

## Brief comments received

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1	Build non-bus public transport before the residential developments occur. Consider building in a way that reduces car dependency. Compromising risk management controls isn't acceptable. Additional infrastructure requirements are still important. Health and climate protections should be maintained.
2	Australia's housing challenge is not simply a supply problem. It is a delivery system problem. Capital, land, demand and manufacturing capacity already exist, yet housing outcomes remain constrained by fragmented approvals, procurement, infrastructure coordination and project delivery processes. Reform should focus on improving the conversion of policy, funding and approvals into completed homes through more coordinated delivery frameworks, standardised pathways and program-based approaches that increase housing throughput at scale.
3	From a life member of HIA and builder / in the construction and residential housing industry for 45 years . Need reforms to Taxation on Housing to be reduced not increase we need a brave government to reduce GST on housing, give the GST back to first home buyers over three years thru their person Tax returns (not inflationary) In 25 years with HIA there is not one single policy produced from all levels of government to reduce the cost of housing. Need regional trainers thru TAFE IN REGIONAL AREAS FOR SUB TRADES bricklayers tilers scaffolders etc At some point young people will realize that a trade is not a dirty word and AI can't take over the trade sector in Housing , even MMC requires a strong labour force. Review BIO diversity overlays in Regional areas and account for revegetation in suburbs that reestablish trees and greenery in most cases more significant than the brown field sites that developments start at. Make the sellers /land holders pay for the BIO diversity costs out of the sale of the land ,they are getting off scoff free with contributions of the BIO diversity credits required . The developers only pass these costs onto the consumers whereas the initial landowner who has made the decision to sell the land to the developers in the first place at over inflated prices takes 100% of the money with them and doesn't contribute a cent back to the BIO diversity fund. Encourage sovereignty of Australian manufacturers and disable with levies the flooding of dump products and substandard products on the Australian market. We are seeing this with windows and glazing markets imported masonry and AAC products, it seems we will go down the path of the fuel crisis and breaking of supply chains under external decisions from industry is very dangerous. The are a number of claims at ACCC at the moment from major manufactures in dumping on the market , and seems to take an extraordinary amount of time for a judgement , not sure even what a favorable decision looks like for the applicant in Australia Happy to expand further.
4	The number one issue government needs to address is inflation. Not just because it impacts the price of building materials, but because it impacts the price of everything, redcuig confidence and creating desperation. The number two issue government needs to address is the skyrocketing rental prices. A moratorium for two years - exactly as was done for the last crisis during COVID - would prevent rents continuing to rise, thereby putting a brake on inflation,

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	<p>but also providing some breathing space for renters who are arguably struggling the most. The number three issue the government needs to address is the "million vacant homes" identified during the 2011 Census, and the likelihood that most of these are being deliberately kept vacant as 'short term lets' under one or other of the online agencies (e.g. AirBnB and Stayz) [NB: This does not constitute a need to reduce the *hosted* BnBs, as the number of these has scarcely risen. Just 'whole house' rentals converted from long-term market rentals to short-term lets.] According to the recent reports this amounts to anywhere between 1% and 8% of total rentals in any given LGA across Australia. In my own research for the local Council in my own LGA I determined they were 4% of total rentals, which puts serious pressure on rent pricing, due to unavailability, higher demand and shortage of supply driving up rentals. If the short-term letting market were curbed, even slightly, many regions with extremely tight rental vacancy levels would see immediate easing and availability increases. And over time, reduction in rents overall. While this will probably be seen more as a "States rights" issue, National Cabinet perhaps should be discussing how this can be tackled. Homes withheld from the open market is NOT productive. Especially when rental vacancy rates are already unreasonably low. The number four issue government needs to tackle is its responsibility to build actual physical bricks and mortar homes. It is evidently clear from recent research that all levels of govt have abandoned their clear responsibility to actually build homes, and in so doing, provide not just homes for the poor or disadvantaged, but also to provide actual competition for developers. In the absence of this *actual* competition, it's clear developers and land bankers have been deliberately withholding land and/or completed homes from the open market in order to maximise prices and margins. Classic 'Capitalism 101', for sure, but not helpful for our population, who need cost-effective homes at affordable prices. Whilst providing only stocks of *unaffordable* homes, in dribs and drabs to meet the capacity to pay of cashed-up buyers, is great for developers margins, it doesn't help supply more affordable housing. One thing that could help achieve an increase in affordable homes would be for government - in conjunction with the States - to