

**PROPOSAL TO INITIATE AN AMENDMENT
TO THE PLANNING & DESIGN CODE**

**Historic Area Statement Update
Code Amendment**

By the City of Adelaide (the Proponent)

_____ (Signature Required)

City of Adelaide (the Proponent)

Date: - insert -

This Proposal to Initiate document together with conditions specified by the Minister forms the basis for the preparation of a proposed amendment to the Planning and Design Code for the purpose of section 73(2)(b) of the *Planning, Development and Infrastructure Act 2016*. By signing this Proposal to Initiate, the Proponent acknowledges and agrees that this Proposal to Initiate, and any supporting documents may be published on the PlanSA portal by the Attorney General's Department.

_____ (Signature Required)

MINISTER FOR PLANNING

Date:

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1. INTRODUCTION

The Proponent is proposing to initiate an amendment to the Planning and Design Code (the Code Amendment) as it relates to land located within the Historic Area Overlay of the City of Adelaide Local Government Area (the Affected Area).

The purpose of this Proposal to Initiate is to seek approval of the Minister for Planning (the Minister) to initiate the Code Amendment under section 73(2)(b) of the *Planning, Development and Infrastructure Act 2016* (the Act).

The Code Amendment will update the Historic Area Statements, within Part 3 – Overlays - Historic Area Overlay – Historic Area Statements – Historic Areas affecting City of Adelaide of the Planning and Design Code. This will ensure the statements contain relevant and clear information to enable effective and efficient decision-making by heritage experts and planners during development assessment.

No changes to the boundaries of the Historic Area Overlay within the City of Adelaide are proposed in the Code Amendment.

This Proposal to Initiate details the scope, relevant strategic and policy considerations, nature of investigations to be carried out and information to be collected for the Code Amendment. It also details the timeframes to be followed in undertaking the Code Amendment, should this Proposal to Initiate be approved by the Minister.

The Proponent acknowledges that the Minister may specify conditions on approving this Proposal to Initiate, under section 73(5) of the Act. In the event of inconsistency between this Proposal to Initiate and any conditions specified by the Minister, the conditions will apply.

1.1. Designated Entity for Undertaking the Code Amendment

In accordance with section 73(4)(a) of the Act, the Proponent (the City of Adelaide) will be the Designated Entity responsible for undertaking the Code Amendment process. As a result:

1.1.1. The Proponent acknowledges that it will be responsible for undertaking the Code Amendment in accordance with the requirements Act.

1.1.2. The Proponent's contact person responsible for managing the Code Amendment and receiving all official documents relating to this Code Amendment is:

(a) Kenneth Chan, Team Leader City Policy & Heritage

Email: k.chan@cityofadelaide.com.au

Telephone: 8203 7203

1.1.3. The Proponent intends to undertake the Code Amendment by:

(a) utilising professional expertise of employees of the Proponent including:

- Kenneth Chan, Team Leader, City Policy and Heritage
- Amanda McConnell, Senior Policy Planner
- Simon Carter, Senior Heritage Advisor

1.2. Rationale for the Code Amendment

The City of Adelaide has 14 Historic Areas, with each area having its own Historic Area Statements referenced by the Historic Area Overlay policies of the Planning and Design Code.

The Statements provide relevant contextual information for applicants to inform how they design proposed developments, including alterations and additions, and are relied upon by planners and heritage specialists and heritage architects during development assessment.

The Planning and Design Code has now been operational for over 2 years and improvement opportunities have been identified based on new knowledge and experience.

The Minister for Planning wrote to all relevant Councils inviting Councils to initiate proposals to update their Historic Area Statements in March 2023.

Council's submission to the Expert Panel's Planning System Review highlighted the need to fast-track updates to the Historic Area Statements.

Progressively updating the Planning and Design Code as it applies in the City of Adelaide is important to ensure the Code is fit-for-purpose.

An initial review of the Historic Area Statements, and review of heritage-related development assessment outcomes in the City of Adelaide reinforces the need to update the existing Historic Area Statements.

Updating the Statements will help to ensure they contain relevant information to enable effective and efficient decision-making by heritage experts and planners during development assessment.

2. SCOPE OF THE CODE AMENDMENT

2.1. Affected Area

The proposal seeks to amend the Code for the Affected Area, being the land within the Historic Area Overlay within the City of Adelaide as shown in the map in **Attachment A** and detailed in the table below.

2.2. Scope of Proposed Code Amendment

Current Policy	Part 3 – Overlays – Historic Area Overlay – Historic Areas affecting City of Adelaide: <ul style="list-style-type: none">• North Adelaide Hill Street Historic Area Statement (Adel1)• North Adelaide Childers East Historic Area Statement (Adel2)• North Adelaide Wellington Square Historic Area Statement (Adel3)• North Adelaide Tynte Historic Area Statement (Adel4)• North Adelaide Carclew Historic Area Statement (Adel5)
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	<ul style="list-style-type: none"> • North Adelaide Archer West Historic Area Statement (Adel6) • North Adelaide Margaret Street Historic Area Statement (Adel7) • North Adelaide LeFevre Historic Area Statement (Adel8) • North Adelaide Cathedral Historic Area Statement (Adel9) • North Adelaide Women’s and Children’s Historic Area Statement (Adel10) • North Adelaide Stanley Historic Area Statement (Adel11) • North Adelaide Kentish Arms Historic Area Statement (Adel12) • North Adelaide Finnis Historic Area Statement (Adel13) • Adelaide Historic Area Statement (Adel14)
<p>Amendment Outline</p>	<p>The overall objective of this Code Amendment is to update each of the Historic Area Statements to refine wording, include any necessary additional historical context, and to identify representative buildings within each historic area where appropriate.</p>
<p>Intended Policy</p>	<p>Part 3 – Overlays – Historic Area Overlays - Historic Areas</p> <ul style="list-style-type: none"> • Update the Historic Area Statements to: <ul style="list-style-type: none"> ○ refine wording and include any necessary historical context ○ identify representative buildings within each Area Statement ○ include images or diagrams, if considered appropriate. <p>South Australian Property and Planning Atlas (SAPPA)</p> <ul style="list-style-type: none"> • Update mapping of representative buildings within the existing extent of the Historic Area Overlay as it applies within the City of Adelaide.

