



17 April 2026

6 Parliament Place
East Melbourne
VIC 3002

The Senate
Foreign Affairs, Defence and Trade References Committee

Email: conservation@nattrust.com.au
Web: www.nationaltrust.org.au

Via Fadt.Sen@aph.gov.au

T 03 9656 9818

Re: Inquiry into Management of Defence Estate Assets

Dear Senate Committee,

Thank you for the opportunity to provide a submission to the Inquiry into the Management of Defence Estate Assets.

National Trust of Australia

The National Trust of Australia (Victoria) is the state's largest community-based heritage advocacy organisation, representing more than 40,000 members and supporters. We are Victoria's leading heritage and conservation organisation and are committed to safeguarding and activating natural, cultural, social, and Indigenous heritage values, in turn fostering strong, vibrant, and prosperous communities today and for future generations.

Our organisation manages a diverse portfolio of heritage places and brings significant expertise in portfolio management through a heritage lens. Our advocacy is delivered through policy engagement, education, and custodianship of our places. We strive to lead best practice in heritage conservation, management, and public programming.

This submission, made by the National Trust of Australia (Victoria), is endorsed by the Australian Council of National Trusts, the national federated body representing each state and territory National Trust. The National Trusts of Australia (Australian Council of National Trusts) is the national federated body representing each state and territory National Trust. It is the peak heritage body in Australia responsible for advocating for better heritage funding and heritage policy outcomes for the Australian people at a Commonwealth level.

Summary of Position

The Defence Estate includes places of Commonwealth, as well as national, state and local heritage significance. Because of this significance, the heritage values represented within the Estate's built, landscape, moveable, and intangible heritage must be fully understood and integrated into all aspects of planning, management, utilisation, and divestment processes undertaken by those responsible for managing the Defence Estate.

As a custodian of public land with significant cultural values, the Federal Government has a responsibility to follow and provide leadership in best practice heritage and asset management,

which has not been the case to date. The Defence Estate Audit – *Delivering the Future Estate, 2025*, indicates that heritage management within the Department of Defence does not take a holistic and strategic approach and is limited to minimum statutory compliance. There is a lack of internal heritage expertise that is essential for successful heritage asset management, and as a result, heritage considerations are not rigorously, consistently and efficaciously embedded within estate management processes.

We emphasise that heritage is not a barrier to effective asset management, divestment, or development. Rather, when properly integrated into a portfolio-wide management system, it enhances sustainability, decision-making, and long-term capability outcomes.

We do not oppose a reduction of the Defence Estate, and we believe, if approached strategically, it could generate impressive positive and impactful community benefit. To achieve the positive benefits, the preparation for and delivery of the divestment process must be undertaken in collaboration and consultation with key external heritage experts and stakeholders, to ensure that a holistic understanding of all heritage values is incorporated.

Key Recommendations

The National Trust recommends that the Department of Defence:

- 1. Establish a divestment taskforce embedded with multidisciplinary heritage expertise**, to ensure that the process generates the highest quality outcomes including best-practice heritage activation, community benefit, and financial return.
- 2. Establish a dedicated heritage unit, funded and staffed by qualified heritage professionals**, in the Defence Estate team to undertake a comprehensive assessment of heritage values across the Estate (local, state, and Commonwealth), who provide strategic and statutory guidance for built and landscape heritage and collections, and implement consistent policies for management, maintenance, monitoring, and divestment.
- 3. Implement significantly improved asset management processes in parallel with divestment**, ensuring systemic issues are addressed rather than perpetuated, and assets represent excellent heritage management as a core practice – key to any future divestment activity.
- 4. Revise divestment policy frameworks** to enable consideration of options for best public and community uses of surplus Defence land, including to local and state government agencies.

Response to the Defence Estate Audit

The Defence Estate Audit highlights:

- 1. Systemic heritage and asset management shortcomings** that the Department of Defence and Estate Asset team must urgently address.
- 2. An ongoing pattern of reactive, compliance-based management** rather than proactive stewardship.
- 3. A concerning bias against heritage and community advocates** for Defence heritage assets.

Combined, this represents a symptomatic misunderstanding of the Department's role as an asset manager and heritage custodian.

Critical issues requiring action include:

- Lack of internal heritage expertise.
- Inconsistent application of heritage and asset best practice.
- Under-resourcing of heritage assets and Estate maintenance and management.
- Failure to act on longstanding concerns raised in previous reports and by stakeholders.
- Poor management of collections and moveable heritage.

Regarding the Business Process Improvement Recommendations provided in the Defence Estate Audit, we strongly support:

- Business Process Improvement 4 - establishing a centralised asset management system with clear reporting and funding visibility.
- A revised Business Process Improvement 17 - expanding its scope to include all heritage values and requiring consistent, estate-wide heritage policies.

Without addressing these fundamental structural issues, particularly internal resourcing and expertise, proposed reforms and divestment will not achieve long-term success or maximise community benefit.

