

# 2024-25 PRE-BUDGET SUBMISSION



**AUSTRALIAN GOVERNMENT DEPARTMENT OF THE TREASURY**

[prebudgetsubs@treasury.gov.au](mailto:prebudgetsubs@treasury.gov.au)



**Submission issued January 2024**

2024-25 Federal Pre-Budget Submission

## INFORMATION ABOUT THE INSTITUTE

---

- The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with more than 14,500 members across Australia and overseas.
- The Institute's vision is: *Everyone benefits from good architecture.*
- The Institute's purpose is: *To demonstrate the value of architecture and support the profession.*
- At the time of this submission the National President is Stuart Tanner FRAIA and the Chief Executive Officer is Cameron Bruhn.

### Contact details for this submission:

---

Australian Institute of Architects  
ABN 72 000 023 012  
Level 1, 41 Exhibition Street  
Melbourne, Victoria 3000  
p: +61 (03) 8620 3877  
Name: Reece Agland | National Advocacy and Policy Manager  
Email: [reece.agland@architecture.com.au](mailto:reece.agland@architecture.com.au)

*The Australian Institute of Architects recognises the unceded sovereign lands and rights of Aboriginal and Torres Strait Islander peoples as the First Peoples of these lands and waters.*

*This recognition generates acknowledgement and respect for Aboriginal and Torres Strait Islander Countries, Cultures and Communities, and their ways of being, knowing and doing.*

*Caring for Country practices including architecture and place shaping have existed on this continent since time immemorial.*

*The Institute recognises a professional commitment to engage and act meaningfully through reciprocal partnership and relationships with Aboriginal and Torres Strait Islander peoples.*

*Together we will support and develop the emergence of new possibilities for our shared future.*

## About the cover photo

---

Research School of Physics Stage 1 Building, Australian National University. The Australian Institute of Architects' 2023 2 Enrico Taglietti Award for Educational Architecture Hassell. Traditional Land Owners: The Ngunnawal and Ngambri peoples of the Ngunnawal-Ngambri country. Photographer: John Gollings.

For further information visit: <https://architectureau.com/articles/act-architecture-awards/#:~:text=Brindabella%20by%20Bates%20Smart.&text=A%20business%20park%20that%20has,Awards%2C%20announced%20on%203%20June.>

## THE INSTITUTE'S 2024-25 FEDERAL BUDGET RECOMMENDATIONS

### 1- DESIGNING AND DELIVERING LOW CARBON BUILDINGS

**Recommendation 1.1:** Invest \$50 million for targeted professional development and skills training across a range of disciplines in energy efficiency and condensation mitigation.

**Recommendation 1.2:** Invest \$500 million fund to:

- fund net zero building materials research
- assist the University and TAFE sectors to commercialise their research into net zero building materials
- support the investment required for the local manufacture of net zero building materials.

**Recommendation 1.3:** Invest \$10 million to research and develop a specific design guideline to promote adaptive re-use and retrofitting of existing government buildings to reduce carbon emissions and landfill waste.

### 2- CRITICAL DATA FOR CLIMATE CHANGE ADAPTATION

**Recommendation 2.1:** Invest \$50 million to fund the Australian Climate Service to develop Improved national datasets and detailed maps of natural disaster and climate-related events risks across Australia.

### 3-HOUSING AS A PRIORITY

**Recommendation 3.1:** Invest \$4 billion over four years to 2028 to fund a co-designed national housing deal with First Nations communities, delivering 8,000 new indigenous social housing dwellings.

**Recommendation 3.2:** Housing Australia to be tasked with developing a database on suitable and available Federal Government land that can be earmarked for new housing.

**Recommendation 3.3:** Fund an additional investment of \$10 billion in the Housing Australia Future Fund.

**Recommendation 3.4:** Ensure Housing Australia funding is conditional upon:

- Development approval by multi-disciplinary design review panels.
- Minimum 8 Star energy efficiency standard
- No gas appliances
- Design by an architect.

**Recommendation 3.5:** Housing Australia fund \$10 million to commission a social housing pattern book via a design competition.

### 4-ENSURE AUSTRALIA HAS A DIVERSE AND EXPERIENCED ARCHITECT WORKFORCE IN 2030

**Recommendation 4.1:** Invest \$120 million in diversity, inclusion and equity training.

**Recommendation 4.2:** Invest \$500 million over 5 years to fix the gender pay gap, improve the representation of women in design and construction, and retain female participation in the design and construction workforce.

**Recommendation 4.3:** Invest \$50 million over 5 years in education to encourage First Nations Australians to embark on a career in built environment design through courses in planning, architecture, landscape architecture, and interior design.

## **5-MAKE PUBLIC BUILDINGS ACCESSIBLE FOR PEOPLE WITH DISABILITIES**

**Recommendation 5.1:** Commit funding of \$150 million over three years for a national accessibility upgrade program to retrofit existing public use and community buildings.

# DETAILED EXPLANATION OF RECOMMENTIONS

## 1 DESIGNING AND DELIVERING LOW CARBON BUILDINGS

Addressing climate change is the policy priority of our times. Reducing the carbon intensity of Australia's energy supply through renewable energy resources will significantly reduce the carbon impact of the built environment, it is not sufficient on its own to reach our commitment to net zero emissions. The built environment is a significant contributor to CO<sub>2</sub> emissions.

