



Australian Government
Department of Finance



Department of Finance **Heritage Strategy** 2021–2024

Delivering sustainable heritage outcomes for
the Department of Finance's Owned Estate

15 December 2021

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Glossary

EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
Finance	Department of Finance
HMP	Heritage Management Plan
ICRMF	Integrated Compliance and Risk Management Framework
PCD	Property Construction Division
PSCP	Property Services Coordinated Procurement
WoAG	Whole-of-Australian-Government

Cover photo: John Gorton Building located in Canberra. Photo by courtesy of the Department of Agriculture, Water and Environment.

Department of Finance Heritage Strategy 2021–2024

Delivering sustainable heritage outcomes for the Finance Portfolio

Foreword

The Department of Finance (Finance) manages its property portfolio (the Portfolio) in accordance with the requirements of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The EPBC Act requires Australian Government agencies to prepare and implement a Heritage Strategy, and review and reporting on progress.

Finance prepared and implemented its first heritage strategy in 2005. The diversity of heritage values and issues to be managed across the Portfolio present many opportunities and challenges. Finance adopts a proactive approach in managing the Portfolio and its EPBC Act obligations.

This revised 2021–2024 Heritage Strategy outlines the approach to further develop and enhance Finance’s reputation as a leading organisation for the management of Commonwealth Heritage values. Finance will build upon the practical measures and procedures already established, to manage heritage matters across the Portfolio to ensure compliance, consistency, and an integrated approach across our business.

Rosemary Huxtable PSM

Secretary, Department of Finance



Commonwealth Offices Building, 4 Treasury Place, East Melbourne

1. Heritage in the Finance Context

A heritage strategy is a document that provides for the integration of heritage conservation and management within an agency's overall property planning and management framework. Its purpose is to assist an agency to manage and report on the steps it has taken to protect and conserve the Commonwealth Heritage values of properties under its ownership or control.

This revised Finance Heritage Strategy outlines the approach to management of heritage values across the Finance Property Portfolio and seeks to achieve a sustainable and integrated approach to heritage management and compliance.

1.1 Legislative Context

The EPBC Act requires each Australian Government department and agency that owns or manages any property, to prepare and implement a heritage strategy, and to review and regularly report on its progress to the Minister for the Environment.

1.2 Whole of Australian Government Role

As a central agency of the Australian Government, Finance has an influential role with responsibilities that span across government, particularly with regard to expenditure, financial management, and operations. Finance is responsible for the financial framework for all Australian Government agencies and a range of Commonwealth policy management and oversight obligations. Finance's delivery is achieved by working in partnership with colleagues across the Commonwealth, supporting them to deliver on their objectives for the Australian Government.

Finance is responsible for many aspects of Australian Government property. At a Whole of Australian Government (WoAG) level, Finance provides advice on property policy and administers several key pieces of legislation. As well as managing its own Portfolio, Finance has, at times, managed major capital works projects on behalf of other Australian Government departments and agencies. These activities are managed in accordance with the EPBC Act.

1.2.1 Divestment, Acquisitions and Leasing

Finance implements government policy to sell, transfer or divest surplus properties where there are no alternative efficient Government uses for their retention. The Minister for Finance is responsible for approving property disposals in line with the Commonwealth Property Disposal Policy. In preparing properties for divestment, Finance undertakes due diligence activities to identify and address any heritage or environmental values to ensure that the divestment complies with the requirements of the EPBC Act.

Finance provides leasing and property related advice to Australian Government departments and agencies undertaking leasing negotiations and market testing, ensuring the Commonwealth's leased estate is managed in the most efficient manner. Finance has responsibility for the management and implementation of *the Lands Acquisition Act 1989*, which provides for the acquisition and divestment of properties across Government. Where property acquisitions are undertaken by Finance on behalf of the Government, Finance takes oversight of the due diligence process for identifying key issues and constraints, which include heritage matters, and ensuring compliance.

1.2.2 Property Management

Finance oversees a variety of property management services to the Australian Government. These range from developing and implementing WoAG policies and frameworks to assisting other department and agencies with their asset and property management requirements. Finance's responsibilities include:

- managing the Portfolio, including acquisition, ownership and disposal of real property (land and buildings);
- administering the Commonwealth Property Management Framework (the Framework);
- providing advice and assistance to relevant departments and agencies, including whole-of-life cost-benefit analysis under the Framework; and
- managing legislative compliance, contractual, financial, security, social, heritage, environmental and post-divestment liability risks in accordance with the Framework.

Crown Leases

Finance has identified that its obligations to properties holding Commonwealth Heritage values extend to post-divestment arrangements in the ACT where the land remains subject to a Crown Lease. As the land is still considered as National Land, Finance recognises its responsibilities in monitoring that the heritage requirements are being satisfied (unless National Land status has been revoked) and is responsible for making the Heritage Management Plan (HMP) a Legislative Instrument under section 341S of the EPBC Act.

1.3 The Finance Property Portfolio

The Finance Property Portfolio comprises 57 sites across Australia as at 1 October 2021. The size of the Portfolio changes each year, mainly through divestment and on rare occasions, acquisition activities. The Portfolio comprises a diverse range of properties including office buildings, special purpose facilities, heritage assets, vacant land and contaminated sites. The heritage values currently identified across the Portfolio are diverse and include natural heritage areas, Indigenous heritage sites and artefacts, historic buildings and landscapes. Finance manages these sites through Preventative Maintenance and Asset Management Plans and HMPs.

