

**REVIEW OF THE SUBMISSIONS
MADE TO THE PRODUCTIVITY
COMMISSION INQUIRY INTO
AUSTRALIA'S HISTORIC
HERITAGE**

**SECTION II: SUMMARY OF ISSUES AND
ACTIONS IN SUBMISSIONS**

February 2007

**The Heritage Chairs and Officials of the
States and Territories of Australia**

SECTION II: Summary of Issues Raised and Actions Suggested in Public Submissions by Stakeholder Category

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
1 Commonwealth, including the AHC 6 Agencies 11 Submissions	52, DR328	Department of Defence	Procedural	Procedural
	85	Collections Council of Australia Inc	50% Key challenge for management of public heritage sites is sustaining balance between access, use & conservation	Strengthening the COAG agreed national strategic framework through inter-governmental collaboration to:
	118, 186 & DR258	Australian Heritage Council	50% Pressures from regulatory, institutional requirements under EPBC Act	<ul style="list-style-type: none"> • better integrate 'heritage' responsibilities in policy & legislation • close legislative gaps in protection of the historic environment • ensure adoption of common standards for conservation practice • report consistently in nationally coordinated SoE reporting system
	124	Old Parliament House	<ul style="list-style-type: none"> • Impact of size, diversity of organisation's heritage portfolio • Lack of financial assistance or cost recovery to offset heritage estate management • Costly reporting requirements 	<ul style="list-style-type: none"> • complete AHPI incorporating RNE data providing database inventory of Australia's heritage places accessible to all through its web links
	153	National Capitol Authority	<ul style="list-style-type: none"> • Requirement for specialist staff, external expertise to meet assessment, CMP development and management responsibilities • Development of policy and supporting tools, including manuals 	<ul style="list-style-type: none"> • improve access to expert advice and assistance, through provision of heritage advisers at local government level
154, 183, DR304	Department of the Environment and Heritage	33% Challenges communicating and delivering on new national heritage system	<ul style="list-style-type: none"> • Using public nominations process to build comprehensive credible NHL- quickly • Community nomination to CHL or NHL distract from core heritage assessment • Need for strategic thematic research program to underpin nominations 	<ul style="list-style-type: none"> • address shortage of skills in heritage conservation • improve consistency in assessment and CMPs • develop manuals that explain heritage criteria and thresholds • coordinate public engagement programs nationally • develop education curricula incorporating appreciation & understanding of heritage, and conservation training programs • promote heritage tourism more effectively • disseminate guidelines and ideas re adaptive re-use more effectively
			33% Specific administrative issues with DEH re EPBC Act	Improved inter governmental coordination in building the NHL
			<ul style="list-style-type: none"> • Determination re possible adverse impact a new, significant agency responsibility • Delays, costs with lack of specific timeframes during commenting process • Role of Burra Charter needs clarification – not statutory, yet often referenced 	<ul style="list-style-type: none"> • Strategic program of thematic research • Utilisation of skilled staff and expertise • Program of community education and engagement
			33% Need to agree a national strategic policy framework in collaboration with S/T governments through the EPHC	Improvement to EPBC administration
			<ul style="list-style-type: none"> • Development, implementation of a balanced suite of policy tools 	<ul style="list-style-type: none"> • Statutory timeframes, supported by resources within DEH • Development of necessary guidelines, explanatory memoranda
			33% Need to integrate all aspects of heritage at all levels of governments in legislation and policy	
			<ul style="list-style-type: none"> • Heritage not regarded and managed holistically in all jurisdictions 	
			33% Need to improve national policy framework to ensure consistency and 'best practice' in all jurisdictions	
			<ul style="list-style-type: none"> • Need to close legislative gaps in protection of historic environment • Need to lift standards for conservation work • Need to develop common standards for assessment • Need to address duplication and gaps in heritage lists 	

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			<p>16% Difficulties finding viable re-use within core business and operations</p> <ul style="list-style-type: none"> Heritage assets not fit for contemporary purposes due to OH&S, BCA requirements <p>16% Integral value of collections to place not incorporated into policy framework</p> <ul style="list-style-type: none"> Collections essential to assessment, interpretation, education Difficulties re use of heritage buildings as collection repositories 	
			<p>Financial</p> <p>50% Limited availability of data and analytic tools to assist decision-makers to determine priorities for assistance</p> <ul style="list-style-type: none"> Need for heritage research program providing comparative studies Need for framework for consistent annual reporting on historic heritage assets <p>50% Need for capacity building programs so National Heritage List places can exemplify best practice in planning, management and presentation to the public</p> <p>33% Need to address market failure occurring in provision of heritage services</p> <p>33% Need for clear definition of financial responsibilities between governments</p> <ul style="list-style-type: none"> No cost shifting between jurisdictions <p>33% Funding for cultural heritage far less than for conservation of natural resources.</p> <ul style="list-style-type: none"> <i>Natural Heritage Trust Act</i> excludes historic heritage from being considered – despite indivisible nature of heritage values expressed in one place Australian government heritage grant programs heavily oversubscribed <p>16% Importance of collections to heritage places not supported through funding</p>	<p>Financial</p> <p>Implementation of integrated national heritage strategy for cooperative action on funding for historic heritage:</p> <ul style="list-style-type: none"> balanced suite of incentives to support heritage conservation improved economic sustainability of heritage places funding similar to NHT for communities, local governments shared programs to assist disadvantaged regional places <p>Program funding to support conservation and interpretation of collections associated with heritage places:</p> <ul style="list-style-type: none"> to improve conservation, storage, security, and interpretation of places and their collections to provide training and support for interpretation and education program development and delivery
			<p>Draft report recommendations</p> <p>Not supported</p>	

Category	Submissions		Issues (and %)	Identified needs/actions
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2 S/T heritage agencies, including the HCOANZ 5 organisations 11 submissions	59 & DR390 139 & 187 & DR271 147 & DR267 178 & DR242 & DR385 Heritage Council of Victoria DR378	Heritage Council of WA COAG HCOANZ ACT Heritage Council Queensland Heritage Council	<p>Procedural</p> <p>100% HCANZ have identified two issues as most critical to improving historic heritage conservation in Australia:</p> <ul style="list-style-type: none"> the need to improve the policy framework for historic heritage; and the need for enhanced and new incentives (economic instruments) to support historic heritage conservation <p>100% Problems caused by reliance on heritage listing without sufficient support from complementary policy instruments:</p> <ul style="list-style-type: none"> lists not comprehensive uncertainty for property owners and potential purchasers; public confusion re numerous lists, what listing entails or means; encourages negative public perceptions of impact of listing; failure to ensure comprehensive audit of heritage places; lack of effective public education programs. <p>90% Absence of national leadership</p> <ul style="list-style-type: none"> No evidence that AHC or DEH will continue former AHC national leadership role Failure to develop national guidelines for assessment and CMP development Community confusion over duplicated Commonwealth and S/T lists, eg RNE Concern re Commonwealth management of <i>EPBC Act</i> administration National Heritage regime left gaps in identification and protection (eg, ACT) <p>90% Informational Asymmetry</p> <p>Persistent myths adversely effect community's understanding of heritage listing:</p> <ul style="list-style-type: none"> curtailment of owners' ability to alter or renovate; adverse impact on private property values. <p>80% Contemporary pressures adversely affecting heritage conservation</p> <ul style="list-style-type: none"> Urban redevelopment pressures affecting heritage character of older suburbs Population shifts, losses or gains Abandonment of rural structures, public building redundancy Loss of cultural landscapes through changing rural land use patterns Declining public sector budgets <p>75% Inconsistency in heritage management across local governments</p> <ul style="list-style-type: none"> Need for standardised sets of guidelines and terminology Deficiencies in conservation knowledge & practical conservation 	<p>Procedural</p> <p>Heritage Chairs recognise need to reinvigorate the 1997 COAG agreement for an integrated National Heritage Framework</p> <p>Including specific policy agreements encompassing issues such as (but not excluded to):</p> <ul style="list-style-type: none"> need for nationally agreed listing criteria and thresholds for all three levels of government jurisdictions to ensure national consistency; nationally agreed development guidelines to increase consistency of decision making on the management of heritage places; nationally agreed measurable for state of environment reporting on historic heritage that can be used by all levels of government. <p>Listing needs to be complemented by a suite of policy instruments</p> <ul style="list-style-type: none"> Tailored to the particular market failures that exist. <p>Improved town planning practices that promote historic heritage conservation by:</p> <ul style="list-style-type: none"> reducing disincentives to conservation in form of incompatible zonings; and making imaginative use of planning incentives <ul style="list-style-type: none"> Heritage integral part of comprehensive planning process, rather than adjunct. Inclusion of historic heritage conservation as integral element of sustainability policies or strategies Provision of effective network of specialist heritage advisory services Priority to information, promotion and awareness activities Research programs targeted at gaps to increase comprehensiveness of listings

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			<p>75% Poor management of redundancy of government assets</p> <ul style="list-style-type: none"> • Tension between service delivery, maintenance of heritage elements • Community critical of government's poor stewardship <p>60% Issues arising as heritage conservation not integral to planning</p> <ul style="list-style-type: none"> • Planning schemes sometimes incompatible with conservation goals <p>45% gaps in registers, including:</p> <ul style="list-style-type: none"> • typological - eg, cultural landscapes • thematic – eg, multi-cultural heritage, post-war architecture, industrial places • geographic gaps evident in rural areas • future challenges in identification of potential heritage places <p>20% Comprehensive heritage survey present difficulties</p> <ul style="list-style-type: none"> • Aboriginal places not always visible above ground • Values of historic places will continue to be recognised over time • Comparative assessment is required but data limited • No research funding under new national heritage system <p>20% Holistic management difficult - disparate philosophies, separated administrative systems</p>	

