Strategic Town Planning
Local Infrastructure Planning
Flood Risk Management
Circular Economy Villages

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SUBMISSION TO THE PRODUCTIVITY COMMISSION

Housing Supply Regulation Inquiry

Submitted by

PolisPlan

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1. About PolisPlan

PolisPlan is an independent strategic town planning consultancy specialising in innovative housing policy, local infrastructure planning, and strategic land use planning for regional and rural communities across Australia.

PolisPlan was established with the conviction that Australia's housing crisis cannot be solved by conventional planning and delivery responses alone. Achieving adequate, affordable, and resilient housing in regional areas requires genuinely new thinking about urban form, financing mechanisms, land use controls, and the relationship between housing and essential services infrastructure.

PolisPlan is also a founding professional member of the Circular Economy Villages Co-operative (CEVCO), an emerging network of development professionals—planners, urban designers, landscape architects, architects, water and energy engineers, sustainability experts, and others—working towards the development of a network of Circular Economy Villages (CEVs) as an alternative form of housing supply for regional Australia. CEVCO is a registered not-for-profit co-operative (Reg. No. NSWC24002).

2. The Circular Economy Village Model: An Overview

The concept of a 'Network of Circular Economy Villages' was developed through doctoral research at The University of Sydney by Dr Steven Liaros, principal at PolisPlan.

A Circular Economy Village (CEV) — also referred to as a regenerative village — is a village-scale, mixed-use community designed from the outset to integrate housing, food, energy, water, waste, and transport systems into a coherent and self-reinforcing infrastructure ecosystem. CEVs are designed for a discrete, pre-determined population (typically around 200 residents) on a minimum site area of approximately 40 hectares and are structured around three precincts: a compact built environment where residents can live, learn, work and play; an agricultural and water management system; and an ecological conservation and rehabilitation area.

CEVs represent a fundamentally different approach to housing supply in regional Australia — one that treats housing not as a discrete commodity but as part of a broader system of community infrastructure. Key features include:

- **Energy micro-grid:** Renewable energy generation (solar, wind, biofuels) and storage, powering homes, workspaces, and shared vehicles including electric golf carts and bicycles.
- **Water micro-grid:** A closed-loop nature-enhancing water system harvesting, cycling, and cleaning water within the catchment in a chain of ponds and constructed wetlands, integrated with food production and ecological restoration.
- **Regenerative agricultural system:** On-site food production that recycles organic waste, generates energy, cleans water, and improves soil health.
- **Passively designed built environment:** Compact, energy-efficient housing and shared workspaces that minimise footprint and operational costs.
- **Digital infrastructure:** A mobile platform supporting community participation in governance, project financing, and day-to-day management.

The model draws on well-established technologies — solar generation, battery storage, constructed wetlands, composting systems, modern methods of construction — and integrates them at the settlement scale, where circular flows become economically viable. It also draws from innovations in tenure, financing and ownership models such as land lease, communities, build-to-rent, co-living, baugruppen (building collectives) and Community Land Trusts.

The financial model treats CEVs as a form of public infrastructure — analogous to social housing with a substantially lower long-term cost to government — and is structured around a build-to-rent-to-own model, with cost-based rental, allowing residents to progressively purchase equity in the village they live in.

Guided by nine design principles — one planet living, diversity, regenerate nature, systems thinking, productive efficiency, localisation, durability, sharing, and connectivity — CEVs are designed to be replicable across diverse regional contexts, forming nodes in a networked urban structure that grows more resilient and economically viable as the network expands.

The development of a network of Circular Economy Villages would optimally be a government-led regional development strategy. It explicitly acknowledges the role of all three levels of government in funding, planning, and regulating CEVs.

The Bellingen Shire Eco-Village Pilot Project

PolisPlan's most directly relevant recent work is the Eco-Village Pilot Project undertaken for Bellingen Shire Council on the NSW Mid North Coast — a project that forms the primary evidence base for this submission.

In 2022, PolisPlan was engaged — with funding from Sustainability Advantage, an arm of the NSW Department of Planning and Environment — to investigate the viability of an eco-village development in Bellingen Shire, and to develop a planning framework that could accommodate this form of housing within the NSW regulatory system. The project was initiated under Action 8.4 of the Bellingen Shire Local Housing Strategy 2020–2040, which committed Council to investigating unique and alternative housing models that could be transferred into mainstream housing policy.

