

# Engineers Australia's Submission to the Audit Office of New South Wales

Performance Audit - Overseeing Heritage Assets  
February 2023



ENGINEERS  
AUSTRALIA

# Engineers Australia's Submission to the Audit Office of New South Wales – Performance Audit - Overseeing Heritage Assets

Author: Neil Hogg and Louis Field  
© Institution of Engineers Australia 2023

All rights reserved. Other than brief extracts, no part of this publication may be reproduced in any form without the written consent of the publisher. The report can be downloaded at [engineersaustralia.org.au](https://engineersaustralia.org.au)

Engineers Australia  
11 National Circuit, Barton ACT 2600  
Tel: +61 2 6270 6555  
Email: [policy@engineersaustralia.org.au](mailto:policy@engineersaustralia.org.au)

[engineersaustralia.org.au](https://engineersaustralia.org.au)

# Contents

Introduction.....	4
About Engineers Australia.....	4
Contact for more information .....	4
1. General Comments.....	5
2. Targeted Questions.....	6
2.1 Is there sufficient information available to understand Heritage NSW's requirements and processes relating to state heritage listings or amendments? .....	6
2.2 Does Heritage NSW provide sufficient support or guidance for conserving, maintaining and/or adaptively re-using state significant heritage assets? .....	7
2.3 Does Heritage NSW work effectively with the owners of state significant heritage assets to assist and ensure their compliance with heritage management obligations? .....	8
Summary .....	8

# Introduction

Engineers Australia welcomes the opportunity to provide a submission to the NSW Audit Office performance audit of the oversight and administration of heritage assets of State significance.

Engineers Australia has participated in the recent review of the NSW Heritage Act and associated processes and documentation. In our presentation to the Parliamentary Committee we stated, along with many other heritage organisations, that we were generally satisfied with the current heritage legislation in NSW yet that its application and resourcing can be significantly improved. It is therefore timely that a performance audit of the oversight and administration of heritage assets of State significance is undertaken.

## About Engineers Australia

With more than 115,000 individual members, Engineers Australia is the profession's peak body. We are the voice of the profession and exist to advance society through great engineering. We support engineers in the pivotal role they play in shaping the future of Australia: creating safe, successful, and sustainable communities.

Australia's engineering heritage is important because only by understanding how things were done in the past can we improve on and design better for ourselves and future generations.

All around us are engineered structures, processes and products which support our modern society. Everything from the water supply, our sewerage systems, electrical grids, internet, telephone, clothing and processed foods are the result of engineering. Whether the products themselves or the production facilities which create them, almost everything we use has its origins in engineering.

Engineering Heritage Australia (EHA) groups operate in every state and territory of Australia. These groups are involved at the local level, promoting the conservation of engineering heritage and in representing Engineers Australia on heritage matters. EHA works with other heritage and cultural organisations to promote the value of all types of heritage and the continuing role of engineers in preserving all forms of technology, technological knowledge and constructed heritage artefacts.

## Contact for more information

Engineers Australia welcomes the opportunity to engage further with The Audit Office of New South Wales and assist with its performance audit of the oversight and administration of heritage assets of State significance.

Please do not hesitate to reach out if you would like to discuss this further. You can contact us at [policy@engineersaustralia.org.au](mailto:policy@engineersaustralia.org.au).

# 1. General Comments

Although the NSW Heritage Act is inclusive in its scope, the State Heritage Register is incredibly unbalanced.

Of the 1746 items registered as being of State significance on 1<sup>st</sup> January 2023:

- The overwhelming majority are buildings, structures or landscapes.
- Fewer than 30 are items of movable heritage (anything that can be moved).
- They are mainly current or former government assets.
- They are mainly pre-1900 structures.
- They are mainly iconic items or items with high aesthetic significance.
- There are very few “mundane” or “everyday” items with which most of the community were intimately associated.
- There are very few aboriginal items.
- Intangible heritage (eg. knowledge and skills) has not been included (we acknowledge that this is a relatively new concept).

There is a perception that heritage is all about grand old buildings and places. We believe that this is, in part, a result of the processes, priorities and resources of Heritage NSW.

Engineers Australia and its members are actively involved the conservation of all forms of significant cultural heritage – movable and immovable, tangible and intangible. We believe that there is an opportunity to achieve a more balanced recognition of NSW’s cultural heritage.

## 2. Targeted Questions

### 2.1 Is there sufficient information available to understand Heritage NSW's requirements and processes relating to state heritage listings or amendments?