3. STRATEGIC PLANNING OUTCOMES

Proposed Code Amendments occur within a state, regional and local strategic setting, which includes:

- State Planning Policies (SPPs)
- Regional Plans
- Other relevant strategic documents.

Key strategic documents, including State Planning Policies, Regional Plan, City of Adelaide Strategic Plan and relevant City of Adelaide policies and action plans are summarised here.

3.1. Summary of Strategic Planning Outcomes

The proposed Code Amendment will align with strategic policy outcomes including, but not limited to:

- Improve heritage protection and heritage guidance.
- Improve interface between land uses
- Achieve broader strategic aims for the city.

3.2. Alignment with State Planning Policies

The State Planning Policies (SPPs) set out the State’s overarching goals and requirements for the planning system. Under section 66(3)(f) of the Act, the Code must comply with any principle prescribed by a SPP.

The Code Amendment should be initiated because the strategic planning outcomes sought to be achieved through the Code Amendment align with or seeks to implement the following SPPs:

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
<p>SPP 2 – Design Quality</p> <p>Objective – to elevate the design quality of South Australia’s built environment and public realm.</p> <p>2.5 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.</p> <p>2.8 Recognise the unique character of areas by identifying their valued</p>	<p>The Code Amendment will enable the Planning and Design Code policy to encourage design quality via performance-based outcomes in heritage and historic areas.</p> <p>It will provide additional guidance for design and assessment to recognise and respond to the unique character and context of areas.</p>

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
<p>physical attributes in consultation with communities.</p> <p>2.9 Respect the characteristics and identities of different neighbourhoods, suburbs and precincts by ensuring development considers existing and desired future context of a place.</p>	
<p>SPP 3 – Adaptive Reuse</p> <p>Objective – The adaptive reuse of existing buildings that enhance areas of cultural or heritage value, capitalise on existing investment and/or contribute to vibrant and liveable places.</p> <p>3.3 Repurpose, adapt and reuse historical buildings and places that recognise and preserve our state’s history.</p> <p>3.4 Prioritise the adaptive reuse of buildings in areas of heritage or cultural value where it will contribute to active and vibrant places, or where it is a catalyst for additional development demand.</p> <p>3.5 Facilitate the conversion and adaptation of existing commercial office and industrial buildings to new uses that contribute to the local area.</p>	<p>The Code Amendment will strengthen the potential for adaptive reuse of existing buildings to repurpose, adapt and reuse historical buildings and places that recognise and preserve our State’s history.</p> <p>The proposed inclusion of representative buildings will assist designers and assessing officers to understand which buildings contribute to the local historic character and provide a contextual historic reference point.</p>
<p>SPP 7 – Cultural Heritage</p> <p>Objective – To protect and conserve heritage places and areas for the benefit of our present and future generations.</p> <p>7.1 The sensitive and respectful use of our culturally and historically significant places.</p>	<p>The Code Amendment will effectively encourage the sensitive and respectful use of culturally and historically significant places.</p> <p>It will also help maintain the context of areas of heritage value and provide greater certainty to landowners and the community about the planning processes for heritage identification, conservation and protection.</p>

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
<p>7.3 Recognise and protect places and areas of acknowledged heritage value for future generations.</p> <p>7.4 The appropriate conservation, continuing use, and as appropriate, adaptive reuse of our heritage places and heritage areas of value to the community.</p> <p>7.5 Maintain the context of a place or area of heritage value through appropriate design guidelines that encourage compatible design solutions.</p> <p>7.6 The interpretation potential of heritage places and areas is enhanced to contribute to the economic and cultural sustainability of the state.</p> <p>7.7 Provide certainty to landowners and the community about the planning processes for heritage identification, conservation and protection.</p>	

3.3. Alignment with Regional Plans

As with the SPPs, the directions set out in Regional Plans provide the long term vision as well as setting the spatial patterns for future development in a region. This includes consideration of land use integration, transport infrastructure and the public realm.

The 30-Year Plan for Greater Adelaide (2017 Update) volume of the Planning Strategy is relevant for this Code Amendment.

Regional Plan Identified Priorities or Targets	Code Amendment Alignment with Regional Plan
<p>Target 1.1</p> <p>85% of all new housing in metropolitan Adelaide will be built in established urban areas by 2045.</p>	<p>The City of Adelaide supports and promotes population growth within the city. The Code Amendment supports growth and appropriate development whilst protecting the heritage of the city.</p> <p>The Code Amendment will improve the information within the Historic Area</p>

Regional Plan Identified Priorities or Targets	Code Amendment Alignment with Regional Plan
	Statements to enable effective and efficient decision making by heritage experts and planners during development assessment.
<p>Adelaide City Centre</p> <p>P14 Strengthen the overall built form of the city, which is characterised by a grid pattern of streets and squares, contrasting with the open space of the Park Lands</p> <p>P22 Sustain the heritage, character and scale of valued residential precincts (including North Adelaide and the south-east and south-west corners) with contextually appropriate development that contributes to the needs of our growing population and provides services to the community.</p> <p>Design Quality</p> <p>P29 Encourage development that positively contributes to the public realm by ensuring compatibility with its surrounding context and provides active interfaces with streets and public open spaces</p> <p>P30 Support the characteristics and identities of different neighbourhoods, suburbs and precincts by ensuring development considers context, location and place</p> <p>P31 Recognise the unique character of areas by identifying their valued physical attributes</p> <p>Heritage</p> <p>P33 Recognise the value that communities place on heritage and ensure that new development is implemented sensitively and respectfully.</p> <p>P34 Ensure heritage places and areas of heritage value are appropriately identified and their conservation promoted</p>	Updating the existing Historic Area Statements in the City of Adelaide as they apply within the Planning and Design Code will improve the ability of planning assessment to contribute to the achievement these key strategic priorities.

