

16 March 2026

Resilience Planning Team
Department of Planning, Housing and Infrastructure
NSW Government

Via online portal: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/have-your-say-climate-change-and-natural-hazards-sepp>

Dear Resilience Planning Team

Draft Submission

RE: Climate Change and Natural Hazards State Environmental Planning Policy (SEPP)

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to the Climate Change and Natural Hazards SEPP consultation.

GBCA commends the NSW Government's leadership in seeking to introduce a clear, consistent framework for tackling current and future risks, including climate change and natural hazards (coastal hazards, flooding, bushfires, and urban heat), and rebuilding after natural disasters.

GBCA supports the proposals in the consultation documents in principle, and we agree that:

- NSW should adopt a consistent, future focused climate risk framework.
- Urban planning must avoid high risk areas while enabling resilient growth.

We also note that while planning policy has a critical role to play in improving the resilience of NSW communities and the built environment, this must be supported by appropriate regulation and tools to support greater resilience in building design and construction. Including future amendments and implementation of the National Construction Code.

About the GBCA

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system - Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- supporting and rewarding the development and use of sustainable products and materials
- contributing to market transformation and a sustainable economy.

The Green Star rating tools recognise that we are more reliant than ever on a range of interdependent assets. Our resilience can be disrupted because of climate change, as well as other externalities ranging from health pandemics to infrastructure failure. In the Green Star Buildings rating tool, credits within the Resilience category require projects to undertake an assessment of climate risks and rewards actions taken to mitigate risk and improve resilience.

NSW policy goals

GBCA is supportive of the proposed policy intent which seeks to:

- Introduce new guidelines for managing natural hazards and update existing natural hazards controls to streamline decision-making.
- Focus on climate risks, rebuilding after natural disasters, coastal hazards, flooding, bushfires and urban heat.
- Establish a consistent approach for assessing climate risk and natural hazards throughout development assessment.
- Provide an all-hazards approach to planning to ensure communities and developments are resilient to both current and future risks.
- Help consent authorities, such as local councils, assess climate and natural hazard risks for different development types and guide decisions based on acceptable risk levels.

Please see further comments below:

Planning for climate change

Section to come

Urban heat

The draft Urban Heat Policy sets out principles requiring planning authorities to:

- Consider urban heat early in the planning process.
- Encourage design and layout choices that support heat mitigation.
- Prioritise community health by ensuring thermally comfortable outdoor spaces.
- Ensure communal heat refuges exist and connect to evacuation networks.

Reducing the impact of developments on urban heat is a core priority of the Green Star Communities rating tool. The rating tool includes minimum requirements for activities that reduce heat, including passive shading on facades and selecting roof and pavement materials with high solar reflectance. Nature plays a critical role in urban resilience, including cooling. Projects are rewarded for committing to at least 40% tree canopy coverage across a precinct.

Both community-wide planning and building design are required to address urban heat and protect the wellbeing of people within the urban environment. GBCA supports the proposal to introduce the Urban Heat Policy to encourage greater consideration of urban heat in land use planning decisions.

Bush fire

GBCA supports the move to a risk-based framework that:

- Avoids placing higher vulnerability uses (e.g. aged care, schools, hospitals) in high-risk bush fire locations.
- Ensures areas planned for population growth improve evacuation capacity, resilience, and safety.
- Requires considering the impact of climate change on future bush fire behaviour.
- Takes a landscape scale view of cumulative bush fire risks.

GBCA supports the proposed application of streamlined bush fire risk assessments for urban release areas.

Coastal

As noted in the consultation document, development is focused in coastal areas, with 85% of the NSW population living or working within 50km of the coast.

The built environment is particularly vulnerable because the homes, schools, hospitals and workplaces constructed today will still be standing as hazards worsen. Resilient, low carbon, climate ready buildings are essential to managing risks such as coastal flooding and sea level rise.

Planning decisions, infrastructure provision and adaptation financing are also important for reducing future vulnerability of new developments and making calls on where to protect and where to retreat as climate hazards risk escalates.

GBCA supports using the NSW coastal erosion and inundation hazards and exposure assessment (DCCEE, 2025) as the basis for Coastal Vulnerability Area mapping across the state.

Flooding

The NSW Government has committed to stop inappropriate development on dangerous floodplains and has delivered reforms that have improved the ability to consider and manage flood risk. The proposals in this consultation are to consolidate natural hazards provisions and increase the availability of flood-prone land mapping. GBCA supports these initiatives.

Housing

It is inarguable that NSW needs more housing across the state. The three major initiatives identified to support increased supply are:

- Transport Oriented Development (TOD) Program
- Low and Mid-Rise reforms
- NSW Pattern Book for standardised housing typologies.

Housing must be delivered in the right locations, meaning areas not excessively exposed to climate risks (flooding, bushfire, coastal hazards, urban heat). This includes avoiding placing new homes in high-risk areas like dangerous floodplains. Future rebuilds after disasters should be delivered to improve resilience rather than reproduce vulnerability.

Ensuring that housing development is not approved for areas exposed to high hazards can be matched with planning to ensure abundant development capacity. It will mean that public and private infrastructure planning needs to enable and facilitate development in areas that will be safe and sustainable. Councils will need adequate support to incorporate climate modelling into their planning tools and processes.

GBCA welcomes the opportunity for further discussion. To arrange a meeting or for additional clarification of the points made above, please do not hesitate to contact Corwin Wallens, Policy Manager, via email at corwin.wallens@gbca.gov.au

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