The current information has been developed over 40 years to give the results it does. Engineers Australia proposes several improvements to ensure a more diverse and inclusive heritage list:

- Ensure that all publications and discussions use the inclusive term “item” instead of the commonly used and restrictive terms “building” or “place” (from the NSW Heritage Act - *item* means a place, building, work, relic, moveable object or precinct.).
- Ensure that all supporting material includes terminology, diagrams and examples of all types of heritage (currently almost all refer to buildings and landscapes). The material is generally of very high quality – it needs to be more inclusive and less focussed on buildings and places.
- Ensure that all significance criteria are equally applied. Currently aesthetic significance appears to be disproportionately valued.
- Engage with “general public” custodians to make the processes more “user-friendly”. There are over 100,000 custodians of operational technological heritage in NSW (and others of houses and buildings). The current listing processes are robust but not easily navigated by “amateurs”. This has resulted in the nomination process being dominated by the heritage “establishment” – those organisations with the knowledge and resources to research and present the nomination in a format most likely to ensure acceptance – thus perpetuating the current imbalance.
- Engage with organisations with specialist expertise. Engineers Australia has offered to assist by reviewing older listed items and by conducting preliminary assessments of nominations of technological and industrial items and to suggest “filling gaps” in the list. This offer is intended to apply specialist knowledge and reduce Heritage Office workload.

## 2.2 Does Heritage NSW provide sufficient support or guidance for conserving, maintaining and/or adaptively re-using state significant heritage assets?

Heritage NSW does not appear to have sufficient resources to deliver acceptable support in several areas. There is a lack of expertise in some areas and either insufficient staff or competing priorities in others. Engineers Australia proposes the following comments and improvements:

- For items in the care of large organisations (government and former government organisations, large institutions such as National Trust, ICOMOS, Religious organisations, property management companies) the process works well. They have the resources and the expertise to manage the item appropriately – and they “speak the same language”.
- Increase the diversity of knowledge and experience within Heritage NSW, for example, in the areas of movable, technological, operating and intangible heritage.
- Increase support for smaller organisations and individuals to emphasise the benefits of listing. They often do not understand the requirements and many are not prepared to have their item listed in the belief that the requirements are too restrictive or the outcomes not worthwhile.
- Increase training for heritage officers and advisors. Some are rigid in their application of the requirements and better outcomes can be achieved through negotiation and flexibility.
- Provide a leadership role for all NSW heritage. Whilst not directly associated with State significant items, local governments and their officers/advisors look to Heritage NSW for guidance. Heritage NSW can play a vital role in the training and continuing development of local heritage advisors and processes.
- Acknowledge that the Burra Charter is not always the most appropriate guide to conservation, particularly for items of movable heritage maintained in operating condition. Significance 2.0 and other specialist guidelines are more appropriate in these situations.
- Advocate on behalf of heritage custodians with other government departments. Regulations of other departments applied without consideration can have adverse (and unintended) consequences on heritage items. Heritage NSW can assist with negotiations between the heritage organisation or individual, the regulator and specialists such as Engineers Australia to devise a solution suitable to all parties.

## 2.3 Does Heritage NSW work effectively with the owners of state significant heritage assets to assist and ensure their compliance with heritage management obligations?

Many organisations have worked extremely well with Heritage NSW, particularly the large well-resourced organisations (e.g., Transport for NSW). However, a large amount of Heritage NSW resources is employed with administrative work associated with planning and development applications (buildings and land). This reduces the resources available for other vital heritage management.

The main issue is that the Heritage Act can be over-ruled by State Significant Projects without appropriate consideration. We recognise that this is a legislation issue, yet this tends to weaken the authority of the Heritage Office.

Furthermore, there is currently no effective mechanism to ensure that privately held State significant items are appropriately maintained – for example where the owner is incapable of meeting obligations due to cost. This is currently beyond the capability or scope of Heritage NSW.

Greater training of heritage advisors and heritage professionals at all levels is needed. There is a tendency to focus on the elements that can be controlled - hence extended arguments over the paint colours - while significant items are being destroyed or deteriorating through neglect.

## Summary

Engineers Australia recognises the dedication and commitment to conserving NSW heritage of the Heritage NSW's staff. They have inherited a culture and processes developed over many years. We believe that there is an opportunity to address the current imbalance in NSW State significant items by including all forms of heritage – movable and immovable, tangible and intangible, from all eras and representing all parts of society.

We believe that this can be an exciting and once-in a generation opportunity to engage and enthuse many diverse organisations and individuals and to activate many more heritage items. Engineers Australia and its members offer their specialist knowledge and skills to assist Heritage NSW.





ENGINEERS  
AUSTRALIA