1.3.1 Natural Heritage

Natural heritage significance means 'the importance of ecosystems, biodiversity and geodiversity for their existence value for present or future generations, in terms of their scientific, social, aesthetic and life-support value' (Article 1.3 of the Australian Natural Heritage Charter¹). Assessing natural heritage significance is fundamental and necessary to the process of heritage conservation because it identifies the values that need to be recognised in conservation management and guides future management of the place.

1.3.2 Indigenous Cultural Heritage

According to the Commonwealth's *Engage Early Guide*, Indigenous (Aboriginal and Torres Strait Islander people) heritage is dynamic and includes tangible and intangible expressions of culture that link generations of people over time. Indigenous people express their cultural heritage and their relationships with country, people, beliefs, knowledge, traditional law, language, symbols and ways of living in the landscapes, waters, and objects - all of which arise from Indigenous spirituality.

The respect and understanding for Aboriginal and Torres Strait Islander people, histories, and cultures are key to Finance's core values. Finance continues to meet its Indigenous heritage

¹ Protecting Natural Heritage: Using the Australian Heritage Charter (2nd Edition)

protection obligations through individual site HMPs, application of the *Engage Early*² Guide and the Commonwealth Heritage Management Principles (the Principles), which states:

Indigenous people are the primary source of information on the value of their heritage and that the active participation of indigenous people in identification, assessment and management is integral to the effective protection of indigenous heritage values.

Property Highlight: Portion 838 (Jim Jim) and Portion 895 (Cooinda Road)

Cooinda and Jim Jim are two contiguous properties surrounded, but excised from, the UNESCO World Heritage listed Kakadu National Park, Northern Territory. An Aboriginal sacred site has been documented by the Northern Territory Aboriginal Areas Protection Authority and entered into the NT Register of Sacred Sites in accordance with the *Northern Territory Aboriginal Sacred Sites Act 1989*.

A Heritage Assessment, prepared in 2015, assessed the natural and Indigenous heritage values of the place as meeting the threshold for inclusion on the Commonwealth Heritage List, as the properties are component parts of the World Heritage Kakadu National Park.

The area's cultural landscape and association with a Dreaming place demonstrates the long-term physical presence of Indigenous people in this area. This association provides a strong, spiritual and living connection between the Bininj/Mungguy People and their traditional lands. The place meets the threshold for inclusion on the Commonwealth Heritage List and a HMP is currently in draft. The HMP will guide the management of Cooinda and Jim Jim, and ensure the ongoing protection of its significant natural and Indigenous heritage values.



Landscape at Cooinda / Jim Jim

1.3.3 Historic Heritage

Finance continues to strategically manage its properties with historic heritage values, with a focus on maintenance and refurbishment works of its Commonwealth Heritage listed buildings. Finance ensures heritage values are protected through divestment negotiations and has successfully mapped heritage controls into property transfers, for seamless statutory transfer from the Commonwealth Heritage List to state or territory heritage registers.

² Engage Early, A Guide to Respecting Indigenous Heritage Places and Values, Australian Heritage Commission 2002.

Property Highlight: John Gorton Building, ACT

Finance oversaw the extensive restoration work of one of Canberra's historic public service office buildings, the John Gorton Building (JGB) in the Parliamentary Triangle, ACT. An environmental report from 2013 highlighted risks from falling sandstone panels and lead capping described as 'critical', while further inspections found the stone work and lead had been showing signs of accelerated deterioration.

In order to maintain the performance of the building, Finance brought together a team of experts, including heritage architects and heritage stonemasons. The multi-million dollar capital works project was divided into seven stages due to the sheer size of the JGB, and comprised:

- removal of asbestos containing mortar, pointing, grouts and sealant to stone and granite elements;
- stone conservation works including: cleaning of the façades, full stone replacements, stone indents, redressing of stone, mortar repairs and re-pointing;
- replacement of lead flashing and other elements; and
- repairs and replacement of all roof sheeting, rainwater heads, downpipes and box gutters.

The conservation works have preserved the characteristic and aesthetic heritage values of the building for which it is Commonwealth Heritage listed, for many years to come.



From left to right: JGB; sandstone sourced for façade works; and façade conservation program in progress.

1.4 How to use this Strategy

The Strategy has been drafted to assist Finance plan, manage and report on its statutory heritage obligations in relation to its Portfolio. This Strategy is structured to directly follow EPBC Regulation 10.03E Schedule 7C, which sets out the matters to be included in a heritage strategy.

A heritage strategy is comprised of the following key components:

- general matters, including organisational structure and corporate framework, processes for consultation and conflict resolution; and process for monitoring, reviewing and implementing a heritage strategy (Section 2.0);
- identification and assessment of Commonwealth Heritage values and development of a Heritage Register (Section 3.0);
- management of identified Commonwealth Heritage values (Section 4.0); and
- training and promotion related to identified Commonwealth Heritage values (Section 5.0).

2. Roles, Responsibilities and Processes

2.1 Finance's objective for managing its heritage places (Schedule 7C Section 1(a))

Finance seeks to deliver sustainable heritage outcomes for Commonwealth property managed by Finance on behalf of current and future generations.

