



Kingston & Barton Residents Group Inc.

11/1 Sydney Avenue Barton ACT 2600 kingstonandbarton@gmail.com

Aims to ensure the Kingston and Barton area is a great place to live, by:

- o High quality planning, urban design and construction
- o Preservation and recognition of the area's unique heritage character
- o Provision of adequate green open spaces
- o Effective transport planning – for traffic, parking, pedestrians & cyclists
- o Strong community spirit and quality of life

To: Australian Government Productivity Commission

‘HOUSING SUPPLY REGULATION’ INTERIM REPORT JULY 2026

This submission refers to several parts of the Interim Report dealing with heritage protections, starting with *‘Reform direction 2.5: Review, reduce and remove land-use controls that reduce commercial feasibility and do not adhere to best practice principles’* and specifically to the second dot point: *“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.”*

The Kingston and Barton Residents Group has a strong interest in heritage. The ACT suburbs of Kingston and Barton were some of the earliest developed in the National Capital and consequently contain many significant and highly valued heritage sites. Mostly they are important markers of significant periods and aspects of the development of the National Capital.

Of special relevance are the heritage registered Garden City housing precincts that preserve a sample of Federal Capital Commission housing from the 1920s and 1930s. They are also near parks created at the same time and are now greatly valued. Without heritage controls to protect these precincts there would be no single dwellings left in Kingston or Barton (which are now 90% apartments), thus limiting housing choice. There is a cost associated with lack of choice.

As time passes the value to the community of these sites and the landscape in which they sit is increasing, especially as they are surrounded by dense urban development.

Heritage controls (page 41 of Interim Report)

Of course heritage controls constrain housing supply and for good reason. As the Interim Report says ‘Heritage overlays can benefit the community by protecting important and unique land and buildings that have historic, architectural or cultural value’ (p. 41).

Historically, the balance between heritage protection and development has waxed and waned. However, it must be remembered that **the loss of heritage is permanent** - it cannot be replaced. Short to medium term objectives like improving housing supply can have permanent implications for national and local heritage.

The costs and benefits of heritage protection (page 42 of Report)

A truly rigorous analysis of the costs and benefits of heritage protection cannot be ascertained without a widely accepted methodology for valuing heritage. Many assertions are made about specific costs and benefits without placing them in an overall context so it can be assessed how they balance out.

Heritage cannot be valued in purely economic terms because there are many aspects of its value that are social, environmental and more. For example, in our suburbs the mature tree canopy in the heritage registered Telopea Park and the heritage housing precincts are highly valued by the community and help to reduce urban heat.

‘Densification’ often creates additional costs such as having to run airconditioners for longer periods over summer.

To illustrate what are heritage values, NSW Heritage conducted a survey and found the top six survey responses selected to the question ‘Why is heritage important to you?’ to be:

- It connects us to the past.
- It should be preserved for future generations.
- It creates a sense of belonging to a place or Country.
- It adds to the character of a place.
- Retaining and reusing heritage places contributes to sustainable development.
- I appreciate architectural features or design.

How do you put a value on these? They cannot be assigned a purely economic value.

Studies of heritage value in the UK have attempted to value heritage and include factors such as tourism, skills development etc. One example is the Historic England study at the link below.

<https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/economic-value/>

Also worth noting is the following:

<https://www.heritage21.com.au/observations-about-heritage/the-benefits-of-heritage/>

A significant benefit of heritage overlays is the protection of **housing choice**.

The matter of housing choice appears not to be addressed in the Interim Report. As a result, the impression is given that some housing choices are to be discouraged and supply limited even if considerable demand exists. Should increasing housing supply be at the expense of housing choice?

In the Kingston and Barton area the only reason why there is a choice of housing types, especially for single dwellings, is the heritage overlay. Without it that choice would not be available.

Enabling reforms (page 55 of Report)

There appears to be a view that places are registered indiscriminately and without rigorous assessment. This is far from the truth. The ACT Heritage Registration system requires one or more criteria to be satisfied and sets a high threshold level. The criteria are based on the internationally recognized Burra Charter to which Australia is a signatory.

Richard Johnston President
KBRG
[Redacted]

24 September 2026