

26 September 2018



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## Re: Southern Grampians Shire Draft Heritage Strategy June 2018

Dear Ms Clutterbuck,

Thank you for providing an opportunity to provide comment on the *Southern Grampians Shire Draft Heritage Strategy June 2018* document.

The National Trust of Australia (Victoria) is state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 28,000 members across Victoria. The National Trust maintains a Heritage Register of Significant Places, including buildings, landscapes, gardens and trees. Within the Grampians Shire we have classified 18 built heritage places, 4 landscapes, and 8 trees.

As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that the wide range of natural, cultural, social and Indigenous heritage values of the municipality are protected and respected, contributing to strong, vibrant and prosperous communities.

We commend Southern Grampians Shire for progressing this important strategy, with a view to strengthening the identification, protection, and celebration of heritage in the region. While we strongly support the Draft Heritage Strategy, this submission provides some comments for consideration as the document is finalised.

We note a number of instances across the documentation when capitalisation has not been utilised for 'Aboriginal' and 'Traditional Owner'. It is recommended that capitalisation occurs in every instance of using these terms. We note that NAIDOC week is misspelt as "NADOC" week and that this should be fixed.

### Heritage Studies

With regard to '3.2.2 Update, review and make available heritage material' we note references to the *Hamilton Conservation Study* (1991) and the *Glenelg Shire Heritage Study* (2004). We note another reference to the *Southern Grampians Shire Heritage Study* (2004) on page 8, and question why the *Glenelg Shire Heritage Study* is noted here instead of the *Southern Grampians Shire Heritage Study* (2004).

Given the timeframes that have passed since the Hamilton Study (27 years) and the Southern Grampians Study (14 years) these studies may not be up to date, or adequately identify and protect the range of heritage places within the municipality or the community's expectations regarding the identification, protection and celebration of these places. We recommend that the Shire reviews the questions documented under 1.2 of the Heritage Council's 2012 *Municipal Heritage Strategy: A Guide for Councils*, which states:

*If a heritage study has been completed, there may still be gaps in the information base. For example:*

- Are there geographical gaps in your heritage study? (Are there parts of the municipality which have not been surveyed as part of a heritage study)?*
- Are there any gaps in the types of places which your heritage study covers? (Does the heritage study primarily concentrate on buildings? Does the heritage study address other types of heritage places including structures, gardens, significant cultural landscapes, public art, monuments and places of significance to people from diverse backgrounds? Does the heritage study adequately consider inter-war and post-war heritage?)*
- Is there a need to identify, assess and document places of Aboriginal, archaeological or natural significance?*
- Are there places identified in your heritage study that need to be further researched and documented?*

We recommend that the following Actions be given a stronger priority in the Strategy: "Review Thematic Environmental Histories and heritage studies (1991 & 2004) and undertake gap analysis to identify priority places for future assessment" and "Investigate undertaking Heritage Gap Study (as per priority places list)." Addressing gaps and deficiencies in the citations for the Heritage Overlay should be a key priority for the Shire. These should fall into the current strategy timeframe, preferably short to medium term, and not in the next strategy timeframe as currently documented in the current draft Strategy.

### **Clause 21.05 Built Environment and Heritage**

We note a reference to this clause on page 7, which incorrectly references it as 12.05, which should be corrected. The National Trust suggests that this policy could be reviewed and strengthened. We would be happy to provide further specific feedback on what we think would strengthen this policy, in light of our work with the City of Melbourne in updating their policy as part of Planning Scheme Amendment C258. For instance, we note gaps regarding gardens, trees, demolition of heritage places, and facadism. We strongly recommend that a review of this policy and associated planning scheme amendment be added as an action to the current Heritage Strategy.

### **Draft Action Plan**

Under the heading 'Draft Action Plan' (pages 13-16) we make the following suggestions. As per the guidelines set out in the *Municipal Heritage Strategies: A guide for Councils* we suggest that the columns with the headings 'Resourcing' and 'Progress/Outcome' be added and 'Timeframe' be changed to 'Target Date for Completion'. Consideration should be given to where resources

will come from to fund the important work of the Action Plan. Providing an indication of how actions will be funded will assist in the ongoing implementation of these actions. It is noted that the Heritage Strategy is a document to be used by Council staff, Councillors and the community, therefore the addition of the heading 'Progress/Outcome' will provide different stakeholders a brief understanding of any progress to date and desired outcomes.

We note under '3.1.1 Studies and strategies' (page 8) that there is an ongoing *Grampians Landscape Assessment*, and we submit that more specific actions regarding ongoing work on this assessment should be referenced in the Draft Action Plan, along with its progress and target date for completion. We support the development of a regional interpretation strategy with neighbouring Councils, recognising that heritage values do not stop at municipal boundaries. We also support the Shire in seeking joint-funding to implement recommendations from the Grampians Landscape Assessment and South West Landscape Assessment.

We strongly support the action to establish a Significant Tree Register. With regard to responsibility for this action, this should be developed in partnership with the Planning Unit, providing statutory protection for trees on both public and private land, and not only focused on the Shire's asset management. The National Trust would be pleased to provide further comment and support to the Shire as this important work progresses.

We strongly support the ongoing engagement of the Southern Grampians Shire with Gunditj Mirring Registered Aboriginal Party and other relevant Traditional Owners in early planning for Council led projects; in raising community awareness about Aboriginal cultural heritage and history; and in facilitating cultural heritage activities for the Southern Grampians Shire Reconciliation Festival and National Heritage Week.

We strongly support the Shire in investigating the establishment of a Heritage Advisory Committee, and would be pleased to provide further comment on this action as it progresses.

We are pleased to see reference to the National Trust Heritage Festival in the actions as part of community partnerships. We would like to take this opportunity to invite the Shire to contact our Heritage Festival coordinator, Freya Keam, to discuss how the Shire can become more involved with the program, including as part of our 'Friend of the Festival' program. Freya can be contacted on (03) 9656 9818 or at [freya.keam@nattrust.com.au](mailto:freya.keam@nattrust.com.au).

### **Implementation, monitoring and review**

We consider that the Southern Grampians Heritage Strategy should be a 'whole of Council' strategy with full Council support, and suggest that this should be articulated in document at this point. We note that the strategy and associated Action Plan are to be reviewed every five years. We submit that this should be every four years as recommended in the *Municipal Heritage Strategies: A guide for Councils*. We strongly recommend that the Shire continue with transparent, ongoing and meaningful consultation with stakeholders and the community with regard to the actions documented in the plan.

## Conclusion

Overall we consider that the *Southern Grampians Shire Heritage Strategy Draft June 2018* is worthy of proceeding, noting some suggested amendments put forward in our submission. We support the Southern Grampians Shire in the finalisation of the document as the roadmap to the operation and strategic work of the Southern Grampians Planning Scheme with regard to heritage places over the next 4 years. We welcome future opportunities to provide comment and feedback on the various actions outlined in this Draft Heritage Strategy.

For any enquiries regarding this submission, please contact me on 9656 9823 or at [jessica.hood@nattrust.com.au](mailto:jessica.hood@nattrust.com.au).

Yours faithfully,

A handwritten signature in cursive script, appearing to read 'Jessica Hood'.

Jessica Hood  
Community Advocate Environmental Heritage