Globally, the built environment contributes to 40% of all emissions. This is made up of two main components:

- 1) the operational carbon emissions arising from the production of energy needed to heat and cool buildings (27%) and
- 2) the embodied carbon resulting from construction (13%)<sup>1</sup>

The built environment can, therefore, reduce its carbon footprint by addressing these two major contributing factors of operational emissions and embodied carbon.

### *Operational carbon*

To reduce operational emissions Australia needs to rely less on adding solar systems and energy-efficient air-conditioning to buildings and design buildings for greater passive energy efficiency.

According to Australian Sustainable Built Environment Council (ASBEC):

Buildings account for over 50% of electricity use in Australia and almost a quarter of its emissions. The built environment presents some of the lowest cost – and largely untapped – emissions reduction opportunities.<sup>2</sup>

There are many aspects of building design, such as siting, wall and roof systems, shading, passive ventilation, and selection of building materials that can reduce the operational emissions (and occupants' costs) for heating and cooling.

Better designed buildings that perform well passively require less costly installations of heating and cooling appliances and fewer solar panels to offset poor building performance. More efficient buildings, also result in less surge demand on our energy networks during heat waves and cold weather episodes.

More recently, the problem of condensation has been recognised internationally and in Australia. Condensation is consequent to both regional and local climate conditions and can be an unintended consequence of sealing and insulating buildings to improve energy efficiency. Condensation can create serious health problems for building occupants, such as mould growth and can degrade building structures through processes such as rot and corrosion.

The Energy Efficiency Council and ASBE, in their 2021 report<sup>3</sup> on insulation, noted that:

---

<sup>1</sup> Why The Built Environment? <https://www.architecture2030.org/>

<sup>2</sup> [https://www.asbec.asn.au/211025-asbec-five-ways-cop26-advocacy-piece\\_final-1/](https://www.asbec.asn.au/211025-asbec-five-ways-cop26-advocacy-piece_final-1/)

<sup>3</sup> Ensuring quality control and safety in insulation installation – A research report to support an industry-led roadmap for healthy, comfortable buildings. <https://www.asbec.asn.au/wordpress/wp-content/uploads/2021/02/EEC-ASBEC-Insulation-Report-Feb-2021.pdf>

*However, installing insulation materials without addressing other elements of a building's design can also exacerbate condensation issues. (p.21)*

The Australian Building Codes Board will be addressing condensation mitigation in the 2025 and 2028 versions of the National Construction Code.

To improve the energy efficiency of existing buildings, a knowledgeable and skilled workforce is required to appropriately design, approve and construct better buildings and remediate existing buildings.

Funding is needed to develop and deliver courses targeted to emerging and existing practitioners in a range of disciplines including architecture and building design, planning, building certification, engineering, construction, and specialist trades.

**Recommendation 1.1: Invest \$50 million for targeted professional development and skills training across a range of disciplines in energy efficiency and condensation mitigation.**

*Embodied carbon*

Reductions in embodied carbon are achieved by adopting low and eventually zero-carbon building products. Using materials such as lower embodied carbon steel and cement and alternate materials that act as a “carbon-sink”, such as timber, are pathways to reducing the embodied carbon in new buildings.

An architect can reduce the materials emissions now, through the use of their skills to minimise the use of materials and to use materials that are low carbon now (e.g., using wood and natural fibres). Using the best aspect of a site can reduce emissions just as effectively as using lower emissions materials.

The Trajectory for Low Energy Buildings and its Addendum (the Trajectory)<sup>4</sup> were agreed by all Commonwealth, State and Territory energy ministers in 2019<sup>5</sup> and also referred to the Australian Building Codes Board by the Building Minister's Forum in February 2019<sup>6</sup>.

However, the Trajectory only provides a pathway for improving energy efficiency and consumption to reduce operational carbon and not embodied carbon.

The Australian Sustainable Built Environment Council's policy platform for the 26th UN Climate Change Conference of the Parties (COP26)<sup>7</sup> stated that,

*the significance of embodied carbon will grow from 16% of emissions of Australia's total building stock now, to 85% in 2050. In high performance new buildings, embodied carbon represents approximately 45% of whole-life carbon emissions. A significant share of embodied emissions in buildings, particularly the emissions required to manufacture common building products, come from the use of process heat and from chemical reactions, meaning that they will not decrease by decarbonising electricity alone. (pp18-19)*

Moreover, the Australian Building Codes Board does not plan to address embodied carbon until the 2031-34 versions of the National Construction Code.

---

<sup>4</sup> <https://www.energy.gov.au/energy-and-climate-change-ministerial-council/energy-ministers-publications/trajectory-low-energy-buildings>

<sup>5</sup> <https://www.energy.gov.au/government-priorities/buildings/trajectory-low-energy-buildings>

<sup>6</sup> Building Ministers' Forum Communique – 8 February 2019. <https://www.industry.gov.au/sites/default/files/bmf-communicue-8-february-2019.pdf>

<sup>7</sup> [https://www.asbec.asn.au/wordpress/wp-content/uploads/2021/10/211025-ASBEC-Five-Ways...-COP26-advocacy-piece\\_FINAL-1.pdf](https://www.asbec.asn.au/wordpress/wp-content/uploads/2021/10/211025-ASBEC-Five-Ways...-COP26-advocacy-piece_FINAL-1.pdf)

“Adaptive re-use” of existing buildings is a further means to minimise carbon emissions. By modernising rather than demolishing an existing building significant new carbon emissions can be saved.