The objectives of the Strategy are to:

- ensure compliance with the heritage requirements of the EPBC Act;
- apply due diligence and effectively manage risk regarding heritage values of the Portfolio;
- fully integrate heritage considerations into Portfolio management;
- ensure sustainable heritage outcomes are aligned with the broader Framework and internal tools such as Preventative Maintenance and Asset Management Plans; and
- build upon Finance's reputation as a leader in managing the heritage aspects of Commonwealth property.

2.2 How the heritage strategy operates within Finance's corporate planning framework (Section 1(b))

Finance's Corporate Plan 2021–22 emphasises the 'ongoing pressure to balance short, medium and long-term fiscal and policy objectives' and the 'continued application of rigour and discipline to Finance's fiscal and policy advice to the government noting the impact of the COVID-19 pandemic and the ongoing national bushfire recovery process'.³

The Corporate Plan, the Commonwealth Property Management Framework (the Framework)⁴, the Property Services Coordinated Procurement arrangements (the Arrangements)⁵ and the Commonwealth Procurement Rules together establish a comprehensive framework for achieving value for money and ensuring the best outcome for government property decisions. This Strategy is aligned with the 2021–22 Corporate Plan. Finance's divestment approach is underpinned by the Framework. Surplus and redundant properties that do not demonstrably contribute to government service delivery outcomes, or have an alternative efficient government use, are identified and divested. Finance has undergone a period of focus on divestment which has resulted in a decrease in the size of the Portfolio by nearly half since 2014/15. Major acquisition of properties with potential Commonwealth Heritage values is unlikely to occur for the foreseeable future.

³ Department of Finance Corporate Plan 2020–2021: 4

⁴ Commonwealth of Australia (2020). Commonwealth Property Management Framework Resource Management Guide No. 500: 4.

⁵ This arrangement, as announced in the 2016–17 Budget, supports the *Public Governance, Performance and Accountability Act 2013 (PGPA Act)*, which relates to the proper use and management of public resources.

2.3 Key positions within Finance which are responsible for heritage matters (Section 1(c))

Since 2016, Finance has contracted three external Property Service Providers to deliver leasing services and facilities management (FM) services to non-corporate entities under the Arrangements to improve the efficiency of property services across the Commonwealth.

The day-to-day management of the portfolio is the responsibility of the Property Service Providers in line with the Arrangements. Responsibility for overall heritage compliance and tracking against Strategy commitments is with Finance's Property and Construction Division (PCD).

Finance's PCD, in conjunction with the external Property Service Providers, is implementing steps to proactively manage and track compliance across the Portfolio. This has included developing reporting tools to better support the Property Service Providers with their defined heritage management tasks at the individual property level.

Where necessary, and in an effort to complement heritage advice, peer expert review or advice is sought from a range of independent sources, including contamination, hazardous materials, and safety experts. These subject matter experts independently identify and assess heritage values on behalf of Finance and are guided by the key practice standards identified in this Strategy. Finance or their Property Service Providers may seek to engage subject matter experts for discrete heritage tasks to assist Finance and/or the Property Service Providers directly, as required.

2.4 Process for consultation and liaison with other government departments and agencies on heritage matters (Section 1(d))

Finance consults with the Department of Agriculture, Water and the Environment (DAWE) and other Australian Government departments and agencies to discuss and seek input and advice regarding management of heritage values within the Portfolio. This consultation and liaison is undertaken as required and focuses on compliance with the EPBC Act and Regulations.

Finance is not obliged to comply with state and territory heritage legislation or local government related instruments. However, where these do not conflict with Commonwealth legislation, Finance seeks to meet the intent of state, territory and local heritage policies, initiatives and legislation.

2.5 Process for consultation and liaison with the community on heritage matters, including, a process for consultation and liaison with Indigenous stakeholders on Indigenous heritage matters (Section 1(e))

Consultation with the community, including Indigenous stakeholders, is undertaken by Finance in relation to specific heritage matters at individual properties as required. Consultation is guided by current Commonwealth standards, namely the Commonwealth Heritage Management Principles (the Principles), the provisions of *Engage Early Guides*, and the non-statutory Australian ICOMOS Burra Charter⁶.

Finance ensures best practice during the preparation of Heritage Assessments and HMPs through consulting with Indigenous representatives and conducting on-site meetings. The process for developing HMPs involves engagement with affected communities consistent with sections 341S(3) and (6(b)) of the EPBC Act. HMPs also outline arrangements for on-going community engagement.

⁶ The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance. Australia ICOMOS, Australia.

2.6 Process for conflict resolution arising from the assessment and management of Commonwealth Heritage values (Section 1(f))

Heritage values are not always readily understood or accepted. Matters that may require resolution include determining whether a heritage value exists, meets the threshold for the Commonwealth Heritage List, conflict between heritage values, contamination remediation requirements and/or safety issues, and managing heritage values in the context of conflicting use or activity.

The identification and assessment of heritage values is independently undertaken on behalf of Finance by subject matter experts, guided by:

- the EPBC Act and Regulations; and
- industry best practice standards such as the Burra Charter, Engage Early and the Natural Heritage Charter (refer to Section 3.1 for further details on practice standards).

If a conflict arises between managing Commonwealth Heritage values and Finance WoAG obligations, the process for resolution will take into account Government key priorities, obligations under the EPBC Act and any management plans such as HMPs or environmental management plans.

