
SIMPLAN - Feedback- Interim Report Productivity Commission- Housing Supply

Thank you for the opportunity to comment on the above report.

I concur with certain recommendations in the report (e.g. removal of FSR controls). However, I must strongly object to the recommendations concerning heritage and more specifically, inherently flawed comments in the interim report stating that heritage listings should be removed or reduced if a “cost benefit” analysis indicated that this is justified. Please note that “heritage significance” is NOT a “commodity” and as such, a “cost benefit analysis” (the results of which would likely always favour developers) is entirely inappropriate. I reside in a heritage conservation area and the value to me in terms of amenity, architecture and the history of my street is immeasurable and clearly cannot be measured in simplistic \$\$ terms. How on earth would a “cost benefit analysis” value this??

It also appears that no formal or informal consultation regarding heritage matters has been undertaken with Councils or statutory heritage bodies. Rather, numerous references to “YIMBYS” , the Urban Taskforce, and certain economists, (some of whom it is noted are members of a right leaning think tank who consistently and stridently oppose “heritage” listings without supporting evidence to the contrary) are common in the report.

As such, with respect, the recommendations concerning heritage are considered biased, flawed, uninformed and unbalanced. The “simplistic” aspect of the report concerning heritage significance is extremely disappointing. I would have expected a document of much higher quality which offered a balanced opinion on important matters of heritage significance and which adequately responded to feedback from important bodies responsible for maintaining Australia’s heritage at the federal and local level. This has not occurred.

The proposal to permit 3 storey development everywhere is also simplistic. Three (3) storey development can have adverse effects on adjoining lower scaled properties. It also has the potential to introduce inappropriate built forms in otherwise cohesive 2 storey streetscapes. I have recommended that townhouse development be permitted in most residential zones subject to appropriate setback, landscape area and height controls so that proposals “fit” in the streetscape and the amenity of neighbours is not unduly compromised. Two (2) storey townhouses with a “room in the roof may be acceptable.

Note: Heritage conservation areas should be *excluded* from any rezoning proposal for self-evident reasons which the Commission has failed to address.

I have provided further more detailed comments in **red** text in the report extract which follows.
I do hope the Commission consults more widely and appropriately and reviews its recommendations concerning heritage significance. The Commission should not be “captured” by pro- development groups (as appears to be the case) who clearly have no interest other than to sacrifice areas of heritage value on the “altar” of redevelopment.

Finally, I believe that controls which encourage design excellence and which are essential for safety reasons should be retained, otherwise it will be “race to the bottom” in terms of poor urban design and an erosion of consumer confidence. Many “complying development” proposals already exhibit poor design attributes.

I will be forwarding a copy of my submission to the local State member and to the responsible Federal Minister for information.

Kind regards

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