Two of the main construction materials – cement and steel – require significant energy to produce, and, in the case of steel, it is currently difficult to produce using renewable energy alone.

Technological solutions to address the carbon intensity of both products are in development; however, the most effective technologies require assistance to move from concept to commercial adoption.

However, the capacity of Australian industry to pivot towards these technologies and the costs of transitioning to them are potential stumbling blocks. Without a clear understanding of the benefits of these technologies, combined with the sunk costs in current technologies and comfort with doing things the way they have always been done, are likely to increase resistance to adopting these technologies. Government assistance in their development and nurturing of their early commercialisation can fill the gap until the private sector is comfortable and the costs of adoption are lowered.

**Recommendation 1.2: \$500 million fund to:**

- **fund net zero building materials research**
- **assist University and TAFE sector to commercialise their research into net zero building materials**
- **support the investment required for local manufacture of net zero building materials.**

*Federal Government leading by design*

The Federal government can provide leadership to other levels of government and the commercial sector by retrofitting its own buildings to improve energy efficiency, eliminate the use of natural gas and adopt low-carbon materials. Government buildings should be seen as an exemplar of good design and material use.

Adaptively re-use of existing buildings, where cost-effective, should be considered over demolishing and re-building where existing suitable building assets exist.

The Government should develop adaptive reuse design guidelines for retrofitting existing buildings. The design guidelines would address:

- adaptive re-use as a sustainable and economic alternative to demolition and re-building
- energy efficiency upgrades to the building fabric and installing smart building energy management systems
- eliminating the use of gas
- maximising re-use or recycling of materials and minimising landfill waste when undertaking refurbishment and facilities fit-out projects (including at the end of the projects’ commissioned life).
- Retrofits be designed for ease of removal and future replacement to reduce future retrofit costs.

**Recommendation 1.3: Invest \$10 million to research and develop guidelines to promote adaptive re-use and retrofitting of existing government buildings to reduce carbon emissions and landfill waste.**

## **2 CRITICAL DATA FOR CLIMATE CHANGE ADAPTATION**

Australia must enhance the resilience of our built environment to extreme weather events and predicted climate change impacts. Growth in our urban and rural cities means increasing pressures on our natural environment and the crucial ecosystem services they provide (e.g., clean air, cooler urban areas).



These climate impacts have a great economic cost.

According to the Insurance Council of Australia (ICA), in 2022, there were more than 302,000 disaster related claims lodged from four declared insurance events across the country, costing \$7.28 billion in insured losses. Six billion dollars of these losses were from the northern New South Wales and south-east Queensland floods in early 2022<sup>8</sup>.

The economic costs of the 2019–20 Black Summer fires included:

- \$2.2 billion in insured.<sup>9</sup>
- the destruction of 5,900 buildings – of which 2,779 were homes from the<sup>10</sup>
- almost \$1.0 billion in business losses from the economic shutdowns following fires<sup>11</sup>

Recognising the growing economic impact of natural disasters, the Council of Australian Governments (COAG) in March 2020, tasked the Building Ministers Forum to consider ‘how to adapt the built environment to future climate and hazard conditions’, and in late 2021, the Australian Building Codes Board commenced a long-term project to review current provisions of the NCC relating to bushfires, cyclones, flooding, and heat stress. The review is to determine the fitness of the current NCCs regarding future climate projections and modelling.

How Australia builds and uses land needs to be re-appraised and informed by the best quality evidence that has considered the most recent data about our rapidly changing climate conditions and risks such as fuel loads across Australia.

Detailed maps resolved to very local geographic areas<sup>12</sup> for the whole of Australia (where permanent habitation occurs) are required. These can better inform recommended local requirements for building designs to resist local climatic threats – such as cyclones, terrestrial flooding and rain inundation, wind gusts, extreme heat and bushfire attack. These maps can also assist in developing the specifications and recommended deployment of personal and community bushfire refuges.

The Australian Climate Service (ACS) was established in 2021 by the Australian Government to provide customers with support for each phase of the natural disaster continuum (Prevention, Preparedness, Response, Recovery, Relief and Resilience). The ACS is tasked with improving the range and quality of information available to decision-makers, including:

- better access to natural hazard, exposure, and vulnerability information
- geospatial and location data
- a wide range of past, present, and future weather and climate data
- improved impact modelling and information.<sup>13</sup>

To assist in this task, the ACS is partnered with the Bureau of Meteorology, Geoscience Australia, the CSIRO, and the Australian Bureau of Statistics.

