

Anne D. McConnell
*[Consultant - Cultural Heritage
Management, Archaeology &
Quaternary Geoscience]*

ABN No. 33 085 257 371

GPO Box 234
HOBART, Tas, 7001
ph (03) 62 391494
email annemc@aaa.net.au

2nd March 2015

Ms Natasha Exel
Committee Secretary
Legislative Council
Parliament House
Hobart, Tas, 7000
Email: tec@parliament.tas.gov.au

Submission – Built Heritage Tourism in Tasmania Inquiry

Dear Sirs/Madams,

Thank you for the opportunity to provide a submission to the Legislative Council's Inquiry into Built Heritage Tourism in Tasmania.

My submission is based on my residence in Tasmania for some 27 years, and over 30 years' experience as a professional cultural heritage practitioner in a variety of public and private sector contexts.

I have an archaeology heritage background and have worked in Tasmania for over 25 years in cultural heritage (both Aboriginal and historic heritage), initially for Forestry Tasmania (then the Tasmanian Forestry Commission), then subsequently primarily as a heritage consultant. I am a long term member of Australia ICOMOS, and have served on its Executive Committee. I have also served on the Tasmanian Wilderness World Heritage Area Consultative Committee, on the Tasmanian National Parks and Wildlife Advisory Council, and have been the Cultural Heritage representative on the Arts Industry Training Board.

Much of my work has touched on the identification and assessment of regional heritage and heritage places, and provision of policy for their management. Many of the places I have worked on have had ongoing tourism use or potential use. These places include Port Arthur, Sarah Island, Cascade Female Factory, Cynthia Bay, Mount Wellington, Cataract Gorge, Bagdad Valley, Bruny Island, Recherche Bay, the Abt Railway, west coast mining sites and related heritage, rural heritage places, and Mawson's Hut, Antarctica. I have also visited numerous heritage tourism sites in various overseas countries.

My submission, as follows, responds to each of the six terms of reference in turn, but is preceded by a brief summary of the key points in my submission.

Please note that in the following commentary, wherever I use the term 'heritage tourism' this applies to built heritage tourism as well as to broader heritage tourism.

Summary of Key Points

- I believe that Tasmania has considerable potential for built heritage tourism above and beyond the limited number of places that are currently promoted for built heritage tourism; and that Tasmania's heritage tourism potential also extends well beyond its built heritage (ie, buildings) to its archaeological and cultural landscape heritage.
- In my view this potential can best be recognised through an informed, pro-active strategic approach. This should not be imposed, but should respect the rights and interests of heritage owners and local communities.
- Consideration of heritage tourism opportunities should be a collaborative effort by a range of parties, including state and local government, heritage practitioners, tourism industry and heritage owners.
- To ensure the survival of Tasmania's historic heritage (which is irreplaceable), and to ensure the longevity of a heritage tourism industry, it is critical however that all heritage tourism respects the values (including settings) of heritage tourism places and is sustainable (ie, does not adversely impact on the heritage being promoted/used).
- There are existing important principles, guidelines and policy that will assist in achieving this goal. Additional policy however will be required, in particular a policy on environmental and heritage sustainable tourism. Mechanisms for effective and evidence based review (ie, based on monitoring and sound heritage audit principles and practices) will also be essential. Sound management practices will also be required, including appropriate policy and actions in management plans, conservation plans and in local government planning schemes.
- The current trend to soft policy (eg, Tourism 21), deregulation and approvals streamlining will ultimately have a detrimental effect on the heritage, which will lead to direct negative impacts on heritage tourism viability. It is not possible to have heritage tourism without a quality heritage asset.

1 The current and future potential contribution that built heritage makes to tourism in Tasmania

- 1.1 Tasmania has an extraordinary historic heritage in the Australian context. This is due largely to the long time period represented and the relative lack of overprinting by later development compared to other Australian contexts. In term of its time depth the Tasmanian historic heritage extends from late 1700s exploration sites in Southern Tasmania, late 1700s-early 1800s sealing and whaling heritage, and early colonial settlement heritage in both urban and rural contexts; to 1800s to mid 1900s expansion covering convict heritage, agricultural heritage, mining heritage, timber industry heritage, and the expansion and development of regional centres; through to 1900s industrialisation.

This heritage is remarkably preserved. Although much of this heritage is now in ruins, these ruins are well preserved and can tell the significant and interesting stories of Tasmania's, and often a much broader, essential history.

