



# *Shire of York*

*Submission to the Productivity Commission*

*Draft Report*

*Conservation of Australia's Historic Heritage Places*

## *Overview*

The overview contained in the Draft Report quite correctly identifies specific issues impacting on heritage places and their preservation with the most important being the lack of cost information on public buildings at the state & local government levels and the inability to measure the significance of the cultural values.

The selection of places to be included in any register or listing must be through a more rigorous and critical process than currently in use.

The use of negotiated agreements prior to listing is fully supported as it removes antagonistic attitudes from the process.

It is vitally important that the degree of significance is clearly stated and quantified to ensure that real, current and future costs are recorded.

An extremely important section of the overview is contained on page xxxv – Heritage Conservation Agreements & Planning Regulation. Heritage considerations should be separated from planning decisions for properties not affected by agreements or listings.

The section on Heritage Areas is considered contentious in that it does not address how the boundaries would be identified and maintained for a nominated or designated heritage area or zone. Non heritage properties and places can have inappropriate or irrelevant development controls placed on them.

The section on Implementation Issues does not address capacity issues even though this is critically important in view of the statistics in table 1 on page xxiii.

The sheer number of places on local government lists indicates a massive task for local government in an area competing for scarce financial & professional resources.

The conclusions reached are valid and are fully supported.

## *Findings*

Draft Finding 3.1 – This finding is valid and pertinent to heritage conservation. What is missing from the finding is comment on location and comparisons of quality where there are multiple similar places.

Draft Finding 5.6 – It is acknowledged and accepted that there is significant scope to improve the management of heritage conservation by local governments, but at what cost? When heritage is competing with roads, recreation, health & other services it does not receive a high priority.

Draft Finding 6.2 –The true costs of heritage places must be identified in an open and accountable manner to ensure that scarce funds are allocated for the greatest long-term sustainable benefit.

Draft Finding 7.5 – This finding goes to the hub of heritage conservation as prescriptive legislation and bureaucratic processes result in antagonism and emotional conflict.

Draft Finding 7.6 – This finding is a complete statement of the current position and unless there is significant change the conservation and enhancement of heritage places will suffer.

Draft Finding 7.7 – Unless appropriate and relevant financial assistance is provided for heritage properties they will be lost. Current grants, rebates and subsidies do not address the problem and taxation incentives may be more beneficial if targeted at high cultural value heritage places.

Draft Finding 7.8 – This is a true picture of the current situation, which will only get worse without clear and concise federal and state government legislation and support.

The local government election cycle of every 2 years can see the Council priorities change dramatically with heritage only occasionally gaining a high priority.

Draft Finding 8.1 - Fully supported.

## *Recommendations*

The Key Recommendations (Draft 8.1) is fully supported and endorsed.

Draft Recommendation 7.4 - Fully supported  
Draft Recommendation 7.5 - Fully supported  
Draft Recommendation 9.2 - Fully supported  
Draft Recommendation 9.3 - Fully supported  
Draft Recommendation 9.4 - Fully supported  
Draft Recommendation 9.5 - Fully supported  
Draft Recommendation 9.7 - Fully supported  
Draft Recommendation 9.8 - Fully supported

The Shire of York acknowledges the role of the Productivity Commission in the research and preparation of the Draft Report and contends that the Findings & Recommendations should be implemented as a practical means of preserving the Historic Heritage Places of Australia.

Ray Hooper  
Chief Executive Officer

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