



Five Year ACT Heritage Strategy 2016 – 2021

Email: www.environment.act.gov.au
For attention Fiona Moore (A/g Manager)

The Inner South Canberra Community Council (ISCCC) appreciates the extension of time to enable an initial response to the Five Year ACT Heritage Strategy 2016 – 2021, launched by the Minister for Planning and Heritage some weeks ago. The ISCCC notes that the government

is seeking ... input to the development of a new Five Year ACT Heritage Strategy 2016-2021...[which]... is intended to set a clear direction and framework for the recognition, protection, conservation and promotion of our heritage places and objects for a five year period from the date of its commencement.

The ISCCC includes all the inner south area of Canberra extending to Oaks Estate in the east and Yarralumla at the western edge of Lake Burley Griffin. The committee of the ISCCC represents all the active residents' associations and groups in these suburbs and is prepared to give voice to residents beyond the urban fringe. Other affiliated community groups are also able to seek representation through the ISCCC.

This area of the city is situated within the Limestone Plains. The valley has an ancient aboriginal history which is unknown to the majority, and a colonial overlay which was severely compromised when the Limestone Plains were chosen as the site of the National Capital. The planned layout of the inner south dates from the 1920s and the area is home to the majority of Canberra's major national institutions. These older suburbs display a distinctive character widely identified as Garden City Planning. The planning layout, the treed landscape and the pattern of development is much valued.

Prior to the introduction of self-government in 1989, the National Capital Authority produced a series of guidelines with the intent of protecting the character of the older suburbs while enabling inter-generational growth and change (see PPN5, PPN6). The Garden City suburbs were identified as being of Territorial Significance. In addition,

certain specific discreet precincts within these areas were identified and nominated for heritage protection at Commonwealth Government level (e.g. Canberra's earliest public housing development, section 2 Griffith).

In the early 1990s, the ACT Heritage Register was established and included as an appendix to the Territory Plan. Residents of various suburban precincts within the Garden City suburbs were informed that their precincts were being considered for inclusion on the ACT Heritage Register. Subsequently, after extensive consultation with residents and professionals in the field, a number of Garden City Precincts were entered into the Register. The heritage protection afforded to these precincts is an acknowledgement of the intrinsic value of these predominantly low-rise residential areas.

The ACT Heritage Register remained part of the Territory Plan until 2004. Then, the ACT Heritage Act 2004 was signed into law and the ACT Heritage Register was excised from the ACT Territory Plan. Subsequently, there were some significant changes to planning laws, in particular, the Planning and Development Act 2007 and Planning and Development Regulation 2008.

The Marshall Report 2010, which focused on heritage protection within the ACT in view of these changes, contained 111 recommendations to government. The report acknowledges and responds to expressed **concerns about the loss of original heritage fabric and the problems of compliance**. In the years since this report was presented to the Minister these concerns have heightened. The links between the Heritage Act 2007 and the Planning and Development Act 2007 continue to appear weak, at best.

Members of the ISCCC have long expressed **concerns about the weak links between the Heritage Act 2004 and the Planning & Development Act 2007**. Heritage Council meetings and deliberations are not open to the public and records of meetings are not published; the Heritage Council Taskforce apparently makes **decisions** about development applications **in isolation from community input** during the public comment period; most development applications involving heritage listed properties now only trigger **minor merit track notification**. There is no information available concerning **audits** in relation to the outcomes of these changes to decision making. Furthermore, there is “**a significant backlog of nominations awaiting assessment**” (Five Year ACT Heritage Strategy 2016 – 2021 Discussion Paper page 9) and the **nomination process has become more onerous**, especially in the case of an urgent application.

Meanwhile, developments within Heritage Precincts have appeared, in some cases, to degrade heritage fabric. In extreme cases, dwellings have been almost completely demolished and rebuilt. This phenomenon, referred to as **façadism**, has been capturing the attention of experts and concerned citizens in Australia and overseas. In at least two of the heritage precincts in the Inner South retention of the original built fabric is not now required.

As Canberra's population expands and 21st century issues around environmental degradation and the need for sustainable development impact our society, there is growing community support for high quality urban intensification in key areas; along major traffic routes, adjacent to shopping centres, and in town centres. Urban intensification is leading to significant changes within local communities. And, in some instances, these changes are causing detriment to the ever decreasing number, proportionally, of heritage listed properties predominantly located within Heritage Precincts.

The ISCCC notes that community groups comment that it is increasingly difficult to participate in the process of identifying, protecting and valuing the heritage fabric of this city. Yet, it is to these very groups that individual residents often turn for advice and support. Furthermore, community involvement is exactly what promotes understanding, respect, and protection of heritage fabric. **Community groups are more than just "interested parties", they are a key component of the heritage process.**



Finally, the ISCCC supports the written responses and expressed concerns of member associations i.e. Oaks Estate Progress Association, Kingston Barton Residents Group and the Yarralumla Residents' Association as well as the Walter Burley Griffin Society, the Guardians of Lake Burley Griffin, the Canberra & District Historical Society and the Friends of the Albert Hall.

The ISCCC would welcome the opportunity to work collaboratively with government during the development of the Draft Five Year ACT Heritage Strategy 2016-2021.

Yours sincerely,

Anne Forrest
Acting Chair
Inner South Canberra Community Council
info@isccc.org.au

15th April, 2016