require the National Construction Code to provide an ancillary dwelling category specifically for what are called 'Tiny Homes', either 'on wheels', or not. Many of these are being built by desperate home buyers unable to afford anything else, and also by those choosing to downsize and declutter. Yet the industry and the regulators are in complete denial about this as a necessary addition to our housing stock. While many are being built at present utilising the caravan regulations, they are expressly NOT caravans - except in basic shape and having wheels under them. The issue with this approach (forced on builders by lack of ACTUAL regulations enabling and guiding such construction) is that the 'caravan rules' are at cross-purposes with the NCC dwelling rules. Some simple changes - such as enabling Tiny Homes *provided* they comply with NCC rules for ventilation, insulation, minimum floor to ceiling height, and glass area, would definitely help. And then people will CHOOSE to build Tiny Homes that WILL comply with State planning rules. A Tiny Home is NOT, repeat not, a caravan. They only *appear* to be such given the lack of ACTUAL rules and regs that could enable them to be built to an NCC regulation. For example, a THOW (Tiny Home on wheels) is built on a steel 'caravan type' chassis, with axles, brakes etc, in order to comply with *something*. Unfortunately, the highway codes and ADRs restrict the height of "caravans" to 4.3m, which makes it almost impossible to build a THOW with a "habitable mezzanine" due to the floor-to-ceiling height restrictions in the NCC. If this could be expanded, and specified, to 2.1m floor to ceiling - the minimum height in doorways under NCC rules - (for either main floor or mezzanine) then a THOW *could* be built to a taller maximum height, but of course would then NOT be able to be a caravan as per ADRs and highway regs. But *could* be an 'overheight' load. Especially if built on a normal steel frame and then simply hauled on a low loader as a 'load' not a free towing 'vehicle'. (i.e. built without axles and wheels of its own). The reason THOW are built as narrow as they are is to comply with the highway code maximum width of 255cm. Yet the highway regs allow 300cm maximum for the 'first step' in "Overwidth" rules, which requires only signage on the corners of the load and 'Overwidth' signage on the tow vehicle. So, potentially, Tiny Homes could be built on-site, or off site and hauled to</p>

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	<p>site on a standard truck trailer, to be craned onto site where they *could* provide an alternate, but much needed 'first step' into home ownership, or a downsize for older singles needing something smaller and more affordable. Please note that such a Tiny Home as I've described could be built as a DIY project, on site, for less than \$100K. It could alternately be built by a registered builder of such homes, hauled to site as a 'wide load' and installed with a crane between \$150K and \$200K. This is 20% of the cost of an average house in Australia. So very, very "affordable" even for those with limited means. And based on my research into those already living (often illegally) in such ancillary dwellings here and world-wide, a very fun, desirable and perfectly appropriate form of dwelling for a single person, a single parent, or a couple. Even small families can live in them comfortably, with the addition of decking and external additional storage, such as a small garden shed. If government is serious about making housing affordable, they should seek to make Tiny Homes legal, and buildable, and so provide an alternative to the 'studio apartments' people with less capital are often forced into. Note that a pretty standard Tiny Home could have an internal floor area of at least 33sqm - more than a 'studio apartment' - and with external decks and storage could even have a usable living area in excess of 50sqm - similar in area to a two bedroom apartment. While the HAFF is budgeting for \$550,000 for a single home, building Tiny Homes could easily quadruple the number of homes being built for the same outlay, and government would not need to spend a cent, as the homeowners would outlay the capital themselves. But banks would need to see Tiny Homes as a "legal dwelling" in order for finance to be amde available. At present it's only thjose with a wad of cash who can even afford to commission one. Hence why the NCC definitions need to be broadened to include Tiny Homes as a legitimate category of dwelling. You want MORE homes built? Enable the construction of ancillary dwellings, especially Tiny Homes. People will build what they can afford. And every couple or single household so served frees up another flat, or house, somewhere else, for a family that does not choose the Tiny Home lifestyle. It's what the corporates call a triple win. More housing, cheaper to build, and no cost to govt. Now THERE'S a slogan.... ;)</p>
5	<p>Submission to the Productivity Commission – Housing Supply Regulation Inquiry GTT is an advanced Australian prefabricated timber manufacturer based in Orange, NSW, operating Australia's largest automated timber prefabrication facility. We currently supply precision-engineered wall, floor and roof panel systems across multiple medium density housing sites in Greater Sydney and are actively engaged in large-scale residential delivery. Government procurement caps genuine supply capacity The most significant barrier GTT faces is not planning regulation — it is government procurement policy. Current frameworks are structurally biased toward piecemeal, project-by-project tendering that prevents manufacturers with genuine volume capacity from deploying it. GTT can manufacture and deliver at scale. Procurement rules prevent us from doing so. The result is slower delivery, higher cost, and underutilisation of the sovereign manufacturing capability the