Regional Plan Identified Priorities or Targets	Code Amendment Alignment with Regional Plan
<p>P35 Encourage the innovative and sustainable reuse of heritage places and older building stock in a way that encourages activity and entices people to visit</p> <p>A20 Explore opportunities to review local heritage listing processes within a more integrated framework.</p>	

3.4. Alignment with Other Relevant Documents

Additional documents may relate to the broader land use intent within the scope of this proposed Code Amendment (or directly to the Affected Area) and therefore are identified for consideration in the preparation of the Code Amendment.

The following table identifies other documents relevant to the proposed Code Amendment:

Other Relevant Document	Code Amendment Alignment with Other Relevant Document
City of Adelaide Strategic Plan 2020–2024	The Strategic Plan seeks to encourage smart, creative, adaptive reuse of heritage assets, including through incentives and promotion.
<p>Heritage: Our Future City of Adelaide (2021) Heritage: Our Future - Heritage Strategy 2021-3036 and Action Plan</p>	<p>Outcome 2 – Heritage is valued by our people and our communities</p> <ul style="list-style-type: none"> - Encourage best practice conservation - Ensure appropriate development - Unlock the economic potential of heritage places - Create vibrant precincts - Lead by example <p>Outcome 3 – Our City is renowned for its heritage.</p> <ul style="list-style-type: none"> - Celebrate our built and cultural heritage - Continue to develop our heritage narrative - Promote the value of heritage conservation - Build heritage knowledge.
Other Strategic Policies and Legislation	<p>The Code Amendment will complement the strategic context of heritage within the City of Adelaide.</p> <p>This includes:</p>

Other Relevant Document	Code Amendment Alignment with Other Relevant Document
	<p>The National Heritage Management Plan under the <i>Environment Protection and Biodiversity Act 1999 (Commonwealth)</i>.</p> <p>World Heritage protection through the UNESCO World Heritage list tentative list submission (in progress). The City of Adelaide is a partner in the current World Heritage bid for the Adelaide Park Lands and City Layout, and the rural settlement landscapes of the Mount Lofty Ranges.</p> <p>The current nomination with the State Government to add the Park Lands and City Layout to the State Heritage Register under the <i>Heritage Places Act 1993 (SA)</i>.</p>

4. INVESTIGATIONS AND ENGAGEMENT

4.1. Investigations Already Undertaken

The table below identifies what investigations have already been undertaken in support of the proposed Code Amendment.

Investigation Undertaken	Summary of Scope of Investigations	Summary of Outcome of Recommendations
Heritage Assessment Review	Desktop review of planning assessment outcomes for heritage places, the context of heritage places and within Historic Area Overlays.	<p>Under the Planning and Design Code, arguments for contextual impacts need to be prepared in response to certain development types, e.g. visible solar panels, high fences, site-over development (on heritage grounds), lack of setback, lack of landscaping, crossover width etc.</p> <p>A distinct lack of development applications have been prepared a written contextual analysis for consideration with their application.</p>

Investigation Undertaken	Summary of Scope of Investigations	Summary of Outcome of Recommendations
		<p>The Code Amendment will improve assessment of contextual impacts.</p>
<p>Review of Historic Area Statements</p>	<p>Review of Historic Area Statement Adel1 to discern if the appropriate level of information had been included to allow adequate assessment of the Historic Area Overlay performance outcomes/criteria.</p>	<p>The Planning and Design Code has replaced prescriptive parameters for design with an applicant-led contextual assessment process.</p> <p>The Historic Area Statement is used to guide applicants in their design approach and is assessed through principles of the Performance Outcomes.</p> <p>The review identified that the existing Historic Area Statements do not provide clear guidance for contextual assessment within the Historic Area Overlay by those applying for development.</p> <p>Clearer definitions, less jargon and a focus on what contextual responses are appropriate is required in the Statements, with emphasis on defining Representative Buildings and their prevailing features within the Historic Area Overlay.</p> <p>The Code Amendment will better relate the Historic Area Statements to the guideline documents produced by PlanSA at a local context.</p>

4.2. Further Investigations Proposed

In addition to the investigations already undertaken and identified above, the table below outlines what additional investigations that will be undertaken to support the Code Amendment.

Further Investigations Proposed	Explanation of how the further investigations propose to address an identified issue or question
Historic Area Statements	Redraft City of Adelaide's Historic Area Statements to improve local contextual assessment and better address the need for 'prevailing patterns' in the Planning and Design Code.
Comparative assessment against other Council areas Historic Area Statements	Benchmark Historic Area Statements in City of Adelaide with Historic Area Statements in the Planning and Design Code to inform the level and type of information to be provided.
Adelaide Vernacular style guideline	Undertake additional research to determine any vernacular expressions of the historic styles that warrant inclusion in the Historic Area Statements.

