

25 September 2026

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Commissioners
Productivity Commission
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Dear Commissioners

Submission: Interim Report on Housing Supply Regulation Inquiry

Thank you for the opportunity to provide industry's comments to the Interim Report on Housing Supply Regulation (Regulation Inquiry).

About UDIA National

The Urban Development Institute of Australia (UDIA) National is the housing development industry's oldest representative peak body with over 2,000 member organisations – spanning top tier global enterprises, professionals, small to large-scale & institutional developers as well as state agencies, and a national network of local governments.

UDIA's members, deliver new homes across the housing continuum, including the majority of affordable housing.

The Development and Construction industry is 10.5% of GDP (\$269.7bn) & 10% of fulltime employment. Each housing dollar supports 40+ sectors and generates \$2.90 in the wider economy.

The Interim Report

UDIA National welcomes the Interim Report findings and strongly supports the direction identified by the Productivity Commission (PC).

As we noted in our previous submission and the roundtables, a planning system that rezones land but does not sequence infrastructure, imposes uncommercial built form controls, duplicates agency approvals, delays post-consent clearances, or brings forward large costs before revenue is available, will not deliver the homes we need.

We are pleased the Interim Report reflects the UDIA National approach.

The interim report also validates the principal argument in UDIA's original submission. Housing delivery depends on a reliable pipeline from strategic land identification and zoning through infrastructure planning, statutory approvals, subdivision, servicing and title registration.

A site may have theoretical capacity under a planning scheme and still be incapable of delivering housing within a reasonable period. Each State and Territory's regulatory performance should therefore be assessed against the on-the-ground & realised delivery of new homes the system can deliver, rather than zoned capacity alone.

We have dealt with the information requests on an exception basis in the Appendix for any issues not yet covered off – **We are pleased to confirm that the answers to many of the information requests were provided in the detail of our previous submission of 15 June 2026.**

The submissions should be read in concert.

We note up front, that many of the information requests also relate to data and information Australia should be collecting and monitoring on an ongoing basis.

As an overall general recommendation we suggest prioritising:

- 1) Publishing headline national datasets on performance across planning/environmental approvals and infrastructure to unlock housing.
- 2) Implementing metrics & KPI's on **all** government agencies impacting housing – including housing targets, affordability & measure processes across planning, infrastructure & environmental approvals.

We are extremely pleased that leading performance metrics and KPI's feature in your detailed recommendations for determination of development conditions and infrastructure planning.

Our recommendation above relates to the opportunity to ensure housing targets and affordability is considered across all Government decisions that touch housing through clear & consistent metrics & KPI's.

We appreciate the PC has heard industry on crucial points in its Interim Report, namely:

- 1) Australia does not build enough homes where people want to live.
- 2) Regulation limits housing development and constrains supply.
- 3) Land-use controls prevent housing builds and limit the form it can take – relax these controls for more supply.
- 4) Lack of coordinated Infrastructure & service provision planning which constrains building housing supply.
- 5) Slow & complex approvals delay housing and make projects unviable.
- 6) The PC's way forward is to adopt a "build mindset", regulate only where necessary, coordinate infrastructure & keep the process simple.

The final report should also emphasise more fully the following crucial matters:

- 1) Planning reform will produce limited housing unless governments test whole of project feasibility and remove the infrastructure/approval barriers that prevent theoretical capacity becoming actual supply.
- 2) Approval reform and developer contribution reform are critical blockers in many states/territories. Delay, uncertainty and the cumulative cost of regulation can determine whether a project proceeds, particularly for apartments, medium density housing and projects in regional markets.
- 3) The report's focus should extend beyond the planning permit phase and address the full post permit pathway, including referral authority clearances, subdivision certification, utility connections, Statement of Compliance and title registration.

UDIA National supports the four principles for a best practice regulatory system which dovetail into our regulatory reform perspective:

1. **Adopt a build mindset** – we agree regulation must enable housing. We are strongly supportive of the cost benefit of regulations including analysis of housing supply and affordability.
2. **Regulate only where necessary** – Really, the test is; *“does regulation enable feasible housing projects to move from strategic planning to approval, to construction, to occupation?”*

We agree that regulation of design features should be used to overcome market failure and otherwise allow households to choose features they value.