---

<sup>8</sup> Insurance Catastrophe Resilience Report 2022–23 [https://insurancecouncil.com.au/wp-content/uploads/2023/09/20897\\_ICA\\_Cat-Report\\_Print-2023\\_RGB\\_Final\\_Spreads.pdf](https://insurancecouncil.com.au/wp-content/uploads/2023/09/20897_ICA_Cat-Report_Print-2023_RGB_Final_Spreads.pdf)

<sup>9</sup> Figures from The Insurance Council of Australia investigations of 2019–20 Black Summers fires

<sup>10</sup> Figures from The Insurance Council of Australia investigations of 2019–20 Black Summers fires

<sup>11</sup> The Australian Tourism Industry Council <https://www.reuters.com/article/us-australia-bushfires-idUSKBN1ZF027>

<sup>12</sup> E.g Statistical Area SA1 See: <https://link.fsd.org.au/dataset/asgs-statistical-area-level-1>

<sup>13</sup> Australian Climate Service – Services. <https://www.acs.gov.au/pages/services>

It is critical that this information is made available publicly and freely, especially to local governments as well as designers, planners and developers working with all clients so that resilience can be built into the design and the location of our buildings.

This data may also be needed to determine if some homes should be compulsorily acquired because of the increased threats of floods, fire, and other natural disasters.

The Institute calls on the government to invest \$50 million into the ACS to develop improved national datasets and detailed maps of natural disaster and climate-related events. These datasets should be available publicly (and for free) to local governments, designers, planners, and developers. They will be crucial to ensure buildings are designed to be resilient to the future environment and are appropriately located.

**Recommendation 2.1 Invest \$50 million to fund the Australian Climate Service to develop improved national datasets and detailed maps of natural disaster and climate-related events risks across Australia.**

### 3-HOUSING AS A PRIORITY

#### *First Nations housing first*

The passing of the Housing Australia Future Fund Bill in September 2023 establishes the legislative means to deliver the \$10 billion Housing Australia Future Fund (HAFF). The HAFF is projected to deliver 20,000 new social and 10,000 new affordable homes over the next five years. However, the Institute sees this as a first step rather than the solution to the housing crisis. The allocation of \$200 million of the HAFF for the repair, maintenance, and improvements of housing in remote Indigenous communities is welcome but insufficient.

The needs of First Nations people are particularly prevalent, and while the HAFF is designed in part to address their needs, the Institute calls on the Government to provide additional financial allocations specifically to address urgent needs within Australia's First Nations communities.

The Australian Institute of Health and Welfare (AIHW)'s Housing Assistance in Australia 2021 report shows that from 2006 to 2022, total social housing dwellings for Indigenous Australians<sup>14</sup> fell from 35,085 to 32,309.

In September 2023, AIHW<sup>15</sup>, reported that in 2018–19:

- 1 in 5 (20%) indigenous households were living in dwellings that did not meet an acceptable standard.
- 46% of indigenous households in remote areas and 31% of those in non-remote areas were living in dwellings with at least 1 major structural problem.

---

<sup>14</sup> State Owned and Managed Indigenous Housing and Indigenous Community Housing. See table, Social Housing Dwelling 2023 at: <https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia/data>

<sup>15</sup> Housing circumstances of First Nations people. Release date 7 Sept 2023. See: [https://www.aihw.gov.au/reports/australias-welfare/indigenous-housing#\\_Housing\\_quality](https://www.aihw.gov.au/reports/australias-welfare/indigenous-housing#_Housing_quality)

- 9.1% of indigenous households had no access to working facilities for food preparation, 4.5% had no access to working facilities to wash clothes and bedding, and 2.8% had no access to working facilities to wash household residents.

The AIHW's data points to a decline in overcrowding over time, with the proportion of First Nations people living in overcrowded conditions falling from 31% in 2001 to 19% in 2021. In 2021, overcrowding experienced by First Nations people was 12% higher than non-Indigenous Australians.

Most importantly, a 2022 report by the Australian National Audit Office (ANAO) further noted:

*“Overcrowding and poor quality housing are associated with poor health, educational and employment outcomes, and increased family violence. In Australia, the highest levels...occur in remote areas of the Northern Territory (NT)”<sup>16</sup>*

The 2018 National Housing Survey<sup>17</sup> showed that indigenous housing programs are struggling to deliver acceptable housing. The proportion of indigenous households in indigenous social housing programs<sup>18</sup> who considered their dwelling acceptable was 70.1% compared to 83.3% who resided in non-indigenous social housing programs. The difference was even more marked for those who specifically resided in public housing, with only 67% who lived in indigenous public housing considering their dwelling to be of an acceptable standard compared to 82% of indigenous households who resided in non-indigenous public housing.

The ABS 2021 Census showed that First Nations people accounted for over one-fifth (20% or an estimated 24,930 people) of the homeless population nationally but only 3.8% of the total Australian population<sup>19</sup>. 60% (14,956 persons) of whom were living in severely crowded dwellings. The census showed that 17.2 % of Aboriginal Australians lived in crowded dwellings compared to 6.2% of the non-indigenous population.

