

Submitted on Mon, 28/02/2022 - 17:38

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Deena

**Last name**

Ridenour

**I would like my submission to remain confidential**

No

## Info

**Email**

[Redacted email address]

**Suburb/Town & Postcode**

Darlington 2006

**Please provide your view on the project**

I am just providing comments

**Submission**

University of Sydney submission attached as pdf.

I am getting a warning sign that the upload may not be working. If this is the case, please email me for a copy of the attached.

**I agree to the above statement**

Yes



## Design + Place SEPP Submission

### School of Architecture Design and Planning, University of Sydney

28 February 2022

The University of Sydney's School of Architecture Design and Planning is pleased to provide a submission on the Draft Design and Place Statement of Environmental Effects (DP SEPP) – Public Exhibition.

#### Support for Design in the Planning Process

As an established leader in tertiary education in the built environment, the University strongly supports the elevation of design and the inclusion of accredited design professionals in architecture, landscape architecture and urban design, within the planning process. Making good cities for everyone requires design leadership and a partnership between the design and planning professions

The University supports the specific reference to urban design in the DP SEPP as a discipline related to, but distinct from landscape architecture, architecture and planning. Urban design is a synthesising discipline that operates at all scales and all stages of the planning process. Urban design translates physical form and spatial guidance into strategic planning and urban policy and defines physical form parameters to guide more detailed designs and development that follow across both the public and private realms.

#### Urban design education and role in achieving the SEPP's goals

The University is a leader in urban design education in Australia and has the longest standing current program in NSW. Our graduates are skilled to bridge the concerns of architecture and planning, think strategically, appreciate scale and qualities of place and communicate urban design principles to a wide range of audiences.

The University offers post graduate degrees in Master of Urban Design and Master of Urbanism (Urban Design). Over the past 10 years enrolments in the Master of Urban Design has increased 424%, demonstrating a significant demand in urban design education and growth in the profession. Our student cohort primarily have undergraduate built environment degrees in architecture, landscape architecture, and planning, although a few have degrees from other related disciplines such as geography.

Urban design operates as an integrated discipline that includes a broad range of knowledge and skills including but not limited to economic, environmental, social, spatial and infrastructure planning, housing, urban data science, place-making and governance. At the core of our students' learning is design skills and design thinking. Our students learn in partnership with local and State government on real world scenarios and investigate through design how alternatives to business as usual can solve our current and future urban challenges. Our graduates understand that design is a process not just an outcome.



### Definition of Urban Designer

The University supports the increased role and recognition of qualified urban designers and expertise under the DP SEPP. The policy's focus on qualitative guidance and merit assessment relies on specialist urban design expertise to guide, evaluate, and assess design proposals over 1ha. However, the proposed definition of urban designer does not recognise education, professional qualifications, core competencies and practice experience of urban designers, which are fundamental to the design process, design verification and design review processes underpinning the DP SEPP. The definition is particularly silent on urban design university qualifications, which are vetted by industry bodies such as Planning Institute of Australia, and long recognised as a critical underpinning of professional practice.

The University appreciates that the policy is a lever and that an accreditation process is the remit of a professional body. DPE has a responsibility to ensure that the definition and recognition of urban designers in this SEPP supports and does not diminish the urban design profession as it formalises recognition pathways. I urge consideration of a definition of urban design that addresses all of the following:

- a) **University Qualifications** – Urban design specialisation is underpinned by university qualifications in the built environment.
- b) **Core competencies** – Urban designers have multi-faceted skills and synthesise knowledge through design across the built environment professions and coordinate across project team disciplines. At the foundation of urban design practice is built environment *design* as a core competency.
- c) **Professional experience** - Design skills, especially for complex projects at an urban scale take time and experience to develop. Design disciplines have at least 4 years design education followed by many years of professional design practice to develop their skills. Further, in order to effectively support the DP SEPP requirements substantial design experience (greater than 5 years) would be needed.

### Recommendation

In light of the above, our recommendation is that the definition of urban design be amended in the final instrument, to incorporate the necessary qualifications as well as core professional competencies confirmed through peer recognition. We suggest that the definition of urban designer include the following core elements:

- 1. *university qualifications relevant to urban design in the built environment; and*
- 2. *professional experience in design roles in precinct design and master planning, and*
- 3. *recognition of core qualification and experience by a professional body.*

Please do not hesitate to contact [REDACTED]  
[REDACTED] should you require any further information.



THE UNIVERSITY OF  
**SYDNEY**

The University has consulted and collaborated with a number of industry and government partners, professional bodies and experienced practitioners in preparing submissions on the Draft DP SEPP. The University recommends further refinement of the policy and supporting guidelines in consultation with urban design practitioners and educators.

The University welcomes future discussions and thanks you for the opportunity to engage in the drafting of this important policy.

Sincerely,

**Professor Robyn Dowling,**  
Head of School and Dean

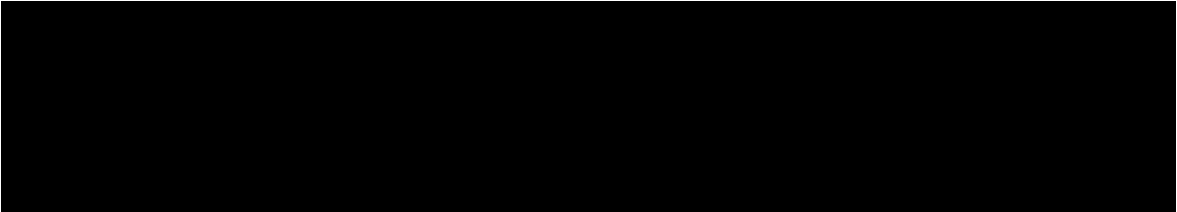
**Professor Nicole Gurran**  
Head of Urbanism

**Associate Professor Nancy Marshall**  
Director Master of Urban Design and Master of Urbanism (Urban Design)

**Associate Professor of Practice (Urban Design) Deena Ridenour**

References:

Ridenour, D and Alizadeh, T 2020, 'Designing Cities' in Rogers D, Keane A, Alizadeh T and Nelson J, *Understanding Urbanism*, Springer, Singapore.



