

HERITAGE STANDARD FOR THE GAWLER CHURCH HILL STATE HERITAGE AREA

YourSAy Engagement Report (September 2024)



BACKGROUND

South Australia's current planning and development system became fully operational in March 2021 with all operations under the *Development Act 1993* being replaced by the *Planning, Development and Infrastructure Act 2016*. The Planning and Design Code (the Code), which has replaced Development Plans across the state, is a single 'rule' book of planning policy for assessing development applications.

The 2021 planning reforms have strengthened the protections for State Heritage Areas (SHAs) by:

- introducing a SHA Overlay, covering the existing 17 SHAs, to protect and manage the heritage values of these areas. The SHA Overlay ensures that development within these areas is managed in a way that maintains heritage values. Importantly, the SHA Overlay policies take precedence over any applicable Zone and General policies in the Code, and the control over demolition is maintained.
- it also:
 - formalises the role of Statements of Significance for SHAs and '*other relevant documents*' (e.g. Heritage Standards) in the development assessment process.
 - provides the triggers for developments that must be referred to the Minister responsible for the administration of the *Heritage Places Act 1993* (the Minister).
- empowering the Minister to direct decisions on referred development applications, i.e. the Minister may direct the planning authority to refuse the development application or impose conditions in the event the planning authority approves it (previously the Minister was only empowered to provide advice for the planning authority's regard).

INTRODUCTION

Gawler Church Hill SHA is located in the centre of the plan for Gawler devised by Light, Finnis & Co in 1839. It has a distinctive character deriving from the consistent scale, form and density of the houses. Gawler Church Hill was planned with three central parks along Cowan Street and the three most dominant churches (Anglican, Catholic and Presbyterian) in Gawler had their buildings located adjacent to or in those parks. The SHA forms part of a relatively intact example of mid-19th century town planning and exhibits a high degree of integrity.

In response to current planning and development system, the existing Guidelines for Development for the Gawler Church Hill SHA were reviewed and updated by Heritage South Australia to ensure they:

- were fit for purpose;
- consistent with terminology in the Code; and
- reflect the Gawler Church Hill SHA's Statement of Heritage Significance.

The key changes in the Gawler Church Hill Heritage Standard included:

- updating the structure and terminology of the Heritage Standard, to mirror the structure of the SHA Overlay of the Code;
- strengthening language within the Heritage Standard to reflect its statutory status under the Code;
- clarifying the purpose of the Heritage Standard, as an assessment tool for Heritage South Australia's heritage architects/officers, as delegates of the Minister;
- including a detailed description of the heritage features of the Gawler Church Hill SHA, as a context for providing advice;
- describing the 'heritage values' of Gawler Church Hill SHA, to highlight what is of heritage significance; and

- revising guidance policy relating to materials, fencing and services (such as solar panels) reflecting current practices.

SUMMARY OF ENGAGEMENT

The draft Heritage Standard for the Gawler Church Hill SHA was released for public consultation on the YourSAy website from Friday 10 November 2023 to Wednesday 31 January 2024.

Key stakeholders were also engaged directly prior to and after the public consultation period.

ENGAGEMENT METHODS

Letters were sent to the Town of Gawler, the South Australian Heritage Council, key community groups and government authorities summarising proposed changes, and inviting people to comment via YourSAy Engagement survey or written submissions directly to Heritage South Australia, Department for Environment and Water (DEW).

The public consultation was also promoted via Town of Gawler, PlanSA and DEW websites, newsletters and social media and a media release.

To support property owners, residents and others to understand the draft Gawler Church Hill Heritage Standard and to support them making a submission, if they desired, Heritage South Australia, DEW offered the opportunity to talk face-to-face with Heritage South Australia officers about the draft Heritage Standard.

ENGAGEMENT OUTCOMES

FORM OF FEEDBACK	NO. OF RESPONSES
YourSAy on-line survey	13 respondents
Responses to Question 9 in the YourSAy on-line survey: <i>What is the most important aspect of Gawler Church Hill's heritage for you?</i>	11 responses
Responses to Question 10 in the YourSAy on-line survey: <i>Do you have any other comments on the Heritage Standard for the Gawler Church Hill State Heritage Area?</i>	10 responses
Emailed submissions (sent directly to Heritage South Australia, DEW)	13 submissions, including from the following organisations: - Town of Gawler - Friends of Church Hill Heritage Area (FoCHHA) - Anglican Parish of Gawler - Australian Institute of Architects (SA Chapter) - Gawler Environment and Heritage Association - Mount Carmel College
Face-to-face sessions	1 face-to-face session, attended by 4 people.

WHAT WE HEARD AND HOW WE RESPONDED

GENERAL COMMENTS

What We Heard

- As the Gawler Church Hill Heritage Standard serves a duality of purpose, as a statutory instrument for Heritage South Australia when providing advice in accordance with the *Heritage Places Act 1993* and secondly, to act as a guide for owners when considering development on their land, is the Heritage Standard fit-for-purpose for guiding owners?
- As not all development applications (DAs) in the Gawler Church Hill SHA require referral to Heritage South Australia, such as change of land use and minor development, and noting that the referrals of DAs have a significant cost and time impact on owners, can the Relevant Authority (Gawler Council) apply its own judgment in these matters, using the Heritage Standard to enable a robust assessment of the DA, rather than referring the DA,?
- The Gawler Church Hill Heritage Standard should include guidance on appropriate means of siting and installation of new technology, which includes emergency infrastructure, such as electricity storage banks, invertors and charging units.
- There is a lack of distinction in the Gawler Church Hill Heritage Standard between the desirability attaining faithful incorporation of original materials, colours, methods and treatments over modern materials, e.g. galvanised iron ahead of modern alternatives such as Colorbond.
- There should be a policy to periodically review the Gawler Church Hill Heritage Standard, including a requirement to undertake community consultation and with flexible engagement with the community.
- Do properties adjacent to the Gawler Church Hill SHA need to consider the Heritage Standard when proposing new development, given their interface with the SHA?
- Heritage South Australia should re-examine the boundaries of the Gawler Church Hill SHA, taking into account the existing SHA excludes adjacent properties which were part of the original Church Hill locality.
- There should be supporting documents for owners in the Gawler Church Hill SHA, relating to matters such as fencing and landscaping, as a means to ensure building owners are given direction when considering changes to their properties.
- The design philosophy regarding front setbacks is unclear. What is the position of Heritage South Australia regarding attaining the prominence of heritage buildings versus achievement of setback consistency of buildings in the Gawler Church Hill SHA?
- While the work done to date in preparing the Gawler Church Hill Heritage Standard is appreciated, some significant changes are needed to the Heritage Standard - there are some issues not dealt with, or adequately dealt with, in the Heritage Standard and need to be considered.
- Concern was expressed that Heritage South Australia and Gawler Council staff have not applied the clear principles set out in the 1998 Church Hill Management Plan, which was adopted at the time by both the then Department of Environment and Heritage and the Gawler Council and incorporated in the Gawler Development Plan in 2000 by the former Minister for Planning.
- Some of the development outcomes in the Gawler Church Hill SHA to date and contemplated future outcomes related to the tennis court land have not protected the heritage character of the Gawler Church Hill SHA. At significant expense, legal advice was obtained confirming the applicability of the 1998 Church Hill Management Plan to planning and development decisions, under the *Planning, Development and Infrastructure Act 2016* (PDI Act). It is believed that Heritage South Australia and Gawler Council staff have tried to circumvent that position.
- The Gawler Church Hill Heritage Standard needs to deal with the issue of inappropriate existing buildings or structures, some of which have been approved since the Gawler Church Hill SHA was designated in 1985.
- There needs to be a clear statement in the Gawler Church Hill Heritage Standard that the existence of buildings or parts of buildings/ structures that are inconsistent with the historic character of the Gawler Church Hill SHA should not be seen as support for retaining these features or replicating them elsewhere.
- This is a fundamental problem with the assessment of development proposals where the existence of something is used to justify replicating it, for example the division of land into smaller lots, adding replica or historic iron lace to

building frontages, new garages or carports with double frontages facing streets, vehicle entrances into properties concreted or paved across the footpath, PVC downpipes and PVC stormwater pipes exposed in the public realm.

