
B Survey of local governments

B.1 The survey

This survey was conducted by the Commission to better understand local government involvement in historic heritage conservation. Initially, a draft survey questionnaire was developed and distributed to State government heritage agencies and the Local Government Associations of Queensland and South Australia for comment. The Australian Bureau of Statistics also provided useful suggestions on how to make the survey more user-friendly. The survey questionnaire was then sent to nine local councils for testing. Based on their feedback, further changes were made before the questionnaire was sent to all councils in September 2005. Councils were informed that all responses would be treated confidentially and that the information provided would not be reported in a way which could identify individual local government areas.

The response rate varied by State (from 60 per cent in Western Australia to 93 per cent in South Australia) but overall, almost three-quarters of councils responded (table B.1). The Commission would like to express its appreciation to all those who participated in the survey. The responses revealed a number of insights into the conservation activities of local governments (who are responsible for conservation policy for most historic heritage places). In particular, it revealed a diverse range of approaches by local governments to historic heritage conservation.

B.2 Historic heritage places in local government areas

Of those councils which responded, 75 per cent have a statutory list. In aggregate, these councils list over 76 000 individual places and 1770 heritage areas. There were marked differences between the proportions of councils with a list in each State (table B.2). In New South Wales and Victoria, over 90 per cent of responding councils had a list. In Queensland, less than half those councils responding had a list.

Table B.1 Local government historic heritage survey, response rate by State

| <i>State</i> | <i>Total sent</i> | <i>Total response</i> | <i>Response rate</i> |
|-------------------|-------------------|-----------------------|----------------------|
| | No. | No. | % |
| New South Wales | 152 | 130 | 86 |
| Victoria | 79 | 64 | 81 |
| Queensland | 157 | 98 | 62 |
| Western Australia | 144 | 86 | 60 |
| South Australia | 69 | 64 | 93 |
| Tasmania | 29 | 22 | 76 |
| Totals | 630 | 464 | 74 |

Source: Productivity Commission Survey.

Across all States, some 10 per cent, on average, of locally significant historic heritage places were council owned. However, some individual local government areas diverged significantly from this average. In Queensland and Western Australia, at least one council reported that its list comprised entirely council-owned places. In contrast, in Tasmania and South Australia, the maximum proportion of council-owned listed places was one-third of listed places or less.

Table B.2 Local government listed places, by State; survey responses

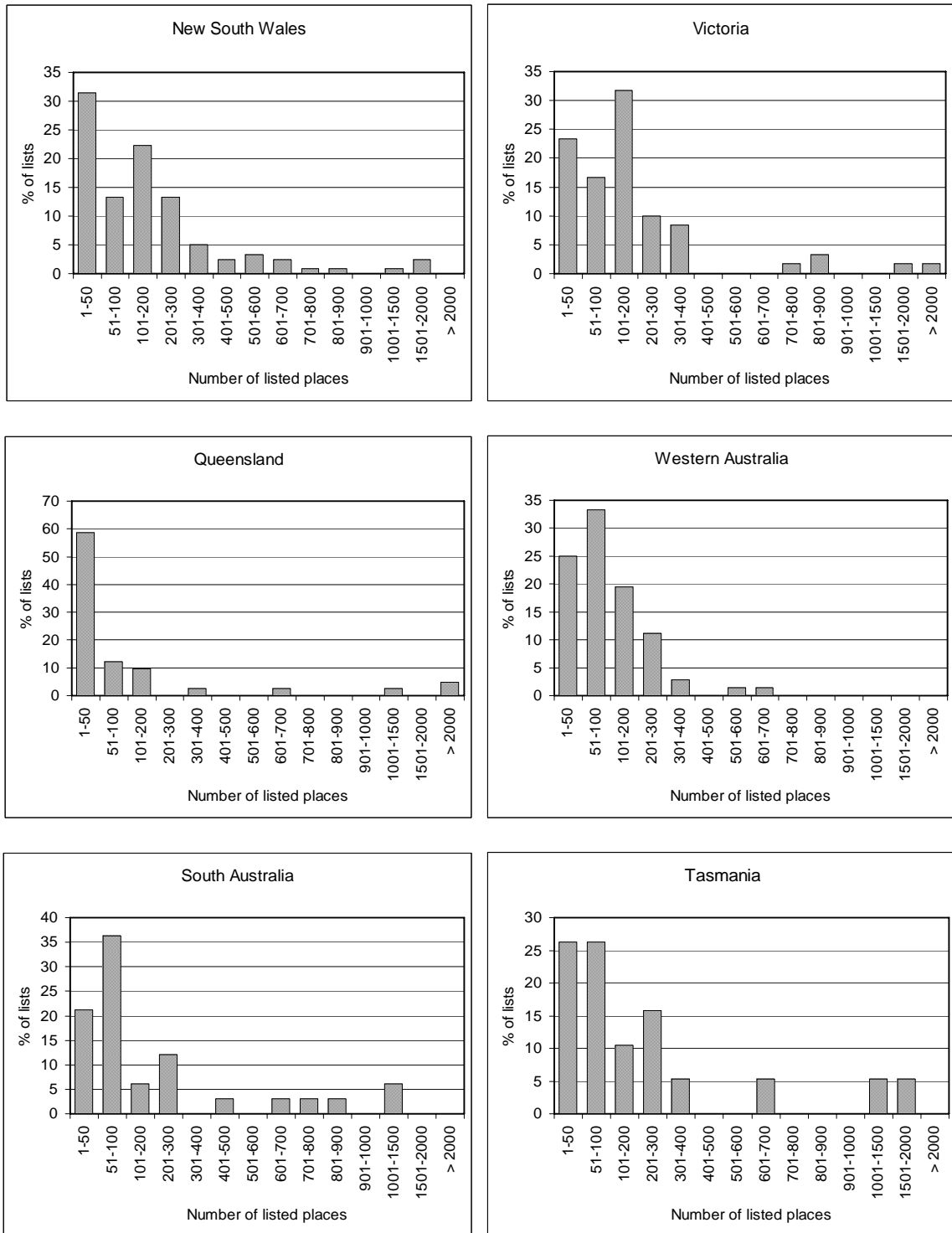
| <i>State</i> | <i>Councils with a heritage list</i> | <i>Individual places</i> | <i>Heritage areas^a</i> | <i>Council owned places^b</i> | |
|------------------|--------------------------------------|--------------------------|-----------------------------------|---|-----------------|
| | % respondents | No. | No. | <i>Average</i> | <i>Maximum</i> |
| | | | | % listed places | % listed places |
| NSW | 93 | 25 847 | 512 | 8.8 | 71 |
| Vic | 97 | 19 183 | 497 | 9.3 | 83 |
| Qld | 42 | 9 852 | 191 | 19.9 | 100 |
| WAC ^c | 84 | 8 178 | 391 | 12.7 | 100 |
| SA | 52 | 7 489 | 92 | 7.9 | 33 |
| Tas | 86 | 5 804 | 87 | 5.6 | 29 |
| Totals | 75 | 76 353 | 1 770 | 10.4 | 100 |

^a Includes historic conservation zones, heritage precincts, streetscapes and special areas. ^b Includes parks and monuments. ^c May include places in Municipal Heritage Inventories.

Source: Productivity Commission Survey.

The composition of statutory lists also differed between States (figure B.1). In Queensland, almost 60 per cent of lists had between one and 50 places. In other States, less than 30 per cent of councils had lists of between one and 50 places. The proportion of lists with over 200 individually listed places ranged from 12 per cent in Queensland to 37 per cent in Tasmania (table B.3).

