



# Submission to the Productivity Commission Inquiry into Housing Supply Regulation

**Submitted by:** Landscaping Victoria

**Inquiry:** Housing Supply Regulation

**Date:** 11 June 2026

## About Landscaping Victoria

Landscaping Victoria is the peak industry association representing professional landscape businesses across Victoria, including landscape builders, designers, maintenance providers, commercial contractors, suppliers and allied professionals.

Our members are directly involved in delivering the outdoor environments that support new and existing housing, including residential landscapes, streetscapes, drainage solutions, retaining walls, outdoor living spaces, public open space, green infrastructure and commercial landscape works associated with housing development.

Landscaping Victoria welcomes the opportunity to provide input into the Productivity Commission's inquiry into housing supply regulation. Our submission focuses on the practical regulatory barriers experienced by landscape professionals and the opportunities to improve housing delivery without compromising safety, quality, environmental performance or liveability.

## Executive summary

Landscaping Victoria supports regulatory reform that enables more homes to be delivered more quickly, provided reforms maintain appropriate standards for safety, quality, sustainability and liveability.

The landscaping industry plays an important role in housing delivery. Landscaping is often one of the final stages before a dwelling, townhouse development, apartment project or community precinct is completed, handed over and made liveable. Delays, inconsistent requirements, unclear approval pathways and poorly coordinated infrastructure processes can have significant flow-on impacts for builders, developers, landscape contractors, consumers and communities.

While the National Construction Code is outside the scope of this inquiry, many regulatory barriers affecting landscape-related works sit within planning, post-approval conditions, council requirements, subdivision processes, developer contribution frameworks, environmental overlays, drainage and stormwater approvals, open space requirements, and inconsistent interpretation of rules across local government areas.

Landscaping Victoria recommends that governments prioritise reforms that:

**Landscaping Victoria**

Sector Offices, Suite 7, Level 3, 2 Brandon Park Drive, WHEELERS HILL VIC 3150

T: 03 9566 7284

[www.landscapingvictoria.com.au](http://www.landscapingvictoria.com.au)

1. create clearer and more consistent approval pathways across jurisdictions and local government areas;
2. reduce unnecessary duplication between planning, building, infrastructure and post-approval processes;
3. improve coordination between councils, referral authorities, utilities and developers;
4. provide greater consistency in the treatment of landscape-related requirements, including open space, canopy cover, stormwater, permeability, tree protection and vegetation controls;
5. ensure development contributions are transparent, proportionate and linked to the infrastructure required to support growth;
6. recognise landscaping, green infrastructure and public open space as essential housing-enabling infrastructure, not optional finishing works;
7. support faster housing supply while preserving the long-term liveability, climate resilience and functionality of new communities.

## 1. Regulatory reforms governments should prioritise

Landscaping Victoria recommends that governments prioritise practical reforms that reduce delay, uncertainty and duplication in the housing delivery process. In our view, the most important reforms are those that improve coordination and certainty across the approval pathway.

### 1.1 Create more consistent approval requirements across local government areas

Landscape businesses working across multiple council areas regularly encounter different interpretations of similar planning provisions, open space requirements, tree protection rules, drainage conditions, crossover requirements, streetscape expectations and completion standards.

While local conditions should continue to be considered, excessive variation creates uncertainty, slows delivery and adds cost. Inconsistent requirements can also make it more difficult for small and medium-sized businesses to plan, price and deliver works efficiently.

Governments should consider developing clearer statewide guidance, model conditions and standardised documentation for common housing-related landscape requirements, including:

- landscape plans;
- tree protection and replacement planting;
- canopy cover and urban greening requirements;
- permeability and stormwater-related landscaping;
- nature strip and crossover reinstatement;

- public open space interfaces;
- streetscape and frontage treatments;
- completion and handover requirements for common property and shared outdoor areas.

This would reduce unnecessary variation while still allowing councils to respond to legitimate local environmental, heritage, character and risk considerations.

## 1.2 Reduce duplication between planning conditions and post-approval requirements

Landscape-related issues are often considered at multiple points in the housing delivery process. A project may require landscape plans, arborist reports, civil drainage documentation, traffic management plans, public realm approvals, asset protection permits, tree protection bonds, open space contributions and completion inspections.

These requirements may be valid individually, but the cumulative process can be onerous, particularly when separate teams or authorities assess related matters in isolation. This can result in duplicated documentation, repeated revisions, inconsistent feedback and late-stage changes that affect cost and delivery timelines.

Governments should prioritise reforms that allow related matters to be assessed concurrently, particularly where landscape outcomes intersect with drainage, public realm, urban greening, access and subdivision requirements.

## 1.3 Improve coordination between councils, referral authorities and utilities

Housing delivery is often delayed not by one individual approval, but by the combined effect of multiple approvals, referrals and conditions. This is particularly relevant where landscape works interface with public assets, drainage infrastructure, road reserves, utilities, public open space or shared infrastructure.

