Australian Institute of Architects

GBCA NATURE POSITIVE ROADMAP

Submission by the Australian Institute of Architects

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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 around 14,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) to provide input on the Green Building Council of Australia's draft Nature Positive Roadmap
- At the time of this submission the National President is Adam Haddow
- The Chief Executive Officer is Cameron Bruhn

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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.

Executive Summary

The Draft Nature Positive Roadmap articulates a vision for a built environment that halts biodiversity loss by 2030 in line with the Federal Governments 'Strategy for Nature 2024-2030' and supports full ecological recovery by 2050.

It proposes five guiding principles

1. Prevent nature loss
2. Increase and connect nature
3. Drive circularity
4. Choose low-impact materials, and,
5. Invest in nature

It is underpinned by specific metrics, and structured to align with frameworks such as the Kunming-Montreal Global Biodiversity Framework, Taskforce on Nature-related Financial Disclosures (TNFD), and Australia's Strategy for Nature 2024–2030.

It recognises that the built environment — responsible for land clearing, pollution, and embodied carbon — is both a driver of and solution to biodiversity loss. The roadmap foregrounds First Nations knowledge, systemic reform of failing regulations (like the EPBC Act), and mechanisms for integrating climate, circular economy, and nature regeneration goals.

100% of members agreed that:

The biodiversity and climate nexus is accurately framed.

The roadmap accurately frames biodiversity loss and climate change as "twin crises," that emphasise ecosystem-based solutions as critical to both mitigation and resilience. The roadmap's focus on carbon sinks (e.g., soils, mangroves) is strongly leading industry frameworks.

The circular economy and material supply chains were tackled directly supporting regenerative pathways to design in the built environment

The roadmap supports regenerative and circular principles through its "Drive Circularity" target — a clear synergy with ASBEC's Our Upfront Opportunity and Green Star's Responsible Material pathways. It also quantitatively supported by recent GBCA's "Our Homes Weigh a Tonne" research for housing calling for upfront carbon to be included in verification of buildings.

There is regulatory incoherence across Australia of 'habitat fragmentation and ecosystem degradation'

Including overhauling planning frameworks to deliver consistent ecological outcomes and GBCA's call for cumulative impact assessments and federal-state integration echoes long-standing sector concerns.

Precinct-Scale Planning and Country-Centred Design

The roadmap's emphasis on precinct- and catchment-scale impacts reflects best practice in systems-based design (as also articulated in the Institute's Decarbonisation Plan and aligns with Government Architect framework such as Designing with Country (NSW).

The report grounds health, equity, and resilience in science

The roadmap effectively embeds this into its targets for equitable green space, culturally appropriate design, and liveable, biodiverse urban settings.

Nature Positive Roadmap questions:

The roadmap recognises the importance of nature across all aspects of the built environment, however, during its development, key challenges and opportunities in relation to new developments were highlighted. GBCA is focusing the roadmap on new development, with the intention of releasing an addendum to the roadmap later. Do you agree with prioritising new developments?

50% of surveyed members agreed to the prioritisation however noting that positions were foremostly for reuse and densification of inner-city suburban areas instead of urban sprawl.

For existing buildings, what are some key challenges that should be considered?

A key challenge for existing buildings is that planning and building codes often discourage adaptive reuse, making demolition the business as usual. Reform is needed to incentivise reuse and embed penalties for unnecessary demolition. Unfortunately, despite the will of the design professions to undertake innovative design by instilling criteria in their competencies.[1]

> *"every project sits on Aboriginal or Torres Strait Islander land, and adaptive reuse offers a practical pathway to honour stories of place while cutting embodied carbon."*
>
> Sarah Lynn Rees[i] an Palawa woman and Architect

Equally important is the need for proper audits of existing buildings within their cultural and ecological context to identify what can be repurposed or adapted. A reuse-first approach lowers carbon footprints and strengthens cultural continuity, positioning adaptive reuse as both a climate response and a step toward reconciliation in the built environment.

Are there any important stakeholders that should be considered and included within the roadmap that are not listed on page 14 and 15?

Members noted that the key to good nature positive design is to ensure key stakeholders talk to each other early and build vision together. They also offer the following advice that there needs to be a larger integration of Universities or Academic Researchers considered as the focus on growing skills and capacity increases leading into 2030. Integration into built environment courses, and having cross discipline course content where Architects, Engineers, Planners, Landscape Architects all work together in nature positive learning modules will be critical. While systems thinking is growing in education of these disciplines, putting it into practice in a facilitated setting would be akin to undertaking a mini-apprenticeship in regenerative design.

