



# Conservation Council of South Australia Inc

## Response to the Productivity Commission Issues Paper on the Conservation of Australia's Historic Places

### Submission by

The Conservation Council of South Australia Inc.  
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### Introduction

The Conservation Council of South Australia (CCSA) is South Australia's peak non-government community environment body. Formed in 1971, it is an umbrella organisation for around 55 of the State's diverse environment groups, who represent some 60,000 individuals.

CCSA is pleased to make a submission on Productivity Commission Issues Paper on the Conservation of Australia's Historic Places.

The Issues Paper examines contemporary heritage issues very thoroughly. While the CCSA and some of its member organisations have had considerable involvement on heritage matters in South Australia, we do not have the resources to respond fully to many of the questions contained in the paper, particularly those dealing with economic and management subjects. We will, therefore, respond in a general manner to the relevant topics raised within our expertise.

### Government involvement in historic heritage conservation

Governments enable the protection of heritage places through legislation under which the built heritage is identified and protected and penalties for infringements of conservation principles are enforced. Governments subsidise heritage conservation through grants and tax and rate rebates. Governments are also the owners of historic heritage places, many of which are the icons of communities, such as town halls, museums, galleries, office buildings, bridges, etc. These are often the best-preserved historic buildings in an area and set an example for the private sector. Governments are essential to the education of the public on the importance of heritage to our national, State and local identity. As noted by an English historian, 'the relationship between the conservation of the past and politics is ... strong, permanent, intimate and quite unavoidable'.

Governments should be guided by the principle that historic heritage places are essential to the identity of the nation and its communities, that the heritage features of those places

must not be compromised, that heritage buildings must retain their setting and that adjacent development must respect and complement the built form character of the heritage building. Heritage listing must not be voluntary or depend upon funding for conservation. If a place is identified as a heritage place by a professional organization or committee, then the building must be listed in a register. If the value of a building is reduced as a result of heritage listing, the owner should not expect compensation for the loss of value.

The public must be involved in the heritage processes, by nominating places for listing, by attending open meetings of a Heritage Council and by having the right to appeal against decisions or recommendations of the Council.

We are concerned that it is a purpose of this inquiry to seek ways in which governments may reduce their financial commitment to historic heritage conservation. We would oppose any move to reduce this commitment and suggest that it should instead be increased, as government grants for heritage conservation have never been adequate.

### **Identification of historic heritage places**

In South Australia surveys have been undertaken by staff of the Heritage Branch to identify the cultural heritage of this State, particularly in regional areas. In the metropolitan area, the government has relied on its professionals, on the lists of the National Trust (SA) and on nominations from the public. In the 1980s there was a tendency to list iconic buildings, mansions and other grand buildings, but gradually places of more modest architecture such as pubs, cottages and other buildings of historic significance were regarded as heritage worthy of listing. The community was ahead of governments in demanding an extension of the concept of heritage to include these sorts of buildings. The community also demanded protection for streetscapes and local heritage of importance to the character of an area. In 2005 more than a hundred buildings recognised as being of heritage significance in North Adelaide by professional consultants were not recommended to the Minister in a Development Plan because the owners objected to the heritage listing.

### **Current responsibilities for historic heritage conservation**

Demographic changes have affected older inner city neighbourhoods considerably. Governments have encouraged higher density living to avoid further urban sprawl, and the result has been disastrous as developers have purchased allotments with single family homes, demolished the building which often contributed to the character of the neighbourhood, and built two and three 'Tuscan' houses on each allotment. In the process, mature trees and established gardens have been lost, replacing leafy townscapes with a barren look. In the City of Adelaide, a policy of the council to increase the population of the city is resulting in many high-rise apartment buildings being constructed, some inappropriately placed adjacent to heritage buildings. We do not necessarily object to these demographic trends, but we believe local governments should be more restrictive with new developments.

Non-government organisations such as CCSA have contributed to the conservation of historic places by:

- Organising public demonstrations and petitions to prevent demolition of historic places
- Lobbying governments to protect heritage places

- Nominating places for listing on a heritage register
- Recommending policies for extended protection of historic places, such as historic zones and local heritage
- Participating in public consultation on legislation and policies
- Public education of heritage issues through media coverage
- Ownership and maintenance of heritage buildings (more than 100 in SA) by the National Trust (SA) – one of CCSA's member groups

NGOs are involved in heritage conservation as watchdogs on governments to ensure legislation is implemented appropriately. Volunteer workers are the mainstay of NGOs particularly as government funding is reduced.

Priorities for NGOs involved in heritage conservation are often set by government policy papers, such as this one, and by the urgency of the imminent demolition of a building which the NGO would wish to save.

Impediments to activities of volunteer organisations include lack of availability of volunteers who are employed or studying, as well as ageing of the volunteer community without their replacement by younger volunteers. The volunteer spirit and community involvement appears not to be pronounced among people in their 40s and younger as they focus on their living standards, and this is the major impediment to the continuation of some NGOs, particularly those which are dependent on membership fees and have no access to public funding.

### **Public Sector**

The recent legislative changes by the Australian Government have improved the administration of national lists because the Commonwealth Government now has the power to maintain the national heritage and to enforce sanctions for unapproved actions, whereas the RNE was only a list of prestige places which could not be protected by the Commonwealth. We have no evidence that these changes have improved the overall conservation of historic heritage places.

The protection of any building listed on a register depends upon the will of the government to enforce the proper implementation of the legislation. There are many examples in South Australia, particularly during the building boom of the 1980s, in which both State and local governments disregarded principles of heritage conservation in favour of new developments. The SA Government has also used its powers under s.46 of the *Development Act 1993* to approve major developments that would not comply with criteria in a Development Plan.

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