

# Engaging for Reform



Community Alliance  
South Australia

## **PROTECT OUR HERITAGE CAMPAIGN TOOL KIT**



**Contributory Item: Dwelling at Gawler South Australia – Should this house and thousands of others be saved in SA? Yes! Can we save them?**

**Yes - we can!**

February 2019

**NOW IS THE TIME TO STAND UP FOR OUR HERITAGE SYSTEM  
GET PEN TO PAPER AND TAKE THOSE PHOTOS!**

Dear Community Alliance Partner,

The State Government is continuing to push forward the new planning system at a lightning pace, which may see the undermining of our heritage protection system. As all-volunteer groups, we are being bombarded with new policies, discussion papers and draft regulations that are complicated, legalistic and we are often provided with very short deadlines for submissions.

Like you, the committee members of Community Alliance SA are all volunteers, and we have been hard at work on your behalf meeting with politicians, government officials and partner organisations to identify what is most important for our submissions and advocacy.

**The first, and most urgent issue, is the fact that Contributory Items are at risk of losing their demolition controls. The streetscapes of Historic Conservation Zones, where Contributory Items are located, are also at risk.** The new planning system is silent on the protection of both of these, which underpin our heritage protection system. Many of us acknowledged that the current system of heritage protection is not perfect – but we must not let Contributory Items be demolished before a better system is in place. **Here is what we need to do:**

**ACTION 1:** Write to your local Member of Parliament requesting that the protection of contributory items within Historic Conservation Zones be maintained in the new planning system. When? By 1 May 2019. Goal: At least 20 letters to each MP.

**ACTION 2:** Take a leaf out of Amnesty's book and get a few people together from your group, plus any interested letter-writers, to send individual letters to your local MPs and newspapers. See the attached letter writing guide for tips and contact details. When? By 30 May 2019. Goal: Letter-writing 'working-bees' hosted by at least ten member groups.

**ACTION 3:** Take photos and videos of your favourite Contributory Items within nearby Historic Conservation Zones. This is vital for the campaign to protect them. To find out where they are in your local area email [sa.community.alliance@gmail.com](mailto:sa.community.alliance@gmail.com) and we will send you a list. When? By 1 May 2019. Goal: Photos received from at least fifty percent of local government areas.

**ACTION 4:** Get active in social media and encourage your members to like and share your posts as well as posts from Community Alliance members. When? Ongoing.

What are Contributory Items and Historic Conservation Zones? Find out more in the attached fact sheet, along with a letter writing guide and template. Thank you for your continued support of Community Alliance SA. Remember, we are only as strong as our members, so if your community group is not yet a member please send us your application form available on our website ([www.communityalliancesa.org.au](http://www.communityalliancesa.org.au)), or contact our secretary Tom Matthews on 0429 337 453 or email [sa.community.alliance@gmail.com](mailto:sa.community.alliance@gmail.com).

Happy letter writing and snapping!

Yours sincerely,



Christel L Mex  
**A/President**  
**Ph: 0401 126 173**



Tom Matthews  
**A/Secretary**  
**Ph: 0429 337 453**

## FACT SHEET

### SOUTH AUSTRALIA'S NEW PLANNING SYSTEM AND RISKS TO HERITAGE PROTECTION

#### What is happening?

- In 2016 the State Government passed new laws to start a complete overhaul of South Australia's planning system. This process was supported by both major parties and is scheduled for full implementation by July 2020. Since 2016, there have been many policies, discussion papers and regulations released for public consultation.
- The new system has diluted the planning powers of councils and will see the loss of local development plans in favour of a centralised Planning and Design Code (PDC). Planning assessment will be managed through a web-based portal with more authority given to private certifiers. Residents will only be consulted on a small number of developments and only on a very small number of decisions. The new Community Engagement Charter has no application to development assessment, as its focus is on policy consultation such as the PDC.
- The State Planning Policies have just been finalised and will influence policy in a number of documents including the PDC. We had somewhat of a win with the inclusion of more information on the value of built heritage within the cultural heritage policy.

