



Australian  
Institute of  
Architects

# Draft Design Guide for Heritage

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Submission to

Government Architect NSW

Submission issued

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NSW Chapter

Tusculum, 3 Manning St

Potts Point NSW 2011

## SUBMISSION BY

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## PURPOSE

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This submission is made by the NSW Chapter of the Australian Institute of Architects to GANSW in response to the Draft Government Architect's Design Guide for Heritage.

At the time of the submission the office bearers of the NSW Chapter (Australian Institute of Architects) are: Andrew Nimmo (President), Shaun Carter (Immediate Past-President), Elizabeth Carpenter, Liz Westgarth, Kathlyn Loseby, David Tickle, Gemma Savio, Monica Edwards, Callantha Brigham, Jacqui Connor, Sam Crawford, Michael Tawa, Tricia Helyar, Peter Kemp and Chloe Clayfield. The Executive Director for the NSW Chapter is Joshua Morrin.

This submission was prepared by Hector Abrahams and Kate Concannon for the NSW Chapter Council.

## INFORMATION

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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 12,000 members across Australia and overseas. More than 3,000 of these are based in NSW.

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.

## 1. Overview

The Australian Institute of Architects (the Institute) appreciates the opportunity to comment on the *Draft Government Architect's Design Guide for Heritage* (the Guide).

On behalf of the Institute I am pleased to submit our response to the public review of the *Design Guide for Heritage Issue no.1 2018 working draft*. We are grateful for the two consultations from your office, one to the NSW Chapter's Built Environment Committee on 28 June 2018 and the other to the Heritage Committee on 25 July 2018.

The Institute recognises and values the Guide's intention to: (1) promote awareness and appreciation of 'why heritage matters'; and (2) encourage sensitive and inventive design responses to heritage contexts that make good use and contribute to our shared cultural fabric for future generations.

As the draft stands, it contains some very good quality content and we note that the treatment of the issue of finding a new use is done particularly well, as the bibliography. There are however in our view improvements that can be made to render its purpose and context clearer to its wide-ranging audiences and to develop the cohesiveness of its content.

Key recommendations for addressing these issues are as follows:

1. Set out clearly the purpose of the Guide and its relationship to the broader legislative and policy frameworks and state its intentions with respect to measuring its effect. Include a statement that the Guide is general in nature and neither can nor should be used as a substitute for site specific heritage advice or the design skills of heritage architects.
2. Articulate a complete set of principles, measures and qualitatively defined outcomes to underpin the Guide as a whole.
3. Review how the *Better Placed* design objectives and design process frameworks are presented – this may necessitate a revision of the structure so that these are treated in a less parallel, more integrated fashion.
4. Review the structure of the Guide as a whole to improve logic, flow and cohesiveness while reducing repetition. Specifically, we recommend placing content currently contained in Part 3 up front in Part 2.
5. Chose case studies to illustrate principles. Selection should ideally reflect a diversity of project types and a range of budget scales. The inclusion of case studies demonstrating successful adaptation and precinct/urban renewal scale is also recommended.

I understand the role of the current draft is to allow a very broad consultation to the design professions and heritage community to canvas responses towards an improved Guide. The Institute is pleased to accept the recent offer by GANSW of a place on the advisory board/review panel that is charged with developing subsequent iterations of the Guide. As a participant, we look forward to the opportunity to contribute and offer our assistance with actioning the key recommendations listed above.

Finally, regarding the structure of this submission: whilst we propose a modified structure be adopted in the next iteration of the Guide, we have arranged the following content-specific feedback in a sequence consistent with the draft document's order.

## Feedback

### Part 1 – Introducing the Design Guide for Heritage

#### 1.1 Why heritage matters

**Comment** Here and elsewhere in the Guide some common use words that have specific technical meaning within the context of heritage are used, eg 'interpretation'. While a number of these are explained in the glossary, many readers would not be expected to know these particular meanings and the text neither provides definitions up front nor flags these as key glossary terms.

**Recommendation**      **1.1.1** To help readers achieve a deeper understanding of the document, provide definitions of key conceptual terms as they occur, or establish a system of highlighting these to prompt readers to consult the glossary.

#### 1.2 About this guide

**Comment** In explaining the role of the Guide as providing principles of/for design work in heritage places, this section refers to the principles as structured in terms of the design objectives outlined in the NSW Better Placed Integrated Design Policy and claims they relate to the principles that underpin the Burra Charter. However, the Burra Charter's principles concern the conservation of significance and have no parallel relationship to abstract principles of design. The relationship between the Burra Charter's principles and those of the Guide is not clearly explained.

**Recommendation**      **1.2.1** Position the Guide clearly in its legislative and policy context. Explain how it relates to Better Placed, the Burra Charter, Environmental Planning and Assessments Act and Heritage Act in a way that makes it clear why someone would use this Guide and what it provides that the other relevant references do not.

