

1 March 2013

City Strategy & Design  
Moreland City Council  
Locked Bag 10  
Moreland 3058

Via email: [StrategicPlanning@moreland.vic.gov.au](mailto:StrategicPlanning@moreland.vic.gov.au)

Dear Sir/Madam,

**RE: AMENDMENT C123 COBURG PRINCIPAL ACTIVITY CENTRE ZONE**

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide comment on Amendment C123 concerning the Coburg Principal Activity Centre Zone. The GBCA supports the goal of a more efficient, healthy, productive, resilient and sustainable built environment for the Moreland City Council local government area. The GBCA also supports the inclusion of Green Star as a method of measurement for environmentally sustainable design requirements (ESD) in the C123 Amendment. However, the GBCA suggests some changes to the way in which the Green Star rating tool system has been referenced, and would invite Moreland's Strategic Planning Team to meet with the GBCA at the earliest possible opportunity to discuss how best to reference the rating tools to ensure ESD objectives and requirements are met in the Coburg Activity Centre Zone.

**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 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 93 such councils worldwide.

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### **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 environmental design and construction of buildings as well as establish a common language for green buildings.

There are currently nine Green Star rating tools which address a range of building types and over 550 projects have now achieved Green Star certification across Australia, with a further 500 projects registered. With the introduction of Green Star – Custom ratings in 2012, the GBCA can assess and certify almost any type of building except for single residential dwellings, for which other metrics, rating systems and standards are recommended.

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.

The GBCA advocates for a coordinated approach to raising the standards of the built environment that includes the use of contemporary regulation, referencing rating tools such as Green Star within government policy, and providing a range of both financial and non-financial incentives to encourage and reward best practice and above sustainable buildings and communities.

### **Amending the Green Star references**

The GBCA supports the inclusion of Green Star certification as a requirement for commercial and multi-unit residential developments in the Coburg Principal Activity Centre Zone.

However, the GBCA would recommend the below changes to C123 clause 37.08-1 p.10 to ensure that the requirements set by the City of Moreland are beneficial to the local community, achievable for industry, and to ensure development can be suitably assessed as having achieved the City of Moreland's desired benchmarks.

### **Requirements for 1 or more dwellings**

The Green Star rating system does not currently have a rating tool which applies to single residential dwellings. Given this, the GBCA would suggest removing the Green Star 6 Star requirement for single dwellings. The Nationwide House Energy Rating Scheme (NatHERS) would be a more appropriate requirement or guideline to reference for single dwellings.

The GBCA does operate the Green Star – Multi-Unit Residential rating tool and we would welcome the opportunity to discuss with the City of Moreland how the use of this rating tool could be encouraged for multi-unit residential developments in the Coburg activity centre zone so as to recognise better outcomes in the residential sector.

### **Requirements for non-residential uses over 500sqm**

For non-residential development over 500sqm gross floor area (GFA) and additions over 1000sqm GFA, the GBCA would suggest replacing the requirement for achieving 6 Star Green Star with a minimum requirement for 4 Star Green Star certification where a Green Star rating tool is available for the building type.

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While the GBCA applauds the City of Moreland for striving for World Leadership-standard buildings, we do believe that such a high requirement may be unattainable for a number of reasons and might therefore risk inhibiting growth and development in the Coburg activity centre zone. However, we would suggest providing a range of both financial and non-financial incentives to encourage industry to go beyond 4 Star Green Star benchmarks and achieve 5 Star Green Star ratings and above.

The GBCA therefore encourages the City of Moreland to achieve its wider vision for 'a liveable city, where people can shop, work and socialise locally' by setting a minimum certification level of 4 Star Green Star, signifying best practice, as a basic standard, and considering ways in which achieving 5 Star (demonstrating 'Australian Excellence') and even 6 Star Green Star (representing 'World Leadership') buildings might be encouraged through financial and non-financial incentives. The GBCA would welcome the opportunity to discuss the incentives which might be made available to builders and developers so as to set a minimum 4 Star Green Star rating and then encourage still better outcomes.

A 4 Star Green Star-certified rating requirement (where a Green Star rating tool is available for the building type), would be an excellent outcome for the local Coburg community. This requirement would mean future development is at a best practice standard and, in requiring Green Star certification, the City of Moreland and the wider community could be certain that development has been suitably assessed and verified as having achieved stipulated performance outcomes. Such outcomes can often be realised on a cost-neutral basis, whereby additional costs have not been incurred; the GBCA can provide such case studies.