- The heritage character of Gawler Church Hill SHA should be similar in the next 50 years, 100 years and ongoing. While flexibility is needed in various respects, there should not be gradual erosion of heritage character over time.
- The creation of new allotments for the purpose of more intensive housing or other uses or for much more intensive coverage of existing allotments should be clearly not be supported in the Gawler Church Hill Heritage Standard. The Gawler Church Hill area comprises less than 1% of the housing allotments in Gawler and there is no basis for arguing, for example, that more housing in Gawler Church Hill SHA is appropriate to assist in housing shortage issues.
- Other issues include the change of land use, which is not covered in the Gawler Church Hill Heritage Standard, and street frontages and fencing need further discussion and resolution of issues. Also landscaping and street trees of heritage significance is not covered.
- The illustration on the front cover in the Gawler Church Hill Heritage Standard and other historic pictures should be appropriately captioned, including a description of the painting/ photograph, a date [where available] and the painter's name etc.
- The Gawler Church Hill Heritage Standard needs to provide more useful advice for property owners and include useful references.
- Both the boundary of the Gawler Church Hill SHA and its Statement of Significance are problematic.
- The text of the Gawler Church Hill Heritage Standard should be expanded to describe how the Heritage Standard relates to the SHA Heritage Overlay.

How We Responded

- Responding to the question, is the Gawler Church Hill Heritage Standard fit for purpose for guiding owners, it should be noted that the Planning & Design Code is the primary guide for owners and the Heritage Standard endeavours to be clear and concise. Heritage South Australia staff are available to answer any queries.
- With respect to whether or not the Relevant Authority (Gawler Council) can apply its own judgment, using the Heritage Standard rather than referring the DA, the referral of DAs is a matter for the Gawler Council and it may use the Heritage Standard when assessing a DA in the Gawler Church Hill SHA.
- Regarding the Gawler Church Hill Heritage Standard providing guidance on siting and installation of new technology, the Heritage Standard has been amended to include reference to new technology.
- The use of original (heritage) materials as opposed to modern materials is acceptable and for non-heritage buildings there should be regard to using these original (heritage) materials.
- The periodic review of Heritage Standards is under consideration and in relation to engaging with the community, Heritage South Australia is always open to considering workable suggestions for improved engagement with the community.
- Properties in areas adjacent to the Gawler Church Hill SHA do not need to use the Heritage Standard when proposing new development. The SHA is bounded by Historic Area Overlay, which safeguards aspects such as land division, site configuration, streetscapes and other historic features.
- The current boundaries of the Gawler Church Hill SHA have been amended twice and Heritage South Australia is open to considering further amendments and making a recommendation for the South Australian Heritage Council to consider.
- The provision of supporting documents for owners in SHAs is under consideration by Heritage South Australia.
- While the policy contained in the 1998 Church Hill Management Plan document is applicable to making decisions regarding development in Gawler Church Hill SHA, it is however not an 'instrument' under the PDI Act's Code.
- To ensure that any future development conserves the character of the Gawler Church Hill SHA and upholds its heritage values, [Section 3.1](#) (Purpose of the Heritage Standards for Development) of the Heritage Standard has been reviewed and revised.
- The captions of illustrations throughout the Gawler Church Hill Heritage Standard have been reviewed and revised, where appropriate.

- The Gawler Church Hill Heritage Standard is different to the 1998 Church Hill Management Plan and the former Guidelines for Development document. The Heritage Standard can be used by owners and has been reviewed to improve this capacity. It is, however, not a management plan.
- Setbacks, whether consistent or otherwise, are part of the character of the street. New development is proposed to not be sited where it may dominate existing heritage buildings.
- Regarding the comment that the Gawler Church Hill Heritage Standard needs to provide more useful advice for property owners was noted. The principal purpose of the Gawler Church Hill Heritage Standard is to:
 - provide a basis for assessment of heritage impact of development by Heritage South Australia Heritage officers;
 - assert heritage principles and location specific detail on how development can be undertaken to ensure heritage values are protected; and
 - provide a minimum acceptable standard for development related solutions within the SHA.
- The comment that the boundary of the Gawler Church Hill SHA and its Statement of Significance are problematic was noted, but the preparation of the Heritage Standard for the SHA is not the mechanism to revisit these decisions.
- Regarding the suggestion that the text of the Gawler Church Hill Heritage Standard should be expanded to describe how the Heritage Standard relates to the SHA Heritage Overlay, information about this relationship has been prepared for State Heritage Areas website: [Department for Environment and Water – State Heritage Areas](#).

YOURSAY QUESTION 9: *What is the most important aspect of Gawler Church Hill's heritage for you?*

What We Heard

- The whole of the Gawler Church Hill SHA is important as exhibiting the social history of a 19th century town.
- The unique heritage housing in the Gawler Church Hill SHA, with two main churches facing each other.
- Exclude all development within the Gawler Church Hill SHA. In fact, its area should be increased.
- The heritage of the Gawler Church Hill SHA should be preserved while allowing for people to suitably conserve their property is vital. Poor restoration or unsuitable development will destroy the intricate nature of the Gawler Church Hill SHA - its buildings, open space, roads, verges, vistas and layout.
- There are sufficient additional areas in Gawler suitable for modern housing and/or subdivision without the Gawler Church Hill SHA needing to be affected.

How We Responded

- Regarding the whole of the Gawler Church Hill SHA being important as exhibiting the social history of a 19th century town, the Gawler Church Hill Heritage Standard references the historic streetscape, as well as individual heritage buildings, in particular refer to [Section 2.2](#) (What is of heritage significance) and [Section 3.1](#) (Purpose of Heritage Standards for Development).
- Noting the comment that development within State Heritage Areas should not be permitted, the Gawler Church Hill Heritage Standard, as a tool of the Planning and Design Code, specifies a framework for permitted development within Gawler Church Hill State Heritage Area that is intended to preserve heritage values, while allowing owners to maintain, improve and upgrade their properties over time.
- With respect to the boundaries of the Gawler Church Hill State Heritage Area being expanded, these boundaries have been determined through a formal process, including stakeholder consultation and have a legal status. There is currently no plan to expand the boundaries of the Gawler Church Hill SHA.
- For advice on preserving the heritage of the Gawler Church Hill SHA, people who own a property within the State Heritage Area should seek advice from Heritage South Australia. Heritage South Australia also publishes online guides on a range of topics that are designed to support and assist owners of heritage places, ie [Owning a heritage place](#).
- Regarding the comment that there are sufficient additional areas in Gawler suitable for modern housing and/or subdivision without the Gawler Church Hill SHA needing to be affected, the Gawler Church Hill Heritage Standard specifies a framework for permitted development within the Gawler Church Hill SHA.