Figure B.1 Places listed at the local government level



Source: Productivity Commission Survey.

Table B.3 Councils with lists of more than 200 individual places

| <i>State</i> | <i>Proportion of councils</i> |
|-------------------|-------------------------------|
| | % |
| New South Wales | 31 |
| Victoria | 27 |
| Queensland | 12 |
| Western Australia | 17 |
| South Australia | 30 |
| Tasmania | 37 |

Source: Productivity Commission Survey.

B.3 How locally significant places were identified

Table B.4 outlines the means by which local governments identified places for inclusion on their lists.

Table B.4 Sources of identifying local historic heritage places

Average responses^a

| <i>State</i> | <i>Survey/ study</i> | <i>When survey was under- taken^b</i> | <i>Register of the National Estate</i> | <i>State Govt</i> | <i>National Trust</i> | <i>Owner request</i> | <i>Third party request</i> | <i>Other^c</i> |
|--------------|--------------------------|---|--|-----------------------|---------------------------|--------------------------|------------------------------------|--------------------------|
| | % | | % | % | % | % | % | % |
| NSW | 80.4 | 1989 | 3.0 | 9.9 | 13.8 | 2.0 | 2.3 | 4.7 |
| Vic | 86.3 | 1991 | 3.1 | 10.6 | 4.1 | 0.2 | 0.3 | 0.4 |
| Qld | 73.2 | 1999 | 6.6 | 12.9 | 10.8 | 3.7 | 6.9 | 4.8 |
| WA | 67.4 | 1998 | 1.3 | 4.8 | 3.5 | 3.9 | 6.1 | 11.4 |
| SA | 85.5 | 1995 | 3.7 | 12.8 | 4.1 | 0.3 | 0.3 | 0.0 |
| Tas | 24.4 | 1994 | 10.6 | 32.6 | 44.4 | 1.8 | 2.3 | 8.9 |

^a Mean percentages of lists. Percentages may not sum to 100 because some councils identified multiple sources for a single listing. In other cases, councils were not able to identify all the sources of their listings.

^b Median response. The date the original survey was undertaken. The survey may have since been updated.

^c Includes Institute of Engineers list; National Trust Register of Significant Trees; National Parks and Wildlife Service; community committees and local historical societies.

Source: Productivity Commission Survey.

In all States, except Tasmania, the most common method of identification was a heritage survey or study. In New South Wales, Victoria and South Australia, 80 per cent (or more) of locally significant historic heritage places were identified in this way. In contrast, only one-quarter of locally significant places in Tasmania were

identified through a survey or study. Over three-quarters were sourced from Tasmanian State government or National Trust lists.

Surveys tended to be undertaken earlier in New South Wales (where the average survey date was 1989) and Victoria (1991) and later in Queensland (1999).

As averages tend to disguise significant differences between individual councils, table B.5 provides the maximum responses for each source of identification from each State. The maximum response of 100 per cent indicates that at least one council reported that it had obtained all its listings from a heritage survey or study. Similarly, in all States, at least one council indicated that it had sourced all the places on its list from the relevant State government list.

Table B.5 Sources of identifying local historic heritage places

Maximum responses^a

| <i>State</i> | <i>Survey/ study</i> | <i>When survey was under- taken^b</i> | <i>Register of the National Estate</i> | <i>State Govt</i> | <i>National Trust</i> | <i>Owner request</i> | <i>Third party third request</i> | <i>Other^c</i> |
|--------------|--------------------------|---|--|-----------------------|---------------------------|--------------------------|--|--------------------------|
| | % | | % | % | % | % | % | % |
| NSW | 100 | 2005 (1979) | 100 | 100 | 100 | 50 | 85 | 100 |
| Vic | 100 | 2004 (1978) | 100 | 100 | 67 | 2 | 6 | 18 |
| Qld | 100 | 2005 (1987) | 100 | 100 | 100 | 100 | 100 | 80 |
| WA | 100 | 2005 (1978) | 30 | 100 | 70 | 100 | 100 | 100 |
| SA | 100 | 2001 (1978) | 100 | 100 | 100 | 5 | 5 | 0 |
| Tas | 100 | 2001 (1972) | 65 | 100 | 100 | 20 | 20 | 100 |

^a A maximum response of 100 per cent indicates that at least one council in that State obtained all its listings from that source. ^b The date the original heritage survey/study was undertaken for the purpose of establishing a list. The survey may have since been updated or extended to take into account new council boundaries. The maximum response refers to the most recent date a new survey was undertaken in that State. The figure in brackets refers to the earliest date an initial survey was undertaken. ^c Includes Institute of Engineers list; National Trust Register of Significant Trees; National Parks and Wildlife Service; community committees and local historical societies.

Source: Productivity Commission Survey.

In New South Wales, Victoria, Queensland and South Australia, at least one council indicated that it had obtained all the places on its list from the Register of the National Estate. In New South Wales, Queensland, South Australia and Tasmania, the National Trust was the source of all the listings for at least one council.

In Western Australia and Queensland, at least one council indicated that its list consists only of properties that had been listed by owner request.

In all cases the minimum response was zero. That is, for each nominating source, there was at least one council in every State which obtained none of its listings from that source. Dates at which surveys were undertaken to identify locally significant places also varied significantly. For example, in New South Wales, the earliest survey for the purposes of establishing a list was undertaken in 1979; while the most recent was conducted in 2005.

B.4 What information is available on locally significant places?

Councils reported that a range of information was provided on locally significant places. Western Australia had the highest proportion of councils providing heritage information on listed places (table B.6) with over 96 per cent of listed places having some information on their heritage values. The proportion of locally significant places with heritage information was lowest in Tasmania. Over 94 per cent of councils in Western Australia indicated that *all* their places had heritage information (and no council indicated that *none* of its places had such information). The comparable figures in Tasmania were 32 per cent in both cases.

Table B.6 **Places which have information on heritage values**

| State | <i>Places with heritage information</i> | <i>Lists for which all places have heritage information</i> | <i>Lists for which no places have heritage information</i> |
|-------------------|---|---|--|
| | % of listed places | % of lists | % of lists |
| New South Wales | 81 | 66 | 10 |
| Victoria | 91 | 77 | 0 |
| Queensland | 72 | 61 | 17 |
| Western Australia | 96 | 94 | 0 |
| South Australia | 80 | 76 | 12 |
| Tasmania | 53 | 32 | 32 |

Source: Productivity Commission Survey.

Typically, information is provided on request to the public from council offices and local libraries (table B.7). However, a number of councils indicated that they did, or were moving to, also include information about listed places on their websites.

Table B.7 How information is made available to the public

Proportion of councils which make information on listed places available

| <i>State</i> | <i>Council website</i> | <i>State Government website</i> | <i>On request from Council^a</i> |
|-------------------|------------------------|---------------------------------|--|
| | % | % | % |
| New South Wales | 7 | 12 | 81 |
| Victoria | 14 | 4 | 82 |
| Queensland | 29 | 8 | 63 |
| Western Australia | 9 | 0 | 91 |
| South Australia | 20 | 4 | 76 |
| Tasmania | 10 | 80 ^b | 10 |

^a May incur a fee. Includes availability at local libraries and museums. ^b Includes places listed on the National Trust (Tasmania) website.

Source: Productivity Commission Survey.

Information available on locally significant places differs between councils (table B.8). Most councils provide some information on the heritage attributes of each listed place. To varying degrees, they also provide information on the heritage significance of the place; its condition and integrity at the time of listing; its architectural style and information which might be used by the owner in its conservation.

Table B.8 What information^a is provided on locally significant places?