A 2021 report on sustainable indigenous housing in regional and remote Australia, prepared by the Australian Housing and Urban Research Institute (AHURI) found that,

*“...attention to climate change is not yet a feature of indigenous housing and infrastructure agreements, with inadequate funding and attention paid to climate preparedness in new builds, refurbishments and retrofit programs.”<sup>20</sup>*

That same report noted,

*‘Quantitative analysis of the resilience of existing housing stock ...reveals the inadequacy of existing policy responses for current and anticipatable climate challenges.’<sup>21</sup>*

---

<sup>16</sup> Remote Housing in the Northern Territory – ANAO Feb 2022 (<https://www.anao.gov.au/work/performance-audit/remote-housing-the-northern-territory>)

<sup>17</sup> Australian Institute of Health and Welfare (2019) Aboriginal and Torres Strait Islander people: a focus report on housing and homelessness. Web report Last updated: 29 Mar 2019 Supplementary tables. See: <https://www.aihw.gov.au/reports/housing-assistance/indigenous-people-focus-housinghomelessness/contents/at-a-glance>

<sup>18</sup> Comprising public housing, state owned and managed indigenous housing and community housing

<sup>19</sup> ABS (2023) Estimating Homelessness: Census

<sup>20</sup> Sustainable Indigenous housing in regional and remote Australia –Final Report – Australian Housing and Urban Research Institute Limited (AHURI) Nov 2021 (<https://www.ahuri.edu.au/research/final-reports/368>)

<sup>21</sup> As above

Addressing design and quality is critical to addressing fitness for purpose and the broader context of housing outcomes in social and economic terms. Poor quality buildings and housing impact the ability to live, work and learn effectively.

Culturally appropriate housing for indigenous (Aboriginal and/or Torres Strait Islander) communities is also vitally important to create healthier, more stable, secure and socially cohesive communities. The use of a co-design process and agreed outcomes should support those communities to build and maintain their own housing, maximising the use of the local workforce in those communities who choose to do so. In this way, these remote communities are not continually reliant on external capacity and skills to develop and maintain their housing.

The involvement and leadership of First Nations people in local communities from the inception of any project is an essential success factor for these communities to achieve culturally appropriate housing outcomes.

At an estimated cost of \$500,000 per dwelling, \$4.0 billion could fund 8,000 dwellings to increase current numbers by 8,000 or 25% from 32,000 to 40,000 dwellings.

**Recommendation 3.1: Invest \$4 billion over four years to 2028 to fund a co-designed national housing deal with First Nations communities, delivering 8,000 new indigenous social housing dwellings.**

#### *Identifying federal government land and buildings suitable for housing*

While housing has been predominantly left to the states and territories over many years, the federal government has now renewed its attention on social and affordable housing. The government has several unique policy levers at its disposal that could assist in reducing the housing burden and high rents/house prices.

One of the difficulties in addressing housing is finding suitable locations for new housing and/or buildings that could be adaptively re-used (re-purposed) as housing. Land in the most desirable locations is usually expensive, if available at all. However, the federal government is a significant landlord, including within metropolitan centres and inner suburbs.

A database of Commonwealth land and buildings that may be underutilised and potentially suitable for transferring into housing/ mixed-use development is required. This database would:

1. (with the assistance of the relevant federal entity responsible for the land) identify surplus or underutilised Federal land holdings.
2. determine the suitability of the land or buildings to be turned into housing (location, amenities, land rectification costs, etc).
3. identify the optimal application of the assets for housing and potential partners to develop the land.

**Recommendation 3.2 Housing Australia to be tasked with developing a database on suitable and available Federal Government land that can be earmarked for new housing.**

#### *Doubling Housing Australia Future Fund (HAFF) – from \$10 billion to \$20 billion*

Australian governments had, prior to the 1990's, been a significant source of new housing, particularly social and affordable housing. In the 40 years between 1981 and 2021, the percentage of all Australian households living in social housing fell from 4.9 per cent in 1981 to 3.8 per cent in 2021<sup>22</sup>. In the 1970's it

---

<sup>22</sup> 2021 ABS Census

peaked at 5.6%. Meanwhile, about 6% of the total housing stock in OECD and non-OECD EU countries is social housing.

In the meantime, payments by the Federal government for rental assistance have increased to over \$ 5 billion annually, and according to welfare group Anglicare, the payment is not “fit for purpose”<sup>23</sup>. It was initially considered more efficient to subsidise rental than build new housing. While this may have been true in a normal market where there was sufficient supply, due to underinvestment in housing and increased levels of migration, what has happened is that rental housing stock has not increased with rental property demand. This creates inflationary pressures, and any increase in government assistance merely adds to this pressure by adding money but not increasing supply.

The only way to change this is to add to the supply of housing, in particular social housing, which cannot be properly met by private supply due to the fact other renters can pay more and thus are taking rental housing that once may have been made available for social housing.

This has been done before. Under the first Commonwealth–State Housing Agreement (CSHA) from 1945 to 1956, public housing stock nationwide to 96,292 dwellings from almost zero.<sup>24</sup>

The rationale for the Federal government to invest in such housing is that due to the fact it pays lower rates on money borrowed, it can borrow to build at a much lower cost than other sources such as the private sector, superannuation funds or even the States and Territories.

The government's initial investment of \$10 billion in HAFF (and other recent increases in allocated government spending on housing) is a recognition of this. However, it is insufficient to meet the real needs for social housing in Australia, even with the additional money allocated by the States and Territories.