Submitted on Mon, 28/02/2022 - 17:42

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## 1.1 NAME

**First name**

James

**Last name**

Weirick

**I would like my submission to remain confidential**

No

## 1.2 INFO

**Email**



**Suburb/Town & Postcode**

McMahons Point 2060

**Please provide your view on the project**

I object to it

**Submission file**

[design-place-sepp---weirick-submission\\_220228.pdf](#)

**Submission**

I object to the Draft Design & Place SEPP (and associated documents), and the proposals advanced in the 'New Approach to Rezoning' Discussion Paper. For the basis of my objections, please see the attached document 'design & place sepp - weirick submission\_22.02.28.pdf'

Regards,

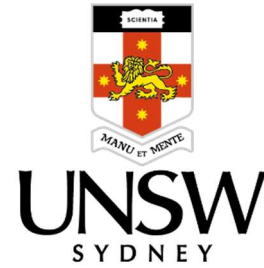
Emeritus Professor James Weirick

**I agree to the above statement**

Yes

28 February 2022

Mr Michael Cassel, Secretary  
NSW Department of Planning & Environment  
4 Parramatta Square  
Parramatta, NSW 2150



EMERITUS PROFESSOR JAMES WEIRICK  
School of Built Environment

Dear Mr Cassel,

**Draft Design & Place State Environmental Planning Policy (SEPP)  
Discussion Paper: A New Approach to Rezoning**

Thank you for the opportunity to comment on the Draft Design & Place SEPP, its associated documents (Draft Urban Design Guide, Draft Apartment Design Guide), and the December 2021 Discussion Paper, *A New Approach to Rezoning*.

I commented on the proposed Design & Place SEPP at the first round of public consultation when the 'Explanation of Intended Effects' was issued earlier this year.

As stated in my submission, dated 28 April 2021, I served on the Urban Design Advisory Committee of the then-NSW Department of Urban Affairs & Planning in 2000-2003, which advised on the preparation of SEPP65 - Design Quality of Residential Apartment Development, and the Residential Flat Design Guide (forerunner of the 2015 Apartment Design Guide).

I further stated in my submission that I was pleased to see the NSW Government extending the application of design principles to the process of urban development across the State under the proposed Design & Place SEPP. I was concerned, however, that in the detailed provisions of the SEPP, put forward at that time, there seemed to be a critical weakening of the provisions introduced in SEPP65.

Reviewing the Draft Design & Place SEPP and associated documents released for the second round of public consultation, my concerns have deepened. I object to the Design & Place SEPP, and the 'New Approach to Rezoning' on the following grounds:

- (1) The Draft Design & Place SEPP is the wrong instrument to achieve design excellence in urban development, it is too complex and cumbersome to be implemented in any effective way.
- (2) A SEPP stating principles, similar to the 'The Minister's Planning Principles' issued by the previous Minister, Dr Robert Stokes in December 2021, may be worthwhile as a general guide to plan-making in NSW. A SEPP attempting State-wide imposition of detailed 'Design & Place' controls based on subjective values is doomed to failure.
- (3) SEPP65, grounded in evidence-based controls for apartment design, should be retained as a powerful protector of residential amenity.
- (4) 'Design & Place' controls aimed at achieving design excellence for urban development overall should be set at LEP level to be responsive to the particularities of place.

- (5) The NSW planning system does not need a new, cumbersome SEPP. It needs stronger LEPs.
- (6) The LEP/DCP system established by the *NSW Environment Planning & Assessment Act 1979* was never strong in achieving design excellence at urban precinct scale but what capacities it had were seriously weakened by the introduction of the 'Standard Instrument' for LEPs under the *Standard Instrument (Local Environmental Plans) Order 2006*.
- (7) The 'Standard Instrument' template set 'Principal Development Standards' in Part 4, including standards for Height of Buildings and Floor Space Ratio (Parts 4.2-4.5), which although 'optional' were widely, if not universally, adopted in the hurried re-writing of LEPs across the State.
- (8) These controls were grafted onto LEP zonings without sufficient analysis of their physical effects. As a result, they were often found to be unworkable at site specific scale. This has led to contorted conforming schemes, 'spot rezonings' for non-conforming schemes, endemic uncertainty for citizens and the development industry, increased development delays, increased development costs and piecemeal outcomes all round.
- (9) Imposition of the 'Standard Instrument' template also eliminated the one 'Design & Place' system of controls in NSW actually in operation at the time: the innovative Warringah LEP 2000 (WLEP 2000) structured on far-sighted 'place management' principles.
- (10) WLEP 2000 did not conform to the 'Standard Instrument' template and was replaced with a conventional, non-place-based instrument in 2011 (WLEP 2011).
- (11) The Warringah experiment, however, should have formed the basis for the current 'Design & Place' initiative.
- (12) WLEP 2000 divided the Local Government Area into precincts, each with a Locality Statement that combined SEPP/REPP/General Principles with a Desired Future Character Statement, Land Use Tables and Built Form Controls.
- (13) As detailed by Untaru (2002), the Locality Statement was 'the summation of the development controls applicable to the defined area,' which were 'tailored to meet the needs of each specific locality. In effect, the Locality Statement and its DFC outline(d) the type and form of development that can occur in the locality as well as the siting, pattern, scale and the way it relates to any special natural features . . . . The Locality Statements set a new emphasis . . . on spatial and urban design issues. They identify how new development will relate to its surroundings, the natural landscape and the public domain. Notions of town character (were) formally addressed for the first time.' WLEP 2000 emphasised 'the importance of contextual urban design, (with) new development . . . evaluated not as isolated projects, but as integral components of existing urban and natural settings. They should strengthen and enhance place identity, the characteristics of the setting and at least maintain key unifying patterns in terms of visual continuity among ensembles of buildings and the landscape character of the streetscape.'
- (14) In short, WLEP 2000 achieved all that the proposed Design & Place SEPP has struggled to address with a clear, concise instrument at LEP level, 'a single level

document containing the integrated controls applying to each parcel of land' Untaru (2002).

