

SUBMISSION RE PRODUCTIVITY COMMISSION HOUSING INTERIM REPORT

I wish to take issue with three parts of the **Enabling Reforms** section of this report:

Remove or reduce parking requirements

Removing minimum off-street parking requirements may make a new development cheaper, but experience of high-density housing with minimal parking has shown that this simply increases parking congestion in residential streets. The suggestion that 'sufficient public transport connectivity' removes the need for housing occupants to own cars and need parking is unrealistic for two reasons: (a) many/most people want the flexibility and convenience of owning cars; and (b) public transport in large cities like Melbourne have quite good connectivity into the city but this is very limited laterally (and does not support activities like carrying bulky loads home from a Bunnings hardware store).

Housing developments lacking adequate parking may find that buyers are reluctant: the number of car spaces is a key selling point in real estate advertising.

Replace broad heritage protections

Review and remove other restrictive overlays

I am addressing these two proposed reforms together as they are closely interrelated.

Heritage protections and neighbourhood character overlays are actually designed to prevent higher-density dwellings if they are perceived to disrupt the distinct character of a locality. As a nation with a short history of built-form housing, we have already lost considerable numbers of well-built houses reflecting the style, workmanship and history of the periods in which they were built. It is this very neighbourhood character, often comprising numbers of heritage-protected dwellings, that attracts people to live in these areas.

Citizens and levels of government who represent them should be allowed to make these qualitative judgements, rather than the determinations of faceless bureaucrats. Indeed, proper cost-benefit analysis entails consideration of more than simply financial costs and benefits.

It is also unclear as to why cost-benefit analysis of targeted heritage listings should include 'consideration of cultural value to Aboriginal and Torres Strait Islander people' but not the values of the rest of the population.

The proposal does not demonstrate how restrictive overlays 'do not adhere to best-practice principles': what is best practice (simple cost-benefit analysis?) and who determines it?