As noted above in *Section 1 Reducing the Carbon Intensity of Australian Buildings*, the best solutions for buildings require the best designs. That requires the use of experienced and qualified building designers, in other words, registered architects, or at the minimum, designs that are signed off by a DRP.

### **Recommendation 3.3: Fund an additional investment of \$10 billion in the Housing Australia Future Fund**

#### ***Importance of Architects in Social and affordable housing***

The Institute strongly believes that social and affordable housing should not be designed to lower standards, particularly on energy efficiency, materials, and accessibility. Design is the key to unlocking housing that is both affordable and somewhere people want to live. The Institute firmly believes in well-designed housing, not “any housing”, as a key part of solving the affordable housing problem.

From a design perspective, many solutions can make apartments more liveable and attractive to a range of potential renters. Architects are skilled in making the most of any space to create a liveable yet profitable/economically viable way. Architects understand how much it costs to build, how timelines work and how to work with others to ensure that a project is completed on time and to high standards.

Reducing energy efficiency and other standards is not a way to keep social housing costs down. It only creates housing that is costly to keep warm/cool (which impacts the bottom line of both residents and the Federal Government through energy rebates and subsidies) and is likely to require extensive, costly

---

<sup>23</sup> REFORMING RENT ASSISTANCE Ending rental stress across Australia. Anglicare. Jan 2023

<sup>24</sup> Hayward, D. (1996). The reluctant landlords? A history of public housing in Victoria. *Urban Policy and Research* (14(1)): 5–35

upgrades in the future. An architect can minimise costs while making the most of materials, site aspect and other design skills to achieve compliance without additional cost.

Unfortunately, too often, the role of the architect is either ignored or downplayed. The impact of the removal of or minimisation of the roles of the architect in many big builds can be seen today by many buildings that have been delivered with defects or fail to meet standards.

In order for the HAFF and the government to get the best value for money and avoid costly rectifications (or worse, having a new housing declared uninhabitable), the Institute believes that Housing Australia should insist on the following in relation to any projects funded by the HAFF:

- Development approval by multi-disciplinary design review panels.
- Minimum 8 Star energy efficiency standard
- No gas appliances
- Design by an architect.

**Recommendation 3.4: Ensure Housing Australia funding is conditional upon:**

- **Development approval by multi-disciplinary design review panels.**
- **Minimum 8 Star energy efficiency standard**
- **No gas appliances**
- **Design by an architect.**

*Federal Design Competition for Social Housing Pattern Book designs*

One way to help keep social housing costs affordable yet set high standards is using pre-approved designs or what is often referred to as “Pattern Book” designs in architecture. These are designs that have been usually architecturally designed to meet existing standards on quality, light, airflow, energy efficiency and other requirements. Rather than having to design anew every time, these designs, properly used and orientated, can reduce the time and costs to build. Some of the advantages of these designs include:

- Faster development approval
- Flexibility
- Cost reduction through standardisation
- Meet all known standards

One of the biggest proponents of the use of pattern books for social and affordable housing is Robin Boyd, who produced numerous low-cost designs that flourished in Melbourne and other parts of Australia. These houses are now sought after due to their design excellence.

Big builders often claim that they cannot build or incorporate social or even affordable housing because of the costs of manufacturing and meeting the NCC. The Institute believes that much of this concern could be overcome using affordable pattern book designs that are approved by Housing Australia and incorporated into HAFF-funded housing.

The Institute calls on the government to fund a Design Competition for social and affordable housing pattern book designs.

This Design Competition will help not only develop a new range of designs that can quickly be adapted for use HAFF (and others) but also put the focus clearly on how design can achieve social housing goals at affordable prices.

**Recommendation 3.6: Housing Australia fund \$10 million to commission a social housing pattern book via a design competition.**

## 4-ENSURE AUSTRALIA HAS A DIVERSE AND EXPERIENCED ARCHITECT WORKFORCE IN 2030

The Institute commends the Federal Government's commitment to the implementation of recommendations from the *Jenkins Respect@Work: Sexual Harassment National Inquiry Report 2020*<sup>25</sup> and the number of statutory reforms since the 2022 Federal Election.

In late 2023, the Institute published its first *Diversity and Inclusion in the Architectural Profession Report*<sup>26</sup>, presenting findings from a national survey and focus groups. The survey was conducted in May 2023, with 1,673 respondents completing the survey, representing 12% of the Institute's membership. Respondents reported witnessing or experiencing various forms of harassment or discrimination in the workplace in the last 12 months:

- Sexual harassment: 5% personally experienced, and 7% witnessed in the past 12 months.
- Racial harassment: 4% personally experienced, and 11% witnessed in the past 12 months.
- Age harassment: 4% personally experienced, and 7% witnessed in the past 12 months.
- Differential treatment: 12% personally experienced, and 14% witnessed in the past 12 months.

In all instances, the harassment was most likely to be perpetrated by male managers and peers.

Two-thirds of respondents have not been offered diversity and inclusion training at a present or past employer.

The data demonstrates that within the architectural profession, varied forms of discrimination, harassment, and bullying take place, with little training offered to workforce participants. Further statutory and regulatory reform must take place to introduce further protections, support to reporting parties, mandatory training, and education.

