

COMMENTS ON THE PRODUCTIVITY COMMISSION'S DRAFT REPORT ON THE CONSERVATION OF AUSTRALIA'S HISTORIC HERITAGE PLACES

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It should be noted that I am an elected member of the Adelaide City Council and some of my views are incorporated in its submission. This, however, is a personal submission. It rests on my experience as a central city councillor, as a long-standing member and chair of the then South Australian Heritage Committee and as a Commissioner in the South Australian Environment Resources and Development Court. My experience in conservation is a long one and I was, in fact, a member of the Hope Inquiry into the National Estate. That said, I wish to make a few comments on the Commission's Draft Report.

- 1) The Commission has adopted a wide definition of the term "place". The definition encourages the listing of heritage items in their setting and this is a very positive aspect of the report. However, it should also be noted that the Commission's primary mechanism for ensuring conservation is not readily applied to these more complex listings.
- 2) The term 'Historic' used in the Draft Report is unfortunate in that it cuts across the criteria for listing and hence is misleading. (OED 'Historic' = 'famous in history, normally used of past events'.) Such is only one of the criteria normally used for listing. Other criteria, by implication are downgraded by the use of this terminology.
- 3) The Terms of Reference instruct the Commission to examine "the economic, social and environmental benefits and costs of the conservation of historic places in Australia". (my underlining) The draft report is silent about the cost of its primary recommendation. The Commission enjoins others to be more open about the direct and indirect costs of conservation and fails to meet its own standards in this respect.

- 4) The draft report details only one primary mechanism for conservation. It is not a measure that fits all situations. It is my view that other mechanisms need to be developed which are likely to be successful in a wide range of situations: rural, suburban and inner city. I urge the Commission to broaden its set of recommendations and to address a range of measures to ensure more effective conservation of heritage places.

- 5) It has been a feature of listing processes that they are open to public scrutiny. Commonly, in South Australia, councils make listing proposals available to the general public. They allow representations to be made by the public at large and by the owners of potentially recognised heritage properties. Objections are made and comments heard in public sessions and are included along with the Council's final recommendations for listing when it submits them to the State Government for approval. Thus it can be seen that listing processes are open to public scrutiny at several points in the process. The mechanism proposed by the Commission appears to be a matter of private negotiation between owner and the administering body. It does not appear to be an open process, or to be one that takes into account views of the general public or the immediate adjacent owners. It insufficiently recognises the public interest in the means as well as the ends of conservation.

- 6) It is disappointing that in its desire to improve conservation outcomes the Commission has placed so much emphasis on a single mechanism. Other less bureaucratic measures which offer other incentives to conserve are neglected: taxation relief is an obvious example as, indeed, are councils' heritage grants schemes. It is my view that 'carrots' with relatively few strings attached are a more effective way to encourage conservation.

- 7) In my view the Commission's Draft Report pays insufficient attention to measures which better inform the public on how and why conserve Australia's heritage. Because it is essentially a private one, the primary mechanism proposed is not an effective tool in this respect.

I was impressed at the latest hearing in Adelaide of the Commissioners' grasp of conservation procedures and practices and their purposes. It is my hope that this understanding can be applied to develop a wider, more sophisticated set of recommendations in the final report.

Thank you for this opportunity to comment.

Dr Judith Brine

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