

Submission: Interim Report on Housing Supply Regulation

Thank you for the opportunity to comment on the Interim Report on Housing Supply Regulation.

I recognise the genuine problem the Commission is responding to — housing affordability has deteriorated significantly over the last two decades, and regulatory reform has a role to play. However, I believe the interim report's analysis is too narrow in scope and evidentiary base to support the sweeping upzoning agenda it recommends.

1. Transport capacity is treated as a funding problem, not a present-day reality.

The report repeatedly frames density near transport as desirable, citing survey evidence that residents would support more density “if rolled out in sequence with additional public transport.” This assumes transport capacity is something to be planned for in future, when in reality much of the existing network serving high-demand inner and middle-ring suburbs is already at or near capacity during peak periods. Directing further density toward these corridors without first demonstrating spare capacity — or a funded, timetabled plan to expand it — risks worsening outcomes for existing and new residents alike. The Commission should require any upzoning-near-transport recommendation to be tested against actual current patronage and network capacity data, not aspirational alignment.

2. Alternative growth models are absent from the analysis.

The report's reform agenda is confined almost entirely to intensifying existing metropolitan areas. There is no consideration of decentralisation, new city development, or growth of regional centres as a genuine alternative or complement to upzoning established suburbs. A report purporting to set the direction for national housing supply policy should at minimum explain why this option has been excluded, rather than omitting it altogether.

3. Infrastructure cost is acknowledged but not reconciled with the affordability objective.

To its credit, the report devotes a full chapter to infrastructure and is candid that greenfield servicing can cost tens of thousands of dollars more per dwelling than infill. But this is treated as an argument for preferring infill over greenfield, not as a broader constraint on how much additional housing can actually be absorbed without compounding costs elsewhere — water, sewer, health and education capacity all scale with population growth, and the report doesn't grapple with the extent to which infrastructure catch-up costs get passed on to end buyers or the public purse either way.

4. The case against separating residential and commercial land use is asserted, not demonstrated.

The report argues that non-residential-only zoning is “in many cases unjustified,” relying on the growth of Melbourne's mixed-use developments as evidence of success. This does not engage with the original planning rationale for separation — noise, odour, heavy vehicle

movements, and industrial nuisance — beyond asserting that built-form controls can manage amenity. If the reasons for separation have genuinely changed, the report should demonstrate that, rather than treating rising mixed-use development volumes as self-evidently a good outcome.

5. The evidentiary base is heavily weighted toward industry submissions.

The report draws extensively on submissions from developer and property industry bodies — Urban Taskforce Australia, the Property Council, UDIA and similar groups feature prominently throughout. This is not disqualifying in itself, but it should be transparently acknowledged as a limitation. I'd also caution against reading the comparative thinness of community and resident submissions as evidence of a lower care factor — production of a submission takes resources, time and often expertise that developer lobby groups have as a matter of course and most residents do not. Developer and industry lobby groups exist for one purpose: to advance the commercial interests of their members. That is a legitimate role for them to play, but it means their input should be weighted as advocacy, not as neutral evidence of what works — and the final report should make a deliberate effort to seek out and weight community, resident and local government perspectives to correct this imbalance, rather than treating their relative silence as an absence of view.

This asymmetry is reflected in the Commission's own consultation design: alongside the general “make a submission” and “make a brief comment” options, the inquiry website features a dedicated “take the developer survey” pathway, with no equivalent facilitated survey for residents, renters, or community groups. Providing a bespoke, structured engagement channel for one class of stakeholder and not others risks shaping the evidence base before submissions are even received, and should be corrected in any future stages of this inquiry.

I urge the Commission to broaden its final report to test transport-capacity claims against real network data, examine alternative growth models, more rigorously interrogate the case for merging residential and commercial zoning, and explicitly account for the asymmetry in who has the resources — and the invitation — to make submissions to inquiries like this one.

Thank you for considering my submission.