26 September 2003

Non-Urban Study Steering Committee
c/- ACT Bushfire Recovery Taskforce Secretariat
[sent by email to: NonUrbanStudy@act.gov.au]

Dear Committee,

Shaping Our Territory: Options and Opportunities for Non-Urban ACT

Australia ICOMOS welcomes the opportunity to comment on the above document, dated August 2003.

Australia ICOMOS is Australia’s leading non-government heritage professional organisation (see attachment 1).

Our principal recommendation is that the Committee’s final report should recognise and take account of cultural heritage as a legitimate form of land use in its own right.

We believe that the Non-Urban Study Steering Committee should give consideration to the inclusion of cultural heritage values in Part Two of the report (Land Uses and Activities). This would allow for the recognition of the important opportunities, obligations and constraints associated with the history and heritage of the Territory in the same way that natural, social and economic values are considered.

A significant number of the many heritage places formally recognised on both the ACT Heritage Places Register and the Commonwealth Register of the National Estate are located in the non-urban areas of the ACT. These places include:

- Aboriginal places and sites, important to the local Ngun(n)awal communities and significant for their ability to address important questions about the ways in which traditional Aboriginal people lived in the region before and since white settlement;
- Historic heritage places that help to tell the more recent history of Canberra and the region, including Lanyon and the Lanyon Bowl, Mugga Mugga, the Cotter pumping station and many heritage places in Namadgi National Park and Tidbinbilla Nature Reserve; and
- Aboriginal and European cultural landscapes with important spiritual, social and aesthetic values.

Australia ICOMOS does not believe that cultural heritage is, or should necessarily be, an exclusive land use. Although there are likely to be some special places and circumstances that may preclude other uses in order to protect significant cultural values, Lanyon demonstrates that cultural heritage, pastoralism and tourism can all exist side by side.
We believe that by failing to identify cultural heritage as a Land Use in Part Two there is significant risk that:

1. Proposals for new uses and activities may be prepared in ignorance of the heritage values applying to a particular place; and

2. The ACT Government agencies with heritage management responsibilities will be forced to forever react to advanced proposals instead of being proactively engaged in their development from the beginning.

Australia ICOMOS recognises the report’s notion at point 1 that there might be “…greater flexibility beyond traditional broad acre grazing…” for rural leases, and that that may include horticulture, viticulture and agro-forestry. We would urge that such decisions about changing land use should only be made after taking heritage places and values into account, according to the principles of the Burra Charter. For example, the heritage significance of the Lanyon Bowl includes aesthetic values, that depend on the retention of the pastoral landscape, without urban or other agricultural intrusions.

The report’s failure to identify the issue of cultural heritage also risks giving the impression to lessees and potential developers that cultural heritage is not a value with potential as a land use, and that developments in the Territory’s non-urban areas do not need to take such heritage into account. For example, it is not sufficient to simply identify the Lanyon Bowl as an area with special controls under the National Capital Open Space System (page 12). The constraints and the opportunities that such cultural heritage places provide should be clearly recognised in the main body of the report.

Point 2 (above) is a problem too often encountered in heritage administration — the heritage “tick box” being seen as something to deal with only at the end of a planning process when many of a project’s main features are so far advanced that little change is possible.

Through the bushfire recovery process there is a great opportunity for the ACT to be seen as a leader in heritage land use planning — beginning with the Non-Urban study.

Yours sincerely

Kristal Buckley
President

*The Burra Charter (Australia ICOMOS Charter for Places of Cultural Significance) 1999.*
Australia ICOMOS

The International Council on Monuments and Sites (ICOMOS) is a non-government professional organisation primarily concerned with the philosophy, terminology, methodology and techniques of conservation for places of cultural heritage significance. Formed in 1965, with national committees in over 100 countries, over 20 International Scientific Committees devoted to specific aspects and themes of heritage conservation, and its International Secretariat in Paris, France, ICOMOS is closely linked to UNESCO to which it provides general advice on cultural heritage conservation. More particularly ICOMOS is a statutory advisory body under UNESCO’s World Heritage Convention with responsibility to assess cultural nominations to the World Heritage list, as well as provide monitoring advice on the management of places on the list.¹ (ICOMOS website: www.icomos.org)

Australia ICOMOS is a national committee of this international body and was formed in 1976. It has been particularly active in the development and promotion of the philosophy, standards and practice of cultural heritage conservation in Australia, acting as a national and international link between public authorities, institutions and individuals involved in the study and conservation of all places of cultural significance. Its major achievement has been the Burra Charter (the Charter for Places of Cultural Significance) which has become the Australian national standard for conservation (Australia ICOMOS 2000 and on website). The Charter has also achieved widespread international acclaim.

Australia ICOMOS has a membership of about 400 heritage practitioners from a wide range of disciplines dealing with place conservation, including archaeologists, architects, geographers, historians, heritage managers, planners and others. It carries out substantial national programs and participates in the work of international ICOMOS. Internationally, Australia ICOMOS members are represented on most of the International Scientific Committees and attend the triennial General Assembly and associated conference. Currently, Australia ICOMOS supports an Australian member, elected in her own right, as Vice President on the international ICOMOS Executive Committee, the third Australian to have held such a position.

In Australia, our members participate in a range of activities including site visits, training, conferences and meetings, and Australia ICOMOS has a website (www.icomos.org/australia), regular email news service, and journal, Historic Environment. Australia ICOMOS also has an advocacy strategy commenting on government heritage policies, legislation, committees of inquiry and some conservation issues, including world heritage. Australia ICOMOS is currently Chair of the Heritage Cultural Heritage Forum held by the federal Minister for the Environment with various cultural heritage non-government organisations, which meets twice a year on cultural heritage issues.

¹ the two other advisory bodies under the World Heritage Convention are ICCROM and IUCN