

**Submission
No 45**

INQUIRY INTO REVIEW OF THE HERITAGE ACT 1977

Organisation: Penrith City Council

Date Received: 24 June 2021

Our reference: ECM: 9592205
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24 June 2021

The Director, Standing Committee on Social Issues
Parliament House
Macquarie Street
SYDNEY NSW 2000

Email sent to: Committee.SocialIssues@parliament.nsw.gov.au

Dear Director

Review of the Heritage Act 1977

I refer to your email dated 18 May 2021 requesting a submission into the Review of the Heritage Act 1977.

Please find attached Council's submission which has been prepared by Council's Heritage Consultant, OCP Architects dated 16 June 2021.

In response to questions regarding publication, OCP Architects and Penrith City Council consent to our submission being published in full on the website including our details.

If you would like to discuss our submission further, please contact me
or Mr. Otto Cserhalmi of OCP Architects

Yours sincerely

Peter Wood
Development Services Manager

16 June 2021

Legislative Council
Parliament of New South Wales
Macquarie Street, Sydney, NSW, 2000

Attention: Standing Committee on Social Issues

RE: REVIEW OF THE *HERITAGE ACT 1977*

We are writing on behalf of OCP Architects regarding the proposed review of the *Heritage Act 1977*.

OCP Architects has provided specialist architectural and heritage consulting services to government and private sector clients for over 30 years. The company comprises a multi-disciplinary team of skilled professionals, including architects, heritage consultants, town planner and historian that provide a range of services including sensitive adaptation and integration with contemporary architecture in addition to high level advice and reporting for development, conservation and maintenance work, and preparation of all types of heritage management documents. In addition to the consultancy services provided by OCP Architects, Otto Cserhalmi, Principal of OCP Architects, has been providing the heritage advisory service to Penrith Council for over 20 years and Hawkesbury Council for almost 10 years.

We have structured our submission in two parts. Part 1 provides a tailored response to the focus questions identified in the discussion paper prepared by the Standing Committee on Social Issues in April 2021. Part 2 of our submission provides additional discussion of issues which affect the heritage management system in New South Wales that we believe needs further government action.

PART 1 – RESPONSE TO FOCUS QUESTIONS

1. What Should be the composition, skills and qualities of the Heritage Council of NSW?

A brief search of the State Heritage Inventory reveals that there are currently 1737 heritage items listed on the State Heritage Register under the *Heritage Act 1977*. Of these, 1033 are built heritage, a further 373 items are a complex or group item (many of which include built heritage), and 6 are conservation areas (many of which include built heritage).

TYPE OF HERITAGE ITEM	NUMBER OF ITEMS
Built heritage	1033
Complex or Group	373
Archaeological (terrestrial)	50

Archaeological (maritime)	7
Conservation Areas	6
Landscape Items	231
Moveable/ Collection	37
Total	1737

While it is noted that many items listed as built heritage also contain other types of heritage (including archaeological, landscape moveable items and aboriginal cultural heritage), a high proportion of the state listed heritage items in New South Wales comprise built heritage. It is important that the Heritage Council of NSW is composed of skilled professionals with extensive experience in all aspects of heritage, including senior architects, heritage consultants, planners, archaeologists, landscape, and Aboriginal cultural heritage specialists. However, given that more than half of the heritage items are built heritage items, the heritage council should include a number of senior heritage architects to appropriately reflect the proportion of heritage items in New South Wales that comprise built heritage.

Furthermore, the composition, skills and qualities of the staff at Heritage NSW should also reflect the large number of built heritage items and therefore, applications involving built heritage. Staff should be equipped with adequate knowledge and skills to be able to make informed decisions about the management of built heritage, including an understanding of structures and traditional construction methods and conservation practices.

Based on our interactions with Heritage NSW in recent years, it has become apparent that there is a shortage of senior heritage architects. Applications are often reviewed by heritage consultants with an educational background in archaeology or planning, and with insufficient experience in architecture. In addition to the incorrect balance of skills, Heritage NSW is chronically understaffed and underfunded due to numerous rounds of cost cutting and restructuring by the NSW government. The combination of understaffing due to lack of funds and imbalance of skills amongst staff is the main contributing factor affecting approval timeframes and the appropriate management of heritage assets in NSW.

