

Chief Executive Officer  
Attention: Dustin Moore, Specialist Planner – Strategic  
(Sustainability)  
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Sydney NSW 2001

Via email: [sydneyyoursay@cityofsydney.nsw.gov.au](mailto:sydneyyoursay@cityofsydney.nsw.gov.au)

28 May 2018

Dear Mr Moore,

**RE: GBCA SUBMISSION – ENERGY AND WASTE AMENDMENT 2018 : DEVELOPMENT CONTROL PLANS**

The GBCA appreciates the opportunity to provide comment on the energy and waste amendment to the Sydney Development Control Plan 2013 and Green Square Development Control Plan 2012.

We applaud the City's aspiration to see improved building performance in new developments and fitouts across its municipality and its work to strengthen ecologically sustainable development principles within its local planning policy framework. Our broader feedback to the City's vision and policies for Sydney's office buildings can be found in [our response](#) to *Sydney's Sustainable Office Buildings Plan*.

The GBCA is committed to promoting green building practices, design and technologies that help to develop a more sustainable property industry in Australia. Whilst Green Star is a voluntary rating tool, we have consistently advocated for policies and regulations that set and increase minimum requirements for environmental performance of the built environment. Such incremental increases will help to transform the built environment to one that is more sustainable, liveable and productive.

Please find our views on the proposed energy and waste amendments as follows:

**National Australian Built Environment Rating Scheme (NABERS) Energy Commitment Agreements**

The GBCA supports establishing standards in both Development Controls Plans for new, and major refurbishments of commercial office buildings with a net lettable floor area over 1,000 square metres to commit to achieving a 5.5 star NABERS Energy rating for the base building.

Many of our members operating within the municipality already undertake a large number of NABERS assessments, use NABERS assessments to facilitate energy efficiency upgrades and invest in NABERS rated commercial buildings. The GBCA works closely with the NSW Office of Environment and Heritage NABERS team to ensure alignment between NABERS and Green Star where possible, and NABERS energy ratings are a requirement of the Green Star Energy category (where relevant), to award building owners for implementing strategies and taking actions to measure and reduce a building's operational energy use, below that of a comparable standard-practice building.

While the proposed requirement would set a new standard for future commercial buildings in the City, we urge the City to investigate the scope for encouraging developers to go beyond a commitment to a NABERS Energy rating and aim for Green Star certification. A Green Star rating is designed take a holistic approach to evaluating the environmental design and construction of buildings and research has shown that the higher a Green Star rating, the greater the environmental savings – across key areas such as greenhouse gas emissions, energy use, water consumption and construction and demolition waste. The GBCA's 2013 report, *The Value of Green Star* found that on average, Green Star certified buildings:

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- Produce 62 per cent fewer greenhouse gas emissions than average Australian buildings;
  - Use 66 percent of electricity than average Australian buildings; and,
  - Use 51 per cent less potable water than if they had been built to minimum industry requirements.

Many local governments such as the City of Melbourne already advocate for Green Star outcomes within their municipalities through local planning policies and we would urge the City to encourage and incentivise Green Star outcomes within its own municipality. Ultimately, as we move towards a built environment that meets the Sustainable Sydney 2030 vision, Green Star should be required on an 'if not, why not' basis for all new buildings. These requirements should target both industry and the City's own buildings to assist in achieving many of the ESD principles outlined in the Sydney Development Control Plan.

### **Referencing Green Star**

Whilst we are pleased to see Green Star referenced in the Sydney Development Control Plan as a suggested rating tool which can be used to 'assess the environmental performance of buildings' the current wording in the Plan also accepts other 'similar rating tool(s)' without indication of a preferred standard. In our view, this requires Council planners to be responsive to the strengths and weaknesses between different rating tools currently in use which imposes a significant burden on their resources and expertise. We consider that further clarity is needed in the Plan to reflect a preference for a tool with the necessary level of independence and quality such as Green Star, which has been developed collaboratively between industry and government, holds a ISO 9000 Quality Management Certification and has certification governed by the *Competition and Consumer Act*.

Should the City wish to provide scope for alternative independent third party certification to Green Star, the assessment criteria needs to consider whether equivalent standards of independence, outcomes, verification and integrity have been met. The GBCA would be pleased to discuss with the City how to further ensure this wording can provide assurance and certainty to industry and consistency for the City.

### **Pathway for Improved Standards**

Whilst outside the scope of the proposed changes, we would further support the development of a pathway for the City's current planning controls to be strengthened over time to deliver net zero building standards. The GBCA is working to develop a pathway towards carbon positive buildings, and recently released a summary of our *Carbon Positive Roadmap for the Built Environment* which outlines our plan for carbon positive buildings and communities.

Throughout the development of this Roadmap, it has been clear that the built environment should decarbonise earlier than most sectors, given there are comparatively greater opportunities and lower costs for this to happen. Market leaders are already making substantial progress in reducing their emissions, and the sector as a whole is well placed to follow a trajectory for carbon reduction that helps keep global warming below the more stringent 1.5 degrees target under the Paris Agreement.

Notably, our work shows that in order for the built environment to achieve a 1.5 degrees target as outlined in the Paris Agreement:

- All new buildings and fitouts should have no carbon emissions from their operations by 2030, and;
- All existing buildings and fitouts must have no carbon emissions from their operations by 2050 or earlier.

We believe these targets can be met by facilitating a transition to buildings and fitouts that are built, refurbished and operated with no greenhouse gas emissions. The roadmap notes that there is scope for government at all levels to introduce well integrated climate change and energy policies which target deep emissions reduction in the buildings sector.

To ensure the sector's smooth transition, governments' approach to public policy should be focussed on:

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- Establishing targets by which the built environment and its supply chain must decarbonise;
  - Creating incentives to drive the built environment to meet a 2050 target; and,
  - Removing barriers to renewable energy installations, purchasing and distribution.

A more detailed discussion paper for the Roadmap is scheduled for release on 29 June 2018 which we would be pleased to present for the City's consideration to develop a pathway for planning controls that will deliver net zero building standards.

In the meantime, we encourage the City to call upon the GBCA if there is any support or resources we can provide. Please do not hesitate to contact Sandra Qian, Senior Policy Advisor at [sandra.qian@gbca.org.au](mailto:sandra.qian@gbca.org.au) or 0430 304 168 should you have any questions or require more information.

Yours sincerely,



Jonathan Cartledge  
Head of Public Affairs