

1 August 2013

Draft City Plan
Brisbane City Council
GPO Box 1434
BRISBANE QLD 4001

Via email: newcityplan@brisbane.qld.gov.au

Dear Sir or Madam,

RE: Brisbane City Council Draft City Plan

Thank you for the opportunity to provide comment on Brisbane City Council's draft City Plan. The GBCA commends Brisbane City Council for its draft City Plan interactive mapping program. This mapping program will make it easier for home owners and industry to determine codes and overlays applicable to their property or piece of land.

The GBCA understands Brisbane City Council, through the City Plan, is attempting to prepare for long-term growth in Brisbane. The GBCA advocates for a balanced approach to growth, given this, the GBCA has three recommendations to ensure Brisbane City Council, through the City Plan and supporting policies and initiatives, encourages new development in Brisbane to meet best practice sustainable outcomes.

About the GBCA

The GBCA is the nation's authority on sustainable buildings, communities and cities. Our mission is to accelerate the transformation of Australia's built environment into one that is healthy, liveable, productive, resilient and sustainable. We work together with industry and government – including long-term and forward-thinking GBCA member organisations such as Brisbane City Council – to encourage policies and programs that support our mission. We educate thousands of people each year on how to design and deliver sustainable outcomes for our buildings, communities and cities. And we operate Australia's only national, voluntary, holistic rating system for sustainable buildings and communities - Green Star.

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 97 such councils worldwide, and Australia plays a leading role both worldwide and around the Asia Pacific.

The Green Star rating tools

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

There are currently 10 Green Star rating tools which address a range of building types and over 600 projects have now achieved Green Star certification across Australia, with a further 391 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, Water, Materials, Land Use and Ecology, Emissions, Innovation and Transport; and defining 'best practice' in each.

Green Star – Communities rating tool

In 2008, government and industry, including Brisbane City Council, and all the state government land organisations sponsored the GBCA to draw upon existing knowledge and international neighbourhood rating tools to develop benchmarks that would enable Australian communities to be assessed and rated in the areas of:

- Governance
- Urban Design
- Liveability
- Economic Prosperity
- Environmental Sustainability and
- Innovation.

In 2012, after an extensive 18-month consultation process, the GBCA completed this task and released the Green Star – Communities rating tool. With the release of this rating tool, for the first time in Australia, community-scale development projects can be independently assessed as having achieved Best Practice (4 Star), Australian Excellence (5 Star) or World Leadership (6 Star).

For local governments across Australia, this rating tool and the benchmarks that sit within it provide a wealth of knowledge. The rating tool enables councils to informally benchmark and set goals for neighbourhoods in their jurisdiction, to informally assess masterplans put forward by private developers, and to certify community-scale development projects council is undertaking on land that it owns and over which it has control.

Recommendations

The GBCA advocates for a coordinated approach to raising standards in the planning, design, and construction of the built environment so that all parts of the community have the best possible opportunity to access healthy, efficient, prosperous and liveable places and spaces.

The GBCA has three recommendations on the draft City Plan, which are as follows:

1. Review the Green Star – Communities rating tool to identify the ways in which it can inform acceptable outcomes for the City Plan and internal council assessment procedures
2. Reinstate Brisbane City Council's commitment to environmental leadership by offering an incentives policy to encourage building and community-scale development projects to achieve measurable best practice sustainability outcomes
3. Consider introducing programs that build industry capacity to achieve and deliver best practice development projects.

1. Use Green Star – Communities

The GBCA encourages Brisbane City Council to review the Green Star – Communities rating tool to identify the ways in which it can inform planning scheme policies, codes, overlays and acceptable outcomes. The Green Star – Communities rating tool contains 38 ‘credits’ which represent a number of best practice benchmarks that community-scale development projects can aim to achieve across the categories of governance, urban design, liveability, economic prosperity and environmental sustainability.

Brisbane City Council can reference Green Star – Communities credits in the City Plan as acceptable outcomes and use the rating tool credit ‘compliance criteria’ and ‘documentation requirements’ to inform planning scheme policies. To provide a specific example: to gain points under the Green Star - Communities *Env-2 Ecological Enhancement* rating tool credit, a developer must use the Change of Ecological Value Calculator to compare the ecological state of the site at the date of purchase against the proposed ecological state of the finished site works. To reach the credit benchmark, biodiversity improvements of 20 per cent over the current site status need to be achieved and demonstrated through a Biodiversity Management Plan. This credit could inform the biodiversity areas overlay code and also the biodiversity areas planning scheme policy.

