

PARKVILLE ASSOCIATION INC.

Box 54, Parkville, 3052

Tuesday, February 14, 2006

**To Heritage Inquiry
The Australian Productivity Commission
PO Box 80
Belconnen ACT 2616**

Subject: Submission and Comments on the Draft Report Entitled Conservation of Australia's Historic Heritage Places.

Dear Sir or Madam,

The Parkville Association makes the following comments in reference to the draft report referred to in the subject of this letter:

The Parkville Association and its Contribution to Heritage Issues

The Parkville Association was formed in 1967 with a prime objective of preserving the fabric and amenity of this uniquely intact example of Australia's architectural and social history of the gold rush and post gold rush era. At that stage the Royal Melbourne Hospital was planning to demolish a large tract of South Parkville and build a car park. The fact that this now nationally recognized historic precinct still exists is almost entirely due to the work of the Association in conjunction with State and Local Government and such national agencies as the National Trust of Australia.

The association continues to engage with Governments at all levels as joint custodians of this precinct and has a long and recognised history of thoughtful and articulate contribution to heritage. It speaks with substantial experience and expertise on heritage issues and operating within the legislative and regulatory framework.

Parkville's national significance

Parkville is not just Victorian buildings and streetscapes, it is an encapsulation of the social history and heritage, and the story of development of the city and the nation.

Parkville has outstanding national heritage value, as an integral component of Governor La Trobe's intentions for Melbourne during the gold rush era as a city encircled by parks and punctuated by impressive boulevards. It is defined by its relationship to the 1850's parklands reserve (from which it was extracted and from which it derives its name); the major approaches to the city from the north and northwest (again determined in the early 1850s); and in the case of South Parkville, the market reserves which gave strong rural overtones to its otherwise characteristic urban development. Royal Park constitutes the majority of Parkville and two of Melbourne's grand boulevards, Flemington Road and Royal Parade define its boundaries.

It would not be an overstatement to say that Parkville is an important national historical treasure representing life in the heyday of Australia's gold rush and post gold rush period. Parkville houses, built by the commerce from the live animal market serving the goldfields, range from simple cottages to large houses. Their early inhabitants range from back yard boot factories to merchants, from dairies with the cows grazing on Royal Park to blacksmiths. In Parkville its "intactness" is one of its most important features; it cannot just be considered on a building by building basis. Its position on the roads to Sydney, to the goldfields, to the western district and its proximity to the City, the university, the zoo and the first showgrounds, bring the whole history of a critical social and economic period in Australia alive.

The Association's general position on the Productivity Commission's Draft Recommendations.

1. The Parkville Association does not accept that the Australian Government should be removed from its share in the responsibility for heritage matters and in particular 'phasing out the Register of the National Estate' (draft recommendation 7.1 and 7.2). There is a need for Australian, State and Local Government to not only to have a commitment to preservation of heritage buildings, streetscapes, places and precincts but for that commitment to be seen, understood and honored at all levels and departments of Government and Local Government. If the Australian Government withdrew from joint responsibility and custodianship for preservation of heritage areas and places of national social architectural and economic significance the implication would be that there is nothing of national significance. This would weaken the national resolve to sustain important tangible assets of our history and add to the ever present risk of incremental loss of these assets.

Irreplaceable heritage can be lost in minutes and meaningful mechanisms need to be in place to act appropriately. There is an analogy here with the Governments' approach to health and safety being promoted "as everyone's business". Heritage is everyone's business too.

2. "Built historic heritage" (Draft Report p v "Background" line 9) cannot be treated solely on a building by building basis. Heritage issues need to deal with the importance of visual perspectives of streetscapes and lanescapes which form an essential feel for and insight into social and economic history. Heritage areas, historic streetscapes and precincts present different issues, problems and solutions from a single notable place or building such as Como or Buda. The draft does not appear to recognise the importance of this vital component (see p 42 "Criteria). "Place" should have been defined to include streetscapes, precincts eg the gardens surrounding the Melbourne Exhibition building and the precinct of South Parkville.

3. It is important to face strategically, the difficult and contentious issues which often involve competing interests and commercial considerations. More often than not it is the commercial development interests that have the financial resources and partisan interests to put undue pressure on State and Local Government bureaucrats, planners and regulators to accept applications for destroying historical assets. Local communities generally have not the resources, the expertise or the organization to effectively prosecute the case for preservation. The custodianship of history is the role of all levels of Governments. Standing firm to preserve real tangible links with the past through streetscapes, precincts, places, landscapes, remnant vegetation etc as well as buildings, is the "hard stuff" to handle but that is why we need all levels of Government to be involved. It is the hard stuff of heritage which illuminates the rest and once it is lost, it is lost forever.

4. Economic analysis of cost/benefit, efficiency and effectiveness in treatment of heritage areas and places is problematic in that, unlike the flow of goods and services, heritage cannot be replaced once it has gone. Small incremental actions, however efficient or worthy in themselves, can and do irreparably destroy the value of important tangible evidence of Australia's history. Often in our view there is a high level of ignorance over what should be valued in a heritage place or precinct. Thus an approach to heritage involving negotiations of 'conservation agreements' in terms of current commercial interests are fraught with questions of relevance to the real and often intangible issue of long term value and preservation. This approach does not provide an incentive to learn and appreciate why a 'Place' or feature should be preserved. It is also difficult to see what would motivate a private party to sign such an agreement.

5. The Association, from detailed and long experience, very strongly disagrees with draft recommendation 9.8. Heritage is a partnership between Australian, State and Local Governments as stated in 3 above. Local Government planning is notoriously weak, short term and subject to partisan influence. Local Government should not therefore be left as the sole custodian, judge, regulator or manager of local heritage zones, precincts or similar areas.

Summary of the Parkville Association's position

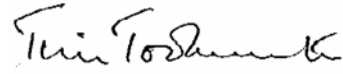
1. The broad collation of information in the draft on stakeholder positions in Australia's Heritage is useful. However the conclusions and recommendations appear superficial and disappointing and do little to tackle the essential encouragement of the effective preservation of our Heritage and its insights into Australia's history. This is not achieved by collating lists, by conservation agreements with private parties nor by the Australian Government reducing its role.
2. The Association considers that the role, active custodianship and involvement of all levels of Government, including the Australian Government is critical to be maintained and to be seen, honored and understood.

3. Incentivisation in preserving Heritage is achieved more by celebration, public recognition, education and communication than by increasing regulation or making lists. This should be clear from the Table 2.1 p 15. The comment immediately following this table does not seem to indicate an understanding of the results of this on-line survey. More thought should be given to recommendations covering mechanisms for positive encouragement and example. It is becoming increasingly recognised that individual households compete to equal or better their neighbours. This is a real factor that should be tapped. The Association speaks from real experience here.
4. The Parkville Association does not agree with the thrust of the recommendations of the Draft Report, in particular recommendation 7.1, 7.2, 7.3, 9.1, 9.2, 9.3, 9.6, 9.7 and 9.8. There does not appear to be a real understanding of the increasing rarity of Heritage and of the increasing importance of the perceptions and the psychology inherent in private and public decisions to preserve Australia's Heritage places. The performance of all levels of Governments in the preservation of historic places, precincts and zones will not, in our view, be improved by these recommendations.

We would welcome the opportunity to present and discuss these views privately or publicly with the Commission.

Yours Sincerely,

Tim Todhunter



President Parkville Association.