Recommendations:

- The Heritage Council should comprise senior professionals with skills spanning all aspects of heritage (architecture, planning, archaeology, Aboriginal cultural heritage, industrial heritage, landscape heritage, engineering heritage), however, the composition of the heritage council should reflect the proportion of each type of heritage in NSW.
- Increase funding, staffing and professional development of Heritage NSW Staff.
- Consider engaging senior specialists in the field of Heritage Conservation to provide seminars to Heritage Division Staff and NSW Heritage Advisors to local councils (for example, Senior Heritage Architects could provide seminars on traditional construction, conservation methods, etc.).

2. How should Aboriginal Cultural Heritage be acknowledged and considered within the Heritage Act 1977?

As the oldest living culture in the world, Aboriginal cultural heritage holds immense significance in terms of its cultural, scientific, educational and historic interest for both Aboriginal people and more

broadly for Australian society. Aboriginal cultural heritage is a fundamental component of the heritage of New South Wales and the history of this nation.

In NSW, Aboriginal cultural heritage is currently managed under the *National Parks and Wildlife Act 1974*. However, many heritage places or examples of living Aboriginal cultural heritage are not located in National Parks. The management of all Aboriginal Heritage under the *National Parks and Wildlife Act 1974* therefore adds a layer of confusion in the approval pathway for sites containing Aboriginal cultural heritage, particularly for sites containing other types of heritage items or sites that are not located within National Parks. The acknowledgement and management of Aboriginal cultural heritage under the *Heritage Act 1977* may recognise the contribution and significance of Aboriginal history and culture to the Heritage of New South Wales, whilst also providing a clearer heritage approval process that applies to all types of heritage.

Recommendation:

- Provide a framework for the management of Aboriginal cultural heritage under the *Heritage Act 1977*. Ensure that any legislative changes do not weaken protections of Aboriginal cultural heritage.

3. Are the objectives of the *Heritage Act 1977* still relevant?

The existing objectives of the *Heritage Act 1977* are still relevant. However, additional objectives should be added to provide a legislative framework for the protection of NSW's heritage in accordance with the ICOMOS Australia's *Burra Charter 2013*.

Since the Heritage Act was gazetted in 1977, heritage conservation practice has evolved. Following the International Charter for the Conservation and Restoration of Monuments and Sites (Venice Charter 1966), Australia ICOMOS devised the *Burra Charter* in 1979 which was intended as the guiding framework for the management and conservation of heritage sites in Australia. These guidelines have evolved with numerous revisions (1988, 1999 and 2013). *The Burra Charter 2013* is widely adopted in Australia and NSW as the best practice approach to the management of heritage sites. In accordance with the Burra Charter process, the first step in planning for and managing a heritage place is to understand and assess its heritage significance. One of the major issues contributing to a costly and lengthy approval process for works to heritage listed places is the lack of understanding of heritage significance in the initial (and subsequent) phases of planning works to a heritage place. When a development proposal to a heritage item is developed without an in-depth understanding of the heritage significance of a place, the approval authority often require additional research, heritage assessment, and numerous revisions to the proposal. This can become costly and more time-consuming for both the developer and the approval authority. However, where an investigation of heritage significance is undertaken early on, and the appropriate heritage advice is sought in the initial phases of planning works, appropriate decisions can be made about the management of heritage sites and considerable time and money can be saved for both developers and approval authorities.

Given that the Burra Charter is widely accepted as the best practice approach to heritage conservation, it would be appropriate for the *Heritage Act 1977* as the principal piece of legislation for the protection of heritage in NSW to recognise and enforce the Burra Charter process described above.

In addition to the above, the *Heritage Act 1977* does not currently include any provisions for development in the vicinity of a state listed heritage item. Development in the vicinity of heritage

items have the potential to detrimentally impact on the setting of heritage items. The *Heritage Act 1977* should include provisions to ensure that development in the vicinity of heritage items is undertaken in a more sensitive manner in terms of building heights, volume and massing, building materials and landscaping. Developments adjacent to heritage items should include adequate setbacks to allow for deep rooted trees and vegetation to reduce the impact of the new development and provide screening.

Recommendation:

- The objectives of the *Heritage Act 1977* should be augmented to require that all decisions and actions relating to the management and development of heritage items should be undertaken in accordance with the assessed significance of the item as agreed upon by the approval authority. The investigation and assessment of heritage significance should be undertaken prior to planning any works to a heritage place and this assessment of significance should be agreed upon with the relevant approval authority as the guiding framework for the management of the heritage item.
- Introduce additional provisions in the *Heritage Act 1977* for development in the vicinity of/ adjacent to heritage items.

