

CULTURAL LANDSCAPES CHARETTE

BACKGROUND PAPER

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1.0 Introduction

This background paper has been prepared for parties attending the Heritage Office cultural landscapes charette on 29th August 2003. The paper aims to provide attendants with some information relating to the purpose of the charette. This paper explores the role of the Heritage Council of NSW and the Heritage Office in relation to the protection and management of cultural landscapes. The definition of cultural landscapes is also discussed, with a focus on the current tools for identification and management. Current issues for cultural landscape protection and management are also shown to be influenced by the current approaches for cultural landscape management in NSW.

2.0 Purpose of Cultural Landscapes Charette

Over the last twenty-five years, there has been unprecedented expansion within Australian major cities. Urban sprawl on the outer Sydney fringes continues due to high migration to urban centres, changing demographics and household sizes and improved road transport. Some of this development has been strategically planned at a state level. However, other development control rests with local councils outside the broader planning framework, which address infrastructure, amenity, quality of life and crucial environmental issues.

Satellite cities within Sydney are merging closer and closer together. Communities lament the loss of open space, cultural landscapes, rural playgrounds and amenity – loss of the green corridors and spaces that surrounded our city and loss of some of the most fertile farming lands in NSW.

Cultural landscapes include homesteads and farmlands, as well as remnant native vegetation, Aboriginal sites and places, wetlands, early settlements, disused cemeteries, defunct industrial complexes and so on. These cultural landscapes preserve cultural values and ecological diversity, while offering economic gain through continued agriculture and tourism and considerable scenic and amenity value to local areas and daily life.

Although the identification of scenic landscapes has occurred since the 1960s, there has been no long-term strategic overview policies to systematically identify and manage important cultural landscapes. Some endeavours have been undertaken to identify these cultural landscapes,

however, policies and tools for management have lacked development and are yet to be shared with, and integrated into, comprehensive planning strategies across all levels of government.

The Heritage Council of NSW has identified the depletion of cultural landscapes as an important issue threatening the cultural values and lifestyle of our cities. They have requested that the Heritage Office address this issue.

The Heritage Office has invited key stakeholders including local councils, state government agencies, heritage experts, planners, and the National Trust (NSW) to a charette on cultural landscapes to identify issues and actions for addressing cultural landscape management in NSW.

3.0 Objectives

The objectives of the charette are to:

- Provide an open forum where heritage and cultural landscape experts and government agencies responsible for cultural landscapes, can gather to debate the issues, and define the constraints and opportunities for managing cultural landscapes;
- To identify models and share examples and case studies of leading practices in managing cultural landscapes across NSW, Australia and New Zealand;
- To develop ideas for consistent approaches to managing cultural landscapes across NSW;
- To identify specific actions that lead to positive outcomes and impacts for cultural landscapes;
- To determine how cultural landscapes fit with the sustainability agenda, particularly its interrelatedness to the physical and social/cultural environments, intergenerational equity, and intercultural equity; and,
- To provide an opportunity for equitable participation and contribution amongst key stakeholders.

4.0 Focus of Charette

The focus of discussion at the charette will be on the mechanisms for identification and management of cultural landscapes. For the purpose of the charette the Heritage Office recognise that cultural landscapes are important and valuable. However, it is acknowledged that definitions for cultural landscapes must still be agreed across government in NSW and Australia generally. **The definition of cultural landscape will not be a focus of the event.** The discussion is not aimed at “what we value”, but instead at “how we manage these values”. Considerable research has been undertaken on the definition and identification of cultural landscapes. The aim of the charette is to identify potential **actions for management** of cultural landscapes.

5.0 Outcomes & Impacts

The information and discussion generated from the charette will be used to inform the Heritage Council of NSW on a defined series of outcomes and actions that aims to improve the current management framework and status quo of cultural landscapes in NSW. The outcome of this may

include measures such as a policy and strategy for the Heritage Council, a cross government policy and/or local government initiatives.

