## **Response to City of Yarra Draft Heritage Strategy 2019-2030**

This response follows my first sight of the draft plan, immediately following the meeting of the Heritage Advisory Committee on 10<sup>th</sup> October 2019. I have kept this very short as I understand that speed is of the essence.

I note that the Draft Heritage Strategy is comprehensive in many respects. However it is seriously deficient in its approach to the management of the archaeological heritage of the City. At no point does the document acknowledge that the near total focus on the built form (and some acknowledgement of the need to develop a more comprehensive Aboriginal history of the City) poses a significant challenge to the management of the archaeological heritage of the City. In 2019 it should not be necessary that a focus on historical heritage requires more than a focus on built forms or inscribed landscapes.

The absence of an explicit and clearly-thought-through strategy to manage the archaeological cultural heritage of the City means that our capacity to effectively respond to ANY of the four Strategic Directions noted on P. 12, is severely hampered. The consequence of this is that threats to archaeological heritage cannot yet be identified, let alone mitigated. I note that Aboriginal Heritage is seen as a priority area ONLY for *Promoting and Celebrating our heritage*.

Collectively the absence of a strategic approach to the identification and management of the archaeological heritage of the City of Yarra represents a fundamental shortcoming in the Strategy that requires an urgent response from Council.

At the very least the Council needs to urgently review its processes related to the commissioning of heritage advice, so that it can move beyond a focus on the historical and architectural. I note that there are several major heritage consultancies that can provide such advice, especially when linked to the in-house expertise to be found in Heritage Victoria.

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