

**Submission
No 190**

INQUIRY INTO REVIEW OF THE HERITAGE ACT 1977

Organisation: AMAC Group

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AMAC

Archaeological



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

Submission
Review of the Heritage Act 1977

Dear Director of the Standing Committee on Social Issues,

Thank you for the opportunity to provide submission. AMAC Group present this letter as a response to the Focus Questions of the Discussion Paper. AMAC Group is led by senior archaeologists who collectively have 83 years of full-time experience as consultants for historical and Aboriginal archaeology in New South Wales. Our Director, Martin Carney, has operated since 1989 and has 32 years of continuous experience with the Act under review.

As consultants, we work with site owners and developers who wish to alter land that contains important archaeological information considered a 'relic' under the Act and we are most familiar with how the Act provides our clients with permits to excavate.

Our concern is that the inquiry does not refer to historical, maritime or Aboriginal archaeology even though the majority of Australia's material evidence for its heritage is buried beneath our towns, cities and rivers. Archaeological data is rare and it is easy to ignore and destroy. But it is one of our best resources of information for understanding who we were and who we decide to be. Throughout the inquiry, we hope that the committee will consider the protection of archaeology - Australia's 'buried heritage.'

Thank you again for the opportunity to provide a submission, AMAC Group are willing to collaborate further if this would be helpful to the committee.

Kind Regards,

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Focus Question 1: What should be the composition, skills and qualities of the Heritage Council of NSW?

An even mix of representatives of various ages, genders and cultures – ideally with impressive experience from a variety of related professional backgrounds or from a high standing in their community. We see no need for involvement from active or former politicians or public servants as these stakeholders are already represented by the Minister and Local and State government administrators.

Focus Question 2: How should Aboriginal Cultural Heritage be acknowledged and considered within the Heritage Act

Aboriginal Cultural Heritage and its management should be self-determined by Aboriginal Communities however the NSW Government should support self-determination by codifying it and providing mechanisms so that it can be continually maintained and refreshed by current and emerging Elders. The NSW Government should also either adopt The Uluru Statement of the Heart or incorporate its principles into any new Act or amendment.

As consultants, we see daily that ‘contact archaeology’ and Aboriginal archaeology are poorly recognised by the current Heritage Act 1977 and the State Heritage Register as it was not designed to incorporate the current perspectives and past experiences of Aboriginal peoples. AMAC Group support uniting both Aboriginal and historical archaeology under one Act. This would ideally eliminate duplication of effort for applicants, consultants and administrators who manage sites that require permits under both the Heritage Act 1977 and the National Parks and Wildlife Act 1974. To unite our cultural management under one Act could unite our appreciation for all Australian heritage.

As an aside, nomenclature is crucial to the formulation of laws. We routinely see archaeology and heritage described as Aboriginal Heritage or Non-Aboriginal and it is our opinion that to name something by what it is not is misleading and unprofessional. If the Act will insist on defining heritage by its cultural origin – please avoid Non-Aboriginal or European Heritage as blanket terms. Even ‘Historical Archaeology’ is debatable as a term for the post-1788 era in Australia considering its implication that the period before 1788 is ‘prehistoric’ or without a recorded and understood past. If Aboriginal communities are amenable, the Act might consider pairing Aboriginal Heritage with Colonial or Post-Colonial Heritage as this at least acknowledges colonialism as the political underpinning of the occupation and alienation of Australian land and the seismic cultural and population shifts that have occurred here since the 18th century that still shape the lives of so many people. The NSW government should not shy from the political implications of this discussion – it would be absurd for a government to adopt an apolitical position – and the government should demonstrate leadership and consistency on this matter.

AMAC Group look forward to a future where heritage and archaeology are a shared and reconciling experience.

Focus Question 3: Are the objectives of the Heritage Act still relevant?

Focus Question 4: Does the Act adequately reflect the expectations of the contemporary NSW community?

In terms of our response to Focus Question 2 – No. The objectives of the Act are not relevant as they exclude the experiences of our Aboriginal Australian family.

If Aboriginal Heritage is included in every consideration of the Acts seven high level objects (a)-(g), then yes the objectives are relevant. AMAC and our community of clients, family and friends expect that the State should legislate to promote, understand, conserve and identify heritage and this is best supported by the State providing and updating a register, interim protections, controls for adaptive reuse, conferring to the Heritage Council and assisting owners of heritage items.