YOURSAY QUESTION 10: *Do you have any other comments on the Heritage Standard for the Gawler Church Hill State Heritage Area?*

What We Heard

- New buildings absolutely need to be sympathetic to and in keeping with the tone of the Gawler Church Hill SHA. However, developers should be allowed some careful licence in material and design, so that they may have a chance to enhance the Gawler Church Hill SHA in their own way, rather than as a pastiche of new buildings made to look old. This approach never works well as you simply cannot replicate those crafts.
- There is support for the concept of protecting the heritage value of the Gawler Church Hill SHA, but in achieving that aim care is needed to ensure that the conditions applied are consistent with those heritage values while not imposing arbitrary conditions.
- Any conditions that are applied must support development within the Gawler Church Hill SHA and should permit the retrofit and updating of buildings to current/ future environmental performance standards, with emphasis on sustainability, thermal performance, and resource consumption.
- There was a request that churches, parsonages, manses or any other religious buildings should not be demolished.
- Too many times heritage-listing buildings and areas mean absolutely nothing. Too many buildings and areas have been demolished even though they've been heritage listed. Developers seem to get their way most of the time.
- Processes for owners need to be kept simple and not over onerous or costly. Decisions need to be quick, not drawn into dragged-out debates and consultation.
- The Gawler Church Hill Heritage Standard is vastly inferior to the previous version (Guidelines for Development?), as it lacks specific details to make it useful for residents, planners and potential property purchasers.
- The Gawler Church Hill Heritage Standard is also factually incorrect in much of its historical background. These inaccuracies reflect poorly on Heritage South Australia. Local residents have spent considerable effort correcting these errors and omissions and their suggestions come from decades of practical and professional experience. Please ensure their input is included in the revised Heritage Standard.

How We Responded

- Section 3.3 (New buildings) and Section 3.4 (Alterations and additions) of the Gawler Church Hill Heritage Standard address site, location, design, and materials for new development and alterations/additions in the Gawler Church Hill SHA.
- Regarding that the Gawler Church Hill Heritage Standard should specify that reproduction building styles are inappropriate, the wording for the Heritage Standard sets appropriate guidelines on style, materials and finishes without being overly prescriptive, in particular Section 3.9.1 (Conservation approach) states:
Conservation practices must avoid embellishing architectural details and adding features not common to the style and era of the building.
- With respect to protecting the heritage value of the Gawler Church Hill SHA and, in achieving that aim, care is needed to ensure that the conditions applied are consistent with heritage values, as a tool of the Code. The Gawler Church Hill Heritage Standard promotes development that does not impact the heritage values, subject to the assessment of the development by the Minister's delegates (Heritage South Australia).
- Regarding the retrofitting and updating of buildings to improve environmental performance while preserving heritage values, the *Heritage Places Act 1993* encourages:
the sustainable use and adaptation of heritage places in a manner consistent with high standards of conservation practice, the retention of their heritage significance, and relevant development policies.
Section 3.5 (Ancillary development) of the Gawler Church Hill Heritage Standard specifically addresses the addition of solar panels and rainwater tanks and proponents should contact Heritage South Australia for information about retrofitting and adapting heritage buildings.
- With respect to the comment that churches, parsonages, manses or anything other religious buildings are not demolished, Section 2 (Heritage Value) of the Gawler Church Hill Heritage Standard explicitly mentions the importance of churches and buildings associated with religious communities to the heritage of Gawler Church Hill SHA.

- Responding to the sentiment that heritage listing buildings and areas mean absolutely nothing and developers seem to get their way most of the time, Heritage Standards are designed to provide a consistent framework for the management of valued heritage of SHAs within South Australia, which are integrated within the State's planning system and therefore should provide greater protection for our heritage.
- Regarding processes for owners to be simple, not onerous or costly, and that decisions are to be quick, DAs affecting State Heritage Places, including newer buildings within SHAs, are governed by the legislated processes in planning legislation and regulations. Heritage South Australia also publishes online guides on a range of topics that are designed to support and assist owners of heritage places through those processes, ie [Owning a heritage place](#).
- With respect to the point that the new Gawler Church Hill Heritage Standard is vastly inferior to the previous version, Heritage Standards are not intended to replace Conservation Management Plans (CMPs) and serve a different, complementary purpose for heritage conservation and management of SHAs. As a tool of the Code, Heritage Standards have a legal status, whereas CMPs are only advisory in nature. Heritage Standards are primarily intended for internal use by officers at Heritage South Australia, when assessing DAs.
- Responding to the comment that the Gawler Church Hill Heritage Standard is factually incorrect in much of its historical background and specifically the request that any input is included in the updated Heritage Standard, Heritage South Australia has reviewed specific suggestions for corrections and revisions, received as part of the YourSAy Engagement consultation process, and has revised the Heritage Standard, where appropriate.

SPECIFIC COMMENTS

1. Background

Section 1.1 – Gawler Church Hill

What We Heard

- In the 1st Paragraph, with respect to *South Australian Heritage Act 1978-1980*, delete '-1980', as this Act continued for many years after 1980. Also delete '-1980' elsewhere in the Gawler Church Hill Heritage Standard.
- In the 2nd Paragraph, add the word 'individually' to *Development of a place individually listed in the South Australian Heritage Register ...* '. This addition makes this sentence more understandable given there is some confusion about State Heritage Places located in SHAs.

How We Responded

- The Gawler Church Hill Heritage Standard has been reviewed and revised, in response to these two comments.

Section 1.2 – Purpose of Heritage Standards

What We Heard

- Include text stating that one of the purposes of the Gawler Church Hill Heritage Standard is to provide information for landholders or prospective landholders in the Gawler Church Hill SHA about obligations related to the management and development of properties in the SHA.
- Owner obligations can be best set out in leaflets and other information materials, that should always form part of the promotion and information about the Gawler Church Hill SHA and provided to real estate agents. These obligations should also be included in the Gawler Church Hill Heritage Standard.

How We Responded

- While there is a need to inform landholders or prospective landholders about their obligations related to the management and development of properties in the Gawler Church Hill SHA, this is not the principal purpose of the Gawler Church Hill Heritage Standard, which is to provide:
 - a basis for assessment of heritage impact of development by Heritage South Australia Heritage officers;
 - heritage principles and location specific detail on how development can be undertaken to ensure heritage values are protected; and
 - a minimum acceptable standard for development related solutions within the SHA.

Section 1.3 – History – Gawler Church Hill

What We Heard

- Extensive editorial comments have been provided on [Section 1.3](#) (History- Gawler Church Hill).

How We Responded

- [Section 1.3](#) of the Gawler Church Hill Heritage Standard has been reviewed and revised, in response to these editorial comments, noting that the history in the Gawler Church Hill Heritage Standard is a condensed, not a definitive, history of Gawler and the Gawler Church Hill SHA.

Section 1.4 – Reference Documents

What We Heard

- A number of additional reference documents have been suggested for inclusion in [Section 1.4](#)

How We Responded

- Where relevant, some of the additional reference documents have been included in [Section 1.4](#).

Section 1.5 – Supporting Reference Documents

What We Heard

- Editorial suggestions as to the format of references have been provided for [Section 1.5](#).

How We Responded

- [Section 1.5](#) of the Gawler Church Hill Heritage Standard has been reviewed and revised, where appropriate, in response to these editorial suggestions.

2. Heritage Value

Section 2.1 –Statement of Significance (Gawler Church Hill State Heritage Area)

What We Heard

- There was an editorial suggestion to change the opening phrase of Section 2.1 from 'Gawler Church Hill is of heritage value for the following reasons:' to 'The entry recorded in the State [Sic] Heritage Register related to Gawler Church Hill State Heritage Area is as follows:'.
- The 1985 Statement of Significance is pretty limited in value and it is also odd to record the Gawler Church Hill SHA being entered in the Heritage Register in 1988 - 3 years after the declaration. How does that happen?