Proportion of lists

| <i>State</i> | <i>Heritage values</i> | <i>Significance</i> | <i>Condition</i> | <i>Integrity</i> | <i>Architectural style</i> | <i>Conservation information</i> | <i>Other</i> |
|--------------|------------------------|---------------------|------------------|------------------|----------------------------|---------------------------------|--------------|
| | % | % | % | % | % | % | % |
| NSW | 84 | 78 | 60 | 54 | 78 | 16 | 14 |
| Vic | 92 | 92 | 75 | 77 | 83 | 18 | 25 |
| Qld | 71 | 68 | 44 | 32 | 42 | 5 | 15 |
| WA | 93 | 92 | 83 | 76 | 74 | 25 | 26 |
| SA | 73 | 70 | 33 | 46 | 58 | 18 | 12 |
| Tas | 53 | 42 | 11 | 26 | 53 | 5 | 0 |

^a Heritage values are the notable features which gave rise to the heritage listing. Significance refers to whether the place is significant at a local, State and/or national level. Condition refers to the condition of the place at the time of listing. Integrity is the extent to which the appearance of the place related to its original appearance. Architectural style relates to an architectural period (such as 'Victorian' or 'Federation'). Conservation information is information provided to the owner on how the place might be sympathetically conserved. Other refers to a range of information which may include photographs and maps, architect, ranking according to its cultural contribution to an area, recommendations for future improvements, and current and previous uses.

Source: Productivity Commission Survey.

Table B.9 summarises the features which are separately assessed when determining heritage values. Most often, only external features, such as the façade, are assessed. It is less usual for the internal features of the property to be assessed. In New South Wales, Victoria and Western Australia around one-quarter of council lists typically assess internal property features for heritage value. In other States, the proportion is 10 per cent or less.

Table B.9 What heritage features^a are typically assessed?

Proportion of lists

| <i>State</i> | <i>Entire building</i> | <i>Façade</i> | <i>Interiors</i> | <i>Gardens</i> | <i>Location</i> | <i>Views</i> | <i>Other^b</i> |
|--------------|------------------------|---------------|------------------|----------------|-----------------|--------------|--------------------------|
| | % | % | % | % | % | % | % |
| NSW | 65 | 50 | 26 | 46 | 46 | 22 | 17 |
| Vic | 67 | 53 | 25 | 57 | 50 | 27 | 23 |
| Qld | 54 | 22 | 0 | 2 | 29 | 7 | 17 |
| WA | 69 | 47 | 24 | 22 | 43 | 15 | 21 |
| SA | 52 | 51 | 6 | 24 | 21 | 6 | 27 |
| Tas | 32 | 21 | 11 | 16 | 11 | 0 | 11 |

^a Categories are not mutually exclusive. Councils may identify all values as separately identified. ^b Various characteristics including: date of construction; social, historical and thematic context; gateways, outbuildings and associated structures; curtilage; relationship to significant families; oral history; architect/designer; archaeological potential; fences; trees; bridges; mining infrastructure; industrial equipment; association with historical event or person; and, photograph of each building/item (present and past where available).

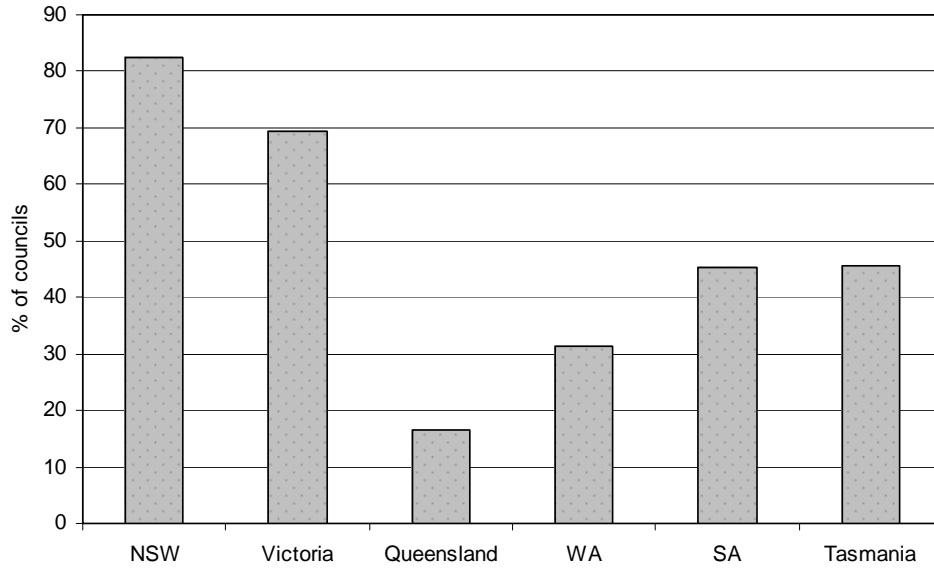
Source: Productivity Commission Survey.

B.5 What assistance do councils provide?

On average, across Australia, half of local councils provide some form of assistance to property owners for historic heritage conservation. The proportion of councils providing assistance is highest in New South Wales, where 82 per cent of councils provide assistance (figure B.2).

Most commonly, assistance takes the form of heritage advice (figure B.3). Invariably, the advice is provided free to owners. One-quarter of responding councils provide grants to owners to undertake conservation works. A little under 5 per cent of councils provide assistance through subsidised loans to carry out conservation work or through rate rebates and concessions. There are various other means through which councils assist property owners. Typically, these take the form of waiving application fees for development applications on listed places. One council, in conjunction with a major paint company, offers subsidised paint for heritage places.

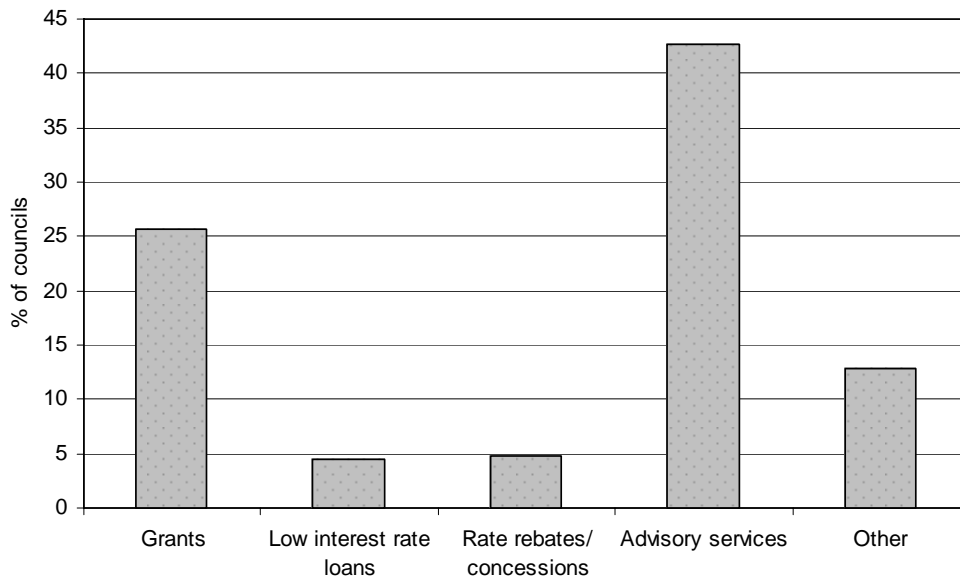
Figure B.2 Assistance provided to owners of historic heritage places^a
Proportion of responding councils



^a Nationally, 50 per cent of councils provide assistance for historic heritage conservation.

