

**Submission
No 28**

INQUIRY INTO REVIEW OF THE HERITAGE ACT 1977

Organisation: Place Management NSW, DPIE

Date Received: 24 June 2021



The Hon. Don Harwin MLC
Leader of the Government in the Legislative Council
Special Minister of State
Minister for the Public Service and Employee Relations,
Aboriginal Affairs, and the Arts
GPO Box 5341
Sydney, NSW, 2001

24th June 2021

Attention: Mr Stewart Smith – Director Committees, Standing Committee on Social Issues

socialissues@parliament.nsw.gov.au

Dear Mr Smith

RE: Review of NSW Heritage Legislation by the Standing Committee of Social Issues, April 2021

Placemaking NSW, is part of the Place, Design and Public Spaces Division within the Department of Planning Industry and Environment and comprises of the three legal entities: Place Management NSW; Sydney Olympic Park Authority; and The Hunter Central Coast Development Corporation. All three agencies own and manage key state significant precincts and state significant heritage assets for the NSW State Government.

The Design Integrity Unit, Placemaking NSW (formerly Strategic Planning and Heritage) provides expert in-house advice and regulatory management for works and activities that effect design, heritage, planning and archaeology for all three agencies and currently hold a delegation from Heritage NSW for the management of items held on our Section 170 Heritage and Conservation Register under the Heritage Act.

The Design Integrity Unit are pleased to provide the attached draft suggestions by way of submission for the Review of the NSW Heritage Act 1977, and provide this in response to the April 2021 Discussion Paper *Review of NSW Legislation by the Standing Committee of Social Issues April 2021* prepared by Heritage NSW and as invited by the Standing Committee on Social issues on how heritage can be better managed and protected in NSW, the effectiveness of the Heritage Act and the NSW heritage regulatory system, along with heritage aspects of the Environmental Planning and Assessment Act 1979.

Please don't hesitate to contact me should you require any further information, or, my Senior Heritage Managers, Miriam Stacy, by email miriam.stacy@property.nsw.gov.au or Wayne Johnson, by email wayne.johnson@property.nsw.gov.au who are available and will be pleased to assist.

Yours sincerely

Anita Mitchell
Chief Executive Officer
Place Management NSW

And Chief Executive, Placemaking NSW

Design Integrity Unit Response to NSW Heritage Act Review – Draft for Discussion

Background

The NSW Government is inviting community discussion on how heritage can be better managed and protected in NSW. The review will look at the effectiveness of the Heritage Act and the NSW heritage regulatory system, along with heritage aspects of the *Environmental Protection and Assessment Act 1979*.

The purpose of the review, as stated by The Standing Committee for Social Issues, *is to see how we can deliver more effective, relevant, and best-practice ways of recognising, conserving, re-using and celebrating the important heritage of NSW*. We understand that the findings of the review will contribute to the evidence base for a Government White Paper and a subsequent Heritage Bill.

As a starting point for public consultation and community input, Heritage NSW has published a discussion paper. The discussion paper reflects on the current heritage system, considers some alternatives, and poses some questions to assist with public consultation.

Summary of Draft Comments provided by Placemaking NSW, Design Integrity Unit on the Discussion Paper prepared by Heritage NSW, for further discussion with the Department

A detailed table of comments is attached.

In summary,

- It appears that the concerns with the Heritage Act are more in relation to its administration and resourcing rather than the intent, objectives and content of the Heritage Act being out of date or out of step with the community expectations.
- The Heritage Act review should be carried out by informed heritage and planning professionals. The Heritage Act is applied largely to development and used in tandem with the Environmental Planning and Assessment Act.
- We consider that the administration of heritage conservation and development is best placed within the planning and environmental management portfolios, as the management of conservation and development is integral to the planning system.
- The Heritage Act is not exclusively an arts or social justice issue. The Parliamentary Review should also be informed by input of planning and other land use and design professionals would better inform any amendments to the Heritage Act and are best coordinated with reforms to Environmental Planning and Assessment Act.
- The issues raised in the focus questions below are indicative of a lack of community and heritage owner and manager access to professional heritage knowledge and expertise at local and state government levels to assist in best practice outcomes and contemporary development solutions for contemporary living.