Expert advice from external subject matter experts may also be sought in a conflict resolution process, and/or may take the form of a multi-disciplinary team with contamination, hazardous materials and safety experts to complement the heritage advice as required. Advice may also be sought from DAWE.

2.7 Processes for monitoring, reviewing and reporting on the implementation of the Strategy (Section 1(g))

Implementation of the Strategy is monitored at a property level by the Property Service Providers and reviewed annually. The Property Service Providers manages property-specific heritage matters and commissions any required heritage management deliverables, such as Heritage Assessments, Heritage Impact Assessments or the revision of HMPs. The Property Service Providers also tracks progress of each deliverable.

The Property Service Providers use an integrated tool called Preventative Maintenance and Asset Management Plans which establishes baseline information about the condition of those elements that represent heritage values, maintenance and all actions that could impact on the property. The Preventative Maintenance and Asset Management Plan forms the basis of the annual review, which aims to:

- ensure all Portfolio management, divestment and major project monitoring and reporting tools include heritage management tracking capabilities;
- ensure that a system of regular review, reporting and accountability is in place through a regular revision of the management plan;
- identify heritage values and potential risks through Heritage Assessments and Heritage Impact Assessments;
- revise the status of HMPs as required;
- update the Finance Heritage Register and Commonwealth Heritage List as required; and
- track referrals under the EPBC Act.

Finance will ensure that all staff with property and construction responsibilities adopt the policies outlined in this Strategy and deliver on its commitments. Finance will also ensure that robust processes and systems are in place via the Property Service Providers for relevant property and construction contractors and that they too are accountable for contributing to the successful delivery of the Strategy.

To ensure progress against this Strategy is on track, Appendix A provides a summary list of commitments to be used to guide, prioritise and monitor implementation.

3. Identifying and assessing Commonwealth Heritage Values in the Portfolio

3.1 The process for identifying and assessing the Commonwealth Heritage values of the Portfolio (Section 2(a))

Finance has made progress with identification and assessment of Commonwealth Heritage values within its Portfolio. The Commonwealth Heritage values identification and assessment process for the Portfolio includes the following steps to be consistent with EPBC Act, Section 341ZB and Regulation 10.03G:

- consider natural and cultural heritage values;
- recognise Indigenous people as the primary source of information on the significance of their heritage and their participation as necessary to identify and assess Indigenous heritage values;
- identify values against the Commonwealth Heritage criteria;
- use expert heritage advice to ensure that levels of documentary and field research are appropriate to best practice assessment and management of heritage values;
- use a comparative and thematic approach; and
- consult, as appropriate, with other government agencies, site stakeholders and the local community.

Commonwealth Heritage Management Principles

The Principles are set out in the EPBC Regulation 10.03D, Schedule 7B, and provide a guiding framework for excellence in managing Commonwealth Heritage properties. While these principles are commonly referenced in the preparation and implementation of a HMP or program, they can also be drawn upon to test whether a potential action is in accordance with their fundamental tenets. Finance adheres to these Principles by managing the Portfolio in line with the framework.

For further context the Principles are available online at:

<https://www.environment.gov.au/heritage/management/commonwealth>

Guiding Industry Standards

The Commonwealth Heritage values identification and assessment process is undertaken in accordance with EPBC Section 341ZB Regulation 10.03G, and is reflected in the Finance significance criteria that all Heritage Assessments and HMPs prepared since 2015 comply with. The Commonwealth Heritage criteria set out in Regulation 10.03G is also aligned with industry expected best practice and standards, such as:

- *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance. Australia ICOMOS, Australia (2013);*
- *Australian Natural Heritage Charter for the Conservation of Places of Natural Heritage Significance, Australian Heritage Commission 2002;*
- *Developing Management Plans (Department of the Environment, u.d);*
- *Engage Early: Guidance for proponents on best practice Indigenous engagement for environmental assessments under the EPBC Act (Department of Environment 2016);*

- Heritage criteria and Commonwealth Heritage Management Principles;
- *Identifying Commonwealth Heritage Values and Establishing a Heritage Register: A Guide for Commonwealth Agencies* (Australian Heritage Council, 2010); and
- *Working Together Managing Commonwealth Heritage Places, A guide for Commonwealth Agencies* (Commonwealth of Australia 2019).

All Heritage Assessments prepared since 2015 have been undertaken by suitably qualified heritage specialists and in accordance with Finance's Heritage Assessment format.

Finance will continue to:

- ensure it seeks relevant expert advice from qualified and appropriate sources in the assessment of the full range of heritage values for the Portfolio;
- update the Finance Heritage Register where an assessment identifies Commonwealth or other heritage values; and
- utilise the information in HMPs to inform discussions around the management of existing Commonwealth Heritage places.

3.2 Time-frames for completion of identification and assessments, the register and the report to the Minister (Section 2(b)(i)-(iii))

3.2.1 Time-frames for completion of heritage value identification and assessment program

Finance is progressively completing Heritage Assessments for the Portfolio to identify and assess the presence of Commonwealth or other heritage values. Finance has reported to the Environment Minister, outlining the status of the Heritage Identification and Assessment, as part of the Heritage Strategy Review Report 2021. This is an ongoing program. Heritage Assessments are required for two properties, which are anticipated to be completed by mid to late 2022 due to challenges in accessing these properties. Any acquired properties will be assessed within 12 months of entering the Portfolio.