Source: Productivity Commission Survey.

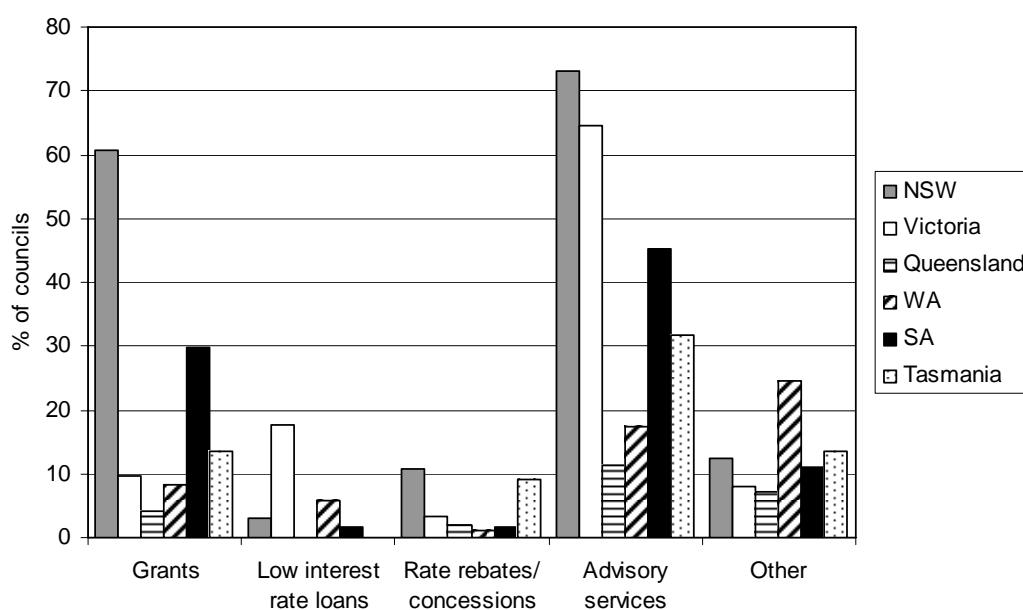
Figure B.3 What type of assistance is provided?
Proportion of responding councils



Source: Productivity Commission Survey.

The type of assistance provided varies significantly between States (figure B.4). Grants are most commonly used in New South Wales and South Australia. Low interest rate loans are more typically used in Victoria. Rate rebates and concessions are more common in New South Wales and Tasmania. Advisory services are more commonly provided in New South Wales and Victoria. Funding sources are not mutually exclusive. Many councils offer more than one type of assistance to property owners.

Figure B.4 Type of assistance by State
Proportion of responding councils



Source: Productivity Commission Survey.

Grants for conservation work

Grants offered by local governments for conservations works normally also require some financial contribution from the property owner. Funding is usually provided to listed places (although several councils indicated that listing was not a prerequisite).

In New South Wales, grants are offered on the basis that the owner contribute a matching amount. A number of councils indicated that their grants program was funded (on a 50:50 basis) with the NSW State Heritage Office. The maximum grant offered to an individual owner in New South Wales ranged from \$5000 in some local government areas to \$500 in others (and averaged around \$2000). One council indicated that grants were only available to low income earners.

In South Australia, property owners were also required to contribute to the conservation costs in order to receive a grant, although the contribution rate varied between 25 per cent, 30 per cent and 50 per cent. The maximum grant tended to be around \$2000; although this varied between \$10 000 and \$250.

In Western Australia, grants are offered by a relatively low proportion of councils. Some councils, while not having a formal scheme, indicated that they would consider a request for funding from property owners. One council reported that it distinguished between commercial and residential applicants (providing up to \$4000 for the former and up to \$500 for the latter).

Several Victorian and Queensland councils indicated that, while a grants program operated, no funds had been allocated in 2004-05. In Tasmania, three responding councils provided grants in 2004-05. In one Tasmanian local government area, grants were only available for community groups (not private owners).

Low interest rate loans

Low interest rate loans were most commonly identified as a source of assistance by Victorian and Western Australian councils. Some Victorian councils offered a loan of up to \$5000 at a low interest rate. In one case, the loan was for up to five years at a zero interest rate. One council operated a \$25 000 revolving fund. Councils in Western Australia offered low interest rate loans through a Heritage Loan scheme administered by the Western Australia Local Government Association.

In New South Wales, subsidised loans tended to be offered for specific purposes (such as a verandah reinstatement program) or on a more ad hoc basis (following requests for assistance from property owners). One council in South Australia reported that up to \$1000 could be borrowed under the scheme and there was no requirement for the property to be listed.

No council in Queensland or Tasmania indicated that they provided low interest rate loans.

Rate rebates and concessions

Rate rebates and concessions were offered by relatively few councils. In New South Wales, a number of councils noted that a reduced valuation for rating purposes could be obtained from the Valuer-General for heritage properties. Some councils also indicated that they would rebate the rates paid by owners of historic properties (in one case up to 50 per cent). Similarly, in Victoria, one council reported that it provided a 25 per cent rebate. One Tasmanian council responded that it would

‘possibly’ provide rate rebates, while another indicated that it effectively provided grants for painting and other minor heritage restoration work through a rate rebate.

Advisory services

Advisory services tended to be offered on a relatively consistent basis by councils with lists across all states. Typically, the service was provided by the heritage advisor engaged by the council, although some councils reported that members of the planning staff were also available to provide heritage-related advice. All councils reported that the service was free to property owners (although some councils placed a limit on the amount of time an individual property owner could spend with the heritage advisor).

Other forms of assistance

This category of assistance generally involved favourable treatment under the local planning code for owners of historic heritage places or assistance with applying for financial assistance and in lodging development applications. Among the assistance identified by councils under this category were:

- assistance with State Government Heritage Assistance Grant applications;
- running grants on owners behalf;
- variation to development standards to assist in retaining building as part of any development/redevelopment of site;
- possible consideration of density bonuses to assist conservation of heritage buildings;
- heritage floorspace scheme which allows owners to sell unrealised development potential of a heritage site to other developers;
- waiving of council development application fees;
- discount heritage paint scheme;
- video available to assist people to understand what ‘heritage’ is about (also brochure ‘demystifying’ heritage);
- heritage concession waiving the need for a development application for restoration works and reinstatement of missing detail;
- colour schemes and construction principles for historic heritage places;
- heritage awards are held every year to encourage and promote conservation of historic heritage places;
- fast tracking procedure for minor heritage applications;

- free heritage information kit; free heritage trails; free heritage planning of appropriate places; and
- free brochures with advice for garages/carports, fences, house extensions.

B.6 Access to heritage advice

Heritage advisors are engaged by local councils to identify places of local significance, to advise on the appropriateness of development applications for listed places and to provide conservation advice to local property owners. In New South Wales and Victoria, more than 80 per cent of responding councils employ a heritage advisor (table B.10). In other States, less than half responding councils employ an advisor, although councils may also have access to heritage advisors employed by other councils.

Table B.10 Employment of heritage advisors
Proportion of responding councils

| <i>State</i> | <i>Councils who employ a heritage advisor</i> | <i>Proportion of heritage advisors employed on part-time basis</i> | <i>Average days per month^a</i> | <i>Access to a heritage advisor employed by another council</i> |
|--------------|---|--|---|---|
| | <i>%</i> | <i>%</i> | <i>No.</i> | <i>%</i> |
| NSW | 82 | 85 | 2.1 | 2 |
| Vic | 84 | 96 | 2.7 | 2 |
| Qld | 9 | 78 | 2.9 | 4 |
| WA | 31 | 93 | 3.2 | 12 |
| SA | 44 | 93 | 1.9 | 6 |
| Tas | 32 | 86 | 5.0 | 0 |

^a For part-time heritage advisors.

