

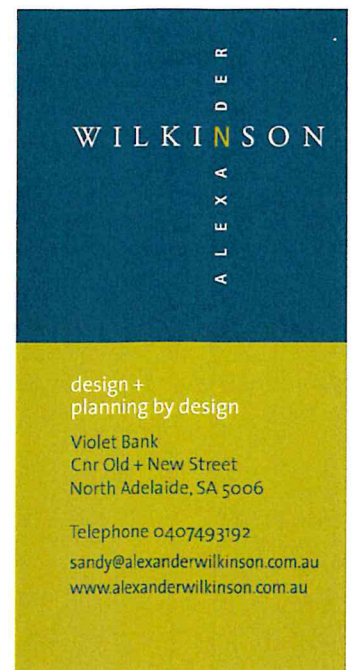
20 September 2018

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CONSULTATION:
DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA
Response from Sandy Wilkinson

Tim Anderson
Chair State Planning Commission,



SANDY WILKINSON – BACKGROUND (WHERE I AM COMING FROM)

1. I am probably most known as an Adelaide City Area Councillor and heritage supporter. I was first elected in 2007 and again in 2010 & 2014, on heritage and better planning platforms, so clearly my views are shared by those that supported me.
2. I am qualified in both Town Planning and Architecture with honours in Conservation.
3. Professionally I have worked as a heritage advisor for the City of Adelaide and been engaged as a Consultant by other Councils including the Unley and Burnside Councils on Development Plan reform pertaining to heritage and character whilst enabling growth.
4. I established ALEXANDER WILKINSON DESIGN Pty Ltd in 1999.
5. 60% of my work, some of which is pictured below, through my firm, is residential property development, (townhouses and apartments) in established, primarily historic, inner areas. 25% of my work is private residential and 15% is heritage restoration.



Sheppards Lane, Norwood



125 Payneham Road, St Peters



209 Melbourne Street, North Adelaide



My own development in Brown Street, Norwood

Submission of Sandy Wilkinson on DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

Part 1 THE ROLE OF STATE PLANNING POLICIES IN THE PLANNING SYSTEM**6**

The provision of consistency and certainty in the State Planning system is supported, however this system must accord with community expectations and not be a system of overriding local development plans.

Certainty in the Planning System is achieved by having clear parameters of development provisions, not performance based flexible approaches to planning. Developers and more importantly investors need to know what they can develop before they purchase sites.

A planning system does not create more development to occur, it merely guides where the development demand is taken up. In the CBD where the last Planning Minister introduced the Capital City DPA, we are seeing a smaller number of larger out of context developments, as opposed to a larger number of smaller, more contextual, developments providing for the same finite demand for apartments etc.

Part 2 THE IMPORTANCE OF PLANNING FOR OUR FUTURE POPULATION**12**

OK however the revisions to the planning system do not need to provide for well in excess of this projected growth, and so needlessly compromise our built environment with isolated spikes of development that are at odds with their surroundings, rather it is better than the growth be accommodated over a number of sites including behind listed buildings in the streetscape.

Part 3 OVERARCHING GUIDANCE TO THE PLANNING SYSTEM**14**

The most important measure of a good planning system, is not the ease of the process for applicants, which is an important consideration, but the quality of the planning outcomes that stay with us for decades to come, if not indefinitely if the property goes into multiple ownership. 1960's blocks of flats are seldom if ever demolished.

The most important thing that Town Planning, as a discipline, can and should achieve is to protect that which is desirable and sought by the community to be maintained about a given place, town or city. Determining how that place is subsequently managed and allowed to change follows that.

This fundamental principle that equates not just to demolition protection, but also protecting and maintaining the desirable qualities of a place, is completely absent from the diagram and discussion.

In terms of sustainability, the most significant gains can be achieved by retaining the embodied energy within existing buildings. Any development that involves the demolition of the existing building on a site is way behind in terms of sustainability from the onset.

Strengthening the economic prosperity of the state is best achieved by retaining the desirable streetscapes and qualities of a place, whilst enabling development behind heritage buildings.

The Re-use of existing buildings generates more, roughly double the employment and economic activity than new construction.

