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Ms Fiona Moore  
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Dear Ms Moore

### **Five Year ACT Heritage Strategy Discussion Paper 2016-2021**

Thank you for the opportunity to comment on the Five Year ACT Heritage Strategy Discussion Paper 2016-2021. I provide this letter as a submission on behalf of Australia ICOMOS.

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 600 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia. We have a particular interest in Australia's world heritage sites.

Australia ICOMOS welcomes the development of the first heritage strategy for the ACT. A heritage strategy confirms an understanding that heritage is important to the ACT community, and provides a vision for the role of heritage for the ACT. A heritage strategy demonstrates the ACT government's commitment to the Territory's heritage and its role in expressing the Territory's sense of identity. In doing so, the heritage strategy ensures that the Territory's unique heritage—natural and cultural (Aboriginal and historic), is central to all planning, development and tourism decisions.

The proposed Five Year ACT Heritage Strategy 2016-2021 will also provide the opportunity for the ACT Government to show leadership in the protection and celebration of the Territory's heritage. Such leadership can demonstrate that cultural heritage is not 'old' and to be dismissed as irrelevant, but a celebration of the Territory's story from past to present. That story includes past and present ways of life, visionary planning and design for a new city, the capital of a new country, the building of a new and strong society from those who have come from throughout Australia and the world—the creation of Canberra, and the Territory as it is today. In its commitment to heritage, the strategy can challenge the view held by some that heritage is a barrier to change and development, instead providing a platform to convey how continuity takes place with change and growth.

A heritage strategy also permits the ACT Government to present its dedication to best professional heritage practice according to Burra Charter principles (accepted at all levels of government throughout Australia) and through proactive and effective application of heritage legislation.

Australia ICOMOS' role is as a national committee of the leading international professional organisation for cultural heritage places. Therefore, our emphasis in this submission is on the historic and Aboriginal heritage in the ACT, not its natural heritage. We note however, that many natural landscapes and natural features are also parts of cultural heritage, often but not only, because they meet the aesthetic and / or social value heritage significance criteria. Equally, in the following recommendations, Australia ICOMOS has focussed on place, whether an extensive landscape or a small structure. However, Australia ICOMOS considers these recommendations apply equally to movable heritage and intangible cultural heritage, especially these forms of heritage connected with place.

Australia ICOMOS, in making the comments attached, seeks to facilitate that the final developed Strategy will meet the highest standard in its aspirations and obligations to identify, protect and manage the heritage of the ACT.

Thank you again for your consideration of the views of Australia ICOMOS in this important issue.

Yours faithfully



**MS KERIME DANIS**  
**President, Australia ICOMOS**

## Comments on Five Year ACT Heritage Strategy Discussion Paper 2016-2021

### *Re-Imaging heritage in the ACT*

#### **A Vision for Heritage in the ACT**

Australia ICOMOS recommends that the ACT Heritage Strategy begins with a vision for the ACT heritage that outlines the importance of heritage for the ACT, including:

- The vision for the ACT's heritage can build on ideas flagged in the Discussion Paper as stated provide the ACT government to better communicate:
  - the reasons for valuing and conserving our heritage places and objects;
  - the roles and responsibilities of the government, Heritage Council and other peak bodies; and
  - the implications of heritage listing.
- There is also opportunity to further enhance the quality of existing information available to the public on heritage matters, and to further broaden means of engagement with heritage.
- The vision can also highlight that heritage is no barrier to development and its conservation can lead to an enhanced and enriched experience of the urban and rural environment experiences for both the local community and visitors. Heritage places can provide a deep and inspirational sense of connection to community and landscape, to the past and to lived experiences. They are historical records that are important expressions of Australian identity and experience. Places of cultural significance reflect the diversity of our communities, telling us about who we are and the past that has formed us and the Australian landscape. They are irreplaceable and precious. Heritage listing can be a financial benefit to owners and the wider community, and contributes to a greater social and cultural capital.
- This vision needs to be couched in general inspirational terms, but grounded also. The vision needs to stress the importance of a sense of cultural continuity through physical evidence linking people with place, a sense of place and of pride, as the ACT through history to become the national capital with important planning and Garden City landscapes.
- Australia ICOMOS recommends that the ACT Government show vision and leadership through the establishment of a Minister for Heritage in addition to a Minister for Planning. This follows the Burra Charter principle of ensuring that identification is kept separate to management decisions regarding development rather than being influenced by future aspirations.

### *Establishing a long-term vision for the ACT Heritage Register*

Australia ICOMOS supports the concept of a long-term vision for the ACT Heritage Register to ensure it remains current, relevant, credible and of the highest quality in terms of content.

