Good Shepherd
Australia New Zealand

Submission to the Inquiry into Climate Resilience

Legislative Council Environment and Planning Committee, Parliament of Victoria

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About Good Shepherd Australia New Zealand

The Sisters of Good Shepherd was established in France over 400 years ago to respond to the needs of women and girls. We are now the largest, longest running organisation supporting women and girls, located in 73 countries, and with consultative status on women and girls at the UN. We provide programs and services that support women, girls, and their families to be strong, safe, well, and connected. Our clients are at the centre of what we do. We are focused on responding to their emerging needs and on providing innovative, locally tailored responses. Our services are complemented by research, advocacy, and policy development that address the underlying structural causes of injustice and inequality to pave a way for a better tomorrow.

Executive summary

Good Shepherd Australia New Zealand welcomes the opportunity to contribute to the Victorian Inquiry into Climate Resilience. We commend the Inquiry's focus on the risks facing Victoria's built environment and infrastructure from climate change, and the impacts these risks will have on the people of Victoria.

Climate health and justice is a focus of Good Shepherd's 2023-2027 strategic plan. Climate change is increasingly shaping the lives of the women and families we work with in our family violence, child and family, and financial services. Using the No Interest Loan client base as a proxy (~40,000 clients), around 70% of our clients are social or private renters. Landlords are failing to provide climate-safe homes. This drives up energy bills, and has disproportionate health consequences for women and children, who are more vulnerable to the health impacts of extreme heat, and climate change-related mould outbreaks.

Faced with low incomes and extremely constrained housing options due to family violence, our clients are also being pushed into more dangerous places in the context of climate change, such as hotter suburbs and disaster-prone places.

We commend the Victorian Government for taking some important first steps towards climate resilience in the built environment, including the introduction of a basic rental standards regime in 2021, the Energy Efficiency in Social Housing program, and various co-financing programs for home retrofits and appliances, such as the successful Solar Homes program.

In this submission we set out how the Victorian Government can build on these foundations by:

- immediately implementing the expanded minimum rental standards regime currently under consultation, to support good health and lower bills
- retrofitting more social housing homes
- exploring the feasibility of a government-administered insurance pool
- expanding heat protection and cooling equity strategies at local levels
- taking a gender lens to disaster resilience planning.

Ultimately, climate resilience requires mitigation of climate change itself. The best resilience strategies will involve both decarbonisation and adaptation measures wherever possible (for example, via housing electrification, energy efficiency and climate resilience retrofits). Everyone should be supported to live in homes and places that contribute to health, financial wellbeing, and safe climate missions.

Recommendations

Governance of climate change risks in the built environment

Recommendation 1: Pursue new governance structures that make addressing and adapting to climate change (including in the built environment) the mission and responsibility of all parts of the Victorian Government.

Climate-resilient housing

Recommendation 2: Immediately implement minimum rental standards for climate resilience, consistent with the Victorian Government's proposed reforms under the draft Residential Tenancies and Residential Tenancies (Rooming House Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations 2024.

Recommendation 3: Determine holistic housing standards for climate resilience and apply these to an expanded minimum rental standards regime.

Recommendation 4: Fund the Victorian Rental Taskforce beyond the initial $4m investment to ensure rental standards for climate resilience are enforced.

Recommendation 5: Expand the 'Energy Efficiency in Social Housing Program' to improve the climate resilience of Victoria's social housing.

Recommendation 6: Consider how government co-financing programs for energy efficiency and climate resilience can be reinvigorated, streamlined and enhanced, to reach low-income homeowners and renters.

Recommendation 7: Ensure women and children can access efficient appliances for climate resilience, financial independence, health and safety under Victoria's family violence Flexible Support Package scheme.

Recommendation 8: Explore the feasibility of a government-administered insurance pool that provides a minimum and affordable level of insurance coverage to all Victorian homes, including those in higher-risk locations.

Climate-resilient places

Recommendation 9: Work with local governments to expand heat protection and cooling equity strategies across Victoria, including the appointment of chief heat officers.

Recommendation 10: Introduce heat protection and cooling equity requirements into Victorian planning and other relevant legislation, to ensure 'green infrastructure' and heat protections are routinely integrated into urban planning across Melbourne and regional Victoria, including new developments.

Recommendation 11: Undertake a gender analysis of disaster infrastructure measures, and give equal weight to social infrastructure such as childcare and housing for women and children in disaster resilience planning.

Recommendation 12: Enhance rental security of tenure and affordability protections so renters can build enduring community connections and collective resilience.

Recommendation 13: Optimise place-based community services to build climate resilience.

Governance of climate change risks in the built environment

This section addresses item (a) in the Terms of Reference in relation to the risks facing Victoria's built environment and infrastructure from climate change, and the impact these risks will have on Victorians.

Climate change poses severe risks to the built environment, particularly our homes and the places we live. This has a significant impact on Good Shepherd's clients across two key domains: health, and financial hardship and wellbeing.

Health

Good housing is a vital social determinant of health during climate change, and should provide a refuge from harms such as severe heat (Maller and Strengers 2011; Friel 2022). In Australia, heat causes more injuries and deaths than any other extreme weather event, including bushfires, rain and storms (AIHW 2023a).

There is a well-established link between health outcomes and housing quality and thermal protectiveness (see the overview in Halloran and Sved 2024). Poor-quality housing causes physical discomfort in the heat and can exacerbate chronic health conditions such as heart disease, diabetes, and mental health disorders (Nicholls et al 2017). One Melbourne study found that residents of homes with very low energy ratings (0.9 stars) were exposed to extreme heat stress conditions for almost 25 hours during the 2009 Melbourne heatwave (one of Melbourne's worst on record) while residents of homes with moderate energy ratings (5.4 stars) were exposed to 6 hours of extreme heat stress conditions (Alam et al 2016).