The value of the home renovation market to the State's economy is not mentioned. The renovation market is a larger part of the State's GDP than the new home sector and it certainly generates more employment, and notably in the SME sector.

Part 4 A SUITE OF SIX TARGETS**16**

OK NO COMMENT

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THE SPPS SET AN OVERARCHING FOUNDATION OF GOOD PLANNING PRINCIPLES BY WHICH TO BUILD THE PLANNING SYSTEM:

State Planning Policy 1: Integrated Planning

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State Planning Policy 2: Design Quality

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Our historic character buildings on our main streets and inner historic suburbs and towns are of a very high design quality and one of our State's most competitive advantages in a national and global scale that we must capitalise and not lose through the planning and development process.

Consistency and the maintenance of human and built form scale to the streetscape and sunlight to the footpaths are important aspects of design quality.

Performance based design quality outcomes in places where medium-rise buildings interface with lower-rise development such as the City of Adelaide and urban corridors is difficult to achieve without clear parameters to guide this sort of interface. This is because developers' objectives of maximising yields on their own site will invariably be at odds with achieving such outcomes. **Therefore prescribed podiums and setbacks is the only effective and fair and equitable way of achieving such outcomes** and so not detracting from the liveability and tourist appeal of these important high pedestrian activity locations.

State Planning Policy 3: Adaptive Reuse

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OK, however in my experience, since 1992, **historic character buildings require heritage listing to protect them** as is the case in Europe and the UK in order that they be adaptively re-used rather than demolished. Then planning policy needs to ensure that there is not a massive discrepancy between the scale of existing buildings, that are sought to be adaptively re-used, and new development height limits to the street. i.e. 6-storey height limits to the street frontage on main streets will not encourage adaptive re-use of unlisted historic character 1-2 -storey commercial buildings, but rather will encourage deliberate neglect as owners will perceive these only as potential redevelopment sites, and therefore not want to spend any money on them, as has been the case in Hindley Street, for example.

Once heritage protection is in place, then bonuses/ incentives etc will become effective however;

BCA changes and disabled access legislation is also needed to make adaptive re-use viable in many instances.

State Planning Policy 4: Biodiversity

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OK NO COMMENT

State Planning Policy 5: Climate Change

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OK NO COMMENT

Part 6 SPPS PRESCRIBED BY THE MINISTER FOR PLANNING THAT REFLECT STATE INTERESTS IN THE PLANNING SYSTEM.

Our People and Neighbourhoods

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South Australia's appeal is not just about being liveable and affordable, but also **desirable**. In my experience developers do not seek to provide affordable housing, but rather seek to charge as much as the market will pay. The City of Salisbury, for example, has vast tracts of undeveloped land and vacant blocks that have never been built upon. The land shortage argument put by volume home building companies is grossly exaggerated, many of these companies are already land-banking.

It is very common practice for speculators (inc developers and volume home building companies) to purchase agricultural or viticultural land at farmland prices and then lobby the government with this argument of needing to release new land for the sake of affordability. It is a ruse.

The '**enabling**' of renewal and development and existing urban areas to meet future housing needs is of concern. In areas where no historic character exists, one might reasonably forge a new character, however in inner historic areas and Main Streets this 'enabling' must be done in a more considered prescriptive way together with comprehensive heritage listings to ensure that this desirable character and liveability and appeal of these areas is not needlessly destroyed in the process.

State Planning Policy 6: Housing Supply and Diversity

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In my experience, with developer clients, the desire is invariably to provide as expensive a product as possible, not to provide affordable housing. I am concerned that 'access to diverse housing' is code for indiscriminately permitting inappropriate flat/apartment development in amongst neighbourhoods of lower density housing stock as opposed to along transport corridors near such neighbourhoods, but not in them.

State Planning Policy 7: Cultural Heritage

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This State Planning Policy seems to be unduly brief given the significance that Cultural Heritage for the lifestyle and tourist appeal as well as the economic driver that the restoration of Cultural Heritage provides for South Australia. The Objective is fine however the benefit of conservation, is for our economy as well as for present and future generations.

