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Ms Sarah Elding
Project Lead, State Planning Policies
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide SA 5001

RECEIVED

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DPTI

By email: DPTI.PlanningEngagement@sa.gov.au

Dear Ms Elding

DRAFT STATE PLANNING POLICIES – AUSTRALIA ICOMOS RESPONSE

I provide this letter as a submission on behalf of Australia ICOMOS to the Department of Planning, Transport and Infrastructure in response to the Draft State Planning Policies.

ICOMOS is the International Council on Monuments and Sites. We are a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees comprising ICOMOS. Australia ICOMOS has over 700 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees and Australian expert committees, heritage councils and boards. We are the author and custodian of *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013*, a world renowned charter promoting best practice heritage assessment and management.

Australia ICOMOS supports the need to review and amend heritage management in South Australia through the planning reform process. We provide the following feedback on the draft policies.

SPP2 Design Quality

Policy 7: Prioritise performance based design quality outcomes in Adelaide City; heritage and character areas; places where medium-rise buildings interface with lower-rise development; mixed-use renewal precincts; transit corridors; and iconic locations that attract high levels of pedestrian activity and/or tourism.

Australia ICOMOS supports high quality design at the interface of heritage places and new development. This is recommended to be undertaken through a clearly defined heritage impact assessment process, as recommended as a new policy under SPP7 (see below).

SPP3 Adaptive Reuse

Australia ICOMOS recommends inclusion of a new policy along the lines of:

8. Recognise energy efficiencies in retaining and adaptively reusing heritage buildings and structures.

Heritage should be integrated into the Green Star sustainability system. Rating tools generally do not provide any recognition of the sustainability benefits of conserving existing buildings, and the embodied energy inherent in these structures is not acknowledged. There is a risk that historic buildings will be demolished because they do not meet contemporary green standards. Systems such as NABERS and Green Star should better reflect the contribution of heritage buildings to sustainable outcomes.

SPP7 Cultural Heritage

The background text to this planning policy in the Consultation Paper focuses on Aboriginal heritage and is not inclusive of historic and maritime heritage. Australia ICOMOS recommends a more inclusive background statement for this planning policy for all types of heritage places in South Australia.

Australia ICOMOS recommends reference to the Australia ICOMOS *Burra Charter* to be added to the 'Non-statutory Guidance Notes' for this state planning policy. The Burra Charter promotes best practice heritage assessment and management, and various Practice Notes provide practical advice on matters such as interpretation, preparing studies and reports, and intangible cultural heritage.

Policy 1 states: *Support and promote the sensitive and respectful use of our culturally and historically significant places.*

The wording for Policy 1 could be simplified to:

1. Promote the diversity and support sensitive adaptive reuse of South Australia's heritage places.

Australia ICOMOS recommends the inclusion of two other policies:

3. Provide for impact assessment of development to and in the vicinity of heritage places and areas.

4. Provide incentives for property owners for conservation and sympathetic change to their heritage places.

Summary

As Australia's peak NGO for heritage management, Australia ICOMOS appreciates the opportunity to provide advice on the Draft State Planning Policies. We welcome any opportunity to continue to provide advice in relation to any of the matters raised in our submission.

Yours faithfully



IAN TRAVERS
President, Australia ICOMOS