Source: Productivity Commission Survey.

Typically, advisors are employed on a part-time basis. A few councils (specifically, major metropolitan or regional centres) employ full-time advisors.

Assistance to employ a heritage advisor is most commonly provided in Victoria (table B.11). Assistance is always provided by the State government and also requires councils to contribute to the cost. In Victoria, up to half the cost of a heritage advisor may be met. In New South Wales, where around half of councils receive assistance, the NSW Heritage Office usually meets one-third of the cost of a heritage advisor and councils are eligible to receive assistance for a maximum of three years.

Table B.11 Financial assistance for heritage advisor ^a

Proportion of responding councils

| <i>State</i> | <i>Councils who receive financial assistance to employ a heritage advisor</i> |
|-------------------|---|
| | % |
| New South Wales | 52 |
| Victoria | 87 |
| Queensland | 0 |
| Western Australia | 7 |
| South Australia | 28 |
| Tasmania | 0 |

^a Financial assistance provided by State Heritage Office or equivalent. In some cases, other sources (such as rural development funds) have also been identified. Normally, the council is also required to contribute to the cost of the heritage advisor.

Source: Productivity Commission Survey.

B.7 Heritage values and development

Listed places typically have restrictions placed on the extent to which owners can modify or otherwise redevelop them. As table B.12 indicates, more than half the responding councils in New South Wales, Victoria, Western Australia and Tasmania reported that **all** works on listed places require prior approval. This applies to both locally and State listed places.

Some councils responded that prior approval only needed to be obtained for work which would impact on identified heritage characteristics. Other councils indicated that maintenance, painting and minor renovations did not require approval or that only demolition or moving a listed building required approval. Some councils indicated that an owner might not be required to obtain development approval if a heritage assessment concluded that the work would be unlikely to adversely affect the heritage significance of the place.

Table B.12 Obtaining development approval^a

Proportion of responding councils

| State | <i>Development approval required for ALL works on listed places</i> | <i>Development approval required for only those works affecting identified heritage values</i> | <i>Other^b</i> |
|-------------------|---|--|--------------------------|
| | % | % | |
| New South Wales | 58 | 19 | 25 |
| Victoria | 53 | 24 | 23 |
| Queensland | 38 | 18 | 12 |
| Western Australia | 61 | 8 | 14 |
| South Australia | 48 | 17 | 22 |
| Tasmania | 82 | 9 | 9 |

^a Applies to State and/or locally listed places. Some councils indicated that modification to items on the Register of the National Estate also required approval. ^b Typically, councils that nominated this category indicated that maintenance, painting and minor renovations did not require approval or that only demolition or changes to the façade required approval.

Source: Productivity Commission Survey.

Tables B.13 summarises the treatment of development applications for heritage listed properties. A number of councils indicated that development applications on listed places were often negotiated between the owner and council prior to lodgement, which reduced the potential for later dispute.

Table B.13 Development applications for historic heritage places, 2004-05

| State | <i>Proportion of development applications rejected</i> | | <i>Proportion of rejected development applications appealed</i> | | <i>Proportion of appeals upheld</i> | |
|-------|--|---------|---|---------|-------------------------------------|---------|
| | Average | Maximum | Average | Maximum | Average | Maximum |
| | % | % | % | % | % | % |
| NSW | 2.8 | 98 | 10.4 | 100 | 4.7 | 50 |
| Vic | 1.9 | 20 | 33.5 | 100 | 31.0 | 100 |
| Qld | 0.2 | 10 | 12.5 | 100 | 16.7 | 100 |
| WA | 2.3 | 100 | 6.6 | 100 | 7.2 | 100 |
| SA | 4.3 | 100 | 16.3 | 100 | 17.2 | 100 |
| Tas | 2.7 | 25 | 11.7 | 60 | 5.0 | 20 |

Source: Productivity Commission Survey.

On average, in 2004-05, a small proportion of development applications for historic heritage places were rejected. The average was highest in South Australia where 4 per cent of applications were rejected. However, rejection rate in some local government areas was much higher than this. In Western Australia and South

Australia, at least one council reported that all development applications lodged by owners of historic heritage places had been rejected.

Appeals by owners against the rejection of their development applications can be high — ranging, on average, from 7 per cent in Western Australia to 33 per cent in Victoria. In all States, except for Tasmania, at least one council reported that all of its rejected development applications were appealed.

The success of owners' appeals against rejection of their development applications also varied by State — ranging from an average of 5 per cent in New South Wales and Tasmania to 31 per cent in Victoria. In all States, except for New South Wales and Tasmania, at least one council reported that all appeals in 2004-05 had been successful. One council reported that a dispute over a development application for a historic building ended when the building was destroyed by fire under suspicious circumstances.

In all States, more than half the responding councils indicated that *no* development applications had been rejected on heritage grounds in 2004-05 (table B.14).

Table B.14 Development approvals and listing, 2004-05

Proportion of responding councils

| <i>State</i> | <i>Councils which rejected no development applications on heritage grounds</i> |
|-------------------|--|
| | % |
| New South Wales | 66 |
| Victoria | 58 |
| Queensland | 68 |
| Western Australia | 73 |
| South Australia | 58 |
| Tasmania | 73 |

^a Includes local government areas where no development applications were lodged.

Source: Productivity Commission Survey.

B.8 Comments from local councils

Below are some comments councils made about current policy arrangements and pressures on, and impediments to, historic heritage conservation in their local areas. In some cases, the responses have been edited to preserve the anonymity of individual councils.

New South Wales

The value of historic heritage

- Heritage conservation and public interpretation is of value to [this local government area] for tourism purposes and is of benefit to its economic development. Council could do with additional funding support from State Government. The Heritage Office are doing their best with limited means but given the importance of Heritage to the community and the devolution of powers to [local councils] more funding is required.
- It is important to broaden the public's understanding of the importance of heritage to the community and the value of property. Public relations is an important part of the process for a community to accept heritage as an asset rather than a liability.
- There is a need to protect the heritage of the area for its cultural, scientific, social and economic value to the community. Also, the demolition of existing fabric/building imposes a very significant cost in disposal of materials, which also needs to be factored into the environmental impacts of development.
- Conservation of the history and character [of the local government area] is intrinsic to shared [community] values in economic, social and environmental terms.
- The conservation of our heritage assets is fundamental to the retention of the unique character of [this local government area].

Pressures on historic heritage conservation

- At the Community level there is increasing awareness of the 'value' of heritage items. As property values are rising, property developers are seeking larger blocks of land. Many of these have heritage items and the issue of heritage curtilage is arising as development is encroaching close to heritage items.
- Council is currently reviewing heritage items in urban areas. Antipathy and lack of support from community are major obstacles.
- Heritage is of significant value to the local economy ... There are however continuing perceptions with the community that heritage conservation is obstructive ... The LGA is undergoing rapid change due to continuing in-migration of retirees and the sea change phenomenon. This is placing pressure on Council to approve changes to the older structure and heritage fabric.
- Minimal restoration other than on Council owned buildings.
- The development industry in general appears to hold and promote a negative attitude toward heritage conservation. The issue needs attention, perhaps education/strategies to improve the perception of heritage listing; to encourage the revitalisation of heritage sites; to celebrate rather than lock up and condemn these sites.
- The population of the local government area is growing rapidly. There are no conservation areas, and the majority of the listed items are individual houses, many of which are small and/or fragile. They are therefore subject to considerable development

pressure, aimed at replacing them with larger houses or multi-unit developments. Council encourages sympathetic extension and offers heritage incentives (ie. planning concessions on permitted uses, floor space ratios, parking) to encourage conservation.