However, the list of objectives should be expanded to include ‘site interpretation.’ We see ‘site interpretation’ as an important tool to support adaptive reuse and site activation and to keep heritage and archaeology relevant to the public. Similar to consent conditions that require the developer to install

'public art', excavation permits sometimes require that the land owner 'interpret the site' in built form using the site's history, archaeology and heritage as the subject matter. For archaeology, in its most common form, 'site interpretation' results in foyer display cases of artefacts recovered from excavation and inlaid tiling that replicates former building footprints. Whilst these are helpful, there is rich territory to be explored if the act of 'site interpretation' occurred throughout a Local Government Area and projects could play with a mix of inspiration from both our 'inherited heritage' and the emerging heritage of our current cultural values. An example of this may be that the Act require each LGA to consult their communities and create their own Master Plan for Site Interpretation. Developers could then compete for funding or tax relief if their projects were an excellent opportunity for Site Interpretation. Cumulative interpretation projects in an LGA could then bring to life, a little at a time, a cohesive and growing cultural vibrancy.

Such a plan relies on the belief that commercial development should be balanced by cultural amenity and that cultural values should be communally decided. We believe these are widely held expectations that the Act could support. Master Plans could refer widely to themes of reconciliation, sustainability, nature conservation, innovation, ethical workplaces, social equality and liveable cities as well as art, architecture, history, heritage and archaeology so that a community could explore the tension between past and current values as a group rather than the current system which relies on professionals and developers to dictate themes to a passive public.

If exciting public site interpretation became the norm, we recommend the work of TZG Architects at the Paddington Reservoir Gardens or North Sydney Council's 'The Coal Loader' as examples, it could drive a new pattern of placemaking and breathe life into our CBDs and towns beyond daylight business hours, attract locals and tourists, and become a key stepping-stone for the sought-after 24-hour economy which is an expectation of many NSW business owners.

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

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

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

If heritage and archaeology were linked to competitive commercial incentives, civic pride, social debate and planning legacies for our future - then owners, developers, philanthropists and the public could pursue high quality outcomes to outshine one another and provoke engagement rather than feel obliged to comply by law and undertake 'box-ticking' projects in lacklustre performances for certifiers.

Competitive Incentives

- Target incentives to commercial developers, architects and engineers and target them as early as possible in the planning process so 'heritage-thinking' is embedded in concept designs.
- Incentives could be 'won' against competitors and a set of criteria or deliberated by an appropriate panel. The best of those stakeholders, listed above, have the finance, time, and speciality to plan and execute high quality adaptive reuse and interpretation and the professional instincts to compete for the highest standards or most exciting approaches.
- Architects and engineers should be involved as early as possible to make ideas achievable – this is especially important for in situ conservation of archaeology as basements, footings and services are often left until late in the design process yet these cause the most damage and are the least open to change late in the design stage.

The best quality public heritage spaces could be highly visible examples that other practitioners can work towards, debate or rebel against – all of which could energise the sector and hopefully perpetuate interest in heritage and archaeology as lively and creative acts. CBDs that are ghost towns over the weekend could instead be outdoor galleries of integrated public art, green space, architecture, music and heritage that provide locals and tourists with a reason to visit these hubs outside of business hours and provide an engine for a 24-hour economy. Having said that, incentives targeted to private enterprise should avoid the trap of 'trickle-down' heritage where only large or homogenous or un-

challenging projects and practitioners are funded - incentives could require joint ventures between commercial and community bodies.

