
New Zealand Green Building Council

NZGBC Submission on the Proposed Auckland Unitary Plan (GREEN STAR)

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Thank you for the opportunity to make a submission on the Proposed Auckland Unitary Plan.

As the fastest growing region in Australasia, Auckland's population is set to increase from 1.46 million people to 2.1 million people by 2040. To accommodate this growth it is anticipated that 330,000 new dwellings will be needed, in addition to a significant increase in commercial buildings and infrastructure. It is crucial that this growth occurs in the most sustainable way possible to safeguard the environment and contribute towards the vision of Auckland becoming the world's most liveable city.

INTRODUCTION

Who we are

1. The New Zealand Green Building Council (NZGBC) is a not-for-profit industry organisation which leads green building initiatives in New Zealand. NZGBC was established in 2007 by the New Zealand building & construction and property sectors who sought to develop a group that recognised and rewarded (by way of rating tools) building best practice.
2. Our members include industry leaders committed to developing market based solutions that help deliver environmentally sustainable, innovative buildings for New Zealand. Our vision is that New Zealanders live, work and play in healthy, efficient, productive and sustainable buildings, today and into the future. To date the NZGBC has successfully introduced:
 - the suite of Green Star NZ rating tools for encouraging best practice in office, industrial, education and office fit out projects – with 100 certifications across New Zealand,
 - the Homestar residential rating tool with agreements in place for 700 certifications across New Zealand and 16,000 completed self-assessments online,
 - the BASE introductory level green building standard for the Christchurch rebuild,
 - the NABERSNZ energy performance rating tool for office buildings in collaboration with EECA Business.
3. NZGBC has also trained 991 people in Green Star (accredited professional and practitioner), 486 people in Homestar (practitioner and assessor and homecoach), and 89 people in the NABERSNZ rating tool (assessor and practitioner).

International green building evidence

4. There is strong evidence to support the value case for building green. The World Green Building Council, of which NZGBC is a member, recently released The Business Case for Green Building (<http://www.worldgbc.org/activities/business-case/>). This report synthesises all the credible evidence-based research from around the world on the costs and benefits of green building. The key findings are:
 - **Cost:** Building green does not necessarily need to cost more, particularly when cost strategies, program management and environmental strategies are integrated into the development process right from the start. The cost premium is typically not as high as is perceived by the development industry.
 - **Profitability:** Buildings with better sustainability credentials enjoy increased marketability and are able to more easily attract tenants and to command higher rents

and sale prices. There are indications of emerging 'brown discounts', where buildings that are not green may rent or sell for less.

- **OPEX:** Green buildings have been shown to save money through reduced energy and water use and lower long-term operations and maintenance costs. Energy savings in green buildings typically exceed any design and construction cost premiums within a reasonable payback period.
 - **Productivity:** The green design attributes of buildings and indoor environments can improve worker productivity and occupant health and well-being, resulting in bottom line benefits for businesses.
 - **Economic resilience:** Extreme weather events and systematic changes in weather patterns affect the insurability of real estate and lead to questions about the resilience of assets.
 - **Community:** By greening our built environment at the neighbourhood and city scale, we can deliver on large-scale economic priorities such as climate change mitigation, energy security, resource conservation and job creation, long-term resilience and quality of life.
5. The widely used mechanisms to influence the evolution of the built environment to be more viable in the long-term, and designed/constructed/operated to an international standard, are rating tools. Rating tools are aimed at influencing the entire value chain of the building and construction sector to better understand the changes necessary to build to a better quality, utilise the latest techniques and practices from around the world and be able to benchmark against standard and best practice in other countries.
 6. Rating tools are tailored to the country in which they are used. The industry accepted standard in New Zealand is Green Star NZ for design and build of office, industrial, education and custom buildings. The tool developed for the residential sector in New Zealand is Homestar.
 7. All rating tools adopted in New Zealand are either developed in New Zealand by a Technical Working Group representing industry, or adapted to the New Zealand market by an Industry Working Group. Industry participation in the development of these tools is a cornerstone of NZGBC's modus operandi. They are set up by industry, for industry.