A Heritage Council policy document for example, would aim to promote and clarify the importance of cultural landscapes in heritage conservation, particularly in the professional heritage community and government agencies. It might also outline the Heritage Council's objectives, policy and directives for cultural landscape identification and management. Furthermore, it would aim to provide strategic guidance ensuring a consistent approach in decision making about cultural landscapes to Heritage Office staff and promote a consistent approach by the Heritage Council, within the Heritage Office and by local government. The policy document would also aim to assist other state agencies including planning authorities, local government and developers in their decision-making processes.

The policy and strategy would aim to promote and clarify the importance of cultural landscapes in heritage conservation, particularly in the professional heritage community and government agencies.

The charette will also inform intergovernmental relations and whole of government actions when planning for the management and protection of cultural landscapes. It is anticipated that the discussion will also inform local government on options for cultural landscape management.

As part of developing its strategy and policy on sustainability, the Heritage Office, intends to explore and develop co-operative measures to facilitate the protection of these special places. Measures being considered include:

- undertaking a study of NSW's key cultural landscapes;
- creating tangible links between tourism and land management;
- identifying existing management tools and strategies for the protection of cultural and scenic landscapes;
- adopting different strategic approaches to planning to achieve improved protection and management, eg including cultural landscapes as a type of environmentally sensitive land under the EP&A Act;
- improving mechanisms for local and State Government consultation on planning and development proposals that affect such landscapes;
- revising existing guidelines to better facilitate the long term sustainability of cultural and scenic landscapes;
- exploring the range of incentives to land owners to encourage the maintenance of these qualities;
- developing indicators of cultural landscapes to be included in environmental impact assessment and
- raising public awareness through specific educational initiatives.

The importance of strategic planning in considering cultural landscapes will contribute to the Heritage Councils' proposed policy on sustainability (including the draft Heritage Council policy on Wind Farms) and assist in establishing the role of the Heritage Council and Heritage Office as bodies with key roles in achieving sustainability.

Ultimately, the impact of this policy and strategy will be better protection of cultural landscapes in NSW and improved understanding of their importance by the community.

6.0 The Role of the Heritage Council of NSW and the Heritage Office with regard to Cultural Landscape Management

The *Heritage Act 1977* aims to “conserve the environmental heritage of the State” (Heritage Act, 1977) by protecting the cultural and natural significance of heritage items in NSW. The Heritage Council of NSW administers this Act, and is the principal NSW statutory authority on cultural heritage matters. It is also a consent authority and statutory consultee on environmental heritage issues and assessment processes under the *Environmental Planning and Assessment Act 1979* and in relation to issues defined in the *Local Government Act 1993*, the *Strata Schemes (Freehold Development) Act 1973* and the *Strata Schemes (Leasehold Development) Act 1986*. The Heritage Office is the government agency supporting the Heritage Council of NSW.

The Heritage Act 1977 (Section 4) defines a heritage item as a “place, building, work, relic, moveable object or precinct.” A place is defined as “an area of land, with or without improvements.”

The mission of the Heritage Office and Heritage Council of NSW is *helping people conserve our heritage*. As the state government body for heritage, it is the role of the Heritage Council to assist stakeholders and the community to determine the identification and management process for heritage items, including cultural landscapes, of state **and** local significance.

The statutory role of the Heritage Council provides the strength to impose regulations for the management of heritage items including cultural landscapes. Important also is the recognition and promulgation of these important landscapes, and the values attributed to each, within the community.

Through both legislative and educative mechanisms, the Heritage Council and Heritage Office have the role of managing the processes for the identification and management of cultural landscapes, and are responsible for supporting and encouraging the community to value their landscapes.

7.0 The Burra Charter

The work of the NSW Heritage Office is also strongly influenced by the *Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS, 1999). The Heritage Act 1977, and Heritage Council policies are aligned with the principles in the *Burra Charter*. The *Burra Charter* (1999) defines place as “site, area, land, landscape, building or other work, group of buildings or other works, and may include components, contents, spaces and views.” Setting is defined as “the area around a place, which may include the visual catchment.”