(15) The WLEP 2000 model can be adapted to the 'Standard Instrument' format of LEPs in NSW with its 'streamlined' administrative features, in the following way:

- introduce fully-illustrated Locality Statements as overlays to the 'black letter law' textual conventions of NSW LEPs;
- derive the content of the Locality Statements from a place-based analysis in accordance with the Urban Design Guide and the Apartment Design Guide;
- reference the Built Form controls of the Locality Statements back to General Principles in the LEP (and SEPP/REPP controls where appropriate), and specific provisions in the DCP;
- in this way, the Locality Statements 'sit between' the LEP and DCP in terms of content but have the legislative standing of the LEP;
- in addition to a Desired Future Character Statement, SEPP/REPP/General Principles, Land Use Tables and Built Form Controls, each Locality Statement should include a Contributions Plan to replace the current weak, inconsistent combination of Section 94 Contributions and 'Voluntary' Planning Agreements with a robust, transparent system that contributes to infrastructure/community costs associated with new development.

(16) To give 'Design & Place' strength to LEPs based on comprehensive, well-founded Locality Statements, plan making in NSW needs to return to the way in which LEPs were set up under the EP & A Act in 1979, i.e. to have certainty and not be captive to special interests by being based on a formalised process of community consultation, have a 'long life' - longer than a single term of a local Council - and be made by the Minister, not the Council itself.

(17) Plan making in this way is not a matter of 'red tape' but the exercise of good government

(18) To formalise this process, the LEP should have a fixed life of seven (7) years, including a final fixed period of two (2) years in which review and revision of the instrument is undertaken through extensive community consultation to create the next seven (7) year LEP, duly signed off by the Minister.

(19) Within the 7-year period, no re-zonings should be allowed. The controls contained in the Locality Statements should be fixed for this period of time, giving clarity and certainty to citizens and the development industry.

(20) Re-zoning proposals should be ventilated, reviewed and tested through community consultation in the formal 2-year LEP revision period and be incorporated as a single set of amendments in the next 7-year LEP.

(21) Under this system, there would be no spot re-zonings, and no need for the problematic proposals of the *New Approach to Rezoning* Discussion Paper, that threaten to replace orderly processes of urban development with a continuous 'free for all' of ad hoc changes for the benefit of special interests.



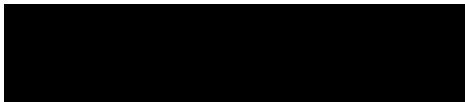
- (22) To consolidate deep understanding of 'Design & Place' in each LGA, both at community and officer level, Councils should establish Local Precinct Committees to monitor urban growth and change within each area subject to a Locality Statement (or a manageable group of areas subject to Locality Statements).
- (23) Large-scale land use changes within the 7-year life of a LEP initiated by State Government - for example, Transit Oriented Development associated with a new Metro Line - could be addressed within the State Significant Development provisions of the NSW Planning System, however, it would be preferable to bring even these changes within the community-based 2-year LEP review process as a matter of principle.
- (24) Within the 7-year life of a 'Design & Place' strengthened LEP, Development Assessment under Locality Statement provisions would have clearly demarcated objective and subjective bases: objective, with respect to evidence-based metrics; subjective with respect to design quality issues. Unlike the cumbersome, top-down 'design verification' process proposed in the draft SEPP, however, design assessment at LEP level would benefit from clear, comprehensive statements of Desired Future Character for localities well known to the assessors.
- (25) WLEP 2000 established the Desired Future Character statement as the principal control for each locality, 'setting out the place objectives and describing specific planning requirements . . . (including) the type and form of development appropriate and preferred for the locality, the preferred land uses, the required siting, pattern and scale for new development, the landscape and natural features to be protected or integrated with development . . . design guidance with respect to the visual form of future development, and controls for specific sites in each locality which . . . warrant protection or require special consideration' (Untaru, 2002).
- (26) Development Applications seeking approval with respect to a Desired Future Character statement crafted in such a clear, comprehensive way would have to present strong arguments for compliance, not a 'tick the box' proforma. With design criteria grounded in the strategic objectives and characteristics of each locality, a Design Review Panel would have a consistent, defensible basis for assessment, necessarily subjective but informed by a statutory control derived from a deep understanding of the place.
- (27) A system of 'Design & Place' strengthened LEPs could benefit from a SEPP that states broad principles, as suggested in Point (2), above, and mandates introduction of a place management approach based on rigorous, robust Locality Statements.
- (28) A blanket SEPP, as proposed in the current Consultation Draft, which attempts an all-inclusive, State-wide system, however, will overwhelm the Development Application and Assessment process with a mass of material impossible to absorb; collapse into a 'tick the box' process of no demonstrable benefit; or institute a system so subjective that anything could be possible.

For the reasons stated above, the Draft Design & Place SEPP should be withdrawn. SEPP65 should be retained in its present state, supported by the Apartment Design Guide. A system of 'Design & Place' strengthened LEPs should be made mandatory within the NSW Planning System, with clear, comprehensive Locality Statements based on equally clear, comprehensive Desired Future Character statements at its core. The Urban Design Guide should underpin the preparation of these statements, but ultimately, the place-based approach must be grounded in the conditions of specific

localities, imbued with the statutory force of a Local Environment Plan, and endorsed by the local community in its formulation and implementation.

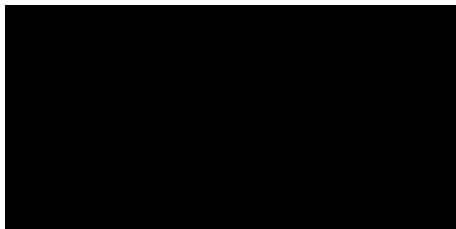
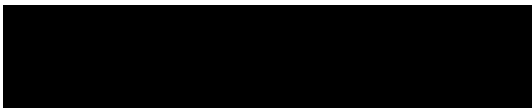
In addition, the era of 'spot re-zonings' through an endless array of Planning Proposals, must end. This has become the norm due to the weakness of LEPs as instruments in their current form detached from 'Design & Place.' The proposals advanced in the *New Approach to Rezoning* Discussion Paper must be rejected. A reformed approach to plan-making in NSW must be implemented instead, based on a 7-year span of certainty that in addition to benefiting citizens and the development industry alike. The 7-year span will also provide time for LEPs with defensible Locality Statements to be prepared, and future upzoning to be deeply considered and endorsed by the community before implementation.