Introducing Green Star

8. Green Star NZ is a comprehensive, national, voluntary environmental rating scheme that evaluates the environmental attributes of New Zealand's buildings using a suite of rating tool kits developed to be applicable to different building types and function. Green Star is aimed at achieving and exceeding best practice. The Green Star tools are focused on planning, designing, and constructing buildings that will be fit for the future. They were developed at the request of the building industry, have been adapted and developed by industry for the New Zealand climate and provide a benchmark of quality.

They also:

- Establish a common language and standard of measurement for green buildings
- Promote integrated, whole-building design
- Raise awareness of green building benefits
- Recognise environmental leadership

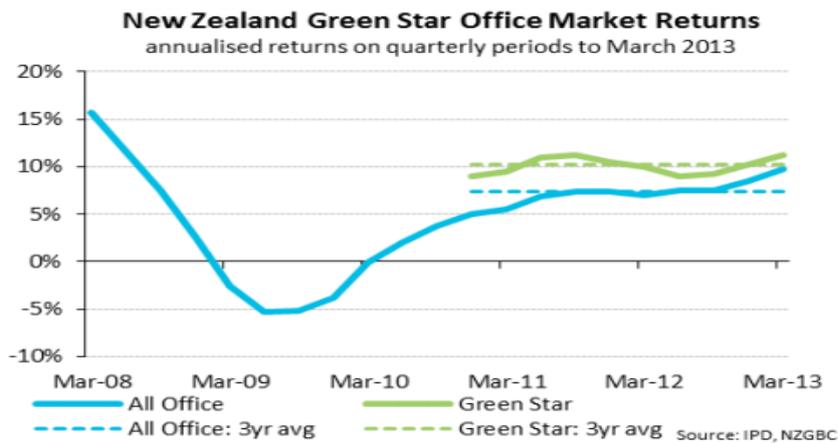
- Reduce the environmental impact of development.
9. The Green Star suite of rating tools was designed to match the key phases in a building's life cycle – design, build and performance and currently address design and construction of buildings. The NABERSNZ tool is used for the rating of energy performance in office buildings and is also administered by NZGBC in the New Zealand market.
10. The current Green Star tools assess the environmental impact that is a direct consequence of a building's site selection, design, construction and maintenance. The framework has eight separate environmental impact categories plus an innovation category. Credits are awarded within each of the categories based on the building's environmental merits in a range of areas and they take into consideration the unique development requirements and impacts of each sector. Points are then weighted and an overall score is calculated, determining the project's Green Star rating.

Possible Ratings:

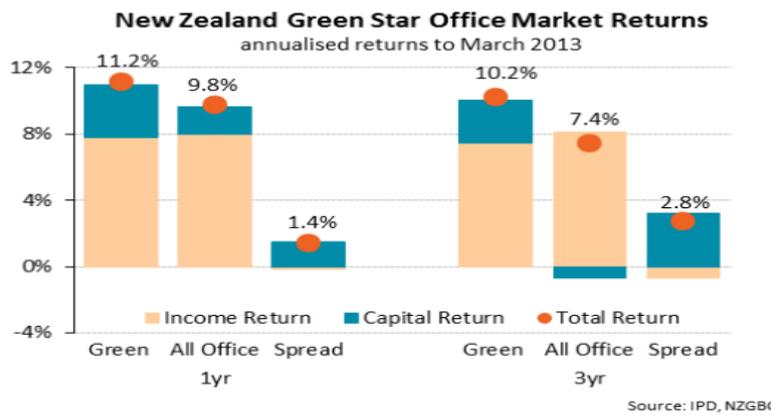
- 4 Star Green Star Certified Rating (score 45-59) signifies 'Best Practice'
 - 5 Star Green Star Certified Rating (score 60-74) signifies 'New Zealand Excellence'
 - 6 Star Green Star Certified Rating (score 75-100) signifies 'World Leadership'
11. Building green does not need to cost more, especially when cost strategies, programme management and environmental strategies are integrated into the process right from the start i. The cost of building green is commonly understood to include:
- Features or aspects that are included in the design of the building, either at detailed design stage (preferable) or retrofitted into the design stage later (more costly).
 - Use of professionals (e.g. engineers, architects, project managers, etc.) who are trained in using the tool (or aspire to gain deeper experience in the use of the tool), and
 - Certification fee payable to NZGBC (rates advertised on our website, but an insignificant proportion of the total figure).

