

Our Reference	LJM: GF/3.3.2/3 (141385)
File Name	Coulet Historic Heritage Conservation
Your Reference	Productivity Commission Inquiry
Date	7 March 2006
Contact Officer	Leith McEvoy

Scanned copy of original submission

Neil Byron  
Commissioner Productivity  
Commission PO Box 80  
BELCONNEN ACT 2616

Dear Commissioner Byron,

Re: **HISTORIC HERITAGE CONSERVATION -  
PRODUCTIVITY COMMISSION INQUIRY**

Reference is made to the Australian Government Productivity Commission Inquiry into Historic Heritage Conservation.

Please be advised that the Wattle Range Council has considered the Inquiry, and in doing so has resolved the following:

- (1) Council does not support the Productivity Commission's key recommendation, namely that:-  
*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.*
- (2) Council is concerned that in essence, the key recommendation is proposing a voluntary listing system, which will tend to serve private interests at the likely expense of inter-generational equity and community benefit, and which is contrary to the direction that heritage conservation legislation is heading in South Australia.
- (3) Council is also concerned that such a proposal would also have significant implications on Council workloads and resources.
- (4) Council is of the opinion that should this key recommendation be supported and implemented, then significant financial assistance (i.e. Grants, low interest loans, etc) would need to be offered and available to the owners of heritage places on the list, in order for them to want their properties initially placed on the list, and then for them to be kept on the list. Where such financial assistance is made available to the owner of a heritage place on the list, then the property should be required to remain on the list. This arrangement would need to be a clear requirement of any conservation agreement.

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- (5) Council is also concerned with the following recommendation, which appears to remove heritage considerations over individual heritage properties, unless they are situated in zoned heritage areas:

*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.*

At the present time there are many individual heritage properties not situated in zoned heritage areas, and they probably never will be because there are few if any other heritage places within the immediate area. These individual heritage properties should still have an appropriate level of heritage protection. Council would seek further clarification about the interpretation of this recommendation.

Council hopes that these comments are of some assistance with the Inquiry.

Should you wish to discuss this matter further, and/or require any additional information or details, please do not hesitate to contact me.

Yours sincerely,

Leith McEvoy  
**GENERAL MANAGER - OPERATIONS**