This submission draws directly on that body of work to address each of the three areas of the Commission's inquiry. The planning work undertaken by PolisPlan for Bellingen Shire Council in 2022 produced a complete planning framework that includes:

- **A defined land use term.** The planning dictionary must define the proposed development as a recognised land use category. Without a definition, the use cannot be listed in zone tables, cannot be assessed as permissible or prohibited, and cannot trigger known assessment pathways. The definition characterises what the development is and distinguishes it from other land uses. It is the necessary foundation for everything that follows. The following definitions were proposed for inclusion in either the LEP Standard Instrument or in the State Environmental Planning Policy (Housing):

Proposed definitions (adapted from the Bellingen planning framework, 2022)

Regenerative Village (or **Circular Economy Village)** means a settlement that has been designed:

(i) in accordance with the principles of the circular economy;
(ii) as a singular project for a discrete and pre-determined population; and
(iii) as a system that integrates food, water, energy, transport infrastructure and the built environment.

Circular Economy means a system based on three design principles:

(i) eliminate waste and pollution;
(ii) keep products and materials in use; and
(iii) regenerate natural systems.

- **A locality planning process** to identify suitable locations for regenerative villages, preferably near or adjoining existing towns and villages to complement existing infrastructure and service, and build economic capacity,
- **LEP (Planning Instrument) provisions** permitting this land use in the identified locations and setting principal development standards,
- **Development Controls** governing the design, layout, and infrastructure of regenerative villages
- **A planning agreements policy** for the delivery of shared infrastructure as part of regenerative village development
- **Consideration of implications for ordinary rates, water, sewerage and waste levies.**

The complete framework is available at polisplan.com.au/status or at the Bellingen Council website. The Bellingen framework demonstrates that development standards appropriate to regenerative community settlement — addressing design, density, infrastructure performance, shared facility provision, and site suitability — can be written within the existing structure of Australian planning instruments without requiring new primary legislation. The framework is available as a national template, ready for adaptation by any state or territory. What is required is a nationally coordinated process to review the body of work already done, in conjunction with all stakeholders, and develop a comprehensive planning policy framework that can be adopted nation-wide.

3. Inquiry Area 1: Approval Processes

The Commission's first area of inquiry addresses development, building, and post-approval processes, including barriers to more productive methods of construction. PolisPlan's experience at Bellingen provides direct and detailed evidence on the regulatory barriers facing innovative housing models, and on the planning tools needed to overcome them.

3.1 The Core Planning Problem: Definitional Invisibility

The most fundamental barrier encountered in the Bellingen project was definitional: CEVs — and eco-village or regenerative village models more broadly — do not exist as a recognised land use in any current Australian planning instrument. Existing categories such as 'dwelling house', 'multi-dwelling housing', 'rural industry', and 'tourist and visitor accommodation' each capture elements of a CEV, but none encompasses its integrated character. Other terms like 'rural landsharing communities' and 'multiple occupancies' are used in planning policy but not formally defined in planning dictionaries as a land use category. This creates a situation in which an innovative and genuinely beneficial housing model is effectively prohibited not by deliberate policy choice, but by definitional silence.

PolisPlan developed the definitions above to address this gap. This definition characterises the proposed outcome. The remainder of the planning framework — LEP clause, development controls, and planning agreements policy — is designed to deliver the desired outcome; but only in the locations the local Council and community have determined are appropriate through the multi-criteria locality planning process. This locality planning process complements Council's existing strategic planning functions, integrating CEV site identification into local housing and growth management strategies.

3.2 Translating the Bellingen Framework to National Policy

The PolisPlan planning framework developed at Bellingen was explicitly designed to follow standard planning processes and to be translatable to other states and territories. PolisPlan recommends the following nationally applicable reforms:

(a) Create a nationally consistent definition of 'Circular Economy Village' or 'Regenerative Village'

State and territory planning legislation and instruments should be amended to include a standard definition of CEVs, enabling them to be treated as a permissible use through an appropriate approval pathway. The definition developed at Bellingen provides an example.