Discussion Paper		PMNSW Response
Reform Proposal	Focus Questions	Recommendations
2. Purpose of The Heritage Act 1977 - Heritage Council of NSW	1. <i>What should be the composition, skills and qualities of the Heritage Council of NSW?</i>	<p>Composition of the Heritage Council was reviewed and updated in 2007 in terms of representation of a diverse range of skills and stakeholder interests.</p> <p>Support diverse range of skills and specialist heritage expertise as well as diverse stakeholder representation.</p> <p>Strengthen independent Heritage Council advisory role to Minister.</p> <p>Reinstate mandatory inclusion of ICOMOS, Aboriginal Heritage professional and / or National Trust, Royal Australia Historical Society as member of the Heritage Council – Reason – this will ensure definite heritage membership not “interpreted” heritage membership</p>
	2. <i>How should Aboriginal Cultural Heritage be acknowledged and considered within the Heritage Act</i>	<p>Yes, Aboriginal cultural heritage is currently managed through the Heritage Act currently for post contact sites.</p> <p>Aboriginal cultural heritage provisions currently in the National Parks and Wildlife Act could be moved into the Heritage Act.</p> <p>Also include and manage intangible values and connections to country under the Heritage Act.</p> <p>Ensure Aboriginal Cultural Heritage Professional Membership on the Heritage Council Consider Aboriginal cultural heritage values are part of the site and places history and manage all heritage values.</p>
	3. <i>Are the objectives of the Heritage Act still relevant?</i>	<p>Yes.</p> <p>The Objectives sets out principles to recognise and to protect heritage significance and manage as intergenerational equity and community.</p> <p>Greater emphasis should be placed on identification and listing and therefore management of a diverse range places considered to be of significance to the state and its diverse communities.</p> <p>Heritage Act S170 provides direction for NSW State government agencies identify to protect and manage heritage items.</p> <p>Now considered to be widely out of step with trends in heritage conservation and land use planning and development. (Statement extract from introduction to the Heritage Act Review 2021)</p> <p>Where is the evidence for this claim? What are the trends referred to in heritage conservation? Who are the stakeholders to support this view/claim?</p> <p>In our experience as professional heritage specialists, we consider that issues relating to Heritage conservation and adaptation arise more from not applying the Heritage Act fully and appropriately and are the result of poorly resourced state and local government agencies that are necessary to support mechanisms and administration of the Heritage Act for owners and the community.</p> <p>Professional well educated and experienced staffing of Heritage NSW, independence of Heritage NSW office, and ongoing support to delivery approvals, listings, guidelines, etc must be recognised, valued and supported intellectually and financially to service ongoing community and heritage owner and manager needs and requirements.</p> <p>Following a review of the CMP process, endorsement and support for the creation of Conservation Management Plans for heritage items as a main policy management tool has in recent years been reduced in NSW and brought into line with other Australian states and territories. This lowering of practice standards has reduced and downgraded the CMP process in NSW and the positive management input and administration under the Heritage Act and professional standards for the practice of heritage across NSW.</p> <p>Management of heritage conservation and development through legislation and through the EP&A Act land use planning and development is not a social issue, it’s a planning and development management issue for places.</p> <p>The Parliamentary Standing Committee on Social Issues undertaking this review would be best informed by specialist independent advisors in the heritage, land use planning and development fields.</p>

