



Chief Executive Officer
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Dear Sir

DRAFT LOCAL PLANNING POLICIES FOR HERITAGE

Thank you for your email of 8 March 2024 regarding the draft Local Planning Policies: Development Guidelines for Heritage Places, Assessing Cultural Heritage Significance, and Amending the Local Heritage Survey, Heritage List and Designating Heritage Areas.

The City is to be applauded for their current focus on updating and modernising their suite of Local Planning Policies relating to heritage to ensure consistency with the regulations, Heritage Council guidelines and heritage best practice.

The draft Local Planning Policies, Interpretation of Heritage Places, and Assessing Cultural Heritage Significance are clear and well-structured documents. The Assessing Cultural Heritage Significance policy would benefit from more clearly identifying thresholds for inclusion of places in the City's Local Heritage List. Currently it is unclear if management category 3 places are below the threshold for inclusion.

The draft Local Planning Policy: Development Guidelines for Heritage Places is also generally a clear and well-structured document. However, it does appear that the Outcomes and Acceptable Development standards seem to have been written with a particular typology of place in mind, ie. residential. Some of the objectives and outcomes may be problematic for non-residential places. For example.

- Guiding principle 7 notes that it is required that 'Additions maintain existing view lines to the principal facade of the heritage place when viewed from the street'. This requirement may be too onerous for larger non-residential sites.
- Clause 3.1 Bulk and Scale – notes in Objective 3.1.1 that 'Additions are designed to respect the scale and proportion of the existing heritage building, which shall remain the dominant structure on the site when viewed from the street.' This may not be possible where larger scale development is proposed for a non-residential sites.

There also appears to be some minor errors relating to interpretation of the regulations and terminology.

- In 'Definitions' for a Heritage Place - a) and b) should be one item.
- Item 1. Exemptions from Development Approval notes that 'internal building work where the interior of the building has not been specified as having heritage significance....' is exempt from requiring approval for places on the 'State List'. This is not an exempted activity under the Heritage Regulations for State Registered Places. State List is also not the correct terminology, which is State Register of Heritage Places.
- The policy in some parts refers to 'contributory places', which is correct terminology for Heritage Areas, but not for general policies relating to heritage. 'Heritage protected places' should replace the term 'contributory places.'

We hope that these comments are of value in the development of the proposed Local Planning Policies.