

Dr Steven Miles

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Department of State Development, Infrastructure, Local  
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Via email [PGAproject@dSDLGP.qld.gov.au](mailto:PGAproject@dSDLGP.qld.gov.au)

Tuesday, 19 April 2022

Re: Priority Growth Areas legislative changes - consultation 31 March to 14 April 2022

Dear Minister Miles,

We write to you in response to the request for feedback on the document titled "**March 2022 – Legislative changes for Priority Growth Areas – Policy Intent.PDF**". We appreciate the opportunity provided to meet and discuss the document with your staff on the 6th of April. The Australian Institute of Architects (The Institute) recognises the current crisis in housing affordability in South East Queensland, and strongly supports the State's recognition of this key issue through the advancement of this legislation. The design of housing and other infrastructure is fundamental to affordability, as well as achieving sustainable and liveable communities. The Institute therefore offers recommendations regarding to the linkage between design and the proposed legislation, around four topics below:

### **1. Supporting Housing Diversity**

The Institute recognises that as part of the provision of more affordable housing, there is a critical need for more flexible and diverse housing solutions; that is, people need to be able to purchase at a range of price points in a way that suits their diverse household needs. Diverse housing forms need to be integrated with transport and social infrastructure, in a more compact settlement pattern than the current outer suburban norm. The legislation could therefore be more specific regarding the range of housing and associated good planning principles applying to developments.

The Institute therefore recommends that the legislation addresses the following key points:

- Targets for social and affordable housing and incentives for flexible and diverse housing types
- Provision for smaller, energy-efficient dwellings; cost-effective, space efficient and quality controlled housing, including at higher densities, that is designed under best practice principles
- Involvement of appropriately skilled architects, planners and urban designers in the design of diverse and liveability communities

## **2. Supporting Environmental Regeneration**

The Institute also recognises that environmental degradation and climate change are key threats to social equality and liveability in South East Queensland, and that land clearing and poor development practices are major contributors. The Institute recommends that the legislation addresses more directly the need to ensure that any new development works to restore important ecological corridors. Where appropriate, cleared land can be restored, and established environmental assets protected. It is also important that new development works to both mitigate and adapt to climate change.

The Institute therefore recommends that the legislation addresses the following key points:

- Balancing the need for new land development with the replanning of existing urban developments to address housing supply, and in particular avoiding additional clearing of land working as important carbon sinks and ecological resource. This applies to not only existing wilderness but also existing forestry land and agricultural land.
- Providing defined guidance on linkages to the State's higher level objectives around sustainable development, zero-carbon by 2050, and addressing the climate crisis

## **3. Supporting Effective Process and Resourcing**

The Institute acknowledges the urgency of addressing housing affordability in the region. The project of implementing this legislation should also ensure that the need for speed does not lead to poor planning outcomes. The Institute strongly recommends that the legislation include guidance on appropriate processes, steps and resourcing for achieving the best possible planning, design and environmental outcomes at both State and Local government levels. Appropriate environmental management, planning, urban design and architectural expertise needs to be integrated at all stages. Meaningful stakeholder engagement, especially in design processes, which can be time consuming, still needs to occur.

The Institute therefore recommends that the legislation addresses the following key points:

- Ensuring that the legislation addresses the processes and steps for good planning outcomes – particularly around environmental sustainability and high quality design
- Ensuring that the legislation addresses the need for meaningful community involvement in decision making, particularly a strong Indigenous voice in the creation of housing for Aboriginal and Torres Strait Islander communities, to ensure community ownership of the decisions that affect the lives of Aboriginal and Torres Strait Islander peoples.

## **4. Supporting Better Development Outcomes**

The Institute notes that the legislation invokes the planning tool of the Structure Plan to coordinate infrastructure and land settlement pattern. Given the importance of ensuring the best possible social, environmental, planning, urban design and architectural outcomes, the Institute strongly recommends that the legislation provides definition of 'what makes a good Structure Plan'. Embedding the characteristics of a good Structure Plan in the legislation would help the State to tie the outcomes of this legislation back to the SPP higher objectives, in addition to providing greater certainty for the development industry for achieving clear approvals pathways. We note that the Queensland Government Architect's office may be able to assist in this regard.

The Institute therefore recommends that the legislation addresses the following key points:



- Providing a clear description of the ingredients of a well-made Structure Plan
- Including targets around the provision of housing diversity, density and transport integration as a key feature of a well-made Structure Plan
- Including key environmental initiatives and targets as a key feature of a well-made Structure Plan

We look forward to continuing to work productively with the State on important design and planning matters.

Kind regards

Regards,

A handwritten signature in blue ink that reads "Mark Jones".

Dr Mark Jones FRAIA  
Queensland Chapter President  
Australian Institute of Architects

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