THE NATIONAL TRUST OF AUSTRALIA (NEW SOUTH WALES)
POLICY ON LEVELS OF HERITAGE SIGNIFICANCE

PREAMBLE

In his seminal *The Conservation Plan* James Semple Kerr discusses levels of significance –

“The way degrees or levels of significance are expressed in a conservation plan is important. Neutral terms such as ‘high’ and ‘low’ or those on the ladder above should be used. These relate only to the assessment process. There is a current fashion for the use of ‘local’, ‘regional’, ‘state’ and ‘national’ as this enables some government agencies responsible for heritage to say that places of local significance must be administered at a local level and so on. Relating such management issues to the assessment process leads to administrative muddle and a loss of integrity in the process, particularly as government policies and political convenience will require places to be moved from one administrative level to another and back again. In assessing levels of significance it is better to avoid the terms local, regional, state and national altogether as they now come loaded with meanings irrelevant to the assessment process.”

In March 2003, conservation architect Sean Johnson presented a talk to the National Trust in the Wyatt Conservation Series entitled ‘The Geographical Fallacy in Heritage Assessment.’ The talk highlighted the problem of ‘state’ and ‘local’ heritage designations. These were put in place for administrative purposes but are now often incorrectly interpreted as levels of significance.

For those professionals carrying out heritage assessment there are serious problems and a state of confusion. According to the NSW Heritage Office’s 2001 publication, *Assessing heritage significance*, ‘State significance means significance to the people of NSW’ while ‘Local significance means significance within the local government area’. These meanings were further defined in the 2008 publication *Levels of Heritage Significance*, prepared by Claudine Loffi for the NSW Heritage Office. According to this document: ‘All levels of heritage are important’ and ‘Local, state, national and world significance is not about ranking, it’s about context’.

Approximately 1% of statutory heritage-listed places and items in New South Wales are listed on the State Heritage Register under the provisions of the Heritage Act, 1977 as having “State Heritage Significance” and their development is determined jointly by the NSW Heritage Council and the appropriate local government authority. The remaining 99% of heritage listings are termed items of ‘local significance’ with their development determined by local councils. State Heritage Register listed places cannot be demolished. Local heritage listings have no such protection and Councils are only expected to consider heritage impacts when determining development proposals, including demolition. So it makes no sense to say that the difference between state and local is ‘not about ranking’. This is the administrative muddle explicitly warned against by the late J S Kerr (quoted above).

Johnson concluded his talk calling for a more neutral grading system, properly recognising significance levels as set out in the Burra Charter, independently of the tier of government administering development control.

POLICY

1. The National Trust rejects the NSW administrative system of ‘state’ and ‘local’ heritage listing which fails to clearly record the level of heritage significance of a place or item.

2. The National Trust calls for the present administrative listing system to be replaced with a simple Grade I, Grade II system of heritage significance designation.

3. The National Trust calls for the adoption of the UK heritage system, where all items have the same degree of protection while the level of required consultation with Statutory planning agencies varies.

4. The National Trust calls for the appointment of an expert panel of heritage professionals to re-write heritage manuals/guidelines.
5. The National Trust will liaise with other interested bodies, such as the Australian Institute of Architects, to jointly lobby for the changes proposed above.

6. The National Trust will publicise this policy and produce a Position Statement promoting the changes proposed.

Author: Sean Johnson, Noni Boyd and Graham Quint
Approved by National Trust Board: June 2016

---

i The Conservation Plan, James Semple Kerr, originally published by the National Trust of Australia (NSW) 1982, now published by Australia ICOMOS 2013

ii The Geographical Fallacy in Heritage Assessment, Wyatt Conservation Series Talk, Sean Johnson, 6 March, 2003

iii The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, Australia ICOMOS 2013