ACOSS's 2024 summer heat survey (ACOSS 2024a) revealed that nearly half of the Victorians surveyed (46%) said their home gets too hot and they struggle to cool it. Most of the survey population comprised women (66%), people receiving income support (66%), and people living in private or social rental housing (55%). Hard-to-cool homes also have indirect health effects when people have to sacrifice essentials in order to keep high energy bills paid. Many people in the ACOSS survey reported that high energy bills made it more difficult to pay for health essentials like nutritious food (47%) and medicine (41%).

Good Shepherd is primarily concerned with the health and wellbeing of women and families during severe heat, and the lack of protection provided by poor-quality housing. Extreme heat poses particular dangers to the health of pregnant women, children, older women, and women with chronic health conditions or disability (Maller and Strengers 2011). Good Shepherd practitioners report that heat-related distress can compromise children's emotional self-regulation and wellbeing, and especially affect neurodiverse children and children with disability.

The link between cold homes and poor health is also well-established. Studies in the UK, New Zealand and Australia show that cold homes impair adult and child health by increasing the risk of respiratory and cardiovascular problems, and mental ill-health (see, for example, Howden-Chapman et al 2021; Singh et al 2022; Donkin and Marmot 2024). Cold homes are a climate resilience issue, insofar as homes with low energy efficiency require greater use of the fossil fuels that still dominate our energy system. Homes without solar are less affordable to run in winter, and do not enjoy the large summer bill savings that reduce annual energy bills and make adequate energy use for good health more affordable year-round.

Mouldy homes are another health risk in the context of climate change. Mould is a frequently reported issue among Good Shepherd's clients, including in connection with extreme rainfall, floods and storms. Mould can also arise in damp, cold homes with a lack of insulation, affordable heating, and other measures for good energy performance. Mouldy housing can cause respiratory and cardiovascular illness, and children living in mouldy homes are more likely to suffer asthma, wheeze and allergies (Bentley et al 2023). In Australia, the health cost of mouldy and damp housing is estimated to be three times that of sugary drinks, but does not receive nearly the same public attention (Bentley and Baker 2020).

For Good Shepherd's clients, climate-related health risks in the built environment also arise from the places people live. For example, Good Shepherd works with families in two of Victoria's worst urban heat islands – the Cities of Melton and Brimbank. Exposure to more intense heat in Melbourne's western suburbs exacerbates pre-existing health vulnerabilities in these suburbs, including higher rates of chronic disease such as diabetes (Dunn et al 2022).

Financial hardship and wellbeing

Beyond the health impacts, inadequate housing has financial impacts amid climate change that detract from financial wellbeing. Hard-to-cool housing is expensive. Energy-inefficient housing is a major cause of energy affordability

stress, alongside low incomes and high energy prices (Bryant et al 2022). Social and private renters are more affected by energy affordability stress than homeowners, partly because their housing is less energy efficient (VCOSS 2018).

There are also financial ramifications when living in places more exposed to climate extremes. Good Shepherd practitioners report that clients are facing higher insurance costs due to disaster risks, and higher daily living costs in a post-disaster context (for example, when food and housing is scarce). Climate-related disasters are displacing people from their homes, particularly renters (Li et al 2023), who then face the cost of re-establishing their homes and lives elsewhere. Uninsured families have to source new household belongings from community organisations or use credit such as No Interest Loans to buy household essentials. Disasters such as bushfires significantly affect people's likelihood of experiencing multiple, costly legal problems, including in relation to housing, employment, debt and money, family law and family violence, and government payments (Balmer et al 2023).

Financial costs can also be higher in hotter locations. For example, Good Shepherd practitioners report that clients' energy bills are higher in places more exposed to heat and humidity extremes (in some cases, energy debt totals $10,000 or more).

A mission-based approach to climate change governance

The causes and consequences of climate change sit across multiple policy areas. Victoria's mitigation of climate change, and our adaptation via the built environment and other systems, must be the responsibility of all parts of government. New governance structures are needed to tackle the complex, interconnected social and environmental challenges posed by climate change. Traditional policy-making structures based on fragmented and individual portfolios are not fit for limiting global heating to the safest level now possible (Larrue 2022); that is, a 1.5°C increase above pre-industrial temperatures.

A mission-oriented approach to governance is required, which involves:

- setting a clear strategic orientation and objectives
- policy coordination across different portfolios, public authorities and policy fields (for example, energy, housing, health, transport, and industry) to achieve collectively agreed objectives

- coordinated policy implementation – often this involves building upon and coordinating pre-existing policy interventions, rather than inventing new ones (see Mazzucato 2017; Larrue 2022).

The European Union, for example, is taking a mission-oriented approach to managing and adapting to climate change risks (European Commission 2024). In the United States, the 'Justice40' initiative mandates that at least 40% of the benefits of numerous federal investments in climate change action must flow to disadvantaged communities, including renewable energy and sustainable housing investments. Justice40 is a whole-of-government approach jointly led by key federal agencies and the newly formed White House Environmental Justice Advisory Council, which provides independent advice to government on how to address current and historic environmental/climate injustices (White House n.d.).

This kind of governance approach appreciates the opportunities to pursue improved health, financial wellbeing and broader social justice via climate change mitigation and adaptation measures. We know, for example, that housing interventions to improve energy efficiency and thermal protections result in better health, and health budget savings. An example is the Victorian Healthy Homes program, which delivered relatively minor energy efficiency and thermal comfort upgrades to 1000 homes of low-income Victorians with a health or social care need. The intervention was found to be cost-saving for government within 3 years, with savings largely found in healthcare. For every $1 saved in energy expenditure, $10 was saved in healthcare costs (Sustainability Victoria 2022). Housing retrofits in New Zealand and the UK similarly evidence or forecast substantial savings in health budgets (see Howden-Chapman et al 2022; Donkin and Marmot 2024).

Recommendation 1: Pursue new governance structures that make addressing and adapting to climate change (including in the built environment) the mission and responsibility of all parts of the Victorian Government.