#### 1.3 How to use this guide

**Comment** The Guide claims a very broad audience, from owners to architects, local governments and politicians. We note that the assumed knowledge for each of these audiences differs

significantly, as does the expected purpose of the Guide for them.

<b>Recommendation</b>	<b>1.3.1</b>	The Guide should advise that its purpose is to provide an overview of the framework in which heritage design is conducted and of the principles that underpin good heritage design (including how these relate to the Better Placed design objectives), but that it is not intended to replace specialist advice. It would also be useful to identify up front key paths to obtaining appropriate expert input.
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## Part 2 – Better Design for Heritage

<b>Recommendation</b>	<b>2.0.1</b>	This part and Part 3 should be swapped around in order so the reader gains an understanding of what heritage is, what significance is, and how it is assessed and regulated etc before reading about what better design for heritage might involve. Some adjustment of the order of the existing Part 3 is also recommended – see later comments on this part.
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### 2.1 What is heritage?

<b>Recommendation</b>	<b>2.1.1</b>	This content could be distilled and repurposed alongside the content of 3.2 to provide an introduction to the existing Part 3 (which, as per recommendation 2.0.1 above, is proposed to be switched around with Part 2). Subheadings would be a helpful way of structuring this introduction and breaking down the content into its component ideas/issues.
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**2.1.2**

### 2.3 Better Placed objectives

<b>Comment</b>		The treatments of each <i>Better Placed</i> design objective in terms of how it relates to the heritage context are an important and valuable inclusion. Additionally, the ‘How does this create better outcomes?’ box-outs provide a valuable and effective summary of the benefits that can be achieved through them. However, the treatments generally lack clearly articulated principles and strategies to apply in order to realise the objectives’ aims in heritage work.
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<b>Recommendation</b>	<b>2.3.10</b>	Clearly and succinctly articulate headline principles and strategies relating to each objective, giving these prominence on the page through font/layout etc.
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**Objective 1. Better fit – contextual, local and of its place**

**Comment**

The overarching principle expressed here is to maintain existing character by responding sympathetically. The relevant considerations are then presented in two groups – character, grain, scale and form in one group, and siting configuration and landscape in the other. A more expansive treatment of this objective should be considered given its significance to heritage work.

**Recommendation**

**2.3.11**

We suggest removing 'character' from the subheading as is not of the same order as grain, scale, configuration etc; rather it is the overall quality these factors effect.

**2.3.12**

Introduce additional character considerations including:

- Structures' relationship to land and sky
- Relationship to natural systems

**2.3.13**

Clearly and succinctly articulate headline principles and strategies, giving these prominence on the page through font/layout etc. Suggested inclusions:

- Understand existing urban relationships and ensure interventions contribute to these positively and sensitively
- Consider relationships to the style of existing buildings

**Objective 2. Better performance – sustainable, adaptable, durable**

**Comment**

This section contains a general reflection on the potential to find durability, improve performance, and integrate new environmental strategies. However, it does not clearly articulate specific principles or strategies.

**Recommendation**

**2.3.14**

In 'Retaining/reducing embodied energy', delete '(typically much more than energy running costs)' as this point is restated (better) in the last paragraph under this subheading.

**2.3.15** Clearly and succinctly articulate the headline principles and strategies relevant to this design objective and give these prominence on the page through font/layout etc. Suggested inclusions:

- Analyse opportunities and constraints of the existing structures, systems and site
- Analyse existing maintenance strategies
- Identify and rejuvenate effective passive design systems where present and consider removing performance-comprising later additions
- Preserve embodied energy where possible through retaining and recycling original materials
- Consider integrating new elements and initiatives to improve existing structures' environmental amenity and sustainability performance

**Objective 3. Better for community – inclusive connected and diverse**

**Comment**

This section is a restatement of the value that community ascribe to heritage and the potential social value of heritage regeneration and interpretation. Specific principles and/or strategies are not explicitly presented.

**Recommendation**

**2.3.16** Clearly and succinctly articulate the headline principles and strategies relevant to this design objective and give these prominence on the page through font/layout etc. Suggested inclusions:

- Investigate cultural significance first at the outset
- Ensure future possibilities for change of use are maximised
- Assess impacts of the mode of delivery

**Objective 4. Better for people – safe, comfortable and liveable**

**Comment**

This section makes the important point that good design has an important role to play in upgrading for amenity and compliance as well as economic renewal.

The illustrated example of the equitable access to the Art Gallery of New South Wales is a high-end solution to a high-end client.

Specific principles and/or strategies are not explicitly presented.

