

29 April 2014

Mr Tom Perrigo  
Chief Executive Officer  
National Trust of Australia (WA)  
PO Box 1162  
WEST PERTH WA 6872

Dear Mr Perrigo

### Wedge and Grey Shack Settlements—Proposed Management Zones

I refer to our commission from the National Trust of Australia (WA) (NT WA) to undertake an initial review and provide comment on documents relating to the Wedge and Grey management zones proposed by the Department of Parks and Wildlife, Government of Western Australia (DPaW).<sup>1</sup>

#### *Background*

In April 2012 Godden Mackay Logan, Sydney (GML), in collaboration with Context, Melbourne, prepared the *Wedge and Grey Shack Settlements Cultural Heritage Assessment* for the NT WA. I was the author of that report in collaboration with Ms Chris Johnston, Director, Context. The report concluded that the shack settlements of Wedge and Grey met a number of the ‘nature’ and ‘degree’ of significance criteria to warrant entry on the WA State Heritage Register.

In May 2012 the National Trust of Australia (WA) forwarded the GML report to the WA State Heritage Office with a request that the Heritage Council formally enter the two shack settlements onto the State Heritage Register. On 27 November 2012 the WA State Heritage Office wrote back to NT WA noting that:

*It was determined that the place is likely to have heritage value at the State level and, as such, it has been added to the Council’s assessment program.*

#### *Appropriate conservation planning processes*

Against this background it is very disappointing to hear that not only has the assessment of the nomination not proceeded, but that the State Heritage Office has agreed to not address a formal assessment or listing until such time as the current management planning has been completed and zones determined; effectively leaving it to assess whatever is left of the settlements after other constraints, other than European heritage values, are applied. We understand that a review occurred of Aboriginal heritage values and sites at Wedge (Zone D) to better manage these constraints, but no action is evident to address the European heritage values.

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<sup>1</sup> The documents reviewed in preparing this letter include the *Wedge and Grey Shack Settlements Cultural Heritage Assessment* prepared by Godden Mackay Logan Heritage Consultants in collaboration with Context for the National Trust of Australia (WA) April 2012, a letter from the State Heritage Office to NT (WA) dated 27 November 2012; a PowerPoint presentation by DPaW to Wedge and Grey Stakeholders 26 February 2014; maps dated 26 February 2014 showing existing situation and proposed zones prepared by DPaW (1 (separate Wedge and Grey Base Maps), 9, 15, 16); tables providing details of proposed management zones/rationale/prescriptions dated 26 February 2014; DPaW Wedge and Grey Working Group Meeting Notes 25 March 2014.

The former Minister for the Environment Mr Bill Marmion participated in the launch of the GML report by the NT WA in October 2012 where he stated that the report would play a key role in planning at Wedge and Grey.<sup>2</sup> There is no evidence in these documents that this has occurred. The NT WA is a key stakeholder in this issue given its assessment was undertaken in close association with the shack communities, so it is disappointing that NT WA have not been invited by DPaW to participate in this current planning process.

As discussed further below, the establishment of significance and then the identification of various constraints arising from significance and other factors (such as those arising from other legislation) are essential prerequisites for developing appropriate conservation management policy. The process occurring here does not conform in any way to accepted national conservation planning practice and this lack of due process could potentially form part of a challenge to any of its outcomes.

#### *Impacts on Heritage Significance*

The assessment in the GML 2012 report concluded that the shack settlements of Wedge and Grey met the State Register 'nature' of significance criteria for aesthetic, historic, and social values and also met both the rarity and representative degree of significance criteria. The report noted that:

*these values are evident in the form and layout of the settlements, in the built forms and infrastructure systems, in the community space and structures, in the landscape setting, in people's relationship with place, and its traditions, cultures and social networks. Further these settlements have a particular and distinctive aesthetic value; while the organic and idiosyncratic aspects of the shack aesthetic values may challenge a usual understanding of aesthetic, this aesthetic strongly reflects the history and location of the shacks and most importantly is a community aesthetic value closely entwined with its social values.*

In short, there is a very strong interrelationship between all the identified heritage values; between the settlement history and the form of the landscape, between individual shacks and their landscape places and between social and aesthetic values (both the broader landscape and individual shack designs). These proposed management zonings will sever many of these important relationships and have a major adverse impact on heritage values.

The cultural landscape relationship between shacks and place, in particular the beach frontages and dunes is referenced throughout the GML significance assessment report. The first shacks were built near the waterfront and used dunes for protection. Figures 5.2 and 5.16 in the GML report illustrate the early periods of development. It is these early areas of shack development that are at most risk in these current plans. For example, we have been advised that there are at least two timber framed wooden floor fisher shacks from the 1960s at Wedge in the proposed Zone A that have withstood the test of cyclic erosion patterns. The removal of these and other early shacks would have a major impact on the integrity of the settlements as a whole.

