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AUSTRALIAN INSITUTE OF ARCHITECTS (the Institute) &

AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS (AILA)

ON

NATIONAL URBAN POLICY - CONSULTATION DRAFT

The Australian Institute of Architects (the Institute) and the Australian Institute of Landscape Architects (AILA) (The Institutes) welcome the Federal Government's release of the draft National Urban Policy, and the opportunity to comment on the draft and to contribute to the development of this urgent piece of national policy.

The Institutes agree that the draft policy articulates, at a high level, the fundamental issues that need to be addressed in developing and delivering a comprehensive national urban policy framework. However, there is a noticeable gap in how the document is framed, and that is that cities need to be designed (as well as planned) to be livable, equitable, productive, sustainable, and resilient. Australian communities deserve great 3-dimensional urban design to deliver community and environmental benefits to all.

This critical dimension of city-making is not sufficiently recognised in the principles or objectives of the policy. This is of concern, as implementation behaviours flow from the framing of national policies through entire industries, and so to achieve policy outcomes, design must be placed next to planning, at the highest levels of the document and more strongly emphasised throughout.

Why Urban Policy is Needed

Australia's population has now reached over 27 million, around 18 years earlier than many predicted. By 2050 the population is expected to be almost 36 million[1]. Questions are being asked about how and where we are to house the expected extra 5 million inhabitants.

[1] https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/BriefingBook43p/futurepopulation

As the Australian population grows, there is an ever pressing need to increase the density of our urban spaces. Australian cities are amongst the least dense in the world, with Melbourne at a density average of 1,500 people per Km2 ranked 955th for density and Sydney at 1,900 people per Km2 ranked 936th[2].

We support the policy's stance on livability and acknowledge that there is a compelling case for making cities more compact. In making our cities more compact, Australians will continue to expect high environmental quality, comfort, and connection to the outdoors, and this challenge will need to be addressed through design.

While our cities were initially well planned and documented, in the century since federation, many have exploded well beyond their initial limits, mostly in ad-hoc ways. This patchwork development approach leads to an urban fabric that is disjointed, lacks cohesion, and fails to integrate buildings, people, and nature. Few, if any, cities in Australia have a collective strategy for design.

We need to get our urban policies right or we risk making our cities worse not better. We need to get back to designing our cities.

Place-Based Design – the key to getting urban policy right

Design is a tool to solve complex problems collaboratively for innovative, place-based solutions.

Design is not just an aesthetic ideal. Good design is about practical solutions to problems and attention to good societal outcomes. It is about putting the user experience at the forefront, understanding how people live, use space, and connect. It is also about how nature impacts the built world and how the built world interacts with nature. It is about bringing these elements together and asking how we can do this well. It should also be place-based, not a one-solution-fits-all approach. Australia's urban spaces are characterised by different social, environmental, and historical contexts. Design needs to embrace these place-based differences.

Design should be embedded into the principles of the National Urban Policy (NUP). Design, at its best, is a collaborative process that brings together a variety of skills, not just architects and landscape architects but also engineers, planners, and others.

Good design is well-documented and can be tested by planners and communities against complex sets of objectives. Good design can be tested as to how it integrates into the community, how it improves the liveability of residents and others, and how it flows naturally into its environs.

Design is an essential success factor for modern cities and densification.

Governments at all levels are faced with the challenges of creating increasingly dense urban settings – increasing the density of buildings and urban populations. Density helps to reduce urban sprawl and the

[2] https://www.spacer.com.au/blog/population-density-how-does-australia-compare-to-the-rest-of-the-world#:~:text=When%20measuring%20the%20population%20against,has%20only%203%20persons%2Fkm2.

urban footprint, preserving and revitalising nature spaces. It reduces the cost to governments of extending trunk infrastructure such as roads, mass transport, water, sewerage, and power and distributing services such as hospitals to ensure timely access for populations. It is predicted to increase the affordability of dwellings and even increase the return on investment for many of these assets. It can create operational efficiencies for goods and services in the way they are distributed, supplied, and accessed.

However, by increasing density, local amenities must also be improved in a way that reflects and makes the best use of that density. It is more than just adding new residents to old areas and is not an infrastructure cost-free means of increasing population. The impact of new residents on roads, parking, transport, schools, and other forms of infrastructure must still be considered and funded. Adding more young families with children, for example, will require planning how that impacts existing schools, and what kind of green and blue spaces are required.