	<p>4. Does the Act adequately reflect the expectations of the contemporary NSW community?</p>	<p>Yes.</p> <p>The current Heritage Act is a structured framework to identify and address all cultural and natural heritage values.</p> <p>The Heritage Act represents the expectations of the NSW community that heritage will be protected, maintained and managed to enable future generations to appreciate. Current and ongoing community consultation and engagement with Heritage at a local level is high.</p> <p>The Heritage Act can accommodate all heritage places and values including an increasing cultural diversity and increasing focus on Aboriginal cultural heritage.</p> <p>The Heritage Act does not need to change. However, the administration of the Heritage Act may need to change and be updated to reprioritise its application and leadership to focus at a government and community level to reflect current and emerging community issues and expectations in how it is relevant to them and how it is administered.</p> <p>Heritage staffing, resourcing, and funding is necessary to successfully own and manage and care for heritage items.</p> <p>Heritage guidance and guidelines provided by local government and state government need updating and augmenting. to reflect current owner and managers needs and expectations.</p> <p>It should also be recognised that heritage administrators at state and local levels work with multi-cultural communities that make up the Australian population to reflect their heritage and expectations and that this needs to be supported and expanded to meet community needs and expectations.</p> <p>Heritage value in relation to Placemaking and Public Spaces are part of the identified NSW Premiers Priorities. Heritage context, continuity managing change appropriately are key to successfully managing heritage sites and places.</p>
<p>3. Activating our Heritage - Philanthropic investment could be encouraged</p>	<p>5. How can the NSW Government legislation better incentivise the ownership, activation and adaptive reuse of heritage?</p>	<p>Review and research overseas models for incentives that may include broader tax reform/tax breaks.</p> <p>Increase to the NSW Heritage Grants program funding.</p> <p>Include incentives through the EP&A Act reforms and development conditions that support activation and adaptive reuse.</p> <p>Through targeted % incentives/contributions as requirements as part of overall large-scale development projects.</p> <p>Institute a “green star” rating for heritage conservation and adaptive reuse (in a similar way to “star” rating for sustainability).</p> <p>Tie heritage into the Green Star program as an integral element. Provide incentives for sustainability and heritage works and adaptation.</p> <p>Mainstream heritage as part of the broader sustainability agenda and proactive management of climate change, for continued use, reuse and upcycling or recycling of finite resources.</p> <p>Provide support for fulltime heritage officers at local government level to support the conservation and development and provide free advice to heritage owners and managers.</p>
	<p>6. How can we improve incentives within the taxation system to help mitigate the cost of private heritage ownership?</p>	<p>Include incentives through the EP&A Act reforms and development conditions that support activation and adaptive reuse for private heritage ownership.</p> <p>Review and simply and provide streamlined & default opt-in Tax, insurance, and Rates incentives for the ownership and management upkeep of statutory local and state heritage items (at present – while some of these exist – they are not automatic and heritage items owners are required to investigate, value and activate any incentives via complicated set of steps. Rates reduction and DA fees etc should automatically be incentivised with funding to back this).</p> <p>Waive costs of development applications and approvals under EP&A Act and Heritage Act.</p> <p>Include incentives through the Heritage Act reforms and development conditions that support activation and adaptive reuse.</p> <p>If the powers of the Heritage Act are reduced so that the attraction of the residential heritage places is not protected, then the value of the heritage places is under threat from inappropriate works and will have lost its value. This will ultimately impact the tourism contribution to the NSW economy of heritage within NSW.</p>