#### Why is this important?

- The protection of heritage in the new system, in particular Historic Conservation Zones and the protection of valued individual buildings (Contributory Items), is uncertain. Community Alliance SA strongly suspects that the State Government is seriously considering the removal of all demolition protection for Contributory Items. Draft regulations currently out for public consultation allow for the future PDC to protect buildings in a zone, but does not specify what or where these zones are.
- Contributory Items are surviving examples of older buildings and they collectively contribute to the historic and architectural character of a particular area, and they are located primarily in Historic Conservation Zones. Along with State and Local Heritage Places, they are the building blocks of these zones. They play a fundamental role in protecting the heritage values and unique qualities of historic areas.
- Contributory Items have less protection than State or Local Heritage listed places. Altering or developing a Contributory Item is indeed possible with development approval. Sensitive upgrading and design is encouraged to ensure that the heritage value of the place and its surrounds is not detrimentally affected.
- There are approximately 11,000 Contributory Items registered in South Australia. This figure represents a meagre 1.8% of the total 741,748 separate and medium-density dwellings in our state (ABS 2016).
- Currently, an application for partial or complete demolition is assessed against the provisions of the relevant Council's Development Plan. These provisions generally discourage the demolition of such places. Complete demolition of Contributory Items is usually only considered if the structure is proven to be unsound (by a suitably qualified expert) and in a state of disrepair.

- The State Government has said that as part of the roll out of the new planning system, State and Local Heritage listed places will continue to be protected, **but they are silent on the protection of Contributory Items. In addition, the new draft planning regulations do not carry over the existing demolition exemptions for buildings in Historic Conservation Zones.**
- To demonstrate this confusion, in a submission to the ERDC Heritage Enquiry, DPTI's Manager of Planning Reform said, **"I don't think we can say definitively that contributory items will be translated exactly as they are now. I think the commitment we can make is that the outcome that is being sought through contributory items will be retained in a policy environment. We are certainly considering the role of local heritage areas and the policy framework for them that may alter the need for how the contributory items process runs. The commission has not had a stated position on this. It is something that we will continue to work through over the coming months."** (11 Feb 2019)
- For the last 25 years local heritage has had some level of protection, but the laws and their administration have been inconsistently applied. Administration of local heritage protection through the planning system has been problematic. The law and the administration of heritage protection is confusing, cumbersome and ineffective compared to other states. We are not protecting local heritage in the way that the public expects. In a rush to approve any type of development, the planning system is approving cramped, overbuilt apartment blocks and the needless demolition of historic places.
- Most of the public do not differentiate between local heritage, historic character and Contributory Items. Regardless of their classification, they are generally valued by the community and ought to be protected from demolition. **If the proposed regulations are implemented in their current form, this could escalate the demolition of Contributory Items and destroy and fragment Historic Conservation Zones.**
- The State Government's Heritage Planning Bulletin (2001) provided guidelines to Councils for the establishment of Historic Conservation Zones, including the retention of, and mapping of, Contributory Items. Unfortunately the State's framework for these zones and their Contributory Items has become unclear since that early guidance, with zones and character protection the subject of planning agency review for many years. A clear position on the State's policy framework has not emerged and the translation to the Planning and Design Code will be the subject of the *People and Neighbourhoods Discussion Paper* as part of the State Planning Policies, which has been delayed to early 2019.
- The only people who are likely to have been advocating for the removal of Contributory Items from the planning system would be lobby groups who represent developers, and volume home building companies whose 'modus-operandi' is building new homes, not renovating old ones.
- **To demonstrate this, in its submission to the Parliamentary Committee Enquiry into Heritage in September 2018, the Urban Development Institute of Australia proposed that "the Planning and Design Code should remove all reference to Contributory Items (both existing and in the future)". Similarly, the Property Council proposed "all existing listing to be reviewed".**

### **Economic value of the renovation industry**

- The renovation market makes up a larger proportion of the state's GDP than the new home market. However, the renovation sector is comprised of many small to medium enterprises who do not have the ear of Government, nor time to take out of their business for lobbying. These small businesses, each often comprising just a small number of employees, collectively employ many South Australians, more than the new home market.
- The British study, 'Power of Place' examined the relative amount of labour/employment to materials between renovation work and new construction. It found that for renovation of existing buildings, 60-70% of the cost was labour, and only 30-40% materials. Whereas for new construction 60-70% of the cost was materials and the labour comprised only 30-40% of the cost. For heritage restoration the labour component was more like 80% or more.

