

29 October 2018

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Dear Sir/Madam

Subject: Draft Urban Design Guide for Regional NSW

Thank you for the opportunity to provide feedback in regards to the Draft Guide - Urban Design for Regional NSW. Council staff commend the aim to place urban design in the forefront of the built form processes, and the Department of Government Architects for this initiative to improve in urban design in regional NSW.

Council staff reviewed the Draft Guide and provide the following feedback. Comments generally range from the more general to the more specific. The comments are as follows:

1. The seven urban design priorities listed are commendable, but the 'how' for these to be applied across each region is easily lost. The Guide would benefit from an additional section providing clear and specific ways good design can be facilitated through key planning documents such as exempt and complying development codes, and development control plans.
2. Council staff recognise that the draft Guide aims to involve urban design early in the process to ensure it can positively influence the built form. ***How*** this is to happen is somewhat lost, given the Guide is part of an already complex planning process and a hierarchy of responsibilities e.g. when planning for pedestrians in main streets one of the issues is often the fact that such streets are designed and managed by the RMS.

Staff suggest a perhaps more effective approach might be to provide a structure and process for designing for places across state and local agencies, whether part of State Infrastructure Delivery or for any situation where a state road or other state owned property passes through a town centre (or plays a big role in an area).

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3. Section 2 Town centres and main streets, particularly around the section on improving connectivity, walkability and cycling provides fairly generic and important aspirations to improve streetscape amenity to increase walking and cycling and to locate community infrastructure in town centre walking catchments to encourage walkable access.

These aspirations could be found in strategy for most government documents such as Transport for NSW's – Future Transport 2056, RMS's Beyond the Pavement, the DPE's Greater Newcastle Metropolitan Plan, and various other state policies. What is needed is a clear structure or process to bring state and local government together in the design process – something that could be extremely useful and potentially very fruitful. Unfortunately, experience with on the ground planning is that the state government's risk adverse approach often leads to an aim to separate pedestrians and vehicles at speed, over slowing traffic and sharing spaces and places.

4. Section 3 Infill development in existing neighbourhoods - raises the need for improved cross government coordination and approaches. Particularly, in the area of revitalising main streets and regional town centres and improving connectivity, walkability and cycling.
5. Section 4 Greenfield Development – provides for a particularly difficult area for local government. The state approval processes are streamlined with targets aimed for quick approvals; and complying development encourages single detached dwellings of relatively low density, making it difficult to meet aspirations for housing diversity, and climate impacts.
6. The Regional profiles in the draft document provide some data, however across each region is great variability, and separating the regions misrepresents the diversity of matters requiring consideration across non-metropolitan parts of the state.
7. Section Hunter Region is too generic and the “Challenges and opportunities for urban design for the Hunter Region” could refer to almost anywhere, for example ‘meeting the needs of the ageing population’ and ‘diversifying the local economy of some areas and town centres’ do not really help us change the built form.
8. Similarly, “improving integration of urban planning and transport planning to reduce car dependency and improving connectivity to public transport services and active transport such as walking and cycling”, could be affectively addressed with a cross government approach. Schools, transport providers and approval streamlining are all state and privately managed but could better achieve this aim with structured coordination between these agencies.
9. In the “where it fits” section the document completely misses how this Guide works in with the approval processes, codes and guides the State government has in place.
10. Understanding Urban Design Priorities in Section 1.4 needs to be more specific.

11. Matters identified in Section 3.2 Key Regional Trends are a mix of characteristics, potential opportunities, trends and some are opinions. These appear to be more matters needing to be researched and considered as part of the design process.
12. Section 7 on responding to climate impacts needs, could be strengthened and clarified. It may be better to differentiate between firstly design for the climate and future variability, and secondly designing to mitigate carbon emissions to minimise climate change. Consider a design objective to achieve carbon neutral development.
13. Additional information should be provided on how to ensure the public interest is identified and considered in the design process.
14. The references to biodiversity in the draft document do not represent the complexity of natural ecological processes and the need for specific design guidance when planning for biodiversity. Particular regard is needed for the ecological planning of a site, considering that in most urban settings vegetation (other than retained natural vegetation) primarily contributes to amenity rather than biodiversity.

Should you require further information, please contact me via my details below.

Yours faithfully



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