- 1.2 Although the built heritage is an important component of Tasmania's heritage, on its own it has limited potential for heritage tourism as it can only tell a very small part of the historical story, and there are only so many historic houses that any single tourist wants to visit. This I think is exemplified by the ongoing tourism interest in convict sites such as Port Arthur and Sarah Island, which are primarily archaeological sites, while the National Trust has struggled to maintain visitor

numbers at their historic houses, even though these are well managed and interesting.

For Tasmania, I believe that greatest heritage tourism potential lies in considering the wide range of historic heritage in Tasmania together; ie, not just the built heritage, but also:

- the high quality, relatively abundant heritage landscapes (eg, the early rural landscapes of the Norfolk Plains and Derwent Valley; the general English feel of many rural areas of Tasmania (which has drawn visitors to Tasmania for many decades); a small number of surviving apple orcharding landscapes; early exploration landscapes such as Recherche Bay, and Adventure Bay on Bruny Island; the convict landscape of Macquarie Harbour; or well preserved urban heritage precincts such as Battery Point in Hobart).
- The abundant, rich archaeological sites representing much of Tasmania's history of development from settlement, and ranging from significant visitable individual sites, to site complexes and landscapes of sites (particularly in relation to historic mining (eg, the Zeehan area), or scenic tourism (eg, Mount Wellington)).
- Objects in museums, which although collected, help tell another part of Tasmania's history, and to tell the history in another way. Tasmania has two major significant museums with major and varied collections (ie, the Tasmanian Museum and Art Gallery and the Queen Victoria Museum and Art Gallery) as well as numerous small local museums. Museums can also be used to educate and interest people about places and events that they cannot visit – for example the Tasmanian Museum and Art Gallery and Australian Antarctic Division collections of material related to Australia's history in Antarctica are arguably the two most comprehensive such collections that exist.

- 1.3 In relation to heritage tourism potential, I believe that the widest possible range of opportunities should be considered. This should reflect an amalgam of potential tourist uses combined with what visitors are interested in, and should aim to give visitors a valuable and rewarding experience (ie, one in which new things are learned and appreciated, and there is an aesthetically pleasing experience, a socially pleasing experience, and a responsible experience). Exploitation of visitors is to be avoided. Tourism should be based around the history and stories the place/s represent.

On this basis potential tourism uses might include the following, or combinations of these:

- House (and grounds) visits,
- Heritage accommodation or food (or broader activities if compatible with the historic uses)
- Other building or building complex visits,
- Significant archeological site or site complex visits,
- Walking tours (thematic, by locality; guided or self-guided),
- Drive tours (thematic, regional; guided or self-guided),
- Museum visits,
- Promotion of regions/heritage landscapes with heritage values,
- Celebratory events,

- Hands-on volunteer conservation activities (note – the scope for this is limited).

- 1.4 I would also argue that while there are a number of built heritage places being used for heritage tourism, to date the approach has been limited and largely reactive or a long-term continued use (eg, Port Arthur). This suggests that for Tasmania's heritage to be effectively used for tourism, a pro-active approach of exploring opportunities, recognising synergies between heritage types and developing strategic level guidance will be critical. This will assist in providing tourists with a suite of varied and interesting heritage tourism opportunities, spread the opportunities regionally and help heritage tourism operators develop appropriate opportunities that will be commercially viable.
- 1.5 The current and future potential contribution that built heritage can make to tourism in Tasmania however is dependent on the survival of that heritage and consequently its sound management.

Today in Tasmania significant heritage that has tourism potential is being lost because we do not understand the heritage of the State. Two examples of this are within Hobart and regionally. Hobart has an extraordinary level of preservation of its early colonial heritage: Sullivans Cove is still a largely Georgian Port, many Hobart CBD streets have 19th century building streetscapes, and from only 0.25m below the current ground surface in central Hobart lies the extraordinarily well preserved remains of early Hobart (its first buildings, its first flour mills, its early bridges and roads, even hoof prints in buried road mud). This heritage is largely unrecognised and is being destroyed daily by development. At the regional level, the heritage of much of Tasmania is still unidentified, and again as a consequence is being slowly destroyed without identification or assessment. Further identification is essential to protect significant heritage, including heritage that can add to Tasmania's heritage tourism potential (see Item 6.7, below).

It can also be lost because tourism is not managed properly. Sound management of heritage tourism requires a number of mechanisms to be put in place. These are discussed under Term of Reference 6, below.

