South Australia’s Planning Reform – Public Consultation

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To whom it may concern

REVIEW OF SOUTH AUSTRALIA’S PLANNING SYSTEM

Please find below a submission from Australia ICOMOS commenting on the current South Australia’s Planning Reform. We note there is the opportunity to participate in workshops in August and September on this proposed Reform.

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. Our organisation was formed in 1965, and among other duties has a responsibility to advise UNESCO in the assessment of sites proposed for the World Heritage List. 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 and is managed by an Executive Committee of 15 people, elected from the membership. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia. Australia ICOMOS currently has a number of key members on our Executive Committee based in Adelaide, with a large and active membership base. Australia ICOMOS seeks to be a strong advocate for best practice approaches in heritage protection and management.

We have noted with some concern the general weakening of heritage protection in South Australia’s approach to planning, and consider that heritage character is one of the key attributes of this State. The point of difference in Adelaide and South Australia is our quality of life and retention of heritage places and we would like to see this emphasised in the Planning Reform as a key objective: the protection of our built, natural and Cultural Heritage.

Thank you for the opportunity to participate in this important process. We would also welcome the opportunity to work with the State Government further in any further consultation and/or reviews with regard to the above.

Yours Sincerely,

ELIZABETH VINES OAM
President, Australia ICOMOS
This submission by Australia ICOMOS (International Council on Monuments and Sites) is in response to the preliminary information that has been released for public comment on South Australia's Planning Reform.

We have noted with some concern the general weakening of heritage protection in South Australia’s approach to planning, and consider that heritage character is one of the key attributes of this State. The point of difference in Adelaide and South Australia is our respect for our history, the retention of heritage places and resultant quality of life and we would like to see. This emphasised in the Planning Reform as a key objective: the protection of our natural, cultural and particularly our built Heritage.

Particular concerns of Australia ICOMOS are as follows:

- Under the “Design Thinking” section of the preliminary information, there is no mention of heritage, only streetscape, and it is important that protection of identified heritage places and heritage character is a key consideration.

- The ongoing need to identify areas of heritage character through the Development Plan Amendment Process. Currently there are councils whose proposed Historic (Conservation) Zone identifications are not being processed, due to perceived “lack of development opportunity” where in the past these have been shown to be effective mechanisms for retaining a strong sense of place, at the same time allowing appropriate development. Historic Conservation Zones/Areas provide developmental certainty for owners, while maintaining heritage character for the community.

- Development adjacent to heritage places which ignore to the historic context of the development site and the need to respect the existing identified heritage place. A current example of this is the proposed Palladium Development in Light Square. The proposed apartment tower sits over the top and in the former City Mission Hall, at 69 Light Square, and is adjacent to two other State Heritage buildings. Australia ICOMOS recommends that Councils such as the Adelaide City Council consider the acknowledged principles and processes for heritage identification and management as identified in the Australia ICOMOS Burra Charter within the planning process to ensure that the values of such places are not diminished by out of scale new development.

- The ignoring of height limits within existing Development Plans in order to encourage development and facilitate easy approvals, at the expense of the amenity and context of the proposed development

Australia ICOMOS appreciates the opportunity to provide comment on this important reform. However, we would add that caution needs to be applied to ensure that the positive aspects of legislative change in in the planning process are adopted, not the elements that favour development at the loss of our important built heritage.

Yours faithfully

MS ELIZABETH VINES OAM, FRAIA
President, Australia ICOMOS