Design is vital to getting densification right. Design moves beyond the building to the areas around it, how new residents impact traffic flows (pedestrians, cars, public transport), how buildings impact and are impacted by nature (particularly flooding), and how residents interact with work and play.

Most importantly though, densification increases the importance of the public realm.

The importance of the public realm

Mistakenly it is often thought that design pertains to only specific structures or buildings, but good design is also about what is not built, where buildings and structures are located, and how they relate to and interplay with each other.

Specific attention to designing the public realm is essential for highly liveable and sustainable cities and urban settings. Even a building that has no setback from its street boundary is creating a public realm.

As Australia's urban environments increase in density, they will increasingly be dependent on the public realm for recreation and connection, this will require greater thinking about how green and blue spaces are designed for physical and mental wellbeing.

The suburban streets, parks, and backyards have been places where children learn to skate or ride a bike, where basketball, handball, or cricket are played, and where the dog plays with a ball. People will not and should not be expected to give up such simple pleasures of life because they acknowledge the need to live in a dense urban space.

Design is key to how to make the most of personal and shared spaces in urban environments. It requires an integrated way of thinking that focuses on how this can be done in the limited spaces available. Furthermore, the public realm must also be placed-based and specific to local needs, not transplanted or directed from above.

Not leaving the public realm to chance or the beneficence of developers.

Developers and private landowners cannot be consistently relied upon to return these public or even semi-public spaces to residents and neighbourhoods. The public realm needs to be designed through master planning to ensure equity of access.

The Urban Design Forum in its positioning paper on Victorian planning reform[3] has described the problem as follows,

> Housing projects are focused on plot-by-plot development, resulting in increased density, but little to no improvement to the public realm or sufficient contributions to local community infrastructure. This creates resistance from existing communities who feel the contribution of increased housing is only negative with existing infrastructure straining to cope with increased population growth. We need to match housing growth with investment in the neighbourhoods where it is located. We need to get to a point where the community wants housing growth in their neighbourhoods because of the benefits it delivers. (p3)

Governments must find ways to then free up the privately held or government-owned land through mechanisms such as mandated planning provisions and design standards, compulsory land acquisitions, incentives for multiple asset holders to assemble land parcels, indelible zoning, and open space quotients that survive changes of government, and development levies tied to open space acquisitions.

The Institutes would welcome the opportunity to work with the Federal government and others to set city green and blue infrastructure/nature-based targets. Australian Standard SA HB 214:2023 Urban Green Infrastructure — Planning and decision framework would be a good place to start the development of such targets as would the GANSW Biodiversity in Place report[4].

Government's role in diminishing public realm.

The private sector is not alone in diminishing the importance of the public realm in our cities. Governments at all levels have shown an unfortunate willingness to degrade public space for their own needs. A recent example is the South Australian Government's proposal to annex part of the historic Adelaide parklands, much of which is national heritage, listed to build a major new tertiary hospital[5]. Greenspace is difficult to reclaim once built form has been established and right now with climate change, greenspace in semi-arid environments is critical for health and liveability.

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[3] Urban Design Forum Australia – positioning paper. Victorian planning reform: Re-framing urban design at the heart of liveability. September 2023. Sourced from https://udf.org.au/research-advocacy/

[4] GANSW Biodiversity in Place Issue no. 01 – 2024 https://www.planning.nsw.gov.au/government-architect-nsw/policies-and-frameworks/biodiversity-in-place

[5] The Thebarton Police Barracks part of the Adelaide Parklands, proposed for the new hospital have been an exclusion from the national heritage register and only state heritage listed. https://www.abc.net.au/news/2022-11-01/sa-new-wch-legislation-passes-upper-house/101604330

Therefore, state and local governments need to demonstrate very strong leadership such as the 2050 outcomes for public space that have been established under Direction 3: Public places for all in the City of Sydney's Community Strategic Plan for Delivering Sustainable Sydney 2030-2050[6] At the core is design achieved through considered investment in master planning.

Public perception and how design can ease concerns about densification

Density does not reflect the traditional housing ideals of most Australians. The detached home, with a backyard for the kids and animals, is still the ideal home for many, even though it is an increasingly unaffordable ideal.

The challenge for governments is to attract people to live in densely populated urban places. It is not a matter of "build it and they will come". To change the perception that many have of densified living (either for their own needs or that of their community) will require apartments, townhouses, and other forms of denser living to be well designed, built to last, and sit well in their location.