The Heritage Office recognises the setting of a heritage item (which may extend beyond the identified curtilage) may contribute to the significance of the place. Appropriate management tools are required to manage that significance. Relationships **between** the item and landscape (outside the identified curtilage) may also be an important part of the item’s significance and requires management to conserve significance.

8.0 Defining Cultural Landscapes

The idea of cultural landscape is not new was first defined by American geographer Carl Sauer in 1929. “What is new is the recognition of landscapes as heritage entities containing features and processes requiring protection, conservation and management” (ICCROM 2003). The thinking behind cultural landscape, their protection and their management, is provided at Annexure A. The flexibility of landscape as a concept is argued by some academics as being central to understanding it.

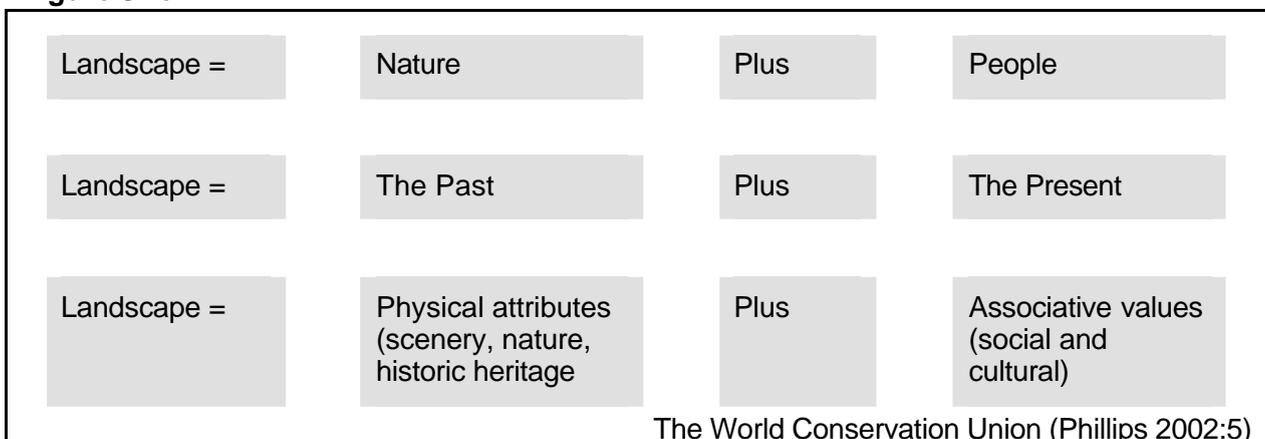
One of the reasons that the concept of landscape is beginning to prove so useful is that it is a concept in between. At a time when simple determinisms are breaking down, and the boundaries between disciplines are continually being breached, it is useful to have a concept that is free from fixed position, whose meaning is elusive, yet whose potential range is all-encompassing.

(Morphy, in Bender 1993:205)

Olwig (in Bender 1993) goes on to argue that the concept of landscape has provided a context from which to discuss national identity. In understanding our landscape as different from others, we are able to depict the elements of our culture that make us unique. It is our *sunburnt country*, with *lands of sweeping plains* that we wholly identify as being Australian. Not only is it through poetry that the Australian cultural landscapes have been identified, but through paintings, music, history, and conservation movements to name but a few.

The World Conservation Union (Phillips 2002) depicts the relationship between culture and landscape in Figure 1.

Figure One:



The World Heritage Committee (in Phillips 2003) defined cultural landscapes as areas that: “are illustrative of the evolution of human society and settlement over time, under the influence of physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal.”

In the 1996 *Australian State of the Environment Report* it was recognised that (AHC 2002:1): Much of Australia may be regarded as cultural landscape because of the traditions and practices of Indigenous peoples over thousands of years. Immigrants since the first

European settlement have added further layers of historical evidence and social significance to the natural landscape.

(Jane Lennon in Australia State of the Environment 1996)

The Australian Heritage Commission (2001:1) consider that
“*cultural landscape* is applied to areas of landscape including landscapes where natural features have special meanings to people such as traditional Aboriginal Australian landscapes, to highly modified or developed landscapes. That land may have continuing use or may be a collection of extant remains.”