Category	Submissions		Issues (and %)	Identified needs/actions
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			<p><i>Financial</i></p> <p>100% Market Failure present in historic heritage conservation</p> <p>100% Disparity in natural vis a vis cultural funding</p> <ul style="list-style-type: none"> • Little capacity for long term investment in cultural heritage conservation • Inadequate funding to support comprehensive, equitable heritage system <p>100% Over reliance on regulation, creates dysfunctional system</p> <ul style="list-style-type: none"> • State-based heritage grant schemes oversubscribed by ratios 7:1 to 12:1 • Local Government grants/subsidies inadequate • Governments have not invested in incentives, see <i>Making Heritage Happen</i> <p>20% lack of tax deductibility disincentive to private philanthropy</p> <ul style="list-style-type: none"> • Impacts on churches, public institutions <p>20% Sustainable management requires long term planning & funding</p> <ul style="list-style-type: none"> • Most grant funding short term, not recurrent, • Not able to be utilised for routine maintenance 	<p>Financial</p> <p>Establishment of sustainable comprehensive historic heritage incentives program as identified in <i>Making Heritage Happen</i>:</p> <ul style="list-style-type: none"> • tax deductions for donations to approved funds • tax concessions for owners that enter into Heritage Agreements • tax rebates for qualifying private expenditure • Land Tax remissions • local government rate rebates • grants & loan subsidies; and • revaluation provisions for listed places, based on NSW, Vic models <p>Other National Measures should include:</p> <ul style="list-style-type: none"> • establishment of special funding sources <ul style="list-style-type: none"> – to supplement consolidated revenue appropriations (eg, share of lotteries or gaming revenue); or – share of Land Tax (or another suitable tax). • establishment of Revolving Funds for acquisition, restoration, disposal-under covenant of heritage places • <i>National Tourism and Heritage Taskforce</i> should investigate research findings of Allens Consulting work re lack of recognition of relationship between cultural heritage and tourism • EPHC/HCOANZ should implement recommendations identified in <i>Going Places</i> without delay • mechanisms for measuring the effectiveness of financial incentive schemes should be researched <p>Extension of tax deductibility to churches, other organizations</p> <ul style="list-style-type: none"> • DGR status to include heritage funds and NFP organisations • Permit exemptions for works to heritage places should be developed <p>Program provision for long term maintenance of heritage places</p> <ul style="list-style-type: none"> • Investment of % of grant to provide interest for maintenance • Provision of incentives in return for maintenance, such as land tax relief, rates rebates
			<p><i>Draft report recommendations</i></p> <p>Key recommendation not supported</p>	

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3	19	Museum of Victoria	Procedural	Procedural
S/T governments and other agencies	39	Lotteries Commission of Western Australia Trading as Lottery West	65% Demographic, social pressures affect retaining, sustaining heritage places	Integrated national heritage policy as agreed by COAG to:
15 Agencies	80	Western Australia Museum	<ul style="list-style-type: none"> Adaptive reuse costly, over regulated Information asymmetry - unsubstantiated myths re heritage listing Changing government priorities – environmental issues, market pressures 	<ul style="list-style-type: none"> identify clear national heritage criteria standards and guidelines; provide predictable, systematic and transparent system; define roles of owners, governments, commercial interests and community; agree ways to ensure governments commit to being exemplary stewards of their own properties; foster skills development, especially through the TAFE system; acknowledge and support need for conservation of collections associated with heritage places; more closely align heritage management with sustainability principles
20 Submissions	98	Western Australian Planning Commission	50% Lack of skills, availability of professional expertise	
	136	Tasmanian Government	<ul style="list-style-type: none"> Majority of advisers of architectural background – limiting Only remaining conservation courses at masters level, not trades skills level Major challenges with conservation of new materials, construction techniques Approaching retirement of generation of conservators 	
	140	Artlab Australia		
	149	Tourism Council Tasmania		
	157 & 188 & DR384	NSW Heritage Office	45% Redundancy of historic heritage	Improve heritage outcomes within the planning system through:
	164 & DR418	Government of South Australia	<ul style="list-style-type: none"> Particular issue for churches, declining congregations, increasing costs Redundant industrial heritage difficult to re-use – contamination, retention of plant 	<ul style="list-style-type: none"> better integration of heritage with planning; encouragement of innovative design; ensuring planning decisions based on explicit rules, governing how competing values are weighed up to deliver outcomes; better alignment with sustainability approaches; more active support, advice, education, information for owners; new provisions for minimum maintenance of heritage places; clarification re blurring local heritage with amenity, character issues; requiring risk management strategies to include disaster preparedness.
	175	Interim Namadgi Advisory Board	40% Lack of overarching policy framework limiting efficiency	Development of policy framework to support successful tourism
	184 & DR413	Victorian Government	<ul style="list-style-type: none"> Commonwealth withdrawal from national leadership Gaps in existing protection framework Duplication, disconnection across tiers of government Separate management of cultural and natural heritage artificial, distorting 	<ul style="list-style-type: none"> Increased focus on end user – tourism operator Strategies to increase visitor numbers Programs to assist National Trust to better present properties Better balance required between infrastructure – transport, hospitality needs – and conservation requirements
	192	Northern Territory Government	40% Difficulties balancing appropriate conservation, meaningful interpretation, good visitor management to achieve successful tourism outcomes	Education and public programs required to underpin community appreciation of heritage
	DR195 & DR416	Queensland Government	<ul style="list-style-type: none"> Tourism market saturated with poorly presented sites (eg, Tas Trust properties) Over regulation impedes meeting of contemporary hospitality standards Skill sets/focus of tourism & heritage managers divergent 	Program of national heritage research required providing ready access to comparative data, to specialised studies related to emerging fields of evaluation of social, cultural capital
	DR411	NT Tourism	35% Lack of integrated planning, listing results in confusion, duplication	
	DR414	SA Tourism	<ul style="list-style-type: none"> 'Heritage' merges with 'character', 'amenity', 'townscape' 	
			30% Lack of contextual, comparative studies to support high quality assessment	
			20% Conceptual issues re 'heritage' create uncertainty,	
			<ul style="list-style-type: none"> Degree of significance always lies in continuum Assessment of significance does not imply or suggest actions required Difficulties establishing priorities for heritage assessment/management 	

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			<p><i>Financial</i></p> <p>75% Limited incentives for owners major restriction to good conservation outcomes</p> <ul style="list-style-type: none"> • Need for philosophic shift to supporting needs and expectations of owners • Particular incentives needed to encourage adaptive reuse <p>50% Subsidiarity model not properly resourced – cost shifting occurring</p> <ul style="list-style-type: none"> • Australian government providing less funding • World Heritage places need greater Commonwealth support • Massive disparity between natural and cultural funding <p>50% High costs of heritage materials, maintenance, labour, compliance</p> <ul style="list-style-type: none"> • Need for professional advice adds to costs • Insurance, OH&S, disabled access, fire rating compliance • Difficulties overlaying modern standards on heritage fabric – for IT, temperature control, customer service areas etc <p>35% Local government insufficiently resourced to ensure owner, community support for heritage conservation</p> <p>35% Tourism operators operating at margins of profitability:</p> <ul style="list-style-type: none"> • bearing disproportionate costs conserving heritage sites; • small visitor numbers providing low income streams; • World Heritage sites not maximising advantage of listing <p>30% Local government has limited capacity to support conservation, to:</p> <ul style="list-style-type: none"> • manage municipal surveys • secure and provide professional expertise and advice • fund community heritage projects and programs • provide speedy protection in emergency <p>25% Difficulties for community organisations accessing grant funding</p> <ul style="list-style-type: none"> • highly competitive, onerous process of application, compliance • conservation grants dependant on CMP, expensive to undertake 	<p><i>Financial</i></p> <p>Strategic investment needed in the heritage assets that underpin heritage tourism</p> <ul style="list-style-type: none"> • Commonwealth heritage loan scheme at a national level to attract economies of scale <p>New grants program to increase professionalism of small community museums to:</p> <ul style="list-style-type: none"> • provide training for development of business skills; • extend <i>Sharing Australian Stories</i> to encourage destination linkage through shared stories; • extend GVEHO grants to allow smaller organisations to apply; • provide funds for development of tourism infrastructure <p>Tailored suite of tools needed for optimal conservation outcomes</p> <ul style="list-style-type: none"> • Adoption of tools used in natural heritage management • Heritage conservation tax offset – TIHC revised, cf, US tax incentives • Conservation covenant concessions – expanded to include cultural places • Extension of DGR status to churches and other NFP organisations • Establishment of heritage places foundation utilising DGR status • Municipal rates rebate (eg, Mornington) • Reduction in land tax liability (as in Vic) • 'Extension of Hands on Heritage' programs
			<p>Draft report recommendations</p> <p>Not supported</p>	

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	No.	Authors		
4	5	Hay Shire Council	Procedural	Procedural
Local Government	12	Broken Hill City Council		
	18 & DR357	City of Melbourne	70% Heritage not core business but consumes significance resources	Development of national heritage policy framework establishing partnerships across governments to:
75 agencies	27	City of Ryde	<ul style="list-style-type: none"> 'Heritage' subjective, labour intensive Assessment, conservation, management require professional expertise 	<ul style="list-style-type: none"> initiate review of Commonwealth, S/T legislation to minimise duplication, maximise consistency; recognise importance of local government assessment and management of heritage; delineate, streamline roles, responsibilities of each level of government; formalise agreed national heritage assessment procedures; create 'common standards' and guidance documents; establish common policy frameworks for heritage conservation; ensure professional heritage advice availability at local level; provide consistency, uniformity of policies, thresholds and significance assessments; ensure Aboriginal heritage incorporated into mainstream; incorporate sustainability principles into heritage legislation; ensure RNE places are assessed for statutory protection.
89 Submissions	42	Gold Coast City Council	50% Need for common and transparent policy frameworks and thresholds	
	43 & DR305	Town of Vincent	<ul style="list-style-type: none"> Inconsistent compliance provisions and standards Uncertainty as to weight of heritage significance in planning decisions Lack of clear criteria for determining what constitutes 'heritage' Lack of clarification around Municipal Heritage Inventories and their purpose 	
	48	Randwick City Council		
	57 & DR193	Shire of York		
	62 & DR240	City of Port Phillip		
	66 & DR367			
		Municipal Association of Victoria		
	67 & DR341	City of Perth	50% Practical conservation issues impeding best practice heritage	
	70 & DR352 & DR407	Hobart City Council	<ul style="list-style-type: none"> Scarcity of original materials, trades skills shortage Difficulties accessing professional expertise Significant liability issues along with BCA and disability access requirements Additional consent requirements eg professional advice, research 	
	71	Southern Midlands Council		
	73 & DR380	WA Local Government Association		
	74 & DR325	Strathfield Council		
	75 & DR236	City of Mitcham		
	78 & DR396	City of Newcastle	45% Need for comprehensive community education regarding value of heritage	
	81	City of Stonnington	<ul style="list-style-type: none"> Fragmented support for research priorities and policy innovations Insufficient resourcing to record and document changes over time Lack of resources to support local archival and history projects 	
	96	Banyule City Council		
	100	City of Ballarat		
	101	City of Maribynong		
	103 & DR408	Maitland City Council	45% Need to address public concern over possible implications of listing	
	115 & DR314	Adelaide City Council	<ul style="list-style-type: none"> Imposition of burdensome application, reporting and conservation processes Perception that once place listed, it cannot be renovated or modified. Concerns re property rights, and lowering of property values Difficulties ensuring owners acknowledge and accept responsibilities Demolition by dereliction threat to the long term retention of the built heritage 	
	143	City of Sydney		
	176	Hornsby Shire Council		
	177	City of Casey		
	179	Local Government Association of NSW & Shires Association of NSW		
	DR231	Baw Baw Shire Council	35% Local governments lack heritage expertise	
	DR234	Bass Coast Shire Council	<ul style="list-style-type: none"> Expense, confusion created by time taken to develop/revise Control Plan Difficulties providing/revising statements of significance & CMPs Lack of national network of heritage advisory support 	
	DR251	City of Okaparinga		
	DR254	ALGA		
	DR263	City of West Torrens		
	DR266	Indigo Shire Council		
	DR270	City of Canada Bay Council	30% Difficulties striking balance between protection & reuse	
	DR273	City of Glen Eira	<ul style="list-style-type: none"> Need for ways to encourage sympathetic renovation/restoration of heritage Heritage constraints sometimes too restrictive of commercial uses Need to regularly revise CMPs for adaptive reuse proposals 	
	DR275	City of Nedlands		
	DR277	City of Norwood Payneham,		