There is just one Policy pertaining to Cultural Heritage, which speaks only to the sensitive and respectful use of our culturally significant places.

There should be a Policy pertaining to compatibility of development adjacent to and in areas of cultural significance, such as our inner rim historic suburbs that are the envy of the eastern states.

There should be a Policy about identifying and protecting historic character by providing demolition protection for the very buildings which establish that historic character.

The Non-statutory Guidance Notes on The Planning and Design Code is good in so far as it discusses identifying areas of local heritage value and the identification of places or items including the extent of their cultural heritage.

However the first version of the Code **must incorporate the Contributory buildings** currently listed in Development Plans, not just the state and local items as many Council areas have used Contributory item listing to achieve the same community objective of demolition protection for the buildings that constitute the historic character that are valued by residents and the real estate industry alike.

There should be a third tier of protection for Historic Character formalised within the new state-wide planning system.

Submission of Sandy Wilkinson on DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

The policy should also go on to identify the imperative to achieve consistent protection for historic buildings of local heritage and historic character value, which is one of the areas of greatest inconsistency with the current Council by Council system, because many Council's, particularly in regional areas have not had the means, and perhaps local political will, to identify and list the cultural heritage within their Council area.

Our Productive Economy

State Planning Policy 8: Primary Industry

OK no comment

OUR INFRASTRUCTURE AND MOVEMENT SYSTEMS

OK no comment

OUR RESILIENT COMMUNITIES AND THE ENVIRONMENT

OK no comment

SANDY WILKINSON – CONCLUSION

The overhaul of our State's planning system creates a great opportunity to make development in South Australia an effective and consistent system across the state. It should not be used as a way of dismantling much of the very sound planning policies that have been developed over many years.

Rather it should be able to improve the quality of planning outcomes for everyone whilst enabling the considered and measured growth of our population and changing demographics.

Yours Faithfully



ALEXANDER WILKINSON
B.A(Planning)B.Arch.hons(Conservation)

Director
ALEXANDER WILKINSON DESIGN PTY LTD

CONTRIBUTION OF HERITAGE TO STATE'S PROSPERITY & EMPLOYMENT

1. One of Adelaide & South Australia's significant points of appeal and advantage over other cities and states in Australia is our relatively intact stock of historic character stone houses and commercial buildings, which are the envy of the eastern states.
2. The building/house renovation market constitutes a larger portion of the state's GDP than the new home market, however it is comprised mainly of SME's (small-medium enterprise businesses) who do not generally have the ear of Government.
3. Whilst it is true that one could often build a new house for what it cost to renovate and add on to an old one, the end result is no comparison.
4. Old turn of the century stone houses such as Adelaide's cottages and villas would conservatively cost upwards of \$5,000/m² to build today, due to their quality, ceiling heights, materials, detailing and workmanship.
I am advised that the late David Cheney's reproduction homes were in the \$8-\$10K/m².
5. New townhouses, which I design, typically cost \$2-2,500/m² to build and this is at the upper end of the residential development spectrum. Project homes typically cost half that again, only \$1200-\$1500/m².
6. Yet the cost of renovating the existing houses is typically \$1000-\$1500/m², which yields a building that would cost upwards of \$5,000/m² to build.
7. For a new build 60-70% of the project cost is materials, (and not necessarily from SA or even Australia)
8. For a renovation this ratio is reversed such that 60-70% of the dollar-spend, is employing South Australians.
9. **So for every house that is not demolished, and so renovated instead, the employment generated is doubled.**
10. For a heritage restoration the labour content can be >80% and so the employment generated is nearly tripled.
11. Conversely for every historic house that is **demolished** for a new build, the **employment generated is halved.**
12. A new house might typically take 6 months to build, compared to 12 months for a renovation, this is a very good indicator of the amount of employment involved in these two types of building project.

