

17 November 2013

Dear Sir/Madam,

RE: THE CITY PLAN – DRAFT PLAN: COMMENT ON THE DISCUSSION PAPERS

Thank you for the opportunity to provide comment on *The City Plan – Discussion Papers*. The Green Building Council of Australia (GBCA) believes that an integrated approach to planning for our buildings, infrastructure, transport networks and communities is essential if the Canberra region and its city centre is to maintain and improve its productivity, liveability and sustainability well into the future.

The GBCA applauds the ACT Government's preparation of a plan that endeavours to create a "single over-arching strategic framework that sets a clear plan for the [city] centre into the future." A strategy that outlines areas for development and growth, considers how to integrate public transport, residential buildings and the amenities and services residents utilise, will ensure that infrastructure and major projects are delivered in the right areas efficiently, effectively and sustainably. We believe that taking an holistic approach and applying 'joined-up thinking' is essential in order to achieve the best outcomes whether for a building, community, city or region.

About the GBCA

The GBCA is Australia's leading authority on green buildings and communities, established in 2002 to develop a sustainable property industry in Australia and drive the adoption of green building practices. The GBCA promotes green building programs, technologies, design practices and processes, and operates Australia's only national voluntary comprehensive sustainability rating system for buildings and communities - Green Star.

The GBCA has more than 750 member organisations, including government departments, which work together to support the Council and its activities. The GBCA is also a founding member of the World Green Building Council (WorldGBC), which was established to provide a federated 'union' of national green building councils with a common goal to support the sustainable transformation of the global property industry; there are now 98 such councils worldwide.

The City Plan

The ACT Government has already shown remarkable leadership and commitment to sustainability with its policy 'Weathering the Change' and in particular, we applaud the ACT Government's goal for ACT schools to be carbon neutral by 2017. We believe that *The City Plan* represents another valuable opportunity to demonstrate the ACT Government's leadership through a commitment to provide a vibrant, productive and connected city, which also enhances the health and well-being of the community and its connection with the natural environment.

The City Plan identifies a number of key initiatives and the five discussion papers ask a number of questions to help shape the future of the city. These key initiatives broadly fall into the following objectives;

- ensure that the City's identity, functions and growth meet future needs
- ensure ease of access to the City and transport convenience, whilst finding alternatives to the car as the population grows
- Plan for growth and consider areas of opportunity for people to live and work in the City
- identify ways in which the public realm and sustainability be improved.

Along with these objectives, *The City Plan* also identifies that cities are dynamic environments and the need to consider previous and ongoing development when making further plans for the future. These objectives closely align with the five practice principles of the GBCA's Green Star – Communities National Framework (detailed later in this submission).

The GBCA believes these objectives will facilitate a growing population, whilst also providing a diverse range of affordable housing in desirable locations, jobs growth, access to public transport, infrastructure and a healthy and vibrant community. However, success will be determined by how the objectives and key initiatives outlined in *The City Plan* are implemented and integrated.

Government has a responsibility to provide visionary leadership, in particular by setting contemporary benchmarks and rigorous standards. The GBCA believes it is vital that sustainable development principles are considered during the earliest stages of planning in order to achieve the best long-term outcomes for communities and cities. The GBCA recommends that *The City Plan* and all of its future iterations consider sustainability benchmarks that can provide a useful method of measurement and support best-practice outcomes within the built environment.

The work that the GBCA has done in collaboration with government and industry to build a rating tool for sustainable communities can provide the framework within which better-planned and better-designed communities can be delivered and progress measured, based on holistic principles and best-practice benchmarks.

Green Star rating tools

Green Star is a voluntary tool that encourages, recognises and rewards best practice and innovation. The first Green Star rating tool was released in 2003 in response to market demand for a rating tool that would evaluate the environmental design and construction of buildings as well as establishing a common language for green buildings.

There are currently ten Green Star rating tools which address a range of building types and over 630 projects have achieved Green Star certification across Australia, with a further 480 projects registered. The Green Star rating system is designed to take an holistic approach within each class and building sector, addressing nine categories in total: Management, Indoor Environment Quality (IEQ), Energy, Transport, Water, Materials, Land Use and Ecology, Emissions and Innovation. With over 630 projects delivered and certified, Green Star has a proven track record when it comes to implementation of efficient, healthy and productive green buildings.

The ACT now has over 45 certified Green Star projects within the ACT, some examples of 'World Leading' 6 Star rated projects include:

- Gold Creek Primary School – Environment Centre
- NewActon Nishi Building
- Frank Fenner Building
- CIT Sustainable Skills Training Hub

Green Star – Communities

In 2009, the GBCA commenced work, in consultation with industry and all levels of government, on the development of a rating tool for sustainable development projects on a community scale; examining issues of economic, social and environmental importance. The Land Development Agency (LDA) and ACT-based Rock Development Group have been key supporters and of the Green Star – Communities rating tool along with all government land organisations and sponsors from local government, the Australian Government and industry.