12. Using an integrated design process ensures that the Green Star aspiration of the building is included in the planning for the project and not added as an extra (usually more expensive cost) later. In the early days of Green Star in the market, an early adopter premium is likely to have been applied across the market, however with seasoned professionals using a principles based approach, this premium should be significantly reduced and now business as usual.
13. A 2013 study comparing the actual construction cost of certified green office buildings in New Zealand with conventional buildings, ii concluded that, on the whole, green buildings are not inherently more expensive due to their provision of sustainable materials and systems, and green buildings can be less expensive when mechanical systems are minimised or omitted (e.g. energy efficient design produces savings in ductwork, and also reduces the need for bulky mechanical equipment so more floor space can be made available for leasing). The study found that buildings with 5 and 6 Green Star ratings, had higher on average construction costs (but the difference was not statistically significant), and had the largest cost savings (–35%) and highest cost premiums (96%).
14. IPD (Investment Property Databank) is an industry leader in benchmarking, property research and metrics. IPD have considered the financial performance of New Zealand’s Green Star rated buildings and in results released in November 2013,iii the following information was confirmed:
 - Between March 2011 and March 2013 New Zealand’s Green Star rated office buildings gave annualised returns of between 2-4% higher than the general office building stock;
 - In one year Green Star office buildings outperformed non-Green Star office buildings by a total of 1.4% (across rental and capital return); and
 - Green Star offices had lower cap rates by 0.4% over general office building stock.
15. Green Star buildings support financial returns in several ways:
 - Risk mitigation
 - Increased return on investment (ROI)
 - Capital cost savings
 - Increased sale price
 - Asset protection
 - Lower operating costs
 - Higher lease rates
 - Increased property value
 - Increased occupant productivity
 - Reduced operating costs
 - Reduced absenteeism
 - Higher rental demand (less down time)
 - If carbon is charged; fewer carbon emissions.

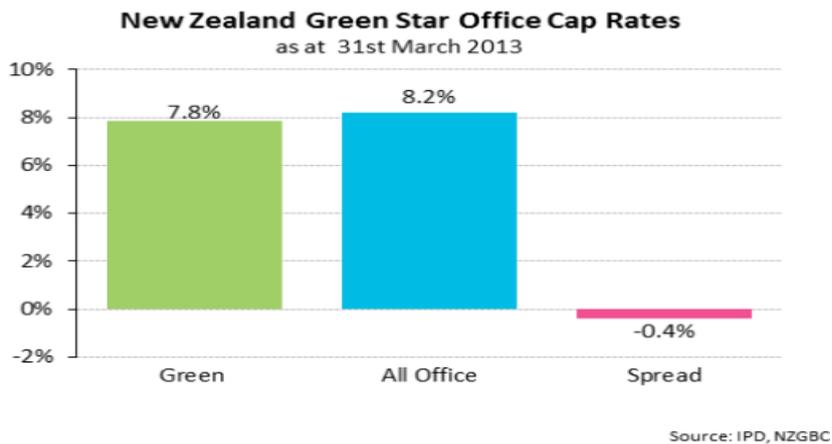
Evidence of higher returns for Green Star rated assets



Stronger growth in capital values driving outperformance



Evidence of lower cap rates for green rated offices



SUBMISSION INTRODUCTION

Introduction

16. We recognise the critical role the Unitary Plan plays in ensuring we manage Auckland's resources in a way that sustains and preserves them for future generations.
17. We strongly support the principle of a quality compact city which enables growth around centres and business areas which offer good access to high-frequency public transport, community facilities and open space. We also support the approach within the Unitary Plan to address climate change through both mitigation and adaptation.
18. We support the eight issues of regional significance for resource management in Auckland identified in the Unitary Plan. We believe that the sustainability of the built environment is an inherent component of each of these issues:
 - enabling quality urban growth
 - enabling economic well-being
 - protecting our historic heritage, historic character and natural heritage
 - addressing issues of significance to Mana Whenua
 - sustainably managing our natural resources
 - sustainably managing our coastal environment
 - sustainably managing our rural environment
 - responding to climate change

NZGBC's position

19. The New Zealand Green Building Council fully supports Auckland Council in its aspirations to promote quality building. We recognise the role the Unitary Plan plays in ensuring we manage Auckland's resources in a way that sustains and preserves them for future generations.
20. NZGBC supports the whole-of-Council approach that strives for higher quality buildings in a sustainable built environment across Auckland. Assessment tools developed by the NZGBC (Green Star for office and industrial buildings and Homestar for housing) have been proposed for inclusion in the proposed Unitary Plan, as well as alternative compliance options, to establish whether a building achieves these outcomes.

