

**Adelaide Parklands Preservation Association
submission to Productivity Commission**

The Commission's Draft Recommendations on Conservation of Australia's Historic Heritage Places principally address issues of built heritage. However APPA is concerned that some of these recommendations could have negative implications for the conservation and preservation of the Adelaide Parklands.

We find it difficult to assess the extent to which such negative impacts might be intended, but throughout the Commission's report there appears a theme of weakening the extant conservation and protection framework. For instance, (i) Draft Recommendation 7.1 relates to abolition of the Register of the National Estate, and (ii) Draft Recommendation 9.8 suggests State governments relinquish critical aspects of conservation legislation in favour of local government planning schemes.

In reference to the report's apparent determination to allocate an upkeep cost to heritage items, we do not believe it possible to credibly identify a heritage "cost" component associated with the Adelaide Parklands, any more than it would be to "cost" a sunset.

The report does not clearly enunciate any distinction between built, cultural and natural heritage, and we are therefore uncertain of the extent to which the report's draft recommendations may apply to the Adelaide Parklands. However, should there be any such application, or any negative implication whatsoever, this Association would vigorously oppose the Commission's findings.

We note further that the report discusses "statements of significance" as a tool to determine preservation value. Such statements would not seem appropriate for those environments where the significance may not be in an individual built form, but rather in an overall precinct, streetscape, or landscape (for either its cultural or its natural values).

26/01/06