

**Geoff Underwood**  
Chair – SPPF Review Advisory Committee

14 October 2013

### **State Planning Policy Framework Review**

Dear Mr Underwood

Thank you for providing the Heritage Council of Victoria ('Heritage Council') with the opportunity to comment on the review of the State Planning Policy Framework (SPPF) for planning schemes.

The Heritage Council is an independent statutory authority and the State's main decision making body on cultural (non-Indigenous) heritage issues.

The Heritage Council understands that the review's primary purpose is to amend the SPPF in line with the new Metropolitan Planning Strategy and Regional Growth Plans. However, there is an important opportunity in the current review to ensure that the SPPF functions well as a high-level guiding document for planning and planning decision-making.

The Heritage Council recognises that the SPPF provides an important role in guiding the preparation of planning schemes and decision-making under the *Planning and Environment Act 1987*. Accordingly, the SPPF should address themes and issues that are important in guiding planning decisions across Victoria.

Included in this, the SPPF should continue to support the identification, protection and management of heritage values (be they of local, State or National significance) and advocate that the heritage values of places be understood, documented and given due consideration in planning decisions. The SPPF should also highlight the benefits of heritage conservation, including the contribution of heritage to establishing a sense of place in new or redeveloping communities, retaining a fine-grained, human scale in urban areas, and conserving embodied energy in materials.

There is opportunity for the SPPF to set out both principles and directions for planning practice (that is, the creation of planning schemes and the exercise of discretion). To do so it should recognise that:

- Cultural heritage values may be embodied in many types of places, including urban precincts, individual buildings, infrastructure systems and landscapes.
- Heritage values are held by Victoria's community/ies and that engagement with those community/ies is essential to understanding and making appropriate decisions about how to manage a place.

- Heritage values may be tangible or intangible.

The SPPF may also play a role in informing decision-making where existing heritage values may not have been formally recognised but may be identified in a planning assessment process.

*Characterising heritage in the SPPF*

The Heritage Council strongly supports the retention of protection and management of heritage values in the SPPF. However, the current structure of the SPPF does not appropriately reflect the diversity of places which hold heritage values important to our community.

*Reference to the findings and recommendations of Heritage Council*

The Heritage Council notes that the current SPPF requires that planning must consider as relevant 'the findings and recommendations of the Heritage Council'. The Heritage Council supports the retention of this existing reference. However, we propose the following alternate wording:

Planning should consider as relevant the decisions and recommendations of the Heritage Council of Victoria".

*Aboriginal heritage places*

The Heritage Council also supports the inclusion of guidance on the protection of Aboriginal cultural heritage, along the lines of the provisions already included in Clause 15.03-2 - Aboriginal cultural heritage. We recommend that comment be sought from the Victorian Aboriginal Heritage Council on the appropriate approach to this in any revised SPPF.

Once again, the Heritage Council would like to thank you for providing it with the opportunity to provide comment to the Advisory Committee.

Yours sincerely

Leo Martin  
Manager – Heritage Council Secretariat

cc. Tim Smith, Executive Director – Heritage Victoria