PLANNING & DEVELOPMENT EQUITY & FAIRNESS

1. The most important thing that Town Planning as a discipline can and should achieve is to protect that which is good and sought by the community to be maintained about a given place, town or city. Determining how that place is subsequently managed and allowed to change follows that.
2. It is absolutely imperative that demolition protection is **absolute** and that it is not 'on merit'. Developers and other bidders for any property need to know whether a building on a site can be demolished or must be retained and incorporated into any new development when they bid for a property.
It would be profoundly unfair if a purchaser could purchase a property and then demolish it, having bid against others bidding on a different premise. The proposal to make demolition 'on merit' would be to open up a proverbial 'can of worms' and would create massive uncertainty and confusion for property purchasers and would be profoundly unfair to people who have already purchased next door to a Local Heritage or character place, on the basis that the adjacent house cannot be demolished.
The same goes for Planning Controls generally, and is the reason why any planning control needs to be applied consistently and fairly so as not to give unfair advantage to one who goes against or exceeds the planning controls. The

development and valuation industry base land values on what can or cannot be done with a given piece of land.



This house in Elizabeth Street Norwood is not listed/protected from demolition and was recently marketed as a potential development site!

A developer client of mine couldn't believe that it wasn't heritage listed! Yet he felt it should be!

CONSISTENCY OF HERITAGE ASSESSMENT/DESIGNATION

1. There is currently inconsistency in heritage/demolition protection for what is intended to achieve the same objective, ie protection of historic houses/buildings from demolition.
2. However this is not an indicator that the current situation provides too much protection, but rather that the existing situation provides intermittent protection to what most would assume was all listed/protected, as illustrated in this perverse outcome below.



NOT LISTED

LISTED

LISTED

NOT LISTED

NOT LISTED

3. This is due to a couple of factors, firstly some Council's, particularly in country areas, have not implemented heritage protection for political reasons, even after having had heritage surveys undertaken, secondly (as was the case above) because some very purist reviewing consultants have decided to 'not

recommend' the listing of buildings, which the public would assume or hope would be listed and so protected, like the ones above.

4. Even developers expect historic stone houses to be listed and not able to be demolished.
5. The inconsistency results in once originally identical houses having different rules applying to them.
6. Currently, as the Local Heritage Criteria are assessed by some very purist heritage consultants, buildings that are often quite superficially adulterated, through unsympathetic alterations in the 1960's for example, are not listed. This results in perverse outcomes, where there may be a street of identical Victorian era houses, yet one or two of them are then not listed because of such alterations. It needs to be recognized that such alterations, even if quite severe, such as widening of original front windows, or even additions in front of the original façade can be quite readily reversed and usually for significantly less cost than a new building. Typically heritage consultants who take a purist line are engaged by objecting property owners to make such a case.

The example on this page shows how one such building was successfully restored, despite starting out in a condition, which some purists consultants would have not listed.



Compare this house at 345 Halifax Street, Adelaide BEFORE (above) and AFTER (below) which demonstrates how successfully and readily unsympathetically modified properties can be restored and therefore why they should be listed.



7. Heritage listing should not just protect the perfect original condition houses, and leave the run down or unsympathetically ones unprotected, as it is the run down and adulterated historic houses which are the ones which need the heritage protection the most, from people who cannot or do not appreciate how readily they can be restored.
8. Incidentally it is these run down historic houses that have the most potential to generate employment in their renovation.



College Park has consistently had the highest average real estate value and it is because its stock of historic character villas are all currently protected as Contributory Items, such that even run down houses like this one can only be restored, and not demolished.

