19 August 2011

Major Cities Unit
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

Dear Sir/Madam,

**Australian Urban Design Protocol – MGS Architects submission**

McGauran Giannini Soon Architects Pty Ltd (MGS) thanks the Major Cities Unit for the opportunity to provide a submission on the draft framework for the Australian Urban Design Protocol (AUDP).

MGS is a well known practice with extensive experience in urban design and architecture. Directors of the company have held strategic oversight roles on renewal projects for significant public places and major projects, such as the Hobart Sullivan’s Cove Waterfront and the Commonwealth Games. MGS are also research partners for ARC funded linkage projects developing design tools and research knowledge for better cities. The company has had a long-term association with affordable and community housing provision, including board roles in developing and implementing over $500m of accessible affordable housing in proximity to jobs and services. This continued research interest and advocacy leadership led to an invitation from the Prime Minister for involvement with the Inclusive Cities stream of the Australia Davos Connection Future Cities Summit in 2010. MGS’s work has been published and exhibited worldwide.

We have reviewed the AUDP Draft Framework for Comment in the context of the *Our Cities, Our Future* national urban policy and the associated background research papers prepared by the Major Cities Unit. We applaud the efforts of the federal government in providing policy coordination, support and guidance for urban issues as a means for enabling a better decision making framework for infrastructural funding and alignment of priorities between all levels of government. Cities are not only home to the majority of Australia’s population but are the major generators of economic growth, providing a key context for innovation, knowledge production and improved productivity. Simply put, better places support healthier, better connected and more resilient communities. This
is an area where the federal government can make a significant difference through policy leadership and well targeted funding investment.

MGS is in favour of the Australian Urban Design Protocol. We feel that it will be an important tool for supporting best practice urban design outcomes in Australian metropolitan areas. An Australian protocol will align us with a host of other comparable jurisdictions worldwide that recognise and support design quality within national policy.

As a document, the AUDP should meet or exceed the standard set by other comparable best practice publications currently available, such as the UK Urban Design Compendium (Homes and Communities Agency, Government of the United Kingdom) and the New Zealand Urban Design Protocol (Ministry for the Environment, New Zealand Government). Broadly, the principles outlined within the AUDP are consistent with these documents and will support good design and good placemaking. However, while we recognise that the document currently under consultation is a framework and not the protocol itself, we assess that it does not yet meet its potential as a policy tool.

Critically, there appears to be an implication that cities are largely fixed and unchanging, which suggests that urban design and planning is an exercise in managing issues within a business-as-usual approach. In the protocol’s present draft, it is hard to identify the enabling tools necessary for the establishment of a both a shared vision for better places and the necessary incentivising for creative transformation of our cities. The need for change is clear, as was clearly set out in the 2010 Our Cities background and research paper (aptly subtitled The Challenge of Change). We suggest that a few of the concepts introduced in this background document need to be more strongly addressed through the protocol.

We nominate inclusive cities as a key design principle. Inclusive cities require designs and places to actively engage all members of the community, not just a small proportion. There is a potential tension here with the principle that places should be comfortable. This risks that while some portions of the community may be comfortable others will be excluded from this benefit. An inclusionary approach promotes a wider idea of community and requires ambition and investment for a greater good. There is a real and pressing need to create stronger communities while countering the emergence of parochial NIMBY localism. Encouraging comfort as a design principle only partially addresses this issue.

An associated design principle is the need for resilient places. The idea of resilience suggests firstly that places should be designed to withstand natural disasters, which is an important consideration but an extreme context. Resilient places in a more everyday sense are adaptable and able to accommodate change, facilitate convenience and proximity and are less dependent on private transport for their access and sustainability. Urban areas are in constant flux and in response the planning framework must balance current and future needs. Resilient designs for place are able to be adapted to fit future requirements both known and unknown, potentially providing a loose fit for current needs but allowing a longer useful lifespan. Resilient places require diversity, ensuring that a wide variety of human and physical resources are accessible. For instance, diversifying housing choice in more affluent mixed-use areas, which provides housing options for families and allows a wider range of people to live and work in areas with high amenity. In less affluent areas, increasing the land use diversity, access to high quality employment, education and public transport and spread of income levels and
demographic profile is an approach to improving community vitality. In both contexts developing place-specific models for mixed use development is vital.

We recognise that themes such as social inclusion, resilience and diversity are embedded within the thinking in the protocol as essential elements of a productive, sustainable and ambitious urban future. We are arguing here that they should be brought forward in importance and articulated clearly as imperatives for world class urban design and architecture. Design by definition has a transformative effect on places and there is a need to support innovation and continuous improvement in our metropolitan regions through design processes and knowledge. One important mechanism to do so is to embed peer review processes, such as design competitions and review panels, and measurement against access, economic benefit and urban renewal or establishment principles into government procurement and funding. This will help ensure design standards remain at a world class level.

To ensure its long-term value, the AUDP will need to be integrated with existing (and future) policy and governance arrangements. It would be a great shame if this protocol suffered from a lack of stakeholder understanding and ‘buy in’. The AUDP will demonstrably need to inform decision making if the positive effects of its goals and principles are to be felt across the nation.

There are a number of ways in which the effectiveness of the AUDP can be ensured:

- **AUDP goals and principles** must be woven into federal government infrastructure funding criteria for projects affecting the built and natural environment. AUDP influenced funding criteria should apply to ongoing funding streams and also one-off projects such as community grants. As well as applying to the assessment of State and local government funding requests, AUDP influenced criteria should also be applied to not-for-profit and private sector funding streams.

- **Integrate AUDP goals and policy in other policy documents**, such as those created by:
  - Department of Infrastructure and Transport
  - Department of Innovation, Industry, Science and Research
  - Department of Education, Employment and Workplace Relations
  - Department of Sustainability, Environment, Water, Population and Communities
  - Department of Families, Housing, Community Services and Indigenous Affairs
  - Department of Climate Change and Energy Efficiency
  - Department of Families, Housing, Community Services and Indigenous Affairs
  - Department of Regional Australia, Regional Development and Local Government
  - Department of the Prime Minister and Cabinet
  - Infrastructure Australia
  - Comparable State Government departments
  - Australian Research Council
  - Australia Council for the Arts.

- **Reaffirm COAG’s commitment to the protocol** and help facilitate by consensus the adoption of AUDP goals and principles at a State departmental level.
Australia’s metropolitan regions require and deserve the strategic attention that this policy will provide. Our cities need the highest level of coordination to ensure that the investments made now by both government and the private sector lead to better places for all. In developing the Australian Urban Design Protocol the federal government has a responsibility to ensure that the protocol’s goals and principles are fulfilled to the fullest extent possible. The seventy-five percent of Australia’s population that lives in urbanised areas deserve no less.

Yours sincerely,

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