

SUBMISSION TO THE

Productivity Commission

Inquiry into Housing Supply Regulation.

[Redacted]

About Housing All Australians

Housing All Australians (HAA) is a Public Benevolent Institution with Deductible Gift Recipient status, established to mobilise private sector resources, skills and capital to address Australia's housing affordability crisis. We represents the voice of the private sector and our philosophy is compassionate capitalism: recognising that a well-functioning economy cannot be built on a foundation of housing insecurity, and that business sustainability and social good are complementary rather than competing objectives.

HAA operates across two complementary initiatives. Our transitional housing programs have provided more than 170,000 nights of accommodation nationally, at no cost to taxpayers, through Meanwhile Use and Pop-Up Housing projects in partnership with corporate partners including Metricon, Henley Homes, Hansen Yuncken, Mirvac, Dulux, CSR, Better Living Group, Quest Apartment Hotels, Interface and many many others.

Our second major initiative is the Progressive Residential Affordability Development Solution (PRADS), a proposed national digital platform designed to create the compliance and accountability infrastructure that Australia's affordable housing system currently lacks.

Since 2025, HAA co-produces the annual Rental Affordability Index (RIA) with National Shelter and SGS Economics. RIA started its journey over 10 years ago identifying an emerging social issue. Now, it has also become a problem for business and is a fundamental productivity issue. HAA has engaged with the National Housing Supply and Affordability Council, multiple state and territory governments, Federal Treasury, local government associations, peak property bodies, and community housing providers. HAA has made formal pre-budget submissions to the Australian Government in 2024, 2025 and 2026.

Executive Summary

This submission responds to the Productivity Commission's inquiry into Housing Supply Regulation, as tasked by the Treasurer on 28 May 2026.

Australia's housing affordability crisis is too big for government to solve on its own. The scale is unambiguous. [The 2021 NHFIC review \(Leptos report\)](#) found that Australia needs \$290 billion in investment to build 44,500 social and affordable homes every year for twenty years. Housing Australia is targeting 10,000 homes annually over five years. The gap between what government can fund and what the nation needs is 33,500 homes per year. That gap can only be closed by mobilising private sector capital at a scale that has never previously been attempted in Australia's housing system. The central question is not whether the private sector has a role, rather what regulatory conditions must exist to make industry participation possible at the required scale.

HAA submits that the most significant and under-examined barrier to private sector participation is not in the approval process, though that is serious, but in what happens after approval: the absence of any national system to record, track and verify that affordable housing obligations attached to planning consents are delivered.

Currently, affordable housing that is delivered flows almost entirely through the community housing provider (CHP) sector, which manages its own portfolio responsibly. But this system is no longer fit for purpose because the CHP sector is becoming a concentration risk: it is currently the single channel through which all affordable housing must pass, and its capacity is a fraction of what Australia needs. By contrast, market delivered affordable housing outside the CHP channel, sits largely unmonitored, sitting on static spreadsheets within local and state planning authorities across Australia. Every year, significant value is granted through accelerated approvals or density uplifts to the development industry every year in exchange for affordable housing commitments. Yet, outside the CHP channel, no state or territory has a complete, reliable, real-time record of what obligations exist, whether they have been built, or what rents are being charged. The result is a system that generates obligations it cannot track, investments it cannot measure, and outcomes it cannot verify.

Equally serious is the failure to collect the housing data that governments need to design and calibrate policy intelligently.

Together these structural failures are suppressing institutional investment, misallocating public priorities and funding, and leaving our otherwise world class superannuation system on the sidelines as we grapple with addressing the nation's most pressing social and economic challenge.

In direct response, HAA has developed the Progressive Residential Affordability Development Solution (PRADS). PRADS is a proposed national digital register that would provide state and territory Housing Registrars with real-time compliance monitoring of all affordable housing obligations registered on property titles. It is digital public infrastructure: the missing accountability layer that makes the housing system's commitments enforceable, verifiable and investable.

The PRADS model is gaining recognition across the sector nationally. HAA is in active discussions with the Victorian, New South Wales, Tasmanian, Queensland and Federal Governments, each at varying stages of engagement. Discussions with Victoria is the most advanced with an MOU being executed between HAA and Development Victoria.

NSW has already legislated the foundational regulatory model through the Community Housing Providers (Adoption of National Law) Amendment Act 2025.

Industry has recognised the compliance and data gap through letters of support from the Property Council of Australia, Urban Development Institute of Australia, Housing Industry Association, Master Builders Australia, Real Estate Institute of Victoria, REA Group, the Commonwealth Bank of Australia, Norton Rose Fulbright, SGS Economics, Aware Super Real Estate and many more.

[PricewaterhouseCoopers has independently confirmed the financial viability of the PRADS economic model.](#)

Critically, the National Housing Supply and Affordability Council specifically cited PRADS in its State of the Housing System 2025 report.