4.3. Engagement Already Undertaken

In accordance with Practice Direction 2, the State Government's Planning and Land Use Services (PLUS) team has been consulted on this proposal. In summary, the following matters were raised by PLUS:

- Historic Area Statements can include additional contextual information where practicable and beneficial to the objectives of the State-wide planning system.
- There are challenges with defining prevailing patterns within the City of Adelaide Historic Area Overlays as there are numerous prevailing styles, but no identified representative buildings to assist applicants with contextual analysis.
- Councils use different approaches to the Historic Area Statements, ranging from 'black and white' assessment tools to use as general guidelines.
- The need for clearer, less jargoned (or appropriately jargoned) statements with explanatory guidelines to assist applicants with their contextual analysis.
- The possibility to use the State Heritage Area Guidelines recently completed by Heritage SA to format and guide preparation of new Historic Area Statements.
- Historic Area Statements have scope to be expanded with relevant background and contextual information to explain why they are important.
- Existing PlanSA guidance documents for Historic Areas are not statutory and Council may develop their own guidelines to assist applicants to undertake contextual assessment to get better design outcomes.

In addition, the following engagement has also occurred on the proposed Code Amendment:

- Internal consultation with Council heritage advisors relating to the appropriateness of existing Historic Area Statements and opportunities for improvement.

4.4. Further Engagement Proposed

In addition to the engagement already undertaken and identified above, the table below outlines what additional engagement will be undertaken to support the Code Amendment.

Further Engagement Proposed	Explanation of how the further engagement propose to address an identified issue or question
Notification of the Code Amendment to landowners and business owners of land within the Historic Area Overlay.	Identify the potential impacts of the Code Amendment outcomes on development in the Historic Area Overlay and provide an opportunity for their input into the Code Amendment to better inform their positions as persons/entities being directly impacted by the Code Amendment
Letters to Government Agencies, including Heritage SA, advising of the Code Amendment	Provide an opportunity for Government Agencies to comment on the proposed outcomes of the Code Amendment and respond to any issues of consistency or otherwise to State agency policy positions.
Letters to representative industry and community groups such as LGA (SA), National Trust (SA), SA Heritage Council, Property Council (SA), UDIA (SA), local trader and main street groups, residents and ratepayer groups	Inform interested stakeholders about the Code Amendment. This will allow for identification of any specific issues or positions from the range of interests represented by the groups, along with their level of support (or otherwise) for the proposed policy framework.
Letters to adjoining Councils and Local MPs	Provide an opportunity for adjoining Councils and/or local MPs to comment on the proposed policy change and to consider broader impacts on their respective community and/or constituents.
Notification and survey on Council's website and links through Council's social media to the broader community.	Broad community consultation to provide an opportunity for any interested community members to be aware of the proposed Code Amendment and make comment on the proposed outcomes of the Code Amendment. This engagement will clearly state what is and isn't in scope for the Code Amendment.
Information placed on PlanSA Portal to inform the community of the Code Amendment, its proposals and its progress.	<p>The Code Amendment Proponent uses the PlanSA Portal to inform the community about the Code Amendment, including:</p> <ul style="list-style-type: none"> • Provide the proponent's contact information. • Provide information on how the community can contribute to the Code Amendment. • Inform the community of the Code Amendment's progress.

Further Engagement Proposed	Explanation of how the further engagement propose to address an identified issue or question
	<ul style="list-style-type: none"> • Provide relevant documentation assigned to each stage, such as the engagement plan, fact sheets and the Code Amendment that allows the community to access the relevant documentation when needed and be informed about the Code Amendment process. • Finalised Code Amendment. • Summary of the Code Amendment’s engagement, which includes how engagement did or did not alter the Code Amendment (and a copy of the Engagement Plan).

5. CODE AMENDMENT PROCESS

5.1. Engagement Plan

The Code Amendment process will occur in accordance with the Community Engagement Charter and Practice Direction 2 – Consultation on the Preparation or Amendment of a Designated Instrument.

The Designated Entity has prepared a draft Engagement Plan (**Attachment C**) which includes the following mandatory consultation requirements:

- The Local Government Association must be notified in writing of the proposed Code Amendment
- If the Code Amendment has a specific impact on 1 or more particular pieces of land in a particular zone on subzone (rather than more generally), the Designated Entity must take reasonable steps to give a notice in accordance with Regulation 20 of the *Planning, Development and Infrastructure (General) Regulations 2017*, to:
 - the owners or occupiers of the land
 - owners or occupiers of each piece of adjacent land
- Consultation must also occur with any person or body specified by the State Planning Commission under section 73(6)(e) of the Act.

A draft engagement plan is included as an attachment to this Code Initiation Document, for information purposes only. The proponent reserves the right to amend the consultation plan with the final plan to be published to PlanSA portal.

5.2. Engagement Report

Once engagement on the Code Amendment is complete, the Designated Entity will prepare an Engagement Report under section 73(7) of the Act.

The Designated Entity must ensure that a copy of the Engagement Report is furnished on the Minister and also published on the PlanSA portal. This will occur in accordance with Practice Direction 2.

The Engagement Plan and the Engagement Report will also be considered by the State Planning Commission during the final stages of the Code Amendment process. The Commission will provide a report to the Environment, Resources and Development Committee of Parliament under section 74(3) of the Act. The Commission's report will provide information about the reason for the Code Amendment, the consultation undertaken on the Code Amendment and any other information considered relevant by the Commission.

5.3. Code Amendment Timetable

The Proponent (where it is also the Designated Entity) commits to undertaking the Code Amendment in line with the timeframe outlined in **Attachment B**. If a timeframe is exceeded (or expected to be exceeded) the Proponent agrees to provide an amended timetable to the Department with an explanation of the delay, for approval by the Minister of an extension of time for the Code Amendment.