Philanthropy

With a funding model that included philanthropy, public donations, partnerships with universities, tax exemptions, dollar for dollar agreements, corporate investment and application fees – that is, a diverse cashflow – the NSW Government could establish a centre for activating and conserving heritage and archaeology in much the same way as the NSW Art Gallery. There are key issues that affect the entire heritage and archaeology industry that small private consultants, site owners, nor the government alone are capable of solving – we each lack the time and expertise. A 'NSW Heritage Gallery' – better names exist we are sure – could:

- Archival store, curate and display artefacts from archaeological sites – also objects that relate Aboriginal heritage if communities are amenable. Artefacts currently languish in basement storage at shopping centres and apartment complexes, subsequent site owners struggle to understand why they should continue to house them and the public never have access. A unified gallery for artefacts would be funded using the existing system – those applicants seeking to impact the most important historic materials should pro-rata and scale their financial contributions to the gallery. Artefacts currently stored could be donated to the gallery – for a fee.
- Develop an online repository that unites the hundreds of smaller artefact catalogues maintained by individual consultants – again this would reduce double handling, better target existing efforts and funds and make the information accessible to the public and researchers so that more effective analysis could be done with this information.
- Spearhead inter-disciplinary 'public placemaking projects' that would benefit local residents and businesses, tourists and developers. Such projects could revitalise, for example, Sydney's cultural precincts like The Rocks and Circular Quay and complement new infrastructure such as the Light Rail and would dovetail with the LGA Masterplan for Site Interpretation proposed in response to Focus Question 3, 4.
- Develop an online repository for all past, present and forthcoming archaeological and heritage reports. The database would be publicly accessible and always refreshed. This would remove much double-handling in the management of sites and give regulators a single portal to refer to. It could also alleviate Heritage NSW of the burden of maintaining a library of documents so that they can instead focus on permits and compliance.
- Host PhD or Masters students or provide specialist professional development to existing practitioners
- Collaborate with the NSW State Library, NSW Art Gallery and all local libraries or private collectors that maintain collections of historical objects and documents or Aboriginal cultural material.

Taxation and Grants

Unfortunately, AMAC group lack a grasp of the taxation system so our response to Focus Question 6 is limited. Any incentives for private owners should prioritise owners that want high quality outcomes for both built heritage AND archaeology. Current assistance targets owners with built heritage or with sites on the State Heritage Register – but many locally listed sites or undiscovered sites contain State significant archaeology. Those with unregistered sites that contain State significant archaeology have no avenue for assistance but are as deserving of it.

Current assistance also generally excludes archaeology yet many of our clients own State significant historic homes with backyards that are themselves archaeological sites of State significance. Home owners in The Rocks, Millers Point and Dawes Point are between a rock and a hard place – pardon the pun – when trying to adapt aging and poorly maintained buildings because their outdoor space is just as inflexible. As individuals or families, they usually care deeply about their site's built heritage and archaeology, even the legislation that protects it, but they are faced with understaffed, poorly networked or even inexperienced administrators at the State and local level (though please note the heroic efforts of the small team of 'archaeologist-public servants' at Heritage NSW and send assistance their way).

These owners and administrators are the people who deserve the most help. Especially those rare private owners who are capable and willing to also conserve or interpret the archaeology and heritage of their site (publicly or privately).

We often see that the costs of private ownership would be best mitigated not by tax incentives but by earlier and more consistent and better informed heritage advice from planning authorities and better coherence between authorities. A tax incentive of \$5,000 to a private individual may only encourage unscrupulous consultants to increase the cost of their services by precisely that amount. And, if these existing underlying problems are ignored, the government may spend the time and money reinventing the legislation and spend additional funds on grants and still be faced with unhappy private owners because the system is still understaffed and poorly applied no matter how 'simplified' it is from the existing Act.

Focus Question 8: How could tailored heritage protections enhance heritage conservation?

Focus Question 9: How should heritage items that are residential properties be accommodated under a proposed category scheme?

Archaeology is not difficult to manage and there is an already widely accepted tool to tailor its heritage protection – an Archaeological Assessment. A thorough assessment prepared by an experienced researcher and excavator that is published early in a project is the best tool possible to provide tailored protection to our 'buried heritage' and insulates even small residential site owners from a difficult experience with regulators. And yet, even the current level of State and Local administration struggles make it clear to site owners that an assessment is the best way to tailor their experience under the Act. Too often, authorities accept half-hearted statements about archaeology written by people unfamiliar with the subject matter and the legislation or ignore the need for an assessment altogether. Even when professionals from related fields like Heritage Architects produce documents such as Conservation Management Plans or Statement of Heritage Impact or Environmental Impact Assessments – these rarely have input from trained archaeologists and almost always miss opportunities to identify and avoid 'buried heritage.' This situation will continue if an archaeological assessment is not made compulsory for every proposed category of heritage items. From a pragmatic point of view, assessments are a tool to manage risk and select an appropriate approval pathway - many site owners are led astray without one prepared by a qualified assessor.

