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RE: DRAFT STATE PLANNING POLICIES (SPPS)

The National Trust of South Australia (NTSA) is the State's leading non-government heritage conservation organisation, with more than 6 000 members and volunteers across the State. For 60 years the Trust has played a leading role in preserving South Australia's heritage. It manages 130 built and natural heritage places across the State and has, in the past three years, raised more than \$2.5m for heritage conservation projects in South Australia through the South Australian Heritage Foundation. The NTSA plays a valuable role in property management, community engagement, fundraising and skills training.

The NTSA welcomes the opportunity to provide comment on several of the draft SPPs. As a preliminary matter we note they have objectives and policies. This is somewhat confusing as section 61 of the *Planning, Development and Infrastructure Act 2016* refers to policies and principles. Perhaps there should be objectives, principles and sub policies?

SPP3: ADAPTIVE RE-USE

The NTSA supports in general the content of this draft policy, however in our view the objective should state that adaptive re use must preserve where applicable the heritage values of a property.

The social, cultural, economic and environmental benefits of adaptive re use could be spelt out in more detail. Most historic buildings are fully capable of economic use and studies have shown that the return on heritage listed properties compares favourably with the return on unlisted properties.¹ Maintaining, upgrading and adaptive reuse of heritage items is an important driver of public and private sector investment which in turn has significant economic benefits. Expenditure is paid into the local economy, while the situation for new construction is generally the reverse. Important parts of the economy- professional services and the creative and cultural sectors often seek to locate businesses in heritage buildings. Such small businesses are typically innovators and provide a core for other larger businesses.

Urban regeneration leads to economic opportunities for many businesses including in the services, construction and design sectors. The net overall construction cost can be considerably less partly because through the use of local rather than imported goods and cost savings through value being placed in the existing fabric, rather than just in land alone. This value is both in floor space that can be used without new construction and in the existing fabric itself which can be borrowed from, and integrated into a conservation project. This in turn can increase the real end value of the project. Many historic buildings are structurally sound and well built. They may require structural retrofits or the addition of fire sprinklers and other equipment to enhance their safety, but older buildings are often significantly better constructed than some more contemporary ones.

Finally, we suggest the inclusion of a policy that adaptive reuse proposals concerning heritage properties be undertaken in a manner consistent with the guidelines contained in the Burra Charter. This would give certainty and transparency to the overall process.

SPP7: CULTURAL HERITAGE

As the concept of heritage has broadened to include precincts and areas, so the relationship between heritage and planning has become more critical. Planning strategies and policies developed in isolation from heritage run the risk of placing

¹ Eg English Heritage *Power of Place* 1998

valued areas and precincts at risk. We need an integrated approach to heritage protection and strong consistent policies.

In the interests of fairness and equity in decision making it is vital that the new PDC contains comprehensive heritage policies and explicitly recognises the heritage significance of all currently listed matters via a heritage overlay. In this way decision makers are required to consider the significance of the place, any applicable heritage study or conservation policy, and the impact of proposed building, alterations, works, subdivision, consolidation, signage and the like on significance, character or appearance of the heritage place. This includes the compatibility of development adjacent to and in areas of cultural significance, for example the ring of suburbs surrounding the city centre.

The current draft policies are vague, unclear and underdeveloped. For example does places include built heritage? Whilst they refer to supporting and promoting, recognising and protecting heritage there is no guidance as to how. This policy should identify cultural heritage as community assets to be understood, cherished and celebrated, something that is valued enough today to leave for future generations and should not be regarded as expendable if a sufficient case can be made. Value can be defined economically and in terms of social, cultural and environmental benefits. South Australians feel a strong connection with our local areas, environment and cultural traditions and understand that the presence and conservation of our heritage is an important part of our sense of identity and lifestyle. The Expert Panel established to undertake the review of the South Australian planning system reported in 2014 that *"The panel's engagement with communities across the state revealed a deep and abiding awareness of and pride in the heritage of South Australia's buildings, landmarks and landscapes."*²

One suggestion is that Policy 2 refer to indigenous and non-indigenous cultural heritage sites and areas of significance. Furthermore Policy 1 could include the phrase "where appropriate". Although the overwhelming majority of listed historic heritage places are intact buildings that remain in use, there are also vacant buildings in remote areas,

² Expert Panel on Planning Reform –Our Ideas for Reform Report 2014

remnants of former mining and other defunct industrial activity scattered across the landscape and large industrial structures that are beyond practical physical conservation. There are other ways to conserve historic heritage other than restoring or reconstructing them to an intact state such as allowing places to become ruins within the landscape, or recording them in archives before they are demolished.

Please contact the writer should you wish to discuss any aspect of this submission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Darren', written in a cursive style.

**Dr Darren Peacock
Chief Executive Officer
National Trust of South Australia**