
National Trust Response to the Victorian Government Housing Statement

17 October 2023

Summary

Victoria has a rich, vibrant heritage represented by places, landscapes, stories, and people that make a vital contribution to our communities. Our heritage places contribute to our identity, creating a sense of place and representing the State's story, its people and its shared connections. Heritage conservation and the adaptive re-use of existing buildings is a powerful sustainable development tool, contributing to the mitigation of climate impacts and heritage is also a key economic driver for Victoria through development and tourism.

With the Andrew's Government recent [Housing Statement](#), and the sweeping reforms proposed, there is a clear risk that heritage could be left out of the conversation concerning increased housing stock and planning reform, where in fact heritage and our connections to place should be considered a crucial element and solution to many of the presenting problems.

The National Trust believes opportunities are being missed to ensure that heritage considerations are an integral part of the broader discussion about state planning policy and that state government policy on issues like housing, building construction, and sustainability do not conflict with heritage objectives. The existing issues with our planning system should not be exacerbated by a desire to speed through decisions to address the housing and economic crisis, which needs considered, evidence based and informed solutions applied.

While we acknowledge that the new framework for expedited permit decisions does not apply to properties with an existing Heritage Overlay, this does not address concern for significant places that have not yet been protected at the local level. The proposed resources to be poured into the fast tracking of planning permits should also account for the existing short comings in the planning system, which could see speedy decisions having irreversible consequences for our significant local cultural heritage.

Despite the potential for reuse, retrofitting, and restoration to provide both positive heritage and environmental outcomes, there are few incentives in place to encourage this. Indeed, the opposite is true—a culture of knock-down/re-build is being fostered by government policies which incentivise new construction. This may provide short term economic benefits; however, it is unsustainable, and is resulting in long-term environmental impacts, and adding to the destruction of heritage places valued by communities.

Heritage is not a barrier to change or combatting planning pressures, but when properly considered and integrated into planning processes, provides an opportunity for more thoughtful and innovative design solutions that protect what the community values and provide great places to live, work and play.

We call upon the government to include heritage in the conversation, and the impact on heritage with fast tracked approvals. We encourage incentives for meaningful incorporation of heritage building stock, landscapes and trees into development design, and ensure that councils and communities are meaningfully supported to be part of the decision making about change to their places.

Good decisions, made faster

We commend the government on their proposed approach to work with project proponents, Councils and referral authorities to understand and address the current backlog of housing applications. The state government should first be seeking to understand the reasons for the backlog in housing builds rather than immediately seeking to remove decision making powers from local Councils. Having a clearer understanding of why decisions keep lagging on these applications will ensure that future decision making around resourcing, policy and process changes are based on clear evidence of the real barriers to these developments. The National Trust requests that the government publicise the results of the investigations into the reasons behind the backlog and application delays, to provide the justification for any resulting proposed planning reforms.

The National Trust is concerned about the proposal for the Minister for Planning to take decision making powers away from Council in relation to significant residential developments that include affordable housing as we believe good planning decisions can only occur with local knowledge and accessible consultation for the local communities involved. We believe better planning decisions can be made by those directly connected with the local community and its issues, historically and on a regular basis. The community directly affected by the proposals will feel more comfortable engaging with issues around the proposal at a local level.

The National Trust therefore suggests that rather than taking decision making powers away from local government in these situations, the Victorian government should consider providing more resources at local planning level and establishing a support team at State Government level to provide additional support and expert guidance. This way the decision-making can stay at the local level while building capacity in State and local government to make better decisions faster.

Cheaper housing, closer to where you work

The National Trust supports the intention of the state government to keep making precincts about people and places. In the speed to build houses, we would like to ensure the importance of place is considered. It is therefore paramount that in any areas of unlocked land made available for new housing, significant heritage, environmental and cultural landscape values should be assessed and considered in establishing these places.

Sense of place should not be forgotten with streamlining planning processes for big housing builds. Incorporating cultural heritage values make great places to live, and this can only be achieved if planning decisions are being made through meaningful local consultation. The incorporation of shared values into the future of housing in Victoria will assist in making the government's efforts to address the housing crisis a success and enrich our state with places that address the needs of Victorians.

We also note the framework provides a large emphasis on new builds, however there should also be a focus on incentives for adaptive re-use and retrofitting of existing building stock as noted in the state government [Built Environment Climate Change Adaptation Action Plan 2022-2026](#). In line with this the National Trust also supports the proposed conversion of commercial office buildings to residential apartments.

More social housing

The National Trust has concerns with the proposed model for renewal of the 44 high-rise public housing towers across Melbourne. We are concerned by the displacement of people in the units from their existing supportive and close-knit communities through demolition of the towers prior to any rebuilding taking place. There is a high risk that in waiting for the new construction of public housing, many residents will not come back when it is finally completed. The currently proposed process for renewal of the towers would exacerbate existing pressure on the Victorian Housing waiting list and significantly reduce the state's housing stock before it creates more.



Through deeper investigation into options for infill and upgrading the existing towers, current occupants would have the agency to stay where they are already connected to place, be involved in the changes that are made to their homes, and remain within their supportive communities during the process. Furthermore, the National Trust has concerns with putting the construction of social housing into the hands of Developers who often have commercial rather than community considerations as their main incentive. How is the government going to ensure a collaborative and equitable approach to design if handing these sites over to Developers?

We urge the state government not to disregard options for retro fitting the existing buildings to meet current Design Standards, which is a more sustainable and economically viable outcome. Models that look to refurbish and infill the housing estates, such as suggested by OFFICE, would be cheaper and less disruptive for the occupants.

The majority of these towers are built from concrete, and the release of CO₂ with their demolition would be in direct conflict with the state's greenhouse gas emissions reduction targets. Furthermore, the loss of established green space around the towers through increased development would remove important environmental amenities and trees. No urban tree should be removed unnecessarily as we face the climate crisis. The environmental services that urban trees provide are essential to sustainable, viable and livable cities, especially in cities that face warmer temperatures and lower rainfall.

The National Trust calls on the government not to approach the prevalent issues with these towers with a knock down rebuilding mindset. The philosophy of the plan to demolish them and rebuild is unsustainable, both from a climate change and community wellbeing perspective. Rather than an immediate response to demolish and rebuild, options to retrofit and refurbish the towers must be meaningfully explored.

A long-term housing plan

The National Trust supports the government's intention to build a modern, fit for purpose planning scheme. However, this will require the Planning & Environment Act to be rewritten first. We therefore urge the State Government to complete the process started by the 2022 Victorian Parliamentary Inquiry into the planning framework.

In 2020, in response to an outpouring of community concerns with the planning system, the Planning and Environment Committee of the Legislative Council established a Parliamentary Inquiry into the adequacy of the state's planning laws, with a focus on heritage protection.

While the Inquiry received nearly 300 submissions, proposed public hearings were abandoned due to insufficient time remaining before the state election.

On 2 August 2022, Chair of the Committee, Sonja Terpstra MP, tabled an interim report in Parliament. The report paints a damning picture of the gaps in our planning system which are leading to the destruction of our heritage and trees, and green spaces, to the detriment of current and future generations.

The Committee made only one recommendation—that a full inquiry be undertaken at the beginning of the next parliament to ensure that the issues raised in the terms of reference can be given due consideration.

We urge the state government to support a full inquiry and consider the issues raised in submissions, such as that of the [National Trust](#).