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	St Peters		<ul style="list-style-type: none"> Restrictions on demolitions and potential changes to building fabric 	<ul style="list-style-type: none"> <i>National strategy to assess and list places of heritage value</i> <ul style="list-style-type: none"> Nationally coordinated comprehensive survey Agreed consistent criteria re condition, conservation needs Mandatory heritage reporting in all SoE National heritage website, a 'one-stop' shop for heritage information & advice providing access to national studies and images: <ul style="list-style-type: none"> electronic recording of places and collections; register of historic heritage places with rating of significance & level of assistance to be provided by all governments; consolidation of heritage lists to single database (AHP I); website/database development assistance for councils; <p>cf, NSW Heritage Office online heritage inventory software & State Library of NSW program recording public library local history collections - first audit of local history collections</p> <p>Regional initiatives to increase local capacity, efficiency:</p> <ul style="list-style-type: none"> establish regional networks, eg, Hunter Heritage Network; locate Commonwealth officers in regional areas; prepare regional heritage management plans, cf Coastcare program stronger regional networks could support joint research programs, eg, Flanders Project; shared heritage officers program, eg, Qld Museum network of Museum Development Officers; Regional Heritage Councils could be established (funded at state/federal level) to: <ul style="list-style-type: none"> manage and administer local lists – arbitrate on complex issues provide independent professional advice oversee local nominations, removals, demolition of places <p>Initiatives to support trades training and provision of expertise</p> <ul style="list-style-type: none"> Establishment of National Heritage Advisory Scheme:- on-line information clearinghouse National review of heritage education and traditional skills training Establishment of National Heritage Trades Skill Centre Establishment of 'hands-on heritage' program, like Green Corp, linked to Heritage Trades Skills program Access to specialist tertiary training for practitioners online Inclusion of traditional construction in basic trades training Specialist post-trade courses and programs should be developed
	DR284	City of Moreland	<p>30% Capital city development pressures extreme</p> <ul style="list-style-type: none"> Difficulties balancing community expectations – anger from both sides of heritage spectrum 	
	DR293	City of Holdfast Bay		
	DR297	Toowoomba City Council		
	DR301	Goulburn Mulwaree Council	<p>25% Public confusion about roles, responsibilities of levels of government</p> <ul style="list-style-type: none"> Duplication of legislation, planning, heritage lists, administrative systems unwieldy and unworkable 	
	DR310	Manly Council		
	DR318	Armidale Dumaresq Council		
	DR319	Adelaide Hills Council		
	DR320	City of Monash		
	DR324	Mosman Municipal Council		
	DR332	Ipswich City Council		
	DR335	City of Port Adelaide Enfield	<p>20% Separation of historic, Indigenous and natural heritage administration impedes holistic solutions</p> <ul style="list-style-type: none"> Insufficient identification, protection of Aboriginal heritage 	
	DR337	Blacktown City Council		
	DR342	Whitehorse City Council	<p>20% Public sector poor managers of heritage - poor role models for community</p> <ul style="list-style-type: none"> Funding of maintenance /operation of sites in regional areas major issue 	
	DR346	City of Yarra		
	DR347	Warringah Council	<p>15% Landscapes, settings, curtilages not respected and protected</p>	
	DR349	Corporation of Town of Walkerville		
	DR351	Kuringai Council	<p>10% Forced reliance on volunteers lacking time, skills & professional expertise</p> <ul style="list-style-type: none"> Small population base ,reliance on older citizens 	
	DR354	Barossa Council		
	DR356	Pittwater Council	<ul style="list-style-type: none"> Threat of burn out and/or revolution Community heritage groups often fragmented, unguided, unrecognized 	
	DR360	Western Sydney Regional Organisation of Councils		
	DR365	City of Burnside	<p>5% Most problematic situation is private ownership and public uses, eg, churches of strong local significance affected by change of use</p>	
	DR371	Campbelltown City Council		
	DR375	Woolahra Council		
	DR377	Pine Rivers Shire Council		
	DR379	Parramatta City Council		
	DR382	Local Government Association of SA		
	DR386	Mornington Peninsula Shire Council		
	DR388	Bayside City Council		
	DR389	City of Fremantle		
	DR391	Manningham City Council		
	DR393	Willoughby City Council		
	DR394	Hunters Hill Council		
	DR396	Newcastle City Council		
	DR404	City of Prospect		
	DR406	City of Booroondara		
	DR409	Wattle Range Council		
	DR412	City of Subiaco		

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	DR415	City of Unley		<ul style="list-style-type: none"> • Tertiary courses - architecture, building and engineering - should include components on traditional construction and heritage <p>Initiatives to improve heritage management at local level:</p> <ul style="list-style-type: none"> • integration of heritage approval and planning processes – ‘one application – one permit’; • criteria and assessment processes should be reviewed and standardised; • provision of resources to owners at a local level - free professional advice, explicit design guides, grants, awards for heritage restoration • development of Statement of Planning Policy for Cultural Heritage Conservation; • template Local Planning for Heritage – tool for Local Government for implementing local planning strategy; • integration of heritage in the planning approvals process; • development of set of national guidelines for conservation management plans. <p>Greater recognition of and support for work of NGOs</p> <ul style="list-style-type: none"> • Provision of volunteer training and support programs • Support for Australia ICOMOS publications and community education programs • Work of heritage conservation volunteers should be recognized and celebrated

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	No.	Authors		
			<p><i>Financial</i></p> <p>85% Main pressure on historic heritage places is limited funding, resources & incentives</p> <ul style="list-style-type: none"> • More applications for funding than funding available • Higher insurance premiums for owners & builders • Inadequate funding for infrastructure and servicing of local heritage places • Unreliable nature of grant funding makes effective long term planning impossible • Significant cost of subterranean heritage and archaeological investigations • Councils face different transaction costs for heritage based on their size and scale <p>80% Too many regulatory “sticks” and not enough incentive “carrots”</p> <ul style="list-style-type: none"> • Little obvious incentive for owners to conserve places • Financial incentives too small to provide adequate protection • Anomalies between tax benefits applicable to commercial and private owners • No clear, accessible model for assessing costs and benefits of conserva <p>75% cost shifting from the highest tiers of government to the lowest</p> <ul style="list-style-type: none"> • Increasing pressure on Local Government from devolving of responsibilities • Limitations of Local Government to raise revenue • Role underplayed and under funded • Local government least resourced, but with largest number of heritage places • Heritage Council under resourced, limited grants to allocate across state • Inadequate capacity to employ heritage advisers 	<p><i>Financial</i></p> <p>Commonwealth should establish a Cultural Heritage Trust, cf Natural Heritage Trust to:</p> <ul style="list-style-type: none"> – mobilise existing community effort under a regional structure; – enhance on-ground outcomes; – identify research and listing priorities on a regional basis <p>Commonwealth and State national framework agreement to:</p> <ul style="list-style-type: none"> • ensure local agencies sufficiently resourced to implement and enforce their legislation; • allocate funding for effective network of regionally based heritage advisory services; • develop national funding model for Local Government heritage responsibilities; • review national applicability of UK heritage lottery & WA Lottery Commission models; • consider ways to utilise tax regime to encourage triple bottom reporting to encourage heritage conservation; • examine private cost/public benefit issues; • implement incentives discussed in <i>Making Heritage Happen</i>; • ensure funding is provided for NHL places in local areas. <p>Commonwealth/State partnership to improve range of concessions available to support heritage conservation</p> <ul style="list-style-type: none"> • Increase range of organisations able to receive tax deductible donations • Introduction of ability for approved heritage organisations to receive property on tax beneficial basis • Re-introduction of tax rebate scheme for heritage conservation projects • Amendment of tax laws providing consistency between environmental and cultural organizations • Review allocation of tax revenue • Reintroduction taxation incentives to stimulate private investment • Land rates or taxes should be structured to reflect conservation use of a property <p>Local Government funded to provide local incentive package:</p> <ul style="list-style-type: none"> • transfer and bonus plot ratio; • rebate system – similar to the Pensioner Rate Rebates scheme; • discretion to waive planning fees;

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
				<ul style="list-style-type: none"> • establishment of revolving fund, heritage restorative funds; • guarantee of equal insurance costs for insurance for heritage places; • government partnerships for private provision of labour, materials, expertise, finance; • financial or transferable development rights to sensitively adapt rather than demolish buildings; • reduction in land value for tax purposes for private owners; • accelerated depreciation should encourage continued investment; • tax capture/rebate system enabling community wide support for private owners; • loan schemes such as the WA Heritage Loan Scheme & WA Local Government Grants Commission – Heritage Allowance <p>Tourism promotion strategies and funding initiatives:</p> <ul style="list-style-type: none"> • to facilitate markets; • attract people and investment; • aid in economic diversification in regional areas.
			<p>Draft report recommendations</p> <p>3 strongly supportive</p>	