Climate-resilient housing

This section addresses Terms of Reference (b), (c) and (e) in relation to housing – a vital form of built environment for climate resilience.

Our clients' homes should be a sanctuary and resource amid climate change impacts such as heatwaves and very hot days, intense rainfall and floods, longer fire seasons and more extreme fire danger days, and overall reduced rainfall and water availability. In practice, our clients' homes tend to be grossly unprepared for climate change. These homes are also missed opportunities for decarbonisation and cost-of-living savings. All Victorians, regardless of income, should be supported to live in homes that contribute to the decarbonisation and safe climate mission.

We suggest five priorities for climate-resilient housing:

1. Holistic rental housing standards for climate resilience
2. An expanded social housing retrofit program
3. Reinvigorated household financial support
4. Enhanced family violence Flexible Support Packages
5. A new insurance model for climate-resilient housing

Holistic rental housing standards for climate resilience

Women and families are among the least likely to live in climate-resilient homes because of their high level of reliance on social and private rental housing. Rental housing is much less equipped to cope with heat than owned housing (Daniel et al 2020), more likely to be mouldy (Bentley et al 2023), and more vulnerable to damage in disasters (Li et al 2023).

At Good Shepherd, social and private renters feature across our family violence and financial wellbeing programs, and make up the majority (69%) of No Interest Loan (NILs) clients (36.3% are public renters and 32.4% are private renters). Women, who make up the majority of NILs clients, are particularly likely to rent: 72% of women using NILs are renters, with 38.2% living in public rentals, and 33.5% living in private rentals.

In the wider Australian population:

- women comprise 62% of renters in social housing (AIHW 2023b)

- female sole parents aged 25-34 years, who tend to have young children in their care, are heavily reliant on rental housing: 57% are private renters and 12% are social renters. This compares with 50% and 6%, respectively, of male sole parents in this age group (Stone et al 2024)
- across all age groups, 36% of female sole parents are private renters and 9% are social renters (compared with 33% and 5%, respectively, of male sole parents) (Stone et al 2024).

The social and private rental homes of Good Shepherd's clients lack fundamental features that would make them more climate resilient, as outlined below.

Heat protections

Good Shepherd practitioners report that their clients typically live in homes without adequate heat protection and energy efficiency measures to reduce the cost of thermal health and comfort. This includes a lack of insulation, adequate window coverings, efficient reverse-cycle cooling/heating systems, proper ventilation, and lower-cost cooling methods like fans, trees, and external shading. Inadequate space in overcrowded homes is another factor, including for young parents on low incomes and women and children escaping family violence, who often have very constrained housing options. Overcrowding increases heat in homes and makes it much harder to cool down (Dudley 2022).

Mould protections

Mould risks in homes are a sleeper issue, and are under-recognised in Victoria's climate resilience policies. In 2023, Good Shepherd conducted focus groups with its practitioners across Victoria, South Australia, New South Wales and Queensland, to explore the impacts of climate change on our clients. Mould was raised in nearly every focus group discussion. Mould problems are connected with more general rental housing deficiencies, such as roof and plumbing defects (Bentley and Li 2022), and a lack of mould remediation obligations on landlords. Climate change is only increasing the vulnerability of rental housing to mould damage due to the increased frequency and severity of floods and intense rainfall (BOM 2024).

Good Shepherd practitioners are assisting clients who face extensive mould damage to homes following climate events like floods. NILs are used to replace essential household items contaminated by mould, including children's items. However, mould can spread to these newly purchased goods if mould remediation is not required of landlords/housing providers.

Electrification/no gas

Good Shepherd's Victorian clients are highly exposed to exorbitant gas prices, as residents of the State with the highest gas use (around 80% of Victorian households have gas connections). In turn, the Victorian families we work with are most exposed to the health risks of gas. Gas cookers are estimated to be responsible for up to 12% of Australia's childhood asthma burden, creating risks comparable to household cigarette smoke (Bambrick et al 2021). Our clients are nowhere close to enjoying the benefits of healthier, more affordable all-electric homes, as they tend to live in social and private rental housing where gas hot water, cooking, and heating systems are less likely to be replaced (the current heating minimum standard for rental properties permits gas heaters).

Onsite energy generation

Good Shepherd's clients are generally shut out of household solar, especially as social and private renters. Around 1 in 3 Australian households have solar (Clean Energy Council 2024), yet solar tends to be tied to homeownership. As of 2019-20, only 4.7% of social renters and 5.8% of private renters had solar, compared with 30% of homeowners (ABS 2022). These figures are unlikely to have increased significantly given the barriers to solar uptake in rentals. A lack of onsite energy generation means our clients are less able to affordably cool their homes during heat events, and enjoy the health benefits and cost savings of more affordable energy year-round. A lack of household solar also has wider implications for climate-resilient housing. For example, onsite solar makes it more affordable to run a reverse-cycle cooling/heating system in order to prevent and manage mould damage.

Rental standards reform is unfinished business

We congratulate the Victorian Government for its national leadership on rental reform, including the introduction of minimum standards in 2021. However, the current standards regime is limited to very basic housing features for climate resilience, including structural soundness and weatherproofing; a requirement that housing be free from mould relating to the building structure; rudimentary ventilation standards; and energy-efficient fixed heating in the main living area.

These standards need to be significantly expanded to protect Victorian renters against climate change. A comprehensive standards regime is the only viable pathway to climate-resilient rental housing, given the well-recognised split-incentive that gives landlords little impetus to invest in housing improvements that do not directly benefit them (Daniel et al 2020). A standards regime helps to

overcome the power and resource imbalance that prevents individual residents advocating for climate-resilience measures on a house-by-house basis. A standards regime also removes the potential for premium pricing of rental housing that is cheaper to run and more climate resilient. No Victorian should be priced out of protective housing amid climate change.