We assume however that where regulations allow (for instance) targeted assessment pathways via (say), design features or pattern books, this will be opened up to greater density (eg mid-rise housing).

3. **Coordinate with Infrastructure** – as we noted, enabling infrastructure becomes a choke point for housing and currently holds up tens of thousands of builds due to mismatched delivery.

We agree with measures to that support housing and clear, efficient rules for contributions.

4. **Keep the process simple** – Complexity from a patchwork of regulations delays and increases costs. We agree regulation design should align with housing goals and focus on simple, predictable and timely decisions.

More specifically, we want to emphasise that the following recommendations by the PC are crucial and have the support of industry to implement:

1. **Allowing 3-storey developments on most residential land** (exceptions only if benefits outweigh costs).
2. **Changing land use controls to allow mid-rise or high-rise in high demand areas.**
3. **Removing minimum lot size requirements that reduce feasibility.**
4. **Allowing residential development in commercial zones** (exceptions to this only where benefits outweigh costs)
5. **Reviewing, reducing, and removing certain land-use controls** – off-street parking requirements, heritage protections, local character restrictions.
6. **Relaxing or removing controls that limit flexibility and choice** – remove max FSRs, restrictions on housing types, minimum dwelling sizes.
7. **Upfront determination of development conditions, infrastructure planning** for housing delivery with performance metrics and KPIs.
8. **Expanding the use of fast-track and state-significant pathways with incentives** to increase speed of assessment.
9. **Public Performance reporting to capture the approval burdens end to end.**
10. **Coordinating infrastructure planning across governments that support housing objectives.**
11. **Improving sequencing of housing and infrastructure plans to support zoning/upzoning** with public accountability frameworks across Govts, regulators and infrastructure service providers.

12. **Ensuring developer contributions to reflect user benefits tied to developments and apportioned** where beneficiaries are outside immediate developments. Includes removal of contributions where there is no benefit nexus and costs to reflect burdens more accurately.
13. **Ensuring developer contribution frameworks allow upfront estimates, staged or delayed payment** with transparent, centralised reporting of funds collected and used.

UDIA National is able to make itself available for any further workshops on the detailed issues we raise here and in the Appendix.

UDIA is keen to discuss these Federal State and Territory issues with you at your earliest convenience.

In the meantime, please do not hesitate to contact me on [Redacted] to discuss this submission.

Yours sincerely

Andrew Mihno

Head of Policy and Government Relations

Urban Development Institute of Australia (National)

APPENDIX A: The Information Requests

UDIA National has provided answers to the most pressing information requests in the Interim Report.

We are able to expand on anything written below in discussion with the PC.

Information request 1.2

- What features should governments have in mind when evaluating reforms to move housing regulatory systems towards best practice?
- Are the best practice principles and overarching objective (figure 1.2) we have identified appropriate? If not, what changes should be made?
- What are some examples of specific housing supply regulations (in Australia or internationally) that:
 - a) exemplify the features of a best practice system for housing regulation
 - b) clearly do not reflect these features

In concert with the points made in our attached letter and original submission, UDIA supports the Commission's proposed overarching objective and the four best practice principles.

One additional feature should be explicit in their application: regulatory performance should be assessed against deliverable and commercially feasible housing capacity, rather than theoretical planning capacity alone.

UDIA supports land supply reporting that distinguishes land identified for future growth, land within settlement boundaries, zoned residential land, serviced or serviceable land, development ready land and lots likely to be delivered within five years.¹

This distinction should also apply when governments assess the success of regulatory reform. This dovetails with our earlier comments in the attached letter, regarding whole of Government metrics and KPI's for performance on housing supply. A reform that increases mapped dwelling capacity but leaves infrastructure, servicing, approvals or feasibility unresolved should not be treated as having delivered an equivalent increase in effective housing supply.

The Commission's principles should be implemented through measurable end to end performance indicators covering strategic planning, approvals, infrastructure readiness, subdivision and delivery.

One final point in relation to the overarching objective and best practice principles. UDIA's long running mantra is that the success of any regulatory reform needs to be supported by:

1. a collaborative and outcome-focussed culture.
 2. governance and procedural frameworks,
- that facilitate cross-Government commitment & accountability.

¹ See for example, UDIA Victoria, *Building Regional Victoria: Regional Election Platform 2026* (May 2026), p. 8.

