

Good day.

This submission is concentrated on part of Reform direction 2.5:

Replace broad heritage protections with more targeted heritage listings with cost-benefit analysis and review processes. Blanket heritage areas should be replaced by heritage listings for specific buildings or small areas. Targeted heritage listings should be justified by cost-benefit analysis and there should be more robust mechanisms to review and delist buildings. Targeted heritage listings should be justified by cost-benefit analysis and there should be more robust mechanisms to review and delist buildings. • Review and reduce neighbourhood character restrictions. Restrictive overlays which apply blanket restrictions to entire streets or local government areas should be reviewed and replaced by targeted protections where possible.

I am a resident of Maldon, in central Victoria. It is a small town of 1500 people on the side of a mountain and amid 19th century gold diggings. It should have fallen into ghost town status in the 1920s and nearly did mid-century. In the 1960s all things colonial became fashionable and the National Trust of Australia (Victoria) took interest in the decrepit nature of the commercial centre where shopkeepers had defied the 1853-1857 surveyors and clustered around a source of water. Seventy years on, Maldon survives on tourism generated by those controls won by the Trust: heritage overlays.

The heritage overlay argument is international. Australia signed the UNESCO World Heritage Convention (1972) on 16 November 1972 to identify, protect, and preserve cultural and natural heritage of outstanding universal value. Heritage has an admittedly a much diminished focus; nevertheless the Australian Government formally approved the Victorian Goldfields' progression to the UNESCO World Heritage Tentative List on 31 January 2025.

The prelude to the Convention which the Australian Government continues to be obligated states in part: (protection of) *groups of buildings: groups of separate or connected buildings which, because of their architecture, their homogeneity or their place in the landscape, are of outstanding universal value from the point of view of history, art or science;*

In summary, the Productivity Commission would be at odds with the current Australian Government stance if it recommended the wholesale removal of the hard-fought heritage overlays within States and Territories' residential/commercial/historic planning processes. Please reconsider this aspect of 'affordable living' elements and support the protection of heritage areas of value to the nation. This would align with Europe's tourism economies, which seem well supported through their extensive World Heritage listings (heritage overlays).

Thank you.