Category	Submissions		Issues (and %)	Identified needs/actions	
	No.	Authors			
5	14	Engineering Heritage NSW	<i>Procedural</i>	<i>Procedural</i>	
Professional heritage groups 9 Organisations 12 Submissions	29	Engineering Heritage Tasmania	<p>90% Heritage expertise and conservation skills shortage</p> <ul style="list-style-type: none"> Lack of heritage expertise in DEH, heritage agencies,, Local Government Lack of advisers, archaeologists, engineering expertise at local government level Insufficient and poorly targeted skills development and training Heritage advisers spread unevenly, too thinly across local government areas <p>80% Dearth of consistent accessible data re heritage places</p> <ul style="list-style-type: none"> Lack of contextual, thematic studies impedes effective assessment Lack of agreed data collection standards Inconsistency re SoE reporting systems nationwide APHI incomplete – must incorporate RNE data Need for heritage research program Need to ensure NEGP & other studies publicly accessible Lack of data re status & condition of engineering heritage <p>70% Lack of comprehensive national heritage policy, and need for:</p> <ul style="list-style-type: none"> national inventory of heritage places; consistent national standards in regulation of heritage conservation; integration of heritage in planning, economic and environmental policy; agreement to consider heritage holistically. <p>70% Failure of Commonwealth leadership to support national heritage conservation through lack of commitment to and support for:</p> <ul style="list-style-type: none"> national framework for heritage research; practical heritage conservation initiatives; leadership in the public debate about heritage issues; national approach to archaeology and maritime heritage; independence of AHC, (constrained by inadequate resources); provision of resourcing for Historic Shipwrecks Program; national standards for 'best practice ' heritage management <p>40% Concerns re structure and effectiveness of national heritage system</p> <ul style="list-style-type: none"> Reduced community participation in EPBC through complexity of processes Protection not effective because reliant on assessment of potential impact of action Conservation management at landscape/precinct scale, extremely difficult <p>33% Lack of Commonwealth support for historic archaeology</p> <p>33% Lack of Commonwealth support for marine archaeology</p>	<p>Commonwealth should adopt leadership role, and through HCOANZ develop a comprehensive, national policy framework to:</p> <ul style="list-style-type: none"> clarify roles, better resource heritage agencies and local government; develop 'best practice' model approach to relationship between heritage and planning; conduct national review of opportunities for community access to heritage sites, interpretation and education resources; recognise Indigenous culture as integral to Australian culture; better support Australian international heritage activities. <p>Governments should construct a supportive intellectual framework for national heritage conservation</p> <ul style="list-style-type: none"> Continued development of Australian Heritage Bibliography Australian Heritage Places Inventory to include all reputable heritage lists, including those from NGOs Sample heritage surveys for SoE based on standardised data <p>Australian Heritage Council should be resourced to play broad leadership role envisaged</p> <ul style="list-style-type: none"> best available national experts appointed to the AHC <p>Best practice implementation of national heritage system</p> <ul style="list-style-type: none"> Potential conservation costs should not be included in listing criteria EPBC regulations should be brought into line with <i>Burra Charter</i> DEH should simplify guidance for management plans All values should be considered in management of place RNE not dismantled until all S/T places assessed , and data secured Strategy to guide NHL listing of national heritage sites to complement community -based nominations Publication of community information resources to 'translate' NHL criteria into sub-sets of tangible themes, including DEH themed studies and Australian Natural Heritage Assessment Database <p>National review of professional and trades training</p> <ul style="list-style-type: none"> Development of national skills training program Commitment to inclusion of engineering expertise in heritage assessment & management teams <p>Greater Commonwealth support for marine archaeology</p> <ul style="list-style-type: none"> Ratify <i>Convention for the Protection of Underwater Cultural Heritage</i> Amend <i>Commonwealth Historic Shipwrecks Act 1976</i> to incorporate all forms of physical cultural heritage located in Australian waters 	
	46	The EPBC Unit			
	93	Engineering Heritage Australia			
		122, DR255, DR295			
		Australia ICOMOS			
		126 & DR338			NCHF
		138			
		Australasian Institute for Marine Archaeology			
		DR330			
		The Australasian Society for Historical Archaeology			
		DR395			
		Hunter Professional Network			

SECTION II: SUMMARY OF ISSUES AND ACTIONS IN SUBMISSIONS

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
			<p>33% Conservation and adaptive re-use of engineering heritage impeded by:</p> <ul style="list-style-type: none"> • failure to utilise engineering expertise in assessment & management; • lack of ongoing use resulting in cessation of maintenance and rapid deterioration; • extra costs of safety regulations, insurance premiums impede volunteer support; • under representation of engineering heritage on registers; • poor government stewardship of assets (frequently engineering heritage). 	<p>Commonwealth support for historic archaeology including:</p> <ul style="list-style-type: none"> • establishment central management system for archaeological relics • blanket protection for historical archaeological places with 50-year rolling date • adoption of Victorian <i>archaeological artefact conservation agreement system</i> <p>National Cultural Heritage Tourism Development Program</p> <ul style="list-style-type: none"> • Innovative tourism, eg, virtual tours & program of self guided tours • National support program to upskill volunteers, tourist operators
			<p>Financial</p> <p>85% Inadequate resources & incentives to support heritage conservation</p> <ul style="list-style-type: none"> • Funding lacking for research, public education, publication programs <p>80% Dramatically low levels of funding and technical support for cultural as compared to natural heritage</p> <ul style="list-style-type: none"> • Grants for natural heritage research cannot be accessed for historic heritage • Cultural NGOs ineligible for gift tax deductibility (except for National Trusts)- differs from environment and arts NGOs • Inadequate support for NGOs, volunteer training <p>60% inadequate support for Australian international heritage activities</p> <p>60% Poor resourcing for implementation of national heritage system</p>	<p>Financial</p> <p>The Australian Government should develop generous grants and incentives program to support heritage conservation nationwide to:</p> <ul style="list-style-type: none"> • provide redress for issues affecting owners of heritage property ; • allow cultural heritage NGOs to attract tax deductible donations ; • restructure land rates, taxes to reflect conservation costs, use of heritage property ; • provide suite of conservation support measures for the historic environment similar to those for natural environment, including 'Heritage Care' Program ; • enable agencies to invest in and maintain 'in house' expertise; • allow heritage property acquisition and conservation. <p>Programs to enable NGOs to better maintain, interpret and present their properties</p> <p>Commonwealth to increase funding to Historic Shipwrecks Program</p>
			<p>Draft report recommendations</p> <p>No support</p>	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
6	24	CFMEU	Procedural	Procedural
Professional non-heritage groups	49	Australian Academy of the Humanities	60% Lack of research program to underpin heritage assessment and management <ul style="list-style-type: none"> Need for case based research studies 	Consistency of legislation, administration, professional practice <ul style="list-style-type: none"> RNE places assessed for inclusion on other statutory lists Government commitment to best-practice stewardship
	68, DR392	Royal Australian Institute of Architects		
11 organisations	94	History Council of NSW	55% Value of historic significance in heritage assessment, conservation and interpretation not recognized <ul style="list-style-type: none"> Greater emphasis needed on intangible (including social values) assessment 	Broadening of heritage professional practice to include historians: <ul style="list-style-type: none"> government program for collecting, maintaining and disseminating relevant data series on Australia's historic heritage places; strategy to guide listing of National Heritage sites to complement community nominations.
14 Submissions	95	Museums Australia		
	107	Cultural Heritage Centre for Asia and Pacific	55% Shortage of Conservation & Heritage Trade Skills <ul style="list-style-type: none"> Fewer opportunities and incentives to undertake traditional skills training Lack of professional training for conservation architects, no system of accreditation 	Governments & partners to initiate <i>New Vision - Focus on heritage of the future - RAI A proposal:</i> <ul style="list-style-type: none"> adaptive re-use placed at forefront of national heritage policy encouragement of innovative design through consideration of holistic urban context conservation response appropriate to level of significance program of case-studies research National Development Guidelines for Heritage Properties a 'how to' guide for best practice design in heritage adaptation showcase models for innovation & successful adaptive re-use encourage reliance on performance based guidelines rather than prescriptive measures establish heritage gateway with access to publications and tools including specialist consultant and trade listings mandatory assessment of environmental sustainability whole area conservation controls rather than single sites
	117 & DR299	Environmental Defender's Office (SA)		
	132, DR279	The Planning Institute of Australia	40% New national heritage system is failing expectations <ul style="list-style-type: none"> Diminished role for the AHC Lack of Commonwealth leadership, lowering of national standards and principles Myriad of heritage systems and guidelines confusing 	National Heritage Trade Skills Development Program <ul style="list-style-type: none"> Professional Heritage Accreditation programs Enhanced apprenticeship schemes Small business startup allowances and award schemes Development of register of skilled tradespersons Inclusion of qualified engineers in heritage conservation teams Mandatory use of accredited practitioners for publicly funded work
	DR261	The Professional Historians Association (SA) Inc		
	DR306	Professional Historians' Association (NSW)	33% Need for improved interface between heritage & planning <ul style="list-style-type: none"> Inconsistent compliance provisions and standards Uncertainty as to weight of heritage significance in planning decisions Imposition of burdensome application, reporting and conservation processes 	
	DR410	Real Estate Institute of South Australia		
			25% Lack of coordinated policy to encourage good adaptive re-use <ul style="list-style-type: none"> Governments not supporting Good Urban Design Principles Rigid observance of uniformity, facadism, mimicry of heritage forms Prescriptive approach precludes innovation, creativity 20c heritage undervalued, under severe threat Need to ensure heritage management linked to sustainability principles 	
			25% Redevelopment pressures adversely affecting conservation of heritage <ul style="list-style-type: none"> Maximised value of property through increased unit occupancy of the land Loss of setting for heritage buildings 	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
			<p><i>Financial</i></p> <p>65% Commonwealth cost shifting without commensurate funding</p> <ul style="list-style-type: none"> Inadequacy of funding to maintain, restore, manage and protect historic heritage places <p>60% Owners bear costs, community benefits</p> <ul style="list-style-type: none"> Owners asset rich and income poor Little financial assistance to help owners cover extra conservation costs Lack of creative incentives High cost of trades skills, rare materials, management & maintenance Economic, social benefits hard to quantify <p>33% Land value distorted by unrealistic development opportunities/</p> <p>33% Lack of funding and support for community museums</p> <p>20% Failure to capitalise on cultural tourism as economic driver</p> <p>10% Lack of education and training programs for volunteers</p> <hr/> <p><i>Draft report recommendations</i></p> <p>No support for key recommendation</p>	<p><i>Financial</i></p> <p>Establishment of National Heritage Fund</p> <ul style="list-style-type: none"> Financial support for owners' conservation costs <p>Innovative package of tax & other incentives</p> <ul style="list-style-type: none"> Film industry model – benefits applicable when money needed most Pilot incentive programs to test effect of variety of incentives Land tax exemptions should be available for heritage places Accelerated depreciation, amortisation for listed investment properties 'In kind' financial incentives to mitigate initial development costs Trade-offs such as parking reduction, gross floor area limitation GST and rate relief for heritage properties conservation Corporate responsibility rewards Funding for Conservation Management Plans Support to transition properties to an appropriate adaptive re-use