Yours sincerely,




Emeritus Professor James Weirick

School of Built Environment



Reference:

Untaru, S. 2002, Place based planning for NSW local government: the Warringah Local Environment Plan 2000,' *Australian Planner*, vol.39 no.2, pp.83-89.



Submitted on Mon, 28/02/2022 - 18:28

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Diana

**Last name**

Karamacoska

**I would like my submission to remain confidential**

No

## Info

**Email**

**Suburb/Town & Postcode**

Sydney, 2000

**Please provide your view on the project**

I am just providing comments

**Submission file**

[sepp-submission\\_final\\_drkaramacoska.pdf](#)

**Submission**

28 February 2022

Submission to the New South Wales Government's Department of Planning, Industry and Environment regarding the Design and Place State Environmental Planning Policy 2021

We are an interdisciplinary team of researchers from Western Sydney University and University of Technology Sydney, and community representatives, advocating for the recognition and inclusion of age and dementia-friendly community design principles in the Design and Place State Environmental Planning Policy (DP SEPP) 2021.

Inclusive, enabling, and supportive cities are fundamental to wellbeing, especially in ageing and culturally diverse regions like South Western Sydney. Here, over 16,462 people live with dementia, and this figure will triple to 52,059 within the next 30 years unless there is a medical breakthrough<sup>1</sup>. This region is also expected to have the highest increase in dementia prevalence in all of NSW by 2050<sup>1</sup>. Many of our cities in New South Wales are grappling with an ageing population and a tsunami of dementia cases with it.

Dementia is an incurable and a terminal condition that can affect memory, behaviour, personality, vision, and mobility; disabilities that are exacerbated by socially and physically unsupportive communities<sup>2</sup>. The challenges and needs of older adults, and especially people living with dementia, continue to be inadequately considered in governmental policies. This was evidenced in our recent review of local government policies and plans across the South Western Sydney region (a project funded by Western Sydney University and Maridulu Budyari Gumal SPHERE Healthy Urban Environments Collaboratory). Our team identified that:

- Strategies for the design of accessible and inclusive indoor and outdoor environments had not been optimised for people with cognitive impairments like dementia
- Physical disabilities continue to drive action on accessibility, navigation, and wayfinding; a prevalent issue in many cities and countries<sup>2</sup>
- State government directives or policies need to lead by example and encourage local governments to effectively implement supportive and enabling initiatives that follow dementia-friendly community design principles

The DP SEPP represents as an opportunity for the state government to implement recommendations that would encourage proactive planning and action from local governments to support their ageing populations. This can be achieved by:

- Referring to, and encouraging the uptake of, the World Health Organization's Age Friendly City toolkit and/or the promotion of their six active ageing domains – namely: outdoor spaces and buildings; transport; social participation; respect and inclusion; community and health services; and housing<sup>3</sup>
- Reflecting on, and adopting, the UK's urban policies for dementia-friendly neighborhood design principles<sup>4</sup>:
  - o Familiarity through the maintenance of key landmarks and structures in cities
  - o Legibility through clear, appropriately coloured, and placed signage
  - o Distinctiveness through varied urban architecture
  - o Accessibility by ensuring primary and secondary services are within close proximity of housing
  - o Comfort by providing adequate seating and shelter in public spaces and transport areas
  - o Safety by having non-slip paths, pedestrian crossings, and floors inside facilities
- Incorporating appropriate mechanisms for consultation with, and/or representation from the dementia community and organisations that support people with dementia – such as Dementia Australia – in planning/design panels<sup>5</sup>
- Encouraging planners and alike to undertake dementia-related design training and education, as offered through Dementia Training Australia<sup>6</sup>
- Promoting and participating in multisectoral collaboration between planners, academic institutions, health care decision-makers, and advocacy groups

Government-led policy interventions are urgently needed to effectively address the health expenses and morbidity associated with dementia<sup>2</sup>. Designing urban spaces and cities that are optimised for wellbeing, ageing in place, and active living for people with dementia can have beneficial effects on the wider community. This should be a priority for all levels of government in Australia.

We would welcome the opportunity to work with the NSW Department of Planning, Industry, and Environment to optimise community wellbeing.  
Sincerely,

Dr Diana Karamacoska  
Research Support Program Fellow in Healthy Ageing and Dementia Prevention  
NICM Health Research Institute  
Western Sydney University  
Canterbury-Bankstown Dementia Alliance Member  
[REDACTED]

Professor Nicky Morrison  
Professor of Planning  
Leader of the Urban and Regional Research Program, School of Social Science  
Western Sydney University  
[REDACTED]

Associate Professor Ann Dadich  
Associate Professor of Human Resources and Management  
Deputy Director of the Consumer and Community Involvement and Knowledge Translation Strategic Platform  
School of Business  
Western Sydney University  
[REDACTED]

Associate Professor Genevieve Z Steiner-Lim  
NHMRC Emerging Leadership Fellow  
Co-Director of the Age and Ageing Clinical Academic Group, Maridulu Budyari Gumal (SPHERE)

Associate Professor Michelle DiGiacomo  
IMPACCT – Improving Palliative, Aged and Chronic Care through Clinical Research and Translation  
Faculty of Health  
University of Technology Sydney

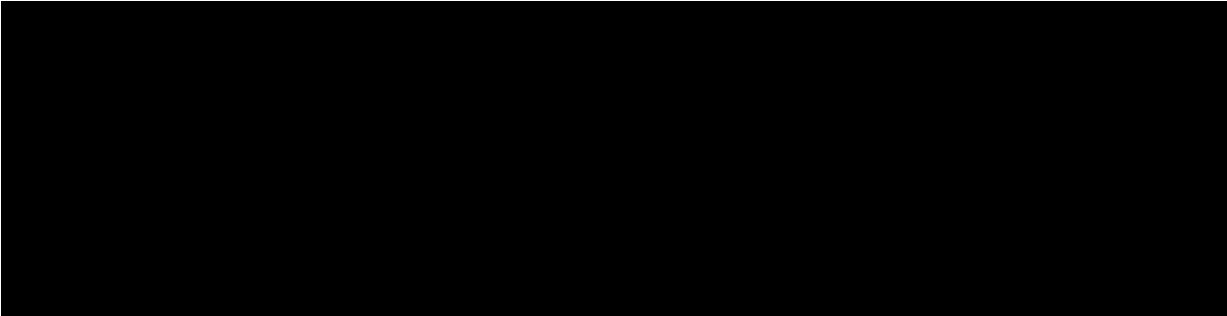
Sandra Loyola-Sandoval  
Co-Convener  
Canterbury Bankstown Dementia Alliance

