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Submission to Productivity Commission

Housing Supply Regulation: Interim Report

From: Collingwood Historical Society

The Collingwood Historical Society has had an active involvement in the heritage planning for the City of Yarra in inner Melbourne and previously for the City of Collingwood (Collingwood, Abbotsford and Clifton Hill) over the past 40 years and has participated in a number of Council heritage review and advisory committees. We are deeply concerned that the historical and heritage value of the area be respected for the benefit of future generations.

Thank you for the opportunity to comment on the Interim Report. As an inner Melbourne group within the City of Yarra we are greatly concerned about the maintenance of our heritage buildings and streetscapes, but also of our area's heritage of providing low cost housing to those in need.

The main points we wish to raise relate to

- *The importance of protecting **heritage areas in Melbourne's inner suburbs***
- *For housing supply: the importance of increasing provision of **public housing***
- *The need for appropriate **enforcement of regulation** to protect heritage and ensure affordable housing.*

1 Heritage

The Report outlines: *Reform direction 2.5*

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

The Interim Report's Reform Direction 2.5 seems particularly inappropriate for our **inner area** of Melbourne which has large heritage areas identified. A tremendous amount of detailed work has been carried out over years to identify which of our local areas need strong heritage protection and which are available for large scale development. In the heritage overlays each address is already identified as significant, contributory or not contributory to the heritage precinct.

The **social value** of heritage is mentioned in passing in the report, but then seems to get lost in the cost-benefit analysis. While many aspects of costs change over time, once heritage buildings or streetscapes are lost they are gone for ever.

We have already seen various aspects of our built and natural heritage sacrificed in the name of development but this has not produced more affordable housing. It is crucial that any increase in housing in the inner suburbs includes affordable housing.

Our local heritage seems to be under threat from recent State Government introduced **Fast Track** approvals for large developments by-passing existing planning controls. Our heritage is also under threat from the Leader of the Opposition who has called for even greater **density** in Collingwood and Fitzroy rather than in electorates such as her own of Kew (see Appendix 1 below).

Population density: The importance of **location** rather than a one size fits all approach. While those in the more affluent middle suburbs would like to see all the increased population density pushed into the inner city areas, our inner area already has a high population density with its pressure on open space and infrastructure and its threat to heritage values.

2 Public Housing

The Report states: *'Increasing housing supply would help put downward pressure on prices and support more people to live in housing that meets their needs'*.

The Report make only one reference to public housing and few to social housing (Box 1.2)

The Report needs to consider the lack of affordable housing for those most in need, in particular the need to maintain and expand the role of public (as opposed to other social) housing in the inner suburbs. The priority social housing waiting list in Victoria currently has over 40,000 households in urgent need of low-cost housing.

3 Enforcement of regulation

There is a need for clear regulations – there have been many calls from developers and from local communities for clear regulations in Melbourne's planning scheme for **mandatory rather than permissive built form guidelines**. These have been undermined by the state government policy in the name of making it 'easy' for developers. We have seen many examples of regulations to protect heritage buildings being undermined.

Under Yarra Council policy, developers proposing more than 50 apartments should provide at least 10% 'affordable' apartment. This is not being enforced and at most developers buy their way out of the requirement.

An example of this is the development plans for **79-81 Victoria Parade Collingwood** (corner of Wellington Street). The Minister for Planning approved this development under the Fast Track system which denies Councils and residents a voice. She approved two buildings on the site: one 23 storeys and one 17 storeys. The 478 apartments would include no social housing. The Amendment c271yara she had just approved allowed for a 'preferred' maximum of 12 storeys. This development would further hide the heritage landmark of the former Victoria Distillery 21 Northumberland St.

<https://www.planning.vic.gov.au/planning-approvals/ministerial-permits-register/ministerial-permits/d79b4402-213a-f111-88b4-6045bdc38f94>

In response to the Interim Report's Information Requests

Information request 1.2

What features should government have in mind when evaluating reforms to move housing regulatory systems towards best practice

Heritage – once lost is gone for ever

Location – one size does not fit all either across states, or within cities or suburbs

Public Good – regulation to ensure affordable housing and create public housing

A liveable environment – which incorporates public open space, tree canopy and pedestrian-friendly streetscapes rather than sunless wind tunnels.

Are the best practice principles and the overarching objectives appropriate?

Looking at the wider picture, it seems inappropriate for the Report to assume growth is inevitable (there is considerable pressure to stem migration growth) and that growth is necessarily good (in a context of a finite world).

1 Adopt a 'build mindset'

It is often better to promote reuse and recycling, especially of heritage buildings

2. Only regulate where necessary

3. Coordinate with infrastructure

This seems essential

4. Keep the process simple

Clear mandatory controls are simpler than 'preferred' controls.

With any queries please contact Janet Taylor [Redacted].

Collingwood Historical Society

Appendix 1 Density

Density of population (2025):

Density of population (2025):		Total population in 2025
City of Yarra	5,190 persons per square km	101,356
Collingwood	7851	11384
Abbotsford	5145	10316
Clifton Hill	3908	7350
City of Boroondara	2968 persons per square km	178,601
Kew	2462	25,930

The Member for Kew sent this flyer to Kew residents in 2026:



JESS WILSON MP
LIBERAL MEMBER FOR KEW

LIBERAL VICTORIA

Dear Resident

Kew Junction planning changes and Leo's site update

Jacinta Allan and her Labor Government's new planning changes will see high-rise towers at Kew Junction of up to 16 storeys in the centre and 4-6 storeys in nearby residential streets. This area is already very busy and Labor has not considered the additional stress this will have on our roads.