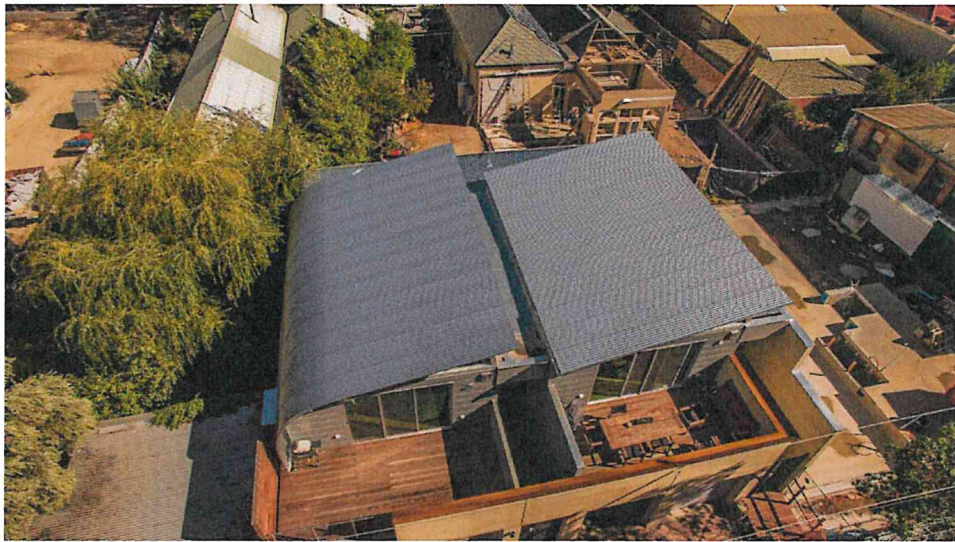
9. Structural integrity is rarely irreparable for stone load-bearing buildings in Adelaide. Currently many Council Development Plans, perhaps at the insistence of Planning Submission of Sandy Wilkinson on DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

- SA (now DPTI), having clauses allowing for the demolition of listed or contributory places on the basis of them being beyond reasonable structural repair. Such provisions as this are open to abuse. Typically an engineer is engaged by the person seeking to demolish on this basis, puts forward arguments that could be applied to any pre WWII building, which does not have modern concrete footings.
10. Structural repair by way of underpinning and the like, whilst costly are still very inexpensive compared to the cost of building a whole new house.
 11. It is imperative that listing of buildings in an area not only is done consistently including all buildings of a given era, regardless of superficial alterations or condition. It is only when such altered or neglected buildings are not listed that inconsistency comes about, which results in inequitable controls for different property owners and if these buildings are demolished an ultimately fragmented streetscape in place of an intact historic streetscape. It is these buildings that need the heritage protection most as opposed to pristine examples.
 12. For reasons of equity and good planning outcomes, the development potential of unlisted sites in an area or streetscape should achieve consistency in scale and development potential between listed and unlisted properties. This is achieved through such planning tools as requiring matching setback, number of storeys and setbacks to higher development behind, such that all properties have consistent development opportunity as opposed to a planning system that gives advantage to unlisted properties, and as a consequence disadvantages listed property owners, which gives rise to reasonable objection.



Grenfell Street offices with tower set back behind historic face/podium and adjacent development with comparable human scale podium, such that both sites have equal development potential.

13. Breach of the faith, which the Government has with the Community. Because people have purchased buildings since 1993 on the basis that they **are local heritage listed buildings or contributory buildings in HCZ's** and paid good money for such buildings surrounded by other similarly and listed buildings.
14. It could only be volume home building companies that must be pushing for these reforms to the local heritage and character areas, because the general public and developers that I know are not crying out for such reforms.
15. Local Heritage Items and Character items currently on constitute only a fraction of the developable land in and around Adelaide. In the city of Adelaide, less than 20% of the 10,000 properties in the city are listed, if all of the unlisted properties in the city, which should be listed were listed, it would still only amount to 25%. Listed buildings, which would represent less than 15% of the land area.
16. If the population of SA is taken as 1.7m with an average household size of about 2 people per household, the 8000 existing Local Heritage Listed buildings represents less than 1% of the states' houses, allowing for a relatively small amount of commercial buildings.
17. The Economic value of these buildings is invaluable to SA's tourism and would be future resident appeal.
18. There is ample scope to retain and restore heritage, which creates jobs and develop behind as I have done with my own property below in Norwood.



The examples on the next pages are projects, which I have done for clients that illustrate how even the most 'bastardised' buildings can successfully be restored and how 3-storey development behind retained retained and restored historic along transport corridors can be viably achieved and accommodate growth.



