

# CONSERVATION OF AUSTRALIA'S HISTORIC HERITAGE PLACES

Productivity Commission Inquiry 2005

Submission from the Kosciuszko Huts Association Inc. (KHA)

## About KHA

The Kosciuszko Huts Association (KHA) is a voluntary, not for profit organisation that, in partnership with National Parks and Wildlife Services, maintains the heritage values of the mountain huts in Kosciuszko National Park, Namadgi National Park and surrounding areas in New South Wales and the Australian Capital Territory.

There are some 600 financial members of KHA, of which 22 are corporate members representing schools, the Duke of Edinburgh program, walking clubs, four wheel drive clubs and ski clubs. The total number of people represented by KHA would be several thousand. KHA's prime objective is the conservation of "huts" and associated structures in the Australian High Country, for the purposes of retaining their cultural heritage values. KHA was formed in 1971.

Following the loss of some twenty five huts in the January 2003 bushfires, KHA has developed a range of policies aimed at recognising the history and heritage once evidenced by those huts, now lost. Many of these policies, and others relating to management of existing heritage, are being incorporated into the revised Plans of Management for the two national parks.

## Issues

Below is KHA's response to relevant questions posed in the Issues Paper. It has been assumed from the content of the paper that heritage in this context is limited to "built" heritage. Of course there are many other aspects to heritage – personal heritage is important as evidenced for example by people's feelings about events or beliefs. The Aboriginal "dreamtime" and most other indigenous heritage is an example of this, but it is not limited to indigenous culture. The values of the built heritage are intertwined with these other less tangible aspects of heritage, and a building by itself should not be evaluated without these intangible aspects in mind.

### **How are historic heritage places recognised?**

We believe that the current lists **do** adequately recognise degrees of cultural significance and that the factors used are generally appropriate. However, we have issue with the process in which places are put on the various lists, and how the lists are used – this is of major concern. For example, a Commonwealth minister can place the Victorian Alps on the national list for political purposes yet hundreds of other places have been waiting for years (the minimal number of places so far placed on the National Heritage List is a disgrace). A whole town can be considered for listing, as

in Braidwood NSW, to compensate for inadequate planning laws. Heritage listing should not be used for other purposes – this practice degrades heritage conservation as a society-advancing activity.

Also, the different legislation that applies to different lists and the resulting differing levels of responsibility are confusing. The RNE seems to be used as a “catch all” list but has little enforcement attached to it. We believe that the general public have limited understanding of the implications of a building being placed on a “list”.

### **What is the current state of historic heritage places?**

There **is** a need for a survey of heritage places in Australia, including sites where the fabric has all but gone. However, this is a major undertaking and one fraught with difficulties.

We believe that heritage is community based – if the community doesn’t recognise it as heritage, then it probably isn’t. To have a team of “experts” roaming the country searching out “heritage” misses the point. Heritage must emanate from the community. The problem is that a lot of heritage is disappearing while awaiting the community to recognise it. We believe the answer is to better raise awareness of heritage amongst the community, much in the way that the environment has become recognised. Community groups such as KHA could be encouraged rather than have obstacles placed in their way.

However, a properly tasked exercise to attempt to unearth significant unlisted sites would certainly add to the knowledge base. Also required urgently is an assessment of the condition of existing known heritage so that appropriate resources can be put towards its conservation.

### **Assessing the policy framework**

From the point of view of KHA, which is concerned about heritage mostly within a national park setting, it is a great pity that discussion on government involvement in the protection of Australia’s national heritage must be couched in terms of “efficient market outcomes” and “market failure”. That said however, we can see that these matters may be appropriate in other settings and the point is taken that the government coffers are not bottomless and priorities must be established. KHA does not believe that market failures are an issue for heritage on public land, and should not become so as national park funding moves increasingly towards “user pays” principles and economic outcomes.

We are pleased to note that the issues paper recognises that governments may undertake (or facilitate) conservation which is socially viable. We believe that facilitation is the best way for governments to assist as heritage is community based. If a community considers heritage to be worth conserving, then the community should take action to do so. Increasingly, this is becoming more difficult and expensive as legislation, insurance requirements and associated matters such as OH&S obligations impact on voluntary community input. Government could assist in these areas by better recognising community volunteerism in legislation, easing restrictions in the application of legislation and through direct and indirect financial measures.

Government involvement in the heritage of high country huts is mostly through the various national parks services that operate under State legislation. Using Kosciuszko National Park (KNP) as an example, funding is provided to run all aspects of the park, including heritage. As heritage, to date, is not recognised in the same way as other worthy pursuits, such as environment protection and recreation activities, heritage tends to get minimal funding through park operations.

Many park staff at all levels are committed to the heritage in the park, but funding priorities are elsewhere. A heritage study of all huts in KNP following the 2003 bushfires in which some 20 huts were lost has recommended a “one-off injection” of funds for the protection of the remaining huts, but it is difficult to see this occurring. Meanwhile, KHA continues to undertake conservation work to all huts across the park, totally self funded by its members. This only occurs where permitted by park management under quite strict and increasingly costly conditions.

It should be noted that while KHA has been fighting to protect the huts in KNP for 35 years, only recently has park management become aware of its heritage responsibilities. If not for KHA, most of the heritage represented through the high country huts would have been pulled down in the 1970s and 1980s, when they were considered by park managers to be a threat to the environment. Many environmental groups consider that they still are a threat. Apart from a few specific projects, primarily in the ACT, KHA has undertaken this work without any government funding or external assistance.

The draft report of the Kosciuszko National Park Huts Conservation Strategy, commissioned by the NSW National Parks and Wildlife Service (NPWS), and released in May 2005, is a major step forward in State governments and National Parks Services recognising their heritage responsibilities. However, while the words are in place, there is no evidence to suggest that resources will be provided to back up the sentiment.