Conservation groups were suggested as another stakeholders as often act as the stewards and key knowledge holders for specific areas.

[1] The National Standard Competencies for Architects (NSCA) to meet core First Nations competencies recognising care for Country and the ethical responsibility to reduce extractive practices.

The roadmap recognises the essential role of First Nations knowledge, leadership and custodianship in achieving long-term outcomes for nature. What opportunities do you see for further recognising and embedding this within nature-positive approaches in the built environment?

While growing awareness is providing better opportunity for quality outcomes across different cultures and stakeholders, using projects such as the Yitpi Yartapuultiku by Ashley Halliday Architects that speak to a newer design-process which embeds understanding co-delivery and design time differently, hold points and debriefing with stakeholders to ensure the design integrity and cultural representation are upheld. Members see transparency about evolving co-design processes critical to meeting targets.

Too often, planning and building approvals follow a straight, milestone-driven path that sidelines the co-design workshops critical to community ownership and project success. Ashley Halliday Architects' Yitpi Yartapuultiku project shows the power of doing things differently: First Nations voices were embedded throughout the process, shaping design decisions well beyond traditional stages. This kind of systems-thinking approach—fluid, collaborative, and responsive—requires regulatory settings that support flexibility in approvals and consultant roles, so long as the project's guiding principles and outcomes remain intact.

> *"The design represents a thoughtfully considered site-wide exploration of landscape, site planning, ecology and architecture and expresses the ideas, values and requirements identified with the custodians through a series of design workshops. The place-based, co-design process was the foundation upon which we contributed our skill and experience as design facilitators in the spirit of two-ness and reciprocity"*
>
> Ashley Halliday Architects (2025)[ii]

Addressing the interconnections between climate change, the circular economy, and our relationship with nature is central to achieving nature positive outcomes. Are there other opportunities for alignment that should be considered?

Positive outcomes for nature and climate must go hand in hand with social equity and regulatory reform. Access to the health and wellbeing benefits of nature should be universal, not restricted by economic means. At the same time, stronger alignment with government agencies that set building and industry standards is critical, as current regulations often create barriers to ecosystem care. Addressing these social and regulatory dimensions is essential to achieving genuinely nature-positive outcomes.

Pages 20 - 21 outline key challenges in the current regulatory framework, and shortfalls in protecting nature. Are here any additional challenges the roadmap should consider?

Key challenges include misalignment between Planning and Building codes and nature-positive objectives, and the lack of incentives for adaptive reuse of existing buildings. Streamlining approvals for small-scale biodiversity improvements and strengthening compliance monitoring are practical "easy wins" that can deliver measurable environmental benefits quickly.

Small scale-built environment intervention should have the same level of Nature Positive consideration as a larger building. Though design processes may differ in length and breadth, both should be guided by firm policy.

Are there additional implications related to land availability and population growth the roadmap should consider?

Members support the final roadmap considering the impacts of transport planning on ecosystems and public health, and the prioritisation for redevelopment of existing urban areas over new land development.

Does your organisation have a commitment to addressing circularity in its projects?

100% of members surveyed have circularity commitments embedded into their operational and business process to measure impact across projects.

Simple measures were noted such as prioritising 'reuse of existing buildings' and 'aiming to reuse materials where possible. We prioritise materials/products that are sustainably sourced and natural and/or with recycled content (small architecture practice).'

Are you measuring the rate of circularity in your projects? If so, what methodology are you using?

Business processes such as 'project feedback sheets' were used within practice methodologies, however there were also focuses on the larger measurement and justification across a wide range of areas (sustainability, carbon, reconciliation, quality assurance) that was outlined as having an good project outcome, however there were differences in implementation due to the scale of practices and their ability to mobilise nature positive outcomes more meaningfully with fewer resources.

Common materials such as concrete, steel, timber, asphalt, and plasterboard have been identified as having a high impact on nature. Are there any other high-impact materials that should be considered in the Roadmap?

Other materials identified included:

- Plastics (eg, polyester) which is in a huge amount of building materials
- Paint
- Cladding
- Insulation
- Fitout materials including carpets, vinyl, furniture, lighting and wiring, fabrics, pinboards, sealants, packaging.
- Adhesives
- Refrigerants

Do you currently address water-related impacts in your projects? If yes, how are you addressing them?