21. Green Star is a comprehensive, environmental sustainability rating tool that rewards the outcome achieved rather than prescribing the solution. The tools allow the building to respond to the site and context, functionality requirements and the occupants' needs. Building owners and property developers have some flexibility to target the criteria which suit their project best.
22. In principle, NZGBC supports Auckland Council taking a leadership role in the efficient delivery of buildings of a higher sustainability standard. We support the vision of more sustainable buildings across Auckland.
23. NZGBC provides market-based mechanisms that encourage the adoption of new and sustainable design, construction and operational practices of both commercial and residential buildings. We believe that the practicalities of actual implementation of Council's proposals in relation to our market-based mechanisms need more refinement. The following submission has therefore been written in response to the mention and inclusion of our rating tools in the Unitary Plan.

THE PROPOSED AUCKLAND UNITARY PLAN

This section of the report briefly sets out the statutory framework applicable to the NZGBC submission.

Resource Management Act 1991

24. NZGBC believes the Proposed Auckland Unitary Plan which seeks to manage Auckland's resources in a way that sustains and preserves them for future generations, whilst creating a quality compact city with good quality buildings, and addressing climate change through both mitigation and adaptation achieves the purpose and principles of Part 2.

S32 Analysis

25. NZGBC believe the proposed rules will achieve the purpose of reducing the environmental impact of new buildings and improve the efficiency, the health and the comfort of new buildings.
26. Green Star provides a simple and consistent framework to assess industrial and office developments without the need for an extensive and complex list of rules covering all aspects of a building's design. The tools do not prescribe design of a building, and allow site, context and design flexibility. The NZGBC tools provide a definitive sustainability benchmark for buildings; buildings are rated against set criteria and there is minimal subjectivity in assessment.
27. The NZGBC agrees with the conclusion reached by the Council in the s32 analysis specifically covering the costs, benefits, and alternatives. The s32 analysis conclusion of sustainable design is as follows:

The effects of climate change can be directly linked to how our built form performs. Similarly, buildings that are not designed to maximise sustainability increase environmental, social and economic effects such as water quality, health and operational costs. It is important that as Auckland grows the use of natural resources is managed in a sustainable way. The NZGBC Homestar and Green Star tool provide a simple, flexible and

innovative method of benchmarking the sustainable design of new building. Such an approach incurs minimal upfront costs which are returned in the short-term and generate even more significant social, economic and environmental gains over the longer term.

28. Assessment tools developed by the NZGBC (Green Star for commercial and industrial buildings and Homestar for residential dwellings in a separate submission) have been included in the Proposed Unitary Plan, as well as alternative compliance options, to establish whether a building achieves sustainable building outcomes.
29. NZGBC is happy to work with Council and other pertinent stakeholders to discuss the pros and cons of the various approaches, and consider ideas and suggestions to achieve a sustainable built environment. The following feedback is provided as a response to the inclusion of our rating tools.

The Unitary Plan

30. NZGBC would like to acknowledge that we specifically support the following proposed Objectives and Policies of the Proposed Unitary Plan (RPS and Auckland-wide);
 - B 2 Enabling quality urban growth Objective 2.2A Policy 11
 - C 7 General 7.7 (sustainable design) Objective 1 Policies 1 & 3
31. NZGBC believe a quality built environment, with minimised environmental impacts achieved through best practice sustainable design is the only way forward for Auckland. Buildings can easily be designed to minimise adverse environmental effects, maximise efficiency and provide healthy and comfortable indoor environments.
32. The following comments are made in relation to the following proposed Rules (referred to from this point forward from rules 6.4.2.2.1 and 6.4.2.3.1) of the Proposed Unitary Plan.
 - H.6.4 Sustainable Development 2.2 Offices Rule 1 & 2
 - H.6.4 Sustainable Development 2.3 Industrial Activities Rule 1 & 2