government says it wants to build. If the objective is 1.2 million homes, procurement must be redesigned to reward volume commitments and long-term pipeline certainty — not just lowest-cost single-project bids. The planning system is not the problem — capability is GTT operates across multiple NSW jurisdictions and consistently finds that the existing planning framework, while imperfect, is workable for experienced developers who understand it. The loudest complaints about regulatory burden often come from underprepared or inexperienced developers who misattribute their own capability gaps to systemic failure. The Commission should consider this carefully. Rather than further simplifying a system that competent operators navigate effectively, policy should create positive incentives for proven developers — faster pathways, priority assessment, preferred supplier status — that reward track record and delivery performance. This would create competitive pressure on underperforming developers to lift their standards rather than blaming the rules. Domestic prefabrication is being undermined by cheap imports Australian-manufactured prefabricated housing solutions offer demonstrably high quality, sovereign supply chain security, and genuine construction productivity gains. However, the segment is being damaged by low-quality imported prefab product that fails to meet</p>

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	community expectations and taints buyer and government confidence across the board. Policy should distinguish between genuine advanced manufacturing — certified, code-compliant, Australian-made — and imported product that does not meet the same standards. Procurement frameworks and government housing programs should explicitly favour sovereign, quality-assured supply.
6	<p>Australia's housing challenge is not only a shortage of dwellings. It is increasingly a shortage of places where people want to live and stay. Regulatory reform focused exclusively on speed and volume risks producing housing stock that generates its own long-term social and economic costs: neighbourhoods people leave when they can afford to, communities without identity, and dwellings that depreciate because they belong nowhere in particular. A more complete definition of productivity in housing must include durability, community cohesion, and the long-term value of place. [Redacted] have argued persuasively that the neighbourhood, not the dwelling unit, is the fundamental unit of a successful city, and that housing disconnected from local material culture, street life, and shared civic space produces places that people endure rather than love. This thinking is gaining significant traction internationally and is actively taught to a new generation of architects and urbanists through programs such as the INTBAU Utrecht Summer School. It deserves a place in Australia's housing reform conversation. A house built in Brisbane should not be indistinguishable from housing stock in Melbourne or Perth. Planning codes and procurement frameworks that default to generic construction methods, imported materials, and designs indistinguishable from housing stock anywhere in the country are not neutral. They actively undermine the long-term value of the communities they produce. Reform should instead create positive incentives for housing that reflects regional character, uses locally available materials, and draws on the knowledge of local tradespeople. One of the most practical reforms available is the creation of a comprehensive national residential pattern book: pre-approved dwelling designs organised by climate zone, lot type, and dwelling typology, qualifying automatically for code-assessed fast-track approval. This model already exists in the health sector through the Health Facility Guidelines, where pre-approved layouts are known to comply with relevant standards, can be built with available materials, and are familiar to local contractors. Applied to housing, it would dramatically reduce the design and documentation burden before lodgement, shorten assessment timelines, and make quality design accessible at the small-project and owner-builder scale. Critically, these designs should reflect regional character and specify locally available materials and construction methods rather than produce a new generation of placeless housing delivered faster. Chilean architect Alejandro Aravena's Elemental model, which delivers a well-designed structural shell for incremental completion by residents using local labour and materials, offers a compelling typology for inclusion in such a pattern book, particularly for government-supported housing. Regulatory settings should also actively encourage dwellings above commercial premises in established activity centres. Ground-floor retail and hospitality activates the street, creates walkable neighbourhood life, and supports shared public space, while upper-floor dwellings contribute density without requiring new greenfield infrastructure. Planning codes that separate residential and commercial uses, impose excessive car parking requirements, or restrict building heights in established centres are a direct barrier to this form of housing supply and should be reformed as a priority. The Commission should also consider recommending a national register of traditional and vernacular tradespeople: bricklayers, stonemasons, timber framers, lime plasterers, and other craft-based practitioners with place-specific skills. Paired with targeted apprenticeship grants, this register would make specialist local labour accessible to builders and designers, strengthen regional construction workforces, support the use of locally sourced materials, and generate sustained local economic activity. A house built by local tradespeople using local materials and methods they know well is also faster and cheaper to build than one dependent on imported supply chains and unfamiliar systems. This is a productivity argument as much as a cultural one. Finally, planning codes should actively support</p>