If categories are used, check that no individual site falls into contradictory levels. If not, many of the private residences throughout The Rocks, Millers Point and Dawes Point could end up in a situation where they are Category 2 as a contributing item to State significant landscapes but also Category 3 as a residential property.

If categories are used, they could protect the most important sites from the least reliable applicants, developers or consultants. Developers that do not fulfil their permit obligations under Category 2 could be barred from working in Category 3 or higher sites.

Focus Question 10: Would greater community engagement deliver a more robust State Heritage Register?

For community engagement to deliver a 'robust' State Heritage Register – it would have to be cultivated, maintained and allowed to refresh. Success would rely on the mechanism that the government provides and whether communities felt that they were represented or that their efforts would result in meaningful action. Any mechanism for engagement should allow for both long term planning and emergency action as well as a chance to reject or mitigate unwanted changes. The State Government may not be the best interface for community engagement – however a joint venture between State Government and Local Councils might work. The best engagement will be 'grass roots' and if special-interest groups are given a way to effect change in a collaborative way this may give good outcomes across a range of concerns. Local Councils are usually those best in touch with local values and existing community action groups so Councils should be involved with or coordinate early rounds of nominations or review for items on the SHR.

Focus Question 11: Would streamlining enhance the listing process?

The Discussion Paper was unclear on what 'streamlining' would actually involve. However, we do believe that the SHR has to be and stay relevant so that it serves culture rather than imposes it. Measures that allow collaboration between government administrators and the public to list and delist sound appealing though the mechanism is crucial. Please refer to our above response to Focus Question 10.

Focus Question 12: How could we improve the current approval permit system?

Focus Question 13: Are the current determination criteria for heritage permits still appropriate?

Archaeological permits are not difficult to obtain or onerous to manage under the current Act. But, excluding those approvals issued by the archaeologists at Heritage NSW, the permit system can be made difficult by willful ignorance amongst site owners and project planners or inexperience within an under-resourced government administration.

Insofar as the current approval system allows these flaws to flourish – then yes, the permit system could be improved. The worst example follows:

We regularly encounter development approvals – issued by statutory bodies that should know better: Local Council, Heritage NSW or DPIE – that allow projects to proceed under the false impression they have the correct permit under the Act. Usually, this 'misleading permit' only refers to Section 146 of the Act which requires a developer merely *notify* Heritage NSW that an archaeological relic was discovered. It does not *permit* them to destroy it. This is the worst possible scenario as it means the project must manage all archaeology at their site as an 'unexpected find' during the midst of their excavation when costs escalate by the day - this is precisely the point at which archaeology becomes the most time consuming, stressful and disruptive to manage under the Act's permit system. AMAC Group spend a great deal of time and energy trying to convince clients to avoid putting themselves in this situation. But if a 'misleading permit' from Heritage NSW or Local Council does not support our advice, clients either destroy archaeological relics knowingly or unknowingly or when they call us to visit site and manage an unexpected find for them it is always an emergency.

Several factors can cause this worst-case situation to arise at any of the planning stages for a project:

- Some projects may believe that by avoiding advice from archaeologists they are free of Section 139(1) of the Act that asks if they have 'reasonable cause to suspect' a relic would be damaged by their work. Even when their site is listed with a Local Environmental Plan.
- Archaeologists are usually brought into projects by Heritage Architects, Planners or Project Managers as subconsultants and sometimes cannot give advice directly to a site owner. It is not always clear if our advice reaches the owner.
- If we are commissioned to give advice – but our assessment recommends that a site needs a permit under the Act and this is inconvenient to certain project stakeholders – our assessments are all too often withheld from the assessing officers at Council or Heritage NSW or DPIE who should be reading our advice before they issue permits.
- By this stage, if the approvals officer is in anyway under-resourced (time, training), then the approvals process itself will either ignore or misunderstand how archaeology should be managed under the Act. Permits issued by the ignorant or inexperienced tend to exclude Section 139(1) and Section 57(1d) or rely only on Section 146 to issue a 'misleading permit.'
- Once a 'misleading permit' is issued, even though the legislation itself is very clear (Section 139(1) and Section 57(1d) require a permit to disturb a *relic* – some clients feel they need only comply with the conditions of their approval instrument. And unless that instrument was written by the Heritage NSW Specialist Services (a small team of tenacious archaeologists-come-public servants) then the instrument is almost always a poor representation of the Act.
- If a client does finally concede to the need for a permit to disturb relics, yes, it can be a time-consuming process. But this is because so much time was wasted early in the project. And, if permit processing times seem long once with Heritage NSW, it is only because they have one chance to get it right – if not, the archaeology is destroyed forever. Also, the assessing officers are a small team for all of New South Wales and should be given more technical support and qualified staff to do their important work.

