

7 April 2017

Ms Carolyn McNally
Secretary
Department of Planning & Environment
Level 22
320 Pitt Street
SYDNEYNSW 2000



Australian Institute of Architects

Dear Ms McNally

INFRASTRUCTURE SEPP

The Institute's vision is design – communities – public good. This is why design is critical in the way that we both procure and develop our infrastructure.

The Institute supports the reduction of unnecessary infrastructure approvals, noting that many of these do little to support or improve the quality of the public domain.

However, we are concerned that poorly considered and designed infrastructure and “ad hoc” additions to or within public places, buildings and amenities can and frequently have had unfortunate impacts. Complying development status for infrastructure agencies should not be seen as a means of bypassing due process, but as a way of ensuring that important infrastructure projects are not unnecessarily delayed.

It is therefore strongly suggested that to “earn” complying development status for their projects, infrastructure agencies (and/or their sub-contractors) should be required to prepare and make public as part of public consultation and transparency of process:

- their objectives, policies and design criteria.;
- the procedures that they follow when designing and carrying out works that affect the public domain;
- changes to facilities used by the public;
- changes to items of heritage significance and;
- identify private property likely to be affected by their proposed works.

Complying development status should only be given to infrastructure projects if the proponent uses suitable design principles and procedures to formulate the proposal. The Institute suggests that the Office of the Government Architect or related groups in Transport for NSW and the RMS Centre for Urban Design could be involved in the preparation of such design guidelines.

As an example, the Roads & Maritime Services design criteria and procedures set out in *Beyond the Pavement* is a good example of such a package of design principles, criteria and procedures. These have been successfully used for some years to help guide route selection and establish procedures for the design of motorways and road projects of all scales across the State in ways that respect the public domain and rural landscapes and ecologies.

Such an approach also has the benefit of reducing time spent in environmental assessment and in the resolution of conflicts because contextual issues are dealt with as part of the design process.

Agencies should also be encouraged to prepare plans of management or master plans for their facilities which will help guide future development in a planned and strategic manner.

In addition, the Institute notes that there should be limitations on exempt infrastructure development such as the following:

- changes to significant heritage items should not be considered exempt;
- changes to areas of significant environmental importance should not be considered exempt.

This submission was prepared by the NSW Chapter Built Environment Committee for Chapter Council.

Thank you for this opportunity to comment on the draft changes.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Nimmo', followed by a period.

Andrew Nimmo
NSW President