MIXED USE RESIDENTIAL/COMMERCIAL DEVELOPMENT

former MILTRONIX site
125 PAYNEHAM ROAD ST. PETERS



AERIAL VIEW FROM EAST



SOUTH WEST ELEVATION



MIXED USE RESIDENTIAL/COMMERCIAL DEVELOPMENT

former MILTRONIX site
125 PAYNEHAM ROAD ST. PETERS



NORTH Elevation



209 Melbourne Street restoration + development transformation



Submission of Sandy Wilkinson on DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA

PART 2: EVALUATION OF HERITAGE REFORM DISCUSSION PAPER

Applying Lessons from similar reforms interstate

Tasmania recently undertook reforms, which resulted in a 'rationalising' of heritage places, ie a reduction in the number of listed items. This was a foolish move from a state, which has its heritage and its environment as its greatest assets from a tourism and 'reason to live there' perspective.

Guidance should be taken from overseas practices. In Knightsbridge, London 95% of the building stock is heritage listed.

Updating the Local Heritage Criteria

Being very familiar with the current criteria, the proposed changes add threshold type adjectives, which ostensibly make it harder to meet the criteria for Local Heritage listing.

Some improvements could be made to the existing Local Heritage Criteria, for example the criteria (d) that refers to a buildings '**displaying**' historic construction techniques, has been used by some purist heritage consultants to 'not list' historic buildings that have been rendered like the before photo of the villa in Halifax Street because the original stone cannot be seen. The word 'displaying' should be replaced with the word '**has**'.

Similarly historic buildings concealed by aluminium cladding such as the Adelaide Central Markets, Beehive Corner and 61 Hindley Street, which have all had the cladding since removed have not even been recommended on account of 'not displaying'

If any changes to the criteria are to be made they should be intended to reduce inconsistency in assessment by different Heritage Consultants rather than to raise the bar further.

If the bar is to be raised for Local Heritage Listing in the manner proposed, then an additional level of demolition protection needs to be formalised, vis a vis Historic Character protection in Historic Conservation Zones, based on buildings being of a particular era in historic subdivisions as was proposed for the Unley Council.

SUGGESTED CHANGES TO CRITERIA

(4) A Development Plan may designate a place of local heritage value if-

- (a) it ~~displays~~ **has** historical, economic or social themes that are of important to the local area; or
- (b) it represents customs of ways of life that are characteristic of the local area; or
- (c) it has played an important part in the lives of local residents; or
- (d) it ~~displays~~ **has** aesthetic merit, design characteristics or construction techniques of significance to the local area; or
- (e) it is associated with a notable local personality or event; or
- (f) it is a notable landmark in the area.

Most of the **inconsistency** in current listings, in my observations since the Development Act 1993, has come about because buildings, which form part of original historic building stock of an area, have been **not listed** on account of '**not displaying**....design characteristics or construction techniques because they are rendered (345 Halifax Street) or concealed by front additions (like 209 Melbourne Street).

What is important is whether a building is one that does have or represent these themes and attributes.

It should not hinge on whether such a building has undergone superficial alterations or modifications in the 1960's or whenever.

My examples illustrate, that any such building can invariably be readily restored to its original appearance and as such should not be reason to condemn a building to potential demolition through not listing.

Implementing a framework document and 'practice direction'

The use of themes..... to help answer questions such as 'How many are too many?' indicates to me that the discussion paper is coming from a Noah's Ark approach where there is some imperative to keep a lid on the number of properties that become local heritage items.

A historic suburb is not a boat with limited capacity, if every building in a particular street is part of the historic makeup of the area, surely it is only fair that all of them are included.

Over representation is not a problem, it's an indication of a high degree of intactness, which is surely a positive thing.

What would be a problem is if a Noah's ark approach as being touted is adopted:

How would one choose which select ones are to be protected?

How would it be fair to the owners of the selected few if those unselected around them are allowed to be redeveloped?

If themes are to be used; they could be used to add understanding for the benefit of owners to new listing for example:

Theme: original nineteenth century workers cottages

Theme: houses that form part of the original 1905 farm subdivision.

Streamlining our listing process

The listing process is made long-winded currently by two main issues:

Firstly the Minister sitting indefinitely on Heritage DPA's as has occurred in the City of Adelaide since 2007.

Secondly the ability for some properties to get left off the list if argued strenuously enough that a building no longer displays.... or is so structurally beyond repair etc. Most people who hear these submissions know these are invariably spurious yet much time is wasted giving credence to such arguments. What is problematic is when some identical properties are subsequently not listed whilst others are due to this process.