- For a new build, 60-70% of the project cost is materials, and not necessarily from SA or even Australia. For a renovation, this ratio is reversed such that 60-70% of the dollar-spent is employing South Australians, mainly in small businesses.
- **So for every house that is renovated and not demolished, the employment generated is doubled.** For a heritage restoration the labour content can be greater than 80% and so the employment generated is nearly tripled. Conversely, for every historic house that is demolished for a new build, the employment generated is halved.
- A new house might typically take six 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.
- The more run-down a historic home is, the more potential it has to generate employment. Therefore, these are the properties that need the protection most as they have the most potential to generate employment and are the most at risk of demolition.

### **Economic value of heritage protection**

- Donovan Rypkema, of Place Economics from Washington USA, has undertaken recent studies that find that property values increase with heritage/demolition protection when it is implemented comprehensively.
- There is a reason why St. Peters/College Park has the highest average real estate value and that is because it's historic character is comprehensively protected (by way of Contributory Items) such that people can buy into the area knowing that the historic character homes around the property they are bidding on will be staying. That property values drop off, north of the Historic Conservation Zone, is evidence of the converse.
- Colonel Light Gardens, a designated State Heritage Area, is another example of the positive impact that comprehensive demolition protection has on residential property values, compared to Daw Park or other adjacent suburbs.
- **Hence residential property values are increased, not because of the listing of one's own house, but because the neighbour across the street cannot damage or demolish their historic home and the streetscape continues to reflect a consistent historic character.**
- People are generally more comfortable with heritage listing if all of the original houses in an area or commercial buildings in a street have the same designation and any new development is required to be consistent in scale to the historic streetscape, such that the property controls are equitable and no-one is necessarily disadvantaged.
- Piecemeal listings can work the other way, where if a small number are listed, but the majority are not, then their property values are diminished as the historic streetscape quality is eroded.
- If planning zoning permits development seriously at odds with the prevailing historic density and scale, those few property owners may also miss out on the redevelopment opportunity that might otherwise exist for the unlisted properties.
- The number of existing local heritage and Contributory items is often cited by those lobbying for their removal as being a vast number, yet the actual number comprises a tiny percentage of the total number of houses in metropolitan Adelaide.
- It could not be said that Contributory Items diminishes the capacity for urban consolidation and population growth, as existing houses can sometimes be split into two and their rear gardens developed for 'hammerhead' type development.

- New construction can never maintain the character that is comprised of actual Historic Character homes. How can a new construction at typically less than \$2000/m<sup>2</sup> ever compare with a historic home construction which would cost \$5-6000/m<sup>2</sup> to build today?
- Reproduction houses, in place of original historic houses, that are not authentically done, with lower ceiling heights and compromised detailing, diminish the genuine historic character, and good reproduction houses, whilst they might visually fit in and not spoil an area, confuse the story of how our suburbs evolved, and should not replace the genuine article.
- Interstate and international visitors, be they tourists or future Adelaide residents, are drawn to Adelaide's largely intact stock of historic stone houses and buildings which adds to the economic appeal of Adelaide and South Australia.

### Planning and development equity and fairness

- The most important thing that planning as a discipline can achieve, is to protect that which is good and sought by the community in a given place, town or city. Determining how that place is subsequently managed and allowed to change follows this principle.
- **It is absolutely imperative that a high bar is set for demolition protection with a high degree of certainty.** Developers and home buyers need to know whether a building can be demolished or must be retained. That is what is achieved through delineating buildings spatially.
- 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 Contributory Item or Local Heritage 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.
- Good planning is about what benefits the public good, not just private interests. It is for the well-being of the whole community, the environment and future generations.

