3 November 2015

The Hon John Rau, Minister for Planning
GPO Box 464
Adelaide SA 5001

By email: agd@agd.sa.gov.au

Dear Minister Rau,

PROPOSED NORTH ADELAIDE DEVELOPMENT PLAN AMENDMENTS (DPA)

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.

Australia ICOMOS is concerned that proposed changes to the North Adelaide Development Plan would erode the important heritage values of North Adelaide that have been carefully managed through previous provisions of the Development Plan over time.

The key concern is new allowances for greater height within the policy areas occupied by the various institutions. This appears to be in response to the requirements of the expansion of these institutions. In addition, amendments to plot ratio, where the need to have regard to the stated plot ratios is now deleted, would likely lead to weakened character protection.

The intent to introduce new land uses into a Historic Conservation Zone (HCZ) requires detailed explanation and again appears to focus on greater development intensity within the Zone, which is of concern to us.

We are also concerned about incompatibility of objectives within Policy Areas with the anticipated developments. An example is in the Hill Street Policy Area 1, where the Desired Character statements note that it “should remain one of the lowest density residential areas in Upper North Adelaide and should be protected and enhanced as one of the most historically intact residential areas in South Australia.” However, there are new developments anticipated in this Policy area that propose expansions for St Dominics; the Helping Hand; and Calvary Hospital (with proposed multi-storey car park), which are all incompatible with this Desired Character and the existing Objectives.

It is also of concern to us that the February DPA stated: “All sites need to respond to the surrounding context and heritage value of the area. The existing policy areas provide the contextual information to ensure development responds to its locality.” In the August 2015 edition this second sentence has been deleted, which may be tied to the fact that proposed development can not respond when such density and built form increases are proposed.
The proposal for a new policy area No 13 appears to have been created to allow for the master planning for the Australian Lutheran College. The new Desired Character and Objectives statements strongly contrast those of the remainder of the other policy areas of the HCZ development plan and allow for much higher density to be implemented. Plot ratio (basic and maximum) have been eliminated.

North Adelaide as a suburb of Adelaide is very important to the cultural significance of the City, being part of Light’s original plan. It has long been held as a “jewel” area, visited by many, and appreciated by local residents. High property prices reflect its treasured character and inner city location. It is imperative that this character is not undermined by inappropriate new development that would destroy the significance of the locality.

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

Yours faithfully

[Signature]

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

CC: Adelaide City Council