Currently information on the properties listed under the Commonwealth Heritage List are publicly available through the Australian Heritage Database. An updated Heritage Register will be provided to the Minister for the Environment and published on Finance's website in December 2021.

4. Finance Heritage Register and Heritage Management Program

4.1 How Finance's Heritage Register will be maintained, updated and made accessible for public view (Section 3(a))

In accordance with the EPBC Act, the Heritage Register has been publicly available on Finance's webpage since 2013. The Register is currently being reviewed and a new Register will be uploaded in December 2021.

The Heritage Register is maintained by Finance and updated on an annual basis.

Finance also relies on the Australian Heritage Database, maintained by DAWE, to provide public information about its Commonwealth Heritage places.

4.2 Timeframe for the preparation of management plans for Commonwealth Heritage places (Section 3(b))

Finance has made steady progress with the preparation and updating of HMPs for properties with identified Commonwealth Heritage values within the Portfolio. The program for updating or preparing HMPs is subject to change as properties are divested or transferred to Finance. Review of properties is on a rolling schedule, based on when the HMP was initially endorsed. HMPs are to be reviewed and updated at least once every five years from their commencement, in accordance with the EPBC Act.

Finance has adopted a risk-based approach to prioritise the development of HMPs. The Portfolio's heritage properties are identified as high risk where the site:

- did not have an existing Conservation Management Plan or HMP;
- is / was scheduled for divestment; and
- is / was scheduled for refurbishment or major maintenance works.

The HMPs incorporate and reflect the Commonwealth Heritage criteria, and address the requirements for preparing management plans for properties with Commonwealth Heritage values, as guided by the Principles. In addition Finance has developed a format to ensure all HMPs are compliant, consistent and easy to use.

Properties requiring preparation of a HMP, or where an update is scheduled, will be completed by mid-2022.

There are a number of properties in the Portfolio that are not on the Commonwealth Heritage List. These places are being assessed against the Commonwealth Heritage criteria as part of an ongoing risk-based process. All places which are assessed as having potential Commonwealth Heritage values, but are not currently entered in the Commonwealth Heritage List, will be managed in accordance with the Principles.

Public Notification of HMPs

The EPBC Act requires public notification of draft HMPs for Commonwealth Heritage places.⁷ In order to address security requirements for certain Finance properties, Finance may prepare a 'public version' of the draft HMP to appropriately manage classified and sensitive information. Notices inviting comments from members of the public, Indigenous people with rights and interests in the place, other

⁷ In accordance with Section 10.03C, 'Publication of notice about management plan for Commonwealth Heritage places (Act s 341S)', and 16.05A of the EPBC Regulations.

ACT Government agencies with interest in the site (if any) and organisations or groups with interest in the property. Following public consultation, Finance will submit the HMP to DAWE for approval.

The “public version” notification process has been followed recently for the Mint Administration Building (ACT), and was completed prior to its divestment in 2021. HMPs that have not yet been through a public consultation process are referred to as ‘Operational HMPs’, which are used to guide day to day management and changes to the property.

4.3 Outline of the existing use of places with Commonwealth Heritage values (Section 3(c))

Finance’s heritage properties are dispersed across all states and territories, and are varied and wide-ranging across diverse environments with natural, historic and Indigenous heritage values.

Properties are characterised as:

- office buildings (administration);
- law courts;
- special purpose facilities;
- private residential housing; and
- vacant land.

4.4 Outline of current or expected development, works, disposal or other proposals that may affect Commonwealth Heritage values (Section 3(d))

4.4.1 Development and works

Major Capital Works

On occasion, Finance delivers major capital works projects on behalf of the Australian Government. Finance oversees a two-stage capital works approval process where the anticipated Whole-of-Life costs exceed \$30 million. An Initial Business Case seeks the Government’s in principle agreement to proceed to a Detailed Business Case and delivery would follow completion of the Public Works Committee processes. Heritage impacts are considered as part of the Initial Business Case and management/mitigation measures are captured in the Detailed Business Case, which enables the project approach to address heritage concerns.

Asset Maintenance

Asset maintenance works at Commonwealth Heritage properties are ongoing and include a variety of maintenance tasks (i.e., painting, carpet replacement, repair of gutters and downpipes, gardening) and urgent repairs (i.e., leaks in roofs, broken air conditioners, broken windows, damaged water or sewerage pipes, replacing cladding due to fire safety). These works are managed by the outsourced Property Service Providers and heritage values are taken into account when setting priorities for maintenance. Details on each work is available through Finance’s Planned Works Program and the individual HMP for each property.

Works are undertaken/scheduled in accordance with the HMP repairs and maintenance recommendations and then documented in the Preventative Maintenance and Asset Management Plan. Maintenance Plans per asset are set up for recurring maintenance works.

4.4.2 Disposal

A number of properties have been divested from the Portfolio since 2015. For properties with heritage values there is a process which includes notification to the Minister for the Environment. Planned divestments cannot be forecast in the Strategy due to the commercial sensitivities of these transactions.

4.5 Outline of the process to ensure that Commonwealth Heritage values are considered in planning for future development, works, divestment or other proposals (Section 3(e))

4.5.1 Planning for Development

Finance is working in accordance with the Strategy to support compliance with the EPBC Act across its heritage properties. Any changes proposed for its heritage properties are planned and implemented with due diligence against legislative requirements. Internal mechanisms, such as asset-specific Preventative Maintenance and Asset Management Plans, are used to confirm if the site holds Commonwealth Heritage values and detail the management regime that would then be triggered prior to any changes of use, divestment, development or modification.