The first step in developing the Green Star – Communities rating tool was to develop a national framework consisting of five best practice principles:

- Enhance liveability
- Create opportunities for economic prosperity
- Foster environmental responsibility
- Embrace design excellence
- Demonstrate visionary leadership and strong governance.

Stage 2 of the project involved establishing best practice benchmarks and metrics for assessing and certifying sustainable communities. A set of 38 credits was then developed and tested on a number of projects across Australia. The Green Star – Communities PILOT rating tool was launched in June 2012 and a number of projects are registered as part in the pilot phase. A copy of the Green Star – Communities National Framework and a guide to the credits can be found on the GBCA website at: <http://www.gbca.org.au/green-star/green-star-communities/>

The GBCA believes that Green Star – Communities can assist the ACT Government achieve its vision for *The City Plan* in two key ways.

Firstly, the ACT Government can reference Green Star – Communities in its planning protocols and encourage use of the rating tool for development projects and precincts throughout the territory. Referencing Green Star – Communities can help to enable ‘joined-up’ thinking and align current development projects within *The City Plan* by providing a common language and a set of best practice benchmarks. Several local developers and the LDA are already realising the potential of the Green Star rating tools to assist them with the planning of their development projects. The LDA, Rock Development Group as well as The Riverview Group have declared their involvement in the Green Star – Communities rating tool PILOT for the Lawson, Loop and West Belconnen developments respectively. The GBCA has also had discussions with the Economic Development & Environment and Sustainable Development Directorates about the applicability of using the Green Star – Communities rating tool for the City to the Lake project. The GBCA believes the City to the Lake project a good candidate for participating in the Green Star – Communities rating tool PILOT process and would encourage the ACT Government to explore this opportunity further.

The LDA has demonstrated remarkable commitment to Green Star – Communities as a sponsor and contributor. It is vital that the ACT Government capitalises on the investment of knowledge and resources made by the LDA and developers such as Rock Development Group and takes the opportunity to integrate the outcomes of the rating tool development process into documents such as *The City Plan* and other planning documents.

Secondly, the GBCA encourages the ACT Government to consider how the Green Star – Communities Framework and the credits within the rating tool can assist in developing strategies and setting measurable targets for future iterations of *The City Plan*. The Green Star – Communities framework, with its five overarching principles that look beyond just environmental sustainability to consider the other impacts critical to delivering sustainable communities – such as governance, economic prosperity, liveability and a considered approach to overall community design - can assist in setting practical, high-level planning direction, while the credits in the rating tool provide guidance and measurable best practice benchmarks. The credits have been developed with extensive industry and government collaboration and tested on a number of projects.

Several examples of how the credits can be used to provide guidance and benchmarks are detailed below:

Discussion paper 1: The role of the city

The purpose of the *Design* category within the Green Star – Communities rating tool is to encourage sustainable urbanism through best practice planning and design practices. It seeks to create places for people by encouraging ‘smart’ growth which is compact, connected and people-focused and, where possible, located on previously developed land.

The Green Star – Communities *Des-2 Site and Context Analysis* credit encourages comprehensive analysis of the geographic context and characteristics of the site at different levels during the planning and design phase. This category also recognises projects that undertake site planning processes designed to facilitate sustainable urbanism.

The Green Star – Communities rating tool encourages an integrated approach to providing housing that also takes into account a range of issues such as access to amenities, access to education and employment opportunities, and energy efficiency. Housing affordability strategies recognised under the *Econ-5 Affordability* credit include:

- Providing a range of lot sizes to support housing diversity, and a mix of densities with increased density near activity centres
- Providing a proportion of housing lots and dwellings to the market at an affordable price purchase price for low- to moderate-income households
- Provision of key worker housing
- Provision of a program for guaranteeing the supply of shared equity and/or social housing within the development
- Establishing partnerships between organisations to ensure allocation and delivery of affordable housing stock.

Discussion paper 2: Transport and movement

Cities and communities are economic hubs of activity and opportunity. Connectivity between the regional areas and suburban communities of the ACT with the city centre and key infrastructure such as the Canberra Airport is important for the flow of information, ideas, goods and services.

The *Env-11 Transport* credit requires an Integrated Transport Plan (ITP) to be developed for each project which sets out how various forms of transport will be integrated with land use. An ITP should encourage sustainable transport outcomes, particularly the existing and future public transport network and planning and provisions for active transport.