As a first step, we strongly support the expanded minimum standards proposed by the Victorian Government, including ceiling insulation, energy-efficient fixed cooling and heating systems, draughtproofing, and end-of-life replacement of existing hot water systems with efficient hot water systems. These standards are fundamental for improving renters' health and financial wellbeing, and decarbonising Victoria's built environment.

The next step is for the Victorian Government to determine holistic housing standards for climate resilience and apply these to rental housing. A comprehensive standards regime would consider:

- multiple, interconnected climate change events such as heat, fires, floods and intense rainfall, and associated risks such as mould
- opportunities for climate resilience, health benefits and financial savings from lower-cost measures such as ceiling fans and external shading
- a household solar standard for rental housing, given rapidly declining household solar installation costs in Australia (IRENA 2022) and the cost-of-living savings available via onsite energy generation.

Mandated solar for rental housing (where feasible in terms of dwelling type, orientation and so on) should be on the Victorian Government's agenda now. Preparatory scoping should begin so a household solar standard can be efficiently implemented when an appropriate price point is reached. While we acknowledge initiatives such as solar rebates for rental providers under the Victorian Solar Homes program, this scheme is voluntary and relies on active, altruistic engagement from landlords, or self-advocacy by tenants and a potential co-payment, the returns from which are uncertain and complex.

In determining holistic housing standards for climate resilience, the Victorian Government should draw upon the expertise of climate change, housing, energy, and health professionals.

Recommendation 2: Immediately implement minimum rental standards for climate resilience, consistent with the Victorian Government's proposed reforms under the draft Residential Tenancies and Residential Tenancies (Rooming House

Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations 2024.

Recommendation 3: Determine holistic housing standards for climate resilience and apply these to an expanded minimum rental standards regime.

Climate change demands strong rental standards enforcement

A standards regime needs to be backed by robust oversight, compliance and enforcement measures, that remove the burden of standards enforcement from individual renters and their advocates. At Good Shepherd, our family violence, family services and other specialist practitioners are having to spend considerable casework time advocating for their clients' rental homes to be brought up to a basic standard.

In a more efficient and equitable system, government would take on this role and systemically investigate standards non-compliance. In this respect, we welcome the Victorian Government's recent establishment of a Rental Taskforce within Consumer Affairs Victoria, to investigate breaches of Victorian rental laws including standards non-compliance. The Taskforce's role will only become more vital in the context of climate change, given breaches of climate-resilience standards may have severe ramifications for people's health and financial wellbeing. We recommend the Rental Taskforce be funded beyond the Victorian Government's initial $4m investment, to ensure Victorian renters and their children are provided with the climate change protections they deserve.

Recommendation 4: Fund the Victorian Rental Taskforce beyond the initial $4m investment to ensure rental standards for climate resilience are enforced.

Expanded social housing retrofit program

We recognise that new social housing in Victoria is being built to a 7-star energy performance standard (the mandatory standard for all newly built Victorian homes from 1 May 2024). We also recognise planning policy changes mean new social housing homes will be all-electric from January 2024. These new homes have the potential to enhance the health and financial wellbeing of residents and their families, particularly women, who have a high reliance on social housing. The Victorian Government needs to ensure that new social housing homes maximise opportunities for strong energy performance (beyond the 7-star standard), sustainability, and climate resilience in the face of heat, intense rainfall and other climate extremes.

Alongside new builds, the Victorian Government can take a stronger leadership role in supporting climate-resilience retrofits of existing social housing. The 'Energy Efficiency in Social Housing Program' is already supporting energy efficiency upgrades of existing public and community housing, but this program could be expanded beyond the current commitment of ~$110m to upgrade 35,000 social housing homes. The Victorian Government should pursue an expanded retrofit program that improves the climate resilience of more social housing homes. This should be co-funded by the Australian Government under an expanded Household Energy Upgrades Fund, which was established in the May 2023 Federal Budget ($300m allocated for co-investment with the States and Territories to improve the energy efficiency of social housing).

An expanded retrofit program should include existing program measures such as efficient reverse-cycle heating/cooing systems, heat-pump hot water systems, gap-sealing and insulation. However, it should also encompass broader climate-resilience features informed by the standards review suggested in recommendation 3 above, including household solar. Social housing has significant untapped energy generation potential, which would support household health and financial wellbeing and wider energy system decarbonisation (Roberts et al 2021).

There is broad consensus across social and industry sectors that government financing should prioritise social housing upgrades in order to improve the overall energy performance and climate resilience of Australia's housing stock. By prioritising social housing, governments can build economies of scale and market capacity. In turn, this reduces the cost of all climate-resilience retrofits, including those carried out by private owners and subsidised by government (see ACOSS 2024b). An expanded social housing retrofit program would also harness the significant embodied energy of Victoria's existing social housing, and avoid the carbon emissions and costs of new builds (consistent with DELWP 2022).

Recommendation 5: Expand the 'Energy Efficiency in Social Housing Program' to improve the climate resilience of Victoria's social housing.

Reinvigorated household financial support

A household financial support scheme is a vital component of any climate-resilient housing agenda. It would complement a rental housing standards regime, and government-funded upgrades of social housing. A project as monumental as the energy transition and climate change adaptation necessitates financial support for households.

An enduring, large-scale scheme is necessary to ensure all Victorians, especially low-income renters and homeowners, enjoy:

- the cost-of-living savings flowing from electrification, energy efficiency, onsite energy generation, and other sustainability measures for climate resilience
- the health benefits of housing with thermal protections against heat and cold (as discussed above) and measures for broader climate resilience.

These benefits at the household level would mean reduced government expenditure on health (as discussed above) and in areas such as energy concessions. Concessions are applied on a percentage-of-bill basis in Victoria, and therefore lower energy bills mean lower concessions spending.