To ensure a consistent approach by the Heritage Office with the Australian Heritage Commissions and World Heritage, three categories of cultural landscapes are adopted (WHC 2003) in Figure 2.

Figure 2:

Designed	Clearly designed landscape designed and created intentionally by man. This embraces garden and parkland landscapes constructed for aesthetic reasons, which are often (but not always) associated with religious or other monumental buildings and ensembles.
Evolved	<p>This results from an initial social, economic, administrative, and/or religious imperative and has developed its present form by association with and in response to its natural environment. Such landscapes reflect that process of evolution in their form and component features.</p> <p>They fall into two sub-categories:</p> <ul style="list-style-type: none">▪ a relict (or fossil) landscape is one in which an evolutionary process ended at some time in the past, either abruptly or over a period. Its significant distinguishing features are, however, still visible in material form.▪ continuing landscape is one which retains an active social role in contemporary society closely associated with the traditional way of life, and in which the evolutionary process is still in progress. At the same time it exhibits significant material evidence of its evolution over time.
Associative	The inclusion of such landscapes on the World Heritage List is justifiable by virtue of the powerful religious, artistic or cultural associations of the natural element rather than material cultural evidence, which may be insignificant or even absent.

9.0 Current Identification and Management Tools

International Tools

- World Heritage Listing
- United National Educational, Scientific and Cultural Organisation (UNESCO) are currently putting together management guidelines for cultural landscapes;
- The World Conservation Union (IUCN) promoting the concept of Protected Landscapes and has guidelines for their identification and protection.
- European Landscape Convention has been signed by 18 countries. It recognises, identifies and protects the importance of cultural landscapes.

National Tools

- Register of the National Estate – Australian Heritage Commission (non-statutory for non-Commonwealth owned places)

State Tools

- State Heritage Register – Heritage Council of NSW
- Register of the NSW National Parks and Wildlife Service
- State Environmental Planning Policies
- Regional Environmental Plans
- Heritage Agreements

Local Tools

- Local Environmental Plans, including schedules of items/landscapes
- Development Control Plans
- Zoning controls
- S.66B Covenant restrictions over title

Non Government Tools

- Australian Natural Heritage Charter (non-statutory)
- The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance
- Register of the National Trust (NSW)
- Regional agreements (e.g. indigenous traditional owners and other stakeholders)

Other tools

- Conservation Management Plans (can be linked to SHR listings)
- Plans of Management (for parks and other protected areas)
- Tradable development rights
- Covenants
- Title restrictions

10.0 Key issues surrounding cultural landscapes identification and management

10.1 Valuing cultural landscapes

'To value' is culturally defined, thus cultural landscape conservation itself is of value to some cultures and not to others (Alanen & Melnick 2000). The value within cultural landscapes is also specific to the cultures that affect it, or could potentially affect it.

In NSW, there are many values associated with our landscapes: natural, economic, spiritual, leisure and intrinsic to name but a few. Values can be ascribed to local, regional, state, national and international communities.

A wealth of literature has been written on the identification of cultural landscapes. Yet the issue remains - values are context specific, thus identification and management must also be context specific. To date discussion has been largely focused on the definition and identification of cultural landscapes rather than focusing on the management of cultural landscapes.

By articulating and understanding the complex and interrelated values represented through cultural landscapes, a richer and more supporting process for identification and management can be conceived. "Guidelines and management strategies should address the particular protection needs of each type of value and its physical expression" (Lennon 2001:18).

There is a need to create a 'better fit' between current planning approaches to changing landscapes and heritage values. Quality of life is the important outcome for planning and must consider the needs of the community. These needs include heritage values - values that should be preserved and understood.

Culture and landscape are highly interconnected. Culture is born from the landscape, as we shape our beliefs and values around the resources and setting that supports us. As such, we view nature through a culturally determined image. Cronin (as cited in Alanen and Melnick, 2000:21) articulates the views of several scholars in stating

"that the natural world is far more dynamic, far more changeable, and far more entangled with human history than popular beliefs about the 'balance of nature' have typically acknowledged... the evidence reveals that nature is a 'profoundly human construct'."