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ATTACHMENT A

Map of Affected Area

Figure 1 – Map of Affected Area – existing Historic Area Overlays in the City of Adelaide



Legend

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 (Blue areas) Existing Historic Area Overlays within City of Adelaide LG

ATTACHMENT B

Timetable for Code Amendment by Proponent

Step	Responsibility	Timeframes
Approval of the Proposal to Initiate		

Step	Responsibility	Timeframes
Review of Proposal to Initiate to confirm all mandatory requirements are met (timeframe will be put on hold if further information is required). Referral to the Minister to request advice from the Commission.	AGD	2 weeks <i>(includes lodgement and allocation + referral to Government Agencies within the first week)</i>
Minister requests advice from the Commission.	Minister	2 weeks
Referral to Government Agencies for comment (where necessary).	AGD, Relevant Government Agencies	+ 2 weeks
Consideration of Proposal to Initiate and advice to the Minister.	Commission (Delegate)	3 weeks
	Commission	+ 3 weeks
Proposal to Initiate agreed to by the Minister	Minister	2 weeks
Preparation of the Code Amendment		
Engagement Plan Prepared. Investigations conducted; Code Amendment Report prepared. The Drafting instructions and draft mapping provided to AGD.	Designated Entity	8 weeks
AGD prepares Amendment Instructions and Mapping and provides to Council for consultation purposes.	AGD	1 week
Preparation of Materials for Consultation.	Designated Entity	To be informed by Engagement Plan
Engagement on the Code Amendment		
Code Amendment Report released for public consultation in accordance with the Community Engagement Charter and the prepared Community Engagement Plan .	Designated Entity	To be informed and may be subject to change pending finalisation of Engagement Plan
Consideration of Engagement and Finalisation of Amendments		
Submissions summarised; Amended drafting instructions provided, Engagement Report prepared and lodged with AGD.	Designated Entity	6 weeks
Assess the amendment and engagement. Prepare report to the Commission or delegate Timeframe will be put on hold if further information is required, or if there are unresolved issues.	AGD	4 weeks

Step	Responsibility	Timeframes
Consideration of Advice	Commission (Delegate)	2 weeks <i>(includes 1 week to process through Minister's office)</i>
	Commission	+ 3 weeks
Decision Process		
Minister considers the Code Amendment Report and the Engagement Report and makes decision	Minister	3 weeks
Implementing the Amendment (operation of the Code Amendment)		
Go- Live- Publish on the PlanSA portal	AGD	2-4 weeks
Parliamentary Scrutiny		
Referral of approved Code Amendment to ERDC	AGD	8 weeks

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ATTACHMENT C

Draft Engagement Plan

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City of Adelaide

Historic Area Statement Update Code Amendment **Draft Engagement Plan**

17 July 2023

Contact details

Name: Kenneth Chan

Position: Team Leader City Policy & Heritage

Email: k.chan@cityofadelaide.com.au

Phone: 8203 7203

Background information

- This Code Amendment will update the existing Historic Area Statements in the City of Adelaide.
- The City of Adelaide has 14 Historic Areas, with each area having its own Historic Area Statements.
- The Historic Area Statements are called by the Historic Area Overlay policies in the Planning and Design Code to assist in making planning decisions.
- The Statements provide information for applicants about local context to inform how they design their developments, including alterations and additions, and are used by planners and heritage specialists to assess development.
- The Planning and Design Code has been operational for over 2 years and improvement opportunities have been identified based on new knowledge and experience.
- The Minister for Planning wrote to all relevant Councils inviting Councils to initiate proposals to update their Historic Area Statements in March 2023.
- Council's submission to the Expert Panel's Planning System Review highlighted the need to fast-track updates to the Historic Area Statements.
- Progressively updating the Planning and Design Code as it applies in the City of Adelaide is important to ensure the Code is fit-for-purpose.
- Updating the Statements will help to ensure they contain relevant information to enable effective and efficient decision-making by heritage experts and planners during development assessment.

Engagement purpose

The purpose of the engagement is to:

- Raise stakeholder, affected and interested community awareness of the proposed changes to the Historic Area Statements.
- Seek feedback from stakeholders, affected and interested community on the Draft Code Amendment to enable their needs, ideas, and concerns to be considered in the Code Amendment.
- Raise awareness of the Final Code Amendment and close the loop on community engagement.
- Meet statutory requirements for engagement on a Code Amendment.

Engagement objectives

The engagement objectives are to:

- Seek feedback on the proposed updates to the Historic Area Statements which apply within the existing Historic Character Areas within the City of Adelaide.
- Allow stakeholders and community to provide feedback on the content of each of the existing 14 Historic Area Statements, including buildings that represent local character.
- Communicate that other heritage or character-related policy matters are not part of the scope of this Code Amendment, and will be addressed separately as part of Council's forward-program of Code Amendments.
- Clarify with stakeholders and community the matters that can and cannot be addressed through Planning and Design Code policy (and planning system).

Scope of influence

Aspects of the project which stakeholders and the community *can* influence are:

- Informing the project team about how updated Historic Area Statements can better inform development assessment in the City of Adelaide.
- Providing feedback on the proposed policy approach, including on any proposed representative buildings within the City of Adelaide.

Aspects of the project which stakeholders and the community *cannot* influence are:

- This Code Amendment will not remove any of the existing Historic Areas from the Historic Area Overlay of the Planning and Design Code.
- This Code Amendment does not propose to introduce any new Historic Areas within the City of Adelaide.
- The scope of the Code Amendment will not consider policy changes outside the boundaries of the City of Adelaide.

