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Dear Peter

Australia ICOMOS SUBMISSION

The Draft Design Guide for Heritage: Implementing the Better Placed policy for heritage buildings, sites and precincts.

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, has over 650 members in a range of heritage professions and is amongst the largest of the over 100 national committees of ICOMOS.

Australia ICOMOS is grateful for the opportunity to provide the following comments on *The Draft Design Guide for Heritage: Implementing the Better Placed policy for heritage buildings, sites and precincts* (working draft 2018). Australia ICOMOS understands that *Better Placed* is an integrated design policy for the built environment of NSW. “It seeks to capture our collective aspiration and expectations for the places where we work, love and play. It creates a clear approach to ensure we get the good design that will deliver the architecture, public places and environments we want to inhabit now and those we make for the future”. (GA NSW website)

The addition of a specific Design Guide for Heritage as part of the NSW Government Architect’s Better Placed design policy is seen as a welcome initiative however the precise role of Design Guide needs to be clarified. Stephen Davies in his Foreword (p.5) states that it is “*now timely to reinforce existing material with renewed technical advice.*” and “*this publication marks the beginning of a new phase in heritage reference material.*” It is important to understand what these statements entail in order to properly understand this Heritage Guide, given its concentration on design and the Better Places process.

The intended audience for the Guide is unclear and needs to be clarified. This, in turn, may help in the selection of examples/case studies and how these are discussed in the document. The Guide should not try to be 'all things to all people'. It should not try to replicate basic concepts and principles that are better covered in the many good heritage guidance documents available, including the Australia ICOMOS Burra Charter, the Illustrated Burra Charter, the Burra Charter Practice Notes, Design in Context, and other Heritage Council of NSW publications. Rather, it should identify the specific audience for whom it is intended and complement those other publications which now have wide acceptance within the community and within local government.

Section 1.2 *About this Guide* refers to several earlier publications and states "*this Guide incorporates material from these documents, and a draft guide to alterations and additions to heritage places, and supplements them with further information.*" The current Guide should not replace the existing documents but, rather, be written in a way that complements them. This needs to be clarified as the guide is lacking in the more detailed and important heritage advice contained in such previous publications.

The Guide "outlines principles to design a broad range of design work in heritage places in NSW. These relate to the principles that underpin the Burra Charter (p.12)". These design principles are the three elements of the Better Placed design process Discover, Create and Deliver 2.4 (p.40) to which the Burra Charter's three stage process can be correlated. Without a direct correlation, this inevitably creates some confusion. To help clarify this alignment, The Burra Charter process diagram needs to be illustrated so readers can have a clearer understanding of its scope and components. 'Discovery' should be equated with the first stage of the Burra Charter process '*Understanding Significance*' etc.

Under the *Discover* heading it is clear that a conservation management plan that results from the Burra Charter process covers virtually all the issues set out on pages 38 and 40. As this is a heritage document, this section needs to be rewritten to acknowledge this, so that the Burra Charter and any Conservation Management Plan are not sidelined as in the present text but become the main theme in describing the Discovery process.

In 2.3 the Guide "details" the seven Better Placed design objectives "in relation to heritage work" and illustrates each of them with an example. The illustrations in both 2.3 and 2.4 are extremely important. They are required to help elucidate complex heritage issues. The examples in some cases are considered to be poor choices and need to be reassessed with heritage experts to ensure the most relevant case studies are presented (see Comments Relating to Specific Items). In some cases the photos of the case studies seem to be taken to emphasise the architectural aspects rather than the heritage aspects and need to be replaced by photos that better explain the heritage considerations and how the Burra Charter heritage principles and (in the case of infill) the standard assessment criteria have been successfully addressed.

The explanatory text does little to address the range of heritage considerations/issues involved in each project. Given that this is a *Guide for Heritage*, the heritage considerations should be fully outlined for each example so that the reader understands the issues and why the illustrated examples represent good (or bad) heritage outcomes. The heritage professionals involved in each case should be identified as well as the architects. The heritage status of the place involved in each case should also be mentioned and whether there was a guiding Conservation Management Plan.

A wide range of examples should be included, from CBD commercial development, rural and suburban items, new infill as well as additions and alterations in heritage conservation areas. An example that incorporates conservation of a heritage building as an important component should be included (Sydney GPO for example) as part of the "wide range of heritage contexts."

More use should be made of photos and instructive captions given that heritage issues can be relatively complex. It is important to recognise that this is a Design Guide and as such sets out broad principles and basic information. In this role it needs to clearly guide readers to the various publications that provide the necessary additional detail that the Guide cannot provide e.g. “*Design in Context*” and “*New Uses*” that provide much more analysis and explanation for each of their case studies. It is not considered sufficient just to list references at the end of the Guide. Quotes need to be referenced with page numbers where appropriate and all references to the Burra Charter provided with an Article number.

Interpretation is an important aspect of much heritage work and there should be an example of this provided. Also ground works may involve both archaeology and/or decontamination. (examples include the Conservatorium of Music and the Mint).

The pictures of the Opera House refer to a World Heritage listed item and text needs to explain the role of the Conservation Management Plan and interactive heritage advice by Design 5 Architects with the Client, at this highest level of the heritage hierarchy.