This submission builds on this momentum and makes five specific recommendations addressing each element of the inquiry's terms of reference with a particular focus on how PRADS can serve as the national digital compliance infrastructure that converts planning conditions into enforceable, verifiable, title-registered affordable housing commitments.



Spotlight on the recommendations made in this submission:

HAA recommends that the Commission advance five reforms designed to work in unison to strengthen national housing accountability with a focus on addressing barriers to the delivery of affordable housing in Australia.

RECOMMENDATION 1: Establish PRADS as national digital public infrastructure

Seedfund PRADS to operational status and mandate Treasury / Housing Australia to work with HAA to deploy it as the compliance and reporting layer for the Accord, closing the longidentified national data and compliance gap.

RECOMMENDATION 2: Mandate covenantbased affordability obligations

Require all Commonwealth supported affordable housing commitments (including HAFF and Accord projects) to be secured by title registered restrictive covenants, ensuring obligations are legally durable, enforceable and monitorable through PRADS.

RECOMMENDATION 3: Designate Housing Registrars as the PRADS compliance authority

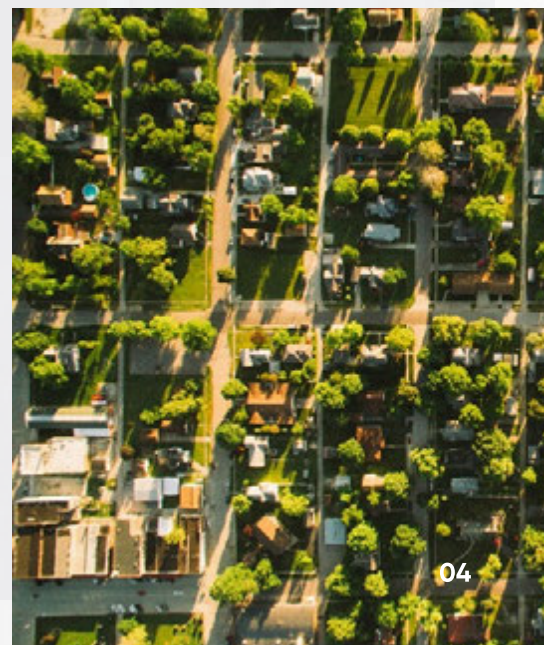
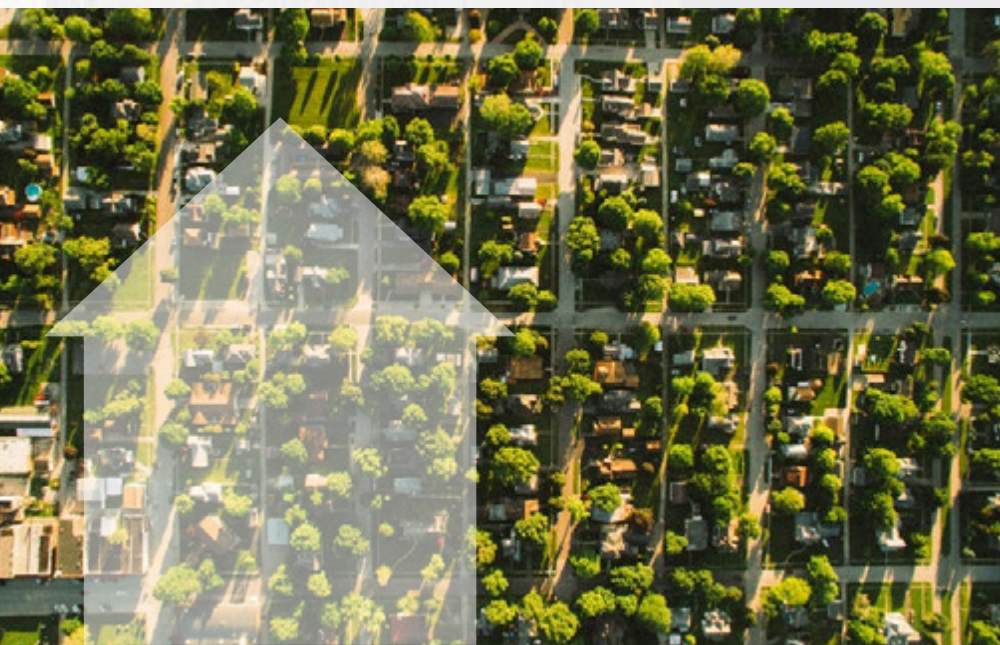
Assign state and territory Housing Registrars (or jurisdictional equivalents) as being responsible for enforcing PRADS registered obligations, supported by PRADS' realtime monitoring and alerts. This preserves jurisdictional enforcement while delivering nationally consistent standards for institutional investors.

RECOMMENDATION 4: Extend the Responsible Housing Manager model nationally

Adopt NSW's legislative framework enabling accredited private operators to manage affordable housing alongside CHPs and harmonise this model nationally with federal endorsement and PRADS integration as a prerequisite for investment at the scale necessary under the National Accord. There needs to be national consistency.