Key messages

The following key messages will underpin the engagement regarding the Historic Area Statement Update Code Amendment:

- The Planning and Design Code is used to assess development that occurs in the City of Adelaide.
- Historic Area Overlays in the Planning and Design Code includes contain planning policy for 14 existing Historic Areas in the City of Adelaide. The policies rely on the Historic Area Statements which contain information about each Historic Area.
- The overall objective of this Code Amendment is to update each of the Historic Area Statements to refine wording, include any necessary additional historical context, and to identify representative buildings within each historic area where appropriate.
- Updating the Statements will help to ensure they contain relevant information to enable effective and efficient decision-making by heritage experts and planners during development assessment.
- No changes to the boundaries of the Historic Area Overlay within the City of Adelaide are proposed in the Code Amendment.
- The Code Amendment relates only to the City of Adelaide and does not seek to introduce new policy that would affect any other Council area.

Level of Engagement

- The City of Adelaide is committed to undertaking community engagement in accordance with the principles of the Community Engagement Charter and is genuinely open to considering the issues raised by people in the community.
- The principles are:
 - Engagement is genuine
 - Engagement is inclusive and respectful
 - Engagement is fit for purpose
 - Engagement is informed and transparent
 - Engagement processes are reviewed and improved.

Stakeholder Mapping

The following table outlines stakeholders for the Code Amendment.

Stakeholder and community mapping

Stakeholder	Level of interest in the project (i.e. high, medium or low)	Level of influence	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
City of Adelaide – planning and development staff	High	High	Implications for development assessment.	Regular conversations and updates.	Involve
City of Adelaide – Infrastructure, City Operations, Park Lands, City Culture	High	High	Implications for delivery of key City of Adelaide strategic and operational outcomes.	Regular conversations and updates. Keep informed throughout progression of Code Amendment	Consult/Involve
City of Adelaide – Council Members	High	High	Broad interest in the balance of community, historic, heritage and economic outcomes within the City of Adelaide.	Keep informed throughout progression of Code Amendment. Decision maker.	Consult/Involve
Adelaide Economic Development Agency	High	High	Interest in development, residential growth and housing outcomes for the city.	Keep informed throughout progression of Code Amendment.	Inform/Consult
Local Government Association	Medium	Medium	Interest in approach to updating Historic Area Statements to inform other local government areas.	Statutory requirement to inform LGA as part of engagement plan.	Inform/Consult
State Planning Commission	High	High	Interest in balancing development with historic area conservation outcomes.	Keep informed throughout progression of Code Amendment. Actively seek feedback at key points.	Consult/Involve
PlanSA/PLUS	High	High	Interest in balancing development with historic area conservation outcomes. Actively encouraging City of Adelaide to update these statements.	Keep informed throughout progression of Code Amendment. Decision maker. Actively seek feedback at key points.	Consult/Involve
Local MPs - State Member for Adelaide – Lucy Hood - Federal Member for Adelaide – Steve Georganas	Medium	Medium	Interest in responding to concerns from constituents.	Keep informed throughout progression of Code Amendment.	Inform/Consult
Department of Environment and Water – Heritage SA	High	High	Technical expertise and high level of interest in how the Historic Character Statements are updated.	Keep informed throughout progression of Code Amendment. Actively seek feedback at key points.	Consult/Involve
Department of Infrastructure and Transport - roads	Low	Low	Interest in how the policy update may interact with development assessment related to roadways.	Keep informed throughout progression of Code Amendment.	Consult/Involve

Stakeholder	Level of interest in the project (i.e. high, medium or low)	Level of influence	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
Adjoining Councils <ul style="list-style-type: none"> - City of Burnside - City of Walkerville - City of Prospect - City of Charles Sturt - City of West Torrens - City of Unley - City of Norwood, Payneham and St Peters 	Medium	Medium	Interest in relationship with heritage and character policy and its operation within their respective local government areas.	Keep informed throughout progression of Code Amendment.	Inform/Consult
Property Council	Low	Low	Interest in effect of these land uses on property values and rental viability.	Provide opportunities to be informed	Inform/Consult
Planning Institute of Australia	Medium	Medium	Interest in planning policy and development assessment balancing development with historic area conservation outcomes.	Keep informed throughout progression of Code Amendment, actively seek feedback	Consult/Involve
Australian Institute of Architects	Medium	Medium	Interest in built form outcomes and development assessment processes.	Keep informed throughout progression of Code Amendment, actively seek feedback	Consult/Involve
Urban Development Institute of Australia	Low	Low	Interest in tracking the outcomes of this work and how it may relate to other local government areas including growth areas.	Provide opportunities to be informed	Inform/Consult
SA Tourism Commission	Low	Low	Potential interest in tourism value of Historic Areas to the City of Adelaide and South Australia.	Provide opportunities to be informed	Inform/Consult
Kadaltilla/Adelaide Park Lands Authority	Medium	Medium	Interest in relationship with adjoining Park Lands, including squares.	Keep informed throughout progression of Code Amendment	Inform/Consult
Relevant organisations located within Historic Character Areas, for example <ul style="list-style-type: none"> - Calvary Hospital - Churches - Universities - Etc. Note: all properties within the affected area will be informed, as described elsewhere in this table.	Medium	Medium	Interest in how the updated statements will affect their properties.	Keep informed throughout progression of Code Amendment	Inform/Consult