There are a number of other considerations captured under Green Star – Communities that will contribute to more efficient provision of transport. As well as smart planning and design of precincts and communities, demand-side factors can help to ease pressure on transport networks at peak times and contribute to greater efficiencies. All of the Green Star rating tools aim to highlight the relationships between our built environment and transport solutions.

The *Econ-7 Digital Economy* credit encourages developments to deliver infrastructure that will enable efficient remote working facilities, best practice enterprise connectivity and the highest standards of wireless connectivity. These sorts of technologies will assist Canberra to start on a long-term shift towards more flexible working arrangements, which also has a positive effect upon traffic congestion.

Green Star – Communities includes credits such as *Liv-3 Healthy and Active Living*, *Liv-5 Safe Places* and *Liv-7 Accessibility and Adaptability* which provide a range of benchmarks for equitable access. The GBCA recognises that there are many factors that need to be considered if equitable access to a great lifestyle can be achieved for everyone in our community. The Green Star – Communities rating tool can further support this aim through a number of the credits previously outlined which focus on affordability and improving access to transport as well as economic and education opportunities.

Discussion paper 3: Growth in the city

The Green Star – Communities rating tool recognises that affordability encompasses a range of factors. As such, it rewards projects that integrate mass transit options - so that people are not stuck in their cars for hours each day. It rewards connections to employment and education facilities - so that people may work and learn locally. And it rewards access to local amenities – so that people have a vibrant, liveable and ultimately affordable community at their doorsteps.

In one example, the *Econ-3 Return on Investment* credit encourages an holistic cost-benefit analysis that addresses indirect and intangible costs and benefits to the developer and community to ensure long term productivity, health and social and environmental issues are captured as well as core costs and benefits.

The economic resilience of a community can be achieved through creating diverse employment opportunities that meet the needs and demands of local and regional communities and facilitating access to them. The *Econ-1 Employment and Economic Resilience* credit requires a project to demonstrate that it is likely to have a net gain on existing employment opportunities in the local area.

Discussion paper 4: Public realm and design

Good urban design is that which enables the creation of coherent urban structures and connectivity between places. Urban design must take into account the needs and desires of a community and provide effective connectivity between transport, communication, social and physical infrastructure systems. The Des-4 Urban Design credit seeks to encourage and recognise projects that apply world-class urban designs practices to their developments.

The Green Star – Communities rating tool contains an Environment category that aims to reduce the impact of urban development on sensitive ecosystems. It encourages resource management and efficiency by promoting infrastructure, transport, and buildings, with reduced ecological footprints. The Environment category seeks to reduce the impacts of developments on land, water and the atmosphere. Projects are rewarded where they protect, value and restore natural and cultural environments within the community. The promotion of biodiversity and the reduction of greenhouse gas emissions and contamination to water and land are also rewarded.

Although Discussion paper 4 states that the ACT Government will endeavour to provide the people of the ACT with “environmentally responsible” and “environmentally responsible buildings and infrastructure” the GBCA would like to see a deeper focus around climate adaptation and resilience. Australia is increasingly exposed to extreme weather events and natural disasters. In particular, bushfires are significant risk for Canberra and its surrounding region and within the city centre itself, resilience to risks such as extreme heat or storm events should be considered. It is important that we do all we can to protect and restore our natural environment as well as ensuring that our built environment is more adaptable to a changing climate and more resilient to natural hazards. The *Gov-6 Adaptation and Resilience* credit specifies the development of a Climate Adaptation Plan and a Community Resilience Plan to identify threats and facilitate faster recovery, when or if disaster strikes.

Effective engagement is necessary for the development of a vision that is shared by stakeholders across the community, industry, and government. To progress successfully towards such a vision, a project must build community capacity, assess performance, and encourage ownership and leadership in the realisation of goals and objectives. The *Gov-4 Engagement* credit rewards projects that can demonstrate the preparation, implementation and ongoing review of a stakeholder engagement strategy. Projects are further rewarded when evidence can be provided that a project's vision has been developed through engagement with the community.

Strong leadership is essential if we are to tackle challenges such as economic growth, health and productivity, sustainable population growth, climate change, affordable housing and infrastructure planning. Governments must consider whole-of-community and whole-of-city approaches to planning to provide people with greater access to information, resources, and employment and learning opportunities as well as delivering better outcomes for the environment.

The GBCA welcomes the opportunity to work more closely with the ACT Government to discuss how Green Star – Communities can help to further inform the *The City Plan* and contribute to better outcomes for the city, the region and its current and future communities. Please do not hesitate to contact me via email at daniel.hartin@gbca.org.au or by phone on 02 8239 6200, should you require any further information or to arrange further consultation.

Yours sincerely,

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