#### References

1. Dementia Australia [Internet]. Dementia Prevalence in NSW by State Electoral District. Canberra, ACT: Access Economics. 2014. Available from: [https://www.dementia.org.au/sites/default/files/NSW/documents/Dementia%20Prevalence%20in%20NSW%20by%20SED\\_2016-2050.pdf](https://www.dementia.org.au/sites/default/files/NSW/documents/Dementia%20Prevalence%20in%20NSW%20by%20SED_2016-2050.pdf)
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3. World Health Organisation (2007). Global Age-friendly Cities: A Guide, WHO, Editor. 2007: Geneva, Switzerland. Available from: [https://apps.who.int/iris/bitstream/handle/10665/43755/9789241547307\\_eng.pdf;sequence=1](https://apps.who.int/iris/bitstream/handle/10665/43755/9789241547307_eng.pdf;sequence=1)
4. Mitchell, L and Burton, E (2010). Designing Dementia-Friendly Neighbourhoods: Helping People with Dementia to Get Out and About, Journal of Integrated Care, Vol. 18 Issue: 6, pp.11-18, <https://doi.org/10.5042/jic.2010.0647>
5. Creating dementia-friendly communities: a toolkit for local Government [Internet]. Australia: Dementia Australia; 2016. Available from: [www.dementia.org.au/sites/default/files/NATIONAL/documents/Dementia-friendly-communities-toolkit-for-local-government.pdf](http://www.dementia.org.au/sites/default/files/NATIONAL/documents/Dementia-friendly-communities-toolkit-for-local-government.pdf)
6. Dementia Training Australia [Internet]. Dementia-friendly environments. Available from: <https://dta.com.au/dementia-friendly-environments/>

**I agree to the above statement**

Yes



Submitted on Mon, 28/02/2022 - 18:31

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Diana

**Last name**

Karamacoska

**I would like my submission to remain confidential**

No

## Info

**Email**

**Suburb/Town & Postcode**

Sydney, 2000

**Please provide your view on the project**

I am just providing comments

**Submission**

28 February 2022

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We are an interdisciplinary team of researchers from Western Sydney University and University of Technology Sydney, and community representatives, advocating for the recognition and inclusion of age and dementia-friendly community design principles in the Design and Place State Environmental Planning Policy (DP SEPP) 2021.

Inclusive, enabling, and supportive cities are fundamental to wellbeing, especially in ageing and culturally diverse regions like South Western Sydney. Here, over 16,462 people live with dementia, and this figure will triple to 52,059 within the next 30 years unless there is a medical breakthrough<sup>1</sup>. This region is also expected to have the highest increase in dementia prevalence in all of NSW by 2050<sup>1</sup>. Many of our cities in New South Wales are grappling with an ageing population and a tsunami of dementia cases with it.

Dementia is an incurable and a terminal condition that can affect memory, behaviour, personality, vision, and mobility; disabilities that are exacerbated by socially and physically unsupportive communities<sup>2</sup>. The challenges and needs of older adults, and especially people living with dementia, continue to be inadequately considered in governmental policies. This was evidenced in our recent review of local government policies and plans across the South Western Sydney region (a project funded by Western

Sydney University and Maridulu Budyari Gumal SPHERE Healthy Urban Environments Collaboratory). Our team identified that:

- Strategies for the design of accessible and inclusive indoor and outdoor environments had not been optimised for people with cognitive impairments like dementia
- Physical disabilities continue to drive action on accessibility, navigation, and wayfinding; a prevalent issue in many cities and countries<sup>2</sup>
- State government directives or policies need to lead by example and encourage local governments to effectively implement supportive and enabling initiatives that follow dementia-friendly community design principles

The DP SEPP represents as an opportunity for the state government to implement recommendations that would encourage proactive planning and action from local governments to support their ageing populations. This can be achieved by:

- Referring to, and encouraging the uptake of, the World Health Organization's Age Friendly City toolkit and/or the promotion of their six active ageing domains – namely: outdoor spaces and buildings; transport; social participation; respect and inclusion; community and health services; and housing<sup>3</sup>

- Reflecting on, and adopting, the UK's urban policies for dementia-friendly neighborhood design principles<sup>4</sup>:

- o Familiarity through the maintenance of key landmarks and structures in cities
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- Encouraging planners and alike to undertake dementia-related design training and education, as offered through Dementia Training Australia<sup>6</sup>

- Promoting and participating in multisectoral collaboration between planners, academic institutions, health care decision-makers, and advocacy groups

Government-led policy interventions are urgently needed to effectively address the health expenses and morbidity associated with dementia<sup>2</sup>. Designing urban spaces and cities that are optimised for wellbeing, ageing in place, and active living for people with dementia can have beneficial effects on the wider community. This should be a priority for all levels of government in Australia.

We would welcome the opportunity to work with the NSW Department of Planning, Industry, and Environment to optimise community wellbeing.