At the same time, the Minister for Planning has approved a major redevelopment of the former Leo's supermarket site, featuring four towers - including one rising to 18 storeys.

I've spoken with many residents concerned about the impact this will have on our local community particularly when it comes to parking and an increase in traffic.

Unfortunately, Jacinta Allan recently visited Kew to announce her government's approval of the development, citing support from Boroondara Council.

Labor has removed locals from having a say on developments in our community.

If elected as your Premier, I will repeal these planning changes and restore genuine decision-making powers to local communities.

We need more housing but under my plan we will deliver more homes and more choice, building with communities, not over them.

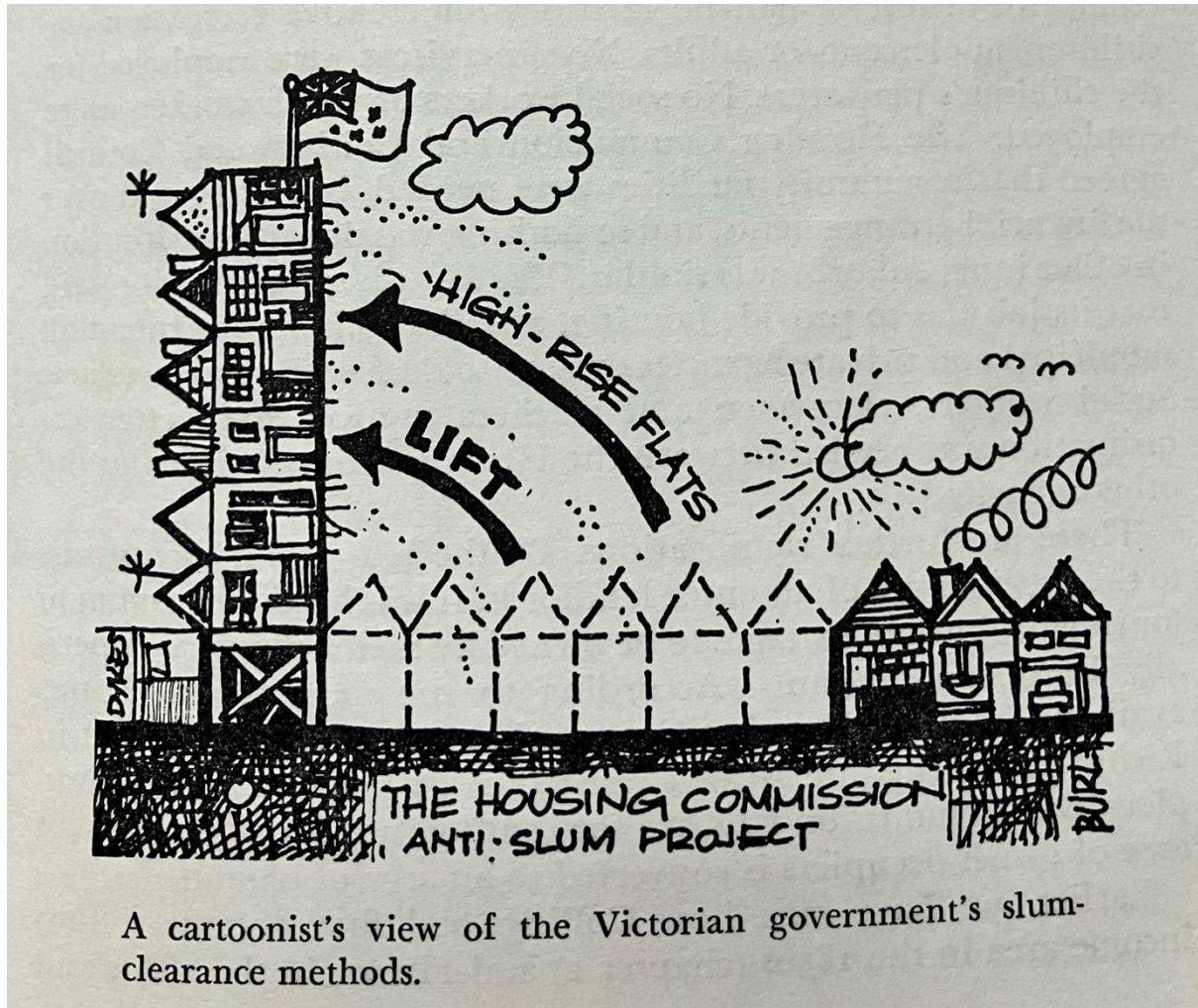
Under my approach:

- ✓ **Locals will have a genuine voice through consultation**
- ✓ **Density will be directed to appropriate locations, including expanding the Capital City Zone to areas like Collingwood and Fitzroy**
- ✗ **Planning will reflect local infrastructure capacity**

Appendix 2 Beware new slums

In the push to remove regulations to increase supply, beware of creating new slums.

(a 1969 cartoon from Barrett *The inner Suburbs*)



A cartoonist's view of the Victorian government's slum-clearance methods.