4. Does the Act adequately reflect the expectations of the contemporary NSW community?

The population of Australia and NSW has changed in the last 50 years with numerous waves of migration, globalisation, modernisation and a renewed focus on Aboriginal cultural heritage. These major shifts in Australian society are an important part of the history and culture of our society.

The modernisation of Australia, increasing cultural diversity and renewed focus of Aboriginal culture should be celebrated and recognised in NSW's heritage management system. However, these changes do not diminish the importance or relevance of the existing items recognised on the NSW State Heritage Register. Rather, we need to expand and increase our definition and approach to heritage conservation to emphasise the importance of Aboriginal culture as well as modern developments in our nation, so that these aspects of our cultural heritage are appropriately recognised and safeguarded for future generations.

Page 7 of the discussion paper states that the *Heritage Act 1977* is considered to be too onerous and procedurally complex. As consulting architects and heritage consultants with a range of private sector and government clients, OCP Architects do not believe that the provisions of the *Heritage Act 1977* are too onerous. The existence of a strong legislative framework with both prescriptive legislation and strong compliance measures is essential for the provision of a clear framework for the management of heritage in NSW. However, there are a number of other factors that affect the heritage management system in NSW. These are discussed further in Part 2 of our submission below.

Recommendations:

- Amend the *Heritage Act 1977* to recognise and protect Aboriginal Cultural Heritage, including Aboriginal places and living Aboriginal heritage.
- Include provisions for the assessment and protection of modern heritage, including the recognition of modern architecture, heritage associated with ethnic communities, migration, and major society changes in modern Australian history.
- Include provision for the assessment and protection of buildings/ items over 50 years old.

5. How can NSW Government legislation better incentivise the ownership, activation and adaptive reuse of heritage?

This could be achieved through an expanded grants program for both State and locally listed heritage items for heritage conservation, activation and adaptive re-use projects, funded by the NSW government and administered by Heritage NSW in conjunction with local councils. Grants could be targeted at a wide range of categories of works, including adaptive re-use, restoration, conservation, maintenance, interpretation, education and tourism (discussed further in relation to focus questions 17 and 18 below). The effectiveness of the grants program is dependant on the number, value, availability and appropriate administration of grants. It is essential that a portion of the grant money is set aside to the authority administering the grants. For example, if the grants are to be administered by local councils, then part of the money should be allocated to cover Council's costs of providing advice, assessment and monitoring of projects funded by grants.

In addition to an expanded grants program funded by the NSW government, additional legislative measures could be introduced to incentivise the ownership and conservation of heritage items through the introduction of a transferrable heritage floor space scheme (similar to City of Sydney's HFS scheme) at a State level. However, this system needs to be carefully managed so that the revenue generated from the heritage floor space is used for the long-term conservation of the heritage item. Grants for heritage floor space should be dependant upon the preparation of conservation management plans, and the completion and documentation of heritage conservation works. However, so that the ongoing conservation of the heritage item is safeguarded, recipients of transferrable HFS should be required to prepare a costed long term maintenance plan for a minimum 25-year period which sets out the detailed requirements of maintenance and conservation of the heritage item. The maintenance plan should be prepared by heritage architect with input from other skilled heritage professionals where required, should be site-specific with room-by room (or element by element) guidelines on the works to be undertaken over a 25-year period, and should be costed by a quantity surveyor. This would allow the custodians of the heritage item to appropriately plan and budget for the maintenance of the property while also providing an important reference document to the approval authority(s) when assessing future development applications or administering grant funds.

Recommendations:

- Expand the heritage grants program to provide a greater number of grants for a wider variety of heritage projects for State and locally listed heritage items. Ensure that funds are allocated (or a proportion of grant money) for the administration, assessment and monitoring of projects funded by grants.
- Introduce a transferrable heritage floor space scheme to incentivise ownership of heritage properties and fund the conservation of heritage items. Ensure that the legislation safeguards the ongoing conservation of the heritage item by preparing appropriate conservation documentation and utilising the revenue generated by the award of HFS for the long-term conservation of heritage items.