To this end, we recommend PC's Final Report include a nationwide adoption of an industry/government collaborative approach/mindset to jointly address the ever worsening housing affordability crisis across each Australian state and territory.

Information request 2.1

- Can you provide information, data, or analysis on development cost stacks across different housing typologies and geographic areas (for example, construction cost information)?
- Can you provide information, data, or analysis on the extent to which dense housing typologies differ in commercial feasibility (for example, comparisons between apartment and townhouse developments)?

We refer to our previous submission of 15 June 2026 and note the following additional comments.

UDIA is currently undergoing a process to update nationally consistent cost stacks for indicative projects in growth corridors and within established urban areas. As this work is currently incomplete, UDIA will provide data and insights in the coming months (pre-Christmas).

UDIA supports the Commission's focus on whether land use and design controls affect commercially feasible housing capacity. For example, in some states and territories this question is particularly important for apartment and medium density development, where additional planning capacity does not necessarily translate into feasible housing supply.

UDIA's *Rethinking 70/30* research demonstrates the scale of the apartment feasibility challenge. Modelling of a representative 55 dwelling mid rise apartment project in Greater Melbourne estimated a delivery cost of approximately \$838,000 per dwelling. The project required an average sale price of approximately \$922,000 to achieve a viable return, compared with a Greater Melbourne median unit price of approximately \$617,000. This represents a feasibility gap of more than \$300,000 per dwelling.

The broader modelling found that new mid-rise apartment projects generally require end sale values of approximately \$14,000 to \$16,000 per square metre once land, construction, professional fees, statutory charges, finance, marketing, contingency and an appropriate development margin are included. On the report's conservative feasibility benchmark, prevailing sale prices were insufficient to support feasible apartment development in approximately 97 per cent of Greater Melbourne suburbs.

This does not suggest that planning controls are the sole cause of apartment infeasibility. Rather, it demonstrates the limited capacity of many projects to absorb additional requirements that increase development costs, reduce saleable floor area or constrain dwelling yield. The Commission should therefore consider the cumulative effect of land use and built form controls on commercial feasibility, rather than assessing individual controls in isolation.

The same issue arises for medium density development. A member case study involving a 700 square metre regional infill site found that canopy and deep soil requirements reduced the potential yield from three townhouses to two, rendering the project financially unviable. The issue is not the objective of canopy requirements itself, but the effect of multiple controls on whether an otherwise appropriate housing outcome remains deliverable.

The Commission should recommend that governments assess land use and built form controls against their cumulative impact on development cost, net saleable area, dwelling yield and commercially feasible housing capacity.

Information request 2.2

- Can you provide information, data or analysis on the degree to which available land is a barrier to new housing supply?
- Can you provide examples of released land that has not been able to be developed for housing, and explain the barriers to development in these cases?
- Would it be helpful for governments to report a land measure which distinguishes land that is zoned residential, from land that is serviced, approved, infrastructure-ready and commercially feasible to develop?

Further to our previous submission of 15 June 2026 and comments in the letter above, we provide the following comments.

UDIA strongly supports the Commission examining whether governments should distinguish between aggregate measurement of undeveloped residentially zoned land, and appropriately zoned land that is serviced, approved, infrastructure committed and commercially feasible.

Infrastructure is a very wide spread constraint on new housing supply across Australia's growth corridors.

Recent UDIA analysis shows there is a need for around \$16bn in enabling infrastructure to unlock new housing. UDIA's latest National Housing Pipeline® reporting (March 2026) highlighted that ~40% of forward greenfield land release for housing across our major capital cities & connected regions is held up by a lack of enabling infrastructure.

At a disaggregated state level, the greenfield enabling infrastructure hold ups are even more stark:

1. **Greater Sydney Megaregion** – 34% of surveyed land supply requires commitment/funding for enabling infrastructure
2. **South East Queensland** – 44% of surveyed land supply. requires commitment/funding for enabling infrastructure
3. **Greater Melbourne** – 24% of surveyed land supply requires commitment/funding for enabling infrastructure
4. **Greater Perth** – 30% of surveyed land supply requires commitment/funding for enabling infrastructure
5. **Greater Adelaide** – 31% of surveyed land supply requires commitment/funding for enabling infrastructure
6. **Combined Capital Cities – Average of 33% of surveyed land supply requires commitment/funding for enabling infrastructure.**

With the significant financial constraints on regional communities and Local Governments, we expect the problem is even more acute outside of the major metropolitan regions.

