

URBANTECH PLUS

Submission to the Productivity Commission

Housing Supply Regulation Inquiry

FROM PLANNING CAPACITY TO COMPLETED HOMES

Tracking regulatory opportunity through to completed homes

Submission	Public submission to the Productivity Commission Housing Supply Regulation Inquiry (Interim Report)
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Website	https://www.urbantechplus.com
Date	September 2026
Submissions close	30 September 2026

Housing reform should be assessed by the homes it helps deliver, the avoidable delay it removes and the net benefit it creates for the community.

Executive summary

UrbanTech Plus supports the Productivity Commission's direction on broad-based planning reform, simpler and more predictable approvals, better infrastructure coordination and a stronger 'build' mindset. The Interim Report presents credible evidence that land-use controls can materially constrain housing supply. It also recognises that infrastructure and approvals must work if additional capacity is to become housing (Productivity Commission 2026a, pp. 2, 53–54, 109–110).

The Commission already depicts zoned capacity, commercial feasibility, enabling infrastructure and approvals (Productivity Commission 2026a, p. 110). It also considers reporting land readiness to identify constraints on conversion into dwelling completions (pp. 50–51). UrbanTech Plus supports that direction and proposes a practical implementation framework: common definitions, linked project records, named decision owners and evaluation through existing state programs. The Commission also notes that many approved dwellings have not been constructed because of barriers beyond approvals. The implementation question is therefore not only whether reform creates additional capacity or approvals, but whether that capacity progresses towards completed housing (Productivity Commission 2026a, pp. 113–114).

Additional development opportunity does not automatically become additional completions when downstream production is constrained. RMIT University's submission, drawing on AHURI Final Report No. 461, identifies construction capacity, market volatility and cascading bottlenecks as relevant constraints (RMIT University 2026, pp. 1–3, 8–12; Sharam et al. 2026). That evidence supports testing how planning and infrastructure reforms work through the delivery system, while retaining the Commission's planning reform direction.

Housing delivery also has several legitimate but bounded decision-makers. A planning authority can issue a development approval; a certifier can assess building compliance; an infrastructure provider can determine servicing conditions; a lender can apply finance and pre-sale requirements; and a developer can decide whether a project remains commercially viable. Each participant can perform its own role correctly while the overall housing outcome still stalls. The gap is not necessarily poor performance by one institution. It is distributed decision rights and fragmented information. The relevant state or territory planning or housing agency should coordinate the end-to-end delivery view while existing participants retain their statutory or commercial decision rights and source-data responsibilities.

UrbanTech Plus proposes a delivery test across the Commission's four principles: assess reforms by their contribution to additional completed housing, reduced avoidable delay and net community benefit. Report absolute completions alongside progression rates and elapsed time for defined project cohorts. Broad upzoning may increase completed homes while lowering the share of permitted capacity developed; that lower share is not, by itself, policy failure.

Six reforms provide the implementation framework: agree common housing readiness definitions; test the next likely constraint; link housing and infrastructure sequencing; make approvals digital by design; manage unresolved decisions through empowered coordination; and measure delivery outcomes and pipeline progression. Start with a bounded pilot under an existing state program. Test data coverage, linkage, cost and decisions improved before expanding reporting.

The purpose is not to create another dashboard. The connected view should support earlier intervention: sequence a missing infrastructure dependency, resolve conflicting referral advice, or show when an in-scope reform has shifted the binding constraint rather than removed it.

The longer-term aim is a connected delivery view showing what is permitted, supported by committed or available infrastructure, approved and under construction. Commercial feasibility should be treated as contextual analytical information under dated assumptions, not a mandatory project-status field; unknown is an acceptable result where reliable information is unavailable. Separate construction completion from lawful occupation readiness. Existing institutions can lead this work without a new national approval body or mandatory software platform.

Proposed delivery test: Assess additional completed housing, avoidable delay and net community benefit across the delivery system.

Recommendations at a glance

Recommendation	Purpose	Start now	Build towards
1. Agree common housing readiness definitions	Distinguish planning capacity, readiness conditions and delivery milestones.	Audit data coverage and map available records; no new approval or applicant return.	A spatial, time-based view of what can realistically be delivered and when.
2. Test the next likely constraint	Identify what a reform removes, what becomes binding next and how the effect will be measured.	Add the test to major planning, infrastructure and approval reforms.	Periodic identification of emerging constraints using observed cohort data.
3. Integrate housing and infrastructure	Tie infrastructure funding and sequencing to specific housing capacity and delivery windows.	Publish intended capacity, timing, owner and dependencies; avoid double-counting shared capacity.	Scenario analysis that compares infrastructure choices by housing unlocked and timing.
4. Make approvals digital by design	Connect authoritative data, structured rules and reusable evidence through common governance and interoperability standards.	Agree common definitions, identifiers, source responsibilities, data fields, evidence requirements and rule ownership.	Federated, interoperable workflows with machine-readable rules, routine pre-checks and auditable cross-agency decisions.
5. Manage decision closure	Give coordination bodies a shared unresolved-issues view, named owners and a defined escalation pathway and authority.	Use existing bodies and parallel referrals where dependencies permit.	Fewer reopened issues, conflicting referrals and avoidable decision loops.
6. Measure delivery outcomes and pipeline progression	Report absolute completions, cohort progression, elapsed time and known stall reasons.	Test record linkage and minimum measures through a bounded pilot.	Continuous visibility of where housing capacity accumulates, stalls or converts.