How We Responded

- While the suggested editorial change for the opening phrase introducing the Statement of Significance has been noted, it has not been altered, as it is consistent with the opening phrases used in the Heritage Standards for other SHAs.
- Changing the Statement of Significance for the Gawler Church Hill SHA is not within the scope of drafting the Gawler Church Hill Heritage Standard.
- The Gawler Church Hill SHA was originally gazetted on 6 June 1985, not in 1988. As the 1988 date is a typographical error, the date of the Statement of Significance has been revised to 6 June 1985.

Section 2.2 – What is of heritage significance?

What We Heard

Background

- With reference to the phrase '*contributed to the adoption of urban green belts globally*' in Paragraph 1 on Page 10, it is probably better to refer to '*parkland belts globally*'. The early parklands in South Australia were often used as commonage for example, for grazing, which doesn't quite sound like green belt.
- The Gawler Church Hill Heritage Standard needs to be altered to accommodate buildings at least up to the Lutheran Hall, adjacent Finnis Street and opened in 1954, in Paragraph 3 on Page 10. Noting also the St Joseph's School brick building, built in 1925. Both significant church-related buildings.
- It is suggested that the buildings constructed between 1954 and 1985 in the Gawler Church Hill SHA should be given a different status to just being regarded as not contributing to heritage character of the SHA and therefore targets for demolition.
- Given there are so few 1954-85 buildings mentioned the Gawler Church Hill Heritage Standard, the Heritage Standard could provide analysis and suggestions about alterations that fit in with character criteria.
- Circumspect analysis of the issues with buildings post-1985 could be included in the Gawler Church Hill Heritage Standard, otherwise it will be assumed that reproducing the designs, materials and appearance of these buildings will be appropriate.
- There needs to policy that will stop or severely discourage demolitions aimed at intensification.
- The extension of the Gawler Church Hill SHA in 2008 needs to be stated in the Heritage Standard, as adding the Gawler Primary School site.
- References to the Light Finnis & Co map, the spelling of Finnis needs to be spelt correctly.
- In relation to the heading of the sub-section '*Architectural features of extant 19th and early 20th century buildings of heritage value include:*', it was suggested that this heading should be changed to '*Architectural detail of extant 19th and early 20th century houses of heritage value include:*'. Also this sub-section should feature only houses and be structured to break down houses into period and style and should include related fence types.

How We Responded

- Regarding the comment on the history of 'urban green belts', while the suggested editorial comment is noted, the text in the Gawler Church Hill Heritage Standard has not been altered.
- The 1954 hall is not a major contributor to the story of Gawler Church Hill SHA and referencing the hall would mean also referring to many other buildings in the SHA that are not significant.
- The Statement of Significance for the Gawler Church Hill SHA does not include the period 1954 to 1985, however any demolition and/ or alterations of buildings from this period will be assessed on a case-by-case basis.
- Development in the Gawler Church Hill SHA, post-1985, does not provide a precedence for assessing future development in the SHA.
- Section 3.8 (Demolition) states that '*Demolition of buildings associated with the period 1839-1925, public realm structures, elements and other features of identified heritage value is not acceptable*'.
- Reference to boundary amendments, of which there have been two amendments for the Gawler Church Hill SHA, is not within the scope of the Gawler Church Hill Heritage Standard. There has been revision of the Heritage Standard accordingly.
- The spelling of 'Finniss' throughout the Gawler Church Hill Heritage Standard has been checked and corrected.
- The suggestion to rename sub-section '*Architectural features of extant 19th and early 20th century buildings of heritage value include:*' was noted, but it was not changed as restricting it to just houses would not be consistent with the format of existing Heritage Standards.

Building form

- Extensive suggested editorial comments have been provided for the Building form section, with comments and proposals to improve the content or the text.
- All of the photos shown in the Building form section should be appropriately labelled.

How We Responded

- The extensive suggested editorial comments on the Building form section have been reviewed and the text of the Gawler Church Hill Heritage Standard has been edited, where appropriate, in response to these editorial comments.
- The photographs in the Building form section are included to show the features within the Gawler Church Hill SHA which contribute to the heritage value of the SHA. However, individual properties are deliberately not identified, but will include street names for the photographs.

3. Heritage Standards for Development

Section 3.1 – Purpose of Heritage Standards for Development

What We Heard

- There is a need to set out information and parameters of the Heritage Standards for Development, so to assist potential land holders or others involved in purchasing properties in the Gawler Church Hill SHA and to assist landholders in the SHA to maintain or improve the character of the SHA.

How We Responded

- While there is a need to inform land holders or prospective landholders about their obligations related to the management and development of properties in the Gawler Church Hill SHA, this is not the principal purpose of the Gawler Church Hill Heritage Standard, which is to provide:
 - a basis for assessment of heritage impact of development by Heritage South Australia officers;
 - heritage principles and location specific detail on how development can be undertaken to ensure heritage values are protected; and
 - a minimum acceptable standard for development related solutions within the SHA.

Section 3.2 – Land use

What We Heard

- The land use planning commentary in [Section 3.2](#) needs re-writing, as Cowan Street in the Gawler Church Hill SHA is primarily residential and the other streets are overwhelmingly residential.
- Change of use is not discussed anywhere in the Gawler Church Hill Heritage Standard. Changing the current use, particularly 'residential' to 'commercial' or 'institutional' to 'commercial' has the capacity to change the character of the Gawler Church Hill SHA.
- The Gawler Church Hill Heritage Standard should mention maintaining the current balance between residential and other uses.

How We Responded

- With respect to re-writing the land use planning commentary in [Section 3.2](#), apart from including mostly residences, the Gawler Church Hill SHA also includes churches, a police station, a school and a hotel.
- Adaptive reuse (i.e. changing the current use) is supported by Heritage South Australia and endorsed in the *Australia ICOMOS Charter for Places of Cultural Significance* (the Burra Charter). However it should be noted that 'change of use' is a planning matter and is not a heritage matter, unless it impacts heritage value.
- The maintenance of the current balance between residential and other uses in the Gawler Church Hill SHA is a planning/ zoning matter and is not a heritage matter. Therefore, the Gawler Church Hill Heritage Standard does not refer to this matter.

Principle 3.2.1 – Land use

What We Heard

- The Acceptable Standard for [Principle 3.2.1](#) does not specify or give examples of adaptive reuses that could be acceptable. Furthermore, it does not recognise impacts to existing neighbouring land uses.

How We Responded

- The Acceptable Standard for [Principle 3.2.1](#) does not specify or give examples of acceptable adaptive reuses, as land use is not a heritage matter, it is a planning matter.

Section 3.3 – New buildings

What We Heard

- It is unfortunate that in the order of topics in the SHA Overlay that 'New buildings' is the first topic, which seems to send a confusing message for a Heritage Standard. The 1998 Church Hill Management Plan had 'New infill development' as the last part of the Plan, which seems more appropriate. A note explaining how the order of topics relates to the SHA Overlay would help, but could a different order of topics be used given this is a Heritage Standard?
- The scale/ size of diagrams in the Gawler Church Hill Heritage Standard are too small and hard to use. It is noted that specific drawings for the Gawler Church Hill SHA are being prepared and it is requested that these specific Gawler Church Hill drawings be provided for feedback, prior to finalisation.
- Generally, the wording of [Section 3.3](#) seems to lack the sort of precision, which would ensure that character of the Gawler Church Hill SHA will be maintained. The appearance of new buildings approved over the last 38 years does not inspire confidence. Street and boundary setbacks may have been generally achieved, but there are a lot of other deficiencies.