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
7 Property industry groups 4 Organisations 5 Submissions	83	Urban Development Institute of Australia (WA)	Procedural 100% Public confusion and uncertainty re differing roles in heritage management	Procedural More efficient reliable heritage regulation required
	116	Urban Development Institute of Australia	<ul style="list-style-type: none"> Lack of consistency across local authorities Local listing subjective, reliant on consultants who often disagree Public use heritage as a means of preventing development Limited public understanding of listing and development assessment processes Limited understanding of impact of heritage listing on property 	<ul style="list-style-type: none"> Streamlined & more cost effective approvals process Preparation of model conditions for development on heritage sites Statutory timeframes must be agreed and met Publication & compliance with procedural fairness guidelines Preparation of state wide criteria and assessment guidelines Development of comprehensive programs of community information
	134, DR340	Property Owners Council of Victoria	<ul style="list-style-type: none"> Limited public understanding of listing and development assessment processes Limited understanding of impact of heritage listing on property 	<ul style="list-style-type: none"> Publication & compliance with procedural fairness guidelines Preparation of state wide criteria and assessment guidelines Development of comprehensive programs of community information
	165	WA Division of the Property Council of Australia	75% Imposition of heritage controls is confiscation of private property without compensation <ul style="list-style-type: none"> Heritage listing seen to have negative effect on property rights Public benefit must be identified prior to any heritage listing If community seeks to preserve heritage, community must be prepared to pay No provisions to compensate owners for loss of rights through listing Powers to list must be restricted to state or federal government 75% Heritage agencies perceived as prescriptive, anti-developer <ul style="list-style-type: none"> Under resourced and under funded Heritage decision making not transparent or timely Staff often inexperienced and quality of decisions poor 	Evaluation of role and resourcing of Heritage Council is required <ul style="list-style-type: none"> Heritage staff should be experienced and consider commercial factors in decisions Heritage Councils should include representatives with commercial experience Heritage agencies must have power to reject spurious applications for listing Developers should utilise heritage advice in preparation of development applications/ Use of voluntary conservation agreements should be considered
			Financial	Financial
			100% Owner should not bear conservation costs <ul style="list-style-type: none"> Rates and land tax are double taxation on listed property Incentives difficult to access Impact of listing negative over life cycle of property 	Cost based compensation must be paid to owners <ul style="list-style-type: none"> Funded incentive and compensation package should be integral to heritage legislation Package to include grants, loans, tax breaks, plot ratio and density bonuses Imposition of 'compensation options'– tradeable, transferable development rights Conservation covenants could provide flexibility to owners re conservation Taxes on listed properties should be reduced
			Draft report recommendations	
			All Supportive	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
8	1	Matthew D'Arcy	Procedural	Procedural
Private property owners (of heritage listed property)	3	Ms Margit Stocker	70% Owners feel loss of control of heritage listed places	Governments should recognise 'duty of care' to assist owners
	8, 166, 189, DR196, DR373	Janet and John Boyd		
35 Owners	9	Mr Albert James Morris	65% Property rights ignored/violated	Decisions should be transparent, based on clear process
45 Submissions	15, DR213	Mrs J Maling		
	87, DR344	Mrs Heather Berry	40% Public confusion re government, agency responsibilities	Creative conservation ideas which should be tried
	97	Vincent Sammut		
	109	Ian Pausacker	35% Heritage agencies appear to cast owner as 'enemy'	Trades skills development program needed
	123	RE and WK Mews		
	145	Ms Mona Winter-Irving	15 % Other heritage issues	All governments should share heritage responsibilities
	150	John and Ona Winter-Irving		
	167	John Alexander	15 % Other heritage issues	All governments should share heritage responsibilities
	171, DR366	Mr Vincent Crow OAM		
	181	Mr James Reid		
	DR199 & DR229	Cr Garry Green JP		
	DR202	Ms Diane Anderson		
	DR211	Peter and Jenny Casley		
	DR214	Mr Saman Rahmani		
	DR215	Mr Don Brew		
	DR228	Ms Trixie Whitmore		
	DR244	Dr Vanda Rounsefell		
	DR247	Mrs Christine Herner		
	DR258	Mr Lou Parke		
	DR265	Mr Ted Anderson		
	DR280	Mr Deepak Haikerwai		
	DR282	Mr Graham Cranswick-Smith		
	DR290	Ms Evonne Moore		
	DR312	Mr Andrew Mitchell and Mr Philip Chapman		

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
	DR317	Ms Maria Rajendran		
	DR322	Ms Judy Jack and Mr Fred Schmidt		
	DR323	Mrs Judy Leong Shook Yin		
	DR331	Mr Neil Traeger		
	DR383 & DR398	Noel McIntosh		
	DR401	Bill and Helen Frew		
	DR402	Nicholas Braithwaite		
			Financial	Financial
			<p>85% Owner as 'cash cow' – asset rich, cash poor</p> <ul style="list-style-type: none"> • High, increasing & continuous maintenance, legal, insurance costs • emotional cost of compliance without compensation • Large costs from need to employ experts • difficult to substantiate or quantify community benefit, but owners' costs clear <p>85% loss of property value with no compensation</p> <ul style="list-style-type: none"> • Property principal economic asset, once listed reduced utility – inequitable as can't be put to highest and best use • Paltry conservation grants and funding • Difficulties using heritage property as collateral • Distortions in tax system which is based on land value • Tax deductibility provisions inadequate • commercial owner can't deduct extra heritage related maintenance costs 	<p>Case for listing should be based on assessed community benefit</p> <ul style="list-style-type: none"> • Every listing & DA to include financial (owner) impact assessment • Authorities should assess owner's capacity to care for property • Listing should only occur with agreed conservation agreement <p>Public should bear costs of heritage conservation</p> <ul style="list-style-type: none"> • Council should purchase heritage properties and care for them • Strategies to assist owner with maintenance of property • Free assistance with preparation of DAs, HIS and CMPs • Extra assistance for owners not paying tax • Insurance arrangements negotiated so owner not disadvantaged <p>National inventive program to assist owners</p> <ul style="list-style-type: none"> • Loss of agreed market value should be paid as compensation • Heritage property values should be discounted for taxation purpose • Exemption programs from State/local rates & taxes • Establishment of Heritage Assistance Fund from % of council rates • GST exemption for certified conservation materials and work • Allow more flexibility to usage (eg explicitly allow internal, heritage-sensitive subdivision of enormous houses in an R1A zone)
			Draft report recommendations	
			The majority supportive	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
9	25	Ms Christine Stewart	Procedural	Procedural
Commercial owners (of heritage listed property)	34	Adelaide Arcade	50% Nomination, listing imposed without consultation	Improvements necessary to streamline heritage management
	65	Bendigo Pottery		
15 Owners	88	Ms Christine Whittam	42% Conflict between business imperatives and heritage conservation	<ul style="list-style-type: none"> • Clarification needed of roles of governments, agencies • Commitment to transparent decision making processes • Consultation and provision of information to owners prior to listing
	91	Lancefield Old B&B		
15 Submissions	161	Marriner Theatres	42% Burdensome heritage & planning administrative processes	Ports should be exempt from heritage legislation
	DR232	Summit Air Travel		
	DR250	The Makris Group of Companies		
	DR252	Mount Prior Vineyard		
	DR253	Fremantle Ports		
	DR292	DB and M Frankos		
	DR294	Public Schools Club Inc		
	DR296	Association of Australian Ports and Marine Authorities Inc		
	DR336	University of Adelaide Finance and Infrastructure		
	DR399	Sea Freight Council of Western Australia		
			25% Poor communication, consultation, provision of information to owners	Heritage assessment should consider economic and social implications of listing
			<ul style="list-style-type: none"> • Confusion re implications of listing • Confusion re roles of governments, agencies re heritage • Heritage assessment lacking rigour, transparency • Lack of certainty re redevelopment options 	
			8% Heritage listing, management, intrusion on owner's privacy	Partnership between owners & regulators to develop guidelines to ensure listing has positive impact on heritage significance and commercial value of property
			<ul style="list-style-type: none"> • Owners technically ill-equipped, dependant on experts 	
			Financial	Compensation for loss of development rights must be considered
			80% Owners bearing excessive burden of heritage conservation	Program of incentives, advice and support essential to offset costs necessary to offset costs
			<ul style="list-style-type: none"> • Owners' financial outlay adds little to capital value of property 	
			50% Loss of development rights without compensation	<ul style="list-style-type: none"> • Reintroduction of Commonwealth tax incentive scheme • Improved valuations for land tax and rate assessment for heritage buildings • Expenditure on heritage fabric should be fully deductible • Accelerated depreciation rates for fire, safety and other such requirements
			<ul style="list-style-type: none"> • Difficulties valuing & realising value on heritage property 	
			50% Heritage buildings cost more to maintain, insure and operate	Governments should assess the adverse impacts subsidisation of new facilities has on heritage businesses
			<ul style="list-style-type: none"> • Excessive costs of mandatory expert reports, assessments 	
			50% Inadequate, erratic, rate and tax concessions	
			<ul style="list-style-type: none"> • Commercial properties low priority for grants, funding 	
			8% Government subsidies to new venues disadvantage heritage facilities	
			Draft report recommendations	
			Majority supportive	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
10	2	David Hutchison	Procedural	Procedural
Professional/ academic individuals	4, DR217	Dr Richard Bramley	75% Lack of consistent national heritage framework	Implementation of Integrated National Heritage Policy:
	6	I J S Bowie		
62 Individuals	10	D J Mulvaney AO, CMG	<ul style="list-style-type: none"> Inconsistent legislation & heritage principles & practice Lack of comprehensive listing, identification and assessment programs Federal changes not accompanied by complementary state legislative reforms Unnecessary duplication, conflicting, contradictory approaches, and bureaucracy Many gaps allowing important heritage places to be overlooked, neglected or lost 	<ul style="list-style-type: none"> 3 tier system with Commonwealth leadership and funding; incorporating best practice elements from all jurisdictions; referenced in local government planning schemes and policies; providing consistent statutory protection across all jurisdictions; methodical standardised identification and conservation program; single comprehensive listing process for all levels of significance; appropriate mechanisms for delegating management responsibilities; holistic heritage framework.
	17	Ms Helen Hannah		
69 Submissions	20	Ian Evans, OAM	65% uneven quality of heritage criteria and assessments at local level	Government commitment to best practice stewardship
	21	Ms Sue Berger		
	22	Ms Vinita Deodhar	<ul style="list-style-type: none"> Lack of agreement over what constitutes 'adverse' impact Lack of clear guidelines re development assessment/approval processes Lack of heritage expertise in local government planning departments Dealing with multiple agencies complicates process, causes delay s Process response driven not proactive or strategic Assumption that key works (James Kerr's "A Conservation Plan" and The Burra Charter) provide benchmarks or standards confusing Absence of, poor quality of, Statements of Significance Perceived/actual conflict of interest between role of heritage advisers as adviser and assessor 	<ul style="list-style-type: none"> Requirement to justify disposal subject to independent audit Ensuring heritage values considered in all relevant decisions Government model custodian of its own heritage
	26, DR246	Ms Kath Crilly		
	28	Mr Bruce Pennay	55% Urban Heritage under pressure	Consistent professional heritage framework at local level
	30	Ivan McDonald Architects		
	31	Ross Murphy	<ul style="list-style-type: none"> Maximisation of returns from property investment Changes of use demanding extensive change to fabric and setting Population growth - demolition, land consolidation, in-fill development Failure to consider heritage implications in urban planning schemes Subdivision of curtilage and loss of setting through development 	<ul style="list-style-type: none"> Burra Charter central to conservation practice Standardisation of common terms, phrases and definitions Agreed quality standards and benchmarks Rigorous assessment criteria with inclusion/exclusion guidelines Guidelines for conservation of cultural landscapes Establishment of clear & agreed thresholds Best practice Statements of Significance models All heritage listings accompanied by SoS National program to support heritage advisers Assistance to address administrative impediments to ready compliance with BCA (see Murphy)
	33	Mr Des Hanlon		
	44, 158	Duncan Marshall	40% Dearth of heritage data impedes effective assessment, management	AHC should be enabled to be independent expert national heritage champion
	55	Mr Robert Clark		
	64	Dr Linda Young	<ul style="list-style-type: none"> Failure to coordinate heritage reporting at all levels of government No agreed consistent data collection standards APHI still very incomplete Access to existing knowledge difficult, poorly organized Inadequate comparison due to lack of comprehensive inventory Need for comprehensive survey of historic heritage places Many areas poorly researched, industrial/social heritage, cultural landscape 	<ul style="list-style-type: none"> DEH should review EPBC processes re referrals and actions
	72	Graham Brooks & Associates		
	99	Ms Susan Balderstone	35% Insufficient consideration of viable re-use options	Sustainable Heritage Tourism Program developed to ensure:
	104 & DR198, DR264	Mr Garry Vines		
	106	Assoc Prof Renate Howe	<ul style="list-style-type: none"> System mitigates against good design, optimal site use 	National heritage education program
	111	Barrie Melotte Ph.D.		
	120	Mandy Jean		
	121	Assoc. Prof. Bruce W Davis AM		
	127, DR269	David Young OAM		
	130	Lovell Chen Pty Ltd		
	137	Ms Barbara Hickson		
	152	Richard White		
	162	Tom Perrigo		
	174	Gordon Grimwade & Associates		
	182	Dr Lyn Armitage		
	185	Mr Alan Anderson		
	190	Conservation Solutions		
	DR194	Ian Pitt		
	DR197	Dr Geoff Mosley		
	DR201	Mr David Logan		
	DR205	Iris Iwanacki		
	DR206	Graham Butler & Associates		
	DR208, DR227	Mr Graeme Wiffen		
	DR210	Mr Max Scott		

