

16th August 2021

Infrastructure Victoria Project Team
Email: enquiries@infrastructurevictoria.com.au

Re: Towards 2050: Gas infrastructure in a zero emissions economy

We write with regard to the *Towards 2050: Gas infrastructure in a zero emissions economy Interim Report*. The Council Alliance for Sustainable Built Environment (CASBE) welcomes the opportunity to provide the following feedback on State Governments' Interim report. We also welcome the opportunity to play a role in the transition to a gas-free built environment.

CASBE BACKGROUND

[CASBE](#) is a collaborative alliance of Victorian councils committed to the creation of a sustainable built environment within and beyond their municipalities. CASBE provides a forum for the exchange of information and ideas on innovation and best practice in Environmentally Sustainable Development (ESD). Our local, ground-up approach has resulted in collaborative local government led action and broad scale positive change to Victoria's built environment and a significant reduction to its consequent environmental impacts, including the impact of energy use. CASBE [members](#) include 38 Victorian councils representing over 70% of Victoria's population.

CASBE's focus is on applying widely accepted ESD principles to the built environment through the Victorian statutory planning system. CASBE has developed the Built Environment Sustainability Scorecard ([BESS](#)) - an online tool for assessing the sustainability of development proposals at planning stage. BESS provides a consistent assessment methodology for CASBE's Sustainable Design Assessment in the Planning Process ([SDAPP](#)) Framework – a methodology adopted by numerous Victorian Councils to enable a consistent assessment of sustainability commitments in new development across participating councils.

CASBE is focused primarily on new and retrofitted development in the built environment. Typical sustainability commitments from developers include improved energy performance outcomes beyond base National Construction Code (NCC) requirements, based on passive design measures such as passive heating and cooling, natural ventilation and climate responsive design.

One of CASBE's current strategic goals is to 'Elevate environmental standards for new development'. CASBE has been progressing work in this area and have recently facilitated a [joint council project](#) to progress work on resilient and zero-carbon buildings and urban places.

We provide for your internal use only, the following DRAFT energy planning policy *Objectives* and *Standards*. These are the energy component of the joint council project mentioned above.

Draft Energy Objectives (applicable to the transition to zero emissions):

- *To deliver development that produces net-zero carbon emissions, through:*
 - *Optimised passive design to deliver an energy efficient building envelope*
 - *Maximised energy efficiency standard of all appliances, systems and lighting.*
 - **No fossil fuel consumption onsite, such as natural gas or LPG.**
 - *Maximised onsite renewable energy generation.*
 - *Residual electricity demand purchasing from local and/or offsite renewable energy generation.*

Draft Energy Standards (applicable to the transition to zero emissions):

- *A Net-zero carbon performance from all operational energy use must be achieved through a combination of measures.*
- **No natural gas or other onsite fossil fuel consumption is permitted.**
- *Only electric cooktops and ovens can be installed.*
- *Maximise onsite renewable energy generation to meet or exceed predicted annual energy use.*
- *All residual operational energy to be 100% renewable purchased through offsite Green Power, power purchasing agreement or similar.*
- *Design to enable for future renewable energy battery storage including space allocation.*

CASBE's position on energy is that:

All new buildings are to be carbon positive, as soon as possible.

Given this position, we support Scenario A as proposed by the Interim report. We provide the following comments regarding this scenario:

- Some of the measures put forward in the other scenarios may be achieved as the interim transition targets i.e. 28-33% emission reduction by 2025 achieved through limited gas use and partial electrification, and 45-50% by 2030 with use of alternatives like green hydrogen with carbon offsets and Carbon capture and storage (CCS) of remaining emissions resulting from pre-closure of fossil fuel power stations. However, as the goal is net zero emissions by 2050, there is no room for even partial use of fossil fuels by this date, which is implied in Scenarios B, C & D.
- We note that the interim targets should also allow enough time to consider consumer and indeed industry behaviour change and adaptation during the transition.
- Energy efficient and secure systems that supply longer-term affordable and reliable electricity to households and businesses should be supported via increased provision of rebates and grants to retrofit existing building, as well as incentivise fully electric new building and infrastructure projects.

- As outlined in the Report, there are many local and international case studies that provide concrete examples of successful gas-free infrastructure initiatives. Renewable energy, alternative technologies and innovative resource and infrastructure [re-]use are already well underway or established. These are viable paths for the Victorian context and we encourage further support from state government and industry to investigate these options.
- We strongly recommend no further introduction or re-instating of gas exploration, drilling or extraction from this point forward. This is a direct contradiction to Victoria's net zero emissions targets as per the *Victorian Climate Change Act 2017*.

We provide the following specific comments regarding the use of gas in buildings:

- CASBE councils, through the SDAPP Framework and the application of ESD requirements through local planning policy, have been working with the development industry for more than a decade encouraging improved energy efficiency outcomes. This has been supported by clear energy expectations in the BESS tool. BESS requires a preliminary building energy rating (NatHERS / FirstRate5 assessment) to assist in optimising design for passive heating and cooling when addressing Thermal comfort & performance. BESS uses the envelop performance combined with the selection of a specific energy rating of various appliance types to calculate whole of house energy consumption and greenhouse emissions. The outcomes are assessed against a baseline energy consumption. This assessment of energy performance has increased the energy literacy of the mainstream development industry, and by association, an understanding of the value of electrification. To the point where a number of our member councils are now seeing development applicants voluntarily seeking zero carbon outcomes.
- Climate Emergency declarations & plans
With a growing number of Victorian Councils pledging to climate change agreements (under the Climate change Act 2017) more than 32 councils have now adopted Climate Emergency Plans. Commitments include such targets as to:
 - electrify all of Council's buildings,
 - be powered by 100% renewable electricity with **no use of gas by 2030** and
 - future proofing buildings for electric charging infrastructure.
- **There is now an opportunity for the Victorian government to raise the bar for the whole sector and accelerate gas substitution in new developments. This can be achieved by state and other local governments introducing consistent zero carbon (gas-free) planning policy.**

CASBE supports a 'no regrets' transition to decarbonising the gas sector, that requires swift implementation of fossil-free, zero emission, energy efficient, electrification and thermally robust buildings that ensure consumer security and accessibility.

Please contact me if you wish to discuss this matter further on [REDACTED] or [REDACTED]
Yours sincerely

[REDACTED]
CASBE [REDACTED]

Notes:

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CASBE is auspiced by the Municipal Association of Victorian (MAV). This submission is made on behalf of CASBE member councils and the views represented in this submission do not necessarily represent the views of the MAV. While this paper aims to broadly reflect the views of CASBE member councils, CASBE has a diverse mix of member councils and the views represented in this submission do not necessarily represent the views of all CASBE members individually.

Individual councils may also respond to issues specific to, and on behalf of, their communities.

The CASBE staff thanks and acknowledges the contribution of those who have provided their comments and advice in the development of this submission.