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	<p>shared spatial arrangements such as co-housing courtyards, community-scaled plazas, and mixed-tenure clusters that reduce long-term social infrastructure costs and produce the kind of neighbourhood life that makes people want to stay. The most liveable and economically resilient neighbourhoods in Australia, and internationally, are built around what people love about where they live, not just around the minimum required to occupy a dwelling. In summary, this submission recommends: - A national residential pattern book with fast-track approval pathways, designed to reflect regional character and specify locally available materials and methods - Reform of planning codes to actively encourage and streamline mixed-use dwellings above commercial premises in established activity centres - A national register of traditional and vernacular tradespeople, paired with apprenticeship and mentorship grants - Planning code recognition and support for co-housing, shared courtyard, and community-activated spatial arrangements - A publicly accessible architectural design review and advice service at the small-project scale, to improve design quality before lodgement and reduce downstream approval burden</p>
7	<p>I have a gardening and landscaping company in Sydney that services the higher end of the market. I employ a staff of 6-8 people. I pay my team above award wages so that I can keep my staff committed to the business. Over the last few years I have really tried to develop myself in terms of financial education and stay ahead of the costs of running the business. For last few years in I have felt particularly suffocated by the amount of money that I constantly pay in Tax (usually around \$5-\$7K a month IAS) and then Super, Workers comp, Insurances just keeps going up faster than I can put my rates up. I recently put my hrly rate for general maintenance up to \$90 plus GST (from \$80 plus) because it was essential but after further financial analysis it really needs to be between \$110-\$120 which is too much of an ask for existing clients to pay. It would be extremely helpful if there was a 20% reduction in the monthly tax payment. I would have more resources to grow the business and have the capacity to make “bigger moves” including hiring more people and buying more equipment. Currently it feels in this country like the productive people are being penalised and the government is being forced to squeeze us further as more irresponsible fiscal policy is implemented. We went from a balanced budget in the early 2000s and I can’t understand why I have to be very careful about how I manage money in my business for it to keep going but the government doesn’t have to. The government should run their finances like a business (even if that means having to make unpopular decisions) so that we as a country are living in reality of what we can and can’t do. I say this because I know that moves like borrowing more and printing more money are just going to wind up with myself and my son paying more “down the road”, we are already seeing this trend across the west broadly. I can admit that the infrastructure in this country is amazing and the government has done a wonderful job of keeping Australia beautiful and running well, I would just like some REAL breathing room and incentives for small businesses to prosper. Thank you for your time and attention.</p>
8	<p>Australia's housing shortage is often discussed as a problem of insufficient land supply, restrictive zoning or inadequate infrastructure. While these issues are important, my experience suggests that significant housing supply gains could be achieved by improving the administration of the planning system itself. One of the most significant shortcomings in the current system is the way success is measured. Planning performance is often assessed through determination statistics, assessment timeframes and appeal rates. While these are useful indicators, they do not capture the housing that is never built.</p>

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	<p>Governments should seek to better understand how many projects are abandoned, reduced in scale or rendered unviable due to regulatory burden, uncertainty and delay. The housing that is never built rarely appears in official statistics, yet it may represent one of the most significant consequences of an inefficient planning system. Future planning reforms should focus not only on measuring process efficiency, but also on measuring housing outcomes. The key question should not simply be how many applications were processed, but how many homes were ultimately delivered. Planning authorities should be encouraged to work collaboratively with applicants, provide clear guidance, focus on practical solutions and adopt more standardised assessment pathways where risks can be effectively managed. A planning system that delivers certainty, transparency, accountability and timely decision-making would reduce costs, improve productivity and enable more homes to be delivered more quickly while maintaining appropriate environmental protections, infrastructure standards and community safety outcomes. Ultimately, the success of Australia's planning system should be judged not by how effectively it manages paperwork, but by how effectively it facilitates the delivery of safe, sustainable and well-located housing for current and future generations.</p>
