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PATRON: The Hon Margaret Reid
AO

Consultation Draft Planning Bill

The National Trust of Australia (ACT) (the Trust) is a not for profit, community organisation whose purpose is to promote the conservation of, and foster public knowledge about, places, objects and issues that are significant to the heritage of the Australian Capital Territory.

We appreciate the opportunity to provide a submission on the draft Bill, and the significant and effective consultation that has occurred to date.

The Trust believes that sound planning and heritage preservation work together. We note that UNESCO, in its publication *The HUL Guidebook: Managing heritage in dynamic and constantly changing urban environments*, contends that:

“In the era of globalization, cities are increasingly competing with one another, both nationally and internationally. Globalization makes cities similar in terms of finance, information technology or patterns of modern urban development, whilst **culture and heritage are the resources which will always distinguish them from one another.**” (<http://historicurbanlandscape.com/themes/196/userfiles/download/2016/6/7/wirey5prpznidqx.pdf> - accessed 10 June 2022)

The Trust supports this key statement of principle and believes that heritage can be a differentiator in terms of attracting new residents and tourists. We note that many great cities and places of the world such as Rome, and the Seine River in Paris, have World Heritage Listing. Canberra can place itself on a similar footing to those cities through planning principles and methods that support the retention and protection of the city's heritage.

ACT Heritage Council submission

The Trust notes and is fully supportive of the submission of the ACT Heritage Council (June 2022) provided in response to this consultation process.

Further specific comments

The Trust is pleased that the objects of the Bill include 'the ACT's biodiversity and landscape setting, including the integration of natural, built, cultural and heritage elements'.

We ask that consideration be given to amending this statement to better reflect the references to places and objects of natural and cultural significance as per the objects of the *Heritage Act 2004* (s 3(1)(a)) and the meaning of heritage significance in s 10.

Additionally, the Trust is concerned that none of the principles of the Bill in section 9 include a reference to heritage or adaptive reuse of heritage places. Adaptive reuse makes sense from a sustainability point of view if a full energy assessment is considered, included embodied energy. The Trust suggests that an additional item (f) be placed under the activation and liveability principles within s 10 (2) that recognises heritage principles and encourages planning to work with heritage to preserve and encourage reuse of heritage places.

The Trust is very supportive of the introduction of district-level planning which we believe offers significant opportunities to recognise and protect key heritage values and places at a local level. We look forward to participating in the development of these strategies.

Consultation

We note the provision in the draft Bill permitting the Minister to make guidelines about the principles of good consultation.

The Trust would encourage the development of guidelines which promote broad-based consultation, including individuals and smaller organisation without the level of professional and paid support available to other stakeholders.

Yours faithfully

A handwritten signature in blue ink that reads "Gary Kent". The signature is written in a cursive, flowing style.

Gary Kent
President
National Trust of Australia (ACT)
15 June 2022