The Finance Heritage Checklist as outlined below, provides guidance on the matters to consider when proposing a change or development at a heritage property, such as capital works, refurbishment or divestment. The process to be followed aims to ensure compliance with the requirements of the EPBC Act and Regulations to assess potential impacts and to avoid and minimise significant impacts to heritage values, identify mitigation measures or management strategies, establish ongoing heritage protection following divestment and to seek approval via EPBC Act referral for activities that may have a significant impact that cannot be avoided or minimised. The key steps involve:

- review of the property's HMP or Heritage Assessment;
- preliminary consultation with subject matter experts to seek heritage advice on appropriate pathways, as needed;
- preparation of a Heritage Impact Assessments if required;
- consultation with DAWE as appropriate;
- preparation of a submission under S341ZE or an EPBC Act referral, including supporting documents;
- Submission by tenants of Building Owner Approval documentation for all tenant related works.
- Compilation of a project commitment checklist: and
- Project close out and compliance review documentation as required.

4.5.2 Works and other proposals

Proposed works and projects at properties with Commonwealth Heritage values are guided by the HMP in the first instance. Advice from subject matter experts is obtained where required, environmental approvals (including Heritage Impact Assessments) are prepared and, where necessary, referral to the Minister for the Environment is undertaken. Future developments planned for the place, where known, are accounted for when a HMP is developed. Where there is no HMP in place, planning and developments are informed by applying the Commonwealth Heritage Management Principles, the Burra Charter, the Australian Natural Heritage Charter or the *Engage Early Guide*. Independent and relevant expert heritage advice is sought to provide heritage planning and impact assessment advice early in the development process.

4.5.3 Divestment

Finance has a divestment program for the disposal of properties that are surplus to Commonwealth requirements. Some of these properties may have Commonwealth Heritage significance. Finance acknowledges its obligations to plan for the ongoing protection of heritage properties when it is transferred from Finance ownership and works in accordance with the requirements of Section 341ZE of the EPBC Act, such as notification to the Minister, EPBC Act referral, development of specific sale clauses and HMPs.

4.6 A plan and budget for the maintenance and long-term conservation of Commonwealth Heritage values (Section 3(f))

Where a property has Commonwealth Heritage values, Finance's maintenance planning addresses any conservation objectives of the works that require funding and planning over and above standard operational needs. Maintenance is guided by the property-specific HMP. Funding for maintenance is allocated through the Finance annual portfolio budget process on a risk management and compliance basis.

4.7 Outline of the process by which the success in conserving Commonwealth Heritage values will be monitored and reviewed (Section 3(g))

The mechanisms in place for Finance to monitor and review the success of conservation of Commonwealth Heritage values are as follows:

- identification and assessment of heritage values across the current Portfolio,
- five (5) yearly reviews of HMPs,
- annual review of the Heritage Register and
- Strategy commitments and performance tracking will be undertaken as part of an annual review of heritage matters by PCD.

Condition Reporting and Monitoring on Heritage Values

Condition reporting, review, and monitoring ensures continuous improvement and best practice heritage management of the Portfolio. A five yearly report is required to be compiled by the Minister for the Environment pursuant to EPBC Act S341ZH. This report reviews the properties included on the Commonwealth Heritage List. The Minister for Environment may seek key inputs to this report from Finance. A request for input was last made by the Minister in 2020. Heritage compliance for the Portfolio is recorded and monitored in the Preventative Maintenance and Asset Management Plan. The technical requirements associated with the Portfolio are reviewed on an annual basis, with works programmed to ensure compliance obligations are met. The Preventative Maintenance and Asset Management Plan allows Finance to record and monitor property condition and any works implications for identified Commonwealth Heritage values. This process will continue to be implemented to ensure robust data is recorded and updated for heritage properties in the Portfolio, and will be utilised to update the Finance Heritage Register as it becomes available.

5. Heritage Training and Promotion

5.1 A program for the training of Finance staff (and contractors) about Commonwealth Heritage obligations and best practice heritage management (Section 4(a))

Finance is responsible for ensuring that all new Finance and Property Service Providers staff involved in portfolio management are made aware of Finance's Commonwealth Heritage obligations and best practice heritage management.

New heritage induction training material will be developed and revised annually for refresher trainings, which will be delivered to key Finance and Property Service Providers staff either virtually or face to face, as appropriate.

5.2 A program for promoting community awareness of Commonwealth Heritage values, as appropriate (Section 4(b))

5.2.1 Heritage Interpretation Overview

Opportunities for interpretation at heritage properties within the Finance portfolio are subject to property use, tenant and security requirements. Finance's HMP format requirements include guidance on interpretation options that are customised to each site. Where information about a site's heritage values can be interpreted within these parameters Finance has provided exterior interpretive signage. Finance will investigate opportunities for further HMP interpretation recommendations at other properties with Commonwealth Heritage values.

From a wider portfolio perspective, the online Heritage Register provides the public with detailed information about the Commonwealth Heritage values currently identified at Finance properties. The Register will be regularly updated ensuring that current heritage value information for the portfolio is publicly accessible.