9	<p>The Brisbane City Plan 2014 is enormous, resulting in a warning when you try and download it. While land may be 'zoned' to allow housing development, there are significant constraints on what can be built across the city (no townhomes, no 3 storey houses (preventing inter generational homes) in low density areas etc) especially once a development approval is required. More types of development should be 'accepted development'. Many people need to seek town planning advice and obtain consultancy reports (bushfire, stormwater, ecology, civil) to add even an extension to their homes. Council planning officers often impose significant costly development conditions on approvals too - an approval isn't worth much if you can't then afford to undertake the development. These conditions can seem reasonable in isolation (protect tree, undertake earthworks in specified manner) but can add hundreds of thousands in compliance costs. This is particularly problematic for families trying to subdivide or build a second dwelling - it's only possible if you are a developer and doing it as a business enterprise.</p>
10	<p>Allow tiny homes widely in Bega Shire (&amp; every shire!) as long as they can show responsible water and sewerage management.</p>
11	<p>Our family's 2024 - 2025 DA experience with the [Redacted] Council included conflicting advice within their professional officers about storm water drainage requiring us to pay for a civil engineer to submit multiple plans and failure of the Council to record the plans of a large storm water drainage project they themselves had installed, with our permission, on the property two years earlier. Communications from the Council were a puzzle piece of officers' responses rather than a coherent response to the proposal. A preconceived idea of the type of housing guided the conditions the Council placed on the property. The purpose of the subdivision was to create 3 building envelopes for family members on land we have owned for over 50 years, working with the existing bush. The Council established conditions for large concrete monoliths, requiring substantial cut and fill. The Council did not respond to our request for changes to conditions with a statement of reasons but more of 'a computer says no'. The Council approved the DA because they thought they were going to fall foul of their regulatory timelines, so amendments to plans we were making and for which we paid were overlooked. We did submit them as part of our request to change conditions but no considered response to them was provided. We were advised on 9 December 2025 that we could appeal by a date in early January 2026. This timing made it very difficult to secure legal representation to undertake the appeal. We have a DA approval with such</p>

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	<p>onerous conditions that it is too expensive for us as a family. The property size is about 4,000 square metres 5km from the [Redacted] CBD but due to environmental overlays placed on the property by the Council only 3 building envelopes could be created. In 1975 when the property was purchased there were 6 similar blocks, three have been subdivided resulting in 5 large building envelopes on each of those blocks. Our block is described as remnant bush. Families seeking development approvals to create homes for their next generations are at a disadvantage in these processes versus developers. At no point did the Council ask us any questions about who we are, our intentions in relation to the property and what we are hoping to achieve in terms of the dwellings in which we wished to live.</p>
12	<p>My comments are primarily directed towards regional NSW and the issues that are obstacles to the development process: 1. Fees and charges from state and local government are increasing in value and the imposition of new charges on a regular basis. At the very least they should be frozen, ideally discounted to bring the development equation back toward reality. 2. There is a severe shortage in most areas of serviced residential zoned land. In 2000 the target by the then planning Dept was that each LGA had a minimum of 10 years identified residential zoned serviced land. This has dwindled to near zero in many cities. This must be addressed. 3. Wind back the star rating imposition on new houses. Currently all new homes must be 7 star rated which adds thousands of dollars in cost which cannot be easily funded by purchasers. If we can purchase a 3, 4 or 5 star refrigerator, surely we can build 4, 5, 6 and 7 star homes that will assist incredibly with reducing actual house cost. Sure they may consume a bit more energy, but at least the initial capital cost will be lower and people will at least get a foot on the ladder with a new product. 4. Rationalise all requirements for quotas or contributions toward the supply of affordable housing being levied on new homes. This issue is surely a whole of community issue and should not be dumped totally on the mortgage of new home buyers. 5. Government needs to participate in the provision of essential trunk services and infrastructure and not levy the full cost a few. The government receives windfall stamp duty and then rates without any upfront investment. This must be redressed plus any recovery spread over time via a rates levy. 6. Expedite the Biocertification of regional development land to reduce the compliance costs associated with the Biodiversity Conservation Legislation. The time delay and actual compliance cost is high, but the fear of not knowing the likely outcome has led to regional development land simply not even being purchased for the lack of certainty under the regulations. It costs a great deal to find out how much you will need to pay by way of offsets, and in all likelihood, the project will be unfeasible. Developers are simply not prepared to invest to find out and landowners are unwilling to do the work as in all probability it will reduce their sales realisation. In fact many farmers are now preferring to enter stewardship agreements than attempt to sell the land for development. I trust these few points are of some use, and I look forward to the next stage. Apologies for the slightly late submission.</p>