<b>Recommendation</b>	<b>2.3.17</b>	Consider a more broadly applicable case study. As indicated in the overview, the Institute is willing and able to provide specific recommendations and content for case studies for use across the publication.
	<b>2.3.18</b>	Clearly and succinctly articulate the headline principles and strategies relevant to this design objective and give these prominence on the page through font/layout etc. Suggested inclusions: <ul style="list-style-type: none"><li>• Understand heritage buildings as works of design</li><li>• Analyse existing circulation</li><li>• Analyse existing urban relationships</li><li>• Engage highly skilled consultants to deliver collaborative solutions that balance compliance with heritage significance</li><li>• Promote equitable access and walkable communities</li></ul>

**Objective 5. Better working – functional, efficient and fit for purpose**

**Comment** This is the most straightforward treatment of a design objective in the report.

<b>Recommendation</b>	<b>2.3.19</b>	Clearly and succinctly articulate the headline principles and strategies relevant to this design objective and give these prominence on the page through font/layout etc. Suggested inclusions: <ul style="list-style-type: none"><li>• Retain existing use where this is both integral to heritage significance and feasible in terms of contemporary standards</li><li>• Establish common understanding of appropriate reuses early and in consultation with professionals and local council and/or Heritage Council of NSW</li><li>• Ensure future possibilities for change of use are maximised</li></ul>
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**Objective 6. Better value  
– creating and adding  
value**

**Comment**

This section advocates effectively for good design, demonstrating how it can produce positive economic impacts through inventiveness, retention of specialist trade skills, increased valuation of site and surrounds as well as broader community and cultural benefits.

**Recommendation**

**2.3.20**

Clearly and succinctly articulate the headline principles and strategies relevant to this design objective and give these prominence on the page through font/layout etc. Suggested inclusions:

- Undertake cost assessment early in the planning stages
- Identify applicable financial incentives/concessions
- Engage specialist trades where appropriate
- Consider maintenance costs in the design process

**Objective 7. Better look  
and feel – engaging,  
inviting and attractive**

**Comment**

This section presents some very important principles that should be carefully reflected in heritage work. There seems to be an underlying directive to observe contemporary styling in new design work. Is this intended?

**Recommendation**

**2.3.19**

Clearly and succinctly articulate the headline principles and strategies relevant to this design objective and give these prominence on the page through font/layout etc. Suggested inclusions:

- Design new work to complement not compete with existing work
- Create new work to exemplify design excellence in its own right
- Respond sympathetically to existing planning and spatial structures
- Retain existing use where this is both integral to heritage significance and feasible in terms of contemporary standards

- Establish common understanding of appropriate reuses early and in consultation with professionals and local council and/or Heritage Council of NSW
- Take an informed and strategic approach to materials and details: consider their character and history, and identify opportunities for new and existing work to communicate through referencing and selection of these elements

## 2.4 Design process

<b>Comment</b>		The content here is instructive and helpfully expressed in terms of specific strategies, however, there is some repetition of ideas presented in 2.3. This section restates much of the subject matter covered in the treatment of the Better Placed design objectives but does not relate/integrate these objectives with the design process. As a result, the Guide may be seen as presenting two parallel frameworks for approaching heritage work.
<b>Recommendation</b>	<b>2.4.1</b>	Consider integrated approaches (thematically and structurally) to presenting the design process and Better Placed design objectives to (1) minimise repetition and (2) demonstrate how they relate to/support each other.
	<b>2.4.2</b>	Carry through overarching principles that should be articulated in 2.3.

## Part 3 – Explaining heritage

<b>Comment</b>	As mentioned in Part 2 recommendations above, to improve the logic of the Guide’s structure it is suggested that 2.1 ‘What is heritage?’ be moved to this part as its first section and that Part 3 as a whole be repositioned as Part 2.
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### 3.1 Heritage lists

<b>Comment</b>	This section provides an account of the statutory and non-statutory environment wherein places that have been assessed as having heritage significance are recognised, but does so before the Guide has established what heritage significance is and how it is assessed.
<b>Recommendation</b>	<b>3.1.1</b> Swap the order of the existing sections 3.2 and 3.1.

#### **4. Glossary**

##### **Comment**

The Burra charter is not included in the glossary and some definitions could be more accurate.

##### **Recommendation**

**4.1.1**

Review existing definitions in consultation and incorporate additional entries, including the Burra Charter.

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#### **5. References**

##### **Comment**

This is a particularly good overview of the technical material available.

##### **Recommendation**

**5.1.1**

The web references would be more useful if they had web addresses in print version. Digital copies should include links.

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We thank GANSW for the opportunity to give feedback on the draft Guide and hope to have the opportunity to participate substantially in developing the next iteration.

If any clarification around the feedback we have provided is required, please contact the Institute on 02 9246 4055 or email [nsw@architecture.com.au](mailto:nsw@architecture.com.au).

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Nimmo'.

Andrew Nimmo

**NSW Chapter President**

Australian Institute of Architects