How We Responded

- The concern about the order of topics in the Gawler Church Hill Heritage Standard was noted, however no change was made to the Heritage Standard, as the order of topics reflects the order in the SHA Overlay.
- Due to time constraints in finalising the Gawler Church Hill Heritage Standard, the specific drawings for the Gawler Church Hill SHA were not able to be provided for feedback, prior to finalisation.
- Planning policy relating to 'New buildings' cannot be more prescriptive and it is not within the scope of the *Heritage Places Act 1993* or the Gawler Church Hill Heritage Standard to be more precise.

Principle 3.3.1 – Siting of new buildings

Sub section (a) – Street and side boundary setbacks

What We Heard

- Under the Acceptable Standard for [Principle 3.3.1\(a\)](#), the street setback is to match the dwelling it replaces. This Principle eludes that existing dwellings could be demolished and furthermore, if the existing dwelling did not contribute any historic attribute and was therefore acceptable for demolishing, the front setback of this dwelling may not be suitable for the new dwelling to replicate. Ideally, the front setback of all new development should maintain the spatial character of the streetscape.

How We Responded

- The Acceptable Standard for [Principle 3.3.1\(a\)](#) has been reviewed and revised to reflect the comment pertaining to street and side boundary setbacks.

Principle 3.3.2 – Form and design of new buildings

Sub-section a – Scale

What We Heard

- The wording relating to [Principle 3.3.2\(a\)](#) that 'New development should not "**dominate**" the existing scale of single storey established residential development' will simply not prevent inappropriate development – it will encourage it.
- In the Acceptable Standard for [Principle 3.3.2\(a\)](#), 50% site coverage for residential development (including ancillary development) is not a useful reference. For example, a site coverage should be variable, say 30% seems sufficient for the original ½ acre or 2,000m² blocks and maybe 40% for 1,000m² blocks and 50% for blocks of 700m² or less.
- Under [Principle 3.3.2\(a\)](#), no consideration has been given to properties that are located on the ridge of the hill. These properties may be able to accommodate two-storey buildings towards the rear with a single-storey

presenting to the street without affecting the historic streetscape.

- In the Acceptable Standard for [Principle 3.3.2\(a\)](#), the allowable building scale should be correlated with allotment size. Small allotments should have permitted higher development capacity, while large allotments should not enable development to be overly large.
- The term '*dominate*' in the Acceptable Standard for [Principle 3.3.2\(a\)](#) is open to interpretation and should be deleted.

How We Responded

- The comment that '*New development should not “dominate” the existing scale ...*' will not prevent inappropriate development is noted, however, there is no change required to the Gawler Church Hill Heritage Standard.
- As site coverage is a planning matter, the reference to site coverage has been removed from Acceptable Standard for [Principle 3.3.2\(a\)](#).
- The Acceptable Standard for [Principle 3.3.2\(a\)](#) now includes consideration of the properties that are located on the ridge of the hill.
- Heritage South Australia, as the primary user of the Gawler Church Hill Heritage Standard, interprets the term '*dominate*' to include height, bulk, scale, articulation, colour, modelling and design. Therefore, the term '*dominate*' has not been removed from the Acceptable Standard for [Principle 3.3.2\(a\)](#).

Sub-section (b) – Form and design of new buildings (Roof form and pitch)

What We Heard

- Under [Principle 3.3.2\(b\)](#), the specified roof pitches of houses in the Gawler Church Hill SHA are not typically 30-40°, it is typically 25-35°.
- The Acceptable Standard for [Principle 3.3.2\(b\)](#) specifies roof pitches that are neither consistent with existing roof pitches in the Gawler Church Hill SHA nor with the material provided in the document (see 'Features with the State Heritage Area ...' - 3rd photo on page 15). These pitches should be changed to match the actual construction in the Gawler Church Hill SHA, which is 20° to 40° pitch for primary buildings and much less on outbuildings.

How We Responded

- The comments relating to specified roof pitches of houses for the Gawler Church Hill SHA in [Principle 3.3.2\(b\)](#) have been noted and the specified roof pitches have been changed to 27-35° in the Gawler Church Hill Heritage Standard.

Sub-section (c) – Form and design of new buildings (Façade proportions)

What We Heard

- The Acceptable Standard for [Principle 3.3.2\(c\)](#) does not consider the width of the front facade of buildings within the streetscape.

How We Responded

- The width of the façade will be dictated by the size of the allotment, side setbacks and existing streetscape

Sub-section (d) – Verandahs and porches

What We Heard

- The Acceptable Standard for [Principle 3.3.2\(d\)](#) provides very little design guidance regarding front verandahs/porches. For example, what style and roof form of a verandah would be acceptable? How wide can the verandah be? Does the verandah need to replicate an historic style or can it be a modern interpretation? Drawings, illustrations and/or examples would also be beneficial.

How We Responded

- Regarding the questions about the Acceptable Standard for [Principle 3.3.2d](#), the form and design of verandahs and porches should complement the style of the dwelling. However, as there are large number of ways of achieving an appropriate result, the Heritage Standard does not aim to be too prescriptive.

3.3.3 – Materials, finishes and colours

What We Heard

- There are issues with consistency in citing eras/dates of heritage value in the Gawler Church Hill Heritage Standard.
- The Acceptable Standard for [Principle 3.3.3](#) specifies the materials and finishes for new buildings and imposes conditions that are un-necessary to maintain the aesthetic of the Gawler Church Hill SHA or which appear to be framed to preserve the building specific construction details, which are probably inappropriate for new construction.

How We Responded

- With respect to citing eras/dates of heritage value in the Gawler Church Hill Heritage Standard, and in particular [Principle 3.3.3](#), the text has been revised to the period '1839-1925'.
- Regarding the Acceptable Standard for [Principle 3.3.3](#), the text in the Gawler Church Hill Heritage Standard has been reviewed and revised, where appropriate, to include new materials.

Section 3.4 – Alterations and additions

What We Heard

- With respect to the opening paragraph for [Section 3.4](#), concern was expressed, without explanation, with using the following language *do not visually dominate existing buildings and/or the surrounding streetscape of heritage value*, in relation to those alterations and additions.
- The use of the era *19th and early 20th century development* is probably correct for referring to the character of the Gawler Church Hill SHA to be considered. However, this timeframe should not be limiting, when assessing buildings to be retained or considered appropriate for demolition.
- The diagrams on Pages 22, 23 & 24 of [Section 3.4](#) are too small and need to be larger/ clearer.

How We Responded

- The concern being expressed for using '*do not visually dominate existing buildings and/or the surrounding streetscape of heritage value*' for the opening paragraph of [Section 3.4](#) was noted, but the text in the Gawler Church Hill Heritage Standard has not been revised.
- The comment regarding of the era '*19th and early 20th century development*' should not limit the assessment of buildings to be retained or considered appropriate for demolition and the text in the Gawler Church Hill Heritage Standard has not been revised.
- Regarding the size of diagrams on Pages 22, 23 & 24 of [Section 3.4](#) in the Gawler Church Hill Heritage Standard, these diagrams have been updated.

3.4.2 – Design of additions

Sub-section 3.4.2(a) – Scale

What We Heard

- With respect to the Acceptable Standard for [Principle 3.4.2\(a\)](#), please note that two-storey buildings only occur as set downs on sites on the escarpment.

- Concern was expressed regarding Principle 3.4.2(a), without explanation, about using '*not dominate the existing built form*'.

