

Scanned copy of original submission

Heritage Inquiry  
Productivity Commission  
PO Box 80  
Belconnen ACT 2616

Dear Commissioners,

## GARDEN HISTORY

Overall, I must express our concern about the conclusions of the Productivity Commission Draft Report, Conservation of Australia's Historic Heritage Places. The major concern is the overriding argument that the rights of the individual property owner are of principal importance. This has led to the conclusion that there should be a reliance on negotiated agreements ( Draft Recommendation 8.1).

This proposal would create a system where those owners least sympathetic and who pose the most risk for heritage properties would be able to exercise their will to demolish or neglect properties with no legal `stick' to prevent them from doing so. Such owners are the very reason why State and local governments and organisations such as the National Trust and ours have worked toward identifying and ensuring places are listed - to have some legal instrument to use when necessary. Negotiation has always played a part in the management of heritage places but the legal framework that the current listing process provides is the only way to ensure the retention of the heritage item in critical cases.

The second concern is the lack of attention given to the subject of education and training that was included in our submission and a number of others. This is related to the funding of tertiary education. Currently tertiary institutions appear to have had to restrict their more specialised or niche subjects so that they can stay within funding requirements. Although not strictly the focus of this Productivity Commission, the funding of tertiary education and training is related to the subject of this commission, and indeed the productivity of the Australian nation as a whole.

Additional aspects of concern of the draft report are:

- There is no quantification of the costs of heritage property maintenance that are claimed in submissions,
- There is no quantification of the benefits of listing and conservation,
- It lacks an in-depth examination of solutions that do not involve dismantling the current system or causing unsustainable expense on the public purse.
- There is no examination of making assistance with expertise and technical solutions for property owners more accessible,

- There is no examination and assessment of financial incentives through rate and tax rebates, direct grant or low interest loans, seed funding, amendments to insurance regulation, or cost sharing by the community and private owners of listed places
- A serious flaw in the argument about balancing costs and benefits is that the cost/benefit analysis is never explicitly set out -Figure 6.1 is far too general. As this is an inquiry that is partly driven by Treasury one would expect to see it in the final report.
- The serious issue that is raised by many of the submissions to the inquiry regarding adequate public funding for heritage, is hardly addressed outside of the ideology of deregulation and voluntary conservation agreements. The report notes the declining public sector budgets for historic heritage conservation (p.19) but makes no recommendations to improve the current inadequacy of heritage funding.
- In the discussion of tourism benefits of heritage, the report fails to recognise the important contribution made by historic places. Heritage is an attractor to both local investment (seeing areas as attractive to rent, buy or work in) and economic activity (visiting 'pretty and interesting places', for domestic, interstate and international visitors). Job creation through cultural tourism in security, guiding, administration, conservation works, suppliers and service is directly linked to the 'attraction' which is very often heritage, and often a heritage garden for example Centennial Park, Sydney; Royal Botanic Gardens Adelaide. The key issue in heritage-focused tourism is that a reasonable percentage of profit should be returned to the maintenance, conservation and improvement of the heritage places that generate the tourism in the first place.

As it stands the report will provide negligible benefit to heritage conservation in Australia. In following a line for deregulation, the draft report fails to define a cohesive and coordinated approach to the more efficient use of available funding and the development of better incentives for conservation, alongside the existing regulatory frameworks which have served our heritage well for over 30 years.

In conclusion we find the Draft Report disappointing, to say the least, and sincerely hope that the report will be comprehensively rewritten as a supportive document for our heritage.

Yours faithfully,

Colleen Morris  
National Chair

Australian Garden History Society

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