

## **New Zealand Green Building Council - Submission on the draft Unitary Plan**

**May 2013**

Thank you for the opportunity to make a submission on the draft 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.

### **Who we are**

The New Zealand Green Building Council (NZGBC) is a not-for-profit industry organisation which leads green building initiatives in New Zealand. 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,
- the Homestar residential rating tool,
- the BASE introductory level green building standard for the Christchurch rebuild,
- and will soon launch NABERS NZ (the energy performance tool for office buildings) in collaboration with EECA Business.

### **General Feedback**

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.

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.

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 supports the whole-of-Council approach that strives for higher quality buildings in a sustainable built environment.

### **Sustainable Buildings Feedback**

Section 4.2.5.4 of the proposed Unitary Plan Rules proposes rules to ensure all new development containing five or more dwellings within a site, and large-scale commercial and industrial buildings are designed to:

- operate efficiently to minimise the use of energy and water resources
- contribute to minimising environmental impacts by reducing emissions
- create healthy and comfortable living and working environments.

Assessment tools developed by the NZGBC (Homestar for housing and Green Star for commercial buildings) have been proposed, as well as alternative compliance options, to establish whether a building achieves these outcomes.

There is strong evidence to support the value case for building green. The World Green Building Council recently released *The Business Case for Green Building* ([www.worldgbc.org](http://www.worldgbc.org)). This report synthesizes all the credible evidence-based research from around the world on the costs and benefits of green building. The key findings are:

- 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.
- 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.
- 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.
- 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.

- Extreme weather events and systematic changes in weather patterns affect the insurability of real estate and lead to questions about the resilience of assets.
- By greening our built environment at the neighborhood 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.

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 support the vision of more sustainable buildings across Auckland; however the practicalities of actual implementation of Council's proposals in relation to our market-based mechanisms are somewhat unclear.

NZGBC would be 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 in the time frame needed. The following feedback is provided on the mention of our rating tools:

### **Homestar**

The draft Unitary Plan proposes that for new developments containing five or more dwellings on a site, each dwelling must be designed and constructed to a minimum 6-star level from the Homestar Tool (2010).

- The 6 Homestar rating level selected by Council has been shown to be a level of good practice that is both pragmatic and affordable. There are now a number of group home builders who are building homes to a 6 Homestar level and above, proving the market has already started to recognise the advantages.
- Homestar rates the sustainability of standalone homes, terraces and apartments on an equivalent basis and is therefore a good fit for the quality compact direction of the Unitary Plan.
- Homestar has been developed to be scalable to the mass market and there is in-built capacity to assess multiple dwellings simultaneously. There are now over 125 trained Homestar industry professionals with a supportive infrastructure in place, and there is a good level of industry awareness about Homestar.
- We suggest there is greater clarity needed on the definition of five or more dwellings on a site e.g. does this only apply where resource consent is being sought for five or more dwellings at the same time, and the actual implementation of this into the market.

### **Green Star**

The draft Unitary Plan proposes that new buildings with a GFA of 5000m<sup>2</sup> or greater and where 80 per cent or more of the GFA is to be used as an office or for industrial purposes, must be designed and constructed to a minimum 5-star level from the Green Star Office Tool (2009).

- Many new CBD office buildings built in Auckland in the last five years have voluntarily targeted a Green Star rating – about half of them 5 Green Star. There is now significant industry capacity and knowledge to deliver 5 Green Star rated office buildings on a very cost effective basis.

- There have been a lesser number of office buildings attain a Green Star rating outside of the CBD, we suggest further consultation to determine applicability.
- We believe that further work is needed to clarify how this tool would be practically used during the resource consent process.
- We also believe that further work should be undertaken to engage with the industrial building sector regarding the Green Star proposal. There is less awareness and knowledge within this sector and therefore to successfully introduce this proposal will require increased capacity building.

### **Integrated and Consistent Approach**

Homestar and Green Star are both comprehensive, environmental sustainability rating tools that reward the outcome achieved rather than prescribe the solution. The tools allow the building to respond to the site and context, functionality requirements and the occupants' needs. Homeowners and building developers have some flexibility to target the criteria which suit their project best.

Auckland Council has a range of policies, rules and regulations which overlap with the areas covered within the Homestar and Green Star tools. For example the tools reward buildings which reuse greywater, minimise potable water demand, generate their own energy onsite and are well-oriented for passive heating and cooling.

To enable the market to efficiently deliver buildings to a higher sustainability standard, it is critical that there are no additional barriers or unnecessary impediments resulting from Council processes and rules.

We strongly recommend that Auckland Council undertakes an analysis which reviews the standards embedded in Homestar and Green Star against any existing or proposed rules and policies which may act as a barrier to implementation.

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