4 January 2017

Building Policy Branch
SA Department of Planning, Transport and Infrastructure
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Re: SA Minister’s Code: Upgrading health and safety in existing buildings (draft), November 2016

Thank you for the opportunity to comment on this proposal. I provide this letter as a submission on behalf of Australia ICOMOS.

ICOMOS – the International Council for Monuments and Sites – is a non-government, professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention.

Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 600 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia.

We understand that the draft Ministers Code, Upgrading health and safety in buildings is intended to provide clarification of the extent of upgrade work required to an existing building, when triggered by the Development Act 1993. The Code may apply in situations where existing buildings are being altered or reclassified, or where a building is found to be in an unhealthy, unsound or unsafe condition. The Code also allows for some concessions to apply, depending on the building’s circumstances.

The Code generally provides opportunities for consideration of alternative ‘deemed to satisfy’ design solutions in the compliant refurbishment of existing buildings. This mechanism is supported, as alternative solutions allow retention of heritage fabric of significance while still delivering compliant building spaces in existing heritage listed buildings. If heritage buildings continue to be occupied and used, they are also maintained and their public value is enhanced.

Clauses 402.13 (1) and 104.5 and also Table 102-1 note that the Building Certifier would be required to determine “the extent to which the heritage features of the building are essential, or merely incidental, to the heritage significance of the building.” We strongly advise that a Building Certifier may not be the most appropriate professional to determine heritage significance. We recommend that Certifiers seek the opinion of a suitably qualified heritage professional to assist with the determination of heritage significance of a building. In Australia, heritage professionals have undertaken appropriate training and have extensive professional experience in heritage assessment matters and are best placed to advise on the management of change to heritage places.

We thank you for the opportunity to provide comment on the proposed draft Minister’s Code – Upgrading health and safety in existing buildings.

Yours faithfully

MR IAN TRAVERS
President, Australia ICOMOS