Good design makes people realise they don't necessarily need more space, rather they need space that is designed for their needs, that makes them feel welcome and that is connected to a community they want to go out and explore.

Design can provide governments with a means to attract people to live in more densely developed housing. People need to see and experience good design before they are likely to change their minds on what they need. Good design requirements are a tool that needs to be applied at all levels including:

- individual occupancy units such as a single apartment or townhouse,
- a development at the level of a whole apartment or townhouse complex
- the immediate neighbourhood realm
- whole urban precincts

Good design frameworks are also necessary because they are the only bulwark against commercial interests to lower costs, reduce amenities, and cram as many in a space as possible. The dominance of this discourse, we would argue, is what has created a public backlash and poor perception of densified living. Without including design as part of the urban policy matrix, we risk repeating the errors of the past.

We have also seen what happens when design is not a core requirement. Poor-quality housing that requires significant rectification, housing that does not reflect local housing needs, and yet prices out many potential buyers because it is primarily focused on developers' returns, not long-term societal needs.

[6] City of Sydney 2022. Community Strategic Plan Delivering Sustainable Sydney 2030-2050. Sourced from: https://www.cityofsydney.nsw.gov.au/strategies-action-plans/community-strategic-plan

Therefore, to create more dense urban environments for our growing population, place-based design must be a fundamental pillar in NUP, not an afterthought or "nice to have".

Safety.

All urban spaces must be safe places for people to live, work, walk, and enjoy life. Unsafe places deter community building, they keep people confined to their homes, depress economic activity, and deter investment.

The policy paper notes that over 50% of the population (women and girls and others) are marginalised when it comes to our urban spaces being safe or perceived as safe indicates a major failure of city planning and urban design policy in the past. This indicates we have got things drastically wrong.

Therefore, safety cannot be considered a secondary (or lower order) element in the Urban policy. Design practitioners understand that how an urban environment is designed and built impacts safety and perception of safety. If we want families to move to and live in urban environments, they will only do so if they feel safe for themselves, their children, and others in their community.

Designing in greenhouse gas abatement

It is estimated that 75% of greenhouse gas emissions are emitted by cities globally. Carbon budgets must be manifest in a NUP. The policy's objective is that our urban areas are sustainable and its proposed actions are laudable. Without a design lens and an integrated holistic approach, this will be impossible to achieve.

Addressing greenhouse gas and carbon abatement requires a range of stakeholders across industry, government, and private citizens to all play a part and be held accountable. Targets are only useful if they are achievable and enforceable.

GHG and $C0_2$ Carbon and GHG reduction targets need to be understood not simply as a cost to be factored in. Instead, the narrative needs to be upended to focus on the economic and competition benefits that can be achieved by not just achieving these targets but leading in the development of the technologies, methods, and designs that all the world will need.

Design is as critical as fabric in addressing both greenhouse abatement, but also making our homes comfortable as our climate worsens. It is about designing that minimises waste by maximising the usability of space (including multifunctional spaces), using natural light and ventilation to reduce energy needs, and understanding how people interact with their built environment.

Design integrity is not a risk or cost to reduce.

Throughout the process of delivering urban spaces, there are financial pressures to minimise costs and get things built quicker, with little regard for long-term quality, the public realm, or the integration of liveable cities.

Developers' attention in apartment development during planning and development applications can be to maximise apartment dwellings, often with minimum return to the public realm and maximising storeys (uplift).

During construction, particularly where novated design and construct procurement is used, the contractor will seek to minimise construction costs through value management processes that diminish the original design intent. This may include internal and external finishes and features that end up not performing as well as the original design. Buildings constructed with diminishment of the original design intent quickly deteriorate and detract from the public realm.

While it is natural for commercial organisations to seek to minimise their costs, where this creates a loss to amenities, quality, and, particularly, the public realm, the government has a role in standing firm on quality. If the government does not recognise and protect design quality, it risks undermining the purpose of a NUP and perpetuating the downward slide of our cities in terms of liveability, social inclusion, and affordability.

We encourage the Government to review the previous National Cities Performance Framework and use it as a basis for developing a comprehensive city performance framework.