A financial support scheme should reach renters who cannot afford climate-resilience measures that sit outside a comprehensive rental standards regime; for example, energy-efficient whitegoods and other freestanding appliances.

A financial support scheme is also necessary for mortgage-holders/homeowners on low and moderate incomes who cannot afford to fully fund climate-resilience measures. In Good Shepherd's NILs program, for example, we see evidence of financial need among homeowners: 8% of clients are homeowners (either with or without a mortgage) and meet the criteria for NILs access. In the wider population, poverty among Victorian mortgage-holders has increased by a third since 2016, from 9% to 12%. Poverty among mortgage-holders is concentrated in Melbourne's northern, western and south-eastern suburbs (VCOSS 2023).

Household essentials, including whitegoods, are one of the main items purchased under Good Shepherd's NILs program, at 35% of all loans. Common appliance types include cooling and heating systems, clothes dryers, fridges, washing machines, and hot water systems, all of which have significant energy implications and provide opportunities for greater efficiency, lower emissions and energy bills, and improved health and comfort. On rare occasions, NILs have been

used for water tanks, insulation and household solar. NILs are also used for less 'obvious' climate-resilience measures, like blinds/curtains for thermal protection.

Harness the benefits of past and present programs

Several financial support/co-financing programs are currently operating in Victoria – or have ended – creating complexity, confusion and gaps. The Solar Homes program is successfully supporting household solar uptake, particularly by families in outer Melbourne suburbs such as Tarneit, Craigieburn and Cranbourne, and regional areas such as Shepparton (Premier of Victoria 2023). Co-financed heat-pump hot water systems are another welcome feature of this program; however, we query who is able to access these appliances in practice due to the co-payments required. Meanwhile, the Home Heating and Cooling Upgrades program has ended. This valuable program delivered co-financed, efficient reverse-cycle heating/cooling systems to low-income households. There appears to be no replacement program on the horizon.

Given the Victorian Government has committed to a review of the Victorian Energy Upgrades program under the 2024-25 State Budget, it should consider how co-financing programs for energy efficiency and climate resilience can be reinvigorated, streamlined and enhanced, to ensure climate-resilience measures better reach low-income homeowners and renters. Households on the lowest incomes, who cannot afford any kind of co-payment, should receive fully funded appliance/retrofit measures.

We know from our NILs program at Good Shepherd that government co-financing better allows low-income families to purchase appliances for energy efficiency and climate resilience. NILs clients are supported to choose energy- and water-efficient appliances wherever possible, but these appliances often have a higher upfront price. Given the majority of NILs clients are on low social security incomes, the purchase of energy- and water-efficient appliances can therefore be impossible. Good Shepherd's experience with previous programs shows that government co-financing is effective, allowing the replacement of inefficient old appliances and the purchase of new appliances with lower running costs. For example, the NSW Government's former appliance replacement scheme provided co-financing alongside a No Interest Loan.

This type of scheme is likely to deliver net cost savings. Based on previous initiatives such as the Victorian Healthy Homes program, the cost savings of these types of interventions far exceed initial expenditure, and in a short space of time. Savings are heavily weighted towards healthcare (see Sustainability Victoria

2022). Government co-financing also supports Victoria's energy and electrification transition and a 75-80% lowering of emissions by 2035, as the Victorian Solar Homes program shows.

Recommendation 6: Consider how government co-financing programs for energy efficiency and climate resilience can be reinvigorated, streamlined and enhanced, to reach low-income homeowners and renters.

Enhanced family violence Flexible Support Packages

The need for climate resilient housing is an under-recognised issue affecting family violence victim-survivors.

Housing with good energy efficiency and affordable appliances means lower energy bills, which promotes financial security and independence among women and children re-establishing their homes and lives.

Climate resilient housing with thermal protections also supports the health and wellbeing of family violence survivors, including in circumstances where violence has resulted in chronic injury or illness. For example, 40% of family violence victims attending Victorian hospitals over a 10-year period had sustained a brain injury. Among children, 25% had sustained a brain injury (Gabbe et al 2018). Brain injury can cause thermoregulation, fatigue and cognitive difficulties that are exacerbated by hot weather. Housing with heat protections is therefore important in these circumstances.

Heat protection and cooling needs can also intersect with survivors' safety needs. For example, women are unlikely to leave windows and doors open for cooling if there is a threat of the perpetrator entering the home, and may therefore be reliant on other cooling methods, such as fans and affordable cooling systems.

Good Shepherd practitioners are also observing that inadequate housing amid climate change can make family violence recovery more difficult for the women and children they work with, as the case study below shows.

Kiara's* story (caution: this story contains a description of family violence)

Kiara lives in Melbourne's western suburbs and is a mum to a primary school-aged daughter, Sienna. Sienna was born with intellectual and physical disabilities. Kiara and Sienna were both abused by Kiara's former partner. This included extreme forms of violence such as threats involving weapons, pouring petrol around the house, and the killing of Sienna's pet. Because of the high risk of homicide to Kiara and Sienna they were relocated to a refuge, and then into transitional housing after the refuge stay.

Sienna experienced post-traumatic stress disorder as a result of the violence, and struggled to communicate her trauma in non-verbal ways. She was very distressed, and struggled to settle into her new school. The transitional housing was in very poor condition, with no heating, cooling or insulation, and had large gaps where the cold and hot air came in. When the Good Shepherd practitioner visited in the summer, the house was extremely hot. The practitioner perceived that the heat exacerbated Sienna's distress, and made it more difficult for her to engage in NDIS therapies.

Despite the impact of the heat, the transitional housing provider refused to provide air-conditioning. Good Shepherd therefore applied for an air-conditioner under Victoria's Flexible Support Package scheme, which assists family violence victim-survivors to move out of crisis, stabilise their lives, and improve their safety, wellbeing and independence. The application for an air-conditioner was denied, on the basis it was a luxury or discretionary item.