6. How can we improve incentives within the taxation system to help mitigate the cost of private heritage ownership?

It is essential that heritage properties are maintained and conserved in an appropriate manner utilising the advice from skilled heritage professionals and trades with knowledge and experience in heritage conservation (heritage architects and engineers, stonemasons, roofers, plasterers, painters,

lead-workers, brick pointers, etc.). Due to the specialisation of skills in this field, and the shortage of tradespersons with the appropriate experience, these works are often more costly and time consuming and can pose a burden on private owners of heritage properties. Tax incentives could be used to help relieve owners of the financial stress of maintaining and conserving their properties. This could be undertaken in the form of tax deductions for conservation and maintenance works, as well as the increase in the number and availability grants for undertaking heritage works.

As income tax is paid to the commonwealth and land rates are paid to local councils, tax rebates or deductions would require cooperation and agreement between numerous levels of government. Incentives through the award of grants funded by the state and administered by local councils may be more feasible.

Recommendation:

- Consider providing tax rebates or deductions to alleviate the cost of maintaining and conserving heritage items for private heritage owners.
- Establish an expanded heritage grants scheme funded by the State government.

7. What sort of initiatives might encourage activation and conservation of heritage through commercial and philanthropic investment?

The NSW Government could consider initiating a heritage funding program similar to the Heritage Lottery Scheme in the United Kingdom.

**8. How could tailored heritage protections enhance heritage conservation?; and
9. How should heritage items that are residential properties be accommodated under a proposed category scheme?**

Development constraints should be determined by level of significance and integrity rather than the type or category of heritage item. The proposed category system referred to in the *Review of NSW Heritage Legislation Discussion Paper* could be problematic as it may downgrade the significance and level of protection of certain types of heritage items. It is essential that heritage protections allow for a case-specific approach as there may be some heritage listed residential properties which could allow for some degree of internal alteration while other highly significant, rare and/or intact heritage listed properties require a greater degree of protection and could accommodate fewer modifications. If a category system is introduced, it should be based on a broad comparative analysis of the types and levels of significance of all heritage items in New South Wales so that the relative significance and management requirements can be protected.

Recommendation:

- Ensure that the significance assessment and management of heritage items is undertaken in a site specific and case-by-case manner. Attempts to categorise heritage items should not be based on the assumption that a particular category of heritage items (e.g. public buildings) are more significant than other categories of heritage items (e.g. residential homes). The degree of acceptable change to a heritage item will depend on the significance of each individual item.

10. Would greater community engagement deliver a more robust State Heritage Register?

There is currently a system in place for community-based heritage studies to be undertaken local councils in association with the local community. This process is promoted by Heritage NSW and is funded by the heritage grants program.¹ A number of local councils have undertaken community-based heritage studies which allow the community to nominate potential heritage items and respond to the proposed listing of heritage properties. Heritage listing should protect places that are important to local communities. However, introducing a nomination process that is purely community driven would be problematic as it may result in an inconsistent approach to heritage listing where properties that are equally significant don't get listed because the community didn't nominate them. Heritage conservation is important for the protection of places for existing communities as well as future generations. Furthermore, the interests, values and culture of communities can change over time. Therefore, a community driven nomination system should not be solely relied upon.

One significant form of community engagement are local council heritage advisory groups/committees. These groups are often a rich source of history and information about the local area and could provide information to support the assessment of significance and heritage listing of properties in that area. Consultation with local heritage advisory groups and more generally, the broader community, could help strengthen the heritage listing process.

While community input is important in the heritage listing process, decisions about the listing of properties should be based on the detailed assessment of significance in accordance with the NSW Heritage Criteria and should be determined independently by heritage professionals.

11. Would streamlining enhance the heritage listing process?

Heritage items need to be supported by a thorough significance assessment and this often contributes to the timeframes for heritage listing properties. An abridged de-listing process is not appropriate. It is essential that de-listing undertaken with thorough consideration of whether or not the heritage item meets the criteria for heritage listing.

The process for heritage assessment and heritage listing would benefit from increased funding and staffing for Heritage NSW and through the allocation of state funding for Heritage Advisors for every local council in NSW. This is discussed further in Part 2 below.

Recommendations:

- Maintain the existing heritage listing and de-listing process.
- Increase funding and staffing of Heritage NSW and allocate funding for heritage advisors for local councils.

12. How could we improve the current approval permit system?

13. Are the current determination criteria for heritage permits still appropriate?

¹ <https://www.heritage.nsw.gov.au/assets/Uploads/a-z-publications/a-c/Community-based-heritage-studies-A-Guide.pdf>

The best way to improve the current approval permit system and timeframes for assessment of applications would be to increase funding and staffing of Heritage NSW, and to integrate the Burra Charter process into the *Heritage Act 1977*, as discussed above in relation to questions 1 and 3.