Responses to the Commission's information requests

The Interim Report sets out a series of numbered information requests. UrbanTech Plus responds below where a delivery, governance and process perspective is most relevant. Supporting reasoning appears in the sections referenced. UrbanTech Plus does not respond to requests on Aboriginal and Torres Strait Islander housing, development cost stacks by typology, specific approval requirements and referrals, or developer contribution design, where other participants hold stronger evidence.

Information request	UrbanTech Plus response
1.2: Are the best-practice principles and overarching objective appropriate?	Supported, including the overarching net community benefit objective. Apply a delivery test across the four principles: assess additional completed housing, avoidable delay and wider benefits and costs. Use absolute completions with time-bound cohort progression and elapsed time. A lower share of permitted capacity developed does not by itself indicate policy failure (section 3).
2.2: Would it be helpful for governments to report a land measure distinguishing zoned, serviced, approved, infrastructure-ready and commercially feasible land? Can you provide examples of released land that has not been developed?	Yes. Agree on common definitions for land readiness and project milestones, then link records through commencement and completion. Distinguish infrastructure commitment from availability, and completion from lawful occupation readiness. This submission does not provide an independently verified project example of released land that has not been developed. The initial task is to test existing records for coverage, linkage and recorded reasons for delay (sections 4 and 9).
2.3: What are the expected impacts of land-use reforms on zoned capacity, commercially feasible capacity and other measures of supply?	UrbanTech Plus provides no quantitative estimate of the effects of particular land-use reforms or its own proposals. Evaluate capacity uplift alongside observed delivery, the assumed period and likely subsequent constraints. Additional permitted capacity can be beneficial even if its percentage conversion falls. Local evidence and credible modelling can support estimates before national reporting is standardised (sections 5 and 13).
3.3: Is improving coordination a higher or lower priority than reducing approval requirements? What features make coordination bodies successful?	First assess whether a requirement is necessary; removing an unjustified requirement may also remove the conflict. For necessary requirements that remain, effective coordination needs authority to resolve or escalate conflicting advice, a shared issues register, named owners and target dates. Prioritise changes by expected costs and benefits rather than assuming coordination is always the higher priority (section 8).

3.4: What are the best ways to enhance how states and territories track the timing and burden of approvals? How effective has technology including AI been?	Measure referral cycles, repeated information requests, reopened matters and days awaiting external input alongside elapsed time. Distinguish avoidable rework from legitimate reconsideration. This submission provides no independent evaluation of AI performance. Agree governance and data standards, then test accuracy, exceptions and human override for selected objective checks before expanding automation (sections 7 and 9).
4.1: What reforms are required to infrastructure planning and coordination to support more timely utility connections? To what extent is there misalignment of incentives between each level of government and infrastructure service providers?	Treat utility connection capacity, prerequisites and expected availability dates as explicit dependencies in the common delivery view. Where several providers are involved, maintain one dependency view while each utility retains its existing decision rights. Use the shared view to expose sequencing conflicts and unresolved dependencies without transferring statutory responsibility (section 6).
4.2: What feedback do you have on the reform directions for infrastructure planning?	Supported, with one addition. Infrastructure programs should publish the housing capacity an investment is intended to unlock, the expected release window, responsible parties and the dependency set, then report realised progression against it. Where several assets are jointly necessary for the same dwellings, the dependency should be reported at program level so the same capacity is not counted against multiple assets (section 6).
4.5: Are the proposed roles for the Australian Government useful and appropriate? What other roles should be considered?	The Commonwealth can support common definitions, data standards and comparable evaluation while jurisdictions retain delivery and approval powers. Funding conditions should relate to agreed milestones within recipients' control, with completions informing overall program evaluation. Account for commercial and market influences before attributing results or determining funding consequences (sections 7, 9 and 13).
5.1: Which reform directions are easy or hard to implement? Are there quick wins, co-dependencies or sequencing considerations?	Begin with data mapping and a bounded pilot in an existing program. Governance, definitions and source responsibilities should precede wider integration and automation. Availability of each proposed field must be tested; unknown reasons should remain visible. Evaluate first-year data quality, cost and decisions improved, then assess delivery effects over suitable periods (sections 10 and 11).