NZGBC feedback stemming from Rules 6.4.2.2.1 and 6.4.2.3.1

Design or Built Ratings

33. The Green Star tools offer separate Design ratings and Built ratings for both the Green Star Office and Industrial building ratings. The Rules, as currently drafted, do not delineate between whether Design or Built ratings are the preferred outcome by the Council.
34. Design and Built ratings both play important roles. *Design Ratings*: This includes assessment of the plans and paperwork, and Green Star credits targeted in order to achieve the requisite points. Design ratings encourage project teams to consider sustainability from the initial stages of a project's development by providing a recognised set of best practice benchmarks for sustainable design.
35. *Built Ratings*: Built ratings are achieved after practical completion and confirm that the building has been built to the Green Star standard claimed. This rating demonstrates that the Green Star criteria have been met through construction and in the final outcome.
36. If the proposed rules are to be included in the Unitary Plan, the NZGBC suggests that Design ratings are used as the required standard, with registration for a rating as proof at the RMA stage and Green Star Design at building consent. This suggestion is made on the following basis:
 - The Green Star Built tools (not Design tools) assess developments post-construction and therefore create a RMA consenting issue where the tools are used to prescribe an activity status at the outset of a building proposal;
 - Green Star Design ratings signal to the market that the building will be a green building and can attract tenants;
 - Green Star Design ratings can be achieved at any point in the building stage which thus would make compliance with the rules more straightforward;
 - Green Star Design rating provides the groundwork and therefore makes Built ratings easier to achieve.

Alternative compliance paths

37. The proposed rule which includes the Green Star tools as a certification option, also includes provision to use the Green Star tools of the Green Building Council of Australia (GBCA) and the Living Building Challenge (LBC). NZGBC understands and supports the practicalities of offering alternative compliance paths, however would like to raise the following matters in association with use of these tools:

GBCA: The GBCA's versions of the Green Star suite of tools are not applicable for use in New Zealand as they have not been adapted to the New Zealand climate or market. In 2007, prior to the NZGBC launching the Green Star tools in New Zealand, the NZGBC engaged widely with the New Zealand building & construction and property sectors in an in-depth adaptation process of the GBCA's tools to ensure they are relevant, usable and applicable to the industry in New Zealand.

Changes made during this adaptation included development of different credits, changes to the category weightings (e.g. carbon emissions from electricity in New Zealand is much lower than in Australia), including New Zealand standards, recognition of what the industry here is capable of doing and how the tool can encourage improvement.

38. For clarity, the New Zealand Green Building Council would like to make clear that the Green Star New Zealand tools are licenced from the GBCA. The GBCA owns all intellectual property rights in Green Star, including rights to its trademarks, copyright and other proprietary rights in the rating tools, education materials, technical manuals and other materials relating to Green Star.
39. Living Building Challenge: The Living Building Challenge encourages and requires true building innovation; NZGBC commends and is delighted to see New Zealand projects take on this challenge. The New Zealand Green Building Council would also like to highlight that final certification under the Living Building Challenge only begins 12 months after completion of the building. Certification of a building project may only be partial and this may create compliance issues.

Proposed Unitary Plan “offices” definition

40. The Unitary Plan definition of ‘office’ in the plan states:

Activities conducted within a building and focusing on business, government, professional, medical, or financial services and includes the personal service elements of these activities offered to consumers or clients where visits by members of the public are accessory to the main use.

41. The office definition includes medical services. The Green Star NZ Office tool is not applicable for offices used for medical purposes. In the relief sought, the NZGBC seeks change to this rule by way of a listed exemption under 2.d.

‘Equivalency’ risks

42. The proposed wording of Rules 6.4.2.2.1 and 6.4.2.3.1 the Proposed Unitary Plan each require new buildings to be “designed and constructed to achieve a minimum 4-star level from the New Zealand Green Building Council Green Star.. Tool..”. The NZGBC would like to highlight that, although we believe implied, this may not require the buildings get certified ratings under the tools. Accordingly, NZGBC has proposed alternative wording in the relief sought.
43. With each certified project, Green Star broadens the base for the transformation of the commercial building industry. Green Star provides an independent verified and valid measure of overall quality and proof for building owners. Environmental rating tool certification cuts through ‘green-wash’ and ensures buildings are designed and built to meet a rigorous industry standard.

Analogy for the value of Green Star certification as opposed to building 'equivalency':

Whilst attending university for four years, investing money in expanding intellect and gaining the benefit of increased knowledge, a student may know they had diligently attended courses and worked hard to achieve strong learning outcomes, why would they then not sit the exam and receive the certificate? And if they didn't, in 5 or 10 years, would a prospective employer believe them?

