



POLICY SUBMISSION

EIANZ Submission on environmental and heritage regulatory matters in relation to the Housing Supply Regulation Interim Report

28 September 2026

1. About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is the peak not-for-profit, multidisciplinary association of environmental practitioners across Australia and New Zealand. Our members include scientists, ecologists, planners, engineers, lawyers, economists, and policy specialists, many with direct experience in heritage and environmental assessments and approvals through State and Federal agencies.

This submission has been prepared by members of EIANZ's Ecology and Heritage Special interest Sections, reviewed by subject matter experts and approved by the EIANZ Board.

2.1 Discussion

Efficient Approvals

As EIANZ members are involved in the environmental approvals for housing developments we see first-hand the implications for not considering heritage and environmental protection in early planning; projects are delayed while these issues are resolved. We argue here that if these issues are considered during planning – not after the design is done – these would not be constraints but design considerations. This would expedite the approvals process as regulators and the community can see how these issues have been identified and any potential impacts mitigated.

EIANZ also supports faster and more predictable approval pathways, however, fast-track approval should not mean reduced environmental standards. Rather, best-practice requirements should be clearly established and incorporated into planning schemes, design standards and deemed-to-comply pathways from the outset. This would allow proponents to design compliant developments without repeatedly commissioning site-specific assessments for matters that can be addressed through

clear, evidence-based standards. The Commission's proposed fast-track approach already relies on codified requirements and reduced third-party assessment, making the quality of those underlying standards particularly important

Heritage Protection

With respect to the issues the Interim Report raises about heritage protection, we note that some of the issues raised echo matters from the 2006 Productivity Commission Inquiry Report into the Conservation of Australia's Historic Heritage Places (see particularly the observations in Section 11 of that document).

With respect to Reform Direction 2.4, and the issue of heritage overlays and conservation areas - residential conservation areas often derive their significance from the relationships between buildings, streets, landscapes, archaeological remains and communities. Protecting individual listings alone may not preserve this collective character. Reform must not undermine precinct-level protection or treat heritage as a series of isolated assets.

Some uncertainty identified in the Interim Report appears to arise not from heritage protection itself, but from lack of and/or outdated studies, incomplete records and limited monitoring after areas or places are listed. EIANZ supports strong heritage protection, underpinned by accurate, transparent and regularly reviewed information.

Regarding the suggestion in the Interim Report that there needs to be a greater consideration of economic costs when considering heritage listing, it is EIANZ's view that the costs of not considering these issues during planning stage are greater.

Any assessment of housing supply measures should balance the costs of heritage protection against the often-overlooked costs of heritage loss. Heritage places provide substantial economic, social and cultural benefits, many of which are not readily captured in traditional cost-benefit analyses. SGS Economics and Planning (2018) estimated that places on the Victorian Heritage Register generate a capitalised public value exceeding \$1.1 billion and annual benefits of more than \$40 million. Beyond these measurable benefits, the demolition of heritage places results in irreversible losses to cultural identity, place character and community wellbeing. Given that heritage assets cannot be recreated once destroyed, housing policy should recognise the principles of intergenerational equity and ensure that short-term development outcomes do not impose permanent costs on future generations.

We would welcome recommendations from the Commission to see these issues addressed via:

- A recommendation for the development and adoption of robust Heritage Conservation Area guidelines

- A recommendation that resources are directed by heritage regulators to ensure heritage guidelines, lists, areas and individual listings are subject to review, monitoring and reporting
- A recommendation that areas which have not been previously assessed for heritage protection are examined, to provide greater certainty to landowners, proponents and regulators
- Consultation with recognised heritage organisations in future consideration of this matter

Environmental protection

EIANZ supports medium- and higher-density development in appropriate urban locations. Well-planned infill can use existing transport and infrastructure more efficiently and reduce pressure for outward expansion. It must, however, address biodiversity, urban heat, noise, artificial light and cumulative impacts. The Commission itself recognises the importance of strategic planning and biodiversity mapping in areas identified for substantial housing growth.

Building more homes also brings additional roads, traffic, public spaces, infrastructure and outdoor lighting. The ecological consequences extend beyond the direct loss of vegetation: retained habitat can be affected by fragmentation, edge effects, artificial light and noise. The Australian Government's *National Light Pollution Guidelines for Wildlife* provide established best-practice measures such as avoiding lighting of habitat and ecological corridors, shielding luminaires, reducing light intensity and limiting unnecessary blue-rich light. EIANZ considers that these ecological lighting principles are not yet consistently embedded in planning and development requirements.

Rapidly developing areas such as Moreton Bay demonstrate why this is important. The City of Moreton Bay already recognises light spill and glare as environmental nuisance issues and its planning material identifies wildlife-sensitive lighting measures, while local development approvals have also incorporated fauna-sensitive lighting requirements. Rather than addressing these impacts inconsistently after development occurs, EIANZ recommends that best-practice lighting and noise requirements should be incorporated into standard development controls.

3. Conclusion

The Interim Report presents an opportunity to improve housing delivery by making regulation clearer, more consistent and better supported by strategic evidence. Environmental and heritage protections should be treated as part of good planning and long-term liveability, not as barriers to be removed.

EIANZ encourages the Commission to recommend reforms that improve regulatory capability, maintain robust protections and translate potential development capacity into well-located, resilient and liveable housing.

EIANZ would welcome the opportunity to discuss these recommendations further.

Contact Details

For further information, please contact:

Environment Institute of Australia and New Zealand

Email: office@eianz.org

Phone: +61 3 8593 4140

Web: www.eianz.org