
TO: John Theodosakis
cc:
FROM: Euan Williamson, ESD Advisor
DATE: 19.01.2018
FILE: PLN17/0920 – 171 Stawell Street
SUBJECT: ESD response to Amended Development Plan

John,

I have reviewed the amended Development Plan and Sustainability Report prepared by Lend Lease for this component of the GTV9 redevelopment site. In summary, the overall standard is lower than previous Development Plan, and there some areas that I would recommend further refinement, additional detail and clarification. I have provided 5 key recommendations below (**in bold**) that I request Lend Lease address.

Green Star Rating

The commitment to a Green Star rating of 4 Stars applies only to one component of the development, the retirement living apartments. The other buildings have only vague commitments to ESD such as;

“... the majority of the principles of targeted initiatives will be applied to the aged care and residential component of the development.”

A “majority of principles” is ambiguous and does not give a clear quantifiable benchmark. This implies that no quantifiable ESD performance standard is offered in the Development Plan for the aged care, affordable housing or residential townhouse components – other than what is in the Yarra Planning Scheme for all development apps of 2 dwellings or larger.

1. Recommend that a clear commitment to ESD performance standards for all areas of the site including the residential townhouses, affordable housing and aged care components are included in the Development Plan.

It is not clear why Green Star Communities tools is not considered for the other components of the site, or the use of Green Star Design and As Built tool. If a formal Green Star rating cannot be achieved due to ownership or administration, then I strongly recommend that all components of the development still demonstrate an equivalent ESD performance outcome.

A 4 Star Green Star standard is ‘best practice’, which is equivalent to the planning’s scheme requirements for all development applicants of 2 dwellings and larger. Therefore a 5 Star Green Star rating is more appropriate given the scale of the site and the Lend Lease corporate commitment to both Green Star, the GBCA and Lend Lease’s own Sustainability Framework.

2. Recommend that a formal Green Star of 5 Star (minimum) rating is extended to all other components of the development.

NatHERS Rating & Thermal Energy Efficiency

The Development Plan refers to a “targeted 7 Star average” (pages 4, 9, 10). The term “targeted” is also ambiguous and could be interpreted to be an aspirational goal only. Please alter the wording when referring to the average 7 Star NatHERS rating.

3. Recommend re-wording to describe a clear commitment to 7 Star NatHERS, such as; “the development will achieve a 7 Star average NatHERS rating in all residential dwellings including retirement living apartments, affordable housing and townhouses”.

Furthermore, the aged care component of the proposed development and any other non-residential areas that are not suited to using the NatHERS benchmark, have no alternative benchmark provided. An additional performance benchmark for these areas of the development is appropriate.

4. I recommend that the aged care and any non-residential components not rated suited to NatHERS adopt a “minimum 10% improvement on the NCC thermal efficiency standards for the building shell”, and an additional 10% improvement on equipment and services, demonstrated through JV3 modelling prior to the occupation of the buildings.

ESD Performance Standards and Benchmarks

Overall, there are few quantifiable benchmarks or standards set in the amended Development Plan & ESD Report. Most of the statements in the report are simply credit objectives and credit descriptions copied across from the Green Star tool. They contain mostly vague principles and aspirational statements only. Given the flexible nature of the Green Star tool, this offers little value for a Development Plan. Quantifiable ESD performance standards should reference and exceed Council’s best practice standards in ESD such as urban stormwater and water sensitive urban design, and the BESS best practice standards for access to daylight and IEQ.

Given the scale of the development it would be suitable to commit to exceeding all best practice standards used in the SDAPP program and the BESS tool. These standards are currently required by all development of 2 dwellings and larger, so a larger project should easily exceed these standards and demonstrate leadership in ESD. Due to flexible nature of the Green Star tool, a 4 Star Green Star project does not necessarily meet all of Council’s best practice standards. Council best practice standards are now consistent across over 20 Victorian councils and can be found on the [City of Yarra’s website here](#), and are also used within the [BESS tool accessible here](#).

5. I recommend that other relevant ESD performance standards are included as clear commitments within the Development Plan. I recommend that these are quantifiable benchmarks that exceed existing standards required by the Yarra Planning Scheme.

If you or the applicant would like to discuss my comments or recommendation further, please contact me.

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