The shacks have aesthetic values as a group resulting from their scale and landscape setting and also have highly individualised design qualities. The 'normalisation' of the shack settlements resulting from significant BCA upgrading works without reference to shack aesthetic values, both collectively and individually, will result in a total loss of their rarity value – they are unique in WA and possibly in Australia. The shacks in Royal National Park south of Sydney provide a good precedent for how this upgrading can be achieved with Conditions Standards contained in formal licence agreements between the NSW National Parks and Wildlife Service specifically obviating

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<sup>2</sup> The West Australian, October 24 2012 p7.

the need for BCA compliance.<sup>3</sup> A well developed conservation management plan, developed with WA State Heritage Office input, could provide a rationalisation between essential upgrading requirements and heritage values.

The GML report identified strong family and personal associations between particular places and the shacks. The removal or relocation of the shacks will have a major adverse impact on individual and family associations with particular shacks and their particular place in the landscape. The relocations may also lead to the disruption of the shack communities more broadly.

There seems to be a misunderstanding implied in the zonings that the actual shack or its actual location is not critical to the cultural values of place; rather the continued amenity of having a shack would be sufficient to retain values. The proposed shack zonings may retain some amenity value but would significantly impact social values. This misunderstanding of social heritage value was reflected in the 2010 Parliamentary Inquiry Report that suggested that only providing access to the Wedge and Grey areas would be sufficient to retain heritage values where in fact it is the shacks, their aesthetic values and their landscape settings that are a critical aspect of their social significance.

There appears to be no basis in significance terms for the shack zoning areas retained. Such an oversight will mean that the assessed actual heritage values and their physical attributes will not be a tool available to assist management, as is normally the case. Indeed, the current shack zoning that does not have specific heritage objectives may actually militate against good outcomes for heritage values.

#### *Opportunities for appropriate policy development*

The Conclusion and Recommendations in the GML 2012 report stated that the Australia ICOMOS Burra Charter provides the nationally accepted framework within which management policies are developed with reference to identified cultural heritage values, to provide for a sustainable and equitable future for heritage places. The letter that accompanied the NT WA nomination noted that:

*...the National Trust of Australia (WA) does not support the unplanned and uncontrolled development of human settlements on public land. Nevertheless it is unacceptable that important planning decisions are being made with little regard for the cultural heritage values impacted on by those decisions. There is no question any development of these areas must ensure the cultural heritage values are conserved and interpreted.*

The GML significance assessment brief was to assess whether the shacks as a whole meet criteria for State listing and was not required to go further and identify constraints and opportunities arising from significance that could assist issues of relocation and or upgrades. This would normally be done in a Conservation Management Plan, or similar document, and is a missed opportunity here.

Communication of the shack settlement heritage values with the broader community is a significant opportunity for policy development. In this regard, the development of integrated 'public facilities' within the broader shack settlement areas would result in a richer site experience for visitors rather than the current zone concept of segregated 'private' and 'public' areas.

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<sup>3</sup> Conditions Standards for Coastal Cabins in Royal National Park in the areas of Bulgo, Burning Palms, South Era and Little Garie, March 2003, prepared by Residential Technologies & WHP Architects for NPWS.

### *Conclusions and recommendations*

Our initial review of the current DPaW management zoning documents for the Wedge and Grey Shack Settlements is that they are wholly inappropriate and inadequate given their lack of meaningful consideration of European cultural heritage values. The zoning process may address the natural and Aboriginal cultural heritage values and threats to these values but does not address in any way the European cultural heritage values contained in these special landscapes.

The process of not completing the WA State Heritage Register assessment until such time as the management zoning is developed is fundamentally flawed in itself but also misses a huge opportunity to develop a management plan that meaningfully addresses both its natural and cultural values in this landscape.

No one is saying that all significant elements of the place must and can be retained without impacts but an honest consideration of all values together at the same time will lead to a stronger and more sustainable management outcome.

It is recommended that the National Trust of Australia (WA) write to DPaW requesting that:

- DPaW suspend the current management zoning project to allow the Heritage Council of WA to complete its assessment of the Wedge and Grey Shack Settlements;
- Following this assessment that, in association with the Stage Heritage Office, DPaW prepare a thorough heritage constraints and opportunities and conservation policy document for input into master planning for these two sites, including upgrading requirements that recognise heritage values; and
- the National Trust of Australia (WA) be consulted and invited to participate and comment on this process and the development of conservation policy with other stakeholders, including the Wedge and Grey shack communities.

Yours sincerely



Geoff Ashley  
**Director**