(b) Establish a dedicated Regenerative Village approval pathway in state planning frameworks

Rather than requiring each council to develop its own pathway — as occurred at Bellingen, at significant cost in time and expertise — state planning frameworks should include a standard approval pathway for regenerative village developments. This pathway should incorporate locality planning (site suitability assessment), permissibility provisions, development controls, and infrastructure planning requirements. The Bellingen framework provides a template.

This would provide regulatory certainty for investors, developers, and communities, and would significantly reduce the per-project cost. It would also support the scalability of the Regenerative Village model, consistent with the ambition to develop a network of villages across regional Australia.

3.3 Construction Productivity & Commonwealth seed funding for a self-sustaining program

The character of CEV built environments creates natural opportunities for modern methods of construction, including prefabrication and modular assembly. The CEVCO network is actively exploring these approaches as a means of reducing construction costs and improving delivery timelines. However, uptake of modern methods is constrained by the lack of consistent demand. A pipeline of CEV projects across regional Australia will allow for a significant upscaling of prefabricated construction capacity.

Providing regulatory certainty for the CEV model — through the definitional and pathway reforms recommended above — will therefore also catalyse construction productivity gains, as developers and builders invest in purpose-designed delivery systems for a known and replicable development product.

The ambition to develop a network of regenerative villages across regional Australia depends not only on the above modifications to the planning regime but also seed funding for a national CEV demonstration program consisting of a number of well-resourced pilot projects across different geographic, climatic, and tenure contexts — including regional, rural, remote, and urban settings. The purpose of the program is to test, refine, and publicly document what cooperative and regenerative settlement models can achieve when the regulatory barriers identified in this submission are removed, generating evidence that can directly inform national planning policy development.

A pipeline of CEV projects, developed to consistent planning and performance standards, would provide the sustained and repeatable demand that makes factory-based prefabrication economically viable — particularly in regional settings where on-site construction costs are high, skilled labour is scarce, and supply chains are long. Prefabrication also aligns closely with the high energy performance standards that CEVs require, and with the design repeatability that makes the network model scalable. PolisPlan recommends that the Commonwealth incorporate a dedicated modern methods of construction stream into a national CEV demonstration program, specifically to pilot and document the use of prefabricated and modular housing in regenerative village settings, and to develop the supply chain capacity needed to scale this approach across Australia.

4. Inquiry Area 2: Availability and Use of Land for Housing

The Commission's second area of inquiry addresses land release and land use controls. For regional Australia, the challenge is less often a shortage of land in absolute terms than a combination of land tenure, zoning, and viability constraints that prevent appropriate land from being brought into productive residential use. The Bellingen experience illuminates these constraints clearly.

4.1 Land zoning and the CEV Model

CEVs require a minimum site of approximately 40 hectares to deliver the full infrastructure ecosystem — energy, water, food, housing, and conservation — that makes the model viable and distinctive. Sites of this scale in regional areas are typically zoned for rural or environmental purposes, not residential use. Achieving the necessary rezoning or planning pathway therefore requires a level of strategic planning effort and regulatory navigation that is naturally the responsibility of local and state governments.

The Bellingen project included a systematic multi-criteria site assessment of candidate properties across the Shire, applying criteria including proximity to existing towns, flood risk, ecological sensitivity, agricultural capability, and accessibility. This locality planning process — which can be integrated into any Council's housing strategy framework — provides a model for how potential CEV sites can be identified and pre-qualified within existing strategic planning processes, reducing the regulatory uncertainty faced by proponents.

4.2 Land Use Controls and Alternative Housing Models

Current land use zoning systems in most Australian jurisdictions are poorly suited to the integrated, mixed-use character of CEVs. Rural zones typically prohibit residential development other than dwelling houses; residential zones typically prohibit agricultural uses; environmental zones prohibit almost everything. Yet the defining characteristic of a

CEV is precisely its integration of these uses: housing within a working agricultural and ecological landscape.

PolisPlan recommends the following reforms to land use controls:

(a) Integrate CEV locality planning into regional and local housing strategies

State planning frameworks should require or encourage councils to assess potential CEV sites as part of their housing strategy development and review processes. This would ensure that candidate sites are identified, assessed, and, where appropriate, pre-qualified through an open and transparent process, reducing uncertainty for proponents and communities alike.