*Name changed to respect confidentiality

In other cases, Good Shepherd practitioners have supported family violence survivors to find the most efficient heaters, whitegoods and other appliances that will lower their energy bills over the long-run, but clients struggle with the higher upfront cost of more efficient appliances. This is especially the case when family violence survivors have competing needs, like home security measures, that have to be prioritised and funded through Flexible Support Package funding.

The Victorian Government should take two steps from here. One is to ensure that appliances for thermal protection (like air-conditioners) and energy efficiency are not considered luxury or discretionary items under the Flexible Support Package scheme, and are approved for funding. Appliances such as these can directly support women and children's financial independence, and their health, safety and wellbeing needs, especially in the context of climate change.

The second step is to deliver subsidies to family violence survivors under the Flexible Support Package scheme, that would better allow women to purchase efficient heating/cooling appliances and whitegoods. In the current regulatory environment where inefficient appliances are still permitted to be produced and sold, efficient appliances attract a premium. This disadvantages family violence survivors in situations of acute need. There is accordingly a role for government in supporting women and children with the cost of efficient appliances for financial independence, health and safety reasons. This would also mean that Flexible Support Package funding could be spent on appliances that support Victoria's emission reduction goals.

Recommendation 7: Ensure women and children can access efficient appliances for climate resilience, financial independence, health and safety under Victoria's family violence Flexible Support Package scheme.

A new insurance model for climate-resilient housing

Climate-resilient housing is not just about the standard and condition of housing, but its protection in climate-related disasters, via some form of insurance. Adequate home insurance is becoming increasingly unaffordable for Good Shepherd's client cohort. This affects both homeowners and renters; for example, when a landlord does not have adequate insurance to remediate a rental property, or insurance coverage for tenant relocation costs.

In the year to March 2023, median home insurance premiums increased by 28%, and by 50% for the highest risk homes (Paddam et al 2023). Across Australia, 1.24 million households (or 12% of all households) face home insurance affordability stress; that is, where they have to pay more than four weeks' gross household income towards home insurance premiums. Affordability pressures are much worse in high-risk regions (Paddam et al 2023). The story below illustrates these pressures. Good Shepherd heard this story when undertaking an insurance feasibility study in South Australia (the recommendations are detailed below).

Michelle's story

Michelle lives in a town along the Murray River, due to its proximity to medical facilities. Michelle has a neuro-degenerative disease. She worked in human services prior to becoming unwell and unable to work. Her house is now her only asset, and her only source of income is the Disability Support Pension. Michelle is proud that she was able to buy her own home. She insures her home as it is her only asset and she wishes for the capital to be used for her funeral, and to provide for her family. Unfortunately, she cannot afford the insurance premiums given her limited income, so has been using her superannuation to pay for insurance. However, her superannuation is running out and she does not know how she will pay for the next insurance renewal, given the cost.

Good Shepherd is starting to hear that insurance is being withdrawn from some very high risk areas, or that exceptionally high premiums result in effective withdrawal. By 2030 it is estimated that 2.6% of properties in Victoria will be uninsurable, comprising just under 96,000 properties. The Victorian electorate of Indi is one of the top 10 Australian electorates most exposed to uninsurability, with 11% of properties estimated to be uninsurable by 2030 (Hutley et al 2022).

The private insurance model is therefore breaking down amid climate change. Unaffordability is becoming more pervasive, and price signals (in the form of high insurance premiums) cannot be acted on if people cannot afford to move to lower-risk locations. This leaves Victorians stranded in high-risk locations without the protection of insurance, which can result in severe financial distress, little to no means of recovery, and potential homelessness after disasters.

In light of these growing pressures, Good Shepherd joined with the consultancy 'Think Human' to propose a new model, which would comprise an insurance pool administered by government (report available on request). In essence, the model recognises the inequity and impracticality of a purely private insurance model in the context of climate change. Private insurers are moving away from risk pooling; that is, where the premiums of lower-risk customers cross-subsidise those of higher-risk customers. Instead, insurance premiums are increasingly based on individual household risk, which severely disadvantages people who can only afford to live in higher-risk places.

The proposed model would create a new insurance pool for all homeowners in a State (in this case, South Australia), including strata housing and caravan park residents. All homeowners would be required to pay into the pool, including landlords. To ensure equity, premiums could potentially be based on the ratable

value of properties. The pool would be complemented by built environment mitigation measures, to reduce pooled risk and premiums over time. The pool would insure the first $100,000 of risk against hazards such as floods, storms and fires, and provide an additional resilience payment of $20,000 for building mitigation measures. Renters in affected properties would be provided with payments to help pay for temporary accommodation, a bond in a new rental home, and other re-establishment costs. Beyond the $100,000 cap, private insurance coverage would be required. The new insurance pool would therefore provide a minimum level of insurance coverage, including for those who cannot afford any level of coverage at present and into the future.

We recommend the Victorian Government gets on the front foot and investigates the feasibility of a similar insurance pool in Victoria, given the increasing frequency and severity of climate-related disasters such as floods, and the growing unaffordability of insurance for a range of Victorians. It is in all Victorians' interests for disaster risks to be pooled to some extent. A collective approach would protect households on low and moderate incomes in higher-risk locations. It would also promote the ongoing viability and prosperity of the regional economies and communities on which all Victorians depend, for food production, manufacturing, recreation/tourism, and much of our energy supply.

Recommendation 8: Explore the feasibility of a government-administered insurance pool that provides a minimum and affordable level of insurance coverage to all Victorian homes, including those in higher-risk locations.

Climate-resilient places

This section addresses Terms of Reference (b), (c), (d) and (e) in relation to urban and regional places and community-scale infrastructure. These are critical dimensions of the built environment for climate resilience (DELWP 2022).