1. Purpose, scope and strategic position

The Commission's Terms of Reference seek actionable reforms across approval processes, availability and use of land, and housing-enabling infrastructure. They also ask the final report to assess best practice, estimate impacts where possible and provide implementation advice. This submission is directed to those tasks.

UrbanTech Plus agrees that restrictive land-use controls can prevent housing that would otherwise be considered and accepts broad upzoning as an important reform direction. The Commission also recognises that many upzoned sites may not be commercially feasible in the short run, that infrastructure is often the main greenfield constraint, and that faster approvals alone will not be sufficient. Those qualifications strengthen, rather than weaken, the case for an end-to-end implementation framework.

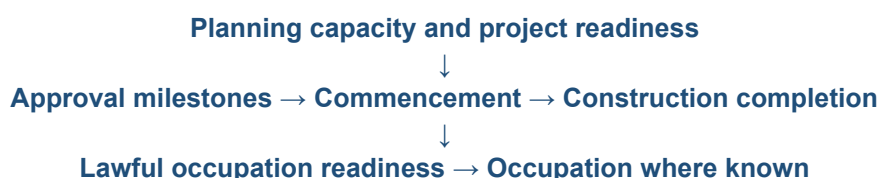
The submission does not ask the Commission to redesign tax, monetary policy, construction finance, workforce policy or the National Construction Code. Where these factors affect whether lawful capacity proceeds, they are treated only as diagnostic constraints so that the impact of in-scope reforms is not overstated.

About UrbanTech Plus

UrbanTech Plus is an Australian advisory business focused on decision assurance, digital transformation and delivery across the built environment and local government. This submission applies a practical delivery and process perspective to the Commission's regulatory reform agenda.

2. Put the Commission's housing supply framework into practice

Figure 5.1 of the Interim Report identifies zoned capacity, commercial feasibility, enabling infrastructure and approvals as factors that help land become housing-enabled and homes approved and built. The report also considers a developable-land measure to identify constraints on conversion into dwelling completions (Productivity Commission 2026a, pp. 50–51, 110). UrbanTech Plus proposes how to implement that direction through common definitions, linked records and accountable follow-up.



This is a simplified reporting view, not a prescribed sequence or additional approval pathway. Feasibility, infrastructure and approvals may develop in parallel, and readiness can change. Record approval milestones separately from time-stamped conditions such as commercial feasibility and infrastructure availability. The working definitions in section 4 support consistent reporting while allowing legitimate jurisdictional differences.

Conversion means the share of dwellings in a defined project cohort reaching a specified milestone within a stated period. Report the number of dwellings, the observation period and elapsed time as well as the rate. Potential or permitted capacity is planning context, not a target for full development. A larger permitted-capacity denominator can lower its conversion share even when more homes are completed.

This submission uses construction completion as the core comparable endpoint under a published definition. Record lawful occupation readiness separately where the relevant evidence is available, and actual occupation as a supplementary outcome where reliable information is available. These events must not be treated as interchangeable.

3. Apply a delivery test across the best practice principles

The Commission proposes four principles: adopt a build mindset; regulate only where necessary; coordinate with infrastructure; and keep the process simple. Its overarching objective is to meet housing needs where doing so delivers the greatest net community benefit, balancing economic, social, cultural and environmental outcomes (Productivity Commission 2026a, pp. 23–24). UrbanTech Plus supports that objective and all four principles. The final report should apply an explicit delivery test across them, whether or not it is labelled a fifth principle.

Assess reforms by their contribution to additional completed housing, reduced avoidable delay and net community benefit across the delivery system.

A faster approval can reduce cost and uncertainty even where a project does not immediately proceed. Conversely, an increase in approved capacity may expose a subsequent servicing, feasibility or construction constraint. Report these intermediate benefits alongside absolute completions, cohort progression and elapsed time. Completion counts or conversion rates alone cannot establish whether a reform succeeded or whether its benefits exceeded its costs.

Principle	What it improves	Delivery test
Build mindset	Creates lawful housing opportunity.	Report additional permitted capacity alongside observed delivery; avoid a target for full conversion.
Regulate where necessary	Removes avoidable restrictions and burden.	Measure realised throughput and identify the next constraint.
Coordinate with infrastructure	Connects development with enabling services.	Tie funding, timing and responsibility to housing capacity that becomes usable.
Keep the process simple	Makes decisions timely and predictable.	Measure end-to-end elapsed time, RFIs, referrals and reopened issues.
Delivery test	Tests delivery within the net community benefit objective.	Assess absolute completions, cohort progression, avoidable delay and wider benefits and costs.

4. Recommendation 1: Agree common housing readiness definitions

Governments should distinguish project milestones from conditions affecting readiness. The definitions below are for management and reporting. They create no new approval, entitlement or permission to proceed. Each record should identify the site or project, dwelling count, source, observation date and confidence or known limitation.

