



6 June 2014

Australian Heritage Strategy Submissions
Heritage Branch
Department of the Environment
GPO Box 787
CANBERRA ACT 2601

Attention: Mr Nigel Routh

Dear Mr Routh,

The National Trust of Australia (NSW) makes the following comments in response to the call for public submissions on the exhibited "***Draft – A Strategy for Australia's Heritage***". The Trust has also taken into account the April 2012 Public Consultation Paper – "***Australian Heritage Strategy***" and is pleased to accept the invitation to "provide feedback on what themes, priorities and actions should be included in the final Strategy document".

The National Trust of Australia (NSW) was formed in 1945, as an organisation to address community concerns that commercial activities and government policy at that time were destroying parts of the natural and built environment which should be preserved for future generations. This concern has evolved over ensuing decades to a role of advocacy on behalf of the community, for the incorporation of environmental and heritage issues and objectives into the process of government decision-making and commercial development.

This background and the Trust's long experience in the process of heritage and environmental advocacy lead to a conclusion that the draft National Heritage Strategy (NHS), released in April, 2014 is misconceived.

The draft strategy suggests that the Australian Government should be the "leader" in environmental and heritage management. This assertion relies on a concept which suggests that governments 'lead' communities. Rather than 'leadership', what is required is wise, informed and balanced decision-making on behalf of the community. Much of the work of the National Trust, over the last six decades has been to respond to the 'leadership' initiatives of governments, in order to produce better long-term development outcomes for the natural and built environment, for the benefit of the broader community.

The draft strategy also envisages that community participation can be encouraged by providing support for local festivals and celebrations. This only addresses a small part of the community's existing participation in 'heritage conservation', entirely ignoring the role of non-government community organisations such as the National Trust. In addition, protest marches, picket lines, sit-ins and petitions are equally an expression of community sentiment for heritage conservation.

Most importantly, community access to legal representation in the judicial process has proven to be a key means for communities to have heritage values reflected in development outcomes.

The strategy treats the environment and heritage as separate concepts when they are fundamentally intertwined. One affects the other and both affect the ability of the community to engage with and



have confidence that government and commerce are acting in the interests of the greater community, rather than for sectional interests and short-term political objectives.

The National Trust of Australia (NSW) (the National Trust) believes that the community, individual heritage property owners and non-government organisations such as the National Trust and ICOMOS are carrying the major responsibility for identifying and conserving heritage places because successive State and Federal Governments have not properly resourced this work. The Australian Government should commit to true and effective support for this work through: -

- (1) higher funding and staffing levels for the Heritage Branch of the Department of Environment and Conservation and the Australian Heritage Council,
- (2) the reinstatement of federal funding for the NSW Environmental Defenders' Office, and
- (3) encouragement of the NSW Government to facilitate the statutory heritage listing of National Trust Register listed places.

Identification of our heritage is as important as its protection and conservation. An Australian Heritage Strategy must commit to ongoing research into identifying and understanding our heritage. Heritage is a continual voyage of discovery. The strategy should encourage and facilitate public and private investment in our heritage.

The National Trust of Australia (NSW) is opposed to the downgrading and/or reduction in area of existing Australian World Heritage Areas.

The National Trust urges that there be a proper Australian Government investigation of the significant part played by the built, natural and cultural heritage in Australia's tourism industry valued at \$96 billion.

The National Trust expresses its grave concerns at a "one stop shop" development approval process where essential information on heritage and environment matters will not be properly considered and/or may not be available.

The National Trust urges that the objects and principles of the Environment Protection & Biodiversity Act be upheld, particularly "to provide for the protection and conservation of heritage", the "principles of ecologically sustainable development", the principle of inter generational equity and the precautionary principle.

An Australian Heritage Strategy should articulate all areas of significance as set out in the Burra Charter and it should publicise and promote the use of the Burra Charter which defines the principles and procedures for the conservation of heritage places. It should also publicise and promote the use of the Australian Natural Heritage Charter which is based on an ethos of respect for Australia's natural heritage.

It should commit the Commonwealth to the identification, documentation, protection and conservation of Commonwealth heritage. Matters of National significance should be the responsibility of the national government and National significant items and Commonwealth owned items including 20th Century items should be identified, listed, documented, protected, conserved and where possible used by the Commonwealth.

An Australian Heritage Strategy should clearly articulate improvements to the role and funding of the Australian Heritage Council and should enshrine the independence of the Australian Heritage Council.



An Australian Heritage Strategy should recognize independent organizations such as National Trusts, ICOMOS, DOCOMOMO, Historical Societies and other conservation bodies and heritage considerations should inform all relevant government decisions. Heritage should be embedded in government policy and planning and community engagement should be embraced at every level.

Commonwealth education policies should include the recognition of the significance of training specialists in all aspects of the identification, documentation, protection and conservation of Australia's natural and built heritage. This includes skilled environmentalists, scientists, builders, ecologists, tradespeople, historians, planners, architects and archaeologists.

An Australian Heritage Strategy should include a public and private funding strategy. It should, of course, articulate practical objectives and should commit to building the capacity of government, community and industry to identify, document, protect and conserve Australia's heritage.

There are only 100 places on the National Heritage List and there is no commitment in the draft strategy to the listing of significant items or places. There appears to be a heavy reliance on the "Green Army" concept, which has not yet been formed or trained and which seems aimed at landscape works. It is highly doubtful that this programme could deliver the specialist heritage skills required in Australia.

The Australia State of Environment 2011 reports that the condition and integrity of Australia's listed heritage and indigenous cultural heritage has deteriorated. The April 2012 Public Consultation Paper – "Australian Heritage Strategy" Questions for Discussion are worth re-stating in an Australian Heritage Strategy and many of the areas identified require a research commitment.

For nearly seventy years the National Trust of Australia (NSW) has committed its limited funds and resources directly to the identification, conservation, presentation and promotion of our State's heritage in line with carefully enunciated policies and strategies which are regularly reviewed and fine-tuned.

An Australian Heritage Strategy should provide wise, informed and balanced decision-making on behalf of the community. It should aim to provide adequate levels of funding to halt the deterioration of Australia's listed heritage.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Quint', with a large, stylized flourish extending from the bottom left.

Graham Quint
Director - Advocacy