Increased education and professional development programs for Heritage NSW staff and heritage advisors in local government and council planning officers would also help so that appropriate advice can be given to owners of heritage properties at the initial stages of planning works to a place.

The current approval process for minor works is an effective way of streamlining heritage approvals, however, minor works have the ability to detrimentally impact on heritage significance through successive changes made over time. While it is important to have a separate approval pathway for minor works, it is essential to ensure that the cumulative impact of a series of minor works are monitored over time. The best way for this to occur is for Heritage NSW to be maintained as the approval authority so that consistent oversight is provided to monitor the cumulative impacts of successive changes to heritage items over time. If these minor works are not monitored by Heritage NSW, increased pressure is placed on local Councils to monitor works to heritage items in their local government areas. Many local councils do not have adequate funding or staffing with experience in heritage conservation to be able to effectively manage these works. Therefore, reduced oversight of minor works by Heritage NSW and oversimplification of the approval pathway for minor works has the potential to adversely impact the significance and integrity of heritage items in New South Wales.

Where the Minister is given powers to by-pass the heritage approval system for major developments, it is essential that a rigorous site-specific assessment process is undertaken by a professional advisory group with adequate expertise and experience in the heritage matters being considered.

Recommendations:

- The current approval permit system is working well in Heritage NSW and should be maintained.
- Funding and staffing of Heritage NSW and NSW heritage advisors at local council should be increased.
- Heritage NSW should maintain delegation for the approval of minor works to state listed heritage items so that cumulative impacts on significance can be assessed and monitored.

14. How could we improve heritage consideration within land-use planning systems?

15. Are there opportunities to enhance consideration of heritage at the strategic level?

Heritage requires greater consideration at a strategic planning level to ensure that land rezoning adequately considers heritage items and conservation areas. Conservation areas or areas with a high density of heritage items require more detailed site-specific analysis to determine appropriate building forms, volumes, building materials, landscaping (including the need for deep rooted trees). Land zonings which allow larger building volumes are not always appropriate in conservation areas or areas with a high density of heritage items. Heritage items or conservation areas are often located in zones which would permit a degree of development that would not be appropriate for the heritage site or area. Greater consideration should be given at the rezoning stage to ensure that adequate protection is provided to heritage sites and that heritage listed properties are not inappropriately zoned. One potential solution would be to introduce a 'heritage zone' that would apply to all heritage listed properties that would require development standards to be developed in a more site-specific manner.

16. How could heritage compliance and enforcement be improved?

Heritage compliance and enforcement forms an essential part of the heritage management system. The provisions in the *Heritage Act 1977* for compliance and enforcement should be maintained and strengthened where possible with additional intermediate enforcement powers.

Recommendation:

- Maintain existing compliance provisions and include additional provision for intermediate enforcement powers.

17. How could understanding of state heritage be enhanced?

18. How could we improve heritage tourism or help activate heritage places for tourism?

The Heritage NSW grants program could be expanded to provide more targeted grants for education and tourism, for example, in the creation of apps for heritage tours. One example of this is the Heritage of Western Sydney (HoWS) app developed by Penrith, Hawkesbury, Camden and Liverpool Councils which explores the fascinating history of these combined government areas which includes the largest group of early Colonial European heritage assets in Australia. The app links many historic buildings, farmhouses, churches, cemeteries, roads and bridges in the region in the form of guided themed walking and driving tours. The app is a great resource for both community education and tourism.

State government grants could also be targeted at adaptive reuse projects such as the adaptive reuse of historic properties as Bed Breakfast accommodation with accommodation, café/restaurant, family attractions and parking.

In addition to increased heritage grants, a State government initiative for linking local council heritage advisors with local heritage community groups and tourist information centres may be beneficial in the activation of heritage places for tourism and community engagement.

Recommendation:

- Provide increased targeted grants for heritage tourism initiatives, including tourism apps and adaptive reuse projects geared towards tourism facilities (e.g. bed and breakfast accommodation, museums, galleries, restaurants, etc).

19. How could public heritage buildings be activated to meet the needs of communities?

Adaptive re-use must be undertaken in a site-specific manner which is based on a thorough understanding of heritage significance. It is not appropriate to apply a blanket approach for adaptive re-use.

Heritage conservation and adaptive reuse can be inherently sustainable. The adaptive re-use of heritage buildings could be promoted by local and State government not only for the benefit of maintaining heritage but also for the environmental benefits of reusing existing building stock with minimal intervention and avoiding the carbon footprint associated with new construction.