Funding for historic heritage conservation

- Insufficient funds are provided to assist private owners (and government departments/councils). Heritage is a community value but conservation is primarily funded by owners. Too few heritage practitioners in regional areas. Too many planners, architects of building designers have a low opinion of heritage values and see it as a burden.
- Additional incentives are required for owners of heritage items. Additional funding towards conservation management in the form of larger grants are required. Council owned and managed items are ineligible for heritage grants and this results in poor maintenance ... The Commonwealth could provide greater financial support to heritage than is currently available.
- Further assistance either financial or through free heritage consultants should be provided to Councils. This is needed to: (1) increase the funds available for heritage conservation grants to property owners (2) provide or pay for heritage advisor for Council (3) assist in funding the management of heritage reviews (4) assist in funding development applications, additional assessment processes for heritage properties.
- Local government in NSW has great support financially from NSW Heritage Office.
- More funding should be made available to assist in the conservation of valuable places for future generations to see.

The current policy framework and how it can be improved

- Further advice and assistance on the best means of exercising some legislative controls over items listed in council's inventory of heritage items would be greatly appreciated. Some sort of easy to digest/use presentation in the form of a CD and associated handout for use at public forums and community gatherings that introduces heritage and conservation values would be very, very useful.
- Council has been limited to individual items not whole areas. The heritage items in the area are mostly listed for architectural/aesthetic value... Heritage is accepted by majority of residents and in many cases residents are well organized to defend their heritage. State government policy on introducing medium density housing is destroying heritage in this local government area. Many listed items are being demolished with State government approval.
- Council has conducted a complete review ... to update its heritage inventory. The Council area was divided into precincts and each precinct carefully analysed and potential heritage items and conservation areas identified. Draft Local Environmental Plans have been prepared and submitted to the State Government. However the plans

have not been progressed due to ‘potential conflicts’ with future regional strategies to be prepared by the State Government. Council does not agree with this opinion because many of the items/areas are in locations unlikely to be affected by regional strategies.

- Considerable Council effort goes into staff skills/knowledge and the interaction between the Council and the community to foster an understanding and appreciation of the area’s history and heritage. The heritage adviser, and the advisory service, add to the Council’s skills and promotion base.
- The most critical issue is the cost burden on local government in caring for and managing heritage listed places in its asset portfolio. Unlike other tiers of government, many assets cannot be sold as they are essential elements of community infrastructure — eg pools and libraries — many of which are heritage listed.
- Property owners see listing as a negative outcome for property ownership and resale value. There is little funding at State or local level to support conservation of local items. The NSW Heritage Office, which promotes the listing of local items (of which there are thousands in NSW) offers financial support to property owners for essential maintenance but places responsibility for managing that process on local government. Current legislation is also geared towards built items and offers no real management solutions for significant landscapes, trees and archaeological sites.
- Recognition has not been given in the past to historical buildings and trees preservation. Council has many buildings of significance, however they have never been listed. This is due to the process in gaining listing (red tape) and cost associated. Also people lose interest due to the miniscule grants available and their own lack of commitment to such a program. Very disappointing to lose many good buildings.
- The emphasis is on the adaptive reuse of heritage buildings so that Council encourages owners to find uses that assist the retention of the building.
- The following issues should be addressed by the inquiry: (1) perceived conflict between conservation areas and achieving urban consolidation outcomes (2) need for increased community education and (3) legislative powers for requiring owners of heritage places to maintain significant heritage assets.
- The process for listing items of Heritage Significance on a Local Environmental Plan (LEP) is lengthy. The ability for councils to make Interim Heritage Orders (IHOs) helps. Listing together with planning controls does not always help given that in NSW the majority of items are locally significant meaning that there is no mechanism to enforce maintenance.
- ... Council supports the conservation of historic heritage places in [this local government area], mainly through its planning and development controls ... Council recognises the need for more heritage incentive schemes and assistance for heritage conservation — that is, more and flexible private and public funding sources. This will become even more important in the future with economic pressures for more residential development, greater residential densities and the increasing price of land.

-
- There needs to be more powers available in instances where there is wilful neglect of heritage properties, especially where they are owned by Government Instrumentalities.
 - We as council have to work on strategies to improve the image of heritage and give more active help to property owners in assisting them with conserving their buildings, not only through advice but incentive schemes.
 - We have had very good results by negotiating with developers to get results.
 - While there is a heritage advisor and a council employed heritage officer, the advice given to council is often discounted in favour of development. This has precipitated a range of very poor outcomes for the protection of local and State heritage items. The Heritage Office have not been strident in support of us locally with reasons ranging from 'the system' to understaffing and budgetary constraints.

Victoria

The value of historic heritage

- Council has a responsibility, as does the community to preserve the important links to our past for present and future generations. A heritage study is the principle means by which a municipality can carry out an inventory of those places within the municipality that may be of importance to the community and to future generations. The identification of heritage places is an ongoing process and council is committed to preserving these places.

Pressures on historic heritage conservation

- In a lower socioeconomic [area], it is difficult to encourage preservation or restoration of heritage buildings that are privately owned. Often it is just conservation works that are undertaken.
- Where heritage interest and economic interests clash, (particularly the further the place is from capital cities) there are huge 'pressures' in favour of development (particularly in Rural Towns where development is patchy or in decline). Heritage interests can be severely compromised.

Funding for historic heritage conservation

- Heritage is a major (and ongoing) commitment for Council. However as most European heritage places in [this local government area] are privately owned, it is difficult for Council to enforce/encourage maintenance and restoration. Is there an opportunity for more accessible Federal or State funding (for public grants etc.)?
- If a building is considered to be historically significant enough to be placed on a register for the benefit of the community, then there should be some corresponding financial assistance available to assist with its preservation.
- Lack of funding is leading to ongoing degradation.

The current policy framework and how it can be improved

- Pre-application is strongly recommended and a negotiated application/resolution means that few applications get to Council that are refused outright. Additional funding is needed to support owners with heritage properties. Particularly those that have redundant building types, for instance log huts used during land selection. If no assistance is offered these buildings will be lost.
- Review of Heritage study is anticipated for which it is not expected that State government funding will be available. Difficulties arise when property owners circumstances do not allow them to match funding or access low interest loans. Issue of 'demolition by neglect' needs to be overcome.
- Council has strong views regarding State heritage laws. Council believes these laws place an unfair burden on ratepayers.
- ... currently undertaking 'heritage gap study' which picks up those sites in [this local government area] not previously identified, ie. mainly post Victorian and significant trees and landscapes. Given the cost of the study (approx \$150 000) this means that the study is undertaken over approximately 3 financial years - there is no financial assistance that can help Council undertake this work. Note: a local philanthropic organisation has contributed approx \$20 000 to this project. Overall, the statutory system works well - consistency re: what is expected in heritage studies and benchmarks for justifying heritage protection is a moving beast and often frustrating.
- Land tax relief should be available to heritage places on a municipal register - this is available for places on the State register. Local government should have the power to serve maintenance orders - this is available to Heritage Victoria for places on the State Register.
- Local government plays an important role in heritage protection and education. Generally to a much greater degree than higher levels of government. Local government invests very significant resources (time, money and staff) to identify and protect local heritage and more recognition of that role would be welcomed. Not just financial assistance but technical advice and leadership would be of great benefit.
- Requirement for permits increases delays in building works — this isn't compensated for enough by Council funding. (We need a better 'fast-track' permit system for heritage applications.)
- Resourcing makes it difficult to maintain currency of heritage listings, assess proposed listings and to implement new heritage studies. Proactive promotion of heritage values is limited. Relationships between local heritage controls in the planning scheme with other levels of control are not straightforward.
- Stronger measures in the provisions of the local planning scheme are required to ensure compliance in development of heritage places. Heritage overlay is considered adequate in the conservation, restoration and retention of heritage places, but it is considered inadequate in protection of indigenous properties and sites.