One of the key points here is that clients will almost always comply with approvals and conditions issued as a development consent from Local Council or DPIE. These instruments are usually: Pre-DA Advice, Development Application (DA) Conditions, Integrated Development Applications (IDAs) State Significant Development (SSD) or Infrastructure (SSI), Construction Certificate (CC) or Occupancy Certificate (OC). However, clients can be inconsistent in their compliance with permits and conditions issued by Heritage NSW: Section 139(4) Exception Notification, Section 140 Excavation Permit or Section 60 Approvals.

If clients are usually so willing to comply with their primary approvals from Local Council or DPIE – and have difficulty with their secondary approvals from Heritage NSW – then make sure that approval instruments from Local Councils and DPIE are better at articulating requirements under the Heritage Act 1977. The desire for compliance is already there – we need to harness it.

If the existing system is retained, provide better and more consistent training and resources to current assessing officers. If a new or amended system begins – along with consistent training and resources – it could require applicants to prove that there is no ‘reasonable cause to suspect’ their site might contain archaeological *relics* or that their work could reasonably avoid damaging them. This should make sure that advice from qualified archaeologists is deliberately sought in the permit assessment stage and made clear to the owner and officer and will hopefully avoid situations where good and early advice is avoided or ignored.

Once assessing officers read our advice – they are usually very good at including it clearly in their permits. The exception to that rule is usually DPIE, where even with written advice directly from archaeologists *and* Heritage NSW we routinely see SSI or SSD consent conditions that are poorly stated or staged which creates confusion and wastes time. We are unclear why this happens but we suspect it could be easily avoided. The archaeologists at Heritage NSW are experienced at balancing the needs of both archaeology and development – we recommend that even in the SSD planning pathway their team should: author final consent conditions, review all archaeological assessments and proposed excavation methodologies and research designs, review all interim or final archaeological reports and review the qualifications of all Excavation Directors. When it comes to archaeology, the SSD planning process would be carried out more smoothly if the Heritage NSW archaeology team were allowed a greater role. They are currently limited to providing only agency submissions and draft conditions of consent. Their presence across both the SSD system and the Heritage Act system would at least ensure that archaeology is planned for and practiced to a consistently higher standard. If the Heritage NSW archaeology team were better staffed and resourced, they could alleviate the pressures on assessing officers at DPIE.

We do not see a need to broaden the Minister’s existing involvement. Unfortunately, Ministers are subject to pressures and scrutiny that may not always be clear to the public nor relevant to heritage itself or in its best interests. Though they are elected representatives, this is not justification for increased involvement as ideally any changes to the Act will increase grass-roots community engagement with heritage that is direct and does not need to be filtered through a supposed parliamentary mandate.

As archaeologists we are satisfied with the current criteria for assessing archaeological significance and the thresholds for managing locally significant or State significant archaeology using permits that escalate in their obligations relative to the likelihood that a development may impact the most important archaeological *relics*.

Focus Question 14: How could we improve heritage consideration within land use planning systems?

Focus Question 15: Are there opportunities to enhance consideration of heritage at the strategic level?

Most Local Government Areas already possess an Archaeological Zoning Plan that was prepared by a qualified archaeologist and the AZP already informs their Local Environment Plan. The LEP is usually

the key land use planning system (sites with State significant archaeology and heritage are also flagged on the State Heritage Register though the LEP also tends to list these sites). The difficulty is usually that the AZPs were produced at a large scale (and can miss details) or were produced decades ago and have not been refreshed (though new historical research has become available since as our local and State libraries and archives are digitising collections or as they receive new research collections by donation or bequest). AZPs could also be better informed by the results of archaeological excavations that have taken place – these results could confirm or question LEP listings.