Stakeholder	Level of interest in the project (i.e. high, medium or low)	Level of influence	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
Main Street Groups – O’Connell Street, Hutt Street, Melbourne Street	High	Medium	Interest in role of Historic Character Areas in the local area.	Keep informed throughout progression of Code Amendment, actively seek feedback.	Inform/Consult
North Adelaide Society	Medium	Medium	Interest in role of Historic Character Areas in the local area.	Keep informed throughout progression of Code Amendment, actively seek feedback.	Inform/Consult
South East City Residents Association	Medium	Medium	Interest in role of Historic Character Areas in the local area.	Keep informed throughout progression of Code Amendment, actively seek feedback.	Inform/Consult
South West City Community Association	Low	Low	Interest in role of Historic Character Areas in the local area.	Keep informed throughout progression of Code Amendment, actively seek feedback.	Inform/Consult
West End Village Association	Low	Low	Interest in role of Historic Character Areas in the local area.	Keep informed throughout progression of Code Amendment, actively seek feedback	Inform/Consult
SA Heritage Council	High	High	Interest in how the updates to the Historic Character Statements will support heritage outcomes in the City of Adelaide.	Keep informed throughout progression of Code Amendment, actively seek feedback	Inform/Consult
National Trust of SA	High	High	Interest in how the updates to the Historic Character Statements will support heritage outcomes in the City of Adelaide.	Keep informed throughout progression of Code Amendment, actively seek feedback	Inform/Consult
Housing Industry Association	Low	Low	Interest in any changes to policy affecting housing development.	Interest in any changes to policy affecting housing development	Inform/Consult
Master Builders Association	Low	Low	Interest in any changes to policy affecting the building industry.	Interest in any changes to policy affecting the building industry	Inform/Consult
Affected Area Property Owners	High	High	Interest in any change of policy relating to their property or local area.	Keep informed throughout progression of Code Amendment, actively seek feedback	Inform/Consult
City of Adelaide ratepayers/residents	Medium	Medium	Interest in any change of policy relating to their property or local area.	Keep informed throughout progression of Code Amendment	Inform/Consult
Broader Community	Low	Low	General interest in whether and/or where these land uses could be enabled.	Keep informed to enable a response of interested persons	Inform/Consult

Risk Assessment

Area of Risk	Risk Analysis	Risk Rating	Mitigation Strategies	Intended Mitigation Outcome
Conflicting engagement outcomes	The risk is that the variety of stakeholders express conflicting issues, opportunities and concerns that aren't easily translated into a policy outcome	Low	Clear messaging to stakeholders of how planning can address issues and find connections between stakeholder feedback.	Stakeholders understand the project is to provide policy to reduce potential land use and community conflicts.
Timeframe doesn't allow consideration of each key stakeholder's perspective prior commencement of engagement.	Engagement misses key issues, concerns, and opportunities that the Code Amendment should consider/ address	Medium	Seek early feedback from key stakeholders and provide a variety of ways to meet, such as, online and in person.	Key stakeholder provide early input into the project which informs engagement materials.
Lack of support for amendment	Community members do not support changes to policy	Low	Explain rationale and need for updated statements clearly.	Community members are informed and have an opportunity to influence outcomes.
Technical information is difficult to communicate	Information amongst stakeholder and the community misrepresents the issues and proposed changes / impacts.	Medium	Provide clear and easy to understand information across a variety of platforms.	Clear understanding of issues and policy, and informed submissions.

Engagement Techniques

Key engagement techniques that can be used during this Engagement include:

- Fact sheets
- Face to face or online meetings
- Webpage on PlanSA Portal
- Submission Form/Online Survey on City of Adelaide "YourSay" webpage
- Letters/Electronic Direct Mail
- Social Media
- Phone and email inquires.

Engagement Period Activities

Stakeholder	How we will engage
City of Adelaide – planning and development staff	Via regular project team meetings.
City of Adelaide – Infrastructure, City Operations, Park Lands, City Culture	Via regular project team meetings and leadership meetings.
City of Adelaide – Council Members	Via Council meetings and regular Council E-News.
Adelaide Economic Development Agency	Via Board meetings.
Local Government Association	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
State Planning Commission	Correspondence informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
PlanSA/PLUS	One on one meetings. Via PlanSA Portal
Local MPs - State Member for Adelaide – Lucy Hood - Federal Member for Adelaide – Steve Georganas	Correspondence informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.

Stakeholder	How we will engage
Department of Environment and Water – Heritage SA	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Department of Infrastructure and Transport - roads	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Adjoining Councils <ul style="list-style-type: none"> - City of Burnside - City of Walkerville - City of Prospect - City of Charles Sturt - City of West Torrens - City of Unley - City of Norwood, Payneham and St Peters 	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Property Council	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Planning Institute of Australia	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Australian Institute of Architects	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Urban Development Institute of Australia	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
SA Tourism Commission	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Kadaltilla/Adelaide Park Lands Authority	Correspondence to the Executive Officer informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Relevant organisations located within Historic Character Areas, for example: <ul style="list-style-type: none"> - Calvary Hospital - Churches - Universities - Etc. <p>Note: all properties within the affected area will be informed, as described elsewhere in this table.</p>	Correspondence to affected area property owners informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Main Street Groups – O’Connell Street, Hutt Street, Melbourne Street inc. Master Planning groups	Correspondence to the Chair and to the City of Adelaide Main Street coordinators informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
North Adelaide Society	Correspondence to the Chair informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
South East City Residents Association	Correspondence to the Chair informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
South West City Community Association	Correspondence to the Chair informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
West End Village Association	Correspondence to the Chair informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
SA Heritage Council	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
National Trust of SA	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Housing Industry Association	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.
Master Builders Association	Correspondence to the CEO informing that the Code Amendment has commenced, how and who we are engaging and methods for feedback.