How We Responded

- The text for Acceptable Standard for Principle 3.4.2(a) has been revised in the Gawler Church Hill Heritage Standard to consider sloping sites.
- The concern about using '*not dominate the existing built form*' for Principle 3.4.2(a) was noted, but the text in the Gawler Church Hill Heritage Standard has not been revised.

Sub-section (b) – Roof form and pitch

What We Heard

- There are issues with consistency in citing eras/ dates of heritage value in the Gawler Church Hill Heritage Standard, in particular in Principle 3.4.2(b).
- Suggest removing the word 'typically' for the Acceptable Standard for Principle 3.4.2(b), when referring to 'Non-residential development', i.e. *New roof forms are typically to match roof form and pitch of the existing building*, as this could result in an argument that there are acceptable options not to be typical.

How We Responded

- With respect to citing eras/dates of heritage value in the Gawler Church Hill Heritage Standard, and in particular Principle 3.4.2(b), the text has been revised to the period '1839-1925'.
- With respect to removing the word 'typically' for the Acceptable Standard for Principle 3.4.2(b), when referring to 'Non-residential development', a proposal for development may consider a non-typical option for its roof form or pitch, if there is a sound argument.

Sub-section (c) – Façade proportions

What We Heard

- A few buildings in the Gawler Church Hill SHA currently have their view from the street obscured, therefore it is suggested to change wording of the Acceptable Standard for Principle 3.4.2(c) for dwellings to cover frontages facing a street or viewable from street, which might include multiple frontages. The Gawler Church Hill Heritage Standard supports open viewable street frontages and there shouldn't be a free choice or benefit because a frontage has been obscured, for example by fencing.
- In Acceptable Standard for Principle 3.4.2(c), there could be a provision for not allowing significant variations to the proportion of frontages facing streets that are windows and doors, compared with other older buildings in the Gawler Church Hill SHA.
- The term 'seen from the street' in relation to Acceptable Standard for Principle 3.4.2(c) needs to be deleted. All fenestration (doors & windows) should complement heritage character of buildings, otherwise permitted 'modern works' could erode the heritage character of buildings over time.

How We Responded

- With respect to changing the wording of the Acceptable Standard for Principle 3.4.2(c) for dwellings to cover frontages facing a street or viewable from street, the text has been revised from '*Where seen from the street and surrounding public areas*' to '*Where visible from the public realm*'.
- Regarding the suggestion that there be a provision in Principle 3.4.2(c) for not allowing significant variations to the proportion of frontages facing streets that are windows and doors, the words of the Acceptable Standard have been revised.
- Regarding the term 'seen from the street', though the SHA Overlay refers to streetscape and visible from the public realm only, the text of the Acceptable Standard for Principle 3.4.2(c) has been reviewed and revised.

Sub-section (d) – Alterations to original building features of heritage value

What We Heard

- In relation to the Acceptable Standard for Principle 3.4.2(d) for Non-residential buildings: change '*view of the street*' to '*facing a street*' or '*viewable from street*'.

How We Responded

- For the Acceptable Standard for Principle 3.4.2(d), in particular for Non-residential buildings, the suggestion to change '*view of the street*' to '*facing a street*' or '*viewable from street*' was noted, but the text in the Gawler Church Hill Heritage Standard has not been revised.

Principle 3.4.3 – Materials, finishes and colours

What We Heard

- There are issues with consistency in citing eras/ dates of heritage value in the Gawler Church Hill Heritage Standard.
- In several places in Principle 3.4.3, change '*where visible from street/public space*' to '*where fronting or visible from street/public space*'.
- Principle 3.4.3 is quite descriptive when compared to other sections of the Gawler Church Hill Heritage Standard and could be considered too restrictive, particularly if applied to additions which are not supposed to be visible to the streetscape.
- Consider adding a sub-section (h) for post boxes or like structures, with text to support styles and colours matching traditional ones in the SHA.

How We Responded

- With respect to citing eras/dates of heritage value in the Gawler Church Hill Heritage Standard, and in particular Principle 3.4.3, the text has been revised to the period '1839-1925'.
- The suggestion to change '*where visible from street/public space*' to '*where fronting or visible from street/public space*' throughout Principle 3.4.3 was noted, but the text in the Gawler Church Hill Heritage Standard has not been revised.
- Principle 3.4.3 is designed to provide a palette for materials, finishes and colours in the Gawler Church Hill SHA and could be applied in a variety of creative ways. Therefore, the text of Principle 3.4.3 has not been revised.
- With respect to adding a sub-section (h) for post boxes or like structures, they are not defined as being 'development' in a SHA and therefore the text in the Gawler Church Hill Heritage Standard has not been revised.

Sub-section (a) – Roofing and rainwater goods (new)

What We Heard

- Under the 1st Dot point of 'Not supported' column in the Acceptable Standard for Principle 3.4.3(a), it is not clear if '*roof tiles where not on original building*' is a separate dot point.
- Why would 'inappropriate materials' be able to be used when they are replacing existing 'inappropriate materials'. There needs to be an explanation that if there are historic tiles, e.g. on the Anglican Church, then such tiles are appropriate for alterations and additions, but not otherwise. When 'inappropriate materials', such as aluminium roof tiles, wear out, then they should be replaced with a more appropriate materials.
- The term 'original building' should be removed from the Acceptable Standard of Principle 3.4.3(a) and there should not be an ability for Zinalume to be used in the Gawler Church Hill SHA, irrespective of whether it was the original roofing material of a building.

How We Responded

- The Acceptable Standard for [Principle 3.4.3\(a\)](#), the text relating to the 1st Dot point of the 'Not supported' column has been reviewed and revised.
- Regarding the comment on 'inappropriate materials' the text of the Gawler Church Hill Heritage Standard has been reviewed and revised, where appropriate.
- The term '*original building*' has been removed from the Acceptable Standard of [Principle 3.4.3\(a\)](#) and the use of Zincalume is not supported in the Gawler Church Hill SHA.

Sub-section (b) – Exterior walls (new)

What We Heard

- Under the 'Acceptable' column for the Acceptable Standard for [Principle 3.4.3\(b\)](#), in particular '*natural colour render (white or stone)*', white is not a natural render colour, maybe it should be '*natural light sand or stone colour*'.
- Mini orb seems to be excluded in the 'Acceptable' column for the Acceptable Standard for [Principle 3.4.3\(b\)](#), when was Mini orb first used in South Australia?
- The Acceptable Standard for [Principle 3.4.3\(b\)](#) prohibits fibre cement sheeting combined with limiting metal sheeting to small rear additions. Light material sheeting (often fibre cement) is a significant building component for 'reverse brick' construction and would limit the achievement of high energy efficiency dwellings. The Acceptable Standard also prohibits cement render but permits rendered masonry. In many circumstances determining the difference between the two requires much closer inspection than the typical viewpoint in the public realm and furthermore, rendering of fibre cement (or hebel) may also be indistinguishable.

How We Responded

- Regarding the comment that 'white is not a natural render colour', white is a natural render colour and therefore the text in the Acceptable Standard for [Principle 3.4.3\(b\)](#) in the Gawler Church Hill Heritage Standard has not been revised.
- Mini orb is not traditionally an exterior wall cladding and therefore the text in the Gawler Church Hill Heritage Standard has not been revised.
- With respect to the Acceptable Standard for [Principle 3.4.3\(b\)](#), fibre cement sheeting and cement render have been removed from this list of 'Not Supported' materials.

