

Monday, 30 March 2026

Department of Environment, Tourism, Science and Innovation  
GPO Box 2454, Brisbane, Queensland, Australia, 4001  
Via email: [HeritageFeedback@detsi.qld.gov.au](mailto:HeritageFeedback@detsi.qld.gov.au)

## **DEVELOPING A NEW QUEENSLAND HERITAGE STRATEGY - SUBMISSION**

Date	27 March 2026
Prepared by	Australian Institute of Architects, Queensland Chapter

### **Introduction**

The Australian Institute of Architects Queensland Chapter welcomes the opportunity to provide feedback on the development of a new Queensland Heritage Strategy and the accompanying review of the Queensland Heritage Act 1992.

The Institute supports the Government's stated ambition to deliver a modern, fit-for-purpose heritage framework that improves stewardship, strengthens public understanding, and enables heritage and development to complement one another rather than be treated as competing objectives. The discussion paper rightly recognises that heritage contributes to culture, identity, tourism, sustainability, urban amenity and economic life, and that adaptive reuse and innovation are essential to ensuring heritage remains relevant into the future.

We support reform. However, in the Institute's view, the success of this reform process will depend on whether it delivers a framework that is not only more efficient, but also more expert, more consistent, and more effective in conserving Queensland's cultural heritage significance in practice.

Queensland's heritage legislation has remained largely unchanged for over 30 years, and the case for modernisation is well made. At the same time, heritage protection should not be weakened under the banner of streamlining. Reform should strengthen significance-led decision-making, provide better tools for adaptive reuse, improve stewardship by owners and governments, and ensure that specialist heritage expertise is central to assessment and governance. The Institute's Heritage Committee has undertaken a detailed review of the discussion paper's legislative proposals and supports targeted amendments that improve the Act while retaining its essential structure and purpose.

### **1. Making heritage accessible**

Heritage is important because it carries the stories, memory and identity of Queensland's communities. It is not limited to landmark buildings or monuments. Heritage also includes the everyday places, landscapes, infrastructure, public buildings, post-war places, migrant stories, and Aboriginal and Torres Strait Islander histories that together shape Queensland's sense of place. The discussion paper is right to emphasise that heritage must better reflect the diversity of the State and resonate more deeply with diverse communities.

The Institute supports a broader and more inclusive approach to identifying, interpreting and presenting heritage. This should include:

- stronger recognition of under-represented regional, cultural and typological heritage
- renewed thematic studies and gap analyses to identify missing stories and places
- better interpretation of heritage places so communities can understand not only what is protected, but why it matters
- stronger integration of Aboriginal and Torres Strait Islander knowledge and lived histories, with appropriate leadership and cultural authority.

Heritage becomes more accessible when it is legible, well interpreted and connected to community life. The new strategy should therefore place a strong emphasis on storytelling, public education, digital interpretation and place-based engagement.

## **2. Improving stewardship**

Improving stewardship should be at the centre of the new strategy. The Heritage Committee strongly supports modernising the Act to create a more effective stewardship and enforcement framework, including stronger maintenance obligations, improved compliance tools and earlier intervention where places are at risk. The current regime is too limited and often relies on other legislation to address deterioration or neglect.

The Institute supports legislative reform that:

- introduces a general heritage duty of care
- expands repair and maintenance powers beyond minor works
- enables meaningful intervention where places are deteriorating through neglect, structural failure or lack of maintenance
- provides contemporary show cause, rectification and cost-recovery mechanisms
- supports both State and local government to act early and proportionately.

At the same time, stewardship must not be understood only as enforcement. Private owners are central to the future of heritage in Queensland. Better stewardship will require education, technical guidance, and practical support for owners, including access to grants and best-practice information. The Heritage Committee has usefully recommended reintroducing owner-focused guidance material and information packs for new owners of State heritage places. That is a practical and worthwhile suggestion that should be taken up in the new strategy.

The Institute also supports temporary protection powers for potential State and local heritage places, with those powers vested in the chief executive rather than the Minister. Temporary protection is a necessary safeguard where places of likely significance face imminent risk, and its operation should be independent, timely and based on professional evidence. The proposed timeframes should also be long enough to allow a sound and properly substantiated assessment.

## **3. Celebrating heritage**

The new strategy should recognise that heritage protection and heritage celebration are mutually reinforcing. The discussion paper is right to note the contribution heritage makes to wellbeing, sustainability, tourism and the economy. Celebrating heritage helps build community understanding and support, which in turn strengthens long-term stewardship.

Queensland has an opportunity to better celebrate heritage through:

- stronger heritage tourism initiatives, particularly in regional Queensland
- support for local events, heritage trails, open house programs and digital storytelling

- activation of public heritage places as community hubs, cultural venues, learning spaces and civic assets
- showcasing best-practice adaptive reuse and conservation projects across the State.

The Heritage Committee has also pointed to a substantial body of earlier Department-funded research that should inform this work, including thematic and context studies and heritage trail material. The Institute supports that recommendation. Existing research should be reviewed and used as part of a coherent strategy to fill gaps in listings, improve interpretation and support tourism and public education outcomes.