#### **Requirements for non-residential uses 100sqm – 500sqm**

For non-residential development between 100sqm and 500sqm GFA and alternations and additions between 100sqm and 1000sqm GFA, the GBCA would suggest replacing the 4 Star Green Star requirement with a voluntary guideline for achieving 4 Star Green Star certification where a suitable rating tool is available.

The GBCA encourages all levels of government to commit to achieving Green Star certification for the buildings that they own, develop and occupy. However, we believe that in the case of non-commercial buildings between 100sqm - 500sqm and additions of 100sqm-1000sqm, the inclusion of Green Star certification should remain voluntary, primarily for cost and documentation reasons.

#### **Incentives for world leadership**

The GBCA strongly encourages the City of Moreland to consider implementing incentives to encourage development to achieve standards beyond best practice. Incentives could include fast-tracked, streamlined or discounted planning approval, plot ratio bonuses or reduced headworks charges for 5 Star or 6 Star Green Star developments.

By offering incentives, local government can ensure the type of development they desire is approved and achieved, whilst ensuring the local area continues to be a thriving and liveable community for residents.

Australian local government incentive examples include the City of Ryde in New South Wales which offers a floor space ratio bonus of up to 10 per cent and a three metre height bonus for buildings that achieve 5 Star Green Star.

Similarly, the Gold Coast Council's Policy 18 allows for floor space or plot ratio bonuses for 'exemplar' development within major town centres and mixed use commercial areas that achieve a 4 or 5 Star Green Star rating. Other incentives may include training and education options for companies committing to achieve 4 Star Green Star ratings and above, a Council Liaison Representative to ensure that ESD principles and Green Star benchmarks are incorporated as early as possible, and additional case study and marketing opportunities for projects achieving best practice outcomes.

Below is a summary of the GBCA's suggested changes to Amendment C123:

Development type	Exhibited ESD Standard	GBCA Recommendation
<p><b>Residential uses</b></p> <ul style="list-style-type: none"> <li>• One or more dwellings</li> <li>• Buildings and works creating 50sqm or more of additional gross floor area (excluding outbuildings)</li> <li>• Multi-unit residential</li> </ul>	<p>Green Star 6 Star</p> <p>Best practice stormwater treatment</p>	<p><b>One or more dwellings:</b></p> <p>NaTHERs</p> <p>Best practice stormwater treatment</p> <p><b>Multi-Unit Residential:</b></p> <p>Minimum 4 Star Green Star certification (Multi-Unit Residential)</p> <p>Incentives for 5 Star Green Star Multi-Unit Residential certification available</p> <p>Further incentives for 6 Star Green Star Multi-Unit Residential certification available</p>
<p><b>Non-residential uses</b></p> <ul style="list-style-type: none"> <li>• With gross floor area of more than 500sqm</li> <li>• Alterations and additions of more than 1000sqm</li> </ul>	<p>Green Star 6 Star</p> <p>Best practice stormwater treatment</p>	<p>Minimum 4 Star Green Star certification</p> <p>(where a Green Star rating tool is available for the building type)</p> <p>Best practice stormwater treatment</p> <p>Incentives for 5 Star Green Star certification available</p> <p>Further incentives for 6 Star Green Star certification available</p>
<p><b>Non-residential uses</b></p> <ul style="list-style-type: none"> <li>• With gross floor area between 100sqm and 500sqm</li> <li>• Alterations and additions between 100sqm and 1000sqm</li> </ul>	<p>Green Star 4 Star</p> <p>Best practice stormwater treatment</p>	<p>Green Star benchmarks used as guidelines. Voluntary Green Star certification.</p> <p>Best practice stormwater treatment</p> <p>Incentives for 5 Star Green Star certification available</p> <p>Further incentives for 6 Star Green Star certification available</p>

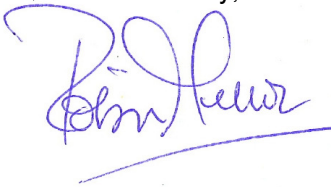
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As members of the GBCA we encourage the City of Moreland to look upon GBCA as the primary knowledge resource for green building and sustainable communities. Once again, we encourage the City of Moreland to contact us to discuss the ways in which the Green Star rating tools could be referenced within Amendment C123 Coburg Principal Activity Centre Zone to achieve the best outcomes for the Council, the community and the property industry.

The GBCA applauds the City of Moreland for their continued leadership role and strategic direction in implementing such planning scheme amendments.

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](mailto:emma.kelly@gbca.org.au), should any comments within this submission require clarification.

Yours sincerely,



**Robin Mellon**  
Executive Director – Advocacy