RECOMMENDATION 5: Commission a national codesign process to accelerate PRADS

Fund and mandate a structured national codesign process involving governments, registrars, developers, financiers, CHPs, local governments and tenant advocates. The working group is ready to commence, chaired by Glenn King former Managing Director of PEXA, with multiple jurisdictions already engaged.



1.1 The Approval Problem: The Failure Most Talked About

The Commission's terms of reference accurately identify approval processes, land availability, and infrastructure delivery frameworks as the three areas of regulatory concern. HAA endorses the findings from the resilient economy inquiry that regulation in the construction and planning sectors is among the most burdensome in the Australian economy. Around 40 participants in that inquiry highlighted planning, approvals and compliance for construction as particularly onerous. The UDIA submitted that building has become increasingly complex, fragmented, and costly. Master Builders Australia noted that changes to the National Construction Code (NCC) have increased complexity and compliance costs (noting that the NCC is out of scope for this particular inquiry).

The Commission is right to focus on removing barriers to approvals. Australia needs to build more homes, and the planning and approvals system is a structural constraint on supply. HAA supports streamlining approval processes, harmonisation across jurisdictions, and the use of digital tools to accelerate decision-making. These reforms are necessary and HAA endorses them. But they address only one side of the problem.

1.2 The Compliance Problem: The Failure Nobody Talks About

There is a second, less-examined regulatory failure that is equally damaging to housing supply and to the efficient use of public planning value.

Across Australia, affordable housing obligations attached to planning approvals are recorded by local government planning on static spreadsheets, if at all. There is no real-time digital system tracking what has been committed, what has been built, and what rent is being charged. The affordable housing that does get delivered is funnelled almost entirely through community housing providers, who manage their own portfolios responsibly, but whose sector capacity is a fraction of what Australia needs. The broader universe of planning obligations sits largely unmonitored outside of CHP-managed stock. Affordable housing conditions can be renegotiated, waived, or allowed to lapse with no systemic means of detection. [The City of Port Phillip in Victoria, in its letter of support for PRADS](#), described this directly: councils lack the tools to track whether the affordable housing commitments made as conditions of planning approval are ever delivered. The result is that the planning value uplift granted to developers in exchange for affordable housing routinely does not produce outcomes at the scale the planning system nominally promises.

This structural gap matters for housing supply in two ways:

1. First, it means affordable housing that approvals nominally promise is not being delivered at anything close to the scale the planning system suggests, because the only channel through which it can flow, the CHP sector, is capacity-constrained and cannot absorb the full volume of obligations being generated.
2. Second, and more significantly for the Commission's inquiry, it destroys investor confidence essential to private sector affordable housing delivery at scale. Institutional investors, superannuation funds, major development partners and build-to-rent operators will not commit long-term capital to affordable housing without certainty that affordability covenants will be monitored, enforced, and survive changes in property ownership. PRADS provides that certainty, and in doing so opens the delivery channel to the private sector for the first time.

It must also be noted that the development sector more broadly (not just institutional investors) faces risk posed by the current compliance gap. Many are willing to deliver market affordable homes as a conscious capital decision, but only if they have certainty that the affordability they create cannot be captured by another party who buys and on sells at a profit. Without a consistent, enforceable, title based mechanism, developers face risk of delivering affordable housing that others can trade on for a profit. This undermines confidence, suppresses supply, and reinforces structural failure.

The Commission's resilient economy inquiry found that poor regulation acts as a handbrake on growth, innovation and investment. The absence of a compliance monitoring framework for affordable housing is precisely that kind of regulatory gap: one that simultaneously reduces supply, wastes public planning value, and deters the private investment that affordable housing needs to scale.

1.3 The Data Failure: A Third Problem Hiding in Plain Sight

There is a third failure that compounds both of the above: Australia has no reliable national data on affordable housing stock, its location, its type, its occupancy, or its condition. Without this data, governments cannot measure the effectiveness of public policies. They cannot identify which local government areas are undersupplied. They cannot calibrate incentives needed to activate the market conditions towards the direction needed to achieve public policy. They cannot determine whether the incentives they are granting are proportionate to the affordability outcomes they are receiving.



HAA believes this data failure is not peripheral to the Commission's inquiry. It is central to it. The Commission cannot make evidence-based recommendations about which regulatory settings produce better housing supply outcomes without knowing what those outcomes actually are. PRADS addresses this failure by generating, for the first time, a comprehensive, verified, real-time national dataset on affordable housing obligations, compliance, locations, housing types, income bands served, and the relationship between planning incentives granted and outcomes delivered.

The Systemic Nature of the Gap

In recognising these interconnected failures, a system-wide gap emerges.

The National Housing Supply and Affordability Council, in its State of the Housing System 2025 report, specifically highlighted the absence of a national compliance monitoring mechanism as a structural failure. The Council characterised the PRADS approach to securing affordable housing obligations on title as an innovative response to this gap. The UNSW City Futures Research Centre, in its March 2026 report on Digital Public Infrastructure for housing, cited PRADS by name as an example of improving observability and rental transparency to drive better enforcement of rental affordability.

