

Planning Group
Department of Infrastructure, Local Government and Planning
PO Box 15009
CITY EAST QLD 4002

Via email: planningpolicy@dilgp.qld.gov.au

9 February 2017

Dear Sir/ Madam,

RE: QUEENSLAND GOVERNMENT PLANNING POLICY REVIEW

The Green Building Council of Australia (GBCA) commends the Queensland Government (Government) on its *Planning Policy Review* (Review) as it will deliver a more efficient planning system that better integrates the state's interests in the plan making and development assessment process.

The GBCA is the industry association committed to developing buildings, cities and communities that are productive, liveable, healthy, resilient and sustainable:

- **We rate** the sustainability of buildings and communities through Australia's only national, voluntary, holistic rating system – Green Star.
- **We educate** industry and government practitioners and decision-makers and promote green building programs, technologies, design practices and operations.
- **We advocate** for the sustainable transformation of the built environment.

The GBCA represents over 700 members from across industry and including 44 local governments, 26 state government departments and land organisations, and 18 universities. Our purpose is to lead the sustainable transformation of the built environment.

The GBCA is pleased to provide comment on each of the following:

1. Updated State Planning Policy (SPP)
2. Revised State Development Assessment Provisions (SDAP)
3. Draft Planning Regulation (Regulation)

1. Updated State Planning Policy

The GBCA commends Government for clarifying its interests and streamlining the planning system so that local planning schemes better integrate state interests. Through the clear articulation of state interests in the SPP, Government has demonstrated strong leadership by elevating the importance of key policy issues, specifically planning for liveable communities and optimal infrastructure, mitigating against emissions, hazardous activities and natural hazards and building community resilience. The GBCA also supports the guiding principles of the SPP, which helpfully references the importance of plan making processes and development decisions being outcome-focused, integrated, efficient, positive and accountable.

The state interests and principles outlined in the SPP complements the GBCA's strategic priorities, which include: driving a carbon positive industry; fostering liveable and sustainable communities and cities; broadening market transformation and increasing regional influence. The GBCA broadly supports the SPP and welcomes a constructive partnership with Government.

1A. The GBCA recommends for Government to identify 'Climate Change' as a core state interest in the State Planning Policy. This would enable Government to reinforce its commitment to climate change mitigation and encourage consent authorities to consider reduced GHG emissions as a desirable outcome in the development assessment process.

Keeping in line with national and international obligations under COP21, the GBCA recommends the Government identify climate change as a state interest within the Policy. As the Policy notes, the Planning Act provides for a performance-based approach to planning, which seeks to assess development by focusing on the outcomes to be achieved. In identifying climate change as a state interest, Government would encourage consent authorities to consider sustainability, for example reduced GHG emissions, as a desirable outcome in the development assessment process.

In articulating state interests, there is an additional opportunity for Government to further prioritise key issues. Consequently, this could instigate a review of state codes in addition to local planning schemes in a way that furthers these state priorities. For example, this would create space for the revision of the Queensland Development Code (QDC) (MP 4.1- Sustainable Buildings) which sets the building assessment provisions for building works in Queensland. While the QDC contains provisions for the design features of 6-Star and 5-Star equivalent residential buildings, energy efficient lighting, water conservation, energy efficient air conditioners, electricity sub-metering, etc, the GBCA welcomes a revision of the QDC MP 4.1 Sustainable Buildings Code so that it references Green Star as a suitable pathway for sustainable buildings. By referencing Green Star, Government can demonstrate strong leadership by encouraging industry to go beyond minimum standards in pursuit of truly sustainable buildings and communities.

1B. Government should reference Green Star as a suitable pathway for achieving climate responsive design and sustainable building materials. Moreover, Green Star provides the means to measuring and certifying the climate resilience of buildings and infrastructure.

As noted in page 20 of the Policy, "development should be more resilient and adaptable to climate change impacts when appropriate consideration is given to climate responsive design and suitable building materials". The GBCA would recommend Government, within the state and local level, to identify Green Star as a suitable pathway for ensuring that proposed developments do adopt climate responsive design and sustainable buildings materials. 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, Transport and Innovation and defining 'best practice' in each. Moreover, the advantage of Green Star is that it is consistent with a performance-based approach to planning in that it provides metrics for measuring concrete outcomes, with the assurance of independent, third party verification.

As noted in page 49 of the SPP, “effective planning of infrastructure should also consider the possible impacts of climate change”. The GBCA advocates the use of Green Star rating tools to assess the climate resilience of buildings and infrastructure. Green Star contains ‘Adaptation and Resilience’ credits, which incentivise projects to develop Climate Adaptation Plans and integrate building design and construction solutions in accordance to these Plans. Furthermore, Green Star incentivises projects to minimise impacts on environmentally sensitive sites, to reduce environmental impacts of construction materials, to reduce and effectively manage storm-water runoff and to encourage water-sensitive design.

