

13 June 2014

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



Australian Institute of Architects

To whom it may concern,

***A Strategy for Australia's Heritage***

The Australian Institute of Architects (the Institute) is pleased to provide feedback on the draft 'A Strategy for Australia's Heritage'.

The Institute is an independent, national professional member organisation with over 11,000 members across Australia and overseas. The Institute exists to enhance the cultural, environmental and economic well-being of the community by advancing contemporary practice and the professional capability of members, and advocating the value of architecture and architects. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

The Institute is an acknowledged recorder of noteworthy heritage places and accepts the 'Burra Charter: Australia ICOMOS Charter for Places of Cultural Significance' as the guiding principle for architectural heritage preservation. The Institute also maintains a Register of Significant 20<sup>th</sup> Century Architecture at the national as well as State/Territory level. Although these registers are not statutory, they are widely consulted by researchers and government officers.

In June 2012, the Institute made a submission to the earlier Australian Heritage Strategy- Public Consultation Paper. The Institute acknowledges progress on this issue which has now resulted in the draft 'A Strategy for Australia's Heritage'. We reiterate our submission made in 2012 (attached) and ask that it be considered again in light of the latest draft strategy as it is still relevant.

In response to the Draft Strategy for Australia's Heritage we address the following specific points:

***1. Improve National Leadership***

*Proposed Action: Explore innovative approaches to fund the long term protection and management of Australia's heritage places*

A key issue the Institute has identified is the lack of resourcing for assessing places for inclusion on heritage lists or registers. Our members report that there is a backlog of places awaiting assessment, and although this varies between the states and territories, it is also apparent at a National level. This is of significant concern, particularly for buildings from the past 20 – 50 years considered to be significant, but potentially under threat.

Our members suggest that resourcing difficulty is most obvious at the local government planning scheme level in updating local government planning instruments .

**1b. *Capture a representative National Heritage List***

*Commitment: Provide additional support over the next three years to the Australian Heritage Council to help assess our national heritage and advise on protection*

The Institute welcomes this commitment and recommends that the Australian Government needs to empower the Australian Heritage Council to enable it to provide real leadership through the promotion and dissemination of what is considered 'best practice' in order to raise the bar across the nation and recognise our extraordinary built heritage.

We also submit that the national heritage list is narrow in terms of its scope/context and needs to be expanded, in particular from the limited listing of 20<sup>th</sup> century buildings to post 1950 built heritage, including residences, urban spaces, cultural landscapes and industrial complexes.

**1d. *Contribute to international heritage standard setting and guidance***

The Institute supports this commitment, but suggests that there needs to be a transparent process to assess or support places for nomination for world heritage. While the draft strategy mentions the pursuit of national heritage and possible World Heritage listing of some specific places eg, Queen Victoria Markets in Melbourne, it expresses no rationale for this action.

**2a. *Greater heritage policy and process alignment across all levels of government***

The Institute welcomes this priority and observes that it is closely related to Proposed Action 1 '*Improve National Leadership*'. We note that the majority of heritage activity is undertaken at the state, territory and local level. The funding, resources and differing processes or structures result in very different heritage outcomes. The Institute would like to see greater leadership and resources from the Commonwealth directed to the states and territories in order to lift the quality of built heritage outcomes nationally.

The Institute also supports the proposed action to encourage partnerships between government, heritage peak bodies and the construction industry to develop appropriate reforms to green star building schemes for existing heritage buildings. In its earlier submission the Institute pointed out that adaptive re-use is also of significance for sustainability when embodied energy in the materials and the construction of buildings is accounted for. It is increasingly being recognised that measuring energy efficiency should take account of the energy used in construction as a whole of life consideration.

We assume that the use of the term 'green star' in the draft strategy is a catch-all phrase for all energy efficiency ratings schemes, as we note that the Green Building Council of Australia's green star tool already captures adaptive re-use of buildings, as well as encouraging use, retention and celebration of buildings with cultural heritage.

2b. ***Building Heritage capacity through workforce support, education and training***

The Institute recommends that the proposed actions be expanded to include more support and promotion of tertiary level education for heritage practitioners. Educational opportunities in the heritage field are often not sustainable in the limited local context, yet are available overseas. Funding assistance for overseas training would help to make these skills available in Australia.

We also query the Green Army program and to what extent if any it might play a role in heritage conservation. We note that heritage conservation and adaptation practices in the built environment requires detailed knowledge, adequate supervision and training and cannot be considered 'vocational training' unless it links participants into trade or professionally-based education pathways.

3a. ***Creating incentives to care for our heritage***

In our 2012 submission the Institute called for taxation incentives to promote the conservation and maintenance of heritage listed buildings (equally applicable to any heritage listed asset). We reiterate this call as a valuable incentive to help assist the individual owners of our heritage listed assets to actively maintain them.

The Institute supports the development of an Australian Heritage Strategy and believes that the importance of our country's built heritage needs to be more strongly recognised within the strategy.

I would be happy to discuss this submission if needed.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Parken', with a long horizontal flourish extending to the right.

David Parken, LFRAIA  
Chief Executive Officer