(b) Address financing barriers for collective ownership

The PolisPlan/Bellingen project identified challenges with financing as a key complexity for regenerative village models and housing that is held and managed collectively. The project identified community land trusts as an important guiding framework for collective financing and ownership of cooperative developments. A national policy framework for CEVs should examine this framework to provide certainty for investors, residents, and councils.

4.3 The Regional Land Supply Problem

In many regional towns, the shortage of housing for essential workers — nurses, teachers, police, agricultural workers — is not a function of insufficient land supply but of market failure: private greenfield subdivision developments are generally not viable to generate adequate supply. The CEVCO financial analysis demonstrates that CEVs, as a form of public infrastructure with government seed funding and a build-to-rent-to-own model, can supply housing for essential workers in a way that conventional private development cannot.

The Commission should recognise that in regional Australia, land availability and land use controls alone are insufficient to solve the housing shortage. The supply problem is fundamentally also a construction industry capacity and financial viability problem, and the recommendations under Section 5 below address the infrastructure funding dimension of this challenge.

4.4 Infrastructure Self-Sufficiency and Land Availability

A further dimension of land availability is the relationship between infrastructure access and development feasibility. In regional and rural contexts, the conventional equation of ‘available land’ with proximity to existing reticulated networks — water, sewerage, and electricity — effectively excludes large areas of physically suitable land from the housing supply equation. This constraint is especially acute in the regional settings where CEVs are most needed, where network extension is often not economically viable.

The CEV model resolves this constraint directly. By incorporating its own energy micro-grid, closed-loop water system, and waste management infrastructure, a CEV is not dependent on connection to external utility networks. The infrastructure self-sufficiency that defines the CEV model should therefore be formally recognised as increasing land availability for the purposes of housing supply targets. PolisPlan recommends that the Commonwealth, through the National Housing Finance and Investment Corporation and in guidance to state planning ministers, recognise that land is ‘available for housing’ where a proposed CEV development incorporates its own compliant energy and water infrastructure — regardless of proximity to existing network connections. This would expand the effective land supply for CEV development in regional Australia at no public cost and would allow CEVs to contribute toward National Housing Accord targets on a consistent and transparent basis.

5. Inquiry Area 3: Infrastructure Processes and Frameworks

The Commission's third area of inquiry addresses growth infrastructure planning and developer contribution models. This is arguably the area where the CEV model has the most significant implications for national housing policy, because it proposes a fundamentally different relationship between housing and infrastructure.

5.1 Rethinking Infrastructure: From Developer Impost to Public Investment

Conventional greenfield housing development treats infrastructure as a cost imposed on developers — either as a condition of development consent or through developer contributions. Infrastructure is conceived as external to the housing product: roads, water, sewerage, and power are provided to housing lots, whether by developers or public authorities, who pass the cost on in land prices.

The CEV model inverts this relationship. Infrastructure — energy, water, food, waste, and transport systems — is not external to the village but integral to it. The village is, in essence, an infrastructure ecosystem that happens to include housing. This integration fundamentally changes the economics of housing delivery: the infrastructure systems that in a conventional subdivision would be provided by councils and utilities at public cost are instead provided by the CEV itself, generating ongoing operational income and reducing long-term public expenditure.

The CEVCO White Paper proposes that CEVs be treated as a form of public infrastructure, and that the cost-benefit analysis for government investment be assessed on the basis of economic, social, and environmental benefits to residents and surrounding communities, rather than simply on financial return. This framing is consistent with the treatment of social housing as public infrastructure but goes further in recognising the broader environmental and economic productivity benefits of CEVs for regional communities.

5.2 Developer Contributions and Voluntary Planning Agreements

The Bellingen project included a draft Voluntary Planning Agreement (VPA) Policy specifically tailored to CEV development. Conventional developer contributions frameworks are designed for conventional subdivision, assessing the nexus between development and infrastructure need. CEVs present a different profile: they internalise many infrastructure costs (energy, water, waste) while generating lower demand (than greenfield subdivisions) for some external infrastructure (road upgrades, off-site sewerage capacity).

The VPA policy developed at Bellingen provides a mechanism for negotiating infrastructure contributions that reflects this distinctive profile, allowing Council and the developer to agree on a bespoke package of contributions that is proportionate to actual infrastructure demand generated by the CEV, and that credits the CEV's self-provision of systems that would otherwise be Council's responsibility.

