



REID RESIDENTS' ASSOCIATION INC.

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Thank you for the opportunity to comment on the Australian Government's Productivity Commission Interim Report on housing supply regulation from the Reid Residents' Association ¹(RRA).

About Reid and the Reid Residents' Association

The Reid Housing Precinct (RHP)² is officially protected on the ACT Heritage Register and was previously listed, in 1980, on the Register of the National Estate (now archived).

It is one of few relatively intact examples of 'garden city' planning. 'Garden City' planning, in combination with American 'City Beautiful' principles, underpinned the initial planning of Canberra. The philosophy behind Garden City planning was to create healthy working and living environments for urban residents. Built between 1926 and 1927 to house public servants relocating to Canberra ahead of the opening of the provisional Parliament House, it features low-density housing, uniform front setbacks and wide, tree-lined verges. The large trees mean that it registers as about 3 degrees cooler in summer than other Canberra suburbs³.

The Reid Residents' Association is a volunteer, not-for-profit residents' association formed in 1944 to foster an appreciation of the Reid environment, support the welfare of the Reid community and the RHP.

Comments on the Interim Report

1. This report is disappointingly limited

As acknowledged by the Productivity Commission, 'under the terms of reference, the interim report will be limited in scope' and thus 'many of the potential reasons for the decline in housing construction productivity are not in the terms of reference for this inquiry'. Also not included, are broader policy settings e.g. lending rules, interest rate settings, taxes, levies, capital gains tax and negative gearing; or broader economic condition that affect supply chains, cost of building materials, crowding out of investment in new housing due to competition with infrastructure projects; or the reasons for increased demand e.g. immigration and demographic change.

We are told that the Productivity Commission has examined a range of these things in other reports.

It begins to feel a bit like looking through a keyhole: the Productivity Commission is confined to delivering a report that will be sadly lacking, but useful politically,

¹ Reid Residents' Association Inc. <https://www.reid.northcanberra.org.au/>

² Reid Housing Precinct https://www.act.gov.au/__data/assets/pdf_file/0010/148474/reid-housing-precinct-entry-to-the-heritage-register.pdf

³ Meyers, J. et al. 2017 CSIRO *Mapping surface urban heat in Canberra* p. 28

because it has been asked to ignore the entire layout, context and depth of a problem.

2. *There is a shift in language: want vs need*

In the Terms of Reference, the Treasurer writes that: 'We do not have enough homes, where people need them, at prices they can afford'. Yet the first of the Commission's Key Points states that: 'Australia doesn't build enough homes in the areas where people want to live'.

There is a vast difference between need (essential) and want (desire).

What most Australian's want, according to the Australian Housing and Urban Research Institute (AHURI), is to own a detached, three-to-four-bedroom standalone house.

Yet, the Commission's report proposes a reduction in regulations to allow for higher density, apartment living; with a relaxed approach to minimum floor-space, the provision of car-parking, set-backs and greenery. Heritage would be dismissed in the main and local knowledge, as applied by elected Councils, would be over-ridden.

It is hard to judge what the long-term impacts will be. Perhaps, as Joni Mitchell sang, 'we won't know what we've got 'til it's gone'. This applies particularly to heritage, so once unique places like the Reid Housing Precinct has gone it has gone forever, lost to future generations.

3. *The interim report argues for a reduction in heritage*

The report uses statistics cleverly to imply that heritage overlays are impacting badly on affordable housing supply in areas where Australians want to live.

On page 7, the report states 'For example, heritage protections cover at least 50% of residential land in 50 suburbs across greater Sydney (NSW PEC 2024b, p. 42)'. While this may be true (we couldn't find the relevant document to check) a Google search reported that there are 658 suburbs in Greater Sydney. So, another way of reporting this could be that heritage protections cover at least 50% of residential land in 7.6% of suburbs across Greater Sydney. This would seem a fairer way of putting it. Also, it is likely that some of those heritage overlays are buildings of state, if not national, significance so hardly likely to be sites for affordable housing.

The report, because it is limited in scope, doesn't address the issue of whether building higher density apartments in older, heritage areas will create affordable housing. The Australian Financial Review (9 September, 2026) reported that, in Double Bay, high land and building costs will push new apartments to luxury prices of around \$3 million. Add to this the reality is that that builders want high profits and will build luxury apartments rather than cheap homes in these areas. So, removing a heritage overlay is not to benefit those these Reform Directions are aimed at assisting.

