

Submission via: [engage.vic.gov.au/adaptation-action-plans](https://engage.vic.gov.au/adaptation-action-plans)  
Also, via email to: [climate.change@deeca.vic.gov.au](mailto:climate.change@deeca.vic.gov.au)

15 July 2026

## RE: Consultation on Victoria's draft Adaptation Action Plans 2027–31

Thank you for providing the Heritage Council of Victoria with the opportunity to provide feedback on Victoria's draft Adaptation Action Plans 2027–31.

As the Minister for Planning notes in her introduction to the Heritage Council's *Strategic Plan 2026–30*, 'Heritage protection and adaptation ... plays a vital role in shaping vibrant and liveable cities, suburbs and towns'. Protecting heritage places from the increasingly complex challenges posed by climate change is one of the Heritage Council's priorities. It is important to communicate that heritage places have a role in combatting the climate crisis and assisting the Victorian Government to meet its climate commitments, especially in the areas of embodied energy, waste reduction, sustainable use of resources and the reduction of greenhouse gas emissions.

To do this effectively we need an aligned whole-of-government approach, clear and effective guidance, and skilled, knowledgeable practitioners able to meet community needs.

These draft adaptation action plans provide the ideal opportunity to deliver these essential requirements.

The Heritage Council's feedback, appended to this letter, offers proposed modifications to three of the draft adaptation action plans to reflect the Council's commitments to acknowledge heritage places that are culturally significant at world, national, state and local levels. As evidenced by the Minister's endorsement of the *Strategic Plan*, these objectives have been supported by the Victorian Government, which is committed to the conservation of cultural heritage, recognising our past goes hand in hand with creating opportunities for all Victorians to connect with, contribute to and benefit from it.

If you require any further information, or would like to discuss the feedback provided, we would be pleased to meet with you to discuss this important work. Please contact the Heritage Council Secretariat at [heritage.council@transport.vic.gov.au](mailto:heritage.council@transport.vic.gov.au) or by phone on (03) 8572 7949.

Yours sincerely,



**Prof Philip Goad**  
Chair, Heritage Council of Victoria

## 1.0 Introduction

The Heritage Council of Victoria (the Heritage Council) is an independent statutory body established under the *Heritage Act 2017* (the Heritage Act). It is the Victorian Government's primary decision-making body for the identification of places and objects of state-level cultural heritage significance. Under section 11 of the Heritage Act, the Heritage Council is charged with a wide range of functions. These include:

- advising the Minister [for Planning] on the status of the state's cultural heritage resources and on any steps necessary to protect and conserve them, under section 11(a)
- advising government departments and agencies, municipal councils and other responsible authorities on matters relating to the protection and conservation of cultural heritage, under section 11(d)
- initiating programs of research related to the identification, conservation or interpretation of cultural heritage, under section 11(f).

First Peoples' cultural heritage is protected under the *Aboriginal Heritage Act 2006* (Vic), through which the Victorian Aboriginal Heritage Council is formed and operates.

The Heritage Council acknowledges the Traditional Owners of the Country that we call Victoria, as the original custodians of Victoria's land and waters, and acknowledge the importance and significance of Aboriginal cultural heritage across the state. We honour Elders past and present whose knowledge and wisdom has ensured the continuation of Aboriginal culture and traditional practices.

The Council strongly supports measures to ensure the conservation of First Peoples' cultural heritage from the impacts of climate change, and the emphasis on First Peoples' cultural heritage across the draft adaptation action plans.

In this submission, references to 'heritage' or 'cultural heritage' primarily refer to the cultural heritage places and objects defined under the Heritage Act. However, these comments may also have relevance for cultural heritage places protected under other legislation.

## 2.0 General comments

Victoria's heritage sites contribute approximately \$2.4 billion each year towards the state's tourism industry and support around 185,000 jobs.

Yet, cultural heritage places and landscapes protected under the Heritage Act (and under the Heritage Overlay in local planning schemes) are some of the most vulnerable to the impacts of climate change. Nationally important places and state-significant heritage places include cultural landscapes (e.g. parks and botanical gardens), streetscapes, government and civic buildings, residences, infrastructure and engineering heritage (e.g. bridges, railways, water supply and reservoirs), maritime heritage (e.g. shipwrecks, ports and coastal infrastructure) and historical archaeological sites (e.g. gold mining, early buildings and townships). Victoria also has two World Heritage Sites – Budj Bim Cultural Landscape and the Royal Exhibition Building and Carlton Gardens – with other bids (Victorian Trades Hall and Victorian Goldfields) in progress.

Fires, floods, sea-level rise, droughts, increasing urban heat and more intense seasonal rainfall all have the potential to damage or even destroy these important cultural assets.

With the increasing frequency of natural disasters due to climate change, in recent years the Victorian Government has spent \$2 million in disaster recovery heritage grants to repair a selection of damaged places, including storm damage to the Walhalla Bandstand and Waller House in Ivanhoe, flood damage to Benalla's historic grandstand and Bendigo Pottery, and fire damage to Stony Creek timber trestle bridge in East Gippsland.

