

31 July 2026

SUBMISSION TO AUSTRALIAN GOVERNMENT PRODUCTIVITY COMMISSION
'HOUSING SUPPLY REGULATION – INTERIM REPORT'

- 1) I am a retired Chief City Planner, with specialization in Heritage Planning.
- 2) My sense is that the Interim Report has significantly ill-considered the virtues, systems and practicalities of heritage listings, zonings and overlays.
- 3) The Report advocates four 'Principles' but clearly misses a much needed 'fifth', to do with amenity, which is surely an equally paramount consideration? ... suchlike as '... protect or enhance residential amenity as new housing development, or redevelopment proceeds' ... including the 'bleeding obvious' considerations like overshadowing, wind tunnel prevention, traffic congestion, access to green space, solar access and so forth'... Possibly the last of these a relevant simple example, insofar as bulk new housing that is south facing, versus north facing, is not necessarily an economic advantage!
- 4) The report lacks credible Evidence of heritage being an undue constraint on housing supply ... the citations at Box 2.5 are very underwhelming. There seems to be no understanding that in most places, heritage planning considerations do NOT prevent a planning application for redevelopment ... indeed adaptive re-use of heritage sites and buildings is the very cornerstone of modern heritage planning practice, often with in-built development incentives to do so.
- 5) The report also gives the impression that heritage provisions are applied 'willy nilly' and are not carefully considered in preparation, which is demonstrably incorrect. The report also implies that such provisions apply for 'all time' and cannot be undone, whereas, of course, the relative planning rules in the jurisdictions do make provision to change heritage site requirements, should there be good case-study reason, in the public interest, to do so.
- 6) As a bit of an aside, the report seems to be transfixed on the notion that all housing requires a Profit imperative. I am not sure where this came from? In many cases peoples homes, and their enhancement of them, particularly, but not only, in heritage conservation locations, is a matter of residential amenity, over long term life spans, and is not short-term profit driven.
- 7) In summary, and in angst, can I draw the Commission attention to the deeds of 'Whelan-the-Wrecker', in the 1950-60s who almost single handedly destroyed much of the beauty of goldrush/boomtime Marvelous Melbourne, through incredible ignorance of what is important in the long term, for a City. Where would the economic vibrancy of Melbourne City be now, if the historic Regent Theater had been pulled down, for 'profit' in those days? Please, Commission, take a few moments of your valuable time, to view a screening of the recent film 'The Lost City of Melbourne' ...even a few moments with the Trailer will bring you nearly to tears, regarding the vandalism that preceded the Green Bans and the heritage planning movement.
- 8) Of course, on an international realm, there is the seminal city planning text 'The Death and Life of Great American Cities' from 1961, for your review.
- 9) So, what remains the task for Housing Supply in harmony with heritage planning, is improvement, not 'throwing out the baby, with the bathwater' as the Interim Report foreshadows.
- 10) I would be happy to speak or to present to the Commission, if that would assist.

Neil Head [Redacted]

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***[Retired City Planner – including former National Executive Officer,
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