However, we should consider the benefits of heritage. The Australia: State of the Environment Report 2021 (found at <https://soe.dcceew.gov.au/heritage/environment/historic-heritage>) reported that:

Australia's historic heritage is important, as the physical evidence of Australia's more recent human history often provides otherwise unobtainable information about the past. It includes iconic features, places and landscapes that help define Australia, and it provides an important sense of place and connection. Historic heritage can also have aesthetic value. By contributing to social values and the character of area in which we live, work and recreate, historic heritage can contribute to individual and community wellbeing. Historic heritage can also generate economic benefits through tourism and re-use, although such use requires a well-managed and sustainable approach.

In 1979, the Burra Charter was adopted by the Australian National Committee of International Council on Monuments and Sites (ICOMOS). This charter provides guidance for the identification, conservation and management of places with cultural heritage significance. Cultural heritage significance means a place with aesthetic, historic, scientific, social or spiritual value for past, present or future generations.

Experts, led by David Yencken 4AO (deceased) and Max Bourke 5AM, shaped the decision-making for entering these original Canberra dwelling on the Register of the National Estate. This also included genuine consultation with owners of the respective dwellings. Following the adoption of subsidiarity policies and ACT self-government, these precincts including the RHP, are listed now on the ACT Government's Heritage Register, again after consulting with the residents of the original dwellings. We strongly recommend the PC consults the communities involved. Legislation and or regulation requires, in a democracy, sound, genuine consultation and effective engagement with the proposed changes to heritage areas.

As previously mentioned, these early suburbs were built according to Garden City principles but were adapted by John Sulman to the Australian environment. His influence made habitation/liveability for those early residents much easier, and Henry Maitland Roland implemented these ideas. This was a highly significant accomplishment and the liveability remains as most of these houses are still standing albeit reaching 100 years of age, often extended and utilising various adaptive reuse practices.

Removing the various heritage listings of Canberra's heritage listed precincts would lose the history of the development of Canberra's inner northern and southern suburbs. These historic heritage precincts were built to house construction workers, tradesmen and public servants. Each precinct signifies the various levels of occupation ranging from skilled trades to senior public servants and 'the whole is greater than the sum of the parts' as each precinct is distinctive with the RHP built to house middle-ranking public servants.

The precincts are unique representing the capacity for a relatively new Federal Government to manage and complete successfully the construction of dwellings to house people who were to manage the administration of government and sustain the construction of the national capital – a 'significant moment in time' likely never to be repeated.

⁴ Yencken, D. 2019 *Valuing Australia's National Heritage*, Future Leaders, Sydney

⁵ Bourke, M. <https://whc.unesco.org/en/oralarchives/max-bourke/> in 1980

Heritage-listed housing precincts signify both tangible history, specifically related to the Federation of Australia, and the history of the establishment of early Canberra, the national capital, as well the many related intangible cultural and socio-values. The conservation of historic heritage benefits future generations via education and experiencing the reality of in Canberra's heritage precincts: their bricks and mortar, tiles, buildings and trees (acknowledging Charles Weston's magnificent plantings⁶) design and streetscapes and those Australian versions of C20th 'Garden City' planned subdivisions.

Heritage is important for many reasons. While it may be difficult to assess the commercial value of heritage: be that as a premium on property (estimated at about 12% higher value⁷) or commerce as tourists come to explore, there are other less tangible impacts. The DCCEEW.gov.au website captures it thus:

Heritage includes places, values, traditions, events and experiences that capture where we've come from, where we are now and gives context to where we are headed as a community. Our heritage gives us understanding and conveys the stories of our development as a nation, our spirit and ingenuity, and our unique, living landscapes. Heritage is an inheritance that helps define our future. By identifying, protecting and managing our heritage we are conserving a valuable asset and ensuring that those places will continue to be experienced and enjoyed by future generations.

While it isn't easy to quantify these sociocultural benefits, they are nonetheless important. Carl Sagan's famous quote 'absence of evidence is not evidence of absence' is probably anathema to the Productivity Commission, but worth remembering particularly in the context of a narrow, rushed inquiry such as this.

Heritage significance isn't handed out lightly. These sites have been assessed as significant and this should stand. The benefits of keeping these sites far outweigh the benefits of development.

Upzoning by inserting 3-storey 'candlestick buildings' along streetscapes like those in the RHP will:

- degrade these areas by completely obliterating the structure, amenity, socio-cultural values and incur increasing urban heat levels.
- be very expensive not just because of ever rising construction costs but because their proximity to central Canberra has valorised areas such as these housing precincts, particularly the northern precincts and this has resulted in steep rises in the cost of land. Loss of social housing high rise along Cooyong Street and Northbourne Avenue has also added to the situation.
- if adopted, be unlikely to provide a significant amount of housing as the land available has, in many cases, had granny flats and extensions built, a common adaptive use practice. In most cases these extensions etc. have been done well and are in sympathy with the streetscapes. These inclusions yield a far better outcome.