Similar to housing, our clients' communities should be a sanctuary and resource amid climate change. Place-based climate resilience is vital to sustain community engagement, including participation in work, caring and education during heat events and other climate extremes. Place-based climate resilience also builds equity, by taking a less individualised approach to climate change adaptation. For example, free, cool public spaces provide an alternative sanctuary for women and families whose homes are currently unsafe or too costly to run during extreme heat.

We suggest four priorities for climate-resilient places:

1. Heat protection and cooling equity in Victorian neighbourhoods
2. A gendered lens on disaster resilience infrastructure
3. Housing stability for community-level disaster resilience
4. Place-based community services for climate resilience

Heat protection and cooling equity in Victorian neighbourhoods

Good Shepherd clients are living in excessively hot places in Victoria, including Melbourne's western suburbs. It is well-known that the western suburbs disproportionately suffer amid overall rising temperatures because of the urban heat island effect (Latham 2023; Dunn et al 2022); that is, the temperature difference caused by unsustainable urban design features like a lack of tree canopy and other vegetation, excessive roads, and dark roofs.

Good Shepherd works with women and families in two of Melbourne's worst urban heat islands – the Cities of Brimbank and Melton – where average land surface temperatures are almost 11 degrees higher than a non-urban baseline (Sun et al 2019). There is a class divide in the cooling capacity of our neighbourhoods. In Melbourne, the distribution of green space favours more affluent communities where house and rent prices are higher. There are lower concentrations of low-income households in greener areas (Sharifi et al 2021). This divide is very obvious

to Good Shepherd's practitioners, with one observing that for the families she works with in Melbourne's west, it's a 'luxury to have green space around and be able to have places to run'.

Urban green spaces (for example, parks) and blue spaces (for example, coasts, lakes and rivers) are important social determinants of health during climate change. They provide an escape from homes that are not thermally comfortable or safe. Green, cooled neighbourhoods reduce people's exposure to heat when getting to school, work and services, shopping, and going about other essential activities in their communities (WHO 2023). Green and blue spaces also enable physical activity, including in hotter weather. Children's development is impaired if they cannot access cool spaces such as shaded playgrounds in their neighbourhoods, where they can extend play time and avoid burn injuries from hot playground equipment and floor surfaces (Pfautsch et al 2022).

Green and blue spaces also support good mental health by reducing harms (such as the mental stress of heat), building capacities such as social interaction, and restoring capacities (such as enabling stress recovery). Access to these spaces allows nature-based health interventions or 'social prescribing' (WHO 2023). Some Good Shepherd practitioners report that the hot neighbourhoods of their clients, and a lack of access to green spaces, can restrict therapeutic options for their clients that involve physical activity and immersion in nature in local communities.

Good Shepherd's practitioners also report well-known urban design failures that make their clients' communities much less climate-resilient. This includes car dependency in suburbs and regional towns poorly served by public transport, and a lack of transport infrastructure that protects against heat, such as shaded bus stops. Our practitioners also report a lack of free, cool public spaces where families can retreat on hot days. Instead, families have to visit commercial spaces such as shopping centres, which are designed to encourage spending. The Brimbank Aquatic and Leisure Centre – where Good Shepherd has onsite services – is an example of a community space that can act as a refuge during extreme heat with the right supports (for example, free entry and transport connections). The facility itself is a world-leading, climate-sensitive development, being one of Australia's first zero-emission aquatic centres, with no use of carbon offsets (DCCEEW 2024).

We welcome various local government strategies that are addressing cooling inequities across Victorian neighbourhoods. This includes Brimbank City Council's Climate Emergency Plan 2020-2025 and associated strategies such as 'Heat Safe

Spaces' planning, and the Urban Forest Strategy to expand tree canopy coverage from 6.2% to 30% over the next 30 years. We also welcome the overarching 'Greening the West' strategy supported by the Victorian Government.

The Victorian Government should work with local governments to expand these strategies across Victoria, including innovative measures such as chief heat officers. The City of Melbourne is the first place in Australia to appoint a chief heat officer, joining cities such as Miami, Athens, Santiago and Freetown. These cities' chief heat officers have all been women to date, and have had a focus on the gendered impacts of heat extremes in the cities under their care. Chief heat officers manage heat risks at a local level, by monitoring heat, trialing innovative cooling methods, and creating heat refuges for citizens. The work of chief heat officers draws upon place-based understandings of the local environment and social needs (Walls 2022).

Recommendation 9: Work with local governments to expand heat protection and cooling equity strategies across Victoria, including the appointment of chief heat officers.

At an overarching level, the Victorian Government should also introduce heat protection and cooling equity requirements into Victorian planning and other relevant legislation, to ensure 'green infrastructure' and heat resilience measures are routinely integrated into urban planning across Melbourne and regional Victoria, including in new developments.

Elsewhere in the world, governments are starting to provide a legislative footing for heat equity. For example, New York City recently introduced legislation that requires their Office of Emergency Management and other agencies to develop a cooling and communication plan to ensure residents are protected on extreme heat days, including via access to cool spaces (see New York City Council n.d.).

Recommendation 10: Introduce heat protection and cooling equity requirements into Victorian planning and other relevant legislation, to ensure 'green infrastructure' and heat protections are routinely integrated into urban planning across Melbourne and regional Victoria, including new developments.

A gendered lens on disaster resilience infrastructure

Place-based infrastructure that defends against the impacts of floods, fires, storms and intense rainfall should be part of any climate resilience scheme. However, the current focus in Victoria's adaptation action plans (for example, DELWP 2022) is on traditional physical infrastructure such as flood-reduction measures; protections for telecommunications and energy systems; and measures for transport and supply-chain continuity. Much less emphasis is given to social infrastructure such as childcare, community facilities, and housing – especially women and children's housing needs during and following disasters.

