

Hon Steven Miles

Deputy Premier, Minister for State Development, Infrastructure, Local Government and Planning and Minister
Assisting the Premier on Olympic and Paralympic Games Infrastructure
Shaping SEQ 2023 Update Project Team
Department of State Development, Infrastructure, Local Government and Planning
PO Box 15009, City East QLD 4002

Submission: Australian Institute of Architects (Queensland Chapter)

Response and Recommendations Regarding the draft Shaping SEQ2023 Update

Dear Deputy-Premier, Honourable Minister Miles

We wish to provide feedback on the draft Shaping SEQ2023 Update and welcome further conversation at your convenience.

ABOUT THE INSTITUTE

The Australian Institute of Architects ('the Institute') is the peak body for the architectural profession in Australia. We are an independent, national member organisation with over 14,000 members across Australia and overseas.

The Institute is committed to raising design standards and positively shaping the places where we live, work, and meet. Along with our members, we are dedicated to improving our built environment and the communities we call home by promoting quality, responsible, sustainable design and advocating on behalf of the profession for the benefit of all Australians.

DRAFT SHAPING SEQ2023 UPDATE – RESPONSE

The Institute supports the broad direction of the plan, particularly the focus on the housing crisis, strengthening the integration of land use and public transport, introducing additional measures for housing density, stronger recognition of First Nations peoples and their connection to Country, and updating the plan in response to developing evidence bases for the planning of our region.

We acknowledge the core purpose of the document to provide strong coordinated strategic direction to SEQ local governments in the preparation of their planning schemes, and as such is not a detailed implementation document of the policies and vision expressed.

The Institute shares government's deep concern regarding the current housing crisis, and support Shaping SEQ's emphasis on housing supply. However, in the urgency of response it is critical that State Government place an equal and urgent emphasis on design quality and the creation of liveable communities. We also raise concerns that affordable housing, which may simply equate to incentivising or facilitating greater housing choice and diversity, represents only a small portion of the housing supply goals at about 10%.

There are key areas where stronger state-based guidance and clarity needs to be provided to ensure the 'on the ground' outcomes align with the vision and objectives of Shaping SEQ.

RECOMMENDATION 1: GENTLE DENSITY AND DWELLING DIVERSITY

The Institute strongly supports promoting gentle density and dwelling diversity targets as appropriate responses to growth pressures and the supply crisis. Of greatest concern to the Institute is how this is achieved on the ground. Delivering density and diversity, speedily, to the standards of amenity and livability envisaged in Shaping SEQ is a significant step change for an industry geared to volume building of detached dwellings or apartments. With the former, greater technical and design skill is needed as the density of the Class 1 typology intensifies, while the delivery of Class 2 apartments will not provide the affordability outcomes needed.

Greater delivery skill is needed, and ways of incentivising the participation of architects in consumer housing would facilitate the availability of that skill. In addition, more fully qualified design professionals are needed in local government to assess and articulate desired outcomes. We have witnessed over the years very poor liveability and building quality outcomes where there is a lack of skill or knowledge about how to do density well – in terms of both design and building delivery.

To counter the probability of poor liveability and amenity outcomes due to a lack of capacity, the Institute urges the following:

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- a) The Institute strongly recommends that the State works with the Office of the Queensland Government Architect to provide local governments much stronger and more detailed urban, architectural and landscape design guidance on how to do density well. This includes how to tie density targets to social and community outcomes, and ensure that site, dwelling, and landscape design achieve appropriate passive climatic, low energy, high amenity outcomes.

 - b) The Institute strongly recommends that the State provide local governments with the appropriate resourcing and training in architecture, to improve amenity outcomes for dwelling diversity, including overarching guidance for planning assessment officers and planning scheme authors, and specific design resources. One way of accomplishing this goal is to encourage local authorities to appoint a city architect, though the Institute acknowledges that this goal is outside the scope of the SEQ Regional Plan.

 - c) The State work closely with the Institute, the Office of the Queensland Government Architect, the Department of Housing, Housing Industry associations and property development peak bodies (such as PIA, UDIA, and PCA) to build capacity in delivering and designing more diverse housing forms that deliver desired community and liveability outcomes.

 - d) The Institute urges the State to develop its role in providing models of quality, highly livable, higher density housing to further support a change on the demand side for higher density living, demonstrating its attractiveness. The development and construction industry, especially in housing, is naturally (and justifiably) conservative. It is reluctant to change its products that have provided financial success. This reluctance to change, however, limits choice for consumers to industry products. This is a complex area which requires the development and testing of new planning regimes and housing models.