SPECIFIC COMMENT ON THE DOCUMENT

p. 11 If the Opera House illustration is considered appropriate as a World Heritage listed building, then it needs explanatory text.

p. 12 Please following the citation information inside the front cover of the Charter – “The full reference is The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013. Initial textual references should be in the form of the Australia ICOMOS Burra Charter, 2013 and later references in the short form (Burra Charter).”

p. 13 Heritage Architects seem to be an important category missing from this list, not just Heritage Consultants.

p. 16 Bottom of page “... a problem best resolved through demolition.’ While true in some cases, this should be better phased by removing the reference to demolition.

p.16 & 17 The choice of the Lennox Bridge is obviously a controversial one and as such the explanatory text needs to deal with the issues in more detail. A second case study is needed here to counterbalance the Lennox Bridge example (*‘much loved and highly regarded’*). What other example were considered besides the Lennox Bridge?

p.18 The Guide quote from the Burra Charter last para. “Do as much as ...” should be in bold type given the importance of this quote. In the heritage context.”and framed by a carefully considered brief” needs to include “based on a Conservation Management Plan.”

It is suggested that the heritage aspects of the place should inspire the designer and text such as “New design should be inspired by the heritage values of the place and the inevitable constraints associated with heritage work challenge the designer to more considered and refined resolutions than might have been the case for a clear site.” be added. This issue is taken up on p.43 but should be mentioned here.

p.22 A reference is needed here to *Design in Context* which deals with these issues in greater detail and other relevant texts.

p. 23 The important issues mentioned on p.22 need at least a second case study. Why a night photo of the Crown Hotel?

p. 25 The new elements referred to should be itemised. Another example needed eg. Building 28, World War 1 Hospital, Georges Heights adapted for office use.

- p.27 Another example needed where community action helped in the process.
- p. 29 This is again a controversial example as it is debatable whether it really enhances the classical portico of the Gallery which is the outstanding architectural and heritage element. Main photo needs sun on ramp not shadow. There needs to be a second example.
- p.31 Is there a photo that better explains the interior? Fire rating of exposed timber beams should be explained. Second example former Bushells Building, the Rocks? Conversion into office space.
- p. 35 Is there a better example? why an evening photo? Another more exciting example for this interesting Objective 7.
- p. 37 The photo needs to show more of the side of the Metcalfe Bond building and text needs to explain the setting and why this approach is successful. The adaptive reuse of the Metcalfe Bond and the AS&N Company Building needs to be mentioned.
- p. 38 As mentioned under General Comments, the key issue here is to emphasise the importance and role of the Conservation Management Plan and the Burra Charter process. All 3 headings on this page are covered by a Conservation Management Plan.
- p. 39 Ballast Point text should mention decontamination and excellent interpretation of the site with a photo to show this. Who provided the heritage advice and Conservation Management Plan? Conway House: There are probably better examples than this. The interior is mentioned and there is no photo.
- p. 40 The headings on this page would be dealt with by a Conservation Management Plan. As this is a Guide only - the Burra Charter and Conservation Management Plan processes and content must not be subsumed by the Better Places Discovery format.
- p. 41 Lismore Regional Gallery: there have been significant interventions here so the heritage status of the building should be noted, as in all case studies. Presumably the interior did not have high significance and the interventions have resulted in an exciting new use.
- p. 42 *Design for the Context* at the end of this section add "*Refer to Design in Context for more detail.*"
- p. 43 How does this example work in context, how does the new building fit in the streetscape? Is it in a Heritage Conservation Area? The photo needs to show the whole picture.
- p. 44 Reveal protect and interpret: this section states "*an interpretation strategy should be prepared by an expert*". this is covered in the Conservation Management Plan and that needs to be made clear. It would be good to include a case study for this and reversibility.
- p. 45 Cowper Street : photos do not explain the text. This does not appear to be a good example. What other ones are there? This would be part of an HCA presumably. Was there a brief?
- p. 47 WSU: it is noted that this is the only well recognised heritage architectural firm to be represented. The text should mention the sympathetic design of the new building and retention of the chimney.
- p. 53 "*The preparation of a CMP should be guided by an appropriate brief.*" needs further explanation.
- p. 55 More appropriate examples should be considered. Architects work selected as case studies should be from firms that produce responsible professional work in relation to heritage. This would not seem to be the case with this architect.
- p. 62-63 what were the selection criteria for this list? Obviously there are other relevant publications.

In conclusion, Australia ICOMOS is supportive of the objectives of the Design Guide, however we believe there is scope for improvement to achieve a more relevant and practical document for use by the development sector in achieving better design outcomes and consistency in heritage practice.

In summary there is an over-emphasis on general design process in the Guide rather than on pithy helpful guidance for designing in a heritage context. Overall, the Guide is too long – the most important heritage design concepts are buried in the document. The Guide should refer readers to the parent Better Placed document(s) rather than repeating all of the procedural information.

Please note that this submission has been prepared with input from several of our more experienced Australia ICOMOS members who are working alongside developers, architects and contractors on a full range of developments in NSW. Several are registered architects in NSW.

Australia ICOMOS would be pleased to contribute to further discussions about *The Draft Design Guide for Heritage: Implementing the Better Placed policy for heritage buildings, sites and precincts*.

In addition, Australia ICOMOS understands that there are two joint publications from the Australian Institute of Architects (NSW Chapter) and the Heritage Council of NSW – “Alterations and Additions at Heritage Places” and “Heritage and Sustainability” - that are in an advanced and an early stage of preparation respectively. Australia ICOMOS urges that the publication of these important more detailed documents – along with updates of “Design in Context” and “New Uses” also be given priority.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Knaggs', with a stylized, flowing script.

Mary Knaggs

Acting President, Australia ICOMOS

cc Stephen Davies, Chair Heritage Council of NSW