12 November 2003

Heritage Directions
c/- Heritage Branch
Department of Environment & Heritage
GPO Box 1047
Adelaide, SA 5001
[sent by post and by email to: angas.hamish@sau.sa.gov.au]

Dear Heritage Branch,

**Heritage Directions: A future for built heritage in South Australia**

Australia ICOMOS welcomes the efforts of the South Australian Government to strengthen the State’s heritage management system through a broad consultative process. We are therefore pleased to take the opportunity to comment on the *Heritage Directions* document, and offer our assistance in the future decisions arising from this process.

**Australia ICOMOS**

Australia ICOMOS is Australia’s leading non-government professional organisation for cultural heritage. Australia ICOMOS is the national committee of the International Council on Monuments and Sites, a non-government professional organisation primarily concerned with the philosophy, terminology, methodology and techniques of cultural heritage conservation. Internationally, ICOMOS works closely with UNESCO, and acts as UNESCO’s principal advisor on cultural matters related to world heritage.

In Australia, we have a nation-wide membership of over 300 practitioners from a wide range of disciplines, working in all facets of the understanding and protection of Australia’s cultural heritage. Australia ICOMOS has been particularly active in the development and promotion of the philosophy and standards of practice for cultural heritage conservation. The *Burra Charter (Australia ICOMOS Charter for Places of Cultural Significance)* has become the Australian national standard for heritage conservation. We therefore have a considerable interest in the matters raised in the *Heritage Directions* paper.

Attached to the posted copy of this submission are several documents which we believe may be pertinent to the issues raised in the *Heritage Directions* paper – the *Ethical Commitment Statement for ICOMOS Members* (adopted by Australia ICOMOS, November 2002); the *Australia ICOMOS Cultural Heritage Places Policy*, which outlines much of the philosophy and general policy direction underlying the points raised in this submission; and the ‘Burra Charter process’ flow chart which provides a conceptual basis for reviewing and improving the processes of heritage conservation.

**General Points**

The ‘vision’ outlined in the paper is supported, as are most of the broad ‘directions’.
During this year alone, Australia ICOMOS has been actively involved in reviews/revisions of heritage legislation and/or strategies for the Commonwealth Government and several State and Territory Governments. Each of these processes has looked to improve aspects of heritage management systems, and there are many points of common concern.

We feel that more could be done to share the experiences and approaches taken by Australian Governments, and urge South Australian officials to discuss the issues raised in the *Heritage Directions* paper with their inter-state colleagues (in addition to further engagement with communities, cultural heritage organisations and heritage practitioners).

### Key Points

We have not attempted a detailed critique of the *Heritage Directions* paper, but instead seek to briefly raise five key points arising from our consideration of the many issues raised in the paper.

1. **Scope of the *Heritage Directions* document**

   We question the decision to limit the scope of the document to South Australia’s ‘built heritage’. In our experience, the issues and problems discussed in the paper do not limit themselves to ‘built heritage’, and it is rarely the case that the values of heritage places are limited to their architectural significance and/or fabric alone. Such a focus will almost certainly be at odds with community understanding of ‘heritage’; and best practice values-based management of cultural heritage places (as outlined in the *Burra Charter*) is not aided by this kind of arbitrary limitation.

   While the desire to focus and limit the subject matter under consideration is superficially appealing, we consider it unlikely to result in an adequate basis for implementing change. In progressing these issues beyond the *Heritage Directions* paper, it is recommended that policy development, legislative change and organisational reform be directed to all the values and manifestations of the State’s cultural heritage.

2. **Providing for appropriate management of local and State heritage items**

   Creating an integrated system for the management of heritage places of local and State significance is a substantial challenge experienced in all Australian States and Territories, and there is clearly more than one possible approach.

   It is essential that systems for heritage identification and management are effectively integrated with broader land use management systems (including development approvals).

