

Scanned copy of original submission

CITY OF NEDLANDS

Comment by David Kelsall, Heritage Architect. February 2006

ON DRAFT HERITAGE REPORT - (Draft report)

"CONSERVATION OF AUSTRALIA'S HISTORIC HERITAGE PLACES"

prepared by

Productivity Commission of the Australian Government.

Seeking the Terms of the Heritage Agreement

The Draft Report proposes that the heritage agreement is to form the basis for recognition and financial support for places considered to be of heritage significance. For anyone entering such an agreement, certain processes have to be undertaken to ensure 'unknowns' and legal complexities are reduced to a minimum.

The Conservation Plan by James Semple Kerr

Since 1990, the publication The Conservation Plan by James Semple Kerr with its widely accepted conservation policy process has been the norm in the heritage industry. Usually, little progress can be made when applying for grant funding etc. until a conservation plan has been prepared in accordance with Kerr's guidelines. This conservation plan is recognised as providing fundable credibility to the project.

The basic stages of Kerr's document, The Conservation Plan are as follows:

1. Determine the heritage significance of a place, etc;
2. Propose compatible uses; and
3. Collude with the interested parties to determine conservation policies for the place.

It can be seen that a determination of costs and the scope of any heritage agreement could only be reached at the completion of stage 3 of that process. Yet this Draft Report is suggesting that many of the steps set out by Kerr can be by-passed by introduction at the outset of the process.

The Draft Report proposal

The Draft Report on page xxxi. para 3 is promoting an alternative process which will be very difficult to quantify, particularly in terms of cost, to the degree required for the parties to enter the heritage agreement. One also has to ask the question as to how a conservation plan for a place could be prepared objectively, later, when a heritage agreement is already in place.

Are there any other heritage processes as an alternative?

It is accepted that the conservation process set out by James Semple Kerr may not be the only acceptable procedure, but it is probably the one most widely accepted in this country. The initial conservation process set out in this Draft Report therefore needs to enunciate some alternative to The Conservation Plan to enable the parties to complete a heritage agreement. Without all of the issues being clearly settled, no one could, or would enter into such a heritage agreement.

Terminating the Agreement

Another issue is the suggestion that a heritage agreement lapses if a party does not meet their obligation. Thus it is possible for a place of enormous heritage significance to be lost so simply when the community thought it was safe. That sounds like volunteering to go to gaol for the free board and lodging with a 'Get out of Goal Free' card in your pocket. The looseness of this arrangement is unacceptable.

It then follows that if no really superior process to that proposed by Kerr can be found to slot into the initial stage of the process, then this Draft Report should be shelved. Ratification of such process would, in any event, have to be widely considered by the public, industry and government.

Additional tools to the heritage agreement

At present, the heritage agreement is one of a range of tools utilised in the conservation and interpretation process of heritage places. There are many situations out there in the heritage landscape that are not suited to reliance on a heritage agreement. To preclude those places from access to assistance has the potential to produce a serious gap in the fabric of Australia's heritage assets.

Let's widen the scope of conservation, not strangle it

By application of the provisions of the Draft Report, assistance to a much narrower range of places will be limited to those places with agreements in force. Thereby, there will be a consequent reduction in the array of resources available for conservation of the nation's heritage assets in the non governmental palette. And this is at a time when more resources, not less are needed to conserve our heritage. This is a serious concern.

Summing up

We need to ensure that more assistance is available to the widest and most diverse range of places of heritage significance. For that reason, the Draft Report needs to be completely re-thought with this objective in mind.

All government funded projects, not just those in the heritage field, are subject to defects outlined in the Draft Report. All agencies accept the obligation to carefully monitor expenditure to achieve the best results. To do otherwise is to betray the trust placed in us for an altruistic approach to heritage conservation. We don't need the problems proposed by this Draft Report by the Productivity Commission.