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Cr Christel L Mex
Kensington/East Norwood Ward
City of Norwood, Payneham & St Peters
PO Box 685
Kensington Park 5068
Email: [REDACTED]

Mr Tim Anderson QC
Chair, State Planning Commission
DPTI.PlanningEngagement@sa.gov.au

RE: SUBMISSION TO DRAFT PLANNING POLICIES

Dear Sir,

Thank you for the opportunity to provide a submission regarding the draft State Planning Policies. As the mover of my Council's formal submission to the process, I support the points raised in their submission and in addition, provide my personal submission below.

State Planning Policy 1: Integrated Planning

In the diagram of areas depicted on page 21 which includes illustrations, there is no mention of Historic Conservation Zones and a total lack of recognition of unique character areas across the inner suburbs. All the messages are about infill without any counter-balancing with the important aspects of built and cultural heritage. ***I recommend rectifying this diagram.***

In the 'non-statutory guidance notes', it is stated that 'existing patterns of growth and areas that need careful management will be required in Regional Plans. ***If that is the intention, then it should be specifically mentioned as a policy in this section, and include the recognition of Historic Conservation Zones.*** They are a legitimate part of the planning system, as are desired character statements which are the most useful part of the assessment of new developments in Historic Conservation Zones. These zones exist in many parts of South Australia and are *not* just local issues as they are well described and defined under State policy in the Heritage Bulletin (2001) which was never retracted.

State Planning Policy 2: Design Quality

In Policy 7, it is unclear whether this pertains only to Adelaide City or throughout the state. Why should good design quality outcomes just be limited to on City? ***I recommend expanding this statement to make it clear that it applies to all cities and towns.***

State Planning Policy 6: Housing Supply and Diversity

Policy No. 5 in this section refers to providing a 'permissive and enabling policy environment for housing within residential zones, including the provision of small lot housing and aged care accommodation'. I strongly disagree with the use of the phrase 'permissive and enabling' as it sends the message that local development plans and the preservation of Historic Conservation Zones can be easily ignored. Planning is about the common good and giving people certainty

that when they invest in a residential area, they know that everyone will follow the same rules (unlike the LifeCare example). **Consider replacing 'permissive and enabling' with 'a clear and certain policy environment'.**

I also recommend adding a policy in this area such as, "Support the conservation of valued built form character through tailored Historic Conservation Zone policies and character areas". This would give some comfort for citizens who live and have invested in these zones.

State Planning Policy 7: Cultural Heritage

I strongly advocate for recognition of Historic Conservation Zones and Contributory Items in the Cultural Heritage policy area. They are an integral part of state planning policy and not just a local issue as pointed out earlier in this submission.

The zones were established to preserve our historic streetscapes and villages for future generations. The zones include many heritage residences and businesses that embody the character of South Australia, and when maintained as a collection, create a beautiful amenity for all citizens to enjoy. The zones can be found in our country town high streets, inner-city hotspots and residential neighbourhoods.

If they are not specifically mentioned in the policies, one could only logically conclude that they will disappear in the absence of any policy clarity and become areas targeted for infill development.

- If the zones are withdrawn from the planning system, contributory items are at risk of demolition. In their place will be new houses that under the new planning system will allow for a tick-box system of approvals and private certifiers.
- Currently, most houses in Historic Conservation Zones are called Contributory Items. Policy controls in Council development plans protect against their demolition but allow non-contributory items to be replaced with dwellings that complement the streetscape. If the historic zones disappear, there is a risk that these new dwellings will look out of place and ruin the historic character of these zones forever. There will be bigger houses covering most of the allotments, more pavement, less garden area, and less biodiversity for our native animals and birds.
- Most of South Australia is already zoned residential, which allows for all types of dwellings to be accommodated. Low-density and low-rise development, which characterises Historic Conservation Zones, is entirely excluded in the State planning policies' definition of inner suburbs. This is another clue that indicates that Heritage Conservation Zones will be excluded from established suburbs including Unley, Norwood, Prospect, Mile End, Thebarton, Port Adelaide and Mitcham Village.

My residents, at least those who are aware of the draft policies, are alarmed that the important recognition of local historic character is not mentioned in the State Planning Policies. They are also extremely worried by statements that refer to current policy controls which are "unique" to a local area will not be able to be carried over into the new Planning and Design Code. The policies should recognise the importance of listings at all levels of State Heritage, Local Heritage and those buildings currently protected as Contributory Items, combined with appropriate levels of policy protection at each level in the new Planning and Design Code.

The policy area of Cultural Heritage is extremely weak compared to other policy areas. Whilst the 'non-statutory guidance notes' provide some mention of places of significance, they still exclude any mention of Historic Conservation Zones and Contributory items.

I recommend addition another policy to this area such as, "Support built form heritage through the transition of all State and Local Heritage Places and local policy for Historic Conservation Zones, including contributory items, and areas of valued built form character."

Whilst the issue of Historic Conservation Zones may be raised in the upcoming discussion papers, the policies as they currently stand give no comfort that this will happen. It may be too late to give Historic Conservation Zones the protection they deserve if the State Planning Policies are adopted in their current form.

It is extremely unfortunate that consultation on these policies closed before all the discussion papers were released. The order of this entire process should have started with the discussion papers, then state policies, regional plans, sub-regional plans, the design code and finally the portal. I believe that this reform process needs more time to allow for proper consideration of all the issues, in a sensible and orderly fashion, with genuine community consultation at its heart.

Yours sincerely,

Cr Christel L Mex

cc: The Premier, Minister of Planning, SA Heritage Council, History Trust of SA, State Planning Commission, National Trust of SA, Environmental Defenders Office, National Trust of SA, Norwood Residents Association, Kensington Residents Association.