Conflict arises when people with differing values attempt to use the same landscape and its resources in incompatible ways (Hardesty 2000). The concern here is not then the technical management of landscapes, but the political processes and change required for landscape conservation (Mayne-Wilson 2001).

The question remains: What do we value about cultural landscapes? Whose values matter the most? What values do we want to protect? What is the best way of preserving and interpreting these values?

While indigenous Australians have long valued the landscape in its totality, the wider community do not yet connect the origin of their values and beliefs to the landscape. Parks are conserved for

their natural heritage assets, and local authorities are focused on visual amenity and historic structures (Lennon 2001).

As a result of this lack of recognition for these important connections there has been very little funding towards cultural landscape management and protection in the past. Lennon (2001) sites various potential funding sources for landscape management in local government, the Heritage Council of NSW, Commonwealth Tax Incentives, Open Garden Schemes, or carefully considered tree planting and revegetation schemes with Landcare.

10.2 Identification of cultural landscapes

Cultural landscapes have been studied through many different disciplines. Each have brought their own thinking and assumptions when analysing cultural landscape value and management (Head 2000). Environmental scientists and physical geographers, for example, consider cultural landscapes to be the anthesis of natural landscapes – shaped and affected by material modification by people. Cultural geographers on the other hand, see landscapes as “transformation of social and political ideologies into physical form” (Duncan and Duncan 1984, in Head 2000:4). Archaeologists understand that the use of the different parts of the landscape is structured by the needs of the social system. While other scholars, such as historians, understand the landscape to be ‘a medium to be read for the ideas, practices and contexts constituting the culture which created it.’ (Ley 1985, in Head 2000:4)

Past thinking has attempted to position different views on landscapes along a linguistic and managerial spectrum. However, Melnick (2000) suggests that to conceive of a spectrum can be harmful to the sustainability of the landscape. A holistic and complex understanding of the various cultural and political values enables a deeper understanding of the changes in the landscape.

Appropriate timing for cultural landscape identification is also essential. Cultural landscape identification often occurs late in the planning process (Walker 2001), resulting in reactive, rather than proactive cultural landscape management. Walker (2001) recommends that planners consider cultural landscapes early in the piece. Planning should seek to retain cultural landscape values. Planning should also be done in consultation with heritage specialists and the local community, who understand the landscape.

10.3 Characteristics of cultural landscapes

There are various characteristics of a cultural landscape, which differentiate it from other heritage items or landscapes. The IUCN (Phillips 2002) have identified 26 characteristics of a cultural landscape/seascape in its guidelines (Figure 2).

Figure 3:

IUCN Characteristics of a Cultural Landscape
A cultural landscape or seascape:
1. is concerned with both people and their environment;
2. is concerned with a range of natural and cultural values;
3. focuses on areas where people/nature relationships have produced a landscape with high aesthetic, ecological, biodiversity and/or cultural values, and which retains integrity;

4. is both a type of protected area with combinations of special qualities, and a management process to guide change;
5. reflects a visionary and pro-active approach, aiming to enhance values rather than simply to maintain or protect existing assets;
6. views communities, and their traditions, as fundamental to the success of the approach: therefore stakeholder and partnership approaches are required, e.g. co-management...;
7. recognises the value of, and the need to support, the stewardship role of the private landowner or manager (including that of Land Trusts or similar bodies);
8. usually involves management arrangements that are determined by local circumstances and needs, and resolved through decision-making at local government or community levels;
9. places a special emphasis on effective land use planning;
10. depends therefore on the presence of transparent and democratic structures which support peoples' active involvement in the shaping of their own environment;
11. brings social, economic and cultural benefits to local communities;
12. brings environmental, cultural, educational and other benefits to a wider public;
13. requires that all management activities be integrated, and promote sustainability;
14. can be used to help resolve conflicts over resource management;
15. can offer models of sustainability for wider application elsewhere in rural areas; and
16. like all protected areas, requires effective management systems, including setting of objectives, planning, resource allocation, implementation, monitoring, review and feedback.