A building and its occupants will benefit from being designed and constructed to an equivalent standard to Green Star, however, once the investment has been made to improve the building and its systems, certification proves it unequivocally.

'Construct to achieve' risks

44. The proposed wording of Rules 6.4.2.2.1 and 6.4.2.3.1 of the Proposed Unitary Plan each require new buildings to be "designed and constructed to achieve a minimum 4-star level from the New Zealand Green Building Council Green Star.. Tool..". The NZGBC would like to highlight that the Design tool is assessed from the plans and therefore assessment of whether the building has been constructed to achieve the standard is irrelevant. However, if the Council chooses to go with Built ratings, then this construction requirement would be vital.
45. On the basis of the above suggestion to consider utilising the Design rather than the Built ratings in the Proposed Unitary Plan, NZGBC has proposed alternative wording in the relief sought.

ALTERNATIVES AVAILABLE TO COUNCIL

Council Implementation Options

46. Practical implementation of Green Star into the Unitary Plan remains a little unclear however NZGBC remain committed to assisting Council and other organisations, if necessary, to ensure a smooth and transparent use of our rating tools.
47. There are a number of additional opportunities outside the Unitary Plan to influence the sustainability of our built environment. Whilst acknowledging that these ideas require more development and work covering their practicality, likely outcomes and implementation options, we propose them as possible and suitable additional measures to be considered outside the Unitary Plan process. NZGBC would be delighted to work with Council and other interested parties to develop these and other options.
48. Discounted rates given to Green Star certified buildings
Rates are charged by Council to pay for public transport, events, parks and community facilities. They are an ongoing charge associated with the land site. Rates are Council's investment in communities, facilities and infrastructure for Aucklanders.

Green Star buildings reduce demand on public infrastructure. Rates relief could be offered to sites that contain Green Star certified buildings. The discount applied could depend on

the level of Green Star rating achieved. An example of how rates relief could be provided/calculated is as follows:

4 Green Star	10% reduction on rates (suggested % only)
5 Green Star	20% reduction on rates (suggested % only)
6 Green Star	30% reduction on rates (suggested % only)

49. Reduced consenting fees given to Green Star certified building

Auckland Council currently charge a starting point from between \$1,500-4,000 for non-notified applications, to \$7,000 for limited notified applications and \$3,000 for hearing resource consent applications. It is at/within Council’s discretion to charge processing fees.

A discount could be given to resource consents involving buildings registered and targeting a Green Star rating. The discount could be paid to the applicant at the completion of the consent once the resource consent has been granted.

Alternatively, the consent could be issued subject to a condition requiring the building to provide evidence of a certified Green Star rating prior to Code of Compliance being issued, at which time the ‘consent discount’ payment could be made.

Other New Zealand Councils also proposing NZGBC rating tool inclusion

50. Auckland Council is not the only Council in New Zealand considering incorporating the NZGBC rating tools into planning frameworks to achieve both regional sustainable built environment goals but also the goals of the Act.
51. The Hamilton City Council Proposed District Plan originally proposed an incentive based scheme for projects which provide a “Certification for Green Star – Design (six star rating or greater) by the New Zealand Green Building Council” the permitted building height in the Central City automatically increased from 16m to 24m. Following submissions, Council amended the provision which currently is to reduce the NZGBC Green Star rating from six to five stars. The rule mechanism requires design ratings to be confirmed through subsequent Green Star Built ratings.
52. Wellington City Council have a discussion paper out (Draft District Plan) which considers discounting development contributions for buildings with Green Star Built ratings. Wellington City Council are also considering incorporating the Homestar rating tool into the District Plan in the future.
53. NZGBC has also had discussions with Christchurch City Council, Kapiti Coast District Council and Upper Hutt City Council regarding use of the NZGBC rating tools as mechanisms to improve the built environment.

