



Gawler Environment and Heritage Association Inc.

Email: [REDACTED]

Tel: 08 8522 4363 C/- [REDACTED] Gawler SA 5118



27 February 2020

Chair, State Planning Commission
Adelaide

Dear Chair

Planning and Design Code – Historic Areas, draft Code

Gawler Environment and Heritage Association (GEHA) is a community group which supports the heritage of Gawler and our region as well as natural environment and biodiversity and environmentally sustainable living. GEHA has been in operation since 1980. Over the last 40 years we have been keen for Gawler to retain its place as a town with high quality built character. Our members own many historic houses in the local area and have supported many activities over the years to support and promote the historic places and character of Gawler.

We are very concerned about the potential effect of suggested changes to protection of heritage places in Gawler and elsewhere in the State and generally the proposed new building code.

We generally support the extensive submissions that have been put together by National Trust of South Australia, Conservation Council of South Australia, Environment Defenders Office, Community Alliance and Protect Our Heritage Alliance

Gawler Council is one of the areas most affected by changes which are attempting to put identical policies in place across the state.

Many local Councils including Gawler have expressed objections to the process to date. Having a simplified system and a single template across the state may suit developers but poses threats for heritage protection and good local planning in many cases.

Given that the Property Council of SA has been the chief proponent of the heritage changes it is likely that changes will weaken heritage protections when better protection is needed given experience over the last 30 years (despite all the marketing words surrounding the changes in government documents).

Experience with planning processes is that most of the input is from self-interested developers and their consultants. Unless councils spend money to test reports about the cost of repairs of buildings, the state of buildings etc then reports which often lack credibility tend to be accepted. There needs to be much higher onus on developers to prove their case. Saying that owners should not benefit from neglecting their buildings is not much help unless there are some serious obligations involved. *"It is not intended that PO6.1 serve building owners who deliberately neglect their premises in order for them to fall into uneconomic disrepair to enable demolition under this*

provision.” How to deal with an owner who simply neglected rather than deliberately neglected? An owner just states that money was not available to do repairs. What happens when ownership change occurs – start again won’t work? There should be appropriate stewardship obligations on owners, particularly owners buying in after heritage rules have been in place in a council area.

Much more time is needed to allow ordinary people to understand the changes proposed. Given that council and others have pointed out major problems with the very complex documentation presented for comment, it makes it very hard and potentially unfair to expect comment on documents which are very difficult to assess and quite likely to change significantly. As recorded by some other responsible organisations, we support an extension of time to consider the proposals in the order of 2 years to ensure that there is full and careful assessment of changes.

Thank you for the opportunity to comment. We look forward to further commentary when a better process of understanding the suggested changes has been put in place.

Yours faithfully

David Ferguson, Convenor