UDIA's latest National Housing Pipeline® reporting also powerfully quantified the extent to which aggregate zoned land for residential development is 'fundamentally constrained' which effectively means 'sterilised' from forward development. The UDIA NHP annual geo-spatial land supply & development constraints analysis highlighted that:

1. **South East Queensland** – contains ~6,120 hectares of fundamentally constrained undeveloped residential zoned land supply – the largest volume of 'sterilised' supply across the capital cities.

2. **Greater Sydney Megaregion** – contains a combined ~11,300 hectares of zoned undeveloped land supply that either ‘fundamentally’ or ‘additionally’ constrained (which denotes development constraints which will likely slow and reduce dwelling yields) – which represents the largest volume of constrained supply across the capitals.
3. **Greater Melbourne** – contains ~3,290 hectares of fundamentally constrained supply, and further ~2,500 hectares of ‘additionally’ constrained land.
4. **Greater Perth** – contains ~1,460 hectares of fundamentally constrained supply, and further ~3,045 hectares of ‘additionally’ constrained land.
5. **Greater Adelaide** – contains ~606 hectares of fundamentally constrained supply, and further ~2,320 hectares of ‘additionally’ constrained land

Government land supply reporting should therefore distinguish between successive stages of readiness rather than presenting zoned or strategically identified capacity as immediately available housing supply.

Information request 2.3

- What evidence do you have on which land-use controls or combinations of controls are the greatest constraint on housing supply in your jurisdiction?
- What reforms to land-use controls are likely to boost housing supply in each jurisdiction? What are the expected impacts of reforms on zoned capacity, commercially feasible capacity and/or other measures of supply? What are the expected impacts on positive and negative externalities? We are particularly interested in quantitative evidence on reforms to minimum lot size and reducing coverage of broad heritage controls.
- How should potential reforms be implemented? What does the evidence show about the effectiveness of past zoning and land-use reforms in Australia?
- What evidence do you have on the effects of mandatory and voluntary inclusionary zoning requirements for affordable housing on housing supply and affordability?

We refer to our previous submission of 15 June 2026 and note the following additional comments.

UDIA supports the Commission’s proposed land use reform directions, including greater housing capacity in appropriate locations and reducing controls that unnecessarily restrict housing diversity or commercially feasible development.

The critical implementation issue is that zoning should be assessed by the commercially feasible capacity it creates, rather than nominal additional dwelling capacity.

Land use reform should therefore be accompanied by consideration of infrastructure readiness, built form requirements and approval pathways. Where government has made a strategic decision that an area should

accommodate additional housing, subsequent controls should facilitate that outcome rather than recreate the constraint through overlapping or discretionary requirements.²

The Victorian evidence outlined above supports the Commission incorporating commercial feasibility and infrastructure readiness into its assessment of land use reform outcomes.

Information request 3.1

- What evidence do you have for the main causes of delays in receiving approvals for new housing?
- When is discretion useful in planning processes, and when is it not useful? Are there examples of subjective requirements that should be changed or removed to improve certainty for developers?
- How should third-party appeal processes be changed to better balance the benefits they provide to community members and the uncertainty and delay costs they impose on developers?

We refer to our previous submission of 15 June 2026 and note the following additional comments.

UDIA supports limiting discretion where strategic planning has already resolved the appropriate form and intensity of housing development.

By way of example, Victoria's recent Clause 55 reforms provide a useful example of this direction. The deemed to comply framework allows qualifying townhouse and low-rise apartment applications to be assessed against objective standards, reduces reliance on subjective neighbourhood character assessment and removes third party appeal rights for compliant proposals. UDIA supports this approach because it provides greater certainty about the requirements that must be satisfied. It is, however, too early to establish whether the reforms have translated into increased housing commencements.

There is also a case for proportionate reform of third-party appeals. In consultation on Victoria's Planning and Environment Act review, DTP estimated that limiting appeal rights to directly notified objectors could reduce third party appeals by 15 to 25 per cent and generate up to \$31 million in annual economic benefits. UDIA supports that proposal as a balanced reform. These estimates are DTP's rather than UDIA's modelling.

