

From: [Pauline Payne](#)
To: [DPTI:Planning Reform Submissions](#)
Subject: submission on the Planning and Design code
Date: Friday, 28 February 2020 3:35:58 PM
Attachments: [Prospect heritage issues submission.docx](#)

I am most concerned about the current situation regarding planning and design issues and am attaching a submission, with best wishes, Dr Pauline Payne

28 February 2020

SUBMISSION TO PUBLIC CONSULTATION ON PLANNING AND DESIGN CODE - PHASE 3

As a Historical Consultant with heritage work experience, a member of the Professional Historians Association, a Visiting Research Fellow in the Department of History, University of Adelaide (with teaching experience in the School of Architecture and Landscape Design) and a resident of North Adelaide working with colleagues in the City of Prospect on a local history project, I am most concerned that the following matters to be considered:

1. State heritage provisions for areas and places should be 'carried over' into the Code.
2. Detailed heritage guidelines should be provided to councils processing minor development applications under delegation from the Minister of Environment and Water.
3. Historic Area Statements (issued on the 23rd December 2019) are integral to identification of all related , heritage. These need to identify current existing contributory buildings in line with recognition of the distinct and important historic characteristics of individual areas. The Historic Area Statements are deficient as follows:
 - The template approach lacks key aspects of historic patterns and characteristics. It is essential to cover the context of history and evolution of the heritage area.
 - Existing building siting criteria (road setback, side boundary and total building spacing has been replaced by minimal generic setbacks criteria in the Code).
 - Historic Area Overlay policy lacks guidance on improvement that respect buildings and does not provide reasonable demolition protection.
 - Historic character includes the original whole building, setting and context - not just the building façade.
4. Contributory Items - a significant number that includes approximately 12,000 contributory items across Adelaide these represent 3% of total housing stock in metropolitan Adelaide - need to be recognised as desirable assets that can adapted to the modern day living/ commercial use. These form a highly desirable part of our state's heritage resource.

The Planning Commission needs to prioritise protection of these important elements of past and present environments and protect them from demolition and unsympathetic replacement development. Heritage is an irreplaceable resource if demolished by those who profit from higher density development.
5. I support the submission by Vines & McDougall [colleagues with whom I have had professional contact] including:
 - 5.1 Contributory places need to be in a clearly identified database (e.g. spatially identified on a map showing the newly termed Historic Areas boundaries or by address) with carry over policies and content to provide clear guides for future development of heritage assets. Local and state heritage places within the Character Overlay must be identified and referred to in mapping.
 - 5.2 The draft Historic Area Statements should be completely redrafted, edited and rewritten by experienced heritage consultants to expand the content, incorporate necessary additional information, and provide a statement to guide appropriate development in these significant historic areas. In their current form, development could be approved which would destroy the historic values of a Historic Area Overlay.

6. I support the removal by the Planning Commission of the current legal requirement of 51% approval by all land owners in an area proposed for heritage zoning (and/or overlay).
7. Recognising that adjacency situations vary considerably in different areas of our state, I support recommendations that council planners and heritage architects assist DPTI in formulating heritage adjacency content draft policies that will clarify desired outcomes and DTS provisions. Local councils should continue to have a major role in planning and management of Character Areas, local heritage places and Historic Areas using local knowledge and expertise. Local councils should not have extra constraints and expense place on them by the State Government and its instrument, the Planning Commission.
8. Character Overlay Assessment Provisions (relating to streetscape amenity and development that complement a defined streetscape character) need to be strengthened so that new development demonstrates any prevailing characteristics of the area. Public notification should be included under Procedural Matters to enable better assessment outcomes.
9. Demolition of well-built homes of traditional architecture, together with all its vegetation, needs to be stopped from becoming the norm. The dwelling styles within Inner Metropolitan Adelaide are distinctive at a national and international level in consistency and character in many areas. This must be recognized and addressed in the Planning and Design Code. Generally our communities of the inner and middle ring suburbs within 10 kilometres of the CBD expect existing character to be maintained with sensitive infill acceptable where suitable design and streetscape integration are demonstrated. This must be recognized in the Planning and Development Code. The Code policy does not address the retention of local residential character balanced with sensitive and appropriate infill development to a sufficient level of detail.
10. National Heritage Places such as the Adelaide Park Lands and City Layout should be identified in South Australia's planning system and heritage data bases.
11. Further consultation is required and date for the current consultation needs to extended.
12. I would like further community consultation once the Code's errors have been corrected and the draft updated.

Yours Sincerely,
Dr Pauline Payne

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