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submission

Heritage Enquiry  
Productivity Commission  
PO Box 80  
Belconnen ACT 2616

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Dear Sir,

I thank you for this opportunity to comment on your draft report into Heritage Listing.

My focus is on privately owned property rather than public property but in most cases my comments apply equally.

*First, let me congratulate the Commission associated with the implementation of the current approach to heritage listing and suggests some on a very comprehensive draft report dealing with a very complex issue. It identifies most of the problems innovative and positive solutions all of which I support.*

What it does not seem do however is address the core criteria for determining whether heritage listing is appropriate in the first place. Should there be an age limitation for example or could a property be listed the day it is built.

The Burra Charter attempted to provide some broad guidelines but as the draft report correctly states, governments, federal, state and local have imposed their own interpretations leading to wide inconsistencies.

I cannot speak for other states but the NS W Heritage Assessment Criteria are, in my view in urgent need of review.

My recent experience with a local council proposing to list a private residence (against the owners wishes) revealed how subjective the current criteria are. The proposal *was* basically to list all the works of an architect who had undertaken some projects for the council years ago and the proposal was supported by Heritage consultants.

The architect was as talented as many others of his day but had never won any awards, never published any papers or books, never been recognized by his peers either nationally or internationally. Surely the most reliable assessment of merit comes from ones peers not persons outside this circle who are likely to have vested interests.

The closest relevant criteria was (b)"An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW cultural or natural history(or the culture or natural history of the local area)"

Importance to whom?

When teasing out the answer to this tangled question one often finds minority interests.

Fortunately, by a small majority council decided not to proceed with the proposal but during the discussion one councilor expressed concern that his council did not have as many heritage listed properties as surrounding councils had with no apparent concern for the merits of such listings. This demonstrated to me that the heritage process was out of control

With changing demographics questions of "importance or significance" are dynamic and will mean different things to different people or groups of people at different times.

As the commission has, [ believe, identified a more relevant question, is `what benefits will be derived for the community from heritage listing this property and do the costs justify the benefits".

Benefits could include those of an economical, historical, cultural or architectural nature.

I submit that all proponents of heritage listing should establish a clear case focused on community benefit and cost justification.

There are many recent examples of councils and consultants wrestling with the current criteria such as the army barracks (Liverpool) arid project homes (St Ives) which suggests that the current systems is being carried to the extreme probably, I suggest, due to vague and therefore unworkable criteria.

The terms of reference seems to allow consideration of the core criteria indeed the value of the enquiry would be questionable if they did not. They are the fundamental foundations of the heritage concept.

I therefore respectfully ask the commission to provide for a review of the core criteria in each state with a view to establishing a common, workable, national approach to this complex, issue including clear, precise guidelines for anyone responsible for considering the merits of Heritage listing properties particularly private properties.

Yours faithfully

E K Anderson