#### **Identification**

In regard to representation and possible under-representation, it is recommended that:

- **Thematic Studies.** An early and comprehensive identification of the ACT's cultural heritage based on regional / landscape and thematic studies to recognise the richness and diversity of the ACT's story. It is essential that such identification processes happen early, well ahead of any proposed development changes to any area of Canberra, in order that any identified or potential heritage places and values can be included in the planning for such developments.
- **Gap Analysis.** The identification process applies a gap analysis using comprehensive historic themes to identify which aspects of the ACT's story, both Aboriginal and historic—settler and as the national capital, are not represented in the ACT Heritage Register. Australia ICOMOS understands that ACT Heritage developed draft historic themes, but if not available,

recommends as an initial template the Australian Historic Themes (Australian Heritage Commission 2001a, b) for this identification process.

- **Use of Heritage Grants.** A commitment to proactive area and thematic studies needs to be a priority in the Strategy. Australia ICOMOS notes that priority topics for the ACT Heritage Grants are an established practice, and suggests that dedicated funding within this grants scheme could be channelled to ensuring a focussed identification of heritage that is currently not recognised, or insufficiently researched.
- **Aboriginal Heritage.** A commitment to a clear understanding that the 2014 amendments to the ACT *Heritage Act* 2004 regarding Aboriginal heritage that emphasises that all Aboriginal places and objects are seen as heritage, includes early identification and decisions about its protection with the representative Aboriginal organisations that their heritage remain protected in situ when wanted.
- **Early Community Consultation.** A commitment to engaging and communicating with the relevant community groups (see Discussion Paper's topic *Stakeholder engagement and communications*). It is essential to recognise that the ACT's heritage is the heritage of its society, and the individual community and cultural groups that make up the ACT society. For this reason, Australia ICOMOS urges a wider and early consultative role by government with the community about what it sees as its heritage as well as what changes may effect that heritage, its contexts and settings.
- **Inclusion of Heritage Landscapes.** A commitment to landscapes in the ACT, both urban and rural, which are not necessarily clearly referenced in the historic themes. The setting of the national capital, its early urban design phases, developing a strong 'sense of place' is known to be highly valued by communities in the ACT, as well as part of Australia's national heritage. Although the heritage of national land is not under the Territory's jurisdiction, it is recommended that a commitment to working with and respecting the interface between national and Territory heritage layers is included in the strategy together with a means of undertaking such cooperative conservation. [

### Criteria and their Application

Australia ICOMOS also applauds the ACT government's adoption of the HERCON heritage significance criteria in the 2014 amendments to the ACT *Heritage Act* 2004. In doing so, we make the following recommendations:

- **Representativeness.** The discussion paper commits to an inclusive understanding of the heritage criteria in a revised ACT Heritage Assessment Policy, such as in the case of the criterion related to 'representativeness' (Criterion d). Some recent rejections of heritage nominations imply that the heritage assessment process regards having one example of a place representing a type of place is sufficient, despite the Policy stating that a being a 'good example' suffices to be entered in the ACT Register. The former recognition of 'representativeness' including all 'good examples' that come over the significance threshold is seen in the many Garden City precincts in the ACT Heritage Register, and can therefore be more broadly applied to other types of housing or places in the ACT.
- **Social Value.** The discussion paper commits to an understanding of 'social value' (Criterion g), or also aesthetic value, that is in keeping with practice in other Australian jurisdictions. It is unclear why the HERCON criterion g term 'a particular community' was amended by the ACT to 'the ACT community', which is now understood to require the entire ACT society have associations with that place. The HERCON meaning is applied elsewhere in Australia. The requirement of 'the ACT community' risks highly valued local heritage places being overlooked.
- **Local significance.** The discussion paper commits to recognising 'local heritage' in the ACT. The 2015 Heritage Assessment Policy has raised the level of significance for heritage protection in the ACT, now indicating that only 'Territory heritage' is to be entered in the ACT

Heritage Register. This is a rejection of the former practice of including this level of heritage in the Register given the ACT does not have local governments. Prior to this 2015 Policy, this practice was widely accepted and understood, including by HCOANZ and the former COAG body, EPHC. The current Policy results in 'local' / neighbourhood heritage being endangered as it has no protection. One option is for the ACT government to have the Strategy commit to a greater recognition and emphasis for 'local heritage and values' in the ACTPLA Neighbourhood Plans (ACTPLA

[www.planning.act.gov.au/tools\\_resources/legislation\\_plans\\_registers/plans/Heritage](http://www.planning.act.gov.au/tools_resources/legislation_plans_registers/plans/Heritage)

*Guidelines* that there are places that have no conservation guidelines, or that others may need review and revision.