⁶ Macklin R. & Gray, J. 2025 The Man Who Planted Canberra: Charles Weston and His Three Million Trees, National Library of Australia, Canberra
Robert Macklin, with John Gray

⁷ https://www.act.gov.au/__data/assets/pdf_file/0004/2607808/debunking-the-myths-of-heritage-listing.pdf

Once degraded or removed the loss of historic heritage areas like these heritage precincts is permanent and the associated socio-cultural values diminished. Online representations are simply inadequate!

There is no need to support a voracious Building Industry when there were 1,043,776 houses unoccupied according to the ABS 2021 Census⁸. While Australian Housing and Urban Research Institute⁹ has given numerous reasons to account for this number, they do make a useful recommendation i.e. penalising restrictive practices such as land banking (that) can improve the number of dwellings available for sale or rent based on Victoria's Vacant Residential Land tax. Perhaps this could be bought in for the ACT as well.

4. Regulation

While some regulation is necessary to ensure the safety, quality and liveability of new housing stock, too much or unnecessary regulation constrains housing supply.

This statement does not reflect of the reality of recent building issues. There is abundant evidence demonstrating what happens when regulations are not followed and not enforced in Canberra. For example, please see reports/articles that have exposed these issues:

- Levinson B, 2023 *Projects impacted by PBS Building collapse detailed in administrator's report*, 'The Canberra Times'
www.canberratimes.com.au/story/8255423/full-list-of-projects-impacted-by-pbs-building-collapse/
- Jervis-Bardy D, 2019 'Scarred by the experience' 'The Canberra Times'
www.canberratimes.com.au/story/6002351/scarred-by-the-experience-act-building-nightmares-revealed/
- Stefanovic S, 2019 *ACT building nightmares revealed; 'Canberra is in the midst of a building defect crisis'*, Architecture & Design
www.architectureanddesign.com.au/editorial/industry-news/canberra-building-defect-crisis

Regulations are safeguards against unsafe shoddy building practices. They most certainly are there to ensure exactly the safety, quality and liveability of new housing stock and it would appear that regulations actually need to be reinforced.

Regulations proposing the degrading of these areas should first require jurisdictions to engage genuinely with the residents involved as to how best to increase housing density without damaging the acknowledged heritage significant values in these precincts.

5. Reduced set-backs and tree canopies

It is important to look at the very long-term impact of these suggested changes to planning regulation. A reduction in tree canopy, as set-backs are relaxed, will impact climate.

A study by the RMIT Sustainability and Urban Planning program found that removing tree canopy cover can make cities 4 to 10 degrees hotter than surrounding areas. Reid is about 3 degrees cooler than the new, high-density suburbs in Canberra, suburbs that don't have enough set-back for large street trees to be planted.

⁸ <https://www.abs.gov.au/media-centre/media-releases/2021-census-count-includes-australians-living-wheels-and-water-most-us-still-firmly-land>

⁹ <https://www.ahuri.edu.au/analysis/brief/are-there-1-million-empty-homes-and-13-million-unused-bedrooms>

The RMIT study also found that ‘Trees not only provide shade, they retain some of the moisture in the environment, improve people's mental health and lower energy use. But despite their necessity, significant amounts of vegetation have been lost over the past decade to make way for new building developments’.¹⁰

The results¹¹ showed layered vegetation – where trees are combined with shrubs and ground cover – often cooled cities more effectively than trees alone ... These findings matter because urban greening is no longer just about aesthetics. As cities spend billions adapting to extreme heat, planting design may matter as much as planting quantity.¹²

6. *Information Request 1: What impact would reducing the coverage of heritage overlays have on housing supply?*

Assessing the number of available spacious backyards with the intent to insert 3-storey buildings would need to be calculated accurately by surveyors. As mentioned previously because of granny flats etc. it is most likely that the numbers will not go far in solving even one iota of what is termed ‘the housing crisis’.

In the ABS 2021 Census, statistics show that the largest of the heritage precincts in the suburb of Reid already has a variety of what is termed mixed housing i.e. ‘other dwelling types that comprise 63.3% compared with 36.2% of detached houses:

- Detached (Separate) Houses: ~36.2% of total dwellings (approx. 327 houses).
- Other Dwelling Types: The remaining dwellings consisted of 22.0% semi-detached, row, or terrace houses, and 41.3% flats, units, or apartments.
- Total Dwellings: 905.

