Level 2, 7 National Circuit
Barton ACT 2600
PO Box 3373 Manuka ACT 2603
T +612 6121 2000
F +612 6121 2001
national@raia.com.au
architecture.com.au

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Australian Institute of Architects

Ms Sara Stace
Director, National Urban Policy
Major Cities Unit
Level 21, Deutsche Bank building
126 Phillip Street,
SYDNEY NSW 2000

Dear Ms Stace

Re: Creating Places for People, an urban design Protocol for Australian cities

The Australian Institute of Architects (the Institute) welcomes the opportunity to comment on the draft Urban Design Protocol (the Protocol) and thanks you for the extension of time granted in which to make this submission.

Accompanying this letter is some detailed commentary on the draft Protocol which is offered as suggested improvements to the robustness and usefulness of the Protocol to urban design professionals, policy makers and the public.

As stated, the draft Protocol's objective is to encourage world class urban design and architecture – reflecting criterion eight of the Council of Australian Government's (COAG) capital city strategic planning reform. However the Institute thinks the overall focus of the draft Protocol is on urban design and does not adequately address the role of architecture. Our comments in the attachment therefore are focused on urban design issues.

The Institute recommends that the Major Cities Unit consider developing a separate additional document which deals specifically with architecture such as an Architecture Policy or Protocol. We believe that adoption of such a document will serve to reinforce design excellence as a national interest – in line with the objective of the draft urban design Protocol. There are a number of countries which have adopted an architecture policy such as Ireland and the Netherlands amongst others, and the Institute would welcome the opportunity to discuss with you, the merits of such an approach and assist in the development of such a document.

The Institute would also be happy to discuss its following comments in more detail if required.

Yours sincerely

David Parken, LFRAIA
Chief Executive Officer

The Royal Australian Institute of Architects
trading as Australian Institute of Architects
ABN 72 000 023 012

Australian Institute of Architects' comments on the draft Urban Design Protocol

General observations

- While we are supportive of an Urban Design Protocol we think its usefulness will be enhanced by more detail and we note that accompanying documents are slated to underpin the Protocol, such as peer-reviewed guidance on best practice, a toolkit on urban design concepts and a range of case study examples. The information in these further documents is expected to be of more substantive use to professionals working in urban design.

- One of the objectives of the Protocol and its accompanying material, is the encouragement of good design and improvement of the public realm. In relation to higher density areas, achieving, suitable, useable, high quality open spaces in the public realm can play a vital role in changing people's attitude to increased urban density.

- The Institute makes the observation that overall, the Protocol seems to be reluctant to discuss the qualitative aspects of urban design versus the quantitative aspects. For instance, the discussion of urban design throughout the document appears to be mainly fixed on managing issues such as; safety, comfort, travel options etc, at the expense of also discussing the role urban design plays in creative transformation of places for people.

- We suggest more emphasis is needed on the important outcomes which urban design can influence and enhance. These include the notions of inclusive, resilient, adaptable and productive cities, the importance of cultural identity, the role of innovation and the identification of Australian character. We recommend that these notions be encouraged within the draft Protocol.

- The Institute also recommends that the following issues/factors which influence urban design should be considered for more detailed discussion within the Protocol;

    - the integrative process of urban design, whereby competing interests and a variety of disciplines need to be accommodated/addressed,
    - the procurement model used as this determines the control of design, staging of delivery services etc
    - the primary elements of urban form being; movement systems (eg, transport of all kinds), open space and built form.
    - the diversity of scales requiring urban design, the document focuses heavily on the small scale, but urban design is also critically important for major infrastructure such as railways and ports. Generally the Protocol seems biased towards considering urban design in the context of human scale outcomes – while important, it is too limiting when considering the many issues around urban design involving large scale urban infrastructure within post industrial, contemporary cities,
    - the importance of universal design, adaptability and accessibility in the context of our ageing population warrants a more detailed focus,
    - more focus is required on urban places as a destination – a place people want to go to, to experience. Places thrive through the

presence of people being there, as opposed to people using the floor of the city as merely a corridor to their destination rather than as a connection with place. Public spaces need to involve people in an ongoing basis that draws them in and continues to engage them. High usage of a place is also often associated with a sense of safety in an area,

- the importance of the linkage between urban design and infrastructure cannot be understated. We note the mention of the linkage between urban design and infrastructure in the beginning of the draft Protocol but we recommend the linkage be reinforced throughout the document. To address our society's challenges eg, climate change, population growth and changing demographics etc, the key to truly sustainable human development is through sustainable cities and the key to sustainable cities is infrastructure,
- some further discourse may also be useful on community engagement and the collaborative nature of urban design and participation by the community.

Governance issues

- It is not clear whether any metrics will be developed to enable the assessment and benchmarking of achievement in good urban design, and what criteria might be set? Any metrics need to recognise that quality occurs across a whole range of areas and scales. The Institute believes the development of such metrics would support a culture of seeking continuous improvement. The Institute is currently working with the Australian Sustainable Built Environment Council on a set of indicators for sustainable cities.

- The Institute recommends that discussion relating to the leadership and governance principle be expanded to include issues such as: peer review, meritorious architecture selection process, the relevant role of Government Architects and the nature of architectural and urban design competitions.

- Design excellence can be assessed on a peer review basis and there are models around the country of design review panels. The Institute recommends that the Protocol advocate for design review panels to be established to oversee the design process in relation to urban planning.

- The Institute recommends that accompanying the development of the Protocol, it will be important to consider associated factors which will engender or impede the success of the Protocol's objectives, for instance; funding for research and higher levels of education in addressing urban design issues and theory, communication and awareness of urban design and the Protocol and the application of the Protocol across government(s).