(Phillips 2002:13-13)

It is also important to remember that unlike traditional built heritage structures, cultural landscapes exist both as an artefact and as a system; that is, it is both a process and a product (Alanen and Melnick 2000). A cultural landscape will always comprise of at least some natural elements, meaning that it continues to evolve and change, and it involves many layers and shapes (Mayne-Wilson 2001).

“The measurement of landscape change, as distinct from archaeological or architectural transition, focuses on both shorter and longer periods of time. Likewise, a landscape may be both a system in itself and also part of a larger system”

(Alanen and Melnick 2000:16).

Lennon (2001:17) argues that cultural landscapes are inherently at risk in planning for conservation management because of its numerous components that contribute to its “richness and diversity through layers of various components contributing to themes, periods and patterns.”

In the conservation of cultural landscapes, it is important to understand the dynamics of the complex cultural values inherent in the natural system, and the complexities of the system itself, for effective planning, management and intervention of the landscape.

Activity surrounding cultural landscapes in the last two decades has focused on the simplification, rather than clarification, of values inherent in cultural landscapes (Alanen and Melnick 2000). This has resulted in the corresponding simplification of the responses to those values. “The reliance of

codification... has the potential to negate the very idiosyncratic landscape qualities that set one place apart from another.” (Alanen and Melnick 2000:17).

10.4 Boundaries of cultural landscapes – Land Tenure

Defining where a cultural landscape begins and ends is also a contentious issue in landscape management. Not only is it difficult to define where the values begin and end, but land outside the boundaries can be interpreted by communities as being of less value than those lands within – leading to less care being given to components of the landscape outside its boundary (Mayne-Wilson 2001). Consistently the reason for the division of boundary may be grounded on reasons other than heritage.

“Boundaries may also seem at times to be haphazard to a casual observer because they often do not follow conventionally mapped features of the landscape. Decisions on boundaries relate to both the other listing components, the reasons for classification and the need for appropriate management”

(Mayne-Wilson 2001: 14)

Mayne-Wilson (2001: 14-15) has identified five types of boundaries:

- **Literal boundaries:** A landscape isolated within a different type of landscape, which shares few qualities. Boundaries are clear and easily defined by cadastral features or land tenure boundaries. E.g. scientific or historical sites and urban landscapes.
- **Natural (Biophysical) boundaries:** Physical landscape elements/structures maybe an appropriate boundary. E.g. a river gorge maybe bounded by enclosing walls.
- **Ecological boundaries:** Relate to the biophysical boundaries and the ecological processes of importance.
- **Scenic boundaries:** “Where scenic values are important, the ... boundary may be most appropriately placed to encompass the visual catchment containing those scenic qualities of heritage value... In this case the physical boundaries may be rather complex and diffuse, and may yet extend beyond the visual catchment because of the likelihood of environmental influences from further afield altering the scenic quality within the catchment. An example is the Jamison and Kebumba Valley LCA [Landscape Conservation Area] where water quality above the Blue Mountain Escarpments was important to the scientific and scenic qualities of the escarpments and valleys in the long term, and so these areas were included in the LCA, although outside the visual catchment.”
- **Non-continuous boundaries:** “Examples are both ‘group listings’, where a number of landscapes are part of a biophysical region are amalgamated... and instances where a quality of heritage value is discontinuously distributed in space, either naturally or by isolation resulting, for example, from intervening land practices. In these cases, important values may attach to the continuity of natural, visual or historic values between these isolated sites. A non-continuous boundary (containing the landscape feature of note but not the intervening area) may be appropriate especially if no valuable recommendations for the intervening area can be made. Examples are the Cumberland Plains Vegetation Remnants LCA and the Gosford Hills LCA.”

Cultural landscapes often extend beyond land tenure boundaries. The identification of values within a cultural landscape should be identified firstly through historical research, **and then** compared to the features on the ground, rather than the reverse, which is often the case (Lennon

2001). Management strategies should consider the relationship between the heritage item within the curtilage and the landscape that contribute to its significance outside that identified curtilage.