Response to Information Request 2.2: Adopt common definitions for land readiness and project milestones, then link the available records through commencement and completion. Record lawful occupation readiness separately where evidence permits.

Reporting item	Working definition
Potential capacity	Planning estimates of possible housing capacity, with modelling assumptions and date. This is context rather than a target for full development.
Permitted capacity	Housing form or density allowed by current planning controls. Record the method and assumptions used to estimate dwelling capacity.
Commercial feasibility	Contextual analytical information under stated market and cost assumptions. Identify whether modelled or supported by project evidence. This is not a mandatory project-status field; record unknown where reliable information is unavailable.
Infrastructure committed	Required works have identified funding and delivery dates. Commitment does not establish that services are available.
Infrastructure available	Required infrastructure is operational and usable for the relevant development stage, subject to documented connection requirements.
Approval milestones	Record planning approval and building or construction approval separately, where applicable, with dwelling counts, conditions, dates and expiry.
Delivery readiness	A dated summary of known planning, infrastructure, site and delivery dependencies. Show unresolved and unknown items; this is not an approval or guarantee of commencement.
Commencement	Physical construction has started under the published jurisdictional or statistical definition.
Construction completion	Construction is complete under the published source definition. This does not automatically establish lawful occupation readiness.
Lawful occupation readiness	Required occupation authorisation and relevant prerequisites are satisfied, evidenced under the applicable jurisdictional arrangements.
Occupation	Actual occupation where reliable information is available; report separately from completion and lawful readiness.

Commercial feasibility should remain contextual analytical information rather than a new reporting gate. Where reliable evidence is unavailable, record unknown rather than infer infeasibility from project inactivity.

Start now

Audit existing state and local data for coverage, identifiers and lawful linkage. Map available fields to the common definitions and publish gaps. Do not require applicants to seek a new readiness status or supply a new reporting return for the initial pilot.

This builds on existing practice. NSW's Urban Development Program monitors housing development, land supply and infrastructure delivery, while its housing supply dashboard reports dwellings lodged, approved for development, approved for construction and completed. Regional NSW work also describes the pipeline from rezoning and servicing through approvals to home completions. Queensland programs likewise use 'development-ready land'. The reform is therefore a minimum common taxonomy and comparable measures, not a new statutory concept.

Build next

Use a short set of reason codes with an explicit unknown category. Distinguish a reason documented in an agency record, reported by a participant, or inferred for analysis. Publish the basis and confidence of each classification, and the assumptions behind forecasts of housing delivery.

Future capability

The connected view should help estimate how much housing may be completed within a nominated period and identify known dependencies. Forecasts should state their assumptions and uncertainty; unobserved commercial decisions should remain unknown.

5. Recommendation 2: Test the next likely constraint

When designing or evaluating a major housing reform, government should state the constraint it seeks to remove, the expected delivery mechanism, the next likely constraint and the evidence needed to assess results. This is a proportionate decision discipline, not a new approval requirement or a claim that one binding constraint can always be identified.

Test the next constraint: If this constraint disappeared tomorrow, what would then stop additional homes from progressing to completion?

The Commission recognises that land-use controls can be an initial constraint and that some upzoned sites may remain commercially infeasible. The proposed test follows that logic into implementation. Where a likely constraint sits outside the inquiry's remit, disclose it and its uncertainty without expanding the reform's scope.

Start now

Add a one-page test to major planning, infrastructure and approval reforms: constraint being removed; evidence; expected conversion mechanism and estimated range where quantification is credible; next likely constraint; dependencies; confidence level; and the post-implementation measure.

Build next

Compare forecast and observed progression over suitable periods. Investigate differences using project mix, market conditions and recorded dependencies. A change in progression identifies a question to investigate; it does not establish that the reform caused the change.

Future capability

Use delivery evidence to identify emerging bottlenecks by place and dwelling type, and assess interventions against their expected housing contribution, costs and wider community benefits.

6. Recommendation 3: Integrate housing and infrastructure delivery

The Commission is right to make housing-enabling infrastructure a high priority. The next step is to make the link between infrastructure and housing explicit in the same delivery view. For major growth areas, plans should identify the dwelling capacity an investment is intended to unlock, when that capacity becomes usable, the responsible organisation, the funding source and the remaining dependencies.

This approach is already emerging. The Queensland and Australian governments' Infrastructure Activation Fund is a joint initiative of nearly \$2.4 billion committed over five years, intended to unlock or accelerate 51,368 homes over an eight-year delivery window (Economic Development Queensland 2026). These are program figures, not realised completions. The relevant discipline is to record the capacity an investment is intended to unlock and the period in which it is expected, then track whether that capacity progresses to delivery-ready status, commencement and completion. NSW's Urban Development Program similarly uses housing-pipeline data to coordinate infrastructure and housing delivery. These programs show that the recommended direction can build on existing institutions rather than create a new bureaucracy.