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
	DR219	Mr Lew Owens	<ul style="list-style-type: none"> • BCA compliance issues affecting viability of adaptive reuse 	<ul style="list-style-type: none"> • Incorporation of heritage/history into school curriculum • National conservation award program
	DR225	Jensen Design and Planning		
	DR230	D Brown	35% disposal of government assets generally poorly managed	
	DR238	Ms Christa Ludlow	<ul style="list-style-type: none"> • Failure of government stewardship – poor community exemplars 	Establishment of National Heritage Research program :
	DR239	John Toon	<ul style="list-style-type: none"> • Contributes to loss of social capitol, decline of communities 	<ul style="list-style-type: none"> - to facilitate cultural economics research - to establish costs/benefits of heritage conservation - to assess value of environmental techniques to heritage conservation
	DR249	Mr David Potts	35% Concerns re Complexity and Flaws of the National Heritage System :	<ul style="list-style-type: none"> • Measurement of environmental benefits of heritage conservation
	DR256	Dr Judith Brine	<ul style="list-style-type: none"> • capacity of NH system to identify and protect places of national significance (eg Recherche Bay) 	<ul style="list-style-type: none"> • Provision of wider definition of 'productivity' and 'value' when assessing contribution of heritage value
	DR257	Hubert Architects	<ul style="list-style-type: none"> • ignoring of 'best practice' such as Burra Charter principles ; 	<ul style="list-style-type: none"> • Assessment of waste generated in new build
	DR259	Ron Danvers	<ul style="list-style-type: none"> • encouragement of discretionary decision-making; 	<ul style="list-style-type: none"> • Validation of value of adaptive reuse
	DR268	Authentic Heritage Services	<ul style="list-style-type: none"> • weak interim listing processes; 	<ul style="list-style-type: none"> • Recording of marketability of adaptively reused buildings
	DR283	Mr Paul Adam	<ul style="list-style-type: none"> • guidelines for CMPs and HIS inadequate; 	
	DR286	McDougall & Vines	<ul style="list-style-type: none"> • weakened protection - impact of proposed action, rather than nature of action; 	Establishment of single centralised register of heritage data
	DR288	Mr K W Payne	<ul style="list-style-type: none"> • dual management - costs increased, efficiency weakened; 	<ul style="list-style-type: none"> • Systematic surveys, typological & thematic studies
	DR291	Mr Henley Cox	<ul style="list-style-type: none"> • slow pace of establishment of NHL; 	<ul style="list-style-type: none"> • Inventory of data re demolished or degraded buildings
	DR308	Bruce Baskerville	<ul style="list-style-type: none"> • failure to provide nominators with adequate guidance; 	<ul style="list-style-type: none"> • Coordination of SoE reporting at all levels of government
	DR315	Dr Chris McConville	<ul style="list-style-type: none"> • absence of lists of heritage themes, yet nominators asked to specify a theme . 	<ul style="list-style-type: none"> • Better resourcing for development of AHPI, incorporating RNE data
	DR339	Mr Ben Gray	25% Lack of national strategy to support trades skill development	<ul style="list-style-type: none"> • Delivery of consolidated data & heritage information over web
	DR353	Carlsa Carter	<ul style="list-style-type: none"> • Expertise thinly spread, lags well behind many other countries 	<ul style="list-style-type: none"> • Systematised arrangements to locate, access and conserve records associated with heritage places
	DR355	Cr Sandra Brown	<ul style="list-style-type: none"> • Breadth and depth of technical advisory material is poor 	
	DR362	Miss Lesley -Anne Petrie	<ul style="list-style-type: none"> • Increasing concerns about availability of traditional materials 	Establishment of national conservation skills training program
	DR364	Urban & Regional Solutions	20% failure of commitment to ensure long term public interest supported over short term private development interests	HCOANZ should establish task force to review heritage courses for range, effectiveness and viability, and develop programs to:
	DR368	Ms Maggy Ragless	<ul style="list-style-type: none"> • Increasing problem of perceived inalienable private property rights versus heritage conservation and community held values 	<ul style="list-style-type: none"> • improve standard and availability of technical materials, manuals; • improve provision of high level technical advice; • ensure availability of traditional materials; • ensure building courses have traditional component; • usage of skilled trades mandatory in government conservation ; • establish trade mentor scheme, allowing employment of trainees; • fund specialist training facility .
	DR400	Ms Annabelle Stewart-Zerba	20% Division between 'historic' and 'indigenous' divisive	
			<ul style="list-style-type: none"> • Need to address limited comprehension of scarcity and value of aboriginal culture 	
			20% Community confusion re differences - heritage, amenity, character	
			20% National leadership in heritage conservation weak	
			<ul style="list-style-type: none"> • No longer standards setting, not commissioning research, engaging with practitioners in advancing heritage conservation theory and practice • AHC not acting as independent, expert public champion of heritage • DEH heritage expertise and independence appear eroded 	Development of national program to address limited comprehension of scarcity and value of Aboriginal heritage
			20% Lack of clarity re local threshold levels leads to inconsistency, confusion	Alternative approaches:
				<ul style="list-style-type: none"> • Expansion of heritage typology beyond traditional categories of

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
			<ul style="list-style-type: none"> local heritage generally regarded as 3rd rate <p>15 % Embodied energy savings not factored into heritage conservation costs</p> <p>12% disregard for views of owners in current listing process</p> <ul style="list-style-type: none"> Many owners unable to understand process and its implications - age, health, education, cultural background and limited understanding of bureaucratic systems Property rights expropriated without compensation Incentive to over-list when cost borne by the owner <p>10% Integral nature of place & associated collections not recognized</p> <ul style="list-style-type: none"> Moveable heritage not universally or seamlessly protected <p>10% Confusion about status and continuing value of RNE</p> <ul style="list-style-type: none"> Concern that RNE data will be lost, dispersed, not be fully available <p>10% Lack of systematic archaeological identification and management programs</p> <p>10 % Lack of appreciation and support for contribution of NGOs</p>	<p>precinct, place, conservation area & heritage precinct to provide for townscape, landscape, streetscape, elements</p> <ul style="list-style-type: none"> Development of more sophisticated 3-tier system of listing <ul style="list-style-type: none"> Interim protection Assessment & acknowledgement of significance Then, negotiated conservation agreement Alternative to LEP listing would be to rely on definition of relic, and to presume all buildings 50 years and older are listed, then assess Enabling of smaller sub divisions where heritage property exists would facilitate sale of heritage assets
			<p>Financial</p> <p>85% Key issue impacting on heritage conservation is lack of funding at all levels</p> <ul style="list-style-type: none"> Failure of governments to consistently resource heritage conservation, education and promotion programs impacts particularly at local level Huge in-balance between monies for natural and cultural environments Heritage conservation relies too heavily on the 'stick' (regulation), and too little on the 'carrot', (incentives) <p>60% Inadequate support for private owners bearing conservation costs</p> <ul style="list-style-type: none"> Inequitable that owners denied opportunity to fully capitalise on property Higher compliance, DA and maintenance costs Lack of support for conservation/maintenance of heritage places <p>45% Incentive programs inadequate, inconsistent, unreliable</p> <ul style="list-style-type: none"> Owners often cash poor – elderly, rural <p>35% National heritage system fails to provide incentives for conservation</p> <ul style="list-style-type: none"> Commonwealth conservation funding now only directed at national heritage places <p>30% Lack of effective framework to ensure maintenance of heritage properties</p> <ul style="list-style-type: none"> Lack of resources for essential maintenance 	<p>Financial</p> <p>National Heritage Strategy should include funding agreements:</p> <ul style="list-style-type: none"> to agree intervention required to address market failure; to provide adequate funding at local government level ; to ensure systematic approach to heritage funding; to recognize need for ongoing conservation support; to encourage transparent reporting of heritage expenditure; to investigate innovative funding programs. <p>Incentives to encourage owners to care for property</p> <ul style="list-style-type: none"> Transferable FSR established in suburban areas as in CBDs Flexibility and bonuses in planning regulations eg: <ul style="list-style-type: none"> heritage Floor Space awards, reduction in on-site parking; land tax reductions; waivers on consent application fees; planning and zoning incentives; Heritage Rate: councils levy small heritage rate then re-distribute to pay rates of each heritage-listed property to compensate for additional administrative costs;