Evolution of urban areas

- The draft Protocol could be perceived as having an underlying assumption that cities are fixed and unchanging. Cities are continually evolving and there is a need for adaptability and resilience to balance current and future needs of the city's residents. Urban design isn't a single, specific exercise, and to

reflect this, the Protocol needs to advocate a more flexible approach to urban design to accommodate the contextual and cultural growth and evolution of our cities – to allow for the reinvention of city areas.

- In line with the above point, the Protocol could also acknowledge that there is increasing expectation that cities generate more than they have in the past, ie, there is a need for food security, knowledge generation, employment, energy and water production etc.

Suggested changes to definitions

Page	Subject	Comment
4	Definition of Urban design	It is suggested that a stronger statement is needed, outlining the philosophy/quality of place making. The Protocol could be more unequivocal in its expression of the fundamental role of urban design, eg, urban design is essential in creating liveable spaces.
5	Definition of architecture	Suggest changes to the last sentence **(in bold)** "Poor architecture can detract from good urban design **and cause social disconnect and exclusion**, conversely, good architecture can make a positive contribution to broader urban design outcomes **and social inclusion & harmony.**
6	Definitions	This section could be expanded to include additional urban design related definitions, eg, to better capture objectives of creating a sense of place, or importance of responding to the unique characteristics of locale etc. Definitions of place making and its alternate 'place-lessness' could also be considered for inclusion.
6	Urban grain	This term needs to describe more than subdivision. Urban design is also about the balance of space to built form and its disposition within a human settlement that will be created by the subdivision pattern. Urban grain is about many hands involved in the making of a city based on subdivision.
	Density + mix	This definition omits discussion about its impact on the street network and hierarchy and block size in terms of establishing the urban grain. This definition should precede 'urban grain' on the hierarchy, as the grain is developed in response to the intent of the

		density and mix – and should form part of the development of the vision or desired future character for the area.
7	Height + massing	We recommend including discussion about the sense of enclosure that height and massing create. The response of these two elements to the open space is important, as well as how these elements affect the amenity of the street, spaces and other buildings. Massing is also a lot more than just height and floor area – it includes consideration of site coverage, building footprint, disposition of massing on a site in relation to other considerations and how that impacts on public and private amenity.
	Streetscape + landscape	It is suggested that this definition include mention of design responding directly to hierarchy and modes of movement - and other links beyond streets – pathways, cycle ways, mid-block links, open space connectivity and habitat corridors, all of which seem to be missing. Perhaps more needs to be added about the creation of spatial nodes to encourage interaction within the community.
	Façade + interface	These terms downplay the importance of the relationship of the building to its site and its neighbours. A better alternative may be 'site design' or 'configuration' – and 'design quality'.
	Details and materials	We suggest that this and the previous definition need to also talk about the establishment of the response to the human scale and human comfort through building design, proportions and solid to void ratios as well as their contribution to safety and enjoyment of the public domain.
	Public realm	This definition could be refined and needs to reflect the fact that the public domain may also include natural environments that are preserved as part of an urban design approach.
	Social + economic fabric	This definition could be expanded to include mention of demographics and life stages, perhaps also interaction and support networks.
8	Design principles for	This could include mention of providing

	people	opportunities for people to meet and develop shared values.
		The descriptions used such as 'comfort, safety and walkable places' could also be expanded to include; cultural experience, spiritual engagement, education and learning and the role of public art etc.
		We suggest the term 'comfortable' places be replaced with the term 'stimulating' places, as comfortable places are not always the most interesting.
	Design principles about place	The terms used for this principle could be expanded to include the identification and development of design strategies to create a sense of place for neighbourhoods that create a sense of identity for residents and encourage their interaction with and enjoyment of the place.
9	Diagram of goals	The diagram demonstrating the five goals of the Protocol is linear and suggests a hierarchal nature to the goals. Instead we think the goal of design encompasses and contributes to the other goals and a diagram better representing this warrants consideration. Design should be viewed as a process rather than a desired artefact at the end of the process as the diagram currently suggests.
	Protocol's third goal	Suggest add to goal **(as in bold)** 'To cultivate healthy, cohesive **and inclusive** communities"
	Principles for economic prosperity	It would be good to include a principle regarding sufficient concentration of a catchment or users to support business and infrastructure.
	Principles to foster environmental responsibility	These principles could also include discussion around mitigating or reducing the use of resources and minimizing the environmental impacts of the built environment.
10	Goal to create healthy and cohesive communities	In relation to the dot point 'engagement' suggest adding **(in bold)** '(acknowledges that urban design is about creating places for people **of all abilities**)'
11	Principle of Excellence	Suggest adding 'universal design' to the related concepts column
		Suggest adding 'accessibility' to the related concepts column
12	Design principles for people	Under the principle of comfort, we suggest deleting the word 'egalitarianism', as we

		think the objective of the principle is better served by the term ' inclusivesness'.
		Under the principle of pedestrian scale, we would argue that this principle is not about mobility or ease of getting around – it is about creating an environment that responds to the scale of humans. It sets up relationships for building and the public domain that create amenity and a sense of comfort for human beings. This is about the detail of buildings at street level, the scale of development in relation to the width of the street and open space, ensuring development is not too dominant to the open space, creating visual interest for the eyeline and the view available to pedestrians, etc.
13	Design principles for place	'Connected' could also include providing a range of route options for moving through an area.
		'Diverse' could also reflect a range of residents – age, demographics, culture, etc and varying experiences and opportunities for everyone within that place.
		As mentioned earlier in our submission, 'enduring' could also include long-term flexibility to reflect the evolution of cities and places, the reuse of materials and the acknowledgment and response to cultural and built heritage.