

PRODUCTIVITY COMMISSION

Housing Supply Regulation – Interim Report, July 2026

Submission from an ACT Heritage Precinct Resident

As a resident of one of Canberra's oldest suburbs, I welcome the opportunity to comment on the Productivity Commission's *Housing Supply Regulation – Interim Report*.

Most Canberrans support increasing housing supply and improving the efficiency and predictability of planning systems. However, one questions whether weakening heritage protection is an appropriate or sufficiently evidenced means of achieving this objective.

My concern is particularly strong in Canberra's heritage precincts, where important aspects of the national capital's early planning, architecture, landscape and social history survive in a remarkably concentrated form.

The key question is not whether heritage controls can constrain development. They can. The question is whether weakening them would produce enough additional housing to justify the permanent loss of heritage places and precincts. The Interim Report has not yet demonstrated this.

Heritage and housing supply must be considered together

The Interim Report itself recognises that a well-functioning planning system must balance economic, social, cultural and environmental outcomes and consider both current and future residents.

This is particularly important for heritage precincts because the consequences are often irreversible. Once an historic house, streetscape, garden, mature tree or landscape setting is destroyed, its heritage value cannot simply be recreated.

The Commission should therefore require clear evidence that weakening heritage protection would produce substantial additional housing before recommending such a change.

Canberra's heritage precincts are not generic "heritage overlays"

The evidence in the Interim Report draws substantially on Melbourne and other jurisdictions. While this may demonstrate that heritage controls can affect development patterns, it does not establish that weakening protection in Canberra would generate significant additional housing or that the benefits would outweigh the heritage values lost.

The Kingston/Griffith and Barton Garden City precincts are particularly distinctive. Their significance lies not simply in individual old buildings but in the relationship between houses, blocks, streets, verges, hedges, trees, gardens, open space and the original subdivision pattern.

The Barton precinct demonstrates early Garden City planning and retains significant original housing, infrastructure and mature public and private treescape. The Kingston/Griffith

precinct similarly reflects the development of housing associated with the establishment of the national capital.

These are therefore **precincts whose significance depends on the whole**, not merely collections of individually significant buildings.

Replacing precinct protection with individual listings could consequently destroy the very qualities for which the precincts are valued.

Canberra's national-capital history deserves particular weight

Canberra was deliberately planned as Australia's national capital, incorporating Garden City and City Beautiful principles.

Kingston and Barton are surviving physical evidence of those planning ideals. Their significance therefore extends beyond the interests of individual property owners or local residents. The progressive loss of houses, gardens, mature trees, verges and streetscapes would diminish the remaining physical evidence of how Australia's capital was conceived and built.

This national-capital dimension should be explicitly considered in any assessment of the costs and benefits of changing heritage controls.

Heritage also contributes to housing choice and environmental amenity

Housing supply should not be measured simply by the number of dwellings that could theoretically be accommodated on existing sites.

Kingston and Barton already contain substantial higher-density development. Their remaining Garden City Heritage areas provide a different form of housing and neighbourhood environment and therefore contribute to **housing diversity and choice**.

They also provide mature trees, gardens, hedges and open space that contribute to Canberra's landscape character, environmental amenity and urban cooling. These values are part of the precincts' heritage significance rather than incidental benefits.

A development may retain one or two historic buildings while progressively removing the gardens, trees, setbacks and streetscape that give the precinct its character.

Additional development capacity does not necessarily mean additional housing

The Commission appropriately distinguishes between theoretical development capacity and housing that is commercially feasible. The same distinction should apply to heritage reform.

Removing a heritage control does not guarantee additional dwellings. A site might instead be redeveloped with a replacement dwelling, a larger dwelling, or a development whose timing and scale are determined by market and financial considerations.

The relevant question is therefore:

How many genuinely additional dwellings would weakening a particular heritage control actually deliver, in what timeframe, and at what cost in heritage value?

That evidence should precede any reduction in protection.

The cumulative effect matters

Heritage loss rarely occurs through one decision. It can occur incrementally:

- one house replaced;
- one garden lost;
- one mature tree removed;
- one hedge or setback altered; and
- one block redeveloped.

Each change may appear minor, but collectively these changes can permanently transform a precinct.

This is why heritage needs to be assessed at the **precinct and landscape level**, rather than solely through individual development applications.

An ACT-specific assessment is essential

Before recommending reduced heritage protection, the Commission should undertake an ACT-specific analysis addressing:

1. how many additional dwellings could realistically be delivered if particular heritage controls were removed;
2. how quickly that housing could be delivered;
3. how much would constitute genuinely additional housing rather than replacement development;
4. the likely effect on housing diversity and choice;
5. the loss of heritage, landscape, mature trees and environmental amenity;
6. the cumulative effect of incremental redevelopment; and
7. whether comparable housing supply could be achieved elsewhere without irreversible heritage loss.

Evidence from other cities should not be assumed to apply directly to Canberra's distinctive Garden City precincts.

Recommendations

Heritage precincts' residents support evidence-based review of heritage regulation. However, the objective should be **better heritage regulation, not simply less heritage regulation**.

The Productivity Commission should therefore:

- distinguish rigorously assessed heritage precincts from indiscriminate heritage controls;
- undertake ACT-specific analysis before recommending reduced protection;

- measure actual additional housing rather than theoretical development capacity;
- recognise housing diversity, landscape, tree canopy and environmental amenity as relevant public benefits;
- assess cumulative as well as individual impacts;
- recognise the irreversible nature of heritage loss; and
- identify opportunities for substantial additional housing where heritage values are not placed at comparable risk.

Conclusion

Canberra residents overwhelmingly support increasing housing supply and improving planning efficiency. However, **heritage protection should not be treated simply as unused housing capacity.**

Kingston and Barton occupy a relatively small part of Canberra, but their Garden City precincts preserve important evidence of the planning principles and social history behind the creation of Australia's national capital.

The Interim Report has not yet demonstrated that weakening protection of these precincts would produce enough additional housing to outweigh the permanent loss of their heritage, landscape, environmental and housing-diversity values.

The Commission should therefore require **ACT-specific evidence of substantial and timely additional housing** before recommending any weakening of precinct-based heritage protection.

Protecting these areas is not an impediment to housing supply. It preserves **housing choice, landscape character, environmental amenity and the historical identity of Australia's National Capital for future generations.**