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			<p>25% Reliance on market forces failing community</p> <ul style="list-style-type: none"> Economic benefits and costs poorly articulated in current literature <p>15% Impacts of heritage listing on property values poorly researched</p> <p>15% Inadequate recognition of economic benefits of heritage tourism</p> <p>5% Model of sustainable historic site needs rethinking</p> <ul style="list-style-type: none"> Worldwide, few achieve true self sustainability/yet funding generally predicated on that being achieved 	<ul style="list-style-type: none"> Direct grant or low interest loans, seed funding; Amendments to insurance regulation; Provision of free professional and technical advice. <p>Reinstatement of tax incentives for owners</p> <ul style="list-style-type: none"> Alternative ways of treating depreciation charges for not-for-profit companies Research and experimentation via pilot projects needed to gauge effectiveness of possible incentives Tax deduction could be offered for maintenance cost differences <p>New funding sources within better considered program structure</p> <ul style="list-style-type: none"> Consideration of use of gambling funds, UK heritage lottery Special grants (eg, Federation fund) used for on-going conservation USA type tax relief and Incentives Demolitions tax, to cover material disposal cost Investigate applicability of incentive tools used in natural environment to cultural environment Serious cost/benefit analysis should be undertaken of all heritage conservation proposals, would lead to <ul style="list-style-type: none"> More focussed approach to heritage conservation Items conserved being more highly valued Better quality outcomes in terms of urban design
			<p>Draft report recommendations</p> <p>Majority not supportive of key recommendation</p>	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
11	11, DR212	Mrs Zeny Edwards	Procedural	Procedural
Community heritage groups, including residents' associations, National Trusts	13, DR348	Convict Trail Project Inc	80% Adverse impact of development pressures <ul style="list-style-type: none"> • Demographic changes, growth of cities • Demolition of homes and gardens • Reduction in original lot sizes, removal of trees • Depopulation of rural areas • Abandoned places (residential, industrial, religious) 	Implementation of Integrated National Heritage Policy: <ul style="list-style-type: none"> • providing seamless protection to heritage places nationwide; • incorporating best-practice elements from all jurisdictions; • finalising all necessary intergovernmental agreements; • establishing clear criteria for assessment of values; • ensuring holistic protection of all heritage places.
	16	National Trust of Queensland		
	23	Mr John Davies		
	32	The Balmain Association Inc		
	40, DR237			
	Australian Council of National Trusts			
	41			
	Heritage Group of Leichhardt District			
	45, DR204			
	The Australian Garden History Association			
51	Friends of Linnwood Inc	70% Lack of training, support for volunteers <ul style="list-style-type: none"> • Ageing and declining membership and volunteer bases • Reliance on untrained volunteers for conservation, security, interpretation • Volunteers weary, burn out, carrying too great a load 	EPHC & ALGA to review Australian heritage system to: <ul style="list-style-type: none"> • analyse extent system based on appropriate combination of regulation, incentives and provision of information and services; • identify and evaluate best-practice elements of existing regimes; • review role of local government in planning and heritage protection, focusing particularly on human and financial resourcing issues. 	
54	Braidwood Residents Association			
58	Docomomo Australia Inc			
84 & DR311				
Conservation Council of South Australia Inc				
89	Dr Frank Hurley			
92	Mt Kosciuszko Inc			
105				
Brighton Residents for Urban Protection				
108	National Trust of Australia (WA)			
112	Plan: the Planning Action Network	65% Planning/heritage intersection problematic for heritage <ul style="list-style-type: none"> • Optional and sometimes politicised listing process • Lack of model heritage assessment guidelines and standards • Need for community education programs to engender support for heritage • Failure to provide clear information to owners about rights and responsibilities 	Essential elements of best practice heritage/planning regime: <ul style="list-style-type: none"> • consistency in threshold definitions across jurisdictions; • clear and mandated role for local government; • separate heritage and development regimes; • adequate enforcement powers and resources; • clear, timely, thorough and transparent processes; • provision of incentives and support/resources for owners; • appeal rights (restricted for listing, more open for end use); • Provision of Statements of Significance as matter of course; • clear statement of property information, restrictions; • guidelines for obligations and support for owners. 	
114, DR334				
The Glebe Society				
119	Kosciuszko Huts Association Inc			
125	Residents 3000 Inc			
129	Carlton Gardens Group			
131	National Trust of Australia (Tasmania)			
133	Phoenix Aero Club			
142	Balmain Precinct Committee			
144	Friends of Quarantine Station			
146	Lidcombe Heritage Group Inc	45% Failure of governments to be exemplary stewards of own properties/ <ul style="list-style-type: none"> • Insufficient funding for agencies to care for heritage property • Complexity reconciling community expectations with commercial needs • Multi government ownership and administration impedes best use options • Governments increasingly seen: <ul style="list-style-type: none"> – as retreating from community ; – of making laws and then not abiding by them; – of setting up systems doomed to failure due to lack of financial support – of 'selling off the public farm' for profit. 	Heritage' should be regarded & managed holistically: <ul style="list-style-type: none"> • inclusive of place and setting; • inclusive of associated collections. 	
148 DR272				
National Trust of Australia (Vic)				
156	Christian Bell			
159				
Tanya Warms & Elizabeth Hore				
172, 180, DR358				
		40% Failure to achieve agreed Integrated National Heritage Policy <ul style="list-style-type: none"> • No inter/intra-governmental agreements • Lack of seamless, inclusive protection nationwide • Inconsistency impedes holistic management of places of multiple values • Plethora of poorly integrated and inconsistent heritage 'lists' 	Establishment of National Skills Training Program <ul style="list-style-type: none"> • Incentives to encourage trades people to upskill • Regional clearing-houses to connect clients with rarer trades • Promotion of groups of accredited 'traditional trades'-trained persons • Legislation to prevent false marketing of 'heritage' expertise • Inclusion of cultural heritage in tertiary education/ training 	
		30% lack of consistent data about state of Australia's heritage places <ul style="list-style-type: none"> • Dearth of hard data, metrics on value impact of historic heritage regulatory regimes • No consistent and consolidated national data sets on heritage places 		

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	No.	Authors		
	National Trust of Australia (NSW) 191, DR387		<ul style="list-style-type: none"> Lack of heritage research programs like NEGP 	<p>National heritage research program established to:</p> <ul style="list-style-type: none"> underpin academic and community education programs; audit existing heritage data and bibliographic information; ensure public availability of consolidated national data; consolidate existing research commission new studies, eg, <ul style="list-style-type: none"> define community value of 'heritage' broad ranging studies like <i>EH Power of Place</i> study consumer's 'willingness to pay' survey. review contentious issues <ul style="list-style-type: none"> property rights and heritage conservation, planning and to land use regulation solicit, record and make material available from community archives <p>Key criteria for evaluating existing heritage/planning regimes</p> <ul style="list-style-type: none"> Clarity—How easy is it to understand? Consistency—Does it produce similar outcomes in equivalent circumstances? Credibility—Does it produce outcomes that are fair and credible? Timeliness—Does it give outcomes in time for critical decisions? Transparency—Is the process open and available to all, with efficient dispute resolution processes? <p>Governments should demonstrate exemplary stewardship through:</p> <ul style="list-style-type: none"> adopting strategies which avoid redundancy; facilitating reuse of heritage places; managing places holistically and sustainably; considering results of <i>Managing our Heritage</i> study (Vic); producing CMPs & publicly report on heritage-related costs. <p>Development of Australian Story national education program:</p> <ul style="list-style-type: none"> to enable annual visitation of historic sites by all students (as in UK) to develop heritage related education programs & teacher training <p>Program supportive of conservation of historic gardens to:</p> <ul style="list-style-type: none"> develop and implement best practice conservation planning; require developers to fund public open spaces, heritage gardens.
	Kew Cottages Coalition DR203 Jack Kershaw		<p>25% visitation to historic sites has reduced.</p> <ul style="list-style-type: none"> Visitor expectations of historic sites have risen considerably Poor quality of heritage experience compared to other attractions NFP heritage sites particularly disadvantaged 	
	DR216 & DR 276 FOKE Ms Anne Carroll & Ms Janine Kitson DR218,		<p>25% Trades skills shortage threatens nation's cultural heritage</p> <ul style="list-style-type: none"> Inadequate training programs 	
	Adelaide Parklands Preservation Association DR220 North Adelaide Society Inc DR223		<p>20% sustainable management of historic site increasingly demanding</p> <ul style="list-style-type: none"> More sophisticated interpretation of the past required Increased expectations regarding quality of presentation Higher standards of curatorial and conservation practice required OH&S, food safety, insurance, disabled access provisions all impacting 	
	Eagle Farm Heritage Committee DR224, DR327		<p>15% National Trusts struggling to conserve, present properties well</p> <ul style="list-style-type: none"> Harder to attract members and volunteers in support of historic sites. Increased focus on properties detracts from community education, advocacy Lack of resources to review and renew property portfolios Vast geographic spread of Trust properties and collections Difficulties with security, essential maintenance 	
	Castle Hill Community Committee DR248 Glebe Point Residents Group		<p>15% Reliance on volunteer impeding best practice collections management</p> <ul style="list-style-type: none"> Much vital information rapidly being lost as volunteers age and retire. Large part remains not professionally documented or properly stored. Need professional resources to assess significance and provenance 	
	DR260 Parkville Association Inc		<p>10% Community archival holdings not readily accessible</p> <ul style="list-style-type: none"> Need programs to assist organisations make archival holdings available Poor provision of training, skills development for staff, volunteers 	
	DR287 Port Melbourne Historical & Preservation Society Inc		<p>10% AHC failing to provide national leadership</p> <ul style="list-style-type: none"> Lacks independent resource or research base 	
	DR307 Friends of the City of Unley Society Inc		<p>8% historic gardens and parks under appreciated & poorly funded</p>	
	DR309 Kensington Residents' Association Inc		<p>5% Heritage conservation under great pressure in Northern Territory</p> <ul style="list-style-type: none"> Poor protection, little assessment, flawed management of heritage 	
	DR313 Protector of Public Lands Victoria Inc			
	DR321 Walter Burley Griffin Society			
	DR326 Central Coast Community Forum			
	DR329 Coalition Chippendale Community Group			
	DR343 Macedon Ranges Residents Association			
	DR369 The Reynell Business and Tourism Association Inc			
	DR370 City of Sydney Combined Residents Action Groups			
	DR372 The Haberfield Association			
	DR374 Residents for Environment and Character Conservation			
	DR397 Woollahra History and Heritage Society			
	DR403 Portland Historic Buildings Restoration Committee Inc			