		<p>At state and government level, support subsidised heritage advisory roles to provide advice to owners at the pre-DA application stages.</p> <p>Heritage advice at local government level should be free to landowners in all locations around the state. Heritage funding to local government is currently sporadic and therefore does not enable councils to offer free advice. This adds another cost onto pre DA advice for heritage item owners.</p> <p>Early advice will assist and reduce unnecessary costs and will help to navigate the planning and development application and approval process and construction.</p> <p>Heritage Awards at state and local government levels.</p> <p>Heritage promotions and positivity through Heritage NSW.</p> <p>At time of transfer of ownership or sale of heritage places, promotion of heritage positivity and advice for owners.</p> <p>Promote heritage conservation as an aspect of sustainability.</p>
	<p>7. What sort of initiatives might encourage activation and conservation of heritage through commercial and philanthropic investment?</p>	<p>Inclusion of heritage assets in Commonwealth Cultural Gifts Program for financial contributions and donations.</p> <p>Institute a “green star” rating for heritage conservation and adaptive reuse (in a similar way to “star” rating for sustainability).</p> <p>Tie heritage into the Green Star program as an integral element. Provide incentives for sustainability and heritage works and adaptation.</p> <p>Main stream heritage as part of the broader sustainability agenda and proactive management of climate change, for continued use, reuse and upcycling or recycling of finite resources.</p> <p>Annual Heritage events funding raising and philanthropic events to encourage philanthropic contributions.</p>
<p>4. Heritage Identification and Listing - It is proposed that NSW adopts a more nuanced set of four heritage listing categories, as set out in Figure 2 below. This change would allow for more tailored heritage protections to be applied to items to suit their individual circumstances. By removing some of the perceived constraints associated with heritage listing, this change could encourage more people to seek heritage listing and better enable the long-term conservation of heritage. This could also encourage heritage owners of existing listings to conserve, activate and celebrate their heritage properties. Low regulation options could be negotiated where appropriate for straightforward or low risk items, while more complex items, such as those with multiple owners, could receive more tailored and streamlined protections.</p>	<p>8. How could tailored heritage protections enhance heritage conservation?</p>	<p>At a state level NSW currently has a 2 tier system of protection at local and state government levels under the EP&A Act and Heritage Act which provides a good and robust system for identification and management.</p> <p>There is a National and International framework in place for managing items through the National Heritage Register under the EPBC Act and world heritage listings through the UNESCO World Heritage Listings (Eg Sydney Opera House and Blue Mountains National Park). For management of federally owned lands.</p> <p>A tailored system would be confusing for owners and administrators, cost more and NOT deliver effective or cost-efficient outcomes for owners and regulators.</p> <p>The iconic items such as the Sydney Harbour Bridge are well managed under the current Heritage Act provisions. These provisions are more than adequate to manage state, national and international heritage values and do not need to be strengthened.</p> <p>The existing controls need to be consistently applied and not over ridden by the various mechanisms created for switching off the Heritage Act through the SSD process and other planning processes.</p> <p>The s170 Heritage and conservation Register for Place management NSW (and state government asset owners), identifies and manages heritage items as either state or locally significant heritage items, where state significant items are managed under the State Heritage Register provisions. This is an effective management regime for state items.</p> <p>However, under the Heritage Act s170 Register there is insufficient processes in place for the management of development and conservation of locally significant heritage items.</p> <p>Eg, The Museum of Contemporary Art (MCA) is a locally listed s170 heritage item, and there is no requirement for the assessment of heritage impacts to changes to this building under the current s170 heritage requirements for state government.</p> <p>There is a need for the assessment and management of heritage impacts for development and change to locally significant and S170 heritage items that follows the same process as state significant heritage items managed by state government.</p>