RELIEF SOUGHT

New Zealand Green Building Council - Submission on the Proposed Auckland Unitary Plan (Green Star)

Specific relief sought to the Proposed Unitary Plan rules:

H.6.4 Sustainable Development 2.2 Offices Rules 1 & 2

1. A new building with a GFA of 5000m² or greater and where 80 per cent or more of the GFA is to be used as an office, must be designed ~~and constructed~~ to ~~achieve~~ achieve:
 - a. a minimum 4-~~Green Star level~~ certificated rating from the New Zealand Green Building Council Green Star Office Tool (2009), or
 - b. certification under the Living Building Challenge (2013), or
 - c. a minimum 4 star level using the Australian Green Building Council Green Star Office tool ~~(2008)~~.
2. This control does not apply to:
 - a. extensions and alterations to existing office buildings
 - b. converting an existing building to an office use
 - c. offices accessory to another use-
 - d. Offices used for medical purposes.

H.6.4 Sustainable Development 2.3 Industrial Activities Rules 1 & 2

1. A new building with a GFA of 5000m² or greater and where 60 per cent of the GFA is to be used for industrial activities, must be designed ~~and constructed~~ to achieve:
 - a. a minimum 4-~~Green Star level~~ certificated design rating from the New Zealand Green Building Council Green Star Industrial Tool (2009), or
 - b. certification under the Living Building Challenge (2013), or
 - c. a minimum 4 star using the Australian Green Building Council Green Star Industrial tool ~~(2011)~~.
2. This control does not apply to:
 - a. extensions and alterations to existing industrial buildings
 - b. converting an existing building to industrial activities
 - c. industrial activities accessory to another use.

Part 6 Non-Statutory Guidance

This part of the Unitary Plan contains non-statutory guidance.

Attachment 1 contains precinct reference documents and Attachment 2 contains non-statutory urban design guidelines for specific precincts. The urban design guidelines will be incorporated in the [ADM](#) and when this occurs they will be removed from this part of the Unitary Plan. [Attachment 3 contains the New Zealand Green Building Council Green Star Office Tool \(2009\)](#), and [Attachment 4 contains the New Zealand Green Building Council Green Star Office Tool \(2009\)](#).

General relief sought to the Proposed Unitary Plan rules:

54. NZGBC are of the opinion that the structure of the Proposed Unitary Plan is ambiguous in terms of understanding how the rules relating to Green Star office and industrial buildings are triggered.

Relief sought: The provisions relating to the Green Star tool are relocated in the Proposed Unitary Plan so that it is clear the provisions apply to all new buildings, not just those related to a subdivision.

55. NZGBC would also like to see the interaction between particular zone or overlap rules be clarified; i.e. in the CBD the activity status relating to the Green Star tools is Restricted Discretionary, however it is not clear whether the activity status drops to Controlled if the proposed building is Green Star.

Relief sought: The interaction between particular zones or overlap rules be clarified in relation to the Green Star tool.

Additional Council mechanisms

56. NZGBC consider there to be a number of additional opportunities to influence the sustainability of our built environment all of which require further work.

57. **Idea One:** Development contributions reflect reduced infrastructure demand of Green Star buildings

A development contribution discount to be given to buildings which achieve either Green Star Design or Built ratings. NZGBC believe that the exact % reduction offered could be based on research of existing green buildings to determine the appropriate level.

Development contributions, provided by the Local Government Act, are charged to pay for public infrastructure needed to meet the additional demand from growth. Green Star buildings can reduce demands on public infrastructure and recent Australian research^{iv} has shown that:

- On average, Green Star-certified buildings produce 45% fewer greenhouse gas emissions than if they had been built to meet minimum industry requirements.
- On average, Green Star-certified buildings use 51% less potable water than if they had been built to meet minimum industry requirements.

- On average, Green Star Built certified buildings recycled 96% of their construction and demolition waste.

A recent New Zealand example showed that the development contribution associated with the cost of providing roading, water supply and waste water discharge should be reduced by 67% for a building targeting a 6 Green Star rating^v.

An example of how development contributions could be provided is as follows:

4 Green Star	10% reduction in development contribution (suggested % only)
5 Green Star	20% reduction in development contribution (suggested % only)
6 Green Star	30% reduction in development contribution (suggested % only)

58. Idea Two: Bonuses for Green Star certified projects

The Proposed Unitary Plan includes a provision for ‘Bonus floor area’ to achieve encouraged, yet not prescribed, design standards such as slender building not bulky in appearance and views through the city centre. The additional floor area is subject to specified requirements.

We consider that a similar incentive based system, which encouraged development of certified Green Star buildings, could provide an optimal incentive for sustainable building outcomes across office building and industrial building developments.