Landscaping Victoria supports reforms that establish clearer responsibility, timeframes and escalation pathways for approvals involving multiple agencies. Where possible, a single coordinated approval pathway should be used for housing-enabling infrastructure and associated landscape works.

## 1.4 Recognise landscaping and green infrastructure as housing-enabling infrastructure

Landscaping is essential to the function, safety, value and liveability of new housing. It contributes to stormwater management, heat reduction, biodiversity, usable outdoor space, erosion control, public realm quality, pedestrian comfort, canopy cover and community wellbeing.

Housing supply reform should not treat landscaping as a cosmetic or optional final-stage item. Poorly designed or rushed outdoor environments can create long-term maintenance issues, drainage failures, urban heat impacts, tree loss, unusable open space and reduced community acceptance of increased density.

Planning and infrastructure frameworks should recognise professional landscaping, urban greening and public open space as part of the infrastructure required to make housing functional and liveable.

## 2. Most onerous, time-consuming and costly approval steps

From the perspective of the landscaping industry, the most onerous steps are often those that occur after the principal planning approval has been granted. These can include satisfying conditions, obtaining separate permits, meeting public asset requirements, finalising subdivision-related works, responding to council inspections and resolving infrastructure interfaces.

### 2.1 Post-approval conditions

Post-approval conditions can significantly affect project timelines, particularly where conditions are unclear, overlapping or require further approval from multiple council departments.

Examples may include:

- final landscape plan endorsement;
- arborist supervision or tree protection compliance;
- drainage and stormwater management requirements;
- public realm and streetscape works;
- asset protection and reinstatement requirements;
- nature strip, footpath and crossover treatments;
- open space or common property completion requirements;
- requirements for maintenance periods or bonds.

The burden could be reduced by improving the clarity and standardisation of planning conditions, ensuring conditions are proportionate, and providing clear guidance on what evidence is required to satisfy each condition.

### 2.2 Repeated documentation and plan revisions

Landscape contractors, designers and developers may be required to revise plans multiple times to respond to different internal council teams or referral authorities. This is particularly challenging where feedback is provided sequentially rather than concurrently.

For example, a landscape plan may need to respond to planning requirements, drainage requirements, tree protection requirements, public realm requirements and maintenance expectations. If these matters are assessed separately, one change can trigger further revisions across multiple documents.

Concurrent review processes, standardised documentation requirements and clearer digital lodgement systems would help reduce cost and delay.

### 2.3 Inconsistent interpretation of vegetation and tree-related controls

Tree retention, tree removal, replacement planting and canopy cover controls can materially affect site feasibility, design, construction sequencing and landscape outcomes.

Landscaping Victoria supports appropriate tree protection and urban greening objectives. However, inconsistent interpretation of vegetation controls can create uncertainty, particularly in infill housing projects where existing trees, neighbouring trees, easements, services, drainage, private open space and dwelling footprints must be balanced on constrained sites.

Clearer guidance is needed to help applicants understand how tree protection, replacement planting, canopy cover and site functionality should be assessed. This would support better outcomes while reducing unnecessary redesign and delay.

### 2.4 Infrastructure and public asset approvals

Landscape works often interact with public infrastructure, including footpaths, crossovers, drainage pits, nature strips, street trees, kerbs, roads and public open space. Separate public asset approvals can create additional timeframes and uncertainty, particularly where they are not well aligned with planning approvals or building completion requirements.

Reform should focus on better integrating public asset requirements earlier in the approval process so that developers and contractors can plan accurately and avoid late-stage redesigns or completion delays.

## 3. Recent reforms to approvals

Landscaping Victoria supports approval reforms that provide greater certainty, transparency and accountability. Fast-track pathways can be effective where they are genuinely clear, well-resourced and supported by consistent decision-making.

However, fast-track reforms are less effective if they simply move pressure to another part of the system. For example, a faster planning approval may not result in faster housing delivery if projects are then delayed by unresolved infrastructure approvals, post-approval conditions, utility connections, subdivision processes or unclear completion requirements.

To be effective, approval reforms should address the full delivery pathway from planning approval through to practical completion and occupation.

Landscaping Victoria supports:

- clearer statutory timeframes and accountability for decision-making;
- better digital lodgement and tracking systems;
- coordinated assessment across council departments and referral authorities;
- standardised conditions and documentation requirements;
- early identification of infrastructure constraints;
- better use of technology to identify incomplete applications, conflicting conditions or duplicated requirements.

AI-assisted tools may be useful for document completeness checks, triaging applications and identifying conflicting requirements. However, technology should support better decision-making rather than replace professional judgement or create additional compliance layers.

#### 4. Zoning and land-use controls that limit supply

Landscaping Victoria recognises that zoning and land-use controls play an important role in managing growth, protecting environmental assets, preserving heritage, reducing risk and supporting neighbourhood liveability. However, certain controls can limit housing supply or increase costs when they are unclear, overly restrictive or applied inconsistently.

Relevant controls include:

- minimum lot sizes;
- site coverage limits;
- private open space requirements;
- permeability requirements;
- canopy cover targets;
- vegetation protection overlays;
- neighbourhood character controls;
- heritage overlays;
- parking requirements;
- height limits;
- setbacks;
- subdivision controls;
- stormwater and water-sensitive urban design requirements.

