



13 September 2019  
Design Brisbane  
Brisbane City Council  
GPO Box 1434  
Brisbane Qld 4001

*Email submission: [DesignStrategy@brisbane.qld.gov.au](mailto:DesignStrategy@brisbane.qld.gov.au)*

Dear Design Team,

**Re: Submission for the draft New World City design guide - Subtropical homes for a Brisbane lifestyle**

Thank you for the opportunity to meet with Brisbane City Council employees regarding the above document. The Queensland Chapter of the Australian Institute of Landscape Architects (AILA) welcomes the opportunity to respond and applauds Council for providing the opportunity for guidance on design-led outcomes.

**AILA** is the growing national advocacy body representing over 3,000 active and engaged landscape architects, promoting the importance of the profession today and for the future. Committed to designing and creating a better Australia, landscape architects have the skills and expertise to solve macro issues with innovative integrated solutions. Landscape architects contribute leadership, creativity and innovation as they strive to collaborate to achieve better health, environmental, social and economic outcomes. From citywide strategies to the redesign of local parks, landscape architects are making places and spaces more sustainable and productive.

AILA's national position statements on [Green Infrastructure](#), [Child Friendly Cities](#), [Future Street](#), [Healthy Communities](#) and [Active Travel](#) all examine how an integrated approach can be used to shape the health and wellbeing of a community. Landscape architecture plays an important role in developing these strategies.

Please find attached the AILA response to the consultation document for 'Brisbane and draft New World City design guide - Subtropical homes for a Brisbane lifestyle.'

We would welcome the opportunity to discuss further, and request that we remain involved in the ongoing development of the document.

Should you have any queries or wish to discuss, please contact Melanie West, AILA Queensland Chapter Manager on 0417 666 622 or [melanie.west@aila.org.au](mailto:melanie.west@aila.org.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Uhlmann'.

**David Uhlmann**  
AILA Queensland President



## Response on the draft New World City design guide - Subtropical homes for a Brisbane lifestyle

AILA broadly supports the goals of the document, in particular the focus on ensuring good quality design outcomes are achieved. However, we have concerns regarding the implementation of the document, and ensuring that it has adequate weight in the Planning Scheme.

In line with our comments on the Design Led City consultation document, we recommend design guidelines are given more weight in City Plan, and through strengthened pre-lodgement, Design-Smart or Advice-Smart processes – particularly for projects that would be impact assessable.

Further, we recommend the weight of these assessment processes be strengthened to provide greater flexibility to override the planning scheme when exemplary design outcomes are proposed.

In addition, we would recommend that Council Design and Planning leaders be suitably empowered to provide recommendations to development proponents, and that measures be put in place to ensure that consistent advice is received from different Council officers.

Combined, these measures would enable good design outcomes to be factored into the earliest stages of project feasibility and cost analysis, and minimize the risk of their removal through the design development and construction phases.

Further, it is noted the design process is ongoing throughout all phases of project including construction. There should ideally be an item that addresses design alterations post approval and during construction to ensure that good design outcomes are not changed for financial or time reasons as a project progresses.

Other General Comments are as below.

1. The language on when to use the guide needs to be strengthened and clarified. For example, instead of headings like “Why use this guide” it should be “When to use this guide”
2. The position and relative weight among other design codes and guidelines needs to be clarified, and given greater weight in policy
3. AILA supports the requirement for more contextual analysis to be included in submissions, but some of the mapping examples provided should be updated to better reflect how this impacts on subject sites (i.e. aspects that development proponents have control over), and how they would be applied to projects of different scales (e.g. from a lot-split to a larger scale townhouse project)
4. The contextual analysis examples need to provide better recognition that surrounding context is both “existing” and “planned” – that is, a design response to existing context will be different to a design response to “planned” context.
5. The checklist approach at the end of the document deviates from the principles of performance-based planning and needs clarification on what level of compliance with these checklists will be considered “good design outcomes” by Council. For example – will Council be requiring that all boxes must be checked in each category? Using a checklist approach also restricts opportunity of innovation and alternative approaches that may not be currently be included in the checklists.
6. The document is generally responding to form of buildings and site planning issues. In line with our comments on the *Design Led City* consultation document, there should be much stronger language around incorporation of sustainability measures. For example – in line with AILA’s recent declaration of a “*Climate and Biodiversity Loss Emergency*”, discussions around roof lines and architectural forms and Character should arguably be overridden by sustainability initiatives which may require flat roof forms such as intensive green roof systems for biodiversity enhancement and maximization of solar panel area



for optimized sun access. Likewise, for social sustainability, there may be a case for lower quality finishes and/or inclusions in certain circumstances to meet housing affordability imperatives.

7. We note that one of the design considerations refers to “existing vegetation” but has no reference to its quality and/or benefit.
8. A reference to “significant” vegetation – either ecological or amenity would be ideal. In particular, language that defines the difference between vegetation with existing significance; or designing for future significance. Isolating land area for vegetative links is a clear demonstration in thinking about the future.

Thank you for the opportunity to respond to the Consultation Document, and we would welcome the opportunity to remain involved in its ongoing development and implementation.