   The proposal to incorporate both State and local heritage items in a single Register is supported as one component of a larger integrated package of mechanisms to promote the effective and timely consideration of heritage within planning processes.

   However, the possibility of transferring decision-making in relation to items of State significance to local governments is not supported. A well functioning heritage system should ensure that there is a strong link between decision making at the local and State levels, with the State Government establishing the identification, assessment and management framework (including significance criteria and thresholds).

3. **Promoting Best Practice**

   Australia ICOMOS is concerned with the articulation and promotion of best practice standards in all areas of cultural heritage management. We look particularly to Government agencies to support and advance best practice in all aspects of their work, and urge the South Australian Government to ensure that this is part of the mission of the Heritage Branch and the proposed Heritage Council.
In terms of the State-wide heritage management system, we believe that the Burra Charter ‘process’ (which is attached to the posted copy of our submission) provides the basis for establishing sound approaches for both State and local heritage items.

A central tenet of this process is the clear separation of decisions concerning significance (or the heritage ‘values’ of places) from decisions concerning management (including both conservation measures and interpretation, and also changes to fabric, setting or use of the place).

4. Capacity building, resources and incentives

The best legislation will not, by itself, deliver the best heritage outcomes. While community discussions of heritage management systems inevitably focus on statutory arrangements, this is only one part of what is required to achieve the desired vision for cultural heritage. Of equal importance are non-statutory elements such as Government leadership and commitment, resourcing, and capacity building (particularly for local government authorities).

We note with interest the proposal to establish a State Heritage Council. This is broadly consistent with the approaches adopted in other Australian States and Territories, and is supported. In establishing the composition of the Council, it is imperative that a sizeable proportion of the Council membership be appointed on the basis of substantial heritage expertise. The Heritage Council should be the principal advisor to Government in relation to heritage matters, and should also have a broad advocacy and communication role in addition to its specific responsibilities for the Heritage Register.

The issue of financial incentives for heritage conservation is an area which requires intergovernmental cooperation and information sharing. We therefore support the current work by the Environment Protection & Heritage Council as part of the National Integrated Heritage Policy initiatives. We urge Governments to work toward the timely completion of this work, and to ensure a high degree of inter-governmental cooperation in its implementation.

Ultimately, the issues raised in relation to specialist training and education must also be addressed through a well coordinated and cooperative national strategy. The initiatives suggested in section 5.7 should augment the national provision of the training and education needs of a sustainable heritage conservation ‘industry’ for Australia.

5. Management of State Government-owned Heritage Assets

We note references in the paper to the management of State-owned heritage properties. The discussion of the need for monitoring is supported, and should become a cyclical element of the Government’s own adherence to best practice management approaches.

South Australia is fortunate to have significant heritage properties in public ownership, although it is recognised that this creates substantial challenges for the Government. In determining a sustainable future for these heritage places (which provides for their long-term conservation), there are several worthy models established by other States and Territories which should be examined (including the establishment of State-based heritage property management authorities).

We recommend that the South Australian Government develop guiding principles and procedures which ensure that all management policies (including asset disposals in some instances) are clearly and transparently based on a comprehensive understanding of all the heritage values of Government-owned assets (as outlined in the Burra Charter). In the specific instance of asset disposals, we recommend consideration of the material submitted to the Commonwealth Government by the National Cultural Heritage Forum.

Next Steps

The Heritage Directions paper does not indicate what the next steps in this process will be. As stated at the start of our submission, we urge the South Australian Government to continue to
involve community and NGO interests. The experience of what works and what doesn't should be generously shared between the Australian States/Territories, using existing arrangements through the Heritage Chairs & Officials, and Environment Protection & Heritage Council.

Australia ICOMOS is very interested to assist with the further consideration of these matters. Please contact us should a further opportunity arise.

Yours sincerely

Kristal Buckley
President

cc. Mr Alan Holmes, Chief Executive, Department of Environment & Heritage
    Hon. John Hill, MP, Minister for Environment & Conservation