PIA RESPONSE: BETTER PLACED – A DRAFT ARCHITECTURAL AND DESIGN POLICY FOR NSW

The Planning Institute of Australia (NSW Division) welcomes the opportunity to comment on BETTER PLACED, a draft Architectural and Design Policy for NSW prepared by the Government Architect of NSW. This submission has been prepared by members of the Planning Institute of Australia (PIA).

The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has approx. 5000 members nationally and 1,300 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating key planning and public policy issues.

The Institute is delighted that the NSW Government has proposed an amendment to the EP&A Act to include a new object “to promote good design in the built environment”. We consider that well designed places create long term value for individual, communities and cities and that a well-designed urban infrastructure is critical as NSW continues to grow. As Steve Jobs, former CEO, Apple stated “Some people think design means how it looks. But of course, if you dig deeper, it’s really how it works.”

Well designed systems, places and buildings don’t occur by chance. It takes time and skill to generate, iterate, test and challenge options in order to effectively resolve design challenges so that the greatest value is often achieved. This is also why it is critical to consider design early in the process and as a key driver of decisions throughout the process.

PIA do not consider that design is an optional or even an expensive “add on” to the planning process and to developing, expanding and reshaping our cities. As Dr. Ralf Speth, CEO Jaguar once tweeted, “If you think good design is expensive, you should look at the cost of bad design.” The built and natural environment quality improves productivity, liveability and sustainability, the three fundamental planks of the District Plans. High value jobs do not generally occur in poor quality built environments and without these environments, Sydney will fall behind as a Globally competitive city. PIA considers that the effective design of the urban environments is critical to the long term economic health and prosperity of NSW.
Better Placed

The Government Architect is to be commended for the thoughtful and very detailed draft document. We see the role of this document as threefold:

1. To empower design excellence throughout the planning and development processes of NSW. This does not mean “gold plating” the infrastructure or buildings but it does mean that all parts of the urban environment are designed to maximise the value that they can bring to the urban environment.
2. To recognise, reward and celebrate effective design and design excellence and to build greater awareness of the value of design.
3. To build increased understanding of design in the community, businesses and infrastructure providers.

Title of the document

To link the policy with the Act the title should have the word “design” in it. We would recommend the title “Design of Better Places” with the subtitle: “A design integrated approach for the urban environment of NSW”. We would not recommend the use of the term “design led” as it is a term that is often misunderstood.

The structure of the document

We recommend that the document has the stamp of the authority of the NSW government. The structure of the document should more clearly state:

- Who the document is for and who is expected to use it,
- The importance of good design and a clear set of principles can be used throughout the planning process to show organisations, clients, courts what is expected,
- The recommended implementation process to ensure the design is a key consideration at all stages from strategic planning, infrastructure planning and down to the design of individual buildings and public spaces.

The Principles of the document should be checked against the Apartment Design Guide (ADG) design principles and be as consistent as possible. It is thought that the ADG principles are sufficiently generic and these could be used and expanded them in this document. If a new set of principles are used in the “Design of Better Places”, the next iteration of the ADG should be revised to be consistent with these principles.
PIA recommended that rather than have separate sequential focuses - cities, public realm, buildings - it may be better under the explanation of each principle to provide an example under each of the 3 categories.

**Implementation**

While this document is an important step towards embedding a culture that values the design of our built environment. PIA also consider that there are a number of other avenues that will also need to be incorporated into the process to ensure good design is achieved across the state.

Under the responsibility of the state government these are:-

- Design should be fully integrated within the EP&A Act, 1979, not just in the objective of the Act but also as a head of consideration in Clause 79C, as well included as items within part 4 and 5 of the Act.
- The criteria for good design should be incorporated into current and future SEPPs, including state significant development and state significant infrastructure.
- Objectives and criteria should be included by the Secretary in EIS requirements.
- The government should lead by example and should incorporate requirements for design in the Precinct Plans that DPE manage and implement.
- Design should also be included into S117 Directions, as well as principles in the Regional or District plans.
- The Policy should be one of the Premiers Priorities, with the NSW Cabinet ensuring that good design principles and objectives are included within all government infrastructure projects. In particular design should be incorporated in the TfNSW Transport Impact Guidelines.

At the local level the biggest impact will be achieved by:

- Changing the standard Instrument LEP, as well as all LEPs so that it includes design of the built environment as a key consideration.
- In key places/areas of NSW provide design criteria and/or design competitions/ formal design review processes in LEPs. PIA NSW is of the view that this is where the biggest change in culture can occur.
- Including reference to design of places and built form in all Development Control Plans. PIA NSW is of the view that this is where the second most important mechanism to achieve good outcomes.
Having design in the objects of the Act would allow councils to raise the issue at Pre-DA meetings and during the DA process.

Councils should also lead by example and include good design in their own projects and precinct planning.

PIA NSW recommends that the document has less of an emphasis on the role of the Government Architect and more on the responsibility that all Government agencies and property development organisations have in regard to ensuring the design quality of our built environment. This would also allow the Government Architect to provide support to other agencies including education and training, design reviews and recommendations on policy and processes.

PIA NSW is also of the opinion that there would be substantial benefit if good design and the link between good design and effective spatial planning was more of a focus in education courses at universities and colleges. PIA NSW also believe that there is a need for more courses (that could be run by Universities and/or State and Local governments) that explain the value that well designed environments have on the long term success of buildings, urban environments and cities. These courses could also be made available to Councillors and the wider community in order to widen the understanding of the key issues at the ground level, and to start to build more of an understanding of the importance of design and encouraging a stronger design culture across NSW.

PIA NSW also consider that case studies and examples of good design are critical to influencing designers, stakeholders, decision makers and the wider community. As Bob Meyer, an eminent NSW planner states "the language of urban design is examples". The development of the Residential Design Pattern Book as a resource of ideas and precedents was part of the success of the Residential Flat Design Code (which has now been revised to become the Apartment Design Guide).

CONCLUSION

PIA NSW supports the need to integrated design and good design outcomes of both the built form/place as well as the surrounding area. The value of planning is to achieve a good place and outcome for the community. In this respect there is no one body responsible for good design, no one professional body and also the wider community has a role to play. PIA acknowledges that at the initial stages state government agencies, local councils and consent authorities have the best direct influence on ensuring better design outcomes across NSW.

Yours Sincerely,
Jenny Rudolph RPIA

PIA NSW President