Sub-section (c) – Proposed external doors and windows in the view of the street

What We Heard

- The Acceptable Standard for [Principle 3.4.3\(c\)](#) specifies '*timber framed windows*', this provision is overly constraining. If you are seeking to maintain the aesthetic of the windows, then other materials that result in similar profiles to the window frames should be acceptable. Typically, the appropriate aesthetic could be achieved by uPVC and aluminium clad timber frames.
- The Acceptable Standard for [Principle 3.4.3\(c\)](#) specifies '*timber framed four-panel doors*', this provision is also overly constraining for new construction. If you are seeking to specify a particular aesthetic intent on the appearance of doors (presumably those viewable from the public domain), then it is the profile and finish that you should be specifying and not the specific construction material for the doors.
- There needs to be more control over the look of security doors in the Gawler Church Hill SHA, as they are highly visible from the public realm and can affect heritage value of the SHA.

How We Responded

- The specification for '*timber framed windows*' in the Acceptable Standard for [Principle 3.4.3\(c\)](#) only prescribes framing materials for those windows on street frontages.

- The reference to '*framing*' has been removed from the description of '*timber doors*' in the Acceptable Standard for [Principle 3.4.3\(c\)](#).
- The use of '*decorative aluminium screen doors*' in the Gawler Church Hill SHA is 'Not supported' in the Acceptable Standard for [Principle 3.4.3\(c\)](#), however wording of this category has been revised to include security doors, in order to encourage less obtrusive door designs.

Sub-section(d) – Exterior painting

What We Heard

- The comment that 'Exterior painting' is 'Not development' needs to change, surely it is 'development' if painting previously unpainted masonry? It is also detrimental that repainting seems to allow inappropriate colours.
- There needs to be greater ability to regulate the appearance of facades and to control of the colours used in exterior painting. Guidance on the painting of heritage places would assist in managing exterior painting in the Gawler Church Hill SHA. The 1998 Church Hill Management Plan discusses painting and is worth consulting.

How We Responded

- Generally, exterior painting is not defined as 'development' in a SHA and therefore the text in the Gawler Church Hill Heritage Standard has not been revised. However, there is a note in the Gawler Church Hill Heritage Standard explaining that the painting of unpainted surfaces is not supported.
- It should be noted that the painting of previously painted surfaces is not 'development', however compatible colours schemes are encouraged.

Sub-section (e) – Verandah posts

What We Heard

- The Acceptable Standard for [Principle 3.4.3\(e\)](#) specifies that only timber posts of a significant dimension (120 x 120 mm) should be used and further prohibits the usage of steel verandah posts. Since painted steel posts are indistinguishable to wooden posts (either square edged or rounded) until touched, this provision is an excessive constraint, particularly for new construction. The particular aesthetic intent could be achieved by more carefully framing this requirement.
- In addition, the Acceptable Standard for [Principle 3.4.3\(e\)](#) also allows for '*decorative timber posts, if supported by historical evidence*', which also applies to new constructions. It is noted that that the vast majority of the turned timber posts are '*decorative*'.
- The Acceptable Standard for [Principle 3.4.3\(e\)](#) also prohibits the usage of '*post shoes*'. This provision is surely a typographical error, especially when combined with the requirement for timber posts! Inspecting houses in the Gawler Church Hill SHA will identify that all the wooden verandah posts employ post shoes. If there is concern about a particular aesthetic for the post shoes, then the language in the Principle should be more specific.

How We Responded

- The Acceptable Standard for [Principle 3.4.3\(e\)](#) has been reviewed and revised in relation to what is acceptable and what is not supported for verandah posts.
- The reference to '*post shoes*' for verandah posts has been removed from [Principle 3.4.3\(e\)](#).

Section 3.5 – Ancillary development

Principle 3.5.1 – Outbuildings including carports, garages sheds, storage containers studios offices ...

Sub-section (h) – Outbuildings (garages, carport, sheds, studios, offices, ancillary accommodation ...)

What We Heard

- It is hard to see how including '*Outbuildings to not visually dominate main building.*' adds to its previous sentence that '*New outbuildings complement the scale, form, materials, site location and relationship of outbuilding development common to the vicinity*' in [Principle 3.5.1\(h\)](#).
The inclusion of '*Outbuildings to not visually dominate main building*' seems to weaken [Principle 3.5.1\(h\)](#) by allowing for buildings which may be visually inappropriate, provided they don't '*visually dominate main building*'. Presumably that is not the intention of this extra sentence. Maybe a sentence like '*is sympathetic with the appearance of the main building and does not visually detract from the character of the Area*'. The words related to pergolas in [Principle 3.5.1\(i\)](#) could also be used.
- The Acceptable Standard for [Principle 3.5.1\(h\)](#) states different front setbacks, depending on whether the building is open or enclosed. There is a need to clarify how a carport that is open on all sides, except the front facade (i.e. had a roller door), would be treated.
- The Acceptable Standard for [Principle 3.5.1\(h\)](#) does not allow buildings to be constructed on a common boundary, however there are numerous examples of such buildings within the Gawler Church Hill SHA. Is this taken into account in assessing 'development' in the SHA or will this now be a blanket rule?

How We Responded

- The reference to '[Principle 3.5.1\(h\)](#)' has been corrected to be '[Principle 3.5.1\(a\)](#)'.
- The Acceptable Standard for [Principle 3.5.1\(a\)](#) has been revised in relation to carports with street facing doors.
- With respect to the comment that under the Acceptable Standard for [Principle 3.5.1\(a\)](#) that it appears that outbuildings are not allowed on a common boundary, outbuildings are permitted where replicating an existing outbuilding footprint and setbacks.

Sub-section (i) – Pergolas

What We Heard

- The Acceptable Standard for [Principle 3.5.1\(i\)](#) allows for pergolas of certain height and area to be located in front of buildings, however a pergola should also not be located in front of building facades or where the pergola can screen important historic characteristics,

How We Responded

- The reference to '[Principle 3.5.1\(i\)](#)' has been corrected to be '[Principle 3.5.1\(b\)](#)'.
- The text of the Acceptable Standard for [Principle 3.5.1\(b\)](#) has been reviewed and revised, taking into account that a pergola should not be located in front of building facades or where the pergola can screen important historic characteristics of the adjacent building. However, decisions on pergolas in the Gawler Church Hill SHA can be made on a case-by-case basis.

Principle 3.5.2 – Fences and gates

What We Heard

- Generally, [Principle 3.5.2](#) and its Acceptable Standard wording were supported. Notwithstanding, detailed commentary was provided on the appropriateness or not of new fencing installations in the Gawler Church Hill SHA.

- There were opposing views on fences in the Gawler Church Hill SHA, with some people seeking a restoration of the era when fences were lower, whilst others sought to permit high fencing for current security concerns. However, there was a desire for lower traditional fence types that reflect heritage character of the SHA, that provides a clear line of sight to dwellings. More attention was also requested to the form and height of side and rear fencing.
- Concern was expressed about the use of roller doors and the setback of carports in the Gawler Church Hill SHA, with a preference for more sympathetic alternatives, such as tilt and panel lift doors, and greater setbacks that preserve the views of the important contributory structures.

How We Responded

- The text of [Principle 3.5.2](#) and its Acceptable Standard have been reviewed and revised, noting that the side and particularly rear fences fronting streets are part of the 19th century subdivision patterns and streetscape of the Gawler Church Hill SHA. Also, rear boundary fencing reflects the service nature of some streets and are in keeping with the character of the Gawler Church Hill SHA.
- Generally, carports should be setback behind the facade of the main buildings, however 'roll up doors' are not acceptable when in view of the street.