Several Good Shepherd practitioners who worked in post-disaster financial recovery programs observed that disasters exacerbate pre-existing childcare shortages in regional areas. Childcare is not prioritised in pre- or post-disaster infrastructure building. A lack of childcare prevents women from taking up the paid work they need following disasters and restoring their incomes. The income impacts of disasters play out in gendered ways, and are only just beginning to be understood. For example, bushfires tend to increase the availability of jobs in male-dominated industries (for example, transport), and reduce women's employment in female-dominated industries (for example, retail services) (Hickson and Marshan 2022). The 2009 Black Saturday fires were associated with persistent income losses for women in the short- and medium-terms, due to women's disproportionate exposure to part-time work in tourism-related industries (Ulubasoglu and Onder 2020). Given these gendered income impacts, childcare is a fundamental form of social infrastructure for promoting women's income-earning and financial resilience, both prior to and post-disaster.

Women also have unique housing needs in disasters and their aftermath. Good Shepherd practitioners are observing links between family violence and disasters, such as the extensive Queensland floods in 2022, and Victorian disasters in recent years, including the Black Summer fires. These observations are consistent with research on the 2009 Black Saturday fires, which found an association between fires and new and increased family violence (Parkinson 2019; Gibbs et al 2020). Disasters severely constrain emergency and alternative housing options for women and children experiencing family violence. Venues such as motels, which are often used as emergency accommodation in family violence situations, are co-opted during disasters for a different set of emergency needs. Given that some women and children will be victims of both types of emergencies, infrastructure for climate resilience should ensure sufficient temporary housing is available for overlapping crisis needs in disasters.

We recommend the Victorian Government undertakes a gender analysis of disaster infrastructure measures, and gives equal weight to social infrastructure such as childcare and housing for women and children in resilience planning.

Recommendation 11: Undertake a gender analysis of disaster infrastructure measures, and give equal weight to social infrastructure such as childcare and housing for women and children in disaster resilience planning.

Housing stability for community-level disaster resilience

It is increasingly recognised that collective resilience and social preparedness at the community scale is imperative for disaster resilience. People in well-prepared communities with strong connections tend to do better in disasters than those who are not connected to any community support (Hilbrink 2023). Social preparedness means:

> 'fostering a sense of collective responsibility and building strong social networks that can support response and recovery efforts… Whole communities can enhance their resilience and ability to recover from disasters by leveraging the strengths of their social connections, support systems and collective resources' (Hilbrink 2023).

We are concerned that renters are less able to build and benefit from this collective resilience because of insecure tenure, unaffordable rent increases, and other factors driving frequent moves. Although the Victorian Government has abolished 'no grounds' evictions, our clients face considerable rental insecurity and instability in practice. This is reflected in population-level data. In 2019-20, just under a third (29%) of private renters had spent less than one year in their current home, and 52% had spent less than 5 years. By contrast, homeowners moved much less frequently: only 5% had spent less than one year in their current home, and 23% had spent less than 5 years (ABS 2022).

Rental instability continues after disasters. Emerging research indicates that renters are most at risk of housing displacement and face the majority of forced moves after disasters, due to eviction, unavailable rental homes, or rent arrears. Forced moves are connected with a lack of renter rights (Li et al 2023). Housing tenure security is a determinant of post-disaster recovery (Li et al 2023).

Families who are regularly moving between rental homes will find it harder to build enduring community connections and collective disaster resilience. The

Victorian Government should therefore consider rental tenure and affordability protections as climate resilience measures. These protections should be enhanced in Victoria so renters can maintain connections to place and build collective resilience in the face of fires, floods, and severe storms.

Recommendation 12: Enhance rental security of tenure and affordability protections so renters can build enduring community connections and collective resilience.

Place-based community services for climate resilience

Trusted, established community organisations are fundamental for climate-resilient places. Victoria's social services ecosystem has unique relationships with people, places and communities. This is a precious resource in the face of climate change and its localised impacts. Community sector services should be carefully deployed, adequately funded, and centrally coordinated and orchestrated in the context of climate change. An optimised ecosystem would include the following elements.

A holistic approach to climate resilience

Climate resilience means preparing for multiple, interrelated climate change impacts on our homes and places, whether that's 'everyday' impacts like heat, or large-scale disasters. It also means integrated support across a range of service domains, such as energy support; housing retrofits; family violence services; financial counselling; tenancy and housing law; insurance law; and mental health services (see the National Disaster Mental Health and Wellbeing Framework: National Mental Health Commission 2023). This support should be delivered by specialist organisations in a coordinated and cohesive way, and integrated at a place-based level wherever possible.

Navigation and advice services

Permanent navigation and advice services would help people access the existing Victorian and Australian Government financial supports available to build climate resilience in their homes and places, including assistance with energy bills, appliance replacement, and government disaster payments. Advice services can also leverage undersubscribed programs, such as the federal Home Equity Access Scheme. This program could be better used by low-income, homeowning

Age Pension recipients to safely draw upon their home equity to fund household solar installation and energy efficiency measures for health and lower bills.

Rolling funding for climate resilience

Community sector funding arrangements need to take account of the frequency, scale and severity of climate change impacts like heat and disasters, and the consequences for the built environment. Rolling funding is required to build community resilience to disasters and other climate-related events.

Funding arrangements also need to accommodate the long tail of recovery. Communities can require recovery assistance for 5-10 years or more after a fire, flood, storm or other event. In addition, preparedness and recovery phases are merging because disasters are becoming more frequent. Funding and services design need to take account of this new paradigm, to build resilience to multiple events that may occur in close succession.

Build the community sector's capacity to respond to climate trauma

While some community sector practitioners are already expert in trauma-informed practice in other domains (such as family violence), climate change is causing particular types of trauma that are under-recognised and not always well understood. For example, there is limited cross-sector understanding of child and family experiences of disasters and how trauma is experienced by children and young people in this context (see Emerging Minds 2024). Given that climate change impacts are increasingly interwoven into our everyday lives, community sector practitioners should be equipped to understand, anticipate, and respond to climate-related trauma.

Recommendation 13: Optimise place-based community services to build climate resilience.

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