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	DR417	3068 Group		<p>Commitment to creating an 'informed community' through:</p> <ul style="list-style-type: none"> • provision of education on built environment and its conservation • facilitation of community involvement in heritage conservation • public education programs on heritage values and management • readily accessible advisory services and technical assistance • support for network of regional/local heritage committees • support for 'heritage champions' at each level of government
			<p>Financial</p> <p>60% Lack of incentives program to support owners</p> <ul style="list-style-type: none"> • No strategic investment in heritage properties • No systematic alignment between community benefit and conservation costs <p>60% NFP places starved for funds, generally operate at loss</p> <ul style="list-style-type: none"> • Insufficient income to cover operating, maintenance costs • Inability to invest in interpretation, presentation, public programming • Little ability to train, support volunteers <p>40% NGO Difficulties with short term & specific purpose grants</p> <ul style="list-style-type: none"> • Difficulties developing long-term strategic management programs • Ratio of demand for heritage grants versus funding offered approx 30:1 • Lack of capacity of NGOs re application, accountability • Applications generally for work, but CMP funding needed <p>20% Problem with NFP 'sustainability' funding model</p> <ul style="list-style-type: none"> • Presumption of self sustainability is at odds with reality • Few heritage sites open to the public are profitable, or cover operating costs • All need on-going subsidy & support <p>35% Gross disparity between natural, cultural heritage funding</p> <ul style="list-style-type: none"> • NHT funds not available for cultural heritage, even for gardens!. • No national support for community heritage programs • Natural environment attracts increasing number of volunteers 	<p>Financial</p> <p>Cultural Heritage Trust should be established, cf, NHT, to create:</p> <ul style="list-style-type: none"> • Heritage Stewardship Fund, to assist jurisdictions support owners • Heritage Care Program, to encourage community conservation • National Heritage Research Council to fund heritage research, and ensure availability of consolidated data <p>Heritage conservation costs should be shared between governments and community</p> <ul style="list-style-type: none"> • Recognition that heritage responsibilities have funding implications • Funding support should be directed to NFP sector & private owners where market failure can most be observed <p>Incentives should be used to balance regulation:</p> <ul style="list-style-type: none"> • reconsideration of <i>Making Heritage Happen recommendations</i> • tax exemptions and rebates. GST refunds • use of market auctions and revolving funds • exemptions on authorised conservation expenditures/ expenses • partnerships with banks to provide grants or low -interest loans • use of public good outcomes of nature conservation on private land <p>Government should fully fund its stewardship responsibilities</p> <ul style="list-style-type: none"> • Full disclosure of government financial dealings regarding disposal • Exemplary management of heritage places in their care <p>The AHC should be funded to fulfil its functions under the Act</p> <p>Funding should be provided to the NFP sector so it can better provide education, advice and support to community and owners</p> <ul style="list-style-type: none"> • Conservation and interpretation of community owned heritage places

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
				<ul style="list-style-type: none"> Ongoing management of collections and their interpretation

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
			<i>Draft report recommendations</i>	
			No support for key recommendation	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
12	7	Organ Historical Trust of Australia	Procedural	Procedural
Special interest groups, associations not directly focused on heritage	36	Braidwood Historical Society	40% collections of historic material under threat <ul style="list-style-type: none">• Dependant on volunteers, gifts of conservation materials & rent-free accommodation• Only modest project grants available• Lack of volunteers, training and support• Insurance costs high, and difficult to insure volunteers over 80	National program to support conservation of historic records <ul style="list-style-type: none">• Historic collections fundamental element of Australia's social capital, especially in regional Australia• Historical societies a "good fit" for historical buildings, but need greater support from government• Proper storage facilities needed for displaced objects under threat
	37	Royal Australian Historical Society		
	38 & DR221	Nepean Historical Society Inc		
	47	Ms E Cummins		
	50 & DR333	Manly, Warringah and Pittwater Historical Society		
	56	Arms Collectors Guild of NSW		
	53	Bruny Island Historical Society		
	60	Hornsby Shire Historical Society		
	61	Royal Historical Society of Queensland		
	63	The Polish Historical Institute in Australia Inc		
35 Organisations	69 & DR376	Federation of Australian Historical Societies Inc	25% Churches struggling to care for heritage property <ul style="list-style-type: none">• Public expectations of retention of traditional churches• Absence of maintenance, support programs• Spiralling costs of maintenance• Redundant churches prey to vandalism, fire, theft• Changing demographics – loss of congregations• Exhaustion of volunteer resources• Churches difficult to alter, adapt or dispose of	Community heritage management to be strengthened through: <ul style="list-style-type: none">• establishment of 'Heritage Care' Program;• specialist volunteer training packages;• public education programs;• expansion of Heritage Advisor role to include community capacity building and public awareness-raising;• assistance to participate in heritage consultation processes;• greater emphasis on historic significance in the assessment, conservation and interpretation of historic heritage places.
	76, DR241	Uniting Church in Australia		
	79	Royal Historical Society of Victoria		
	82	Bathurst Information Neighbourhood Centre Inc		
	86	Willoughby Historical Society		
	102	Burwood & District Historical Society Inc		
	110	Jaycees Community Foundation Inc		
	113, DR209, DR281	Save Braidwood Inc		
	128	Richard Falkinger		
	135	Buninyong & District Historical Society		
42 Submissions			25% Moveable heritage items under threat <ul style="list-style-type: none">• Lack of resources for essential maintenance & restoration work• Problems of location - neglect, fire, vandalism, storage• Increasing costs of maintenance• Compliance with increasing OH&S, safety and public insurance requirements	Local Government Regulatory Reform Necessary <ul style="list-style-type: none">• Development of standard criteria and thresholds• Provision of more flexible adaptive reuse provisions• Streamlining and rationalisation of local planning controls• Widening of concessional planning and zoning arrangements for heritage places to actively encourage adaptive use• Adjustments of control on locally significant buildings to level of significance• Ensuring demolition does not occur without expert assessment• Dispensation/reduced premiums for insurance coverage• Documentation and publicly reporting on heritage related costs• Establishment of measures for collecting, maintaining and disseminating relevant heritage information
		25% development pressures impacting heritage adversely <ul style="list-style-type: none">• Places are listed, protected, but not conserved• High density development encouraged by state government• Integrity of heritage sites dwindling, sense of community being lost• Councils lack funds to embark on studies to identify heritage• Lack of heritage expertise in council staff• Lack of community education programs	Research program to assess community heritage contribution <ul style="list-style-type: none">• Evaluation of regional Australian income derived from tourism• Assessment of value of work of volunteers in historical societies• Development of tools for incorporating social capital considerations into policy analysis	
		20% Fear that listing will impact future economic well being <ul style="list-style-type: none">• Listing process imposed on owners		
		12% Proposed name change of Kosciuszko without stakeholder consultation		
		10% Heritage lists not representative due to limited involvement of historians in heritage assessment process		

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	No.	Authors		
	151 DR207	Polish Community Council of Australia and New Zealand.	Financial	Financial
	155	Polish Scouting Association Z.H.P. In Australia I	45% Inadequate financial support for community heritage conservation	Commonwealth should review adequacy of support provided for historical societies and owners of cultural heritage places in regional Australia
	160	Anglican Church of Australia Diocese of Tasmania	30% Grants cumbersome and inadequate to meet needs	
	163	Compatriots Movement, Polish Ex - Servicemen's Association Sub-Branch No 8 and Polish Group of Radio 4EB FM 98.1	30% Tax system mitigates against NFP conservation needs	Program of financial incentives for owners of heritage buildings
	DR226	R Marks and M Adams	<ul style="list-style-type: none"> • Systematic scaling down of Federal Government funding • Land tax exemption ceases if commercial rental obtained to sustain place • Non-receipt of tax concessions because often no income • Congregations, volunteers lack funds to qualify for GST refunds 	
	DR245	Strathfield Residents Action Group	15% Insurance costs too high	<ul style="list-style-type: none"> • Maintenance support for private and government properties • Reinstatement of tax concessions with first priority given to NGOs • Low interest loans and revolving fund mechanisms • Support for meeting standards under building and access codes • Specialised support – eg, Heritage Lottery (cf UK)
	DR262	H M P Stock		
	DR274	Christian Heritage Australia	<ul style="list-style-type: none"> • difficult to insure volunteers over 80 	Innovative Program Ideas
	DR278	Hills District Historical Society Inc		<ul style="list-style-type: none"> • Leveraged tax deduction program, similar to that previously offered for expenditure on Research & Development (Jaycees suggestion)
	DR289	Coorparoo Christian Assembly		Local Government assistance program to support community heritage conservation through:
	DR298	Burnside Residents Action Group		
	DR302	Astronomical Society of Victoria		
	DR316	Norwood Payneham St Peters Residents Rights Group		
	DR363	Mt Druitt Historical Society		
			Draft report recommendations	
			12% opposed	
			12% supportive	

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	No.	Authors		
13	77	Mr John Shawcross	<i>Procedural</i>	<i>Procedural</i>
General Public	90	K Henderson	50% Concerns re specific heritage places 'at risk'	Protection of identified places under threat through federal action
	141	Barry Chapman		
12 Individuals	168	Betty McCarthy	<ul style="list-style-type: none"> • Adelaide Parklands unprotected at state/local level despite • 19c buildings along Stirling Terrace (Albany) under threat • Glass House Mountains, and Matthew Flinders Park endangered • Failure to implement Richmond Cultural Resource Management Plan 	Recording of heritage places electronically, and establishment of public repository for these records
12 Submissions	169	Dr GJ Abbott		
	DR222	Mr Stefan Zanghi		
	DR235	Robert G Goligher		
	DR243	Ms Shirley McNamara		
	DR303	Ms Wendy Greiner		
	DR361	Ms Margaret Dingle		
	DR381	Dr Christopher D Starrs		
	DR405	Mrs Josie Davidson		
			<ul style="list-style-type: none"> • Lack of care of Australia's heritage has diminished environment • Current system under resourced • Lack of history, geography in school curriculum • Conservation of historic heritage fragmented and discontinuous 	The profile of 'heritage' in the community should be raised
			<i>Financial</i>	<i>Financial</i>
				Use of heritage lottery as in the UK
			Draft report recommendations	
			33% disagree	
			10% agree with qualifications	

Category	Submissions		Issues (and %)	Identified needs/actions
	No.	Authors		
14 International 2 Individuals 2 Submissions	35 DR233	English Heritage Donovan D Rypkema, Heritage Strategies International	<p>Procedural</p> <p>100% Perception of private 'property rights' conflicting with public heritage benefits</p> <ul style="list-style-type: none"> UK development control legislation challenged by illegal demolition and claims of human rights violation through heritage listing <p>50% Labour and skills shortages impacting on quality of conservation</p> <ul style="list-style-type: none"> Great damage to historic fabric through inept repair work 	<p>Procedural</p> <p>In the UK, steps are in hand to:</p> <ul style="list-style-type: none"> refute connection between heritage regulation and human rights (private property) violation; persuade the Government to exempt places of worship from VAT; consider benefits of incentives, similar to US tax incentive scheme including: <ul style="list-style-type: none"> new investors being brought into heritage property development increased urban regeneration taking place provide increased support to encourage traditional crafts and trades skills training establish peer review mechanisms for conservation work to raise standards increase emphasis on sustainability contribution of heritage buildings – with emphasis on value of embodied energy
			<p>Financial</p> <p>100% Costs of historic preservation are vastly easier to calculate than benefits.</p> <p>100% Regulation insufficiently balanced with incentives</p> <p>50% UK Heritage inequitably supported through tax system</p> <ul style="list-style-type: none"> VAT levied at 17.5% on conservation, repair and maintenance (not on new construction) The UK does not have Tax Incentive scheme 	<p>Financial</p> <p>Regulations (sticks) should be balanced with incentives (carrots),</p> <p>Role of heritage rehabilitation as incubator of small business should be better measured and acknowledged in policy</p> <p>Judgement of 'economic hardship' should be based on "reasonable' not 'maximum' return</p>
			<p>Draft report recommendations</p> <p>strongly opposed</p>	