5.2.2 Communication Overview

Finance will consult with DAWE, and other Australian Government agencies as appropriate, to discuss and seek input and advice regarding the management of heritage values at Finance properties. The process of consultation and liaison is undertaken on an as-needs basis, focussed on compliance with the requirements of the EPBC Act and Regulations.

Consultation with the community, including Indigenous stakeholders, is undertaken in relation to specific heritage issues at individual properties as needed. Finance ensures best practice during the preparation of its Heritage Assessments and HMPs through consulting with Traditional Owner representatives, including meetings and site walkovers. Consultation with the community will also occur under the new Finance procedures for the public notification of HMPs.

Appendix A:

Commitments arising from strategy



Commitment No.	EPBC Reg 10.03E. Schedule 7C Reference	Commitment detail	Timeframe	Responsible
1	<i>Time-frames for completion of identification and assessments, the register and the report to the Minister (Section 2(b)(i)-(iii))</i>	The assessment of Commonwealth Heritage values of the current portfolio will be completed by mid to late 2022.	Mid to late 2022	Property Service Providers
2		The identification and assessment of Commonwealth Heritage values of the current Portfolio will be undertaken in accordance with EPBC Act Section 341ZB Regulation 10.03G, the Principles, and industry expected best practice.		
3	<i>The process for identifying and assessing the Commonwealth Heritage values of the Finance portfolio (Section 2(a))</i>	Heritage Assessments will be undertaken in accordance with best standard heritage practice and by a suitable qualified heritage specialist.	Ongoing	Property Service Providers
4	<i>Timeframe for the preparation of management plans for Commonwealth Heritage places (Section 3(b))</i>	Finance will ensure that all HMPs due for updating are commenced, and that the few remaining properties requiring preparation of a HMP will be completed by mid to late 2022.	Mid to late 2022	Property Service Providers
5	<i>Process for conflict resolution arising from the assessment and management of Commonwealth Heritage values (Section 1(f))</i>	Where required, Finance will seek expert advice from external heritage subject matter experts or other industry specialists: DAWE or the Australian Heritage Council to assist with resolving conflicts over heritage values.	Ongoing	PCD

The day-to-day management of the portfolio is the responsibility of the Property Service Providers in line with the Arrangements, and responsibility for overall heritage compliance and tracking against Strategy commitments is with PCD. Revise Procedural Tools, as required, to align to a clearly-defined Property Service Providers and PCD heritage management responsibility structure, as follows:

PCD

- Undertake annual review of Heritage Strategy commitments and performance tracking, including review of Preventative Maintenance and Asset Management Plans

Property Service Providers

Management Team

- Annual Preventative Maintenance and Asset Management Plan to include HMP as an Appendix
- Annual Preventative Maintenance and Asset Management Plan to specifically identify 'catch-up maintenance' identified in the HMP
- Annual Preventative Maintenance and Asset Management Plan to specifically identify annual maintenance requirements identified in the HMP

FM Team

- FM to review HMP at commencement of all works on site
- FM to provide copy of HMP to tenants
- Tenants to submit a response to HMP requirements in each BOA and evidence engagement with Heritage Consultant where necessary
- FM to undertake all catch-up maintenance as detailed in the site HMPs

Property Service Providers Project Management Team:

- PM Team to be issued a copy of the HMP prior to conducting any works on site;
- PM Team to include Heritage Status into PCG Agenda's;

PCD Lead
Property Service Providers (engagement of subject matter experts, as required)

Within 6 months of Strategy endorsement

		<ul style="list-style-type: none"> ■ PM to consult with Heritage Consultant as required to ensure compliance with the HMP; ■ PM to include Heritage Commentary in Project Close-out Report as required. 		
7	<i>Outline of the process by which the success in conserving Commonwealth Heritage values will be monitored and reviewed (Section 3(g))</i>	Finance will provide information into the five yearly report on properties included in the Commonwealth Heritage List, required for submission to the Minister for Environment under EPBC Act S341ZH, upon request.	As required	Property Service Providers /PCD
8		The Finance Heritage Register will be updated as part of the annual review. Updates are to include changes to property use and new information as a result of Heritage Assessments, Heritage Impact Assessments and/or HMPs.	On-going	PCD
10	<i>How the Finance Heritage Register will be maintained, updated and made accessible to the public (Section 3(a))</i>	Finance will ensure that the revised Heritage Register is made publicly available through an online platform.	2022	PCD
11		New entries to the Finance Heritage Register will be prepared within 12 months of acceptance of a final Heritage Assessment.	On-going	PCD
12		Finance will nominate properties in its Portfolio assessed as having Commonwealth Heritage values to the Australian Heritage Council for possible inclusion on the Commonwealth Heritage List, as Heritage Assessments are finalised and accepted by Finance.	On-going	PCD
13	<i>A program for the training of Finance staff (and contractors) about Commonwealth Heritage obligations and best practice heritage management (Section 4(a))</i>	Finance will ensure that regular heritage training and awareness (induction and refresher) for key personnel and Property Service Providers is provided on a regular basis, and a focus on compliance assurance and current industry best practise standards is maintained.	On-going	PCD Lead Property Service Providers
14	<i>A program for promoting community awareness of Commonwealth Heritage values, as appropriate (Section 4(b))</i>	Finance will investigate opportunities to implement current HMP interpretation recommendations at Commonwealth Heritage List listed properties.	On-going, as part of annual review	PCD
15	EBPC S.341ZA(5)	Finance will carry out a Strategy review at least once in a 3-year period after this Strategy is accepted by the Minister of the Environment.	By 2024	PCD

