

## ZENY EDWARDS

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Heritage Inquiry  
Productivity Commission  
P O Box 80  
BELCONNEN ACT 2616

### Submission Re Draft Report on Conservation of Australia's Historic Heritage Places

The Productivity Commission Inquiry was held in response to a real need to address problems with the existing legislative framework of Conservation of Australia's Historic Heritage Places. I am now the wiser after reading the amount of information now available in the public domain because of the number of excellent submissions from a variety of sources. I was therefore very disappointed with the draft report and the recommendations of the Productivity Commission in that it negated the very purpose of its existence. The conservation policies of Australia's Historic Heritage Places need to be stepped up judiciously rather than diminished or abolished in the way that the Productivity Commission recommends.

Having attended the full hearing it became obviously clear that five issues were necessary to help solve the problem affecting the Conservation of Historic Places:

- Promote education and respect of historic places
- Establish a funding program for owners and custodians of heritage-listed properties
- Establish a consistency in the listing and assessment processes of historic places among expert bodies
- Develop an appreciation of historic places among the general public (grass roots level)
- Help local government improve
  - heritage policies and guidelines,
  - relations and liaisons with owners of heritage-listed properties and proposed heritage properties, and
  - the management of local heritage listings in a consistent and proactive manner.

There was a clear polarity between the 'for' and 'against' conservation in the submissions received by the Commission. The 'for' were represented by heritage institutions such as ICOMOS, ACNT and the NSW Heritage Office and private individuals like myself. The 'against' were represented by mostly private owners of heritage properties who are against perceived implications of such listings. Mr John Boyd, (No.8, 166, 189) particularly, was among those who made an impact with the Commissioners. It was a surprise to note such importance given to Mr Boyd's statements, in contradiction to the extensively researched and studied recommendations made by the Heritage Office, ICOMOS and the National Trust. Mr Boyd gave me the impression that he thought that he was being victimised by the heritage institutions and would be financially disadvantaged if his house were to be listed.

Because the Commission gave Mr Boyd's submissions such importance, I am compelled to reply to it. Mr Boyd's submission contained errors. There are eight, not six, Pettit and Sevitt houses in Richmond Avenue. Six are listed, and Mr Boyd's house at 400 Mona Vale Road (or 15A

Richmond Avenue) is one of the two not listed. The other (No.27) was refused demolition by the L&E Court because of its heritage significance within the group. It has just been purchased by a young family who are quite happy for the property to be listed and are benefitting from the advice and help of the NSW Heritage Office with plans for extensions to the house. The eight are in a group in their original landscape setting, not individually separated, and make up a cohesive and intact streetscape. It is their rarity as a group that makes them significant. Mr Boyd concedes this distinction in his latest submission (DR196) when he states that they do not represent the majority of housing in the 1960s. They were an attempt to improve the standard of project housing in New South Wales. As a model of architect-designed affordable housing they were a unique concept in Australia and proved very popular to first home buyers. The Pettit and Sevitt group of houses were, as Mr Boyd states (DR196), overwhelmingly influential in the development of project housing in Sydney in the 1960s and 1970s.

The loss of \$120,000 on the value of Mr Boyd's property is perhaps one quote from a real estate developer who was eager to get his custom. A proper real estate valuation may come up with a completely different figure. His further arguments in his latest submission (DR196) mainly elaborating on his monetary loss are hypothetical. Mr Boyd has used every opportunity and every available avenue to air his grievances. But may I say that for every Mr Boyd there are a number of other owners who are proud to have their properties heritage-listed. Unfortunately they were not motivated to make a submission to the Productivity Commission. Ms Marie Rampling, at 29 Richmond Avenue and part of the group of Pettit and Sevitt homes, bought the house before it was listed and was very happy for it to be listed. She is proud of her home and has opened it for inspection by the Historic Houses Trust. Other owners of the Pettit and Sevitt houses in the group bought their houses knowing that they were heritage-listed and now do not want to be involved in Mr Boyd's active campaign against heritage listing. Another owner of a Pettit and Sevitt house at 59 Richmond Avenue, Ms Trixie Whitmore, is actively supporting the heritage listing and is campaigning for the whole group to be recognised.

Mr Boyd's property was nominated for heritage listing as early as thirty years ago and was rejected because of erroneous information. It was thought Mr Boyd's house was not part of the group as it was not designed by the same architect of the other houses, but it has since been confirmed by original architect Ken Woolley that he also designed Mr Boyd's house. These latest nominations are nothing new. Mr Boyd's property, as part of the group of Pettit and Sevitt houses, is significant. This is the unanimous opinion of the NSW Heritage Office, the Land and Environment Court, the RAI, DOCOMOMO, the National Trust and the Twentieth Century Heritage Society and other individual experts. Mr Boyd's opinion about the heritage significance of his property and the disadvantages of its heritage listing based on monetary loss, restrictions to work on his house and difficulty in selling it are emotive and not wholly accurate. The truth of the matter is Mr Boyd cannot be swayed despite assurances from heritage experts such as conservation architect, Ms Meredith Walker who was doing her utmost best on the last day of the Inquiry to convince Mr Boyd that heritage listing will not reduce the value of his property and an offer from Council to help him draw up his renovation plans. Mr Boyd is entitled to his opinion but the Commission should accept it and subject it to objective and rigorous comparison with expert opinion and factual information.