Multiple participants in the Commission's resilient economy inquiry raised the construction and planning sector as needing urgent reform. The Amplify submission called for streamlining compliance pathways and harmonisation of planning and consumer protections. The Australian Chamber of Commerce and Industry noted that achieving the National Housing Accord target of 1.2 million homes will require coordinated regulatory reform across all states and territories. None of these submissions identified the compliance and data gap that exists after approvals are granted as a distinct problem.

PRADS is designed to fill this gap.

2.1 What is the proposed PRADS approach

PRADS is a digital platform being developed by Housing All Australians to create the missing compliance and accountability infrastructure for affordable housing delivery in Australia. It is not yet operational. HAA is building it in the national interest, for the benefit of the entire housing ecosystem, and it is already supported by a significant and growing coalition of organisations.

Support for PRADS spans the property, banking, legal, economics, government and community sectors and includes the Property Council of Australia, the Urban Development Institute of Australia, the Housing Industry Association, Master Builders Australia, the Real Estate Institute of Victoria, REA Group, the Commonwealth Bank of Australia, Norton Rose Fulbright, SGS Economics, Urbis, Aware Super Real Estate, HOME (one of Australia's largest build-to-rent operators), and numerous local governments. Prominent independent economist Saul Eslake has publicly endorsed the PRADS approach. This breadth of industry endorsement reflects a shared recognition that the compliance and data gap is real, systemic, and addressable only through purpose-built digital infrastructure. PRADS is designed to do something that no current system in Australia can reliably do: record, monitor and enforce affordable housing obligations at the property title level, in real time, across jurisdictions, and with full visibility to the Housing Registrar (or equivalent) in each state and territory.

2.2 The Five Core Mechanics

- **Using the carrot, not the stick:** The PRADS economic model initially uses planning-based value creation as the subsidy mechanism. When government grants additional density or a streamlined pathway in exchange for an affordable housing commitment, the uplift is calibrated so that the additional value created equals or exceeds the cost of the affordable commitment. No direct government “cash” subsidy is required.
- **Restrictive covenants on title:** Affordable housing obligations are embedded directly in property titles as legally binding covenants, not as soft planning conditions that can be renegotiated or allowed to lapse. The affordability obligation travels with the title, not with the developer or the owner, ensuring the commitment endures across changes in ownership.
- **Back-solving to genuine affordability:** Rather than applying an arbitrary discount below market rent, PRADS will calculate the precise percentage below market rent that key workers can genuinely afford in a specific Local Government Area, based on actual occupation-level income data. This eliminates the well-documented perverse outcome of affordable housing sitting vacant because a nominal discount still produces rents that are unaffordable in practice.
- **Real-time digital compliance monitoring:** A purpose-built register provides Housing Registrars with live visibility of covenant compliance. Tenants can be verified as eligible. Rents can be checked against covenant conditions. Breaches can be flagged automatically. This converts affordable housing from a planning outcome that government hopes will be delivered into one it can continuously verify has been delivered. It also removes the demand and dependence risk being placed on the CHP sector and frees up their limited capacity to focus on their core remit of subsidised affordable housing by creating a new complementary digital and dynamic system for maintaining market accountability for the delivery of affordable housing.
- **Engagement of the entire property ecosystem:** PRADS is designed to work with Australia's existing property management infrastructure. Private real estate agents and property managers participate as Responsible Housing Managers, managing PRADS-registered affordable tenancies through familiar platforms including realestate.com.au. This normalises affordable housing within the mainstream property market, removing the stigma and operational friction that currently deters private sector participation.

2.3 PRADS as National Digital Infrastructure: The Digital Ecosystem in Action

The UNSW City Futures Research Centre has framed PRADS as a candidate for classification as national Digital Public Infrastructure. The Commission should consider what this means in practice. National Digital Infrastructure is not simply a government database. It is a platform that connects multiple systems, actors and data sources in the public interest, creating value that no single organisation could generate alone. The most instructive analogy is PEXA, the national property settlement platform that transformed conveyancing in Australia by replacing fragmented, paper-based state systems with a single, interoperable digital layer. PRADS will do for affordable housing compliance what PEXA did for property settlement: it will create the national digital backbone that makes a fragmented, state-by-state system function as a coherent whole and unlock private sector capital, and management, at scale.

The strategic significance of PRADS as national digital infrastructure becomes clearest when its ecosystem integrations are considered together. REA Group, operator of realestate.com.au, Australia's largest property platform, has formally supported PRADS and has already introduced an affordability filter on realestate.com.au that will enable key workers to search specifically for PRADS-tagged rental listings. REA has confirmed in writing to HAA that demand for affordable housing on realestate.com.au has significantly outstripped supply, with only a very limited number of affordable homes advertised each month. The filter is already imbedded into realestate.com. What is missing is the supply of PRADS-registered properties to fill it. This is precisely the supply-side gap that PRADS addresses: it is not a demand problem, it is a compliance and registration infrastructure problem will unlock private sector capital at scale.