PolisPlan recommends that state planning frameworks develop specific guidance on developer contributions for CEVs, drawing on the Bellingen model, to ensure that contribution requirements are proportionate, equitable, and do not represent an additional regulatory barrier to this form of housing.

5.3 Infrastructure Regulation for CEV-Scale Systems

The integration of energy, water, and waste systems that defines the CEV model also creates regulatory complexity. Current frameworks governing energy networks and water systems were designed for large-scale utility providers and do not readily accommodate community-managed systems of the kind that CEVs require. The Bellingen project identified these regulatory barriers as a significant constraint on CEV viability alongside the planning

barriers addressed in Section 3. The energy micro-grid and closed-loop water systems that are essential to the CEV model face a disproportionate compliance burden when assessed against standards developed for metropolitan reticulated networks.

PolisPlan recommends that the Australian Government, working with state and territory energy and water regulators, review and reform the regulatory frameworks governing community-managed energy microgrids and water systems to ensure they are proportionate and accessible for neighbourhood-scale developments. Specific reforms should include:

- the introduction of a formal definition of a ‘community microgrid’ in the National Electricity Law, with a tailored regulatory framework for community-owned and operated systems;
- streamlined licensing pathways for embedded network operators in community developments, with compliance requirements scaled to system size and community governance structures;
- recognition of community-managed water systems as a legitimate basis for development approval where systems meet appropriate public health standards; and
- confirmation of eligibility of CEV energy and water infrastructure for relevant federal funding programs, including ARENA and the Clean Energy Finance Corporation.

5.4 Government Infrastructure Funding for CEVs

The CEVCO financial model proposes a staged government investment strategy, recognising that CEVs will not be commercially viable without seed funding, particularly in the early stages of the program before the network effect of multiple villages reduces per-unit costs. The model identifies five reasons why government investment in CEVs as public infrastructure is justified:

- **Alternative development strategies:** Many regional towns have strategically identified areas for housing but face viability barriers to private development; CEVs offer a public housing solution using modern construction methods.
- **Economic viability:** CEVs can supply housing for essential workers, supporting the viability of regional businesses and services; the post-COVID acceleration of tree-change migration has exacerbated housing shortages for workers in towns such as Bellingen and Byron Bay.
- **Delivering essential services:** Remote towns often lack both essential workers and the housing to accommodate them; an integrated policy approach linking housing supply to service delivery is needed.
- **Downsizing pathways:** CEVs can provide compact, community-oriented housing for older residents wishing to downsize within their community, freeing up larger homes for families.
- **Planned climate resettlement:** Numerous regional towns in floodplains or at bushfire risk face the need for planned resettlement; CEVs provide a viable, designed alternative to ad-hoc relocation.

PolisPlan recommends that the Commission consider how Commonwealth and state infrastructure funding programs — including the $2 billion Local Infrastructure Fund and the National Housing Accord — can be directed to support the development of CEVs in regional areas. Specifically, we recommend:

- That CEVs be recognised as an eligible housing typology within the National Housing Accord target of 1.2 million new homes;

- That the Local Infrastructure Fund include a regional CEV stream, providing seed funding for the first wave of villages in areas of demonstrated housing stress;
- That state housing agencies develop a CEV pipeline program, identifying suitable sites and facilitating the planning, funding, and delivery of the first villages in collaboration with councils; and
- That a national CEV feasibility and business case framework be developed, providing consistent cost-benefit methodologies that capture the full economic, social, and environmental value of CEV developments.

The case for a national CEV demonstration program — including the role of Commonwealth seed funding in generating the pipeline of projects needed to upscale prefabricated construction — is set out in Section 3.3 above, which addresses the construction productivity dimension of this inquiry.

5.5 CEVs and Regional Economic Development

Beyond housing supply, CEVs generate significant regional economic development benefits that are relevant to the Commission's broader terms of reference. A well-located CEV of 200 residents represents a meaningful addition to the population of a small regional town, supporting local businesses, services, and institutions. The regenerative agricultural system creates local food production employment. The energy micro-grid creates skills in renewable energy operation and maintenance. The digital platform infrastructure can support remote and hybrid work, attracting knowledge workers to regional areas.