Hundreds of state-significant places will continue to be at direct risk: the iconic Brighton Beach boxes will be threatened by storm surges and sea-level rise; the Mount Buffalo Chalet will continue to face bushfires with increasing frequency; historic gardens – like Kyneton, Castlemaine and Ballarat Botanic Gardens – will continue to have stately trees damaged in extreme heat events and droughts; the Great Ocean Road will

continue to suffer damage from tidal surges causing coastal erosion; and government and civic buildings will continue to be damaged after storms and floods.

Yet, cultural heritage places are also essential to the broader agenda of sustainable development through the retention and conservation of existing materials and the embodied energy present in heritage buildings, parks, gardens and cultural landscapes. They combat extreme heat, cool down neighbourhoods, absorb flood runoff and help buffer the worst impacts of climate change, and make our communities safer.

They also contribute to the community's sense of identity and of place, qualities that help maintain resilient, cohesive communities, better equipped to collaborate and respond to climate change impacts.

Whole-of-government support for practical measures and guidance on how to adapt heritage places in a way that both preserves their heritage values and increases their resilience to climate change is essential. These adaptation action plans are an excellent mechanism to deliver this.

The current omission of any substantive reference to the cultural heritage protected under the Heritage Act (and Heritage Overlay) is therefore disappointing and an important gap that needs to be addressed by the final plans, in line with Victorian Government commitments.

The following comments are provided as constructive feedback to assist in improving three of the draft plans, and so necessarily focus on areas that, we suggest, require modification and clarification.

### 3.0 Built Environment Adaptation Action Plan (BEAAP)

The Heritage Council's *Strategic Plan 2026–30*, endorsed by the Minister for Planning, explains that cultural heritage conservation is an integral part of enabling the state's housing and development growth aspirations and in achieving the state's climate adaptation goals.

In comparison with the content of the previous *Built Environment Adaptation Plan 2022–26*, the draft BEAAP has limited (only two) references to cultural heritage places protected under the Heritage Act (and Heritage Overlay).

This is not only a missed opportunity, it does not reflect the Victorian Government's commitments to the recognised role heritage places have in combatting the climate crisis and assisting the Victorian Government to meet its climate obligations. This is especially so in the areas of embodied energy, waste reduction, sustainable use of resources and the reduction of greenhouse gas emissions.

'Building resilience' should include protecting and strengthening the built environment (in addition to the natural environment) for future generations through adaptation action plans. (This point should be reflected in the BEAAP as well as other action plans that use the same text on page 6).

Following are specific suggestions to further address this gap.

#### Risks and opportunities (page 11)

##### Risk

- **Risk 6:** If 'community amenities' refer to 'community, recreational, cultural and heritage places (including gardens)', it is considered this risk is too narrowly framed. Well beyond 'Reduced availability, access and enjoyment' is the complete loss and destruction of places and objects that are valued by, and are part of, a community's identity and legacy. For example, the 2009, 2019/20 and 2025/26 bushfires and the 2019 and 2022 floods all resulted in the complete alteration and obliteration of beloved places and landscapes. State-listed heritage places lost through these events included multiple timber and truss bridges (including those featured in regional rail trails), gold mining artefacts, forest watch towers and iconic mountain huts. Our World Heritage Sites should importantly be acknowledged and are no less susceptible to climate risk. We suggest the risk be amended with the additional words in red:

'Reduced availability, access and enjoyment of community amenities for Victorians, due to the loss, damage or reduced suitability of community, recreational, cultural and heritage places (including gardens), caused by the wide-ranging impacts of increasing extreme weather events and changing climate.'

- **Risk 8:** This addresses the point the Council is making with respect to First Peoples. However, the draft does not include the impacts to wellbeing and the sense of loss that other communities may feel regarding impacts to their own important and valued cultural heritage places, such as those that are protected under the Heritage Act (or indeed in the Heritage Overlay).
- Additionally, consider including a risk that implementation of climate change measures may result in unintended adverse impacts on the cultural heritage values of protected and recognised heritage places.

## Opportunity

### Opportunity A and B

- The opportunities would be strengthened by referring to:
  - the social and economic value of heritage, and how cultural heritage conservation is an integral part of enabling the Victorian Government's housing and development growth aspirations, and in achieving climate adaptation goals.
  - that existing buildings can be used and re-purposed, which in itself will contribute to climate adaptation and sustainability goals, including through embodied energy and building waste reduction.
- Furthermore, many heritage places – and the wider class of community amenities listed earlier – contribute relatively high areas of permeable surfaces and green infrastructure in urban environments. This can tangibly help buffer local residents from climate-related disaster impacts such as flash flooding, high winds, and extreme heat. So, an additional point could read:

‘Protection of existing community, recreational, cultural and heritage places (including gardens) with high ratios of permeable areas and green space has potential to ameliorate the local impact of climate change, including flash flooding, high winds and extreme heat.’