The Commission should support approval systems that retain appropriate review rights while reducing opportunities for appeals unrelated to a directly affected interest. This provides greater certainty for development that complies with established policy.

Information request 3.2

- Which specific requirements (for example specific reports or referrals to an agency) are most onerous to comply with when receiving a development approval?

² UDIA Victoria, *Building Regional Victoria: Regional Election Platform 2026* (May 2026); UDIA Victoria, *Rethinking 70/30* (2026); and UDIA Victoria, *Submission to the Legislative Council Select Committee Inquiry into Victorian Planning Provisions Amendments VC257, VC267 and VC274* (24 April 2025).

- Are there any requirements for development approval that should be removed? In these cases, how should any risks be mitigated?

- What could each state and territory do, if anything, to improve the process for receiving subdivision approvals?

Referral processes and repeated requests for further information remain significant opportunities for reform in many states.

Responsible authorities should be required to identify incomplete responses to a request for information (RFI) promptly, while preventing subsequent RFIs from repeatedly pausing or resetting statutory assessment clocks. Referrals should also be issued promptly, with referral authorities deemed not to object where they fail to respond within prescribed timeframes.

Cultural Heritage Management Plan processes are another area where better coordination is required. UDIA members identify post PSP CHMP processes as a material impediment to timely housing delivery and recommends stronger state coordination, standardised Registered Aboriginal Party protocols, earlier archaeological work during strategic planning, statutory timeframes and clearer mechanisms for resolving delay. This position reflects member experience and should not be interpreted as suggesting that all CHMP processes cause delay.

Subdivision should also be considered part of the approval reform agenda. Practical examples show relatively minor administrative matters delaying subdivision registration after substantive planning decisions had already been made, including sequential requisitions on related subdivision plans and administrative processes that prevented a minor levy issue being corrected efficiently.

The Commission should assess approval performance across the full pathway to subdivision and title, rather than measuring development permit determination in isolation.

Information request 3.3

- Is improving the coordination of the approvals process a higher or lower priority than reforms to reduce the amount of approval requirements?

- Are there any examples of where coordination bodies are or are not working? What are the features of coordination bodies which make them successful?

- How effectively are reforms to planning rules, such as SA's Planning and Design Code and Victoria's Clause 55, working to make approvals more certain?

Improved coordination and fewer unnecessary approval requirements are complementary reforms rather than alternatives.

Coordination bodies are most useful where multiple agencies have legitimate roles but require a mechanism to sequence advice, reconcile competing requirements and escalate unresolved matters. They should not become an additional layer through which the same approvals must pass.

Clause 55 demonstrates the value of addressing the underlying regulatory requirements themselves. Moving qualifying proposals towards objective, deemed to comply standards can remove the need for coordination around subjective matters because the applicable requirements are settled upfront.

Information request 3.4

- What examples are there of best-practice strategic planning improving the process for housing approval decisions at a state, territory or local government level?
- Do the features of tiered assessments we have identified match best-practice? What sort of developments should be included in each tier?
- How effective has technology including AI been where it has been used to assist with approvals? How can it be better utilised?
- What are the best ways to enhance how states and territories track the timing and burden of approvals?
- What reforms should each state and territory prioritise to reduce the burden of the approvals process?
- How can federal, state and territory governments incentivise councils to approve developments efficiently, and encourage those that are slow or are obstructing approval pathways?
- What evidence is there about the benefits of including social and affordable housing in state-significant, or other streamlined, pathways?

We refer to our previous submission of 15 June 2026 and provide the following additional comments.

UDIA supports risk based and proportionate approval pathways, clearer statutory timeframes and transparent reporting of performance across responsible authorities and referral agencies.

Technology can assist with these reforms, but should not be treated as a substitute for simpler regulation. UDIA does not presently have sufficient evidence to conclude that AI assisted assessment has materially improved housing approval outcomes.

Rules based administrative processes, including document checking, referral tracking, condition matching and elements of Statement of Compliance processing, offer more immediate opportunities for digitisation while retaining human review for exceptions.

Information request 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?

We refer to our previous submission of 15 June 2026 and provide the following additional comments.

UDIA strongly supports Reform Directions 4.1 and 4.2. See 4.2 below for further comments.

Information request 4.2

- What feedback do you have on our reform directions for infrastructure planning? To what extent will these resolve the planning coordination issues and address constraints to housing supply?