PART 2 – OTHER ISSUES AFFECTING HERITAGE CONSERVATION IN NEW SOUTH WALES

There are a number of other issues that contribute to the complexity and cost of owning and managing heritage properties in New South Wales.

A. TAFE courses and apprenticeships targeted at specialist heritage trades

Firstly, there is a lack of education and training for specialised trades in heritage conservation works. There are currently no TAFE courses or specialised apprenticeships which are focused on teaching skills in heritage conservation such as stonemasonry, heritage brick laying (including tuckpointing), plastering, lead working and traditional joinery.

The lack of available formal training discourages young people to develop their skills and work in the heritage conservation field which has contributed to a skills shortage in this field. This places additional pressure on the select few companies with adequate experience in heritage conservation works and contributes to the increased cost of heritage conservation works as well as the protracted timeframes for undertaking works.

Furthermore, due to the lack of TAFE courses and specialised apprenticeships, existing construction companies that specialise in heritage conservation are recruiting in Britain and Europe rather than in Australia to acquire personnel with the relevant skills and training. This could be overcome through the introduction of a panel of skilled practitioners for the examination and certification of heritage trades.

Recommendations:

- Increase TAFE funding to provide specialise heritage trades courses.
- Increase the range of available apprenticeship programs to include training with specialist heritage trades.
- Establish a panel for the certification of heritage trades (where no TAFE courses exist, e.g. lead workers).

B. Funding for Local Council Heritage Advisors and Heritage NSW.

Heritage advisory services in local Councils provide an essential service to assist both local council planning staff as well as the local community, in particular, owners of heritage listed properties through the provision of advice on a range of issues including maintenance, repair and conservation of heritage properties; heritage significance of buildings; development and adaptive re-use of heritage listed properties; heritage listings; and input into strategic planning where relating to heritage. The availability of free professional advice to private owners of heritage properties through the heritage advisory service has the potential to save people time and money when planning changes to a heritage property, particularly when advice is sought at the initial phases of planning changes to a heritage place. Heritage advisors also assist in the assessment of development applications relating to heritage listed properties. State government funding for the provision of a Heritage Advisor in every local council in New South Wales would enable the provision of advice to property owners and council staff so that heritage properties within the local government area can be effectively managed.

When property owners are not able to get advice on their heritage properties, the development approval process takes longer because there is no consensus on heritage significance and what constitutes an acceptable adaptive reuse or development approach.

Recommendations:

- Increase State government funding for the provision of a state funded heritage advisory service in every local council in New South Wales.
- Increase funding and staffing at Heritage NSW.

C. Education and Accreditation for Heritage Practitioners, Heritage Advisors and Heritage NSW Staff

Another issue affecting NSW's heritage management system is the lack of a recognised accreditation system for heritage professionals. Currently, a range of professionals can provide heritage consultancy services without the need to prove competency in heritage conservation. While some companies have the skills and experience to provide good heritage expertise, others do not. While Heritage NSW has a list of consultants in various aspects of heritage conservation practice, the list is not vetted in any way. In addition, local council staff are not permitted to favour or recommend particular companies over others. Therefore, many owners of heritage properties obtain services from consultants or tradespersons with inadequate experience in heritage conservation. This often results in inappropriate advice, poor design outcomes and inadequate workmanship when relating to heritage buildings. This is a huge challenge for approval authorities when assessing development applications relating to heritage properties.

It is therefore imperative for an effective heritage management system to have a recognised accreditation system for all types of heritage practitioners (heritage consultants, heritage architects, archaeologists, engineers, heritage builders, stonemasons, lead workers, traditional joiners, etc.). Accreditation should be required for all heritage professionals, including private consultants, NSW heritage advisors, Heritage NSW staff and heritage tradespersons.

Education material for the purpose of accreditation could be provided online, with additional seminars provided by senior professionals in the field. Accreditation could be provided via a panel of senior professionals in each area of heritage conservation.

Recommendations:

- Introduce a recognised accreditation system for all heritage practitioners.

CONCLUSION

It is our opinion that the strength and effectiveness of NSW's heritage management system is dependent on having a strong legislative framework in place, as well as a well-funded and adequately staffed government authority and grants system, and a system for the education and accreditation of all types of heritage professionals and trades.

Yours faithfully,

Otto Cserhalmi
Principal
On behalf of OCP Architects