

Cities Division
Department of the Prime Minister and Cabinet
1 National Circuit
Barton ACT 2600

20 January 2017

Dear Sir/Madam,

Re: Smart cities and suburbs program draft guidelines

The Green Building Council of Australia (GBCA) commends the Turnbull Government for renewing the discussion on our cities, on its commitment that priority will be placed on investments that improve environmental outcomes, and the promise to encourage the use of rating tool systems such as Green Star as a means to define best practice outcomes and verify performance.

Since its inception in 2002, the GBCA has worked towards inspiring, influencing and empowering the property and construction industry by driving the adoption of sustainable building and community practices. To effectively respond to rapid changes facing our cities in the context of globalisation, resilience and adaptation, technological advances and shifting social demands, the mandate of the GBCA extended and evolved beyond green buildings to address the broader challenge of catalysing a sustainable cities movement.

The GBCA appreciates the opportunity to provide comment as part of the public consultation on the Smart Cities and Suburbs Guidelines and refers the Department to our submission on the Smart Cities Plan in June 2016. This submission has focussed on some specific comments in relation to the objectives of the Smart Cities and Suburbs program, the eligibility criteria and the merit criterion.

The Backbone of Smart Cities – Buildings, Infrastructure and Precincts

For 15 years the GBCA has been influencing the buildings and communities we create, by setting rigorous performance based sustainability standards, and building the capacity of practitioners and policy makers to advance such outcomes.

The GBCA believes that smart cities also need to be sustainable cities, ensuring that our buildings, precincts, and the interconnected infrastructure between them performs to their optimum. The Green Star rating system has been providing the yardstick for sustainability in the built environment for over a decade, and the mission of the GBCA aligns closely with the purpose of this grant program—to help local government and communities become more liveable and for urban service delivery to become more efficient and effective, as well as support projects that are citizen-centric and link closely with strategic plans.

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The Smart Cities and Suburb program has the potential to accelerate outcomes at a precinct and city-wide level that we have been experience for some time in the smart buildings space. Using the lesson learned from smart buildings practices, we can leverage up those outcomes and replicate them on a greater scale. This program just might provide the catalyst necessary for local government to 'scale up' their thinking, their investment, and their goals in applying smart solutions that can help achieve their sustainability targets.

Our Position on the Draft Guidelines

The objectives of the program are comprehensive, and GBCA supports the strong focus on liveability, and a people-first approach. This aligns with the Green Star framework for buildings and communities and we encourage the Department to reference the National Green Star Communities Framework (2011) that was developed to provide government and industry with some comprehensive parameters on what sustainable and liveable cities constitute.

A summary of this framework from the Green Star – Communities rating tool is provided below, and we encourage its inclusion in the final Guidelines to help applicants frame the boundaries of their projects.

Governance

The purpose of the Governance category is to encourage and recognise developers and development that demonstrate leadership within the sector, by the establishment and maintenance of strong governance practices. The category promotes engagement, transparency, and community and industry capacity building. It also seeks to ensure that community developments are resilient to a changing climate.

Liveability

The Liveability category encourages and recognises developments that deliver safe, accessible and culturally rich communities. The category encourages the development of healthy and active lifestyles, and rewards communities that have a high level of amenity, activity and inclusiveness.

Economic Prosperity

Economic Prosperity aims to encourage and recognise developments that promote prosperity and productivity. The category encourages affordable living and housing, investment in education and skills development, and the facilitation of community capacity building. The Economic Prosperity category also promotes greater productivity via emerging opportunities in the digital economy.

Environment

The Environmental category 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.

The GBCA believes there is a strong connection between the Smart Cities and Suburbs program with the wider 'cities agenda' being advanced by the government. For example, the performance based City Deals approach is an ideal opportunity to further embed smart cities outcomes, provided that clear metrics are developed and embedded in the investment decision making process.

The GBCA watches with great interest the many innovative ways in which technology and data collection and analysis is helping local governments build greater sustainable outcomes in the built environment. This application of smart cities technologies in our building and precincts is an exciting one, and the GBCA encourages the Department to look favourably on those submissions for funding that can help accelerate more sustainable building and precinct development that strives for zero carbon outcomes, and well as being resilient, and liveable.

To this end, the draft guidelines could be enhanced in the following specific ways:

- Where there is reference to solutions being aligned with existing Smart Cities
 Strategies and Digital Plans, that reference is also made to sustainability policies and
 strategies.
- We strongly recommend that acknowledgement be made to the active investment in building management technology to reduce greenhouse gas emissions, and to go further and require all applicants to reference in their applications how they will support the government's commitment to the Paris Agreement.
- With respect to the project priority areas, it is critical that the Smart Infrastructure category recognise buildings, given their contribution to greenhouse gas emissions, and the impact they have on human health. It is recommended that this be made explicit, that 'smart infrastructure' is defined as both horizontal (e.g. roadways) and vertical (e.g. buildings) infrastructure.
- The Smart Precincts priority area could be strengthened with reference to Green Star
 Communities, and the criteria and outcomes it defines as best practice.
- In addition, the Smart Planning category should be renamed 'Smart Planning and Design' to acknowledge the extensive work and commitment of industry to advance the application of Building Information Modelling tools and processes.
- Make reference in the eligibility requirements of the Green Star Communities Framework (as summarised above) to support projects in responding to the grant requirements under Merit Criterion 2.
- Merit Criterion 3 should more clearly articulate the environmental and social benefits an applicant's proposal provides. Again, by including the Green Star – Communities Framework this will provide applicants with a comprehensive reference point as they scope their response.

The GBCA will continue to work closely with the Department, and its key industry partners on this program, and the closely aligned City Deals framework, to ensure this opportunity to invest in smarter cities is realised.

Please do not hesitate to contact me on 02 8239 6200, or via email at jonathan.cartledge@gbca.org.au, for further information or to arrange a meeting.

Sincerely

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green building council australia