The Federal government can help to protect design integrity through:

- working with State / Territory and local governments (and the relevant government architect) to develop precinct-level design guidelines that reflect local needs, conditions, and heritage
- working with State / Territory and local governments (and the relevant government architect) to develop precinct-level guidelines that protect and uplift the public realm
- Support State / Territory and local governments (and the relevant government architect) to use Design Review Panels (DRP) that are integrated into precinct-level design guidelines to ensure design excellence and efficient processing of development projects of high-quality outcomes
- legislation, regulations, and by-laws that encapsulate strong design requirements
- initiatives that reward design excellence, uplift the public realm, and high environmental standards
- strategic partnerships with sectors to promote exemplary examples of urban design
- processes of audit and inquiry to ensure the quality and robustness of our urban spaces
- Federal Government as exemplar client mandating the highest design standards for its projects
- Addressing Deemed to Comply requirements in the National Construction Code
- Draw on the upcoming State of Australian Cities report

- Create nationally recognised awards for design excellence in the urban space that celebrate and encourage highly functioning urban spaces

Importance of performance targets and metrics.

Performance targets and metrics are particularly important to direct planning and to create the performance objectives (measured through acquittal processes) for government funding such as the Australian Government's Urban Precincts and Partnerships and Thriving Suburbs programs.

Governments should also be brave enough to change direction should the data reveal that current policies are not achieving their targets and expected outcomes.

The effectiveness of the NUP should be measured not in terms of the number of buildings built, they should be based on outcomes for the cities and their residents. These measures could include:

- economic and productivity gains
    - measuring the benefits of measures that reduce car dependency such as living closer to work and/or public transport hubs, cycling paths, and end-of-trip facilities.
    - The benefits to measure would include impact on traffic congestion, wear and tear on roads, health benefits from reduced pollution, and healthier lifestyles.
- social inclusion
    - measuring the benefits of increased participation in the community when well-designed apartments, neighbourhoods, and communities provide.
    - The benefits to measure would include impacts on loneliness, community inclusiveness, opportunities for interactions, social cohesion, and anti-social behaviour.
- liveability
    - measuring the benefits of well-located social and affordable housing, readily accessible recreational green spaces and community facilities, raised bus and tram platforms as well as the availability of quiet spaces in public places to respond to the neurodiversity across the population.
    - measuring how accessible and inclusive design assists people of all abilities to feel they are recognised and are afforded a chance for social and economic inclusion.
    - The benefits to measure would include impacts on the feeling of inclusiveness and the accessibility and useability of a place.

- equity
    - measuring the benefits of including design elements that improve social equity such as shared study spaces, community washing and cleaning spaces.
    - Measuring the benefits of building social and affordable housing located close to work, education, childcare, and government service providers.

Specific Changes Recommended to the National Urban Policy

Taking the above comments on board, the Institutes would like to see the following be either included or given greater prominence in future versions of the NUP:

1. The Federal Government to establish a Federal Minister for Cities.
2. Place-Based Design be embedded into all of the principles in the draft policy.
3. A requirement that cities and other urban environments be planned and regularly reviewed.
4. Place-based/precinct-level design guidelines that are adapted by an inclusive collaboration of peer professionals including relevant government architects, architects, landscape architects, planners, engineers, and others.
5. Focuses on residents, livability, wellbeing and inclusion.
6. Ensures an ongoing role and prominence for community groups and design professionals to counterbalance those whose primary focus is commercial.
7. Promotes densification in a way that makes dense urban living an attractive option for all ages.
8. Recognises, protects, and enhances the public realm, walkability and active transport.
9. Recognises the role of collaborative design in creating successful innovative urban environments – that is having planners, design experts (architects, landscape architects, engineers, etc.), and local government working together to create our urban spaces.
10. Sets minimum standards but allows for design excellence to be encouraged, rated, reviewed and rewarded.
11. Sets and enforces high standards in relation to carbon abatement.
12. Focuses on the safety of our urban spaces for all users.
13. Incorporates modern data and understandings of the interaction between nature and our urban environments that:

a. Builds capacity for adaptive, resilient design that can withstand all natural hazards.

b. Prevents building in areas of increasing coastal inundation and flood hazards.

c. Recognises and adjusts for natural and increasing water flows and incorporates water capture for drought.

d. Understands the importance of green and blue spaces in maintaining livable temperatures.

e. Incorporates design for biodiversity into buildings to enhance urban life.

f. Is developed in a bi-partisan way so as to survive changes in Government.

g. Draws on the soon-to-be-released State of Australian Cities report.

14. Works with Government Architects at all levels.

Sincerely,

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Working Committees:

- AILA Biodiversity Positive Design Working Group
- AILA Climate Positive Committee