Start now

Require major housing-enabling infrastructure programs to report the housing capacity they are intended to unlock, the expected release window, responsible delivery parties and remaining dependencies. Where several infrastructure assets are jointly necessary for the same housing capacity, report the dependency set at program level so the same dwellings are not double-counted against multiple assets.

Build next

Use common spatial data standards and program-level sequencing across state agencies, councils and service providers. Where multiple agencies are involved, maintain one dependency view rather than unreconciled agency schedules.

Future capability

Allow decision-makers to compare infrastructure options by the amount and timing of delivery-ready housing they unlock, while still applying ordinary benefit-cost, resilience and community-service tests.

7. Recommendation 4: Make approvals digital by design

The Commission already supports digitisation, technology and AI-assisted approvals and identifies PlanSA, myLot and the NSW Planning Portal as examples of current reform (Productivity Commission 2026a, pp. 77–82). UrbanTech Plus supports that direction but recommends a stricter implementation sequence: governance and standards first, data and rules second, automation third.

Effective integration depends on governance and interoperability as well as technology. Agencies hold substantial housing delivery information, but definitions, identifiers, spatial references, update cycles, access rules and source responsibilities may differ. Existing systems can be connected where these foundations and technical capability are sufficient. For priority approval pathways, this requires:

- authoritative cadastral, planning, hazard and relevant infrastructure datasets with named data owners
- structured and machine-readable rules where requirements are sufficiently objective
- one controlled project record with version history and auditable changes
- reuse of verified information rather than repeated manual entry and rechecking
- pre-lodgement checking for objective requirements and missing evidence
- parallel referral where dependencies do not require serial assessment
- transparent issue, evidence and decision records
- accountable human judgement for discretion, exceptions and material uncertainty.

Government should specify the required information and interoperability outcomes, not a technology product. A minimum framework should define common terms, persistent site and project identifiers, authoritative source responsibilities, spatial and data standards, minimum fields, readiness states, access controls, update obligations and rules for resolving conflicting information. Once those foundations are in place, jurisdictions can connect existing and future systems using fit-for-purpose technologies.

AI may assist search, explanation, triage and checking. It should not be the policy proposition. Ambiguous rules and poor data do not become authoritative because an AI system processes them quickly.

Start now

Standardise common data fields and evidence requirements for priority housing pathways; remove duplicate requests for information already held by government where lawful; publish data dictionaries and rule ownership; and measure RFI and re-entry rates.

Build next

Connect existing systems through agreed interoperability standards, convert suitable objective rules into machine-readable form and allow verified evidence to flow between agencies and stages without reformatting. Evaluate accuracy, exceptions and human override before expanding automation.

Future capability

Applicants and agencies should work from a connected view of authoritative information, with routine checks automated and professional judgement reserved for matters that genuinely require it. Source agencies should remain responsible for their authoritative data while agreed standards allow information to be combined for end-to-end delivery decisions. The target is an interoperable decision environment, not a mandated national software product. Access should be role-based and lawful, and project-level commercially sensitive feasibility information should not be publicly disclosed.

8. Recommendation 5: Manage decision closure, not only statutory time

Elapsed approval time matters, but a single statutory clock can hide late referrals, repeated information requests, conflicting advice, changed requirements and matters reopened after an earlier decision. The Commission already recommends coordination bodies with decision-making power where agencies conflict (Productivity Commission 2026a, pp. 75–82). UrbanTech Plus recommends adding an explicit closure discipline to that model.

Every unresolved matter should have an owner, the evidence needed, its dependencies, a target decision date, an escalation path and a closure status.

Queensland's State Assessment and Referral Agency provides an established whole-of-government state referral function, while the Commission notes that coordination bodies are less effective when they cannot resolve conflicting advice (Productivity Commission 2026a, pp. 75–76; Queensland Government 2026). The reform should therefore use existing coordination bodies where possible, but make decision rights and escalation explicit.

Illustrative stakeholder evidence: statutory time did not equal decision closure

Brief Comment 11 to this inquiry describes a 2024-25 family subdivision application in which council officers gave conflicting stormwater advice, multiple civil-engineering plans were prepared, records of council-installed drainage works could not be located, and amendments were reportedly overlooked as the authority approached its regulatory timeframe. The commenter states that the application was approved with disputed conditions and a short appeal window. This is one stakeholder account, not a generalisable finding, but it illustrates the failure mode the closure discipline is intended to expose: a statutory determination can occur while substantive issues remain unresolved or poorly coordinated. The Commission separately reports that poorly coordinated referrals can generate conflicting advice and significant delay (Productivity Commission 2026a, pp. 65-66; Productivity Commission 2026c, Comment 11).