-
- The cost incurred by local authorities through the continual process of identifying and protecting places of significance is an ongoing issue.
 - The current Heritage study was finalised in 1988 and is in need of review as there are some cases where structures no longer exist or where entire townships ... are inside a heritage overlay and this may be too restrictive on use and development.
 - One significant issue is that elements of the community attempt to use heritage as a means of prohibiting or limiting development. This is especially due to State Government policies supporting higher density development in inner-city areas. A challenge is to dissociate heritage issues from this broader political context and to protect only those places that meet the threshold of cultural heritage significance.

Another important issue is that the cost of heritage assessment work is often prohibitively expensive. Although a relatively well-resourced local authority, [this council] constantly struggles to find a sufficient budget to complete the required on-going heritage work... Greater financial and/or Heritage Advisor assistance to local government, especially in light of the volume of heritage places local governments are responsible for managing either directly (Council-owned) or indirectly (through planning permit application assessments), is required in order to appropriately manage Australia's heritage resources.

The final significant issue ... is the lack of consistency between Federal, State and individual local government assessment criteria for cultural heritage significance, heritage policy and guidelines for the management of heritage places. The lack of consistency means that considerable time and expense is invested in individual government bodies developing their own criteria, guidelines and policies. In addition, the lack of consistency creates uncertainty for owners of heritage places potentially resulting in negative planning, conservation and economic outcomes. Whilst the AHC assessment criteria has been largely touted as an appropriate standard for assessment, it's application to local heritage places is not always easy or desirable.

Queensland

The value of historic heritage

- Some Local Governments place very little value on the conservation of items and places of historic/heritage significance for diverse reasons including: (a) a development at all costs approach (b) a next election focus that stymies strategic vision (c) the mistaken belief that unchecked development is ultimately sustainable (d) the failure to understand that once a place or an item is 'lost' to development/ change, the cost of reconstruction/reconstitution, no matter how humble or ephemeral the object or environment, increases often to the point of prohibition (e) failure to understand that the integrity of authenticity drives much of the cultural tourism throughout the world. The potential costs to an owner of a heritage site in maintaining the heritage place is an issue that poses problems. Financial assistance in order to identify heritage places, assess their level of significance and help prepare appropriate criteria to guide

development is very useful but hard to come by. Until the benefit can be seen it is difficult to get movement in the direction of protecting and maintaining cultural heritage places.

Pressures on historic heritage conservation

- Heritage listing is generally not supported by owners due to perceptions of loss of value, difficulty in obtaining insurance, additional time and cost in development applications, exposing projects to public submissions and submitter appeals etc. It is hoped that recently introduced financial incentives will assist in overcoming this opposition. Queensland law has provision for compensation to be paid if a development application is made within two years of a place being listed and the local authority elects to assess it under the new listing rather than the superseded plan. This provides a two year window of opportunity for potential loss of a place following its listing.
- In the current climate of rampant development in [this area] and the need to maintain the viability of small towns (ie. we are all competing for the 'tree change' dollar) it is very difficult to conserve the places of local significance when council is keen on attracting development ... Our town has many timber dwellings spanning many years which provide a good indicator of past boom times. The desire for people to live in huge brick homes means these timber homes are demolished or removed changing the character of the town.
- The future maintenance costs for heritage buildings in the CBD and buildings under ownership of community organisations (eg Masonic Lodge Halls etc) will be a major factor in Council's consideration of development applications. Ensuring heritage buildings continue to offer economical and functional standards to owners will become one issue which will be raised by owners and may affect how [this Council] responds to ongoing maintenance and development proposals in the future.

Funding for historic heritage conservation

- Australian Government funding for Council would be beneficial. Australian Government Funding (Tax Incentives) for owners would be beneficial. Australian Government/State Government assistance to make it easier for people to insure their heritage places.
- Active and supported Heritage Incentive Scheme that would positively motivate heritage property owners to repair and maintain buildings would be helpful. But many factors involved and a wide range of opportunities for personal benefit needs to be investigated.
- [Council] has 2 sites nominated as heritage places and both are owned/run by community organisations with limited funding in the short term. These facilities are well maintained, however, long term they will require funding assistance to ensure the facilities are well maintained.

-
- Financial assistance from State or Federal Government is required for Heritage Advisory Services offered by local government in Queensland. Similar to that granted in other States. Protection of conservation areas/heritage precincts is a more palatable way to introduce historical heritage provisions/requirements in local government areas. Little support from public for individual heritage listing - seen as discriminatory.
 - [The issue of heritage advisors] is important because [this local government area] like many other small to medium sized councils is unlikely to have the resources to satisfactorily deal with this important issue of initially identifying the most significant sites and thereafter providing advice.

The current policy framework and how it can be improved

- [This local government area] has many more sites/places that can be researched, however, resources do not allow this to happen. Our cultural heritage study has only scratched the surface of a long list of potential places that require assessment. Budget constraint have hindered a fuller compilation of sites/places. Community awareness of heritage issues is important and more time and research is required with residents and historians to discuss heritage legislation, conservation and education.
- The current planning legislation in Queensland actually acts as an impediment to achieving good heritage outcomes because the ... process inhibits flexibility and open negotiation.
- There still appears to be some public confusion about the different registers (local, State and Federal) and the various processes for each of these registers.
- While Queensland's Integrated Planning Net seeks heritage sites to be included, there is no funding support for heritage surveys, heritage advisors, or for incentives for property owners. Therefore many local government authorities have not included heritage sites in the planning scheme.

Western Australia

The value of historic heritage

- The Municipal Inventory and its preparation has involved the community in contributing information and has raised the level of awareness of heritage places. Council also issues a President's Heritage Award annually to recognise conservation or promotion of heritage places.

Pressures on historic heritage conservation

- People are either conservation minded or not. Many people still believe there are disadvantages to their property/place becoming State or National Heritage listed. The cost of conservation work in rural areas is generally more expensive than in metropolitan areas as materials and tradespeople have to be sourced from outside the district.

-
- There are a number of misconceptions in respect of the impact of heritage listing on the owners perceived property rights. This has arisen unfortunately due to scaremongering, especially by the real estate and development fraternity in relation to the effect on property values. Additionally there is also an entrenched fear of using heritage experienced architects for design works due to the predominate use of designers/drafting services, especially among builders specialising in renovations/additions.
 - [This local government area] receives minimal financial assistance and support at the National and State levels. Conservation assistance to private property owners is ad hoc and re-active and is well below the levels needed to properly preserve the heritage of [the area]. Demolition by dereliction is possible for many heritage buildings where they are allowed to reach a stage of structural unsoundness. All public buildings on the National or State Registers should be the total responsibility of those levels of government. Many heritage buildings in Australia were not designed for a 200 years plus life and may not be sustainable into the future unless they are structurally modified. In heritage assessments there appears to be a missing value of functionality as the function and use will determine long term sustainability. Vacant structures will decay much faster than those occupied and used.