Appendix B: EPBC ACT 'Quick Guide'



WORKING TOGETHER MANAGING COMMONWEALTH HERITAGE PLACES 2019

EPBC Act Quick Guide for Commonwealth Agencies: Heritage Strategies	<u>Section 341ZA(1A)</u> Agency must consult the Australian Heritage Council	EPBC Regulations 2000 <u>Regulation 10.03D SCH. 7B</u> Commonwealth Heritage management principles
<u>Section 341ZA</u> Commonwealth agency obligations to prepare a written Heritage Strategy	<u>Section 341ZA(3)(d)</u> A Heritage Strategy must be consistent with the Commonwealth Heritage Management principles	<u>Regulation 10.03E SCH. 7C</u> Content requirements for a Heritage Strategy
<u>Section 341ZA(1)(a)</u> Commonwealth agency must prepare a written Heritage Strategy	<u>Section 341ZA(5)</u> Agency must review Heritage Strategy every three years	<u>Regulation 10.03F</u> Report about review of a Heritage Strategy
<u>Section 341ZA(1)(b)</u> Commonwealth agency must give a copy of the Strategy to the Minister	<u>Section 341ZB</u> Heritage assessments and registers	<u>Regulation 10.03G</u> Heritage assessments and registers
	<u>Section 341ZE</u> Protecting Commonwealth Heritage values of places sold or leased	

Appendix C:

List of Finance-managed properties with Commonwealth Heritage values



Table 1. Finance Owned Estate properties with Commonwealth Heritage values.

Property Name	Property Address	Commonwealth Heritage List Listing
Snapper Island	Sydney Harbour, NSW	'Snapper Island, Drummoyne, NSW, Australia', Place ID 105477
Sydney Customs Depot	Lower Ben Boyd Road, Neutral Bay, NSW	'Customs Marine Centre, Ben Boyd Rd, Neutral Bay, NSW, Australia', Place ID 105249
ANZAC Rifle Range (Malabar)	Franklin Street, Malabar, NSW	Commonwealth Heritage Values identified, not yet nominated for listing
Commonwealth Offices	4 Treasury Place, Melbourne, VIC	'Commonwealth Offices Building, 4 Treasury Pl, East Melbourne, VIC, Australia', Place ID 105453
Edward Braddon Commonwealth Law Court	Davey Street, Hobart, TAS	'Edward Braddon Commonwealth Law Courts, 39-41 Davey St, Hobart, TAS, Australia', Place ID 106152
Residence	13 McMinn Street, Alice Springs, NT	'Arid A Type Residence, 13 McMinn St, Alice Springs, NT, Australia', Place ID 105423
Harry Gibbs Building Commonwealth Law Courts	119 North Quay, Brisbane, QLD	Commonwealth Heritage Values identified, not yet nominated for listing
John Gorton Building	King Edward Terrace, Parkes ACT	'John Gorton Building, Parkes Pl, Parkes, ACT, Australia', Place ID 105472
Russell Blocks (HMP managed by Department of Defence) within Russell Precinct Heritage Area	Block 4 Section 80 Block 1 Section 85 Block 2 Section 80 Block 3 Section 80 Block 3 Section 84, Russell, ACT	'Russell Precinct Heritage Area, Sir Thomas Blamey Sq, Russell, ACT, Australia', Place ID 105621
Portion 838 (Jim Jim) and Portion 295 (Cooinda Road)	As listed, NT	Commonwealth Heritage Values identified, not yet nominated for listing
ACT Border Properties	Lot 23, Urayarra, ACT/NSW Portions 223 Portions 224, Goorooyaroo, ACT/NSW	Commonwealth Heritage Values identified, not yet nominated for listing

Table 2. National Land interests that are on the Commonwealth Heritage List.

Property Name	Property Address	Commonwealth Heritage List Listing
Royal Australian Mint (Administration and former Process Building)	60-66 Denison Street, Deakin, ACT	'The Royal Australian Mint, Denison St, Deakin, ACT, Australia', Place ID 106191
Westridge House and Ground	Banks St, Yarralumla, ACT	'Westridge House & Grounds, Banks St, Yarralumla, ACT, Australia', Place ID 105427
West Block	Queen Victoria Terrace, corner Commonwealth Avenue, ACT	'West Block and the Dugout, Queen Victoria Tce, Parkes, ACT, Australia', Place ID 105428
East Block Government Offices	Corner of Kings Avenue and Queen Victoria Tce, ACT	'East Block Government Offices, Queen Victoria Tce, Parkes, ACT, Australia', Place ID 105349
Anzac Park East, West and Constitution Avenue Development Site	Parkes, ACT	'Parliament House Vista Extension – Portal Buildings, Anzac Pde, Parkes, ACT, Australia', Place ID 105474
Googong Foreshores	London Bridge Road, Burra, NSW	'Googong Foreshores Cultural and Geodiversity Heritage Areas, London Bridge Rd, Burra, NSW, Australia', Place ID 106072
Casey House	Block 1 Section 44, Yarralumla, ACT	'Casey House and Garden, 4 Rhodes Pl, Yarralumla, ACT, Australia', Place ID 105629