For the most, owners of dwellings in these precincts are there because they have deliberately chosen the area, paid off mortgages, and continue to pay high rates for pleasure of living there. Many would have known that most of these dwellings were on the ACT Government Heritage Register. The legalities are there and should require appropriate administrative steps to remove such legalities as well as a process of genuine consultation **before** reducing the coverage of heritage overlays.

7. *Information request 2: We are particularly interested in quantitative evidence on reforms to minimum lot size and reducing coverage of broad heritage controls.*

Regarding cost-benefit analysis (CBA) it would be appropriate to investigate how to assess history, heritage and their intrinsic sociocultural values. It would be hoped that the PC recognises that ‘conceptualization and measurement of socio-cultural values is complicated’? Prior to the interim report was the PC able to identify the following questions as cited by DelBene et al. 2025¹³ in relation to heritage? Certainly, scientists are attempting to measure such vital elements by

¹⁰ <https://www.abc.net.au/news/2024-10-27/urban-heat-islands-hottest-summer-on-record-cooling-cities/104477994>.

¹¹ https://link.springer.com/chapter/10.1007/978-981-95-5487-4_6

¹² <https://findanexpert.unimelb.edu.au/news/153267-trees-and-greenery-can-cool-cities-by-as-much-as-18c—but-only-if-they're-the-right-type>

¹³ Delbene, James A, Clement, Sarah , Shellock, Rebecca, van Putten, Ingrid E, Cvitanovic, Christopher and Martin, Carol L (2025) *Conceptualizing and measuring socio-cultural values in marine and coastal environments: progress and research needs from a systematic map* Ecosystems and People, 21 (1)

‘[C]onceptualizing and measuring socio-cultural values in marine and coastal environments’:

This work poses the following:

- (1) where socio-cultural research has been undertaken,
- (2) how socio-cultural values are conceptualised,
- (3) how are the main types of socio-cultural values measured,
- (4) what methods can be used to measure socio-cultural values,
- (5) whose socio-cultural values have been measured (i.e. specific populations, groups, sectors), and
- 6) recommendations for future research and practice.

Perhaps these elements are too intricate for this report, or perhaps the report would rather not take such matters into consideration given its precepts.

Cost-benefit analysis re Heritage Precincts

It would appear that analysis of how to put a monetary value on the following productivities is definitely difficult when considering how to address the following:

- appreciation of heritage places by millions of people?
- tourism of thousands of people who visit heritage places and precincts like Canberra?
- thousands of volunteers (worth at approximately \$50 per hour) who support heritage places?
- the heritage industry as a component of the arts, sciences, architecture, skilled trades and entertainment?
- adaptive reuse by owners of heritage precinct dwellings?
- the cooling effect on those heritage precincts that, like Reid, have excellent streetscapes of mature-canopied trees¹⁴ as evidenced by the CSIRO assessment of surface urban heat in Canberra?

It would be useful to provide evidence if you have been able, to address these monetary benefits of heritage places and precincts. However, while a useful tool for some aspects of government decision making, historic heritage and socio-cultural values would appear to elude the regimen of CBA.

Decisions based on CBA such as delisting buildings and reducing neighbourhood character restrictions reduces the possibility that conservation today of historic heritage ‘provides benefits to future generations, an important premise for historic heritage conservation¹⁵’, thus lost and gone forever. Any such destruction would be based on multiple false premises.

Summary

The community lives with the impact of poor development for a very long time, if not forever. The Commission’s interim report doesn’t consider many of the things that Australians say are important to them. It can’t because of the limitations of the Terms of Reference.

¹⁴ Meyers J *Mapping surface urban heat in Canberra* p. 28,
<https://publications.csiro.au/publications/publication/Plcsirop178961>

¹⁵ Australian Government, Department of the Environment and Heritage Submission to the Productivity Commission Inquiry into the Policy Framework and Incentives for the Conservation of Australia’s Historic Built Heritage Places, p. 53)

So, there is no consideration of the impact of these changes on society beyond the meeting of housing build targets. Most of us want to live in a beautiful, natural, social and culturally rich environment because it makes us happy and it makes us healthier. Heritage helps with this as do good planning regulations.

As Alan Kohler wrote: 'Maybe housing developers should be required to live in what they build'¹⁶. We might then get desirable planning outcomes.

We endorse the conclusions and recommendations of the following submissions:

Australian Council of National Trusts

National Trust (ACT)

North Canberra Community Council

Yours faithfully

Marianne

Marianne Albury-Colless

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¹⁶ . <https://www.abc.net.au/news/2026-09-07/bathla-collapse-affordable-housing-quality-issues/107117958>