### **Recommendation 4.1: Invest \$120 million in diversity, inclusion and equity training.**

#### ***Strengthening Women's Participation in construction through Paid Parental Leave***

Representation of women in the construction sector remains at a low 18.1%<sup>27</sup>, with a reported 26.1% gender pay gap in 2023.

By comparison, in the architecture profession, substantially more than 50% of graduates are female<sup>28</sup>. In 2021 the gender pay gap for full-time workers in architecture was 17.2% and is more prominent in older age groups<sup>29</sup>. Participation of women in architecture, however, has a high attrition rate with age<sup>30</sup>.

---

<sup>25</sup> [https://humanrights.gov.au/our-work/sex-discrimination/publications/respectwork-sexual-harassment-national-inquiry-report-2020?\\_ga=2.92412445.127361014.1650936125-2005753013.1648186421](https://humanrights.gov.au/our-work/sex-discrimination/publications/respectwork-sexual-harassment-national-inquiry-report-2020?_ga=2.92412445.127361014.1650936125-2005753013.1648186421)

<sup>26</sup> Australian Institute of Architects, *Diversity and Inclusion in the Architectural Profession*, September 2023, available: <https://www.architecture.com.au/advocacy-news/diversity-equity#report>

<sup>27</sup> <https://www.wgea.gov.au/sites/default/files/documents/Construction.pdf>

<sup>28</sup> According to the Annual Report on 2022 Accredited Architecture Programs in Australia. Architects Accreditation Council of Australia, 50.7% of graduates from the Masters programs in 2022 were female. See: <https://aaca.org.au/wp-content/uploads/Annual-Report-on-2022-Accredited-Architecture-Programs.pdf>

<sup>29</sup> G. Mattewson, J. Clarke & A. Hocking, *Parlour Census Report 2001-2021: Gender and Diversity in Architecture in Australia*, Melbourne, Parlour 2003. <https://parlour.org.au/research/statistics/gender-diversity-in-australian-architecture/>

<sup>30</sup> Ibid

This data is enforced by respondent data in the *Diversity and Inclusion in the Architectural Profession Report*<sup>31</sup>, which presented that:

- Women are more likely to combine part-time work and caring responsibilities
- The burden of caring (children and adults) is more likely to fall on women irrespective of working arrangements and
- Women are more likely to have accessed paid parental leave and for longer periods of leave than men in the past five years<sup>32</sup>.

Paid parental leave needs to be incentivised for fathers, with longer periods of paid parental leave offered when both parents take leave. Such policy would initiate cultural shifts that would normalise caring roles shared between men and women, introduce better opportunities for job-sharing for senior leadership roles in private businesses, and indirectly ensure the long-term participation of women in the design and construction workforce.

The Institute welcomed the government's policy reform that combines the 18 weeks plus 2 weeks will provide a total of 20 weeks for a couple (or a single parent) as part of the Paid Parental Leave scheme (PPL). This removes the assumption that parenting responsibilities fall primarily on the mother and allows a greater scope for fathers/partners to share in the early phase of child rearing and bonding.

However, we note that Australia still ranks well below the OECD average of 60 weeks<sup>33</sup> even with this reform. Another problem with the Australian system is that it does not provide any contributions to superannuation. Child rearing is the principal reason women lag behind men in relation to their Superannuation. Leading up to retirement age, the median super balance for women is around 25% lower than for men.<sup>34</sup>

The Institute supports the Association of Superannuation Funds of Australia (ASFA) in its calls to include superannuation in the PPL. ASFA notes that a woman taking a year off to raise an infant will lose, on average, \$17,600 (made up of lost contributions and earnings on those contributions). ASFA research shows that even just applying the superannuation guarantee to the PPL will reduce the superannuation loss to women by around 30%.<sup>35</sup>

The Institute also notes that the Prime Minister and Cabinet's policy document also recommends extending the Superannuation Guarantee to the PPL payments and increasing the time PPL is paid.<sup>36</sup>

\$500 million over 5 years would fix the gender pay gap, improve the representation of women in design and construction, and retain female participation in the design and construction workforce. The mechanism would involve paying superannuation on government-paid parental leave and adopting a

---

<sup>31</sup> Australian Institute of Architects, *Diversity and Inclusion in the Architectural Profession*, September 2023, available: <https://www.architecture.com.au/advocacy-news/diversity-equity#report>

<sup>32</sup> This data is aligned with data presented in *Next steps for paid parental leave in Australia*, published by the Department of the Prime Minister and Cabinet: [https://www.pmc.gov.au/resources/next-steps-paid-parental-leave-australia/australias-paid-parental-leave-scheme-national#:~:text=For%20example%2C%20Table%20%20shows,partner\)%20in%20just%2034%2C354%20cases.](https://www.pmc.gov.au/resources/next-steps-paid-parental-leave-australia/australias-paid-parental-leave-scheme-national#:~:text=For%20example%2C%20Table%20%20shows,partner)%20in%20just%2034%2C354%20cases.)