Stakeholder	How we will engage
Affected Area Property Owners	Direct letters for properties within or abutting an Historic Character Area. Also, via PlanSA Portal, City of Adelaide YourSay page and awareness of engagement via social media. Opportunity to attend drop-in sessions at City Library, North Adelaide Library and/or Hutt Street library.
City of Adelaide Ratepayers/Residents	Via PlanSA Portal, City of Adelaide YourSay page and awareness of engagement via social media, possibly via rates notice if the timing is right. Promote the consultation through a display board to be placed in the City Library, North Adelaide Library, Hutt Street Library
Broader Community	Via PlanSA Portal, City of Adelaide YourSay page and awareness of engagement via social media. Opportunity to attend drop-in sessions at City Library, North Adelaide Library and/or Hutt Street library. Additional methods of engagement will also be considered as appropriate, subject to timing, resourcing and effectiveness.

*this information does not need to be provided to the Minister

Measuring success

At the completion of the engagement, all participants will be invited to assess the success of the engagement against performance criteria one to four, below. The project manager, with assistance from communications and engagement specialists, will assess the success of the engagement against criteria five to nine. This evaluation will be included in the statutory report (section 73(7) of PDI Act) that is sent to the State Planning Commission and the Minister for Planning and which details all engagement activities undertaken. It will also be referenced in the Commission Report (section 74 (3)(b) that is issued to the Governor of South Australia and the Environment Resources and Development Committee of Parliament. Any issues raised about the engagement during the engagement process will be considered and action will be taken if considered appropriate.

#	Charter criteria	Charter performance outcomes	Respondent	Indicator ²	Evaluation tool ³ Exit survey / follow-up survey	Measuring success of project engagement
1	Principle 1: Engagement is genuine	<ul style="list-style-type: none"> People had faith and confidence in the engagement process. 	Community	I feel the engagement genuinely sought my input to help shape the proposal	Likert scale - strongly disagree to strongly agree	Per cent from each response.
2	Principle 2: Engagement is inclusive and respectful	<ul style="list-style-type: none"> Affected and interested people had the opportunity to participate and be heard. 	Community	I am confident my views were heard during the engagement	Likert scale - strongly disagree to strongly agree	Per cent from each response.
			Project Lead	The engagement reached those identified as community of interest.	<ul style="list-style-type: none"> Representatives from most community groups participated in the engagement Representatives from some community groups participated in the engagement There was little representation of the community groups in engagement. 	Per cent from each response.
3	Principle 3: Engagement is fit for purpose	<ul style="list-style-type: none"> People were effectively engaged and satisfied with the process. People were clear about the proposed change and how it would affect them. 	Community	I was given sufficient information so that I could take an informed view.	Likert scale - strongly disagree to strongly agree	Per cent from each response.
				I was given an adequate opportunity to be heard	Likert scale - strongly disagree to strongly agree	Per cent from each response.
4	Principle 4: Engagement is informed and transparent	<ul style="list-style-type: none"> All relevant information was made available and people could access it. People understood how their views were considered, the reasons for the outcomes and the final decision that was made. 	Community	I felt informed about why I was being asked for my view, and the way it would be considered.	Likert scale - strongly disagree to strongly agree	Per cent from each response.
5	Principle 5: Engagement processes are reviewed and improved	<ul style="list-style-type: none"> The engagement was reviewed and improvements recommended. 	Project Lead	Engagement was reviewed throughout the process and improvements put in place, or recommended for future engagement	<ul style="list-style-type: none"> Reviewed and recommendations made Reviewed but no system for making recommendations Not reviewed 	Per cent from each response.
6	Engagement occurs early	<ul style="list-style-type: none"> Engagement occurred before or during the drafting of the planning policy, strategy or scheme when there was an opportunity for influence. 	Project Lead	Engagement occurred early enough for feedback to genuinely influence the planning policy, strategy or scheme	<ul style="list-style-type: none"> Engaged when there was opportunity for input into scoping Engaged when there was opportunity for input into first draft Engaged when there was opportunity for minor edits to final draft Engaged when there was no real opportunity for input to be considered 	Per cent from each response.
7	Engagement feedback was considered in the development of planning policy, strategy or scheme	<ul style="list-style-type: none"> Engagement contributed to the substance of a plan or resulted in changes to a draft. 	Project Lead	Engagement contributed to the substance of the final plan	<ul style="list-style-type: none"> In a significant way In a moderate way In a minor way Not at all 	Per cent from each response.
8	Engagement includes 'closing the loop'	<ul style="list-style-type: none"> Engagement included activities that 'closed the loop' by providing feedback to participants/ community about outcomes of engagement 	Project Lead	Engagement provided feedback to community about outcomes of engagement	<ul style="list-style-type: none"> Formally (report or public forum) Informally (closing summaries) No feedback provided 	Per cent from each response.
9	Charter is valued and useful	<ul style="list-style-type: none"> Engagement is facilitated and valued by planners 	Project Lead	Identify key strength of the Charter and Guide Identify key challenge of the charter and Guide		

Closing the loop and reporting back

How will you respond to participants?	Who's responsible?	When will you report back?
Acknowledges responses to engagement	City of Adelaide	Within 3 weeks of a response being provided.
Website updates (SA Planning Portal) with the final Code Amendment and Engagement Report	City of Adelaide	When the Code Amendment is finalised and the Engagement Report is approved for public release by Council.
A close the loop email will be sent to participants with links to the SA Planning Portal, including an Exit Survey/Follow Up Survey	PlanSA/City of Adelaide	After Code Amendment Finalisation.