

28 May 2020

Roger Teale, Jude Munro AO and Stan Krpan
Co-chairs
Building Victoria's Recovery Taskforce

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Re: Building Victoria's Recovery Taskforce

Dear Mr Teale, Ms Munro, and Mr Krpan,

Thank you for the opportunity to provide feedback on matters relating to the Building Victoria's Recovery Taskforce (BVRT) Terms of Reference.

The National Trust of Australia (Victoria) (NTAV) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 26,000 members across Victoria.

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

We understand that the Building Victoria's recovery taskforce is seeking to identify building and construction projects of state and regional significance across Victoria that are shovel-ready, and to investigate planning and investment opportunities.

We believe that a focus on heritage conservation and adaptive re-use, including modest investment through stimulus measures, has the potential to generate significant benefits for the people of Victoria.

We call on the BVRT and the State Government to commit to the following actions:

1. Prioritise heritage conservation and adaptive re-use projects
2. Expand the Living Heritage Program
3. Invest in the Victoria's Heritage Restoration Fund
4. Increase support for Committees of Management
5. Ensure that heritage is appropriately considered as part of fast-tracking development approvals and streamlining the planning processes

1. Prioritise heritage conservation and adaptive re-use projects

Investment in heritage conservation and the adaptive re-use of existing heritage building stock provides a significant opportunity to realise positive long-term economic, environmental, and social outcomes.

While our current focus is on the Covid-19 crisis, the climate crisis continues. The built environment a major contributor to Victoria's greenhouse gas emissions, and according to

Sustainability Victoria, waste from the construction and demolition industry represents over one third of all waste going to landfill.

International research has shown that upgrading existing buildings is a more climate-friendly strategy than producing new energy efficient buildings.

Adaptive re-use and retrofits of existing buildings reduces greenhouse gas emissions and demolition waste, and capitalises on materials, energy, and sunk carbon already invested.

The Building Victoria's Recovery program therefore offers an unprecedented opportunity to stimulate investment in adaptive re-use projects which not only achieve positive economic outcomes and generate employment, but also deliver strong sustainability outcomes and contribute to the Victorian Government's action on climate change.

Heritage conservation and adaptive re-use also delivers a raft of economic and social benefits:

- Improved tourism opportunities.
- Increased property values.
- Positive contribution to the streetscape and neighbourhood character.
- Employment opportunities for skilled tradespeople.
- Delivers investment in assets which are valued by the community, promoting positive social outcomes.

We therefore encourage the prioritisation of adaptive re-use projects which demonstrate positive heritage and environmental outcomes, rather than just focusing on fast-tracking new construction and greenfields developments.

Investment in Stimulus Measures

The following comments relate to the BVRT's remit to make recommendations regarding Government stimulus through new initiatives or by expanding existing ones. These opportunities for investment in heritage projects strongly align with the Government's call for initiatives which deliver:

- reduced greenhouse gas emissions and improved resilience consistent with the Government's commitments on climate change; and
- improved social and environmental outcomes.

2. Expand Living Heritage Program

The Living Heritage Program, administered by Heritage Victoria, has successfully delivered positive outcomes for places on the Victorian Heritage Register and their communities since 2016.

The matched funding requirements for privately-owned properties also stimulates private investment in heritage conservation.

We call for additional funding to be allocated to the program, and for an expansion of the selection criteria to include projects which provide universal access, up to date amenities, and other retrofitting works required to make heritage buildings fit for viable new uses.

Funding programs for heritage, such as the Living Heritage Program, often focus on conservation works only, but these works can fall short of providing a heritage building that is fit for a new purpose or improved access and functionality.

3. Invest in Victoria's Heritage Restoration Fund

Victoria's Heritage Restoration Fund (VHRF) was launched in late 2013 and is a partnership between the City of Melbourne, the City of Yarra, the City of Ballarat, DELWP, and the National Trust of Australia (Victoria).

The VHRF offers grants to restore eligible heritage places and objects. The funds are overseen by a Committee of Management comprising representatives of the above organisations. The program is administered by a secretariat based at the NTAV.

Unlike the Living Heritage Grant program, the VHRF provides funding for places of local heritage significance which are protected under Heritage Overlays, assisting private owners to conserve and restore their buildings for the benefit of the community.

Funding provided under the VHRF is generally limited to 30-50% of the total value of the works, so the program encourages private investment in restoration works which have a public benefit.

Analysis of grants awarded in one municipality over one financial year shows that a **modest investment of \$100,000 over 9 projects generated \$400,000 in private investment.**

Further investment in the existing VHRF program therefore offers a significant opportunity to rapidly scale up private investment in heritage conservation, generate employment opportunities, and realise economic, environmental, and community benefits.

4. Increase Support for Committees of Management

Additional support should be provided for Committees of Management which have responsibilities for the management of heritage places on Crown land to undertake works and activities in accordance with the *Victorian Government Cultural Heritage Asset Management Principles* (adopted December 2009), including maintenance surveys, cyclical maintenance, conservation projects, and sustainability initiatives.

While the Living Heritage Grants program currently provides funding for Committees of Management to undertake conservation projects for places in the Victorian Heritage Register, we recommend increasing funding and expanding the criteria for applications to include places under the Heritage Overlay.

Supporting this work would secure the future of important government-owned heritage assets, provide employment for businesses in regional areas, and support community-based organisations that care for public assets.

5. Ensure that heritage is appropriately considered as part of fast-tracking development approvals and streamlining the planning process

BVRT Governance

We understand that the BVRT is receiving advice from three Industry Working Groups and is being guided by a Steering Committee involving representatives from industry peak bodies

and unions. We have concerns regarding the lack of transparency in relation to the membership and terms of reference these committees, and request that this information be made publicly available as a matter of priority.

We advocate for an appropriate mechanism to be put in place to ensure that the BVRT receives expert advice on heritage matters under both the *Heritage Act 2017* and *Planning & Environment Act 1987*, and that heritage issues are considered at an early stage of the assessment process for individual projects, and as part of recommendations to streamline the planning process.

While we are pleased to note that the assessment criteria for projects includes social and environmental considerations, there are no clear guidelines for the application of these criteria, and there is a need for transparency and accountability about how these considerations are being balanced with economic imperatives and the interests of the property and development industries.

It is essential to ensure that historic places and the local communities that value them are not unintended casualties of infrastructure and redevelopment projects.

Planning approvals and third-party appeal rights

While we appreciate the imperative to fast-track development approvals and investigate ways to streamline the planning process, it is essential that appropriate heritage approvals are obtained, and that heritage advice is sought by the BVRT to identify potential heritage issues associated with individual projects. All relevant approvals should be in place before planning approvals are publicly announced, noting that even if planning approval is granted by the Minister, heritage approvals may still need to be obtained under the *Heritage Act 2017*.

We do not support the removal of notice provisions and third-party appeal rights for applications affecting places with heritage controls under the *Planning & Environment Act 1987*.

Conclusion

The NTAV would welcome the opportunity to provide advice and support to the BVRT on matters relating to heritage, and I welcome you to contact Felicity Watson, Executive Manager, Advocacy, on 9656 9802 or at felicity.watson@nattrust.com.au with any enquiries.

Yours faithfully,



Simon Ambrose
Chief Executive Officer