### Glossary of terms (from Heritage Planning Bulletin, Government of South Australia 2001)

- **Historic Conservation Zones** - are residential areas that provide demolition control over buildings within them. Approval is required to demolish a building located within them, whether or not it is listed as a Local Heritage Place. The Bulletin states that individual buildings proposed to be included in these zones be accompanied by a map showing State and Local Heritage Places and/or Contributory Items.
- **Contributory Items** – are not equivalent to a Local Heritage Place, but are surviving examples of the particular period and its historic character. Policies are directed at preserving the historic elements that contribute to the historic character of an area, and may state that they should be retained.
- **Local Heritage Places** - display historical, economic or social themes that are of importance to the local area and are designated as a places of local heritage value by a development plan. They are currently nominated by local councils and approved by the Planning Minister.
- **State Heritage Places** – places that demonstrates important aspects of the evolution or pattern of the State's history.

- **State Heritage Areas** – there are currently 16 in existence, including Port Adelaide, Mintaro, Hahndorf and Colonel Light Gardens.

For more information on the planning reforms, go to the State Government’s “Planning Portal” at <https://www.saplanningportal.sa.gov.au>. Here you can also sign up to their email updates.

More resources can be found at the website for Community Alliance SA, including a Letter Writing Guide, at <https://communityalliancesa.org.au>.

**Contact:**

Mr Tom Matthews

Secretary

Community Alliance SA Inc.

Email: [sa.community.alliance@gmail.com](mailto:sa.community.alliance@gmail.com)

Phone: 0429 337 453



## LETTER WRITING GUIDE

Writing informed and personal letters to Members of Parliament can make a significant impact on government policy. For example, the State Government recently amended their draft Planning Policies to include more detail on their position on heritage protection.

Here are some hints about structuring your letter for the current campaign to retain certainty in protecting our heritage.

### 1. The first paragraph:

- Include the topic of your letter. For example, "I am writing to express/voice (etc) my concern/disappointment (provide details)..."
- If you are writing to your own Member of Parliament, state that you reside in their electorate early in the letter.

### 2. Choose three important points to focus on:

- Flesh out the most persuasive points likely to gain support for your position.
- Address a new point in each paragraph.
- Writing three short letters to individual people is more effective than writing one long letter.
- Ensure your facts are accurate and credible.
- Acknowledge opposing arguments and evidence.

### 3. Personalise the issue and your relationship:

- Explain how the issue affects you, your family or your community.
- Provide examples of heritage areas in your local community that are important to you.
- A personalised letter may be more persuasive and have more impact.
- Indicate if you have ever voted for them, met them, supported their election campaign etc.
- The letter may be more effective if the politician feels closer to you.

### 4. Be cautious in relation to their views:

- If unsure of the views of the politician or political party on the issue, research it, ask them or explain why they should support your views.
- Avoid making assumptions about their views and comments which could be construed as critical towards them or their party.
- Do not offend needlessly. We all respond better to courtesy, friendliness and a pleasant approach than to abuse.

### 5. Call for action:

- Ask them to act on the issue (e.g. "do their part to protect heritage and contributory items", or, "publicly commit to protect contributory items...").

### 6. Ask for a reply:

- End the letter with a statement encouraging a reply (e.g. "I look forward to your response on this matter").
- Write back if you do not receive a suitable response within a reasonable timeframe.
- Include your name and address on both your letter and envelope. Include your other important contact information in the letter including name, address and e-mail address.



## **7. Copy in others**

- Include the names of those you will be sending a copy of the letter to (cc) to increase your impact. Don't forget to include Community Alliance Inc! ([sa.community.alliance@gmail.com](mailto:sa.community.alliance@gmail.com)).

## **8. Keep it short—one page!**

- Use correct salutations and addresses for the recipient.
- cc others in your correspondence

## **Contact Information – names and addresses for who you will be writing to**

A physical letter sent through Australia Post or dropped in the electoral office is the best, but if you can't do this an email will do. If you send your letter as an attachment to an email, remind the reader that the letter is attached to the email. Recipients who will be receiving copies of your letter (cc) can be emailed.

