

Background

The National Trust of Australia (Queensland) (NTAQ) welcomes the opportunity to provide a submission to the Productivity Commission (PC) in response to the “Housing supply regulation Interim report” (the report).

Founded in 1963 as a member-based charity, NTAQ has evolved into a public company limited by guarantee. Today we have close to 20,000 members and manage a portfolio which includes several unique heritage properties across Queensland, ranging from the iconic Currumbin Wildlife Sanctuary in the southeast to Cooktown Museum in the far north.

The NTAQ understand that the Commission will undertake an inquiry to assess, identify best practice, and recommend reforms to get more homes built quickly across the following matters:

1. Approval processes (e.g., development, building, and post-approvals, including any barriers to the uptake of more productive methods of construction)
2. Availability and use of land for housing (e.g., land release, land use controls)
3. Processes and frameworks to deliver new and utilise existing housing infrastructure (e.g., growth infrastructure planning, developer contributions model)

NTAQ Response

The NTAQ understand that Australia has a housing supply shortage, and support investigations which seek to find ways of lifting productivity to help more homes to be built across the nation. Whilst we understand the need for the development of new housing, the NTAQ do not support the current reforms put forward in the report, as we do not believe they would have the desired outcomes.

The NTAQ wish to highlight the following, which we believe are essential considerations when looking into ways of effectively addressing housing supply shortages in Queensland, and across the country more broadly:

- A number of different references are made to ‘heritage’ throughout the report, including “heritage protections”, “heritage-listed buildings”, “heritage overlays” and “heritage controls”. A number of references are also made to places or areas of ‘character’ including, “neighbourhood character”, “character provisions”, “character protections”, “character overlays”, “character zones” and “local character”. Each of these terms mean something different, and function differently in terms of the way in which they restrict development, depending on the jurisdiction they are operating within. The NTAQ would encourage the PC to consider the way in which heritage protection processes operate at State and local levels, before considering a broad, nation-wide solution to housing shortages across the country.
- The NTAQ understand that one of the proposed reforms considers *replacing broad heritage protections with more targeted heritage listings with cost-benefit analysis and review processes. Blanket heritage areas would be replaced by heritage listings for specific buildings or small areas. Targeted heritage listings would be justified by cost-benefit analysis and there should be more robust mechanisms to review and delist buildings.* The

NTAQ would encourage the PC to consider how areas/overlays have a different purpose to individual heritage listings, just as “zones” versus “overlays” have different implications for future development within a certain town or city.

- The proposed reform also states that *restrictive overlays which apply blanket restrictions to entire streets or local government areas should be reviewed and replaced by targeted protections where possible*. In order to determine whether a place should be heritage listed or included as part of a heritage conservation area, previous studies would have already been undertaken to determine whether the significance of a place is understood in relation to other places (for example, along the same street, designed by the same architect, or built in the same era), or whether a place is significant in its own right and therefore warrants individual heritage listing. It is unnecessary to place pressure on State and local governments in particular to re-assess all places which are located within a heritage overlay/zone/area. The NTAQ understand that one of PC’s concerns is around timing, and take the position that current planning controls mean that there are lengthy approval processes for new buildings to be constructed. However, in undertaking unnecessary re-assessments of individual properties located within heritage/character area/zones/overlays, would this result in an increase in the amount of time for new houses being approved to be built?
- When considering housing supply shortages, the NTAQ would also stress the need for consideration to be given to the typology of our existing housing stock, and what is required to cater to our future communities.
 - For example, has consideration been given to whether the retrofitting of existing homes, or the adaptive re-use of existing buildings (such as former offices, factories or other structures) would help support an increase in housing supply?
 - Furthermore, have the PC looked into alternative solutions to the housing supply issue, such as (but not limited to): the subdivision of large lots, the addition of new storeys to existing buildings, the redesign of large houses into smaller, separated units/apartments?
- The report is limited to looking at how heritage controls and protections are constraining housing supply. However, the NTAQ would encourage the PC to consider other controls or mechanisms which constrain housing supply and limit the land available to build on.
- What the report has also not considered, which the NTAQ would encourage the PC to consider, is the relationship between lack of housing and the lack of qualified trades to undertake the work. Would land becoming available to build on mean that houses are built quicker, if we do not have a sufficient number of tradespeople needed to build effectively and efficiently in the first place?
- Has consideration been given to how to make homes more affordable to purchase, beyond looking at the relationship between heritage protections and the current housing stock? For example, has the PC considered how the price of building materials or trades could be reduced, in order to support the construction of more affordable homes? Furthermore, has the PC considered options to reduce costs of new development, including associated fees and charges, in order to stimulate the development of new, affordable dwellings?

- We would also stress that there is a need to consider what else is required in order to support an increase in the number of houses across the country and create functional cities which people enjoy living within. In particular, this includes, but is not limited to: necessary infrastructure, public transport and the education needs of local communities.
- Reform direction 2.1 within the report states that there should be an allowance for new development *across most residential land, with exceptions made for heritage listed buildings only where the benefits of exceptions outweigh the costs*. However, there is no information included within the report which details the parameters which will be used to determine whether, “the benefits outweigh the costs” and how this process would be governed.
- Reform direction 2.1 within the report also states that there should be an allowance for, *up to 3-storey developments across most residential land*. However, the NTAQ are concerned that this would not support the desired outcomes of the PC. In particular,
 - This may only provide a short-term solution for providing an increase in the number of homes. For example – once there has been an increase in up to three storey developments across the country (which would take many years to implement) how long before additional housing will be needed (based on forecasted population growth), which may involve consideration to be given to building 5+ storeys high within current residential land?
 - What governance structures would be in place to stop, for example, a single person knocking down their existing one storey house to build a three storey house, rather than rebuild a three storey apartment building?
 - Has the need for creating sustainable towns and cities been fully thought through by the PC? For instance – has consideration been given to the embodied energy within an existing building, versus the amount of fossil fuels and new materials required in order to knock the building down and build a new multi-storey structure in its place?

NTAQ look forward to assisting where possible to find ways to ensure that additional housing is provided for our local communities, whilst also ensuring the ongoing protection of significant heritage places and areas, alongside the development of future cities and communities which are dynamic, sustainable and are enjoyable to live within.