2 The role of government

- 2.1 In my view the State government should be the lead party and authority for the management of all heritage tourism in Tasmania. I would see the role of the State government as essentially a guiding, coordinating and monitoring role.

In undertaking this role, it is important that the government heritage agency and Tasmanian Heritage Council have a major involvement. This involvement should be greater or equal to other interests, in particular to that of tourism (see item 3).
- 2.2 In undertaking this role, the government must have regard to heritage conservation and the standard accepted guidelines and practices for this, in particular *The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (The Burra Charter, 2013)* (see also Item 6.3).
- 2.3 As noted above (Item 1.4), I believe it is important for good heritage tourism in Tasmania to be based on a strategic approach. It would seem that the State government would be the most suited coordinating and managing such an approach.
- 2.4 A specific role of State government other than policy and strategy development, guiding, coordinating and monitoring, should be promotion.

- 2.5 In my view local government has a role in heritage tourism. Local government should be considered as a key stakeholder, hence involved in developing policy and strategic frameworks that affect their local government area.
- 2.6 Both the State government and local government should have a role in ensuring adequate heritage protection through planning. This will help ensure the preservation of significant heritage generally as well as for heritage tourism.
- 2.7 Neither the State government nor local government should have a commercial interest in private heritage tourism ventures.

3 The role of tourism organisations

- 3.1 In my view tourism organisations should be considered as a key stakeholder and be consulted in relation to heritage tourism for their expertise in relation to tourism.
- 3.2 However, although tourism organisations have a legitimate role in heritage tourism, their operation to date in relation to heritage tourism and broader tourism indicates that they at present have little expertise in heritage or heritage tourism and have had no substantive involvement in ensuring environmentally and heritage sustainable tourism (as demonstrated through Tourism 21). Given this, it would not seem appropriate for them to take a lead role in relation to developing policy, strategy, other frameworks, approvals processes or accreditation in relation to heritage tourism. These roles are seen more appropriately as the roles of State government (see Term of Reference 2, above).
- 3.3 I am also aware of the recent *Parks 21* agreement that gives the Tourism Industry Council of Tasmania (TICT) a partnership role with the Tasmanian Parks and Wildlife Service (PWS), and authority over tourism matters. As the TICT is composed of commercial tourism operators with potential interests (and in some cases existing interests) in tourism related commercial enterprises, it has a significant conflict of interest in this role, hence in my view this partnership is highly inappropriate and is counter to good governance. A similar partnership or other high level advisory, monitoring, assessment or auditing roles in relation to heritage tourism would also result in a significant conflict of interest. As such it is entirely inappropriate that tourism organisations be given key decisions making roles in relation to heritage tourism.

4 The role of heritage organisations

- 4.1 Heritage organisations with professional expert membership have significant and broad based professional expertise that is extremely relevant to the development and long term management of heritage tourism in Tasmania. As such they should have a major stakeholder role in relation to heritage tourism

The key Tasmanian groups which have this professional expertise are Cultural Heritage Practitioners Tasmania, Australia ICOMOS¹ and the National Trust. All have had a long term presence in Tasmania (over 20 years), consequently have a long term perspective. It is also the case that these organisations have some (but not a primary) actual or potential commercial interest in heritage used for tourism, hence have or may have a commercial conflict of interest in some cases (ie, the National Trust is a heritage owner, and members of the other two organisations may earn money from time to time, or work for, heritage tourism ventures).

¹ Please note that I am a member of both these organisations.

In my view therefore the appropriate role of these organisations is primarily as advisory parties for the development of strategic approaches to heritage tourism, for heritage tourism planning generally, for ensuring heritage sustainability, and for setting monitoring and auditing and regulatory regimes and operator accreditation standards. Other roles may include providing training or advice on training for heritage tourism operators, advice on individual heritage tourism properties, and being participants in any advisory or consultative bodies.

- 4.2 Tasmania also has a number of locally based heritage groups. While these groups rarely have professional expertise amongst their members, they have considerable, often unique, local knowledge. Such groups should also be considered stakeholders in relation to heritage tourism.

Such groups (including museum groups and local history groups), where they are formally constituted groups, should be consulted in developing a strategic approach to heritage tourism in Tasmania and in developing regional approaches. They should also be used for developing heritage tourism content, in particular for local histories.