Sincerely,

Dr Diana Karamacoska  
Research Support Program Fellow in Healthy Ageing and Dementia Prevention  
NICM Health Research Institute  
Western Sydney University  
Canterbury-Bankstown Dementia Alliance Member  
[REDACTED]

Professor Nicky Morrison  
Professor of Planning  
Leader of the Urban and Regional Research Program, School of Social Science  
Western Sydney University  
[REDACTED]

Associate Professor Ann Dadich  
Associate Professor of Human Resources and Management  
Deputy Director of the Consumer and Community Involvement and Knowledge Translation Strategic Platform  
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Sandra Loyola-Sandoval  
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6. Dementia Training Australia [Internet]. Dementia-friendly environments. Available from: <https://dta.com.au/dementia-friendly-environments/>

**I agree to the above statement**

Yes



Submitted on Mon, 28/02/2022 - 17:44

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## 1.1 NAME

**First name**

Nicky

**Last name**

Morrison

**I would like my submission to remain confidential**

No

## 1.2 INFO

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**Suburb/Town & Postcode**

NSW 2751

**Please provide your view on the project**

I support it

**Submission file**

[nmorrisonwsusubmissiondpsepp.pdf](#)

**Submission**

The NSW Government is taking a lead role in sustainability, with Design and Place SEPP putting sustainability, quality, beauty and vibrancy of places at the forefront of development. It also proposes that consent authorities establish Local Design Review Panels to review applicants' development proposals which need to meet key design principles. The DP SEPP recommends that a design review will be required to take place before DA lodgment, so that the panel's advice can guide design outcomes, and panels will be asked to review how the objectives have been met holistically. The design review report is to be submitted with the development application to demonstrate how the applicant has taken on board the panel's advice (NSW Government, 2021, p4 and p15).

These recommendations present a real opportunity for the NSW Government to fulfil its objective of putting sustainability considerations at the center of planning decisions and outcomes. This approach is supported by me and my interdisciplinary team of researchers at Western Sydney University. However, we suggest that much greater understanding is required in terms of how design review panels can assist in the process, before NSW Government proceeds. We have carried out extensive research, internationally, evaluating the use of Design Review Panels, drawing on exemplary case studies, and providing clear insights and lessons, which the state government could draw upon. We strongly advise that critical evidence-based research is therefore commissioned to underpin this crucial policy direction.

To highlight key challenges facing Design Review Panels internationally, I provide in the attached submission a brief summary of a

research project that I have led in my capacity as Visiting Fellow at University of Cambridge (and during my 27-year previous employment in this institution, before taking up Professor of Planning post at Western Sydney University). We would welcome the opportunity to work with the NSW Department of Planning and Environment to optimize this policy direction and make sure that the work of design review panels is put to greatest effect, instilling the need in all stakeholders to adhere to sustainability principles.

For further information contact:

Professor Nicky Morrison

Professor of Planning

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+ 

**I agree to the above statement**

Yes



Submitted on Mon, 28/02/2022 - 13:20

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

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**Last name**

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**I would like my submission to remain confidential**

No

## Info

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**Please provide your view on the project**

I am just providing comments

**Submission file**

[220228-submission\\_draft-design-and-place-sepp.pdf](#)

**Submission**

Please see attached Submission document

**I agree to the above statement**

Yes

28 February 2022

**Submission to the New South Wales Government's Department of Planning, Industry and Environment regarding the Design and Place State Environmental Planning Policy 2021**

We are an interdisciplinary team of researchers from Western Sydney University and University of Technology Sydney, and community representatives, advocating for the recognition and inclusion of age and dementia-friendly community design principles in the Design and Place State Environmental Planning Policy (DP SEPP) 2021.

Inclusive, enabling, and supportive cities are fundamental to wellbeing, especially in ageing and culturally diverse regions like South Western Sydney. Here, over 16,462 people live with dementia, and this figure will triple to 52,059 within the next 30 years unless there is a medical breakthrough<sup>1</sup>. This region is also expected to have the highest increase in dementia prevalence in all of NSW by 2050<sup>1</sup>. Many of our cities in New South Wales are grappling with an ageing population and a tsunami of dementia cases with it.

Dementia is an incurable and a terminal condition that can affect memory, behaviour, personality, vision, and mobility; disabilities that are exacerbated by socially and physically unsupportive communities<sup>2</sup>. The challenges and needs of older adults, and especially people living with dementia, continue to be inadequately considered in governmental policies. This was evidenced in our recent review of local government policies and plans across the South Western Sydney region (a project funded by Western Sydney University and [Maridulu Budyari Gumal SPHERE](#) Healthy Urban Environments Collaboratory. Our team identified that:

- Strategies for the design of accessible and inclusive indoor and outdoor environments had not been optimised for people with cognitive impairments like dementia
- Physical disabilities continue to drive action on accessibility, navigation, and wayfinding; a prevalent issue in many cities and countries<sup>2</sup>
- State government directives or policies need to lead by example and encourage local governments to effectively implement supportive and enabling initiatives that follow dementia-friendly community design principles

The DP SEPP represents as an opportunity for the state government to implement recommendations that would encourage proactive planning and action from local governments to support their ageing populations. This can be achieved by:

- Referring to, and encouraging the uptake of, the World Health Organization's Age Friendly City toolkit and/or the promotion of their six active ageing domains – namely: outdoor spaces and buildings; transport; social participation; respect and inclusion; community and health services; and housing<sup>3</sup>
- Reflecting on, and adopting, the UK's urban policies for dementia-friendly neighborhood design principles<sup>4</sup>:
  - Familiarity through the maintenance of key landmarks and structures in cities
  - Legibility through clear, appropriately coloured, and placed signage
  - Distinctiveness through varied urban architecture

- Accessibility by ensuring primary and secondary services are within close proximity of housing
- Comfort by providing adequate seating and shelter in public spaces and transport areas
- Safety by having non-slip paths, pedestrian crossings, and floors inside facilities
- Incorporating appropriate mechanisms for consultation with, and/or representation from the dementia community and organisations that support people with dementia – such as Dementia Australia – in planning/design panels<sup>5</sup>
- Encouraging planners and alike to undertake dementia-related design training and education, as offered through Dementia Training Australia<sup>6</sup>
- Promoting and participating in multisectoral collaboration between planners, academic institutions, health care decision-makers, and advocacy groups

Government-led policy interventions are urgently needed to effectively address the health expenses and morbidity associated with dementia<sup>2</sup>. Designing urban spaces and cities that are optimised for wellbeing, ageing in place, and active living for people with dementia can have beneficial effects on the wider community. This should be a priority for all levels of government in Australia.

We would welcome the opportunity to work with the NSW Department of Planning, Industry, and Environment to optimise community wellbeing.