The extensive experience of the GBCA in delivering sustainable and resilient infrastructure can be seen through key projects including the Regional Rail Link, Flinders Medical Centre and Brisbane Airport. Victoria’s Regional Rail Link was awarded a 4 Star Green Star – Custom Design rating, boasting significant energy and water savings with 14,000 tonnes of GHG emissions saved annually. Similarly, Flinders Medical Centre was awarded a 5 Star Green Star – Design and As Built rating, having been designed to deliver high quality patient care with a minimal environmental footprint. Meanwhile, the Brisbane Airport site achieved a 4 Star Green Star – Communities rating. The Brisbane Airport Corporation implemented a comprehensive stakeholder engagement strategy for the precinct, together with a plan for facilities, programs and events that promote cohesion and interaction between the people who use the precinct. I have attached the abovementioned case studies for further information.

1C. Government should reference Green Star – Communities within the State Planning Policy and local planning schemes, as a suitable pathway for creating sustainable and complete communities, and promoting affordable living.

The GBCA commends Government for referencing ‘liveable communities’ as a core state interest. As page 22 notes, “to enhance liveability, built and natural environments can be innovatively designed, or transformed through the well-planned placement and design of buildings, pedestrian and cyclist access, road and street networks, sport and recreation facilities and public open spaces”. It notes that local planning instruments should encourage quality urban design and place making outcomes that promote affordable living and sustainable and complete communities. Government should reference Green Star – Communities within the SPP as a suitable pathway for achieving this policy outcome.

Green Star – Communities provides an agreed framework and set of benchmarks for measuring sustainability outcomes such as affordable housing, sustainable transport, provision of local jobs, investment in education and skills development as well as enhanced productivity through the digital economy. The five Green Star – Communities best practice principles are:

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

The Green Star – Communities rating tool is currently influencing the design and delivery of more than 50 large-scale community developments around the country – from Barangaroo South in Sydney, which will house 23,000 workers each day, to Aura on the Sunshine Coast that will be home to 50,000 people, to Brisbane Airport.

2. Revised State Development Assessment Provisions

The GBCA supports the revision of SDAP, which will improve the structure, and ease of assessing development applications where the state has a role as assessment manager or referral agency. The GBCA commends Government on key policy changes including:

- the new State Code relating to urban design outcomes for significant projects;
- new provisions relating to development in proximity to railways including vibration emissions, collision and throw protection;
- revisions to the Coastal Development and Tidal Works State Code to provide more comprehensive criteria to acknowledge climate change;
- revisions to the Queensland Heritage Code to provide for a broader range of assessment criteria; and
- policy and terminology change from 'major hazard facilities' to 'hazardous chemical facilities' which expands the state's role for assessing these types of facilities.

2A. The structure of the Urban Design State Code should be made consistent with other SDAP codes, so as to incentivise applicants to ensure that developments satisfy the eight urban design principles identified. Furthermore, applicants should be required to explain omission of any of the eight urban design principles and suggest mitigation strategies accordingly.

The new State Code on Urban Design is a step forward in ensuring that significant projects result in high quality urban design outcomes for a locality or region. The eight urban design principles outlined in the State Code are vital to the creation of liveable and sustainable communities. Thus, it is commendable that the State Code requires applicants to provide a statement on how their planning proposal considers and responds to these individual principles. Applicants should be required to explain when the proposed development omits any of the eight urban design principles, and relevant mitigation strategies should be included accordingly.

The GBCA recommends Government to refine the structure of the Urban Design State Code so that it is consistent with other SDAP codes. As the SPP notes, it is important that plan making and development assessment processes are outcome-focused. Consistent with this, the structure of the Urban Design State Code should identify specific and concrete performance outcomes on urban design. In this way, the Urban Design State Code is not only outcome-focused, but also incentivised.

3. Draft Planning Regulation

The GBCA commends Government on the Regulation, which proposes key improvements including:

- clarifying referral triggers, particularly in relation to urban design, state transport corridors, coastal development and Brisbane core port land;
- consolidating the state's planning regulatory requirements, especially in respect to the state-wide codes; and
- clarifying the development assessment roles between local and state government.

3A. Government should review and expand the assessment benchmarks for infrastructure developments, to include resilience and sustainability benchmarks.

Page 257 of the Regulation notes the assessment benchmarks for linear infrastructure and infrastructure stated in schedule 5. The GBCA notes that the assessment benchmarks outlined are primarily in relation to location and ensuring that the relevant infrastructure does not affect environmentally sensitive sites. The GBCA recommends Government to review and expand the assessment benchmarks for infrastructure developments, to include more holistic resilience and sustainability benchmarks. Specifically, the assessment benchmarks should ensure that planned infrastructure is responsive to community needs, sustainable with reduced emissions and waste, and resilient to the impacts of climate change. As previously reiterated in section 1 of the submission, Government should reference Green Star as a pathway for measuring and delivering sustainable outcomes for infrastructure.

I encourage Queensland government to look upon the GBCA as the primary sustainable building and communities resource to assist in achieving the sustainability objectives of its *Planning Policy Review*. Please do not hesitate to contact me on 02 8239 6200, or via email at jonathan.cartledge@gbca.org.au for further information.

Yours sincerely



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