		<p>Listing of items as locally or of state significance should be based on the established set of significance eligibility criteria, and based on the access to robust legally defensible, well informed and up-to-date heritage studies that includes community input, engagement and consultation.</p> <p>Listing should be determined by the Heritage Council of NSW (where the Heritage Council has members with an appropriate level of heritage expertise).</p> <p>Other external factors – such as political focus, financial or economic hardship, or ownership structures, including heritage items owned and managed by state and local government agencies should not determine if a building is significant and worthy of listing.</p> <p>Sufficient funding and resourcing applied to the management of the Heritage Act and adequate resourcing and staffing to enable development of guidelines and engagement of expertise to heritage projects will support the wider community need for uses of heritage items and can be adequately and appropriately managed under the current Heritage Act legislation objectives - tThis does not need to be changed.</p> <p>Current lack of resourcing and funding means that a cautious, conservative, and legalistic approach to heritage management at State and local government levels.</p> <p>With quality heritage expertise and professional advice, it is possible and desirable to retain heritage significance and creative adaptive reuse for contemporary uses that supports owners needs and heritage outcomes.</p>
	<p>9. How should heritage items that are residential properties be accommodated under a proposed category scheme?</p>	<p>We do not support a change to the current management for residential properties.</p> <p>We do not support the proposed change to the category scheme for residential properties.</p> <p>Most negative impacts of heritage ownership and management on Residential property owners can be mitigated or eliminated by a more accessible and transparent incentives scheme.</p> <p>With readily available, quality heritage expertise and professional advice, it is possible and desirable to retain heritage significance and creative adaptive reuse for contemporary uses that supports owners needs and heritage outcomes.</p> <p>State Heritage listed residential properties are likely to contain externally and internally significant fabric that would need to be assessed and managed for heritage impacts against the significance of the item. This is to ensure the retention of the heritage significance of the whole and so that the heritage values are not compromised or lessened by inappropriate changes.</p> <p>Current listing processes for residential places being considered for state heritage listings, are consulted, and offered an ‘opt-out’ from the heritage listing process. However, this is balanced against the heritage values of the listing and wider community values and benefits of heritage listing to the community and then this is assessed and reviewed independently.</p> <p>A comparative process is Land use Zoning – this is not at the discretion of residential owners, and is imposed on the land owners and is not seen as discretionary but based on wider planning values and strategic value to the community overall – which is beyond individual owner wants and needs at a point in time.</p> <p>State and locally significant heritage items including residential properties should continue to be managed under the s57 and s60 provisions of the Heritage Act and EP&A Act Development Application requirements.</p> <p>Appropriate management of change and modernisation is appropriate within an understanding of the values of the residential properties and should be supported and understood through a Conservation Management Plan that will support sympathetic and compatible development and the retention of heritage values.</p> <p>Residential properties should also be considered within the broader context of the local government area. For example, many items are part of a heritage streetscape and also form part of an Urban Conservation Area of residential properties.</p> <p>There is evidence to support that the social value and economic value and attractiveness of residential properties is <u>increased</u> with the retention of heritage values and heritage fabric and <u>lessened or decreased</u> by removal of the ‘charm and character’ that forms the aesthetic heritage values and fabric.</p>