Sincerely,

**Dr Diana Karamacoska**

Research Support Program Fellow in Healthy Ageing and Dementia Prevention  
NICM Health Research Institute  
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Canterbury-Bankstown Dementia Alliance Member



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(The below summary is drawn from publication in the journal *Planning Theory and Practice* (forthcoming))

**For further information contact:**

**Professor Nicky Morrison**

Professor of Planning  
Leader of Urban and Regional Research Program  
School of Social Sciences  
Western Sydney University



**Promoting sustainable development principles through Design Review Panels. The case of  
Cambridgeshire Quality Panel.**

**Professor Nicky Morrison**

**Design Review Panels: An International Context**

Given that the climate emergency has increased locally and globally, the notions of sustainability have moved up the public and political agenda and have led to a renewed questioning and refocusing of most professional remits. The urban design discipline has for some while been expected to play a key role in creating sustainable development and communities. The initial concept of a design review process within urban development was founded in the Netherlands, with Belgium and Germany following suit in embracing the Dutch model. Design reviews have been adopted in numerous countries thereafter, with independent expert members providing recommendations on ways to achieve higher standards of urban design.

Whilst the Netherlands set the precedence in establishing panel reviews, the Dutch exemplar fell victim to criticisms of lack of transparency and detachment from planning practices. In the US, despite their proliferation in different cities, expert panels have been criticised for basing decisions on subjective, 'vague concepts' (Punter 2011:114), and the superiority of such panels in improving design outcomes has been called into question by commentators favouring the clear measurable dimensional criteria of traditional administrative form-based codes (Farhat 2018, 2020). The work of design review panels in Canadian cities has faced similar criticisms, with notions of design considered debatable and subjective leading to arbitrary decision making. There remains no mandatory compliance to adopt a review panel's recommendations in Canada (White 2016). In Scotland, whilst it is acknowledged that design review panels offer access to expertise that otherwise would not be available in-house, the panels' role remains solely advisory (Richardson and White 2021).

Similarly in England, no legal basis for independent expert review exists. This voluntary advisory status precludes any requirement for stakeholders to heed to a panel's advice. Nonetheless, and despite these challenges, England's Nationally Planning Policy Framework (NPPF) maintains that local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development, including, design review arrangements (MHCLG, 2021, para.129). Whilst the aim of design review panels is to raise the bar on design quality of new developments, the approach adopted varies by local authority.

Previous studies examining conventional design review processes in England note their limitations for being reliant on unpaid volunteers from private and public sector professions, with no local community representatives. Their remit primarily concentrates on local aesthetics and narrowly constructed guidelines on site planning. The panels invariably examine single projects, usually without concern for their place in the urban setting or impact on the overall built or natural environment within the given local authority. Moreover, scant attention has been given to how English design review panels could be of value in instilling greater awareness among stakeholders around broader sustainability considerations and their role in promoting design-led sustainable development principles.

Various international studies, however, have highlighted the contributions that design panels in raising awareness around sustainability issues, notably the Vancouver design panel's 'comprehensive

commitment to environmental quality’ (Punter 2003:429), the call by Toronto’s design experts for the review process to ‘incorporate progressive themes such as sustainability’ (Farhat 2018:107, and White 2016), and the ‘championing’ by the Design Commission for Wales for ‘high standards of sustainability in Wales’ (Punter 2019:605).

### Our study of Cambridgeshire Design Review Panel

Our research (forthcoming in *Planning Theory and Practice*) centres on the work of the Cambridgeshire Quality Panel (CQP), which was established in 2006. Its formally approved ‘Cambridgeshire Quality Charter’ frames the CQP review process around sustainable development principles, named the 4Cs: community, connectivity, climate, and character.

Cambridgeshire has one of the fastest house building rates in England. Large-scale new settlements and urban extension developments are also being built over long periods of time. Both processes point to the paramount importance of an on-going consistency in good quality design, and in line with the Cambridgeshire Quality Charter’s agreed sustainability principles.

### The Cambridgeshire Quality Charter’s ‘4Cs’

- Building a sense of community through providing a greater choice of housing along with the active participation of people in the way their neighbourhoods are run (**Community**).
- Locating new development where they can benefit from high connectivity to jobs and services and upgrading the infrastructure to match the pace of development. (**Connectivity**).
- Tackling climate change through imaginative landscaping and innovative approaches to energy and waste (**Climate**).
- Creating places of character with distinctive neighbourhoods and a public realm that encourages people to walk and cycle (**Character**).

(Cambridgeshire Horizons 2008: 4)

The study objectives were three-fold:

- to examine how the CQP differs from conventional review panels, and gauge, from the different perspectives, the value obtained from centring the CQP review process around the ‘4Cs’,
- to ascertain how the CQP has raised stakeholders’ awareness around sustainability considerations, not just in Cambridgeshire but also elsewhere, including nationally, and,
- to consider the limitations of the CQP within the current design governance system that it operates within.

### What did our study find?

Establishing a design review panel offers access to expertise that is otherwise unavailable to local planning officers. The importance of promoting high quality design standards at the earliest opportunity is key. Such promotion needs to take place throughout the project evolution process, and the delivery stage. It also requires interdisciplinary and experienced panellists dedicating time and effort, and willingness by local planning officers, elected councillors, and applicants to engage in what can be a demanding process. Setting out the agreed principles and by reviewing schemes early on, design review panels can provide the necessary support to local authorities at a time when they have access to ever fewer resources.

The key aim is to schedule the first meeting between the design review panel and applicants before the initial planning application. It is also important to review the scheme again prior to subsequent stages (the Design Code, and Reserved Matters stages). By dedicating time to this engagement process, the panellists build up a collective knowledge base, providing local planning officers with support and reassurance *‘to boost their legitimacy, because it allows them to demand more and stops developers ruining new developments with ill-conceived plans’* (CQP member). As one planning officer added: *‘the calibre of the people on the panel gives it the weight its needs’*, and even though the panel’s role is solely advisory, *‘it can still influence the process and development outcome’*. If the developer does not show any sign of implementing the panel’s recommendations, it is likely that the local councillors could take this as a reason to refuse planning permission.