As in our response to Focus Question 12, 13: Even when sites are listed by the LEP, if the assessing officer is inexperienced with the Act or advice is withheld, even the LEP listing is not enough to guarantee that heritage and archaeology are properly considered.

I also refer the reader to our response for Focus Question 3 and Focus Question 4 where we outline the opportunity for Local Government Areas to develop a community informed Masterplan for Site Interpretation which would enhance consideration of archaeology and heritage at the strategic level by:

- Including them early in the planning process in collaboration with the public
- Linking them to other prized community values such as reconciliation and liveable cities
- Create high quality and meaningful public places informed with heritage and archaeology so there is a clear 'product' for the community of 'customers.'

Focus Question 16: How could heritage compliance and enforcement be improved?

The current system works best when it issues the correct excavation permits (see FQ12) to developers willing to comply and archaeologists with the right experience. A convict era site can only be excavated if the developer provides detailed evidence that their Excavation Director is experienced with convict archaeology and has previously completed their obligations under former permits. This should be maintained. However, Site Owners, Applicants or Developers could be subject to the same scrutiny – if a developer has a poor compliance track record, why should they continue to gain permits? Why not use a compliance rating system or provide Heritage NSW or Councils with a mechanism to ask an applicant for the evidence of compliance or the Final Archaeological Report from their last site before giving them a permit to start digging up a new site. It is often Excavation Directors (consultants) who are hounded for Final Archaeological Reports when it is their clients, the permit holders and applicants, who have ceased to fund the project and are no longer interested in compliance.

Also, per our response to Focus Question 8, 9: If categories are used to sort heritage site types, they could protect the most important sites from the least reliable applicants, developers or consultants. Developers that do not fulfil their permit obligations under Category 2 could be barred from working in Category 3 or higher sites.

Also, per our response to Focus Question 12, 13: Site owners and developers are very good at compliance with their primary approvals from Local Council or DPIE – but are inconsistent with their compliance with secondary approvals from Heritage NSW. If the desire for compliance is already there in the primary approval – we need to harness it and make sure that those instruments are better at articulating requirements under the Heritage Act 1977.

Focus Question 17: How could understanding of state heritage be enhanced?

Please refer to:

- Focus Question 3, 4 which outlines a Local Government Area Masterplan for Site Interpretation to ensure heritage and archaeology are integrated in public places
- Focus Question 5, 6, 7 which outlines a funding model and scope of work for a 'NSW Heritage Gallery' similar to the NSW Art Gallery

Archaeologists also expect that the government could implement these simple measures to enhance State heritage:

- Update the NSW Heritage Manual

- Ask Councils to update Archaeological Zoning Plans
- Run annual workshops for consultants, applicants and the public
- Publish to a public website the 500 word summaries already required for archaeological sites

Focus Question 18: How could we improve heritage tourism or help activate heritage places for tourism?

Please refer to:

- Focus Question 3, 4 which outlines a Local Government Area Masterplan for Site Interpretation to ensure heritage and archaeology are integrated in public places that attract locals and tourists to CBDs beyond business hours and support a 24-hour economy
- Focus Question 5, 6, 7 which outlines a funding model and scope of work for a 'NSW Heritage Gallery' similar to the NSW Art Gallery
- Where heritage sites are 'activated' – and these should increasingly become public and obvious access rather than hidden in the foyers of commercial buildings or basements – they should point to one another in a network using apps, websites, or physical signage and maps (especially signage for those sites that are nearby or are thematically related which would spark interest in tourists already moving around a city – maps could also suggest a route that brought tourists through a popular shopping or dining precinct).

Focus Question 19: How could public heritage buildings be activated to meet the needs of communities?

Each community will have its own needs and heritage spaces should be tailored for them. Governments should ask communities what they need. Part of our existing problem is that governments, consultants and academics dictate what they think is needed. The Masterplan for Site Interpretation response to Focus Question 3, 4 could be the mechanism to answer this question.