so that consideration of adaptation programs gives weight to elements that deliver on other objectives such as increasing community connectedness and resilience to a diverse range of potential external shocks. Fourthly, a range of case studies allows learnings to be shared so that individual local governments don't need to 'reinvent the wheel'.

It should be pointed out that much of the more complex work required for thorough adaptation planning is beyond the capacity of local government and is also more logically carried out at a state or regional level. This includes detailed mapping and vulnerability assessments for coastal impacts, floods, bushfires and heat-waves. An effective approach would be for the research and mapping to be conducted at a state or national level and made available to local governments, with co-ordinated funding support for local governments to develop comprehensive, locally-appropriate strategies based on the information.

A truly integrated approach, enabling more consistency across local governments, would be to mandate the development of comprehensive municipal climate adaptation strategies that incorporate all available data from state and federal land management agencies, primary industry departments, ABS and other socio-economic data, health departments and so on. Much of the information exists, but the work has not been done to interpret and apply it locally in an integrated manner. If sufficient financial support were provided – particularly for under-resourced smaller municipalities – most local governments would welcome this opportunity to integrate disparate aspects of longer-range planning for their communities.

An integrated approach to climate adaptation planning has the potential to bring together currently piecemeal local responses that do not adequately manage the community impacts of a large range of climate related issues. These include drought relief and structural adjustments to water markets, coastal planning and management, bushfire preparedness (in Victoria, this includes implementing recommendations of the Black Saturday Royal Commission), heat-wave and other health impacts, local food security and climate-related migration patterns. A proportion of the state and Commonwealth funding currently directed to these specific issues could potentially be redirected to supporting integrated planning that considers these issues holistically rather than in isolation, at a municipal scale.

Recommendations

The VLGA:

8. recommends the establishment of planning and building codes supporting adaptation to increasing risk of climate-related natural disasters, setting clear, evidence-based objectives and policies at a consistent state (or national) level, while allowing sufficient flexibility to apply them appropriately at the finer grain required at a local level
9. recommends the adoption of land-use planning measures to effectively protect and link larger-scaled native vegetation and habitat areas from cumulative degradation through development, in order to assist long term species and ecosystem adaptation to climate change
10. recommends a review of Natural Disaster Relief and Recovery Arrangements, to clarify the roles and responsibilities of the Commonwealth, state and local governments in responding to natural disasters, to ensure that funding arrangements are clear, efficient, equitable and adequate (both for immediate relief and long-term recovery)
11. requests that detailed research and mapping of climate change vulnerability be conducted by the Commonwealth and/or state governments and that this data, along with existing relevant spatial and socio-economic data, be made available to local governments in such a way as to facilitate development of comprehensive local climate adaptation strategies
12. requests financial support for local governments, particularly resource-constrained smaller municipalities, to develop these strategies, which may be mandated under a national adaptation framework

Section 5: Setting priorities for reform

Depth of reform – does the reform address a problem that causes a large distortion in the allocation of resources? The larger the distortion, the greater the benefits of reform.

Breadth of reform – does the problem affect a large share of the community? The more widespread the benefits, the more likely the return from the reform will be higher.

Cost of reform – the costs of reform can include the costs to government of developing and implementing a reform, and the costs to business and the community of dealing with the changes. The higher the costs of a reform, the greater the payoff necessary to warrant the investment.

*Are these criteria relevant for assessing reforms to reduce barriers to adaptation?
Are there other considerations or criteria the Commission should take into account to assess the likely costs and benefits of reform options?*

What reform options might satisfy these criteria?

The VLGA generally supports these three criteria, but would include a fourth criterion of in accordance with Recommendations 2 and 3 above, in making the case for reforms that specifically address inequities of a socio-economic, geographic and inter-generational nature.

Reform options that might satisfy these criteria are contained in the above recommendations responding to specific issues.

Recommendation

The VLGA:

13. recommends that the Commission include the following criterion for assessing reforms to reduce barriers to adaptation: "*Equity of reform* – does the reform address a significant inequity of a social, geographic or intergenerational nature? This might warrant a higher cost measure in order to achieve benefits that would not be realised without the reform."

Resources

Liveable & Just Toolkit:

http://www.vlga.org.au/Resources/Liveable_Just_Toolkit.aspx

Integrating Land Use Planning and Community Food Security (Budge & Slade report):

<http://www.vlga.org.au/Resources/Library/IntegratingLandUsePlanningandCommunityFoodSecurity.aspx>

Joint Submission to the Parliamentary Inquiry into Environmental Design and Public Health in Victoria:

http://www.vlga.org.au/Resources/Library/VLGA_Joint_Submission_to_Inquiry_into_Environments_and_Health.aspx

Victorian Food Supply Scenarios (VEIL/VicHealth):

http://www.vlga.org.au/Resources/Library/Victorian_Food_Supply_Scenarios.aspx

Food Sensitive Planning and Urban Design (Heart Foundation):

http://www.vlga.org.au/Resources/Library/Food-sensitive_planning_and_urban_design.aspx

VLGA Submission to Victorian Planning System Ministerial Advisory Committee:

http://www.vlga.org.au/Resources/Library/Review_of_Victorias_Overall_Planning_System_Submission.aspx