

Scanned copy of original submission

Heritage Inquiry  
Productivity Commission  
PO Box 80  
Belconnen ACT 2616

8 February 2006

Dear Sir/Madam

**Re: Conservation of Australia's Historic Heritage Places  
Draft Report**

I refer to the above Report and on behalf of the Glebe Point Residents Group (GPRG) make the following submission.

**Rec.8.1 Strongly Object**

*Privately owned properties should be included on a national, State, Territory, or local government statutory heritage list only after a negotiated conservation agreement has been entered into and should remain listed only while an agreement is in force.*

The Report states that a conservation agreement would include some element of funding. Further it states that 'a system of agreements to purchase "additional " levels of heritage conservation from private owners will involve administrative costs and will not be without potential problems'.

The report does not address subjectivity in decision making, power bases at local government level, developer pressure and the disinterest of many private owners in heritage buildings. The introduction of such agreements in place of existing legislative requirements would inevitably result in loss of the Country's built heritage and this would be particularly significant in boom periods when the development value is high.

Conservation agreements as part of a package of measures to encourage the protection of heritage will only work whilst the existing system of statutory heritage listing and heritage planning controls remain in place.

This recommendation draws on the attractiveness of community funding for additional costs associated with heritage listing and relies on community interest, knowledge, perception and willingness to achieve appropriate heritage outcomes. Unfortunately retention of a proper balance and mix of protected historic heritage places will not be achieved if this type of process is allowed to dictate heritage protection.

The report is silent on the ability of Government at all three levels to meet the community funding envisaged in this recommendation.

#### **Rec. 9.4 Supported with Comment**

*State governments should put in place systems for their local governments to request compulsory acquisition in cases where this becomes the only way to ensure cost effective conservation of places of local significance.*

Whilst the report states that compulsory acquisition would be an action 'of last resort' and would need to rely on State powers, the question of available funds is as usual a major deterrent to any such action. As the consideration of such action would in all likelihood relate to larger privately owned properties, funding would not be inconsiderable. The second question to be asked here is what would become of the properties? Whilst noting that the report canvases some options, compulsory acquisition could result in well meaning local governments being left with a portfolio of acquired properties to manage and sustain.

#### **Rec.9.7 Strongly Object**

*State and Territory governments should modify their planning legislation and regulations to remove any requirement to take heritage considerations into account in relation to any individual property other than those requirements relating to zoned heritage areas.*

The proposal to remove heritage considerations from planning controls would be a retrograde step and would take protection of heritage back to the 1960s.

#### **Recs. 7.4 and 7.5 Supported**

The above recommendations which relate to data bases and management systems which would enhance reporting, transparency and public accountability are needed in managing heritage listings.

Susan Cleary  
Clair, GPRG

[susiecleary\(a~o  
zemail.com.au](mailto:susiecleary@ozemail.com.au)