Separate decision rights and shared delivery visibility

Housing delivery is spread across parties with legitimate but bounded responsibilities. A council can determine a development application without owning project finance or pre-sales. A private certifier can assess building compliance without controlling planning, servicing or commercial viability. An infrastructure provider can apply network-capacity and contribution requirements. A lender can apply finance and risk conditions. A developer can decide not to proceed because the project no longer stacks up. Every decision can be reasonable, yet the homes can still fail to be delivered. The system problem is distributed decision rights and fragmented information. The relevant state or territory planning or housing agency should coordinate the system view of why approved capacity progressed or stalled, while each participant retains its bounded role.

Participant	Bounded responsibility and what remains outside it
Planning authority / council	Determines planning applications and council-controlled conditions. It does not control project finance, pre-sales, private certification, market demand or the developer's final commercial decision.
Private building certifier / building approval authority	Assesses building compliance within its statutory role. It does not control planning strategy, infrastructure funding, lending conditions or project sales.
Infrastructure / utility provider	Determines network capacity, servicing requirements, connections and relevant contributions. It does not determine project feasibility, finance or sales.
Lender / financier	Sets finance, risk and often pre-sale conditions. It does not control planning decisions, infrastructure delivery or building certification.
Developer / proponent	Owns the commercial decision to proceed, redesign, defer or abandon the project. It does not control agency decisions, network capacity or lender policy.
Construction / occupation authority	Verifies the relevant construction and occupation evidence at the end of the process. It does not own upstream planning, finance, servicing or commercial constraints.
System view	No one participant needs the complete delivery chain to discharge its own role. The relevant state or territory planning or housing agency should coordinate visibility of the system outcome while existing participants retain their statutory and commercial decision rights and source-data responsibilities.

Start now

The relevant state or territory planning or housing agency should coordinate visibility of the system outcome, not assume responsibility for every project outcome. Existing parties should retain their statutory and commercial decision rights. For priority housing pathways, that agency should coordinate one unresolved-issues and dependency view across participating agencies, identify decision owners early and use parallel referral where dependencies permit. Coordination bodies should have an agreed mechanism to resolve or escalate conflicting agency advice.

Build next

Report decision cycles, reopened matters, duplicate information requests and days awaiting external input alongside total elapsed approval time. Distinguish avoidable reopening from legitimate reconsideration triggered by material new evidence or a material project change. This extends, rather than replaces, the Commission's proposed approval performance reporting.

Future capability

The shared delivery record should show when existing milestones are met, which material dependencies remain unresolved, who owns each decision and the evidence on which it was made. It should create no additional permission to proceed.

9. Recommendation 6: Measure delivery outcomes and pipeline progression

The Commission proposes stronger performance reporting for approvals, including end-to-end approval time where possible, and considers land-readiness reporting linked to completions (Productivity Commission 2026a, pp. 50–51, 75–82). The following measures would support implementation. Use consistent dwelling units and defined cohorts rather than dividing unrelated annual totals for approvals and completions.

Reporting focus	Question	Suggested measure
Planning capacity	What opportunity exists under current controls?	Report potential and permitted dwelling capacity with method and date. Do not set a target to maximise the share developed.
Application to approval	How are proposals assessed?	Dwelling counts and approval rates for defined application cohorts; elapsed-time distributions; RFIs, referrals and appeals.
Approval to commencement	How many approved dwellings start, and when?	Follow approval cohorts in dwelling units; report observed starts, lags, unresolved dependencies and unknown reasons.
Commencement to completion	How many started dwellings complete, and when?	Absolute completions and cohort completion rates; elapsed time, partial completion and remaining work in progress.
Completion to lawful readiness	When can completed dwellings lawfully be occupied?	Separate dates and elapsed time where evidence is available; identify source and coverage.
Lawful readiness to occupation	Are dwellings occupied where this can be observed?	Supplementary occupation measure only where reliable information is available.

Start now

NSW's housing supply dashboard reports lodged dwellings, development approvals, construction approvals and completions. Victoria's Planning Permit Activity Reporting System captures permit activity, processing time, further-information requests, referrals, objections and appeals. These are useful starting points. The pilot should test which records can be linked and which stall reasons are actually recorded, rather than assume all proposed measures are available.

Build next

Follow defined project cohorts over published observation periods. Record the original and revised dwelling counts, and account for amendments, expiry, withdrawal, partial completion and project splits or mergers. Link predecessor and successor records to prevent double-counting. Publish coverage, unmatched records and reasons for exclusion. Compare like typologies and periods, recognising differing delivery lags and market conditions.

Future capability

Government should be able to identify where housing is progressing or accumulating, investigate known delays and assess which in-scope action may improve delivery. Absolute completions, elapsed time and cohort progression should be considered together.