Many of these controls have legitimate public benefits. For example, landscaping, permeability, canopy cover and open space requirements can help manage stormwater, reduce heat, improve amenity and support healthier communities. The issue is not whether such controls should exist, but whether they are clear, proportionate, evidence-based and coordinated with broader housing objectives.

Governments should avoid reforms that increase housing supply by stripping away all landscape, open space or environmental requirements. Poor-quality density risks undermining public confidence in housing reform. Instead, governments should focus on making requirements clearer, more consistent and easier to comply with.

## 5. Land release, subdivision and titling

Land release and subdivision processes can significantly affect the timing and feasibility of housing delivery, particularly in growth areas.

From a landscape industry perspective, subdivision and land release processes are closely connected to the delivery of streetscapes, drainage reserves, public open space, tree planting, pedestrian networks, community assets and shared landscape infrastructure.

Delays or uncertainty in subdivision approvals, infrastructure sequencing, bonding arrangements, asset handover and maintenance obligations can affect when landscape works commence and when housing is ready for occupation.

Governments should prioritise reforms that improve coordination between land release, infrastructure planning and the delivery of public realm and landscape works. Land should not simply be released for housing; it should be released with a clear and funded pathway to becoming a functional, serviced and liveable community.

## 6. Development contributions and project feasibility

Development contributions can have a significant impact on project feasibility, particularly where charges are uncertain, inconsistent, poorly timed or not clearly linked to the infrastructure required by a development.

Landscaping Victoria acknowledges that new communities need infrastructure, including public open space, streetscapes, drainage, community facilities and transport connections. However, contributions frameworks should be transparent, predictable and proportionate.

Where contributions are unclear or subject to late change, they can increase risk and discourage investment. Where they are too high or poorly calibrated, they can affect feasibility and reduce the supply of new housing.

Governments should ensure development contribution frameworks:

- are transparent and easy to understand;
- provide certainty early in the project feasibility process;
- clearly distinguish between infrastructure required to service a development and broader community infrastructure;
- avoid duplicating costs already imposed through planning conditions or works-in-kind obligations;

- recognise the value of well-delivered open space, streetscapes and green infrastructure;
- provide clear accountability for how contributions are spent and when infrastructure will be delivered.

## 7. Other housing-enabling infrastructure reform priorities

Landscaping Victoria recommends that the Productivity Commission consider the role of green infrastructure and public realm delivery within housing-enabling infrastructure frameworks.

Housing-enabling infrastructure should include more than roads, pipes and utilities. It should also include the outdoor infrastructure that supports safe, healthy and liveable communities, including:

- public open space;
- street trees and canopy cover;
- stormwater-sensitive landscapes;
- pedestrian connections;
- erosion and sediment control;
- streetscape planting;
- communal outdoor spaces;
- biodiversity corridors;
- urban heat mitigation measures;
- functional private and shared outdoor areas.

Reform should focus on ensuring these elements are planned early, funded appropriately and delivered by qualified professionals.

Poor sequencing of landscape and green infrastructure can create avoidable costs. For example, if drainage, utility, road and public realm works are not coordinated, landscape works may need to be delayed, redesigned or rectified. This can add cost for developers, contractors, councils and ultimately homebuyers.

### Additional issue: workforce and industry capacity

Landscaping Victoria notes that workforce capacity is outside the formal scope of this inquiry. However, the practical delivery of housing supply reforms will depend on the capacity of skilled trades, including landscape professionals, to deliver the works required.

If housing supply increases without corresponding attention to trade capacity, project sequencing, procurement practices and realistic delivery timelines, there is a risk of shifting bottlenecks from the approval system into the construction and completion stages.



While this inquiry may not examine workforce reform directly, Landscaping Victoria encourages the Productivity Commission to recognise that regulatory reform should be designed with practical delivery in mind.

## Conclusion

Landscaping Victoria supports housing supply reforms that reduce unnecessary regulatory burden, improve consistency and enable more homes to be delivered more quickly.

However, speed should not come at the expense of liveability, environmental performance or long-term community outcomes. Landscaping, public open space and green infrastructure are essential components of housing delivery. They help ensure that new homes are not only built, but are supported by functional, attractive, climate-resilient and liveable outdoor environments.

The greatest opportunities for reform are practical and achievable. They include clearer approval pathways, better coordination between authorities, reduced duplication, more consistent local requirements, transparent development contribution frameworks and earlier integration of housing-enabling infrastructure.

Landscaping Victoria would welcome the opportunity to provide further input to the Productivity Commission as the inquiry progresses.

Signed:

Mr. Ritchie Hinton

Chief Executive Officer, Landscaping Victoria

E –

**Landscaping Victoria**

Sector Offices, Suite 7, Level 3, 2 Brandon Park Drive, WHEELERS HILL VIC 3150

T: 03 9566 7284

[www.landscapingvictoria.com.au](http://www.landscapingvictoria.com.au)