The Green Star – Communities Submission Guide contains all the rating tool credit details, compliance criteria and evidence requirements. As Brisbane City Council is a GBCA member, the Submission Guide is available to be viewed online for free at: <http://www.gbca.org.au/green-star/green-star-communities/rating-tool/>.

Recommendation 1: Brisbane City Council review the Green Star – Communities rating tool to identify credits that can inform planning scheme policies, codes and overlays or to identify credits that can be referenced as acceptable outcomes in codes.

2. Encourage best practice

Theme three of the City Plan strategic framework outlines Brisbane City Council’s aim for Brisbane to be ‘clean and green’ and ‘leading in environmental performance’. Despite this, there is very little in the City Plan to ensure future buildings or community-scale development in the Brisbane local government area achieves best practice environmentally sustainable design outcomes.

Given that the draft City Plan increases building height allowances and removes floor area ratios, now more than ever Brisbane City Council needs to put mechanisms in place to either require that best practice benchmarks are achieved for large-scale building or precinct-scale developments, or provide incentives or capacity building programs to encourage developers to deliver projects that demonstrate measureable best practice outcomes. The GBCA’s recommendations for an incentives policy and capacity buildings programs to support the City Plan objectives are discussed below.

Buildings and community-scale developments that are designed and built to a best practice standard deliver clear benefits to those living or working within the development itself but also to the wider community – an economic and social imperative with numerous economic and social benefits.

In May this year the GBCA released research that quantified the value of Green Star-rated developments. The research compared 428 Green Star-rated buildings with buildings that met minimum Building Code of Australia (BCA) requirements. The research methodology and findings were then peer-reviewed for accuracy by independent consulting firm Net Balance. The research found that on average, Green Star-rated buildings:

-
- Use 50% less electricity than those buildings built to meet minimum requirements
 - Use 51% less potable water than if they had been built to meet minimum requirements
 - Produce 45% fewer greenhouse gas emissions than those buildings built to meet minimum requirements.

This research demonstrates to local governments and the wider community is that, in addition to the potential energy and water cost savings, best practice or above buildings significantly reduce the strain on electricity and water infrastructure compared to buildings built to minimum standards.

Given the undisputed benefits of best practice buildings, councils across Australia are implementing policies to ensure development in their local area demonstrates good sustainable design. To provide a good example; the City of Melbourne recently introduced Local Planning Policy 22.19: *Energy, Water and Waste Efficiency* which recommends:

- Office, retail, education and accommodation developments up to 5000m² to achieve performance outcomes that are above minimum state and BCA requirements
- Office, retail, education and accommodation developments over 5000m² to achieve a 5 Star Green Star rating or equivalent.

The GBCA understands that Brisbane City Council's ability to put such requirements in place may be constrained as the Queensland State Government, through the Queensland Development Code, sets performance requirements in relation to sustainable buildings. Despite this, Brisbane City Council can provide incentives for development projects that are willing to demonstrate measurable best practice outcomes.

The GBCA recognises that the Brisbane City Council has demonstrated leadership in the past by offering some great financial and non-financial incentives for best practice development, such as the sustainable development grants for new office developments that could demonstrate a high environmental standard and measurable long-term sustainability benefits to the community. The GBCA widely promotes such incentives to industry and other governments across Australia and a possible indicator of its success is that 30 per cent of buildings in the Brisbane CBD now have a Green Star rating, the highest of all capital cities.

Given this, the GBCA encourages Brisbane City Council to reinstate its commitment to environmental leadership by offering some new incentives for best practice development projects. Many different types of incentives can be offered for demonstrated best practice development; below are some non-financial examples from Australia and the United States.

Expedited review / permitting incentives for demonstrated best practice design include:

- City of Issaquah, Washington puts projects that are achieving LEED certification (the United States' environmental rating tool similar to Green Star) at the head of the building permit review line
- City of San Diego, California, has committed to expediting discretionary processes for commercial projects achieving LEED Silver certification
- City of Miami Lakes, Florida allows for expedited permitting for private developers who build to the City's Green Building Program's standard which requires developments to meet a minimum of LEED requirements
- City of Gainesville County, Florida provides a fast-track building permit incentive and a 50 per cent reduction in the cost of building permit fees for private contractors who use LEED.

