

Kevin Krastins

[Redacted]

29 September 2026

Dear Sir/Madam

Re: Productivity Commission 2026, *Overview - Interim report - Housing supply regulation*, Interim report

Please accept my submission to the Commonwealth Productivity Commission 2026, *Overview - Interim report - Housing supply regulation*.

My comments are directed to the reform directions 2.1 and 2.5 (Pages 7 and 8). See sections below that relate to heritage controls. I can provide a short submission based on the short timelines but I'm happy to expand if asked to present in person at a formal hearing.

I am a qualified Town Planner and Heritage Planner Practitioner based in Victoria with over 30 years of local government experience. My comments are supported by a Deakin Uni Thesis that I prepared in 1997 that I believe is still relevant today titled "*The implications of heritage listing and the effect on property valuations*".

The findings of the thesis concluded that "*heritage controls on a macro level does not affect property value*".

In general, I do support the broad concept of a benefit cost analysis (2.1), that also considers and includes matters such as:

- Level of heritage significance assessed against the *Burra Charter*;
- Thorough comparative analysis of heritage properties in the identified locality and municipality, targeted for increased density;
- Undertake an assessment of heritage properties against required housing density in areas deemed appropriate for higher degrees of development, considering a range of factors including housing diversity, State initiated Planning Panel hearings, Council Heritage Plans, etc.

In my professional capacity I have led the Councils heritage program to include heritage precinct areas with a heritage overlay in the planning scheme. As time as moved on and we witness the housing shortage/affordability crises, it has made me reconsider in some capacity should these precinct areas be re assessed? The answer is Yes but at the same time it is important to include housing diversity, sense of place, architectural merit and not live in some un cohesive society where everything is the same. How would the public feel if the urban area contained only high-rise apartments??

Would this spread the population base out of Melbourne into Regional Centres and/or smaller towns areas and increase housing costs. There are so many variables to this argument.

Should you seek to hear this submission made further please contact me on [Redacted] or email [Redacted].

Yours Sincerely

Kevin Krastins

Heritage Practitioner



Reform direction 2.1

Allow up to 3-storey developments across most residential land

State and territory governments should allow up to 3-storey developments across all residential land, with exceptions made for areas with environmental protection, hazard-related overlays or heritage listed buildings only where the benefits of exceptions outweigh the costs.



Reform direction 2.5

Review, reduce and remove land-use controls that reduce commercial feasibility and do not adhere to best practice principles

State, territory and local governments should identify and reduce controls that reduce commercial feasibility and do not adhere to best practice principles.

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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.

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.