The integration with realestate.com.au also directly addresses one of the most persistent barriers to private sector participation in affordable housing: the association in the minds of property managers between affordable housing and social housing tenants with complex needs. By presenting PRADS-registered affordable tenancies as standard listings on a familiar commercial platform, managed by private property managers through their existing systems, PRADS will normalise affordable housing as a mainstream rental product. A property manager listing a PRADS-registered property on realestate.com.au does not need to understand affordable housing policy. They manage the tenancy the same way they manage any other. The compliance monitoring happens in the background through PRADS.

HAA and REA Group are also in early discussions with SEEK, Australia's leading employment platform, to explore an integration that would connect affordable housing availability directly with job advertisements. The concept is straightforward but we believe transformative. A nurse considering a role at a regional hospital, a teacher weighing a position at a rural school, or an early childhood educator exploring opportunities in a growth corridor currently faces two entirely separate searches: one for the job on SEEK, and another for somewhere to live on realestate.com.au. There is no connection between them. The worker must independently determine whether the advertised salary is sufficient to cover rent in the location of the role, a calculation that is often opaque and frequently discouraging enough to prevent regional workforce mobility altogether.

The SEEK integration being explored would change this. A job advertisement for a key worker role could carry a direct link to PRADS-tagged rental listings available in the same location, at rents verified as affordable for the salary range advertised. The worker would see, within the job advertisement itself, that affordable housing exists nearby, how many properties are currently available, and what the rent level is relative to their prospective income. For employers in essential services struggling to attract workers to regional locations, this becomes a genuine recruitment tool. For the Commission's inquiry, it illustrates what national digital infrastructure enables: not just compliance monitoring, but a connected housing and employment ecosystem that serves the productivity and workforce mobility goals that the Commission is examining with the aim of finding ways to support the growing cohort of Australian's struggling to find housing that is affordable.

These discussions with SEEK are at an early stage. HAA raises them in this submission not as a commitment but as an illustration of the strategic thinking that national digital infrastructure enables. Once the PRADS register exists as a national, verified, real-time dataset of affordable housing stock, the range of integrations that become possible, with employment platforms, healthcare workforce systems, local government planning tools, and infrastructure investment frameworks, is substantial.

The Commission should consider PRADS not merely as a housing compliance mechanism but as the foundational data layer for a connected national housing and workforce ecosystem. That is what national digital infrastructure does. It maximises the significant opportunity of digital innovation to create new options that did not previously exist.

2.4 The Coalition and Government Engagement

The breadth of support for PRADS underscores that the problem it tackles is recognised across the entire property ecosystem. Industry bodies representing developers, agents, builders, NFP's, financiers, and institutional investors have each independently concluded that the absence of a reliable compliance and data infrastructure is a structural barrier to private sector participation in affordable housing. [Their Letters of Support can be viewed on this Link](#)

At the government level, HAA is engaged with five jurisdictions at varying stages of discussion.

- **Federal Government:** HAA has submitted formal pre-budget submissions in 2024, 2025 and 2026. Discussions with the office of the Federal Housing Minister and the Federal Treasurers Office have centred on in principle support for the idea along with recognition that PRADS must be led by state and territory governments, because planning and property law is state based.
- **Victoria:** The most advanced state engagement. Discussions have included the Premier's Office, the Housing Minister's Office, the Land Coordinator General, the Valuer General, the Department of Transport and Planning, the Housing Registrar, Homes Victoria, and Development Victoria.
- **New South Wales:** NSW became the first Australian state to legislate an affordable housing register and the Responsible Housing Manager category in September 2025. It also legislated for private sector ownership and management of affordable housing. HAA introduced PRADS to the NSW Senate Inquiry on Essential Worker Housing and has maintained ongoing engagement through two parliamentary inquiry submissions and direct engagement with the Housing Registrar and Homes NSW.
- **Tasmania:** HAA has engaged with the Tasmanian Government through formal policy submissions and engagement with Homes Tasmania. The SGS Economics Give Me Shelter research, co-commissioned by HAA, has been cited in Tasmanian housing policy discussions.
- **Queensland:** In active discussion with HAA. HAA has presented the PRADS framework to relevant Queensland Government officials and discussions are ongoing.

Glenn King, former Managing Director of PEXA, has agreed to chair a national PRADS co-design working group and Homes Victoria has confirmed its interest in participation.



How PRADS Relates to the Commission's Terms of Reference

The Commission's terms of reference cover three areas: approval processes, land availability and use, and infrastructure delivery frameworks. PRADS is directly relevant to all three.

On approval processes: PRADS reduces the complexity and cost of affordable housing conditions by providing a standardised, nationally consistent compliance framework. Developers no longer need to negotiate bespoke reporting arrangements in each jurisdiction. Planning authorities specify PRADS registration as the condition, and compliance monitoring will be automated from that point forward.