It is very difficult to quantify cost benefits in the conservation of heritage places. This, of course, is because the benefits are intangible, as stated in the issues paper, and include a sense of history, belonging and community. They have spiritual value, and research and education values. Cost benefits should not be placed on such values, lest we lose them altogether. Governments attempt to use cost-benefit analysis in funding heritage places and this leads to inaction as there is no way to measure the cost. Again, communities should be empowered to conserve and protect their heritage, with governments determining ways to facilitate, not provide some formulaic funding process.

### **Non-government organisations (involvement in heritage conservation)**

An overview of the work of the Kosciuszko Huts Association and its relationship with government, through national park administration, is provided above. The following attempts to succinctly answer some questions in this section of the issues paper.

Without the volunteer efforts of KHA over 35 years, much of the built heritage in Australia’s high country would no longer exist. Even with KHA and local community

effort, land managers and natural disasters have destroyed a considerable amount of this heritage, at a rough estimate at least 80% has gone since 1950.

The obvious strength in NGO involvement in heritage conservation is that it links the community to its own heritage. It also saves governments considerable sums of money, probably in the order of billions of dollars. The weaknesses all emanate from lack of support (not just monetary support) and recognition by governments.

KHA operates under Australia ICOMOS Burra Charter principles, and ensures that relevant land managers do likewise. This is not always easy for a voluntary organisation and standards are not always attained as we would like. KHA reports to relevant State Parks and Wildlife services but we believe that our own record keeping is often more accurate.

An aging volunteer workforce is not a particular impediment to KHA's work. Most problematic is requirements around access to national parks, insurance, OH&S and risk management. The cost of these requirements has risen so much over the past few years that we are close to folding as an organisation after 35 years, despite a range of fund raising activities and (unsuccessful) grant applications being made.

The activities of KHA could be dramatically improved and expanded with minimal government assistance. For example, if we were able to employ a full-time manager KHA would be able to harness the incredible amount of community goodwill for the high country huts that exists across NSW, ACT, Victoria and Australia generally. The leverage potential is enormous. The main impediment is lack of time by volunteers with full time employment and family responsibilities. Existing government funding could be better targeted to achieve such an outcome.

### **The new national heritage system**

The new system has had no effect on the activities of KHA. We have been considerably affected by the NSW NPWS strengthening insurance and OH&S requirements over the past 2 years, but that does not appear to be linked to heritage legislation. The NPWS has certainly taken its heritage responsibilities more seriously over the past few years but again, we doubt that is connected to the new heritage system per se.

In general, there is still considerable community confusion over roles and responsibilities, laws and practices. Whether the new national system has provided governments with an overarching policy framework is a matter for senior bureaucrats, but it is not evident to the public and only academically to heritage practitioners. This will remain the case while heritage is not given any priority in governments' policy agendas, particularly the Commonwealth.

### **State/Territory policy frameworks**

The questions raised here by the issues paper are difficult to comment upon. They are probably directed at government policy officers. My personal comment however, is that despite studying heritage management at post graduate level, including the national policy framework, I still find it almost impossible to determine where roles

and responsibilities sit within the federal framework. I suggest that these processes be made more transparent and a communication strategy be developed that explains them more simply. Perhaps one of the impediments to the implementation of a national framework is that those charged with the implementation have a confused understanding of their role caused by its complexity.

### **Policy framework efficiency**

We are somewhat surprised to learn from the issues paper that current heritage approaches separate the conservation of historic, indigenous and natural heritage places. Heritage encompasses all these (and other) aspects and can only be managed in an holistic way. Some values will be more prominent than others but all need to be taken account of, if only to be able to appropriately exclude them from a process.

As for conflicts between public policies on various types of heritage conservation, this only applies where some heritage has received more attention than others. We do not see this as a negative, rather those aspects that have little emphasis placed on them now need further work. The issues paper may be attempting to bring forward an issue about indigenous heritage having more emphasis placed upon it than European heritage, or vice versa. If this is the case, we do not believe that there is a problem. We are talking (hopefully) of Australia's heritage, and again, all aspects must be taken into account with appropriate action and resources provided following proper assessment. Australia's Burra Charter adequately encompasses all heritage approaches and if they are followed correctly, there should be no issue here.

### **Heritage listing**

There are too many lists. Heritage is a national responsibility and there should only be lists for Australia, not individual states and territories, private organisations and heritage types. The criteria and thresholds for listing would be workable in this context. They provide some flexibility but this becomes problematic when so many different jurisdictions manage the lists.

The potential costs of conservation should **never** be included in listing criteria. This would totally destroy the whole concept of heritage. Priorities for management will take account of costs, but the lists are not a list of management options, they are lists of heritage value, which does not have a cost associated with it. Options for management should arise from the list, and be prioritised, but not form part of the list.

The Commonwealth, States, Territories and local government should all put management policies in place based on national listing. There should be a management policy framework to provide consistency across jurisdictions but with flexibility to take account of local conditions such as resource availability and State legislation. There should be no recognition of non-official lists in the legislated environment.

## **Funding and other assistance**

These issues are covered above under various headings. The over-riding principle should be that heritage emanates from, belongs to and should be managed by the community. In summary;

- Governments should *facilitate* community involvement in heritage conservation,
- Legislation and consequent regulation should take account of the special issues facing volunteer groups,
- More targeted grants should be made available to small community organisations and less to larger entities that tend to build their own inefficient bureaucracies,
- Advisory services and technical assistance needs to be well resourced and easily accessible,
- A public education strategy on heritage values and management is imperative, and
- Tourism and other fund raising activities should be a consequence of good heritage management, not a reason for it, and should not be included in developing government funding formulae.

Mark Cleghorn, President

And the Committee of KHA

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