Why linked delivery reporting needs testing

Agencies hold substantial information about individual delivery stages, but its coverage, consistency and suitability for linked reporting need to be tested. Planning authorities record applications and decisions; building systems record approvals; infrastructure providers manage servicing and asset programs; and statistical collections record construction activity. Lenders and developers hold additional commercial information that government may not possess or be entitled to access. The first task is to map what is available and link it lawfully. Non-commencement alone must not be used to infer financing failure, infeasibility or land banking.

Governance, custody and reporting burden

The relevant state or territory planning or housing agency should coordinate the common delivery view. Councils, utilities, infrastructure agencies and other source organisations should remain custodians of their authoritative data. A minimum common data dictionary and interoperability standard should define identifiers, readiness states, update responsibilities, access controls and reason codes. This avoids a new national database or any transfer of statutory ownership of source information.

Initial implementation should use existing administrative records and publish unavailable fields as gaps. Costs may include data mapping, linkage, staff time, governance and reporting changes, and should be estimated before the pilot

starts. Evaluate those costs against decisions improved and duplication avoided. No new mandatory developer return is proposed for the pilot; any later reporting obligation would require separate justification of its cost, benefit and legal basis.

10. Sequence implementation around evidence and capability

Horizon	Priority actions	Implementation principle
0–12 months: do now	Audit data coverage and access; agree minimum definitions and source responsibilities; select a cohort and program lead; cost a bounded pilot; test existing record linkage and shared dependency reporting.	Use existing institutions and records. Publish gaps and unknown reasons. Evaluate cost, linkage quality and decisions improved before expansion.
1–3 years: build next	Link existing systems and administrative data where lawful; agree interoperability and spatial standards; encode objective rules for selected pathways; strengthen coordination bodies; measure decision recycling and conversion.	Targeted governance and digital reform, proven through existing state programs. Standards and decision rights precede technology integration.
3–5 years: future capability	Federated spatial and time-based delivery view; routine automated checks; scenario analysis; constraint detection; end-to-end conversion reporting.	Federated and interoperable decision environment, preserving jurisdictional powers, source-data custody and human accountability.

Two implementation traps should be avoided. First, do not create a new national approval body where existing institutions can work with clearer interfaces and accountability. Second, do not procure a large technology platform before agreeing governance, definitions, authoritative source responsibilities, identifiers, data standards, decision rights, interoperability and measures of success.

11. Use existing programs as test beds before scaling

Begin with a defined cohort or approval pathway in an existing state program, subject to the program owner's agreement. The relevant state planning or housing agency should appoint a lead and prepare a costed pilot with a spending limit, participating data custodians, lawful access arrangements and minimum measures. Specify the decisions it will support, such as sequencing a shared infrastructure dependency or escalating conflicting referral advice. The programs below are candidate test beds, not agreed participants.

Candidate program or reporting system	Why it is useful	What to test
NSW housing supply dashboard / Urban Development Program	Monitors and coordinates land supply, infrastructure and the housing pipeline, with current reporting on lodgements, approvals, construction approvals and completions.	Test linkage of a defined project cohort, data coverage, readiness definitions and observed stall reasons.
Queensland Infrastructure Activation Fund, including selected PDA and other growth-area cohorts	Joint Australian and Queensland government initiative of nearly \$2.4 billion, with program figures for development-ready land and 51,368 homes intended to be unlocked or accelerated over eight years.	Test infrastructure-to-housing sequencing, dependencies and realised delivery windows.
Existing approval reporting and coordination bodies	The PC identifies Victoria's permit reporting and Queensland SARA as useful existing reporting and coordination building blocks.	Test decision closure, referral cycles, RFI measures and digital data reuse.

Within twelve months, assess record coverage, linkage quality, implementation cost, duplication avoided and documented decisions improved. Use that evidence to continue, revise or stop the pilot. Evaluate delivery effects over a period suited to the projects involved. A new dashboard alone is not evidence of success.

12. Scope and safeguards

- Retain broad planning reform and legitimate safety, environmental, amenity and community protections. Assess delivery improvements within the Commission's net community benefit objective.
- Preserve existing statutory and commercial decision rights and source-data responsibilities. State agencies coordinate shared visibility through existing institutions; the proposal requires no national approval body or mandatory platform.
- Use lawful access controls and protect confidential commercial information. Estimate feasibility using transparent, dated assumptions or suitable aggregated evidence, and distinguish estimates from verified project information.
- Keep readiness reporting non-statutory, time-stamped and reviewable. It must not become an additional gate to an otherwise lawful project.

- Maintain accountable human judgement for discretion and exceptions. Factors outside this inquiry, including tax, finance, workforce and NCC settings, may explain constraints but are not reform proposals in this submission.