We call on the Federal Government to publish formal responses to the Business Process Improvement Recommendations provided in the Defence Estate Audit. These recommendations are essential to the improvement of the long term systemic and foundational issues within the Department.

Asset Planning, Management and Utilisation

A review of the current Defence Heritage Strategy (last updated in 2017) referred to in the Defence Estate Audit reveals that it is insufficient as a standalone heritage management framework. It focuses only on Commonwealth heritage obligations and does not address the full spectrum of heritage values across the Estate. Many of the key concerns raised in the Estate Audit stem from this narrow approach to managing heritage values.

Other key concerns identified with management of heritage as revealed through the Audit include:

- An absence of internal heritage expertise in leadership roles.
- An over-reliance on external consultants without internal capacity for review or consistency.
- A lack of policies for collections and museum management.

The current approach to the Defence Estate management reflects inadequate asset management planning. This results in practices leading to asset deterioration, the insufficient use of assets, and a lack of forward planning, policy, and targeted and rigorous action to prevent deteriorating and/or redundant assets. This lack of fundamental and consistent asset management across a large portfolio is disappointing and reflects Departmental under resourcing.

The Audit speaks negatively of community groups, ex-Defence personnel, and volunteers involved in the utilisation, management, support and advocacy of the heritage parts of the Estate.

This is deeply concerning as they play a critical role in supporting Defence heritage sites including through partnerships, site activation, the celebration of site values and public visibility. Therefore:

- The NTAV recommends that the knowledge and commitment of community groups and stakeholders are positioned positively as an asset and they are recognised, respected, and integrated into consultation and management frameworks.

Regarding asset management, it is vital that any underutilised assets and/or significant deterioration across the portfolio is identified, managed and actioned early. Therefore:

- The NTAV recommends the creation and implementation of centrally coordinated whole of Estate cyclical and preventative maintenance regimes, in conjunction with regular and systematic reviews of asset utilisation, third party agreements and community partnerships.

It is also vital that consistently implemented Estate-wide policies and guidelines, as well as communication and training, are integrated as essential factors for sustainable and best practice Estate management. Therefore:

- The NTAV recommends that an improved and more holistic co-ordination and oversight of individual site management and third-party agreements across heritage assets is adopted to ensure that overarching policies, guidelines and agreements are clear, communicated and understood by all parties.

Divestment of Defence Estate Assets

It is recommended that the divestment process across Australia, which includes many heritage assets of varying significance, is informed, transparent, and inclusive, ensuring that all key stakeholders and potential partners are involved in the process. Past examples of divestment approaches, such as the ongoing divestment of the Maribyrnong Defence Site (deemed surplus in 1997 and vacant since 2006), demonstrate the risks of poorly managed divestment processes, including prolonged vacancy, resulting in further deterioration, and missed opportunities for transparency and community benefit.

It is also critical that Indigenous heritage considerations are applied across all sites and not limited to sites where Indigenous heritage has already been formally recognised, namely in the Northern Territory and Tasmania. This includes engaging with local Indigenous leaders and authorities on subjects including Native Title, Sacred Land and Areas of Aboriginal Significance.

We recommend ongoing consultation with ex-Defence personnel, local community groups, industry experts, and Indigenous stakeholders including Indigenous authorities, to ensure that community voices are heard throughout the divestment process and that transparency and public benefit are prioritised within the process. This consultation should be in addition to the current consultation approach being carried out by the Department.

We strongly support the inclusion of local and state partnerships and community benefit options in the Department of Defence divestment policy. This can be assisted by consultation with key community stakeholders as part of the divestment process to enable stronger public benefit outcomes.

Adopting a balanced approach to divestment, including utilising heritage expertise and considering social, cultural, and community outcomes alongside financial return, will deliver better long-term results and a more successful divestment process. To achieve this, the NTAV strongly recommends that at least one heritage expert is involved in the multi-disciplinary taskforce created to conduct the divestment process, to ensure that heritage compliance and heritage values are upheld throughout the process.

Conclusion

The challenges identified in the Defence Estate are systemic and longstanding. Divestment alone will not resolve these issues.

A fundamental shift –towards integrated, well-resourced, and expert-led heritage and asset management practices - is required to ensure a sustainable and capability supporting Defence Estate. Without this shift, the significant heritage values held within the Defence Estate will continue to be at risk, and the opportunities presented by divestment will not be fully realised for the benefit of the Australian community.

As noted previously, this submission, made by the National Trust of Australia (Victoria), is endorsed by the Australian Council of National Trusts, the national federated body representing each state and territory National Trust. The concerns raised in this submission are shared by National Trusts across Australia, reflecting the national importance of proper stewardship of the Defence Estate's heritage values.

The National Trust stands ready to work constructively with Defence to improve heritage outcomes for the Defence Estate.

We would welcome the opportunity to discuss this submission further. Please contact our office on (03) 9656 9844 or at samantha.westbrooke@nattrust.com.au.

Yours sincerely,



Collette Brennan
Chief Executive Officer
National Trust of Australia (Victoria)