On land availability and use: PRADS unlocks land by making the density bonus economic model viable. Where a site would not proceed at current zoning, a PRADS-enabled density uplift can make the numbers work, increasing effective land supply for housing by addressing underutilisation of urban land serviced by existing and planning infrastructure and limiting the need for out of sequence rezoning of additional greenfield land that is more costly to service.

On infrastructure delivery frameworks: PRADS will help generate the granular, real-time data on affordable housing stock by location, type and occupancy that governments need to align infrastructure investment (for trunk, non-trunk and enabling infrastructure) with actual housing outcomes rather than planning assumptions.



3.1 The Fragmentation Problem

The Commission's resilient economy inquiry found that regulation is most onerous when it is duplicated, overlapping or not harmonised between jurisdictions.

This observation applies with particular force to affordable housing definition and compliance. Every state and territory has different planning frameworks, different affordable housing definitions, different covenant mechanisms, and different compliance monitoring arrangements. A developer operating across multiple jurisdictions faces a different compliance obligation in each state, with no consistent standard, no shared data system, and no interoperability between state registers.

This fragmentation is an inefficiency layer and structural barrier to institutional investment in affordable housing at national scale. An institutional investor or superannuation fund seeking to build a national portfolio of affordable housing dwellings faces a different regulatory landscape in each jurisdiction.

The absence of a nationally consistent standard raises the transaction costs of building institutional housing pipelines and deters the very capital flows that the National Housing Accord is designed to attract.

3.2 How PRADS Resolves the Fragmentation Problem

PRADS will be designed to operate as a nationally consistent compliance layer that sits above state-specific planning systems. Each state Housing Registrar retains authority over enforcement within their jurisdiction. PRADS provides the monitoring infrastructure giving each Registrar real-time data and enabling national aggregation of compliance information for evidence-based policy.

This is precisely the approach to regulatory harmonisation that the Commission's resilient economy inquiry identified as effective: not the replacement of state frameworks with a federal one, but the creation of common standards and shared infrastructure that reduces duplication and complexity while preserving jurisdictional responsibility.

3.3 The NSW Legislative Model: A National Pathway Already Legislated

In September 2025, NSW enacted the Community Housing Providers (Adoption of National Law) Amendment Act 2025, the most significant reform to affordable housing regulation in any Australian state in recent years. The legislation does four things directly relevant to the Commission's inquiry.

1. First, it mandates the creation of a simple digital register of all affordable housing obligations generated through the NSW planning system (it is not intended to be an all-encompassing register as proposed by HAA). This is the foundational data infrastructure that PRADS can provide and leverage nationally.
2. Second, it creates the Responsible Housing Manager category, allowing suitably qualified private sector property managers to manage affordable housing alongside traditional CHPs. This is a landmark reform: private sector ownership and management of affordable housing will be explicitly permitted for the first time in NSW, provided the property is managed by a registered Responsible Housing Manager and recorded on the register.
3. Third, it designates the NSW Housing Registrar as the authority responsible for compliance monitoring and enforcement of affordable housing obligations. This reflects the Registrar's existing statutory powers, regulatory expertise, and established relationships with both community housing providers and the new Affordable Housing Manager category.
4. Fourth, it creates the regulatory architecture within which PRADS could operate in NSW immediately, with the register providing the compliance backbone and the private sector pathway enabling affordable housing delivery at market scale.

HAA is actively promoting the NSW model as the basis of a national standard. The Commission has an opportunity to accelerate this by recommending that all states and territories adopt frameworks consistent with the NSW legislation, and that the Federal Government endorse and fund national harmonisation through PRADS.

It is worth highlighting incentive-based funding announced through the Federal Government's 26/27 FY Budget (whereby states and territories must demonstrate meaningful supply side reforms to qualify for potential funding under the Local Infrastructure Fund) is a live opportunity for national stewardship and harmonised reforms such as PRADS.

3.4 Regulation as a Tool for Unlocking Supply

The paradox of the current system is that the absence of compliance monitoring for affordable housing obligations suppresses private investment in affordable housing, because neither government nor investors can have confidence that commitments will be honoured. A stronger, clearer, digitally monitored compliance framework unlocks more private capital for affordable housing delivery, not less because better regulation and compliance enables more supply by giving investors the certainty they need to commit.

PricewaterhouseCoopers has independently confirmed that the PRADS economic model is financially viable: planning incentives can generate sufficient value uplift to fund affordable housing subsidies without ongoing government expenditure. At scale, the model could deliver 400 to 600 affordable dwellings in a 5,000-dwelling urban regeneration precinct.

PRADS as National Digital Infrastructure

4.1 The Commission's Own Evidence

Multiple participants in the Commission's resilient economy inquiry specifically highlighted the role of technology and digital infrastructure in reducing regulatory burden and improving regulatory stewardship. CPA Australia recommended that all levels of government increase investment in technology and data infrastructure to streamline interactions between business and government, and support the development of RegTech solutions to reduce compliance costs and administrative burdens. The Commission itself noted that technology and data sharing can be enablers of better regulatory stewardship.