Sub-section (a) –Fences and gate (Replacement or new)

What We Heard

- The figure shown under the Acceptable Standard for [Principle 3.5.2\(a\)](#) is unclear. It is assumed that the boundaries in the figure are between properties and the roads, but the lack of annotation of the figure makes that impossible to ascertain with any certainty.

How We Responded

- The figure shown under [Principle 3.5.2\(a\)](#) has been redrawn with further annotation.

Principle 3.5.5 – Solar panels

What We Heard

- With respect to the Acceptable Standard for [Principle 3.5.5](#), solar panels should not be visible from the street.

How We Responded

- Under the Acceptable Standard for [Principle 3.5.5](#), some visibility of solar panels should be permitted, providing it was incidental, restricted and of low visual impact when viewed from the public realm.

Principle 3.5.6 – Rainwater tanks

What We Heard

- The Acceptable Standard for [Principle 3.5.6](#) specifies the size of rainwater tanks as '*of modest size*', which is arbitrary and provides no guidance. The arbitrary wording '*of modest size*' is 'disturbing', in light of the sensible measures being taken to support the gardens in the Gawler Church Hill SHA, that form a key element of the SHA.

How We Responded

- Under the Acceptable Standard for [Principle 3.5.6](#), the reference to size for rainwater tanks has been removed.

Section 3.6 – Land division

What We Heard

- In the opening statement of [Section 3.6](#), it was suggested to replace the description 'general pattern' with 'existing pattern'. The 'general pattern' of the Gawler Church Hill SHA is a mix of large medium and smaller allotments - allowing additional lots could be argued to maintain the 'existing pattern'.

Surely the aim of the Gawler Church Hill Heritage Standard should be to maintain the historical pattern of the Gawler Church Hill SHA and not create additional lots, as has occurred since 1998 Church Hill Management Plan and 2000 Gawler Council's Development Plan. Unless the Gawler Church Hill Heritage Standard is clear on this issue, there will be ongoing attempts to create new lots resulting in ongoing change to the character of the Gawler Church Hill SHA.

- The allotment pattern in the Gawler Church Hill SHA varies considerably, so the question arises as to what extent is the existing allotment pattern to be preserved and what infill will be permitted.

How We Responded

- The text of the opening statement of [Section 3.6](#) has been reviewed and revised.

Principle 3.6.1 – Land division characteristics

What We Heard

- While [Principle 3.6.1](#) and its Acceptable Standard relating boundary adjustments, easements or similar changes was supported, however concern was expressed about the creation of new allotments through land division. There is a lot of variability in lot sizes and spatial scale in the Gawler Church Hill SHA - surely the point of the SHA is to maintain the existing pattern so that the SHA's values are maintained. The proposed wording of [Principle 3.6.1](#) and its Acceptable Standard relating to land division is an open invitation for additional lots to be created. It was noted that at the land division stage, the issues about proposed built form scale cannot be sensibly dealt with at this stage.
- Over the last 20 years, residents and landowners in Gawler Church Hill SHA have accepted that there should be no new allotments in the SHA, until recent subdivision of the tennis court site The proposed text in [Principle 3.6.1](#) and its Acceptable Standard will seriously undermine confidence in the management of the SHA.
- Vacant allotments created by new subdivisions should have more prescriptive guidelines.

How We Responded

- The text of [Principle 3.6.1](#) and its Acceptable Standard have been reviewed and revised, noting concern about subdivision and the creation of new allotments in the Gawler Church Hill SHA.
- Existing vacant allotments have been covered off by a Land Management Agreement and were established prior to the publication of the Gawler Church Hill Heritage Standard. Any future vacant allotments will arise because of demolition and need to be treated on a case-by-case basis.

Section 3.7 – Landscape context and streetscape amenity

Principle 3.7.1 – Landscape character

What We Heard

- The Gawler Church Hill Heritage Standard should provide appropriate guidance on landscaping on public land, particularly for the three main squares and Anglican, Catholic and Lutheran Church properties. Also, guidance is required for the very significant and larger private gardens, for example stating that 'plastic grass' is not appropriate.
- The Gawler Church Hill Heritage Standard should include a list of trees of heritage value on public land, which would trigger requirements related to their removal etc. Though many of these trees are already defined as

Significant or Regulated trees, their heritage value is an important issue for the Gawler Church Hill SHA and are not currently covered effectively in the Gawler Church Hill Heritage Standard.

- Regarding the Acceptable Standard for Principle 3.7.1, in the absence of guidelines relating to work in the public realm, does Heritage South Australia have any comment to make on the scope of the Gawler Council to undertake works to footpath, roads or reserves, with or without consultation with Heritage South Australia?

How We Responded

- The text of Principle 3.7.1 and its Acceptable Standard have been reviewed and revised, to include a list of potentially important elements contributing to the landscape character of the Gawler Church Hill SHA.
- Regarding the comment about the absence of guidelines relating to work in the public realm, it is anticipated that consultation and referral of development applications will need to be made for the elements listed in the Acceptable Standard, including the replacement or upgrade of public realm kerbing, footpaths, street trees, street furniture, lighting, and works on roads, including closed roads and reserves, in the Gawler Church Hill SHA.

Section 3.8 – Demolition

What We Heard

- While Section 3.8 is supported, there are issues with consistency in citing eras/ dates of heritage value in the Gawler Church Hill Heritage Standard.

How We Responded

- With respect to citing eras/dates of heritage value in the Gawler Church Hill Heritage Standard, and in particular Section 3.8, the text has been revised to the period '1839-1925'.

Principle 3.8.1 – Demolition

Sub-section (a) – Demolition of buildings

What We Heard

- There should be a statement in the Gawler Church Hill Heritage Standard that demolition of a dwelling should be based on the replacement of a 'single detached dwelling' by a 'single detached dwelling' or the replacement of a 'detached dwelling' by an equivalent 'detached dwelling' etc., thus maintaining a similar scale and coverage of its site.
- When dealing with demolition in the Gawler Church Hill Heritage Standard, it was proposed that alteration of buildings is preferred to demolition and to maintain existing scale and density of coverage in the Gawler Church Hill SHA, noting that this proposal also supports the retention of embodied materials and energy and reduces the environmental cost of demolition and rebuilding.

How We Responded

- While the comment that a demolished dwelling should be replaced by a dwelling of a similar form was noted, the inclusion of such a provision is not within the scope of the Gawler Church Hill Heritage Standard. The Standard already includes principles guiding the scale and site coverage of any replacement dwelling.
- The proposal that the alteration of buildings is preferred to demolition was noted, but there was no change to the text of the Gawler Church Hill Heritage Standard.

Sub-section (b) – Demolition of outbuildings and dwelling additions

What We Heard

- In relation to the Acceptable Standard for [Principle 3.8.1\(b\)](#), it was suggested that the word '*confirmation*' be replaced with '*determination*' or '*confirmation by Heritage South Australia*'.

How We Responded

- The word '*confirmation*' was removed from the Acceptable Standard for [Principle 3.8.1\(b\)](#).

Section 3.9 – Conservation works

What We Heard

Principle 3.9.1 – Conservation approach

- In relation to [Principle 3.9.1](#), it was suggested that the phrase '*19th century features*' be replaced with '*historic features*' and '*not common to the style and era of the building*' be replaced with '*not occurring in the style and era of the building*'.

How We Responded

- The text of [Principle 3.9.1](#) was reviewed and '*19th century features*' was replaced with '*heritage features*'. There was no further revision of the text of [Principle 3.9.1](#), in response to this comment.