<sup>33</sup> *Next Steps for Paid Parental Leave in Australia*, 24/11/23 <https://www.pmc.gov.au/resources/next-steps-paid-parental-leave-australia/introduction#:~:text=From%201%20July%202023%2C%2020.in%20total%20will%20be%20available>

<sup>34</sup> Association of Super Funds Australia, 12 July 2023. <https://www.superannuation.asn.au/media-release/release-12-july-2023/#:~:text=Leading%20up%20to%20retirement%20age,ASFA%20Deputy%20CEO%20Glen%20McCrea.>

<sup>35</sup> ASFA Research note: Policies to reduce the super gender gap,

<sup>36</sup> *Next Steps for Paid Parental Leave in Australia*.



stepped approach to increasing the PPL from its current 20 weeks to at least 30 weeks over the next five years. An additional 2 years would be added each year to PPL out to the 2029 budget.

**Recommendation 4.2: \$500 million over 5 years to fix the gender pay gap, improve the representation of women in design and construction, and retain female participation in the design and construction workforce.**

### *Encouraging First Nations Australians to consider a career in architecture built design*

A higher socioeconomic skew and under-representation of Aboriginal and Torres Strait Islander people exists in the architectural profession. The Institute's diversity and inclusion data shows that<sup>37</sup>:

- 48% of architectural survey respondents attended state-run schools, compared with 64.5% of Australian students in 2022;
- Architectural respondents are more likely to come from families where their parents' education completed tertiary education; and
- Just 1% of Architects identify as Aboriginal and 0% as Torres Strait Islanders, compared with 3.8% of the Australian population (2021 Census).

The Institute recommends educational investment and improved opportunities for Aboriginal and Torres Strait Islander students to access and complete tertiary studies aligned with design and construction industries. This needs to be done initially via a five-year pilot program offering scholarships, grants (to universities and employers) and internship programs.

**Recommendation 4.3: Invest \$50 million over 5 years in education to encourage First Nations Australians to embark on a career in built environment design through courses in planning, architecture, landscape architecture, and interior design.**

## **5-MAKE PUBLIC BUILDINGS ACCESSIBLE FOR PEOPLE WITH DISABILITIES**

Many minimal design and construction requirements for Australian buildings are established in the National Construction Code (NCC).

The NCC also regulates a number of requirements for buildings so they are accessible or easily adaptable. These measures can enhance the quality of life for occupants of new homes and social and economic inclusion for users of all commercial and public buildings both now and in the future.

In 2010, all States and Territories in Australia, together with the Federal Government, were signatories to the National Disability Strategy 2010-20. This Strategy has seen the creation of the National Disability Insurance Scheme (NDIS).

The National Disability Strategy has six outcomes areas. Outcome 1 – Inclusive and accessible community created the *Disability (Access to Premises – Buildings) Standards 2010* as subordinate legislation to the Disability Discrimination Act 1992.

We note that the Australian Government Department of Industry, Science, Energy and Resources undertook a review of the Disability (Access to Premises – Buildings) Standards 2010 in 2021. The Institute

---

<sup>37</sup> Australian Institute of Architects, Diversity and Inclusion in the Architectural Profession, September 2023, available: <https://www.architecture.com.au/advocacy-news/diversity-equity#report>

made a detailed submission<sup>38</sup> to this review.

Therefore, as the NCC is strengthened through provisions such as livable housing design provisions<sup>39</sup>, *new buildings* will be better placed to deliver the inclusivity and accessibility outcomes that had been envisaged by the National Disability Strategy. At the same time, Specialist Disability Accommodation (SDA) funding is now paid to eligible NDIS participants through their NDIS funding plan. SDA funding is paid if a participant has extreme functional impairment and/or very high support needs and, therefore, requires specialist housing solutions for construction and/or modifications.

However, neither of these improvements addresses the issues of other existing *non-residential dwelling* buildings in the community that people with disabilities may need to access regularly for work, study, recreation, civic participation, shopping, or business. The National Disability Strategy, while identifying the need to create accessible housing, also sought to apply the principle of a Universal Design approach.,

*Taking a universal design approach to programs, services and facilities is an effective way to remove barriers that exclude people with disability. Universal design allows everyone, to the greatest extent possible, and regardless of age or disability, to use buildings, transport, products and services without the need for specialised or adapted features.* (p30, ibid)

Various government schemes subsidise the retrofitting of buildings to improve energy and water efficiency (and production/ harvesting) for Australian homes and businesses. However, there does not appear to be a similar subsidy scheme for retrofitting improvements to the accessibility of buildings, in particular, non-residential buildings and non-government buildings, consistent with a universal design approach. A nationally led subsidy scheme to retrofit buildings is needed to ensure access to all public buildings for all Australians.

**Recommendation 5.1: Commit funding of \$150 million over three years for a national accessibility upgrade program to retrofit existing public use and community buildings.**

---

<sup>38</sup> [https://www.architecture.com.au/wp-content/uploads/Australian-Institute-of-Architects-Submission-to-DISER-on-DDA-Access-to-Premises\\_May\\_2021\\_FINAL.pdf](https://www.architecture.com.au/wp-content/uploads/Australian-Institute-of-Architects-Submission-to-DISER-on-DDA-Access-to-Premises_May_2021_FINAL.pdf)

<sup>39</sup> Part H8 – Livable housing design of National Construction Code 2022 Vol 2. See: <https://ncc.abcb.gov.au/editions/ncc-2022/preview/volume-two/preface/introduction-ncc-volume-two>