PRADS is exactly the kind of RegTech solution the Commission described as valuable: it will reduce the administrative burden on Housing Registrars by automating compliance monitoring, provide the data infrastructure that enables evidence-based policy, and create the regulatory certainty that promotes private investment.

4.2 The Data Value of PRADS - Shaping Future Housing Policy

One of the most significant and under-appreciated benefits of PRADS is its data value. By capturing comprehensive, verified data on affordable housing obligations and compliance outcomes across all registered properties, PRADS would give all levels of government, for the first time, a complete national picture of affordable housing stock: its location, type, occupancy rate, income bands served, tenure, covenant duration, and the relationship between planning incentives granted and affordable outcomes delivered. No such dataset currently exists anywhere in Australia. (PRADS can also be used to register other housing types, but is starting with affordable housing).

The absence of this data is itself a regulatory problem. Governments cannot measure the effectiveness of planning incentives for affordable housing. They cannot identify which local government areas are undersupplied relative to need. They cannot evaluate whether developer contribution frameworks are producing genuine outcomes. The Commission's resilient economy inquiry found that there is scope to improve measurement and assessment of regulatory burden. PRADS provides exactly that measurement for the housing sector, in real time, across every jurisdiction simultaneously.

This data capacity transforms PRADS from a compliance tool into a genuine housing policy instrument, enabling strategic, evidence-based government intervention at the granular level for the first time. It is the difference between a housing system that hopes its planning conditions are working and one that knows.

4.3 Validation by Independent Bodies

The principle behind PRADS has received independent validation from two significant external bodies. The National Housing Supply and Affordability Council specifically highlighted the PRADS approach to securing affordability obligations on title as an innovative model for registering long-term affordable housing commitments, in its State of the Housing System 2025 report.

The UNSW City Futures Research Centre, in its March 2026 report on Digital Public Infrastructure for Driving National Housing Policy Efficacy and Outcomes, cited PRADS as a concrete example of improving observability and rental transparency to drive better enforcement of rental affordability, and framed it as a candidate for classification as national Digital Public Infrastructure.

Australia's housing affordability crisis is too big for government to solve on its own. The \$290 billion investment needed, the 33,500 homes per year shortfall, and the 3.8 trillion dollars sitting in superannuation funds that cannot currently be deployed at scale into affordable housing are not separate problems. They are the same problem viewed from three angles. PRADS addresses all three simultaneously.

Enabling Private Sector Participation at Scale

5.1 Overcoming the CHP Concentration Risk

Australia's affordable housing delivery model channels virtually all government-supported affordable housing through the community housing provider (CHP) sector. Community housing providers perform a vital and irreplaceable function, particularly for social housing and supported accommodation for people with complex needs. Within their own portfolios, CHPs monitor compliance responsibly. HAA deeply respects the work of the CHP sector and does not seek to displace it. But the sector cannot be the only channel.

The CHP sector's total management capacity is a fraction of what is needed to close the 33,500-home annual shortfall. Concentration in a single delivery channel, however capable, creates systemic risk, limits competition, and produces a ceiling on supply that no amount of planning reform can lift so long as the channel remains constrained. Multiple participants in the Commission's resilient economy inquiry highlighted concentration risks in regulated sectors as a problem for competition and productivity. The same dynamic applies here. To deliver affordable housing at the scale Australia needs, the private sector must be engaged alongside the CHP sector, with a compliance and monitoring framework robust enough to give government the confidence to allow it. That is precisely what the opportunity that PRADS can provide to both the CHP sector and private industry.

The challenge is particularly acute in regional Australia, where CHPs often do not operate at all. The compliance and accountability framework that PRADS provides means that affordable housing can be introduced anywhere across Australia, managed by local private property managers who already operate in those communities, with full Housing Registrar oversight. This is not a theoretical possibility. It is the practical consequence of establishing the NSW legislative model, applied nationally.

5.2 Establishing Responsible Housing Managers and the Private Sector Pathway

PRADS is designed to work with Australia's existing property management infrastructure. Private real estate agents, property managers, and developers can participate as Responsible Housing Managers under the PRADS framework, managing PRADS-registered properties alongside their mainstream rental portfolios. This removes the need to channel all affordable housing through community housing providers, whose scale is insufficient and whose geographic footprint excludes most of regional Australia.

NSW's September 2025 legislation has created this category in that state, demonstrating the regulatory architecture is achievable and legislatively sound. HAA is actively promoting the NSW model as the national template. PRADS extends the model nationally by providing the compliance monitoring platform that enables Housing Registrars to accredit and oversee Responsible Housing Managers in each jurisdiction, with consistent standards and real-time visibility of compliance.

