15 July 2015

Dear Sir or Madam,

ADELAIDE PARK LANDS ZONE DEVELOPMENT PLAN AMENDMENT

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 have a particular interest in Australia’s world heritage sites.

Noting the very broad definition of ‘public infrastructure’ projects as defined in Section 49 of the Development Act 1993, Australia ICOMOS is concerned about the State Government’s proposal, contained within the Adelaide Park Lands Zone of the Adelaide (City) Development Plan, to rezone significant sections of the National Heritage listed place ‘The Adelaide Park Lands and City Layout’ in order to enable such broadly defined projects to be assessed ‘on merit’ instead of as non-complying development.

Australia ICOMOS believes the re-zoning could undermine the intent of the Adelaide Park Lands Act and the Environmental Protection and Biodiversity Act’s recognition of the Adelaide Park Lands as a site of National Environmental Significance.

Australia ICOMOS recognises that the provision of public infrastructure is critical to the ongoing needs of the City of Adelaide. However, we note that there are processes in place for assessing and approving non-complying development, and we believe that these processes are more transparent and therefore more appropriate for considering development that may impact on this highly sensitive and nationally significant cultural landscape.

We therefore do not support the proposed Development Plan Amendment, and instead recommend that any proposals for ‘public infrastructure’ in the zone continue to be assessed as non-complying development.

Thank you again for your consideration of the views of Australia ICOMOS in this important issue.

Yours faithfully


MS ELIZABETH VINES OAM, FRAIA, MICOMOS
President, Australia ICOMOS