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City of Onkaparinga

From the Office of the Mayor

08 February 2006

Heritage Inquiry
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Sir/Madam

Productivity Commission Heritage Inquiry

At its meeting held on 7 February 2006, Council resolved to forward a submission to the Commonwealth Productivity Commission on the Conservation of Australia's Historic Heritage Places Draft Report stating strong opposition and concern with the directions and recommendations. It is likely that the recommendations, if implemented will have significant impacts on the City of Onkaparinga's resources and its ability to conserve its built heritage. Specifically, the City of Onkaparinga submits the following comments:

- A voluntary approach to Local Heritage listing is not supported as it will not safeguard the City's built heritage
- The proposed requirement for Local Governments to produce conservation management plans for its own heritage-listed properties is generally supported subject to an adequate period of time being allocated to prepare them along with sufficient funding and resourcing for both the preparation of the plans and the recommended restoration and maintenance works
- The proposed requirement for Local Government to document and publicly report on the heritage-related costs associated with the conservation of local government owned heritage-listed buildings is supported subject to the allocation of sufficient funding and resourcing to accord with the required reporting format
- Compulsory acquisition is not supported as a means of conserving the City's built heritage as it is financially unsustainable and forces local government to take the primary burden for the purchase, management and maintenance of heritage-listed buildings

- The proposal to allow private owners of already listed properties to apply for a negotiated voluntary 'Conservation Agreement', and for listing to continue only if an agreement is reached, is not supported as it would lead to the potential de-listing of hundreds of properties currently on the Local Heritage list regardless of their heritage value. This is an inappropriate way to manage and conserve the City's built heritage
- The triggering of a reassessment of existing heritage listing when a development application is lodged is not supported as it compels Council to negotiate a voluntary 'Conservation Agreement' with the landowner, even if both parties are satisfied with the status quo, and may lead to subsequent de-listing if the property has changed hands and a new agreement cannot be reached. This will significantly increase the timelines and resourcing associated with the development assessment process as well as undermine the conservation of the City's heritage buildings
- The proposed removal of any requirement to take heritage considerations into account in relation to any individual property outside a Heritage (Conservation) zone is not supported as it will remove all guidance for the assessment of the impact of new development on heritage places and will leave the majority of Local Heritage listed buildings with limited protection.

The City of Onkaparinga has invested heavily in the conservation of its built heritage, establishing an Advisory Service and Local Heritage Advisory Committee, offering a Heritage Fund and Award scheme, developing a comprehensive inventory of all local heritage places and detailed conservation plans for a selection of Council-owned buildings, and maintaining a built heritage website. There are over 500 State and Local Heritage listed buildings within the City of Onkaparinga with overwhelming landowner support for their properties to be heritage listed¹. As such, the City of Onkaparinga asks the Productivity Commission to carefully consider the impact of policy recommendations that will dismantle positive built heritage initiatives developed at local government level with the community's support.

Should you require further clarification on the City of Onkaparinga's position in relation to this matter, please do not hesitate to contact (08) 8384 0590.

Yours sincerely

Ray Gilbert, OAM JP

Mayor

¹ During landowner consultation with 330 property owners as part of the Local Heritage (Willunga) and (Noarlunga) Plan Amendment Report process in 2003/2004, only 30 formal objections were received to heritage listing.