These benefits are amplified as the CEV network grows. The CEVCO program is premised on the replicability of the CEV as a development product: each village built reduces the per-unit cost of subsequent villages, and the network of villages creates a shared infrastructure and governance platform that generates increasing returns. This network dimension of the CEV model is directly relevant to the Commission's interest in construction productivity: a standardised, replicable housing product delivered through a co-operative network can achieve economies of scale that individual village projects cannot.

5.6 Community Resilience as a Housing Policy Objective

The terms of reference do not explicitly reference community resilience, but PolisPlan submits that it is implicit in the government's housing agenda and should be made explicit in the Commission's recommendations. The communities most affected by Australia's housing shortage — regional towns facing essential worker shortages, coastal communities impacted by tree-change migration, flood-affected communities in the Northern Rivers — are also those most exposed to climate-related disruption and economic volatility.

CEVs are explicitly designed for resilience. The integration of energy, water, food, and waste systems means that CEV residents are substantially less dependent on external infrastructure systems and global supply chains that are vulnerable to disruption. The build-to-rent-to-own model creates long-term tenure security for residents, reducing the housing instability that undermines community cohesion. The co-operative governance model builds social capital and collective capacity for adaptation.

PolisPlan recommends that the Commission's final report include community resilience as an explicit objective of housing supply policy, alongside affordability, adequacy, and productivity. A housing system that delivers more homes but concentrates those homes in vulnerable locations, or that delivers housing to people without tenure security, does not achieve the goals of the National Housing Accord.

6. Summary of Recommendations

PolisPlan's recommendations to the Commission, drawing on the Bellingen Shire Eco-Village Pilot Project, are as follows:

Approval Processes

- Introduce a nationally consistent definition of 'Circular Economy Village' or 'Regenerative Village' in state and territory planning instruments.
- Establish a dedicated approval pathway in state planning frameworks, drawing on the Bellingen LEP and DCP framework as a potential model.
- Fund a national CEV demonstration program, supporting the development of a small number of well-resourced pilot projects across different geographic, climatic, and tenure contexts — including regional, rural, and remote settings — with competitive project selection, consistent planning and performance standards, and rigorous evaluation to generate evidence informing national planning policy and building the supply chain capacity needed to scale the CEVCO program.
- Incorporate a dedicated modern methods of construction stream into the national CEV demonstration program, to pilot prefabricated and modular housing in regenerative village settings and build the factory capacity and supply chains needed to scale this approach across regional Australia.

Land Use

- Reform land use zoning to permit CEV development across rural, environmental, and residential zone types, assessed against the locality planning criteria developed through the Bellingen framework.
- Require or encourage councils to assess and identify potential CEV sites as part of housing strategy development and review.
- Develop national policy guidance on financing models for collectively held CEV developments, drawing on the community land trust framework and equivalent cooperative ownership structures, to provide certainty for investors, residents, and councils.
- Acknowledge that land is 'available for housing' where a proposed CEV development incorporates its own compliant energy and water infrastructure — regardless of proximity to existing network connections — expanding the effective land supply for CEV development in regional Australia at no public cost.

Infrastructure

- Recognise Regenerative Villages as an eligible housing typology within the National Housing Accord 1.2 million homes target.
- Establish a regional Regenerative Villages stream within the $2 billion Local Infrastructure Fund.
- Develop state Regenerative Villages pipeline programs linking site identification, planning, and funding.
- Develop specific guidance on developer contributions and Voluntary Planning Agreements for CEV development.
- Develop a national CEV feasibility and business case framework capturing full economic, social, and environmental value.

- Include community resilience as an explicit objective of housing supply policy in the Commission's final report.
- Reform regulatory frameworks governing community-managed energy microgrids and water systems, introducing a formal 'community microgrid' definition in the National Electricity Law, streamlined licensing pathways for CEV embedded network operators, and recognition of community-managed water systems as a legitimate basis for development approval.

7. Contact Details

PolisPlan welcomes the opportunity to appear before the Commission or to provide further information on any aspect of this submission, including the Bellingen project documentation.

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Additional reference materials including the full Bellingen Shire Council report, the draft LEP clause, DCP chapter, and Voluntary Planning Agreements Policy are publicly available at:

www.bellingen.nsw.gov.au/Development/Planning-Controls-superseded/Housing-Strategy-Implementation-Eco-village-Pilot-Project

The CEVCO White Paper (May 2026) is available from CEVCO directly at: *info@cevco.life*