#### **4. Optimising the benefits of heritage**

The Institute strongly supports the discussion paper's recognition that heritage and development need not be framed as opposites. Good planning and urban design can support well-designed solutions that respect cultural heritage significance while delivering housing, community use and economic activity. Adaptive reuse is one of the most powerful ways to secure both conservation and ongoing public value.

For that reason, the new strategy should make adaptive reuse a central pillar of heritage policy. In our view, this means:

- embedding adaptive reuse as a preferred conservation pathway where significance can be retained
- supporting design excellence in heritage contexts rather than encouraging lowest-common-denominator outcomes
- better aligning heritage and planning systems so that heritage issues are identified early and resolved clearly
- ensuring heritage places can contribute to housing, employment, tourism and civic life without compromising their significance.

However, adaptive reuse must remain significance-led. Heritage should not become a symbolic overlay that permits erosion of fabric, setting or meaning in the name of activation. The Institute supports stronger statutory guidance on how cultural heritage significance is interpreted, including clearer recognition of contributory elements, context and the full register entry rather than narrow reliance on isolated wording. The Heritage Committee's detailed comments on the Objects of the Act, register updating, and interpretive provisions are directly relevant here.

A critical issue in this area is planning integration. The Institute supports the Government's desire for better alignment between heritage and planning, but this must be done by improving specialist assessment rather than diluting it. The Heritage Committee has raised a significant concern that development assessment on State heritage places currently sits with SARA, while the specialist expertise sits in DETSI's heritage branch. The Institute supports restoring specialist heritage assessment responsibility where that expertise exists. It also supports strengthening State Code 14 for major proposals through detailed fabric assessment and heritage impact assessment prepared by suitably qualified practitioners.

#### **5. Enhancing governance**

The Institute supports governance reform that makes the heritage system more expert, transparent and effective. A new Queensland Heritage Strategy should, in our view, cover a 10-year period, with a formal mid-term review at five years. This would provide sufficient stability for implementation while allowing government to respond to changing conditions and lessons from

practice. The discussion paper notes that the previous strategy was released 10 years ago and seeks views on both timeframe and guiding principles.

The strategy should be guided by the following principles:

- cultural heritage significance should remain the central basis for decision-making
- heritage is dynamic, and adaptive reuse can be an essential part of long-term conservation
- everyone has a role in stewardship, but expert assessment remains essential
- community voices matter and should help inform understanding of significance
- heritage governance should be transparent, accountable and evidence-based
- regional Queensland and under-represented heritage must be more fully recognised
- public policy should support conservation through education, incentives and exemplary public sector stewardship.

In relation to the Queensland Heritage Council, the Institute supports the intent of a skills-based membership model, but any reduction in membership must be approached carefully. A smaller Council may improve efficiency, but it also risks narrowing expertise and intensifying absenteeism and conflict-of-interest pressures. The Heritage Committee therefore supports retaining a strong skills base, preserving key stakeholder representation, and explicitly including a member with lived experience as an owner, occupier or custodian of a heritage place. It also supports conflict-of-interest provisions that are transparent and robust, but not so rigid that they exclude the very expertise the system requires.

#### **Additional matters**

The Institute strongly supports retaining open standing for nominations to the Queensland Heritage Register. Open nomination is a fundamental safeguard and should not be replaced by a purely strategic or government-led process. Strategic thematic studies and gap analyses are valuable and should be added, but they must complement, not displace, public nominations.

The Institute also supports reform that enables the updating of heritage register entries without owner consent where necessary to ensure accuracy, completeness and currency, subject to a fair and transparent objection process. Queensland's current position is more restrictive than most other jurisdictions in this respect, and clearer, better-maintained entries are essential for sound decision-making.

At the local level, the strategy should do more to support and require local governments to identify, list and manage places of local heritage significance. The Heritage Committee is right to note that many councils either do not maintain effective local heritage registers or lack adequate planning overlays and policy settings. The Institute supports retaining Part 11 of the Act, strengthening compliance expectations for local government, and revising the 2020 guideline so that local assessment criteria align more clearly with the established State criteria.

#### **Conclusion**

The Australian Institute of Architects Queensland Chapter supports the development of a new Queensland Heritage Strategy and the proposed review of the Queensland Heritage Act 1992.

We support reform that is modern, practical and forward-looking. We also emphasise that the purpose of reform should not be to make heritage easier to bypass, but to make heritage protection clearer, better understood, more consistently applied and more effectively integrated with planning, design and community life.

Done well, this strategy can help Queensland move beyond the false choice between heritage and growth. It can create a framework in which heritage is valued as living cultural infrastructure: something that contributes to identity, sustainability, tourism, civic life and economic resilience, while still being protected with rigour and expertise.

The Institute would welcome continued engagement with the Queensland Government as the strategy and legislative reforms progress. We also commend the detailed submission prepared by the Australian Institute of Architects Queensland Chapter Heritage Committee and its Chair Luke Pendergast contained in Appendix A, which should be read alongside this submission.

Sincerely,



Peter Gardiner  
Queensland Chapter President  
Australian Institute of Architects



Kim Richards  
Executive Leader, Queensland  
Australian Institute of Architects

Attachment: Appendix A: AIA Queensland Chapter Heritage Committee