Members were actively encouraging the integration of water capture and use, as well as Water Sensitive Urban Design (WSUD), in our projects. This is achieved through strong design principles, incorporating effective collection and smart reuse strategies, and collaborating with clients to raise awareness of the importance of sustainable water management.

Do you currently have a policy towards nature positive investments?

50% of surveyed members had a policy towards nature positive investments.

What challenges and opportunities do you consider in nature-related investments?

All new development in natural areas inherently creates a negative environmental footprint, making mandatory biodiversity offsets essential to prevent net loss and support ecosystem protection.

Do you agree with the interpretation of key challenges the roadmap should address?

While agreement was made, members identified that the impact of climate change itself should be accounted for. Members were particularly concerned about the mangroves for storm protection, rising sea levels and erosion protection in addition to other critical ecosystems that need protection. They acknowledge the sequestration of carbon as an ongoing challenge, particularly relating to long term climate resilient forestation and where urban greening doesn't always equate to protecting species from future heat stress which will mean some species will not thrive.

Do you have any feedback on the foundations for success outlined in the roadmap? Are there other enablers critical to achieving nature positive outcomes that should be considered?

Additional reporting and measurement need to be carefully considered to ensure that it is effective and balances the burden across different scales of businesses and projects.

Following the discussion paper, the principles have been updated to include circular economy. Do you support this change?

100% of members surveyed supported this change.

Embedding culture, community and connection to Country is now considered an enabler that underpins all principles. Do you support this framing?

100% of members surveyed supported this framing.

Do you support the timelines proposed for the targets? If not, why not?

100% of members surveyed supported this timeline however noting that it should be starting today.

This principle sets targets that prioritise protection of high, then moderate biodiversity values, following the Environment Institute of Australia and New Zealand's guidelines. Do you support this approach to framing nature protection targets? If not, are there other definitions you would recommend?

100% of members surveyed supported this approach however areas currently of 'low biodiversity value' should be identified and regenerated as a priority also, creating more value in those areas.

Do you agree with the proposed targets for prevent nature loss?

Members understood the desire for achievable targets, they stressed however that no biodiversity loss should be immediately attainable as biodiversity offset programs (incentives/opportunities) are already in place.

Do you agree with the targets proposed for Increase and connect nature?

Members understood reasonable targeting however felt that the targets from 2027 for 'measurement' should be firmer. They supported this drive with their professional competencies

and training which teach that the built environment has a huge impact on nature and biodiversity loss, and stressed there are readily available solutions.

They further identified that preference for measurement and reporting strategies to be developed concurrently with strong immediate action.

The GBCA has adopted the Nature Positive Initiative's definition of nature positive. Do you agree with this? If not, why not?

100% of respondents to this question agreed to the adoption of the Nature Positive Initiatives definitions of nature positive.

Do you have any feedback on how the roadmap can support TNFD reporting, or suggestions for additional guidance it should provide?

Members surveyed identified that they would like to have reporting more readily accessible, embedded into everyday approval and regulation pathways and be achievable at different scales, especially for small business.

Conclusion

The Draft Nature Positive Roadmap offers a credible, science-informed, and policy-aligned blueprint for shifting the Australian built environment from biodiversity liability to regenerative asset. Its structure is complementary to both international frameworks (TNFD, GBF) and domestic policy tools (EPBC reform, Infrastructure Australia reports, Green Star evolution).

It emphasises First Nations leadership, cultural continuity, and early engagement, drawing on the *Designing with Country* framework in collaboration with Culture to Country. It focuses on locally relevant bioregions, community co-design, and regenerative infrastructure tailored to place. Biodiversity and water-sensitive design are prioritised at the catchment scale, aligned with ecosystem services. Strong emphasis is placed on embodied carbon reduction, carbon sinks, renewable materials, and avoiding primary forest loss. The roadmap promotes minimal land use, low-impact construction, and adaptive reuse of infrastructure. Using natural capital accounting, it values ecosystem services at $85B annually to inform policy shifts. It embeds equitable access to nature, inclusive green infrastructure, and support for CALD communities, alongside locally led design and biophilic principles that foster health and productivity. Aligned with 2030 and 2050 Kunming-Montreal GBF targets, it integrates circular economy principles, transparency, partnerships, and education while addressing scope 3 emissions and biodiversity impacts.

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[i] Lynn-Rees, Sarah (2020) Reconciliation Through Architecture: A Chance To Build On The Past – Monash Lens

[ii] Ashely Halliday Architects (2025) YITPI YARTAPUULTIKU - Ashley Halliday Architects