 - e) The Institute understands that most housing, historically 96%, is delivered by the private sector, and that profit motives are an essential component of the housing delivery matrix, and we congratulate the State on recognising the significance of this issue on the supply of diverse and affordable dwellings in good locations. However, it is from our deep appreciation of on the ground outcomes and the impacts of planning regulation that we suggest that smaller Class 1 dwellings, the ones that are most affordable to deliver, need to be more incentivised in the private sector. Although the high cost of construction and the scarcity of builders in the apartment sector are
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becoming a clear economic mandate to promote more smaller detached homes to share the load of gentle density, Shaping SEQ has not sufficiently removed the planning barriers to, nor provided sufficient positive rewards for, building less. In fact, continually uplifting height with density risks a 'Peter Principle' outcome where land is 'promoted' beyond its level of development 'viability', and becomes sterile until market prices rise sufficiently, thereby being a direct frustration to affordability targets (take Coomera, as an example). Following are some suggestions the Institute would like to share that would incentivise low-height, 'timber and tin' gentle density: 1. Provide a form-based design code to unlock the yield of three to four small dwellings in suburban areas where otherwise one larger dwelling would sit; 2. Measure density in bedrooms rather than dwellings; 3. Increase density without increasing height; 4. Consider permitting Secondary dwellings in Dual occupation developments; 5. Mandate an aspirational 'maximum' minimum lot size throughout the state of, say, 350 sq m; and, 5. Provide clarity that back-to-back built-to-boundary dwellings utilising a High Density Development Easement (HDDE) are 'detached' dwellings, thereby removing some of the financial industry barriers to these homes being delivered through the affordable and diverse house and land package model.

- f) Further to the above suggestions, particularly about encouraging density without extra height, it is worth to note that the term 'gentle density' might still cause some unease in the community. In a similar context, the NSW Low Rise Medium Density Housing Diversity Code was reviewed recently with a suggestion arising that it be renamed the "Two Storey Housing Diversity Code", with the notable changes being very specific about height, and removing the term 'density'. Although we are not necessarily advocating for a change of language, we wish to draw attention to the reaction of the public to any ambiguity about height.
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RECOMMENDATION 2: ENSURING 'GOOD DESIGN' MAKES GREAT PLACES AND COMMUNITIES

Providing more housing at speed to meet demand needs to be matched with equal urgency to ensure those communities are well-designed. Our concern is that references to "speed" and "removing restrictive planning regulation" can be invoked as reasons for poor urban design and dwelling design outcomes at a local government level.

The Institute's concerns with design quality and sustainability are founded on an understanding of the benefits these qualities have for peoples' lives as well as on empirical evidence of the outcomes where design and sustainability have been lacking. While we build housing, we also make communities and utilise resources, and we must consciously choose to do that in a way that forms community and sustainable environments rather than baking in social disadvantage and environmental degradation through poor design.

The Institute strongly supports Shaping SEQ's promotion of 'good design' in the document as critical to the amenity of our region. The Institute notes that experience in other states shows that achieving 'good design' requires a commitment across State and Local Government to ensure design proposals can either be assessed and reviewed by or designed and administered by design-trained professionals without increasing uncertainty or delay, and sometimes even reducing red tape and assessment timeframes.

- g) The Institute urges the State to emphasise in all its communications with local governments and industry stakeholders the importance of engaging with architects, urban designers, landscape architects, and a range of properly qualified design professionals to make liveable and sustainable communities throughout SEQ.
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- h) The Institute encourages the concept of supporting good design to underpin Gentle Density. Good Design is referenced in the draft plan primarily in the context of 'urban design'. If Gentle Density is going to be implemented, it needs to be done well, not only in a 'design for

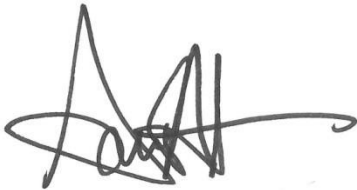
climate or sustainability' context but done well in the context of the site the Gentle Density development is located (i.e., local context is critical). The fine grain urban design context is an architecture that needs to be valued.

CLOSING STATEMENT

The Queensland Chapter of the Australian Institute of Architects urges State to put considered holistic design at the centre of the Shaping SEQ strategy, to ensure we make liveable, healthy, and sustainable communities well into the future. Increasing the participation of architects and allied design professionals in the planning, design, and delivery of built form in Queensland is critical to this endeavour.

The Institute, the Queensland Chapter, and the architects listed below – to whom I owe a dept of gratitude for their hard work in preparing this submission – would welcome the opportunity to assist the Department in implementing any of the recommendations noted above.

Yours sincerely



Amy Degenhart LFRAIA

Queensland Chapter President

Australian Institute of Architects