NZIA CANTERBURY BRANCH SUBMISSION TO DRAFT CENTRAL CITY PLAN

BUILD GREEN CHRSTCHURCH

A. STATED AIM

Draft Central City Plan Volume 2
Build Green Christchurch

Objective: To encourage and promote all new buildings within Central Christchurch to achieve significant levels of sustainability in their use of natural and physical resources.
(pg. 206)

The Branch supports this policy objective

Overview of Changes

No resource consent required for:

- Office
- Retail (Café, Restaurant, Bar, Shop)
- Apartment (3+ stories)

If enhanced environmental performance is achieved using NZGBC tools.

B. METHOD OF ACHIEVING STATED AIM

Draft Central City Plan – Volume 2
New Section 15 – Build Green Christchurch

i) Submit preliminary design PIM nominating which green build credits are to be achieved.
ii) PIM checked against NZGBC requirements and can proceed as permitted activity if it meets rules and clearly indicates how a 'pass' will be achieved.
iii) At building consent, detailed documentation is certified as a 'pass' or 'fail' by accredited NZGBC Build Green professional.
iv) If passed the certificate is provided as part of Building Code requirements.
v) If failed then the applicant is to either to modify and resubmit their design or may apply for resource consent.

C. OUTCOME OF PROPOSED METHOD

Positive Outcomes

i) Encourages positive environmental intentions & outcomes.
ii) Focuses attention on addressing issues that had previously been marginalised or ignored.
iii) Provides alternate path to avoid potential costly resource consent process.

Negative Outcomes

i) Power of decision making vested in private entity (NZGBC) without accountability or recourse which potentially contravenes the RMA Section 34A - delegation of Councils decision making
ii) Unsophisticated assessment criteria – check box approach leading to pass/fail assessment. Is there provision for the nuance of good, better, best environmental design?
iii) It is unclear what is required for a pass. Is 100% a pass and 50% a fail?
iv) The proposed $10,000 fee to find out your documents are acceptable to an 'accredited professional' is too high.
v) How is this cost calculated for different buildings & programmatic requirements e.g. car park v complex multi purpose venue?
vi) A pretty vague understanding of the key requirements to achieving 'sustainability'
vii) Simplified version of existing green star rating system lacks in depth analysis and evaluation of complex issues such as embodied energy. For example detailed comparisons of different materials in terms of embodied energy, environmental control during manufacturing, life cycle costing, carbon sequestration and transport miles.

D. Recommendations

Not enough information or detail is provided within the Draft Central City Plan for the Branch to accept or reject the Build Green Christchurch proposal. However, we make the following recommendations.

i) Registered Architects and architecture graduates by the nature of their comprehensive training and on-going professional development requirements should be automatically approved Green Star accredited professionals to assess & certify the Green Build credentials of their projects.
ii) An accountability mechanism is required for the 'NZGBC' which is a private entity.
iii) Meaningful collaboration is required between NZGBC & relevant design professional regarding the detailed development & application of criteria outlined within the Green Build Christchurch tool.
iv) Independent and unbiased assessment of materials needs to be carried out including manufacturing processes for both locally & overseas materials.
v) The requirements for buildings to be subject to assessment of Green Build Christchurch criteria by the NZGBC must be removed as this is inconsistent with RMA Section 34A, delegation of Councils decision making powers.