13. Evidence, limitations and evaluation

The Commission provides evidence on land-use reform, commercial feasibility, infrastructure coordination, approval processes and performance reporting. RMIT's submission draws on AHURI research identifying production constraints and cascading bottlenecks (RMIT University 2026; Sharam et al. 2026). These sources support the need to understand delivery as a connected system; they do not validate the specific framework proposed here.

RMIT proposes a fifth principle focused on long-term construction-system capability. UrbanTech Plus proposes a complementary implementation test within this inquiry's scope: assess delivery and net community benefit across the existing principles. The Interim Report already addresses feasibility, infrastructure and conversion to completions. The contribution here is the proposed reporting definitions, decision responsibilities and staged pilot.

The common definitions, next-constraint test and staged implementation plan are UrbanTech Plus proposals. Linked records can improve investigation and evaluation, but do not establish causality by themselves. Where reform effects are claimed, use suitable comparison groups or other proportionate evaluation methods that account for market conditions, project mix and delivery lags. Where a reform is expected principally to accelerate housing delivery, evaluation should, where practicable, compare observed progression with a credible no-reform counterfactual rather than attribute subsequent completions automatically to the reform (Sobyra 2026). Nationally comparable data would strengthen evaluation; credible local studies and modelling can estimate benefits before that exists. This submission makes no estimate of additional homes caused by its proposals.

Measure	What to report	Direction of improvement
Housing output	Absolute commencements and completions, with geography, dwelling type and period.	Additional housing considered alongside net community benefit; report causal effects only where supported.
Cohort progression	Share of dwellings in a defined cohort reaching a milestone within a stated period.	Faster or more reliable progression where appropriate; never maximise the share of all zoned capacity built.
Elapsed time	Distribution of time between milestones and days awaiting specific input.	Less avoidable delay while retaining necessary assessment and safeguards.
Decision rework	RFIs, reopened matters, duplicate requests and referral cycles.	Fewer avoidable loops; distinguish legitimate reconsideration.
Infrastructure delivery	Committed and available capacity, dependencies, dates and observed housing progression.	Better sequencing and use of infrastructure, without counting shared capacity twice.
Data and forecast quality	Coverage, unmatched records, unknown reasons, reuse and forecast error.	More reliable evidence at proportionate cost; publish limitations.

14. Implementation risks and responses

The proposed reporting must justify its cost and avoid misleading incentives. The following risks should shape the pilot and its evaluation.

Objection	Response
Reporting could reward misleading classifications or penalise broad upzoning.	Publish definitions, timestamps and uncertainty. Reconcile source records and use proportionate independent quality checks. Pair absolute completions with cohort rates and elapsed time. More permitted capacity can lower its percentage conversion while increasing housing output.
The required records may be incomplete or costly to link.	Audit coverage before committing to integration. Start with a defined cohort and minimum fields. Publish unknown reasons and unmatched records; do not infer commercial failure from inactivity. Compare implementation cost with decisions improved and duplication avoided.
Many stalls may involve finance, demand or construction capacity outside this inquiry.	Record known constraints and uncertainty without transferring responsibility. This helps investigate how in-scope reforms interact with other conditions. Monitoring does not establish causality; claims about reform effects require suitable evaluation.
Councils could face additional workload.	The state program lead should cost the pilot and agree responsibilities with participating custodians. Use existing records and avoid new applicant returns. Modest additional work may be justified by larger benefits; scale only where evidence supports the net benefit.
The reporting may cost more than the decisions it improves.	Within twelve months, assess coverage, linkage quality, implementation cost and documented decisions improved. Continue, revise or stop on that evidence. Assess housing effects over a period suited to the cohort, rather than treating a first-year dashboard or completion count as decisive.
Shared visibility could blur statutory and commercial responsibility.	Each participant retains its decision rights and source responsibilities. The state lead coordinates visibility and escalation within existing powers. No reporting classification creates an additional approval, liability transfer or guarantee of delivery.

15. Conclusion

The Productivity Commission has already identified the major regulatory levers and begun to describe them as a sequence. It has also asked whether governments should distinguish on-paper capacity from land that is serviced, approved, infrastructure-ready and commercially feasible. UrbanTech Plus recommends turning that direction into an explicit delivery discipline and extending measurement through commencement and completion.

Start with common definitions, a data-coverage audit and a bounded pilot under an existing state program. Test whether linked information improves infrastructure sequencing, resolves avoidable decision loops and supports more reliable forecasts before expanding it.

The longer-term destination is a governed, interoperable housing delivery environment in which decision-makers can see what is permitted, serviced, approved, delivery-ready and under construction, with commercial feasibility treated as dated analytical context rather than a mandatory status. The relevant state or territory planning or housing agency should coordinate that system view and identify which intervention is most likely to improve delivery in a particular place and period. Councils, certifiers, infrastructure providers, lenders and developers retain their existing responsibilities.

The objective is a regulatory and infrastructure system that supports additional completed homes, reduces avoidable delay and delivers net community benefit.

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