5 Any relevant considerations in other jurisdictions

- 5.1a Heritage tourism in Tasmania must consider heritage owners. Heritage owners are a key stakeholder group whose interests must be considered in the development and promotion of heritage tourism.
- 5.1b It is critically important that heritage owners are able to freely choose whether to use their heritage for tourism and in what way (although it is equally important that their choices do not compromise heritage values), and that heritage tourism is not imposed upon them.
- 5.1c There may be synergies or potential synergies between various private heritage tourism places and enterprises that should be recognised, including in strategic development.
- 5.2a Heritage tourism in Tasmania must consider the needs of, and impacts from heritage tourism on, local communities. Local communities must therefore be consulted in relation to local heritage tourism enterprise. This consultation must be genuine and take into account legitimate community concerns.
- 5.2b Potential impacts on local communities can range from localised impacts such as increased traffic and noise, or a reduction in privacy; to changed traffic conditions and local access which have a negative impact on local residents; to loss of local commercial amenity (replaced by tourist focussed commercial amenities); and, at the extreme end, to a local environment (including town) which is totally subsumed to tourism interests where the local community feels left out, ignored and uncatered for (Strahan is an example of where this happened).
- 5.2c Local community members often have significant historical knowledge about heritage places and local history which may be useful for heritage tourism, and this knowledge should not be ignored.
- 5.2d Heritage tourism enterprises that employ local people are to be preferred to those that employ outsiders (note – this may not always be possible depending on location or the type of service required).

- 5.3 In undertaking heritage tourism, the government, the tourism industry and heritage owners need to be mindful of, and to respect, relevant national and international obligations, for example the Federal government obligations under the Environmental Protection and Biodiversity Act in the case of nationally listed places, and the obligations under this Act and also the World Heritage Convention and World Heritage Operational Guidelines in the case of World Heritage.

Unfortunately, there is a recent trend to increasingly ignore these higher level obligations in Australia and in Tasmania, seen in the moves to devolve decision making from the Federal government to the State government; deregulation generally to promote tourism and other development under the guise of cutting so-called green tape; loss of expert government staff at the State and Federal level in cost cutting drives; and the lack of funds generally to properly assess and monitor environmental impacts. In relation to the Tasmanian Wilderness World Heritage Area (TWWHA) the elimination of the TWWHA Consultative Committee and the recent 2014 Draft Management Plan are examples inappropriate deregulation and loss of valuable, balanced decision making mechanisms. It is critical that expertise and checks and balances remain in place to ensure good governance and sound heritage management.

Note – Local government is considered in Term of Reference 3, above.

6 Other incidental matters

Much of the following comment reflects the need for a responsible and sustainable approach to heritage tourism (or which can be summed up in the maxim that ‘there is no such thing as a free lunch’).

- 6.1a Heritage tourism will fail in the longer term unless heritage tourism is sustainable and a quality experience (both with respect to the heritage used for the tourism and the nature of the visitor experience).
- 6.1b Allowing the heritage that is being used to be negatively impacted through tourism will in the longer term effectively ‘kill the goose that laid the golden egg’ and hence is an unwise and irresponsible direction to take. That historic heritage is a non-renewable resource is an additional compelling reason to look after heritage tourism places. There is also a heritage conservation obligation to maintain cultural heritage in its present or better condition to transfer on to future generations that needs to be observed.
- 6.1c Heritage tourism is more, or should be more, than preserving the shell of places in order to take tourists there and charge an entry fee (ie, an opportunity solely or primarily to make money). Tourists want, and deserve, value for money, an authentic experience, to learn about places and the past, honest presentations and honest stories that do not trivialise the past, and a sense that there is more to what they are being offered than making money. This is all important for heritage presentation generally as well.
- 6.1d To provide a quality experience it is essential to provide an authentic experience, and to achieve this the heritage place itself must be authentic as well as the way in which it is presented. Preserving authenticity is also a key heritage conservation objective (refer the *Nara Document on Authenticity*, ICOMOS 1994).
- 6.1e Integrity is also an important consideration in presenting heritage places for tourism. The integrity of a heritage place is important in presenting authentic heritage and for visitors to be able to understand and appreciate a heritage place.

- 6.1f As part of providing a high quality experience, being able to present the heritage accurately and authentically, and as good heritage practice, it is important that the setting of heritage places also be maintained. The setting is the immediate visual and/or historic landscape context in which a place occurs.
- 6.2a To achieve the above it is essential to have good policy, planning and sound management practices for heritage tourism, and a commitment to heritage, history and culture, and its presentation. Sound management practices will be required in a range of areas and at a range of levels, including in management plans, site master plans, conservation plans, interpretation plans and in local government planning schemes.
- 6.2b I strongly recommend that, to ensure good heritage tourism management, heritage tourism in the State be underpinned by a policy for ‘heritage sustainable tourism’ that applies statewide; the development of which is coordinated by the State government.