10.5 External forces

There are many forces existing outside heritage conservation and cultural landscapes that threaten good heritage management outcomes. Global environmental issues for example, may threaten cultural landscapes, and are outside the scope of planners and decision makers at a local or state level.

Globalisation, economic pressure and rapid development, also threaten the existing or ongoing mix of land use practices, which support the maintenance of many landscapes.

The challenge that exists at this time is not to add value to cultural landscapes, but to add value to the processes of land management that underpin the cultural landscape (Phillips 2003).

11.0 Situational Analysis

There are currently thirty-eight items listed on the State Heritage Register for their cultural landscape significance (Annexure B). Initial searches identify at least 1000 cultural landscapes identified in Local Environment Plans (Annexure C). However, it is anticipated that there are hundreds of other heritage items, either not listed or not recognised for their cultural landscapes. Management of these items varies, with some managed and promoted as popular tourism venues (Lord Howe Island Group, Everglades), while others have no management regime at all.

In the last few years, cultural landscapes have been identified as *heritage at risk* (ICOMOS 2001). Increased urbanisation in NSW, particularly on the coast and edges of the major metropolitan areas (Sydney, Newcastle and Wollongong) is inevitable due to immigration, migration from rural areas, and general population growth. It is frequently quoted in the press that Sydney, is currently required to increase its population by 100 000 per annum.

Concerted efforts to consolidate urban and suburban areas of Sydney have provided some relief to the pressures of growth at the city edge (40% of new urban development is *fringe development*). However, it is recognised that some land release for housing is required. In planning for this, the Heritage Council requires that appropriate and early consideration to heritage values must be factored in, as required by the *NSW Environmental Planning and Assessment Act 1979*.

In addition, the Heritage Office believes that conservation of heritage values associated with cultural landscapes will have positive economic, environmental and social benefits to the community will play an important role in achieving sustainability, amenity and quality of life.

In preparation of this charette, the Heritage Office has undertaken a survey of participants and discussed this issue with a number of heritage landscape experts. This information along with recent Heritage Office experiences in cultural landscapes has resulted in the initial identification of the following key issues for the management of cultural landscapes. These issues are merely preliminary findings and will be developed and discussed along with other issues at the charette.

1. There is an ongoing misconception that **heritage is a 'dot on the map'**, consisting only of isolated buildings or objects. Section 4 of the *Heritage Act 1977* considers a heritage *item* to include any *place, building, work, relic, moveable object or precinct*, which may be of *historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic* value.

The concept of a *historic environment* assumes that much of the environment has cultural value. Planning within the *historic environment* has a different starting point than the *dot on the map* approach that in which each value has to be individually identified and managed. The *historic environment* model acknowledges and understands the relationships between the various values, be they ecological or cultural. While, the *dot on the map* approach inevitably seeks to sieve out what is valuable and fit it within a new plan. The *historic environment model* also enables change, whilst protecting the heritage values.

2. **Cultural landscapes are not comprehensively identified and their significance is not well understood** in planning terms.
3. **Heritage is not adequately considered as an environmental issue**, as required by the EP&A Act at the early planning stages. Environment is too often described or imagined as natural environment only, devoid of human presence, involvement, modification or association. Thus it does not receive the attention given to areas such as threatened species or water management. Heritage is often considered at the final planning stages of a development, rather than the initial stages, making it difficult to create any real changes to decisions on development. Due to this late stage consideration, heritage assets are often compromised.
4. **Current urban design principles are being applied in a blanket way to rural or semi-rural landscapes**, without consideration of the historic environment or identifying management strategies for preserving heritage values.

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NSW Government Acts referred to in this document

(these documents can each be downloaded from <http://www.austlii.edu.au/>)

Heritage Act 1977

Environmental Planning and Assessment Act 1979

Local Government Act 1993

Strata Schemes (Freehold Development) Act 1973

Strata Schemes (Leasehold Development) Act 1986