<p>5. Streamlining Heritage Process - Introduce a community-driven nomination process. Community based 'early-round nominations' would be submitted for Heritage Council consideration. The Heritage Council could then invite more detailed nominations from promising applications. Heritage NSW could provide assistance in preparing nominations.</p>	<p>10. <i>Would greater community engagement deliver a more robust State Heritage Register?</i></p>	<p>Yes</p> <p>There is a community engagement process in place for listings as part of the nomination to the State Heritage Register that can be strengthened.</p> <p>Action should be taken with a gap analysis to identify how this process can be strengthened to engage with and reflect community interest and values and raise awareness of heritage and place and its importance to society.</p> <p>Could establish a community reference group/s to advise back to the Heritage Council.</p>
<p>Introduce a streamlined process to update heritage listings to allow SHR listings to be periodically reviewed and amended to address site changes and ensure a site's full significance is protected. An abridged process would deliver a more accurate representation of SHR items and values over time and ensure that protections are appropriately targeted. Similarly, an abridged delisting process, in certain circumstances, would ensure the SHR remains an up to date representation of State significant heritage items</p>	<p>11. <i>Would streamlining enhance the listing process?</i></p>	<p>Yes, theoretically this would be supported.</p> <p>However need robust and defensible heritage listings that can stand up in Land and Environment Court proceedings.</p> <p>Gazetted items would benefit from easier administration procedures that enable updates to gazetted statements of significance, etc so that the SHR listings can be updated and more information comes to hand.</p> <p>Listings need to be based on an established and clear set of internationally robust heritage significance criteria (current ones are pretty good)</p> <p>Greater funding of the Heritage Listing team to enable a more streamlined process. The Act does not have a role in the streamlining of the listing process.</p>
<p>The Minister responsible for heritage could be responsible for determining, in consultation with the Heritage Council, the regulatory thresholds for standard exemptions, fast-track applications and standard applications for permits under the Act. This would ensure the application and exemption process is flexible and responds to community need making it easier for heritage owners to maintain and conserve their properties</p>	<p>12. <i>How could we improve the current approval permit system?</i></p>	<p>Streamline the Heritage Act, NPW Act and EP&A Act so that permits work and respond to requirements of various legislation and there is no disconnect or contradiction between different legislation.</p> <p>Devolve Heritage Act approvals back to local government – local government would need to be adequately resourced with skilled professionals to implement this effectively.</p> <p>Consider overhauling and having a single 'planning development' assessment and approval process (that combines Heritage Act and EP&A Act considerations)</p> <p>SEPP Exempt and Complying Code and Heritage Act s57 exemptions should dovetail and cover off on the same issues and areas of concern.</p> <p>S60 Fast Track applications are misleading as there is still the need for EP&A Act approval for applications and Exemption or DA consent.</p> <p>Greater clarity and consistency to provide greater understanding about what works can be carried out under an exemption at local and state level for state and local heritage items.</p> <p>Currently Exemptions for local heritage items that are managed under the Standard LEP Clauses, do not provide much guidance and leave a lot up to local councils to decide on. The general tendency for local government management of heritage is to <u>not</u> use the Exemption Provisions due to lack of training of staff and fear of making a mistake.</p> <p>The previous iteration (2008) of the Heritage Act Standard Exemptions for State Heritage Register listed items were established with clear heritage consistent guidelines regarding how they could be applied and were very clear to follow.</p> <p>The review and changes to the Heritage Act Standard Exemptions (Gazette 318 2020), has greatly reduced and limited the application of s57 Exemptions for State heritage items. Many works that could previously be undertaken under S57 Exemptions, now trigger a Heritage Act s60FT/S60 and EP&A Act DA application and approval to undertake works. For example, the updated Exemptions precludes critical maintenance works from exemptions.</p> <p>This has made permits more difficult, more costly and requiring the need to engage specialist consultants for applications and extended timeframes for approvals rather than streamlined the process.</p> <p>Provide further and more extensive delegations under the Heritage Act to local government and state government agencies supported with sufficient funding to engage heritage specialist staff to manage and deliver on these delegations for the community and heritage owners and managers.</p> <p>Provide and fund better training of staff at state and local government agencies for heritage conservation and development.</p>

		<p>Ensure more state government Agency Specific Exemptions/Exceptions are gazetted for State and local government agencies that own and manage heritage and have heritage specialist staff.</p>
	<p>13. Are the current determination criteria for heritage permits still appropriate?</p>	<p>S57 Exemptions as gazetted in December 2020 are too proscriptive and can be disincentive to any one or any agency managing a state heritage item.</p> <p>We support the s57 exemptions in place prior to December 2020.</p> <p>We support the Heritage Council’s Material Threshold Policy objectives and appears to be working in practical application.</p> <p>Section 60 Fast Track - State government owned and managed heritage assets are not subject to LEP heritage provisions and this may trigger the need for Development Application under Parts 4 or 5 of the EP&A Act. This is a problem and inconvenience for manager and occupants including tenants of these heritage assets and has economic impacts in terms of additional application fees and timeframes for approvals.</p> <p>Section 60 Fast Track is misnamed and misleading, and does not meet customer expectations, as the Heritage Act process may be faster, there is now a requirement for additional approvals triggered under the EP&A Act Development Approvals.</p>
	<p>14. How could we improve heritage consideration within land use planning systems?</p>	<p>To better identify history and development in regional planning themes to contextualise heritage character and understand rarity and representativeness within the LGA and more broadly across the region and state of NSW.</p> <p>Under the EP&A Act, reinstate LEP provisions removed at the time of the development of the Standard LEP template so that local government can identify Character Areas with development criteria for their management (nb these character areas are in addition to Conservation Areas under the LEP. Character Areas provide legislative protection to enable an urban landscape, streetscape or significant landscape to be retained and protected. Character Areas also enable the protection of visual curtilages etc (Previous local character zonings were removed from the Standard LEP)</p> <p>The management of heritage and change is a development process that should recognised and be related closely to the management of heritage and land use planning under the EP&A Act.</p> <p>Heritage Act management of development management cannot be viewed in isolation from other land use planning and development legislation.</p> <p>The Heritage Act should dovetail into the Exempt and Complying Code SEPP requirements to ensure a streamlined approach and no contradictions between legislation.</p> <p>The EP&A Act has heritage objectives in the Act – it sets objectives for heritage and urban design.</p> <p>Incorporate heritage into planning into A single Act with a single set of objectives to manager conservation and development processes for land use.</p> <p>Heritage Act only applies to state significant items and does not address management of local heritage items – should include local heritage items to provide a framework for local government management of heritage.</p>
	<p>15. Are there opportunities to enhance consideration of heritage at the strategic level?</p>	<p>Yes</p> <p>Heritage cannot be only considered on a case by case basis, property by property basis, the strategic understanding and management of heritage conservation, planning and land use under the EP&A Act and SEPPs are critical to wholistic and well throughout planning and management decision making.</p> <p>For example: <i>Bays West Place Planning Strategy</i> draft 2021- provides a strategic planning direction that considers and incorporates heritage as a key consideration – White Bay Power Station, Glebe Island Bridge and public lands.</p>