When Mr Boyd sells his property as he has intimated, the likely scenario is that a developer will buy the property, and being on Mona Vale Road, he will want to demolish it and put in a DA for a SEPP 5 medium-density development. The affected residents of the other Pettit and Sevitt houses and other neighbouring residents will then claim loss of value of their properties as a result of this development. The heritage significance of the Pettit and Sevitt group may be one of

the major arguments in the L&E Court that may be able to stop such a development from happening.

Owners of heritage properties need to be convinced that heritage listing is a privilege rather than a burden. There is certainly a feeling (of pride) amongst owners of National Trust properties and heritage-listed properties in Australia, England and elsewhere. To enable this change in attitude to become more positive, there is a need for government and heritage institutions to develop an education and promotion program regarding heritage and the meaning of listings so that owners understand the purpose and value of such listings. For example, that a heritage listing prevents any work on the building to be carried out by the present owner is a popular misconception that needs to be corrected. Government needs to establish a funding assistance program for owners of heritage properties to allow them to implement works according to imposed standards (e.g. rebates on rates, restoration grants for materials that the owner could otherwise not afford, access to professional advice and practical help from craftsmen).

Contrary to the Inquiry's opinion, the listing process by the National Trust (in NSW where I am involved) is not an ad hoc, flimsy or 'indiscriminate' process (Boyd, DR 196). Having been the past Chair of the Historic Buildings Committee of the National Trust, I have first hand knowledge of the listing process. The item to be considered for heritage listing is assessed on purely heritage values. This ensures objectivity and clarity of focus rather than 'unbridled enthusiasm' as the draft report suggests. Items nominated for listing are nominated for their heritage significance. However nomination does not guarantee listing and the item may be rejected after the initial assessment. If accepted a classification report is prepared based on extensive research by committee members serving on an honorary basis. It undergoes debate and discussion at the committee meeting. The members are all well qualified in their different fields of expertise. The classification report may be vetted by other committees such as the Parks and Gardens Committee or referred to an expert in a particular field. When approved the final draft is submitted to the Conservation Committee where it undergoes further discussion. The Conservation Committee may refer the report back to the Historic Buildings Committee before being finalised. When approved the final draft of the Classification Report then goes to the Board for final discussion and official approval. This is the reason why Mr Boyd should not 'wonder that half of Sydney has not already been heritage listed!' (DR196)

The National Trust and other heritage groups play a crucial role in preserving the historical value of the natural and built environment of Australia in the long term not just in a short term. Their responsibility to conserve historic heritage places goes beyond the tenure of Mr Boyd of his home. In this context the value of the recommendations towards the Conservation of Australia's Historic Heritage Places is immeasurable when viewed in the context of a relatively young Australian architectural history.

It is also for this reason, citing Richmond Avenue, Haberfield and Braidwood as ideal examples, that I advocated the gazettal of Urban Conservation Areas as heritage precincts. My first submission (No.11) states this very clearly. I am therefore so disappointed about Draft Recommendation 9.8 and request that this recommendation:

*State and Territory governments should remove the identification and management of heritage, zones, precincts or similar areas from their heritage conservation legislation and regulation, leaving these matters to local government planning schemes.*

Should be revised to:

*State and Territory governments should strengthen the identification and management of heritage zones, precincts or similar areas within their heritage conservation legislation and regulation, and support local government planning schemes in these designated areas.*

Heritage is a dynamic process, which necessitates upgrading the assessment process progressively through the years and subjecting it to continual review. The recommendations of this Productivity Commission are crucial to the dynamism of this assessment process. To abolish the mechanisms that are now in place is to denigrate the years of study that have been devoted by expert bodies into developing current heritage policies and guidelines. 'Conservation' should be the absolute focus of the whole argument. The problem is not 'conservation of historic heritage places' but its equitable, consistent and wise implementation of its policies and guidelines to ensure its further success.

In the present Draft Report, vital issues are misinterpreted and the proposed recommendations guarantee failure of the whole system of conservation.

Australian architect William Hardy Wilson (1881-1955) was the pioneer of the movement to conserve historic places in Australia. He was, during his time, the foremost architectural activist and agitator and I defer to him to have the last word:

In all probability there are not existing in New South Wales more than a dozen buildings built before 1830 that should be guarded carefully from disfigurement or destruction. If they are allowed to pass beyond restoration to their original design we shall lose the foundation of architecture in Australia. From the early work we learn what was done in the beginning; what changes were made to suit the climate, what wood and brick and stone has best withstood decay. And we learn how we have progressed and how we have gone astray. Upon these buildings of ours, which are the stepping-stones to greater styles, can be founded better work than that which is being introduced in Chicago or English garden suburbs. Without them we have no familiar past on which to build. And when an architect needs to refresh his memory with the sight of work well done or to renew his feeling for scale, symmetry and proportion, he goes to the buildings where in craftsmanship of an early day he finds a standard higher than his own. And these old buildings hold the memory of Pioneers better than the books in our libraries or the pictures on our walls. Maybe we have not learnt to appreciate their beauty and their usefulness, but love for them is dawning. And it is certain that students will go to them that they may learn. Already they are doing this, for there is no better way.

William Hardy Wilson, Introduction to his exhibition of architectural drawings,  
Anthony Hordern's Gallery, 1919

Zeny Edwards  
Architectural Historian