Council could choose how it saw fit to establish the ‘bonus’ (e.g. additional permitted total height or floor area etc.)

59. Idea Three: Priority consent processing is offered to Green Star certified buildings

Auckland Council recently established a new fast-track consenting process via a one-stop shop to provide for the Special Housing Areas. A similar ‘fast track’ / priority service could be offered for any building registered and targeting a Green Star rating.

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NZGBC would like to be heard in relation to this submission.

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APPENDIX 1

Press Release

Accountability through transparency

TUE 26 NOV 2013 [News](#) / [GBCA news](#)

Romilly Madew, Chief Executive
Green Building Council of Australia

“Build green but don’t bother with Green Star.”

This attitude is not new. There will always be those who devalue the importance of verification and validation. But choosing Green Star is not like opting for a ‘designer label’. It is independent proof that a building’s owner – whether that’s an institutional investor or the taxpayer – got what they paid for.

As sustainability becomes inextricably linked to organisational success, many companies carefully add a green sheen to their marketing and branding efforts to demonstrate their commitment to sustainable business practices.

But how can we tell which companies are genuinely green and which ones might have applied a generous coat of greenwash?

‘Greenwashing’ (a blend of ‘green’ and ‘whitewashing’) is the practice carried out by companies dishonestly claiming that their products, services or policies are environmentally friendly. The term is generally used when more money or time is spent in promoting being green, rather than devoting the money and time to actual environmentally sound practices with long-term benefits.

Green Star certification is one way to rinse off the greenwash. You wouldn’t employ an accountant who dismissed the need for credentials, arguing that “I’ve learnt the same skills, trust me.” How can you be sure?

Would you climb into the car, or let family members climb into the car, of someone who told you “I haven’t actually taken my driving test, but I’ve got the same sort of level of knowledge”? You’d want to be sure.

“We tell our clients that third party certification is the difference between having proof that your building is green and greenwashing,” says Jane Toner, Senior Associate at Sustainable Built Environments.

“We find many local councils around Australia, in particular, are mandating that new developments must be equivalent to 4 Star Green Star benchmarks – but what does that actually mean? Without Green Star certification it means nothing,” Jane says.

Some Green Star credits lend themselves to being ‘Green Star-equivalent’ – for example there are water meters fitted or there are not. However, a large number of credits cannot be claimed as ‘certifiable’ without actually undertaking the documentation. Is the level of daylight high enough? How much better is the stormwater management than business-as-usual? Is all the paint really low-VOC?

There are numerous stories of project teams that are asked to pursue Green Star ‘benchmarks’ as a condition of a tender only to discover that the green features aren’t up to scratch or have been scaled back or even removed during the construction process.

“We tell our clients that if they want the certainty that their requirements are being met, they can’t do that without certification,” Jane says.

Green Star doesn’t just provide certainty to building owners – it also provides certainty to industry. Green Star is one set of transparent rules relevant to Australia’s unique climate, market and economy. We’ve [worked with many parts of the industry](#) to set the right benchmarks that have in turn informed development of new thinking, products, materials and capabilities.

Green Star has now been around for a decade, and has certified more than [seven million square metres of green building space](#). Green Star certification is increasingly seen as not only a measure of a building's sustainability, but as a measure of quality assurance.

"Green Star ratings have become a trusted industry hallmark of quality design, effective delivery and efficient operation. The market now talks in 'stars'," says Lend Lease's Cate Harris.

"Those investing in or occupying properties need benchmarks they can rely on," says ISPT Super Property's Chief Executive Officer, Daryl Browning. "We think Green Star certification is one of the quality assurance measures everyone can rely on with confidence."

[Trendwatching](#) might call a Green Star rating independent proof that a building is 'eco-superior': not just eco-friendly, but superior to its competitors in every possible way. It's about superior functionality, superior design and superior savings.

The [business case for green building in Australia](#) is now rock-solid – and the [global business case continues to grow](#). In our current challenging economic climate, which many pundits are claiming is the 'new normal', people are expecting more, not less, accountability. And one of the best ways to demonstrate accountability is through transparency. Increased transparency – being demanded by governments, consumers, employees and shareholders – will drive more companies to seek Green Star ratings as they seek to demonstrate their commitment to green, not greenwash.

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