Fee waivers or height / density bonuses for demonstrated best practice design include:

- Gold Coast City Council's Policy 18 rewards developments that exceed normal building or urban design standards. Under the policy, plot ratio bonuses are offered to developments that demonstrate 'cutting edge' environmentally sustainable design including developments that target and achieve a 5 Star Green Star rating
- The City of Sydney's planning controls allow an extra 10 per cent floor space if design excellence is demonstrated. Environmentally sustainable design is one of the matters considered in determining whether design excellence has been achieved
- Canada Bay Council, New South Wales, allowed residential height bonuses to developers in return for initiatives or building fixtures that would increase the sustainability of the buildings and the site
- City of Pittsburgh, Pennsylvania grants an additional height variance of 20 per cent for projects that earn LEED certification. The bonus is available in all non-residential zoning districts.

The GBCA understands that Brisbane City Council offers a moratorium on infrastructure charges for four and five-star hotel developments approved to address a hotel shortage in Brisbane's CBD. Given that best practice buildings clearly reduce the strain on public infrastructure, the GBCA encourages Brisbane City Council to consider offering a similar incentive to applicants willing to deliver demonstrated and measureable best practice developments such as Green Star-certified buildings or community-scale developments.

Recommendation 2: Implementation of a policy that provides incentives for development that:

- Commits, at a building scale, to achieve measureable and independently-certified best practice environmentally sustainable design and construction outcomes.
- Commits, at a community-scale, to achieve measureable and independently-certified best practice social, urban design, economic and environmental outcomes for all types of projects, including greenfield development, brownfield development, infill development and urban renewal projects.

3. Build capacity and raise awareness

Governments, including local councils, can play a positive role in building industry and also the community's capacity to achieve best practice development. Given that the Queensland Government has removed some requirements and programs that ensured improved sustainable outcomes in the built environment (such as the removal of the energy efficient hot water system requirement), there is a new opportunity for Queensland councils to step in and educate the community and industry on the benefits of best practice buildings and communities.

Some good examples of how other councils are assisting industry to consider design-stage sustainable best practice and to deliver developments that go beyond minimum standards are:

- A large group of councils in Victoria (called the Council Alliance for a Sustainable Built Environment (CASBE)) ask development applicants to voluntarily address sustainability objectives at the planning stage.

The councils ask applicants to voluntarily provide information on the sustainable design initiatives they will include in the development through the lodgement of a Sustainable Design Assessment (a short report outlining sustainable design initiatives catering to small and medium sized applications) or a Sustainability Management Plan (a more detailed report catering to larger applications).

To inform their reports, applicants use the STEPS and SDS tools (for small-medium sized residential and commercial developments), or the Green Star rating tools (for large-scale developments).

- Palo Alto City Council in California has a program that requires development proposals larger than three dwelling units, or a quarter acre and major renovation projects, to have a planning review against the LEED-Neighbourhood Design rating tool (similar to the Green Star – Communities rating tool). Prior to design review, applicants must submit a checklist that details how the project meets or has a challenge meeting LEED-Neighbourhood Design credits. The goal is for the projects to be eligible for at least 30 points under the rating system. Failure to earn 30 points does not disqualify a development application; instead the program aims to raise industry awareness of holistic sustainable design for community-scale projects. If a project is pursuing LEED-Neighbourhood Design certification, they do not need to fill out this checklist provided that they can submit proof of registration, and when complete, submit their LEED-Neighbourhood Design certification.

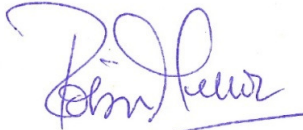
Recommendation 3: Consider implementing programs that build industry's capacity to deliver best practice sustainable developments and raise community awareness of the benefits of best practice buildings and communities.

Next steps

The GBCA encourages Brisbane City Council to consider the GBCA's three recommendations, particularly our recommendation regarding an incentives policy for best practice development.

The GBCA would welcome the opportunity to provide briefings to Brisbane City Council staff regarding the Green Star – Communities rating tool, noting that Brisbane City Council contributed funds for the development of this rating tool. For further information on the points discussed in this submission please do not hesitate to contact Emma Kelly, Advocacy Coordinator, by phone on 02 8239 6288, or via email at emma.kelly@gbca.org.au.

Yours sincerely,



Robin Mellon

Chief Operating Officer

robin.mellon@gbca.org.au