A lot of time could be saved by having **historic character listing**, which is based simply upon the age of a period building within a context of similar aged period houses/buildings in a clearly and comprehensively demarked HCZ.

Interim effect is absolutely necessary to stop owners prematurely demolishing, which would be profoundly unfair to other property owners and subverts the process and puts buildings into needless jeopardy.

However I agree that better concurrent advice to owners of proposed listing is imperative.

Owners need to have it clearly explained that, for residential areas, there property values are likely to actually go up, that they CAN still do a modern addition, even 2-storeys at the back and that if their house perhaps, does not look as original as others in the street, how readily it could be restored, and how such work would enhance their property value.

There would be benefit to establishing what can and can't typically be done for a given type of property.

It does not need to be done for each and every house, rather for each type of scenario and special consideration given just to corner properties, which can be seen from two street frontages.

Street boundary fences should always be covered, either to protect original fences, or to ensure appropriate new fences and consistency between original and new fences.

Commercial property owners should be provided building envelope diagrams that illustrate how they can build up behind a designated setback behind the historic façade of their commercial building.

Improving how we record Local Heritage places

State Heritage, Local Heritage and Historic Character Contributory Items should be clearly shown on all Development Plan maps as well as on lists/schedules. It is imperative that this is done thoroughly so that incorrect-mapping is not used as an excuse to demolish.

Any buildings listed should be considered listed period. The notion of periodic review is an anathema to heritage, which is for all time and for future generations.

Clarifying the difference between 'Character' and 'Heritage'

Because various instrument of planning and heritage protection have come into being at varying times since the 1980's there are discrepancies to the terminology applied.

However, putting the semantics aside, the intention of all of these measures has been to protect the buildings identified in such areas from demolition.

Buildings should not have to be of Local Heritage significance, ie meet the current or proposed criteria, to warrant protection from demolition, which is what the public want and what developers anticipate in any event.

My suggestion is that Historic Conservation Zones be formalised and that **Historic Character** buildings within that zone, which is predominated by such buildings, be identified and afforded protection. As such a zone would afford protection to all buildings within an HCZ that were built as part of the original subdivision, ie pre 1915 or pre 1940.

That way all properties would receive equal treatment as opposed to the current situation where some are listed and some are not or some are permitted to be demolished on the basis of being replaced by a building that is argued to be of equal or greater contribution, which is missing the point of what is intended for such zones.

Simplifying our Development Assessment Process

It is absolutely imperative that demolition protection is **absolute** and that it is not **'on merit'**. Developers and other bidders for any property need to know whether a building on a site can be demolished or must be retained and incorporated into any new development when they bid for a property.

It would be profoundly unfair if a purchaser could purchase a property and then demolish it, having bid against others bidding on a different premise. The proposal to make demolition 'on merit' would be to open up a proverbial 'can of worms' and would create massive uncertainty and confusion for property purchasers and would be profoundly unfair to people who have already purchased next door to a Local Heritage or character place, on the basis that the adjacent house cannot be demolished.

Partial demolition of rear additions or rear portions of a local heritage item is presently provided for and is not non-complying and hence is not at issue.

I understand that some Council areas have demolition on merit now. This is where the problem lies. Demolition of a local heritage item should generally be Non-Complying in all Council areas for reasons of certainty, equity and consistency. Heritage assessment is not like Building Rules Consent and should be continued to be undertaken by Heritage Consultants/staff employed by Council. It is fine

privately engaged heritage consultants to present arguments on behalf of their client, but if that consultant were allowed to make the decision, those few Consultants who have a reputation for saying 'yes' to doing the 'wrong' thing by a heritage building, will tend to be engaged extensively whilst those more discerning consultants will not be consulted, period.

CONCLUSION

The whole review in this Local Heritage discussion paper appears to come from a premise that heritage is regarded as a handbrake on economic activity, whereas the converse is true.

For every house or historic building that is not demolished, due to heritage protection, it will be renovated instead, and while the dollar spend may be about the same compared to a new build, the amount of employment generated will ostensibly be doubled.

Yours Faithfully



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