### **Contact details for House of Assembly:**

This website contains a map of electorates and all the contact information for MPs:

<http://www.parliament.sa.gov.au/Members/HouseofAssembly/Pages/ContactDetails.aspx>

### **Contact details for members of the Legislative Council:**

This weblink contains contact information for all MLCs in the upper house, including those important cross-benchers:

<http://www.parliament.sa.gov.au/LegislativeCouncil/Members/Pages/List%20of%20Members.aspx>

### **Contact details for State Planning Commission:**

Mr Michael Lennon

Chair, State Planning Commission

Members:

Ms Helen Dyer

Mr Craig Holden

Mr Allan Holmes

Ms Sally Smith (Ex officio)

GPO Box 1815, Adelaide SA 5001

Email: [admin@saplanningcommission.sa.gov.au](mailto:admin@saplanningcommission.sa.gov.au)

### **Contact details for letters to the editor:**

Why not increase your impact by drafting a shorter version of your letter as a Letter to the Editor? For helpful hints go to: <https://ctb.ku.edu/en/table-of-contents/advocacy/direct-action/letters-to-editor/main>

The Advertiser and Sunday Mail:

- Email [advedit@theadvertiser.com.au](mailto:advedit@theadvertiser.com.au)
- GPO Box 339, Adelaide SA 5001

Messenger Newspapers (don't forget to identify your local paper):

- Email: [letters@mng.newsltd.com.au](mailto:letters@mng.newsltd.com.au)

### **Always send a cc copy of your letter to the Community Alliance Inc. Contact details:**

Mr Tom Matthews

Secretary, Community Alliance Inc.

Email: [sa.community.alliance@gmail.com](mailto:sa.community.alliance@gmail.com)

For more helpful hints on letter writing for advocacy, go to this website from "Community Tool Box":

<https://ctb.ku.edu/en/table-of-contents/advocacy/direct-action/letters-to-elected-officials/main>

# **Letter template**

Date

Your Name

Your organisation (if applicable)

Full Address

Email and/or phone

Recipient's Name/Title Full Address

Dear [Recipient's name]:

## **RE: PROTECT OUR HERITAGE FROM DEMOLITION**

### **First Paragraph:**

Introduce yourself and tell who you are. State your reason for writing — what you want and why. *(eg: My name is Jane Smith, a long-time resident of Kensington. I am writing to ask you to do your part and put a stop to any proposal that will abolish demolition controls for Contributory Items as part of the Government's rush to implement the new planning system).*

### **Second Paragraph:**

Support the issue you are addressing with key statistics, compelling facts, and/or background information *(see accompanying fact sheet)*

### **Third Paragraph:**

Share your story to clarify your position. *(eg: I live in the Historic Conservation Zone of Kensington, which is one of Adelaide's oldest settlements and is unique for its early pioneer cottages and colonial architecture. Due to its group heritage listing, we still enjoy the amenity of many original which have been beautifully restored and cared for over time. While walking the streets, residents and tourists have the unique opportunity to feel what it may have been like during the early years of pioneer settlement. This will all be lost if Contributory Items, which form the streetscapes of Historic Conservation Zones and currently protected in Council Development Plans, are allowed to be demolished in the new planning system).*

### **Fourth Paragraph:**

Summarize and reiterate your position/request. Identify other ways your recipient can help with the issue. *(eg: I, along with many other residents who value heritage group listings, respectfully ask that you get back to me on how you will use your influence to ensure that the Government and State Planning Commission does not abolish the protection of contributory items, until a suitable replacement mechanism has been devised and agreed upon.*

**Fifth Paragraph:** Thank recipient for reading the letter and ask for a reply with his/her position on the issue and/or how he/she will address the issue.

Sincerely,

[Your name]

[Your Organisation]

Encl: If you can, attach examples of Contributory Items in your neighbourhood

cc: *Remember to list those who you will send a copy of the letter to. If you are writing to your local MP, cc the Premier, Planning Minister, Shadow Minister for Planning, State Planning Commission, the MLC cross-benchers, Community Alliance Inc. Contact details can be found in the weblinks above.*