## Our current adaptation action (page 12)

- This section of the BEAAP focuses on new buildings, assets and services. However, it is important to also demonstrate how *existing* buildings can be used and re-purposed in climate resilience to contribute to climate adaptation and sustainability goals through embodied energy, avoided landfill and conservation of permeable spaces in built environments. This could be an addition to the last paragraph on this page.

## Actions (pages 15–17)

### Action 1

#### Embed climate risk in built environment decision-making processes to ensure government and development outcomes respond to current and future climate hazards (pages 15–16)

- The actions and priorities would be strengthened by:
  - adding an action to ‘integrate climate awareness, adaptation and mitigation in regulatory processes (including decision-making) relating to places and objects in the Victorian Heritage Register’.
  - with respect to the Victorian Government's *Asset Management Accountability Framework*, revising the framework:
    - to expand the stated outcomes (section 1.4 of the *Asset Management Accountability Framework*) to ‘improve the climate resilience of existing government assets including places of cultural heritage significance’
    - to expressly require service providers and government agencies to demonstrate how existing and future infrastructure and assets, including identified heritage places and objects, will be managed to respond to climate risk and emergencies such as fire, flood/inundation, storm events and emergency response preparedness and recovery.
  - adding a priority with respect to best-practice cultural heritage research, guidance and skills development, especially in the areas of sustainable design, climate resilience, and adaptive reuse.
- The ‘Whole of Victorian Government strategic land use planning policy toolkit’ is supported.

### Action 3

**Continue to review and prioritise emergency management initiatives which support improved recovery and reduce future exposures to climate hazards (page 16)**

- The actions and priorities would be strengthened by:
  - adding an action to support initiatives to ensure emergency service agencies have appropriate and available access to information/resources as to the location of local and state-significant heritage places (and First Peoples' places, as appropriate).

### Action 4

**Advocate to the Commonwealth Government for building reforms, insurance and infrastructure funding to strengthen all-hazard climate resilience across development, infrastructure, households and communities (page 17)**

- It is suggested that the first priority (changes to the objectives and standards in the National Construction Code) expressly not prejudice the re-use and adaptation of local and state-significant heritage places.

### Glossary (page 18)

We note that the BEAAP seems to use 'cultural heritage' when referring to First Peoples' cultural heritage places and 'heritage' or 'heritage assets' for other cultural heritage places. It would be helpful to add the terms 'cultural heritage' and 'heritage' to the Glossary and explain how these are used in the document. It also may be helpful to indicate the range of 'built environment' assets that these terms encompass, for example infrastructure, historical cultural landscapes, gardens, all buildings (including 'homes') and objects such as fountains, sculptures, statues etc. There were definitions in the previous BEAAP that could assist.

## 4.0 Education and Training Adaptation Action Plan (ETAAP)

### Risks and opportunities (page 11)

- A risk is the failure to not respond in a timely way to the ongoing loss in specialist trades and skills and associated training and career pathways for the protection and re-use of heritage places.
- An opportunity is to develop trades and skills in the areas of sustainable design, climate resilience, adaptive re-use tailored to identified heritage places.

### Actions (pages 16 & 18)

- Action 3 should be broadened to the private sector (including other education institutions), rather being confined to Government-owned education and training infrastructure
- Actions 3 and/or 5 could be strengthened to include 'best-practice cultural heritage research, guidance and skills development, especially in the areas of sustainable design, climate resilience and adaptive reuse'.

## 5.0 Natural Environment Adaptation Action Plan (NEAAP)

### System scope (page 7)

- It is suggested that 'System scope' would be strengthened by acknowledging 'Victoria's World Heritage Sites and cultural landscapes protected under the Heritage Act that have substantial natural features'. Examples include Victoria's two World Heritage Sites (Budj Bim and the Royal Exhibition Buildings and Carlton Gardens), many parts of the Victorian Goldfields (current World Heritage bid), and botanic gardens. This could be added after the third paragraph.
- Figure 4 refers to committees of management under the heading of 'Volunteers and community groups', but many are formally appointed under legislation by the Victorian Government, or its agencies/bodies;

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and many of the committees of management are local councils – it would be more accurate to incorporate a different category in the diagram.

### **Risks (page 13)**

- A risk is the destruction of or damage to cultural landscapes protected under the Heritage Act that have substantial natural features.

### **We are committed to further action (page 16)**

- Figure 8 could include consideration of the consequences of inaction.

### **Actions (page 17)**

- Action 2 could include an action to ‘Integrate climate awareness, adaptation and mitigation in regulatory processes (including decision-making) relating to places and objects in the Victorian Heritage Register’ (as also recommended for the BEAAP).

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*Heritage Council of Victoria*

*15 July 2026*