Significantly, unlike conventional review processes in England, the CQP structures its review process around the Charter’s ‘4Cs’. Applicants are required to prepare a presentation to the CQP and planning officers, referring to each of the Charter’s ‘4 Cs’.

### Cambridgeshire Quality Charter’s ‘4Cs’ Applicant checklist

#### 1. Community

- Community involvement in the process
- Allowing for changes in needs and lifestyles
- Active management of the new communities
- Provision of social infrastructure – health, education and leisure etc.
- Provision of Green Spaces
- Management of Green Spaces
- Provision of Community Development support
- Quality of community buildings
- Availability of local shops and services

#### 2.Connectivity

- Early provision of public transport
- Well integrated public transport
- Good links to local employment locations
- Contribution to wider environmental goals (e.g. working from home)
- User hierarchy giving primacy to walking, cycling and public transport
- Easy mobility for all
- Well designed bus stops
- Management of car parking
- High quality road design



#### 1. Climate

- Encouragement of 'sustainable lifestyles'
- Meeting challenging environmental standards
- Avoidance of environmental risks e.g. flooding
- Sustainable waste management
- Promotion of energy and water conservation
- Adapting to climate change
- Provision of Sustainable Urban Drainage Systems
- Provision of Sustainable Energy Partnerships
- Provision of tree planting

#### 4.Character

- Using existing landform to create memorable places
- Agreeing an overriding master plan
- Retaining the master planners to ensure original vision is maintained
- Provision of full range of house types
- Simple house designs using high quality materials
- High quality private open space – gardens, balconies and terraces
- Good integration of landscape with townscape
- Flexible and adaptable design in all buildings
- Well integrated parking for cars and bicycles and well designed waste recycling

(source: Cambridgeshire Horizons 2008)

The CQP's distinct approach provides an opportunity to move discussions beyond local aesthetics and built form into wider issues of sustainability considerations. By moving discussions away from a preoccupation narrowly constructed guidelines and adopting a more comprehensive approach to place-making, the panel not only makes recommendations on the quality of proposed schemes but instils in stakeholders the need to adhere to sustainable development principles as a fundamental criterion.

*It is about changing expectations right at the outset through establishing a Quality Charter framed around the '4 Cs'. Change comes in many ways and changing mind-sets is key, so that poorly thought-out plans never materialise (CQP member)*

#### Demonstrable impact

Overall, nearly 200 schemes across Cambridgeshire have undergone the rigorous CQP review process, with 24 winning prestigious National Design Awards, which is more awards than all the major English cities, apart from London to date.

Moreover, the CQP's spectrum of activities extend well beyond its remit, including educational workshops, roundtable discussions, site visit tours, advice to other panels across the country, playing an influential role in shaping planning and development industry culture.

The CQP has also stimulated the UK government's debate around revising design review methodologies and including in such review's greater awareness around sustainability considerations. The UK Ministry of Housing, Communities and Local Government (MHLCG) National Design Guidance (2019) is now framed around three of the CQP's '4 Cs', namely community, character and climate (para. 36). Drawing

on CQP advice, the MHLGC has also identified how the 'Climate Emergency' could play a more central role in the UK government's new Planning White Paper (UK Parliament 2021).

#### The Challenges

Despite well intended motivations for planning authorities to engage in and establish design governance arrangements, the design review process, as with urban design generally, can be inherently problematic; not the least because at its heart is the idea of complex shared responsibilities. For Carmona (2016), balancing certainty and consistency with flexibility is the key challenge in all design governance. Further challenges centre on fragmented responsibility among the numerous professional specialisms, preventing coordinated action to deliver sustainable development principles at the site level. The lingering dissensus remains between public and private interests, subjectivities in determining what in fact merits high sustainability standards, concerns around the apparent arbitrariness around the review panel's recommendations and lack of community input in the design review discussions.

Whilst non-regulatory tools are of value within a design governance framework, there remains, however, fundamental limitations to what design review panels can achieve, to date. Independent panel members cannot insist on matters those developers are not legally obliged to realise. Without such authority, developers cannot be compelled to revise their development proposals to address panel recommendations.

Difficulty remains in making developers take suggestions on board because of their focus on economic viability, cost, and profit. When a developer plans to acquire and develop a site, they need to have an assurance about how much it will cost them. If developers think that the review is going to make for a more efficient scheme or more profit or a better place and then more profit, then they will be more willing to engage. Yet while developers often hire renowned architects who would develop the design concept to high sustainability standards, after the review process they invariably continue with their cheaper in-house team, thereby tempering the original architects' ideas.

Crucially, developers know that they can justify their proposed scheme in front of the planning officers and councillors at a further (Reserved Matters) stage, without the CQP in attendance. The influence of the design review panel is thereby marginalised, and opportunity is provided for negotiations to happen behind closed doors.

In England, for example, while the National Planning Policy Framework encourages the use of design review panels, it also provides economic viability grounds for developers to overturn planning officers' decisions and panel recommendations. These contradictory revisions in effect constitute a developer charter and assist a UK Government intent to speed up housing delivery. Yet this status quo is retained at the expense of (perhaps more costly) high sustainability standards. As in other countries, continual demands to accelerate the development approval process work against achieving high quality design, despite being encouraged by well-intended design review principles and processes.

## Way Ahead

The CQP sums-up their reservations in their ability to instill the urgent need to adhere to sustainable development principles.

The panel has considerable expertise in the area of climate change but how do we follow this through with the house builders with sufficient speed to effect the necessary change? (p.4). .... Platitudes are regularly offered but where are the planning policies with teeth and mechanisms to insist on preparation for future climate adaptations? Will the Councils set higher standards (CQP Annual Report 2019, p.5).

Ultimately, political will and long-term investment decisions will determine where sustainable development ranks on public, private and political agendas. Further research is therefore needed to focus on ways to overcome the challenges of design governance processes, of which the design review process forms part, and to continue to collectively make the case as to why sustainability matters.

Whilst there are acknowledged, inherent difficulties in measuring design review panels' impact on the ground, this challenge does not negate the need for in-depth, longitudinal research, and to further shine a critical light on the role of design review panels in promoting sustainable development principles, not just in one case study location, but also nationally and internationally.

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