A policy on environmental and heritage sustainable tourism should include provision for mechanisms for effective and evidence based review (ie, based on monitoring and sound heritage audit principles and practices).

- 6.3 To achieve the above, it is essential that accepted existing and potential principles and guidelines for heritage management and heritage tourism be used as a basis for heritage tourism. In relation to Tasmanian heritage tourism key such principles and guidelines include:
- *The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (The Burra Charter)*, 2013.
 - *Successful Tourism at Heritage Places*, 2011 (guidelines - the Australian Heritage Commission & CRC Tourism).
 - Various ICOMOS International charters and policy documents, in particular:
 - *The ICOMOS International Cultural Tourism Charter*, 2002.
 - *The Nara Document on Authenticity*, 1994
 - *Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas*, 2005.
 - Various key principles for heritage conservation², in particular:
 - The Precautionary Principle
 - The Principle of Intergenerational Equity
 - The Principle of Intra-generational Equity
 - The Principle of Community Involvement
 - The Principle of Transparency of Decision-Making.

- 6.4 To achieve the above it is essential that heritage tourism takes the approach to heritage conservation and management that is taken in Australia and promoted in the *Australia ICOMOS Burra Charter* and the *Tasmanian Historical Cultural Heritage Act 1999* – that of values based management.

Values based management in essence takes the approach of understanding what is significant about a heritage place and then managing and using the place in a way that will retain its heritage significance. This is a logical approach which promotes

² These principles are summarised in Attachment 1 of this submission. These principles are widely recognised in natural and cultural heritage conservation.

sustainability, and is increasingly the approach being undertaken internationally. It fits well with Tasmania's tourist attracting reputation for being 'green'.

- 6.5 To achieve the above it is essential that planning instruments such as various legislation and local government planning schemes are revised to provide for sustainable heritage tourism. There are a raft of issues around current planning (including in the new planning schemes that are being rolled out at present) that precludes this, including in the areas of recognition of historic heritage, the requirements for listing for protection, division of heritage properties and exemptions that do not allow for adequate heritage values protection.
- 6.5 To achieve the above it will be very important to have a collaborative approach to the development and management of heritage tourism in the State. This will require a collaborative and consultative approach between different levels of government, heritage experts, tourism experts, heritage owners and local communities. This should be government led. (Refer Items 2, 3, 4 & 5).
- 6.6 Many small heritage owners struggle to fund essential heritage repairs, let alone do the necessary work to develop a property for heritage tourism, including preparing a conservation plan, minor restoration or provision of the necessary infrastructure. Some financial assistance to small tourism heritage owners to ensure they can undertake a sensitive and sustainable heritage enterprise is therefore advocated – eg, funds for preparing a conservation management plan and/or for basic maintenance and repair of heritage fabric, low interest loans for startup, free preliminary conservation advice from the State heritage agency).
- 6.7 To achieve a sound, long-term strategic approach it will be important to have a better understanding of the range and nature of Tasmanian heritage values that could be used for heritage tourism. To this end I strongly recommend that the program of regional heritage studies (started but not completed for the State) be completed. This will require government funding, but these studies can be used for broader management not just heritage tourism purposes.

Please do not hesitate to contact me should you have any questions regarding my submission.

I am happy for this submission to be made a public document.

Yours sincerely,



Anne McConnell

[Consultant - Cultural Heritage Management, Archaeology & Quaternary Geoscience]

ATTACHMENT 1 – KEY PRINCIPLES FOR SUSTAINABLE HERITAGE MANAGEMENT

Precautionary Principle

Where there is reasonable risk of unacceptable or irreversible environmental damage from a development or management proposal to natural and cultural values the risk should be avoided or reduced.

Principle of Inter-Generational Equity

This generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

Principle of Intra-Generational Equity

The policies and decisions that affect current generations must incorporate social equity measures in order to ensure the equitable distribution of costs and benefits.

Principle of Community Involvement

Decision-making processes should provide for broad and meaningful community involvement on issues that affect them, without being dominated or determined by particular sectors or interests.

Principle of Transparency of Decision-Making

The framework and processes for decision-making related to management should be transparent, and the bases of decisions should be accessible to the public.

The above definitions are based on those provided in the Tasmanian Wilderness World Heritage Area Management Plan 1999.