

From: Liz [REDACTED]
Sent: Thursday, 5 December 2019 5:06 PM
To: DPTI:Planning Reform
Subject: FEEDBACK ON HISTORIC AREA STATEMENTS

TO WHOM IT MAY CONCERN - EXTENDED TIME FRAME FOR CONSULTATION - PHASE 2

I would like to provide feedback on the following –

To support the introduction of the Historic Area Overlay, Historic Area Statements are proposed to be included in the Code to help clearly identify and articulate key elements of local importance. Historic Area Statements for the Phase Two draft Code were made available on the SA Planning Portal on 4 November 2019 as part of the Phase Two public consultation. In response to feedback the date for submissions relating to these Statements has been extended to 6 December 2019. Submissions can be lodged via the SA Planning Portal. Details for the submission process are available on the SA Planning Portal.

The statements provided for Phase 2 are **ENTIRELY INADEQUATE** and remove many of the fine grain principles which now exist in Development Plans. An example is Robe - a half page of generic statements with a half page table which has no headings, replaces 5 pages of carefully considered provisions for the protection of Robes historic character. If a building is not 19th century or single storey it will not be protected! The historic character of Robe will be destroyed if these are the statements being relied upon to control development.

Auburn has similarity inadequate provisions in the statement which will **NOT PROTECT** the historic character of Auburn. If a building has no verandah and is built in the 20th century it will not be protected. There are many important buildings in Auburn with no verandahs, and built later than 1900. This will not provide any sensible guidance to controlling heritage protection or management. In Penola, the statement is totally inadequate. A Heritage Survey was undertaken for Penola in 2009 which outlined very detailed policies and character descriptions, and these should be included in the Historic Area Statements. The incomplete and inadequate table for Penola, and the lack of scheduling of contributory items will allow the destruction of local heritage character and provide no guidance at all for local government .

THESE NEED TO BE REWRITTEN BY HERITAGE PROFESSIONALS OR PLANNERS who understand the importance of these statements and include information from the existing Development Plans and heritage surveys which have been prepared by Local Government. Like the rest of the Code, we need to get this right, NOT RUSH IT through.

So I recommend - TAKE MORE TIME with these statements, and get them right.

And allow for the transition of the schedules of contributory items into the new code (into the Sub Zone provisions if required) to ensure their protection.

Because these currently drafted statements will not protect the historic character of these important areas.

I trust you will take this into consideration.

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