



Our Ref: F2006/00524
Contact Officer: David Ongkili - 9093 6793

17 August 2018

The Manager – Heritage Committee
Heritage Council of NSW
PO Box A290
SYDNEY SOUTH NSW 1232

Dear Sir/Madam,

RE: DRAFT DESIGN GUIDE FOR HERITAGE

I refer to the Draft Design Guide for Heritage produced by the Government Architect New South Wales and the Heritage Council of NSW which is currently on public exhibition until 17 August 2018. Council submits the following comments for consideration in the review process.

Council notes that the Design Guide is part of a suite of documents to support the State Government's Better Placed Integrated Design Policy for the Built Environment of NSW. Better Placed aims to enhance all aspect of urban environments in NSW by guiding the design of better places spaces and buildings and thereby better cities, towns and suburbs. The Design Guide for Heritage identifies processes and principles that ensure good design for heritage buildings, sites and precincts, with a view to supporting and enhancing these items. The Design Guide includes a diverse set of case studies.

The Design Guide for Heritage is aimed at a wide range of groups including owners, architects, consultants, builders, government organisations and members of the community. It recognises that Planners can advocate for high quality design response to heritage places through statutory and strategic planning processes; and Local Government can identify the benefits heritage places bring, and develop tools to improve design outcomes through policies and initiatives. It is noted that a significant proportion of planners do not have a design background, and would benefit from familiarity with the Heritage Design Guide, but that real improvement of the design quality of our cities requires these principles to be incorporated in useable planning controls.

Council welcomes the emphasis in the Design Guide on sensitivity to and respect towards the character and qualities of heritage buildings and places. Council also welcomes recognition in the Heritage Design Guide of the broad range of processes involved in heritage design work including restoration, preservation, reconstruction, adaptive reuse, alterations and additions and infill development.

We note the discussion of character, grain, scale and form within the Better Fit section of the Design Guide, and that *"new design in heritage places should respond sympathetically to the character of the area. This includes relating to the predominant scale, respecting the height, density and grain of existing built fabric ... and designing new forms to be sympathetic to the predominate forms with the streetscape."* There are concerns that the substantial increase in densities which will be required to meet as yet undisclosed population targets will result in new buildings which will have a considerably greater scale than traditional building forms.

Heritage properties within Randwick City are predominantly of a one, two or three storey scale, while the scale of new development has not yet been defined. It is noted that the centres and facilities surrounding the Randwick Collaboration Area for example predominantly comprise gazetted heritage conservation areas, and include over one hundred heritage items. Examples within the Design Guide of how dramatic disparities in scale could be accommodated without dominating and overwhelming adjacent heritage development would be of considerable assistance.

Council welcomes the recognition in the Better Performance section of the Design Guide on the sustainability benefits of maintaining or adapting heritage buildings through retaining their embodied energy and reducing needed to produce new building materials.

Finally, Council notes that the Draft Design Guide for Heritage is targeted specifically at managing heritage design works, providing technical guidelines for heritage industry professionals, urban planners, developers and heritage owners. Council would request that this design guide process provide further guidance on the process and approach for preparing a heritage strategy for Council areas as part of the broader strategy for preparing Local Strategic Planning Statement under the LEP review and roadmap process. In this regard, the Design Guide should:

- provide clear strategies for taking account of, and managing, the cumulative impacts of development, particularly in transitional and urban renewal areas, on heritage significance values in these areas.
- be broadened to include strategies for interpreting heritage to foster distinctive local places.

Council looks forward to participate and contribute to the next stages of the heritage review process and would request that Council be kept up to date on any developments on this matter. Should you have any queries, please do not hesitate to contact David Ongkili, Council's Coordinator Strategic Planning, on 9399 0793.

Yours faithfully,



Alan Bright
Manager Strategic Planning