5.3 Addressing the Superannuation Capital and the Compliance Confidence Gap

Australia's superannuation system manages more than \$3.8 trillion in assets. Superannuation funds are potential long-term affordable housing investors: their liability profiles match the long-duration characteristics of affordable housing covenants, their scale allows diversification across property types and locations, and their fiduciary obligations to members are consistent with investment in regulated, covenant-backed affordable housing. Several major funds, including through their involvement with the Assemble and HOME build-to-rent platforms, are already exploring this space.

The obstacle is not capital. It is compliance confidence and the ability to do it at scale. By creating a verifiable, auditable compliance record accessible to government, investors, fund trustees, their legal advisers, and their regulators, PRADS can transform affordable housing from a regulatory obligation into a bankable, investable asset class.

This is the economic chain that links the Commission's regulatory reform agenda to the housing supply outcome Australia needs: better regulation enables investor confidence, investor confidence unlocks superannuation capital, superannuation capital funds affordable housing at the scale government cannot, and affordable housing at scale serves the nurses, teachers, paramedics and essential workers who cannot afford to live in the communities where they work.



HAA respectfully urges the Commission to make the following recommendations in its interim and final reports.

Recommendation 1: Establish PRADS as national digital public infrastructure for housing compliance.

The Commission should recommend that the Federal Government provide seed funding to bring the PRADS platform to operational status as national digital public infrastructure for housing, and direct The Treasury / Housing Australia to engage with HAA on PRADS as the compliance and reporting infrastructure layer for the National Housing Accord. This directly addresses the compliance and data gap that has been identified as a structural failure of the housing supply regulatory system.

Recommendation 2: Mandate covenant-based affordability obligations across all Commonwealth-supported programs.

The Commission should recommend that all new affordable housing commitments made under Commonwealth-supported programs, including the Housing Australia Future Fund and the National Housing Accord, be secured by restrictive covenants on title, rather than planning conditions alone. Title-registered covenants are legally binding, survive changes in ownership, and are monitorable through the PRADS digital register.

Recommendation 3: Designate Housing Registrars as the national accountability authority for PRADS compliance monitoring.

The Commission should recommend that state and territory Housing Registrars (or equivalent) be designated as the responsible enforcement authority for PRADS-registered affordable housing obligations in their jurisdiction, with PRADS providing the real-time monitoring and alerting platform. This preserves jurisdictional responsibility for enforcement while providing the national consistency of compliance standards that the institutional investment market requires.

Recommendation 4: Extend the Responsible Housing Manager model nationally.

The Commission should recommend that all states and territories adopt legislative frameworks consistent with NSW's Community Housing Providers (Adoption of National Law) Amendment Act 2025, enabling accredited private sector operators to manage affordable housing as Responsible Housing Managers alongside community housing providers. The Federal Government should endorse this as the national model and fund its harmonisation through PRADS. National consistency is the precondition for institutional investment at the scale the Housing Accord requires.

Recommendation 5: Commission a national co-design process to accelerate PRADS implementation.

The Commission should recommend that the Federal Government support a structured co-design process for PRADS, open to state and territory governments, Housing Registrars, developers, financiers, community housing providers, local governments, and tenant advocates. Glenn King, former Managing Director of PEXA, has agreed to chair the national co-design working group. Homes Victoria has confirmed participation. Victoria, NSW, Tasmania and Queensland are all engaged. The process is ready to begin, pending a federal mandate.

Progress only moves at the speed of trust. That is HAA's founding observation. It is also the diagnosis for why Australia's housing supply regulatory system has produced so many good intentions and so few verified outcomes. The trust gap between government, the private sector and the community in the delivery of affordable housing is real, measurable, and addressable. PRADS attempts to address this.

The Commission's terms of reference ask for actionable recommendations to lift productivity and help Australia build more homes. HAA's submission is that building more homes requires solving all three sides of the housing supply problem simultaneously: removing the regulatory barriers that prevent approvals, which the Commission is well placed to address; creating the accountability infrastructure that makes affordable housing commitments enforceable and verifiable; and generating the data that governments need to design and calibrate future housing policy intelligently. PRADS addresses the second and third of these.

Australia's housing affordability crisis is too big for government to solve on its own. The \$290 billion investment needed is real. The 33,500-home annual shortfall is real. The \$3.8 trillion sitting in superannuation funds that cannot currently be unlocked at scale for affordable housing is real. These are not problems that planning reforms alone will solve. They require the digital infrastructure of trust that converts regulatory commitments into investable propositions.

The private sector has the capital. The technological capability exists. A significant coalition of organisations spanning developers, financiers, peak bodies, local governments, economists and community housing advocates has already declared its support. The regulatory model has been legislated in NSW and is advancing in other jurisdictions. Five governments are in active discussion with HAA. What is needed now is the federal signal that converts state-by-state engagement into a nationally consistent system.

The time for waiting is over.

HAA is committed to building PRADS for the benefit of all Australians. We respectfully invite the Commission to recommend that the Federal Government make that possible.

[Redacted]



Housing All Australians