Funding for historic heritage conservation

- There has been a lack of support by State and Federal Governments providing meaningful heritage incentives to owners of heritage places that are only on a local municipal heritage inventory and not on a State heritage list. (0% of financial incentives are available to these owners) local government is largely left to its own devices to conserve local heritage places.
- Funding required to provide an incentive or owners to retain or upgrade building of heritage significance. A lot of these buildings are being left to run down and there is no authority to request land owners to maintain or upgrade building.
- The [Council] is making every effort to preserve and maintain the sites it owns. Several years ago many buildings of significance were destroyed as safety hazards. [There is only] one remaining building of significance in private ownership.

The policy framework and how it can be improved

- Heritage protection at local government level is always controversial because the Council must try to balance the community's wish to preserve heritage buildings, with the owners' rights and wishes to redevelop... This has caused the Council to accede to owners' requests to delete some places from the [Municipal Heritage Inventory (MHI)] whenever the owners request. Many Councillors sympathise with the owners' rights to capitalise on the full value of their land, which is seen to be jeopardised or reduced if the place has any level of heritage rating... It would be helpful for the State planning authority to prepare sample heritage 'zoning' provisions for use in local Town Planning

Schemes. Fear of compensation claims by owners is a deterrent to local governments listing privately owned properties.

- It appears that heritage lists have very little weight at appeal tribunals.
- Small LGAs with small rate taxes cannot afford to offer rate rebates. The cost of reviewing Municipal Heritage Inventories is very high and it would be better if these funds could be used to offer owners incentives. But legislation requires that MHI be reviewed.
- The [Council's] criteria for listing on the Municipal Inventory is based upon the contribution the residence or group of residents makes to the streetscape.
- This council has a significant number of places which would fall into the category of 'character' rather than heritage (although we have heritage places too) and it is more successful to achieve retention when determination is made and negotiations undertaken at officer level than at Council, although this is getting better.

South Australia

The value of historic heritage

- Conservation of heritage places has added to the townships within this Council area, attracting tourists and residents.

Pressures on historic heritage conservation

- When privately owned buildings are put to an economic use the heritage conservation is improved. A number of notable examples occur in this area. State/Federal governments should get some relief/grants to buildings.

Funding for historic heritage conservation

- Additional financial assistance should be made available to Local Government and/or to the owners of historic heritage places by way of State and Federal Government Grants/Programs. The formal processes of actually identifying and legally using places of historic heritage significance could be simplified and made less costly.
- More could be done to encourage rural and remote local government bodies to support local heritage conservation if adequate funding was available from either State or Federal Governments. Expecting local government to fund local heritage is merely an extension of cost shift. Local heritage conservation is not a core function of local government.

The current policy framework and how it can be improved

- Council had a voluntary approach to local heritage listing (only if owners agreed to list) ... Council has adopted a mandatory approach and will soon add an additional 30

places to the Development Plan. We have found financial incentives to be unsuccessful due to the insignificant amounts involved.

- Council is totally responsible for the maintenance and management of its local heritage list. The State Government is keen to have some State heritage listed buildings on the local register.
- In South Australia, we have a Commonwealth listing under Commonwealth legislation, a State heritage list under the Heritage Act, and local heritage lists contained in individual Council's Development Plans, prepared in accordance with provisions of the Development Act. Local heritage is a fairly recent innovation (10-15 years), and voluntary on the part of Local Governments. Individual councils have become involved because of local pressures, and because they have the resources to do so. There are signs now that the State Government will force local governments to be involved in local heritage and reduce their own involvement in State heritage. Smaller Councils simply do not have the capacity to become involved in a significant way.
- Local heritage places are only special and representative examples and a very low percentage of total character valued. More emphasis in historic areas (inner city) should be on collective character protection and heritage/historic/character areas or overlays. Currently in South Australia such a hierarchy of area status and control, and criteria for same, is missing. Further the process of listing places in a Plan Amendment Report process, even with interim effects, is too cumbersome and slow. Need an initial emergency/interim order process for protection until full investigation and processing occurs/follows.
- Requirements for Conservation Plans for State Heritage Places are onerous and over-prescribed. This means owners and Councils avoid carrying out these plans due to exorbitant costs.
- The council has made a significant effort to maintain and enhance built and cultural heritage. However funding assistance from State and federal levels has been extremely limited. Council convenes a Heritage Advisor group. Council also retains the services of a heritage consultant. There is an increasing need for this service.

Tasmania

The current policy framework and how it can be improved

- Our planning scheme and assessment of development applications relating to heritage properties/areas will be improved by the introduction of heritage overlays and codes, picking up on heritage values and lessening the reliance on the Tasmanian Heritage Council (although relevant principles will still be concurrently assessed under the Heritage Act).
- There appears to be many properties with heritage values but are not listed possibly due to a reluctance by the property owner of losing control over their property.

-
- There needs to be a national system, agreed by all States that clarifies the 3 levels of heritage significance — local, State and national. Sites that are only locally significant should be under the jurisdiction of local government. Sites that are of State significance should only require consideration by (in Tassie’s case) the Tasmanian Heritage Council.

B.9 Survey questionnaire

A copy of the survey questionnaire is attached.

1. Does your Council maintain a statutory list of locally significant historic heritage places?

(This may be referred to as a schedule to a local environment plan; heritage overlay; heritage list or planning scheme)

(please tick as appropriate)

No

(if no, please go to question 5)

Yes

a) How many individual places are listed on it?

.....

b) How many heritage areas, precincts or conservation areas are listed?

.....

c) What percentage of listed places are Council-owned?

%

2. What percentage of the list was drawn from the following sources?

a) survey/heritage study

%

(please indicate when the surveys/studies were conducted)

.....

b) Register of the National Estate

%

c) State Government list

%

d) National Trust list

%

e) owner request

%

f) third-party request

%

g) other (please specify)

.....

.....

.....

(Please note that careful estimates are acceptable if actual data are not available)

Questions continued over.../

3. Is documentation available for ALL places on the list which includes information on the place and the reasons for its listing?

(This documentation may be incorporated into the list, in a heritage assessment, heritage inventory or heritage survey, or in some other form)

(please tick as appropriate)

No

If no, what percentage of listed places would include such documentation?

a) None

(if none, please go to question 9)

b) Other %

Yes

If yes, is that documentation publicly available?

a) No

b) Yes

Please indicate how public access to the documentation is obtained

.....

.....

.....

.....

(Please note that careful estimates are acceptable if actual data are not available)

Questions continued over.../

6. Does your Council employ a heritage advisor?
(please tick as appropriate)

No

Do you have access to a heritage advisor employed by other Councils?

No

Yes

(please indicate on what basis that access is provided)

.....
.....
.....

Yes

On what basis is that advisor employed?

Full-time

Part-time

(please indicate average days per month)

.....
.....
.....
.....

7. Does your Council receive any financial assistance to employ a heritage advisor?
(please tick as appropriate)

No

Yes

Please specify amount and source of financial assistance.

.....
.....
.....
.....
.....
.....

Questions continued over....!

8. Does your Council require prior development approval for ALL works on listed heritage places?
(please tick as appropriate)

Yes

No

If no, is prior consent required

a) only for works which would alter specifically identified heritage features (eg. façade)?

b) other? (please specify)

.....
.....
.....
.....

9. What percentage of Development Applications for places considered to have heritage significance were rejected PRIMARILY on heritage grounds in 2004-05?

%

a) Of those Development Applications rejected, what percentage were appealed against?

%

b) Of those appealed against, approximately what percentage were successful?

%

(Please note that careful estimates are acceptable if actual data are not available)

Questions continued over....!