		<i>Pymont Place Planning Strategy - draft 2020 provides a strategic planning direction for heritage in Pymont and Darling Harbour.</i>
It is proposed to introduce a series of intermediate enforcement powers to allow heritage regulators to take a graduated and proportionate response to noncompliance. This would include investigative powers allowing Heritage NSW the ability to gather sufficient evidence to prove an offence, along with the ability to issue penalty or infringement notices. This change would allow Government to take more nuanced and lighter-touch enforcement approaches, as an alternative to expensive and uncertain court action.	<i>16. How could heritage compliance and enforcement be improved?</i>	<p>Empowerment of the Heritage Council and NSW and Heritage NSW at officer level to enforce compliance and provide resourcing and stronger penalties.</p> <p>At Office level, increase powers, more resourcing, stronger penalties for non-compliance.</p> <p>Better to lead by example – promotion of best practice heritage conservation in Government-owned projects to encourage better conservation in the private sector, better promotion of heritage projects where Government grants have been given for private works.</p> <p>Devolve responsibility for non-compliance to local government for EP&A Act breaches for heritage provisions by local rangers and compliance staff.</p>
6. Heritage Promotion and Engagement	<i>17. How could understanding of state heritage be enhanced?</i>	<p>Recognise and development strategies for cultural and natural heritage underpins tourism at domestic and international levels.</p> <p>Increase marketing and awareness of NSW and heritage as a brand through working with Destination NSW and seek specialist marketing and consultant input.</p> <p>Include and increase input into educational programs for primary, secondary and tertiary levels and the general community.</p> <p>Reinstate and provide appropriate Heritage Trade Training skills courses into general TAFE Training – upgrade TAFE training to include traditional methods of construction. There are not the tradespeople coming through in these professions in Australia to support current demand and many trades people have been trained overseas and emigrated to Australia to find work, for example; trades people from the United Kingdom where these trades are supported and funded and education courses are provided.</p> <p>Upskill training of planners and architects by incorporating heritage management as optional main-stream degree courses.</p> <p>Communities do not generally differentiate between state and local heritage – its all heritage. Make more relevant to local communities.</p>
	<i>18. How could we improve heritage tourism or help activate heritage places for tourism?</i>	<p>Recognise and development strategies for cultural and natural heritage underpins tourism at domestic and international levels.</p> <p>Increase marketing and awareness of NSW and heritage as a brand through working with Destination NSW and seek specialist marketing and consultant input.</p>
7. Publicly Owned Heritage	<i>19. How could public heritage buildings be activated to meet the needs of communities?</i>	<p>Review and research overseas models for incentives for opening up public heritage buildings.</p> <p>Build on and development the ‘Sydney Open’ event and mindset for greater access to public heritage buildings throughout the year and by special events.</p>