

DPIE Proposal (quotes from the SEPP EIE)	• Observation
<p><b>1</b> “We propose to introduce an independent pathway outside BASIX”</p>	<ul style="list-style-type: none"> <li>• BASIX was always intended to provide flexible compliance pathway</li> <li>• Industry calls for alternative pathways are, at least in part, due to failure to maintain the BASIX tool to a best practice standard over past 15 years</li> <li>• Any alternative pathway options must set the same numerical standards as are embedded in the (updated) BASIX calculation engine for key elements (energy, water, waste)</li> </ul>
<p><b>2</b> “Provide, as part of DA, a report and supporting documentation to demonstrate the development’s design meets performance requirements.”</p>	<ul style="list-style-type: none"> <li>• On line tool-with-calculator or on-line template approach are the only acceptable ways forward – long format narrative reports are unacceptable</li> <li>• CoS has recently terminated submission of narrative ‘ESD Reports’ due to ineffectiveness (lack of clarity around commitments and performance) – see <a href="#">here</a></li> <li>• Narrative reports submitted for many State Significant Developments</li> </ul>
<p><b>3</b> “Documentation prepared by a suitably qualified professional such as a member of the Australian Institute of Architects or Engineers Australia, or a Nationwide House Energy Rating Scheme (NatHERS) accredited assessor. This assessment would be done instead of completing a BASIX assessment.”</p>	<ul style="list-style-type: none"> <li>• Even alternative pathways must still use the BASIX tool to enter fundamental information (dwelling address, number of buildings, number of dwellings etc)</li> <li>• Architects have widely disengaged from design for environmental performance: DPIE will have to provide extensive training &amp; briefings to re-set acceptable standard – CPD component essential</li> <li>• Qualified engineers acceptable, but again must have CPD points in ‘BASIX alternative assessment’ before being approved to submit documentation</li> <li>• NatHERS Assessors (without engineering / architecture quals)– <i>NSW should not open the door to a sector that has consistently used non-compliant modelling practices</i> until the federal government deliver proper audit and governance framework for the NatHERS Scheme</li> </ul>
<p><b>4</b> “Applicant has a range of different options to demonstrate the development meets the sustainability performance requirements and can choose the approach that best suits their needs”</p>	<ul style="list-style-type: none"> <li>• Must set the same numerical standards for key elements (energy, water, waste) irrespective of pathway i.e. all pathways use comparable base calculations and ‘rules’</li> </ul>

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<p><u>5</u>  “ensuring assessment is rigorous – we propose to specify qualification and accreditation requirements for assessors, and design an audit process for such assessments”</p>	<ul style="list-style-type: none"> <li>• An audit program was provided for DPIE in 2013 - but never implemented</li> <li>• See (4) above</li> <li>• <u>Acceptance of any tool must pass ‘fit for purpose test’: -- delivers performance intent, with evidence base, strong-predictive reliability, transparent ,with government intervention controls when poor practice detected</u></li> </ul>
<p><u>6</u>  “We propose to specify the format of reports so councils and certifiers are provided with details of each assessment. This is important to ensure the building’s commitments can be checked by building certifiers at the construction and occupation certificate stages”</p>	<ul style="list-style-type: none"> <li>• On line tool / template approach is the only acceptable way forward – <u>long format narrative reports unacceptable</u></li> <li>• Our understanding is that Design and Place SEPP is going to establish this approach for many other parts of assessment process anyway – so consistency is required across the SEPP</li> <li>• <u>In 2004- BASIX Certificate set a new and high bar for plan-marking and compliance checking – the failures since then are due to poor governance and almost nil auditing – but the certificate itself is robust, and widely acknowledged as such (including in national dialogue on compliance that the City has been part of</u></li> </ul>
<p><u>7</u>  “maintaining data from such assessments – we will develop a new process to capture the most important data from any developments using the merit assessment pathway”</p>	<ul style="list-style-type: none"> <li>• As above – Alternative Pathway must still use front and back end of BASIX data entry process, and the BASIX Completion receipt mechanism should apply to all new residential development irrespective of compliance pathway used</li> </ul>

# Fundamental Requirements of any change to BASIX Compliance Pathways / Alternative Pathways (A.P.s)

- **Must demonstrably lift compliance standards compared to current outcomes**
- **Consistent numerical standards/calculations** for Water, Energy, (Embodied Energy?), across all pathways
- **On line data entry / data capture** for key inputs
- **A.P.s Must still enter headline data into BASIX** – ('front 2 pages') and maintain BASIX Completion Receipt obligations for Alternative Pathway
- **No long form narrative 'ESD reports' acceptable** as evidence of compliance
- **Only professions recognised within the NSW Building Professionals Legislation** should be approved to perform assessments
- **The Governance and Audit Scheme, and outcomes reporting needs to be much more transparent than current BASIX scheme provides**