- **Heritage Context, Setting and Buffer Zones.** Australia ICOMOS recommends that the strategy make clear commitments to the development of guidelines appropriate to the significance of the ACT's heritage. This includes understanding heritage registered places (and other forms of heritage) in their context and setting (see Burra Charter Article 8), and taking into account their condition, zoning, and available resources. In doing so, the process of developing conservation management policies and plans for these places that are developed according to the significance of that heritage, is seen as a necessary to understand how to protect the relevant heritage values.

### ***Stakeholder engagement and communications, Supporting heritage property owners, and ACT Government-owned heritage assets.***

Australia ICOMOS recommends the following conservation aspects be included in the strategy:

- **Conservation Policy.** A commitment to the development of up to date conservation development guidelines or Conservation Management Plans (CMPs) for all heritage places, whether privately owned or in public ownership managed by the ACT government. Such guidelines or plans to be developed with stakeholder and community input and include policies and guidance to ensure the conservation of identified heritage values. This may include the ongoing role in decision-making by relevant community groups that have associations with the place.
- **Conservation of Setting.** A commitment to including in the conservation guidelines or CMPs recognition of the cumulative impact for a heritage place (not only precincts as mentioned in the Discussion Paper), particularly on the context of the heritage place, from its setting or landscape to 'buffer zones', height levels, overshadowing effects, and the application of the Historic Urban Landscape (HUL) guidelines to the Canberra's urban landscape, including 'the fit' with the national heritage landscapes.
- **Local Character and Sense of Place.** In regard to 'local level' heritage (which is currently not included in the ACT Register) a commitment to ensuring that the local heritage values and 'sense of place' is fully recognised and included in the development of neighbourhood plans and streetscape character.
- **Free Heritage Advice.** A continuation of the free heritage advisory service program for heritage owners about the ongoing management of their heritage property and conservation of heritage values during developments.
- **Heritage Skills.** A commitment to fostering relevant skills in heritage related trades, including in the CIT Building Design course, as well as short courses/seminars and access to heritage and practical best practice conservation information online and by other means.

### ***Monitoring and Reviewing Heritage***

Australia ICOMOS recommends that a regular and expert monitoring program is established and the discussion paper strongly indicates:

- a commitment to funded and expert-based monitoring program that reports on the condition and potential threats to the heritage values of the place, and of the conservation policy and plan for that place, as well as including the involvement of relevant community groups that have associations with the place.
- a commitment to recognising of the context of the heritage place to any proposed changes, including its setting or landscape, including 'the fit' with the national heritage landscapes
- a commitment to regular reporting on ACT's heritage and issues related to the comprehensive identification, monitoring results, and management issues, that this data be included in the regular ACT State of the Environment reporting, and the necessarily evidence-based recommendations of this reporting be used to be acted on to produce new policy.

### ***Providing opportunities for growth, development and adaptive reuse***

Australia ICOMOS recommends that the strategy include:

- early consideration of conservation guidelines or CMPs for heritage before any planning for change or development is undertaken, including in the setting or in view lines of heritage places.
- Commitment to involvement of relevant community or people with close associations with heritage in the process of planning development or changes.

Australia ICOMOS commends the following examples of successful heritage protection and continuity with change:

- the Whitley Houses, such as on Canberra Avenue, Griffith (ACT Heritage Register: [www.environment.act.gov.au/\\_\\_data/assets/pdf\\_file/0007/148381/156.pdf](http://www.environment.act.gov.au/__data/assets/pdf_file/0007/148381/156.pdf)) where adjacent development was designed in sympathetic style.
- the Yarralumla Nursery with its award winning CMP, that has been acted upon allowing changes to fabric to enable conservation of cultural significance of the use of the place. Enhanced Nursery operations are now allowing plant propagation to conserve heritage landscape of Sherwood Homestead area. Interpretation at Nursery open day 2015 resulted in wide community engagement and additional information about its history. (ACT Heritage Register [www.environment.act.gov.au/\\_\\_data/assets/pdf\\_file/0008/195443/296.pdf](http://www.environment.act.gov.au/__data/assets/pdf_file/0008/195443/296.pdf))
- the Kingston Powerhouse Historic Precinct, now the Canberra Glassworks now adaptively reused for a new activity which relates to the former use of different internal areas.

### ***Interpreting our stories.***

Australia ICOMOS commends the excellent and far reaching interpretation work undertaken through the Canberra Tracks and Centenary Trail programs, as well as the annual ACT Heritage Festival. The strategy should build on these programs to provide further historic and heritage information and reasons for heritage identification and conservation since a greater understanding of heritage within both government and the wider ACT community will assist heritage conservation overall.

- A commitment to compile easy and comprehensive access to online data about ACT heritage, including grey literature reports and historic photos.
- A commitment to make the current ACT Heritage Register more accessible and user friendly with greater search facility not requiring knowledge of precise name of registration or suburb location.