– How should reforms to infrastructure planning be implemented and what are the main challenges?

We refer to our previous submission of 15 June 2026 and provide the following additional comments.

Our previous submission detailed extensively the needs and pathways around coordinating infrastructure for housing and publicly accessible housing performance datasets. The critical nexus to coordination and datasets is the monitoring and management regime. This has to be hardwired into the infrastructure planning framework, rather than an assumed aspect.

UDIA strongly supports Reform Directions 4.1 and 4.2.

The central issue is sequencing. Land should not be rezoned or counted as development ready without a credible pathway for the infrastructure required to support the intended housing outcome.

This requires infrastructure plans to identify the infrastructure required, delivery responsibility, timing, funding source and dependencies with utilities and other agencies.

Infrastructure service providers should also be incorporated into housing delivery accountability frameworks. Service standards, escalation processes and transparent reporting should apply where utility approvals or connections are critical to planned housing supply.

Information request 4.3

– How can governments balance the need to support feasibility for developers by collecting developer contributions later in the development process, with a need for upfront funding to kickstart infrastructure to support new housing?

We refer to our previous submission of 15 June 2026 which provided extensive detail on the feasibility impact of poorly structured contributions frameworks. It also provided recommendations on how to support feasibility, which we note the Commission has taken up. We provide the following additional comments.

UDIA acknowledges the Commission's recognition of the tension between later contribution payments, which can improve project feasibility, and governments' need to fund enabling infrastructure before development proceeds.

This is fundamentally a financing and sequencing issue. It should not be resolved simply by requiring contributions to be paid earlier.

State and Australian Government bridging finance, including appropriately structured low or no interest financing, can allow priority infrastructure to be delivered when required, with developer contributions recovered later as development proceeds.

Payment timing should be calibrated to avoid unnecessarily increasing holding and finance costs while maintaining a credible funding pathway for infrastructure.

As noted in our previous submission, later development contributions can be easily aligned with delivery milestones and the Federal Government also has an opportunity to enable this through upfront funding for infrastructure that is paid off by incoming contributions at a later date. The money is not at risk because it will be recouped and the front ending of infrastructure unlocks more housing in the process.

Information request 4.4

- Are our directions for improving developer contribution frameworks addressing key infrastructure challenges that will support housing supply? What evidence or case studies support this?
- How should reforms be designed to overcome the implementation challenges including determining nexus, fair apportionment, accurate upfront cost estimates for infrastructure, timing and funding sequencing, and first mover disadvantages?

UDIA strongly supports the Commission's proposed emphasis on nexus, apportionment and upfront cost certainty.

We refer to our previous submission of 15 June 2026 which provided extensive detail on contribution frameworks in line with your reform direction and we provide the following additional examples by way of comment.

Creamery Road provides a clear Victorian example. UDIA's correspondence cites DTP modelling indicating that development within the precinct would contribute only 6 to 11 per cent of future Midland Highway traffic. Despite this, the proposed contribution approach required 100 per cent of land costs associated with widening state arterial roads and 50 per cent of land and construction costs for the Midland Highway and Geelong Ballan Road intersection to be incorporated into the DCP.

The issue is not whether development should contribute to infrastructure it requires. It is whether the contribution bears a demonstrable and proportionate relationship to the demand generated by that development.

Ballarat West illustrates the risks where contribution frameworks do not adequately anticipate infrastructure costs. The original DCP proved insufficient, with subsequent charges increasing from \$201,470 to \$422,774 per net developable hectare and from \$1,150 to \$1,450 per dwelling.

These examples support the Commission's proposed reforms requiring clear nexus, fair apportionment, reliable upfront estimates and transparent reporting. Where infrastructure serves broader regional or state beneficiaries, the corresponding share of the cost should be funded from broader sources rather than assigned to a single development precinct.

Information request 4.5

- Are our proposed roles for the Australian Government in supporting housing-enabling infrastructure useful and appropriate to support new housing? What other roles should we consider?

We refer to our previous submission of 15 June 2026 which provided detail that supports the position taken by the Commission. We make the following further comments.

The Australian Government has an important role where infrastructure sequencing creates funding gaps that state, local or utility contribution mechanisms cannot efficiently bridge.

Commonwealth assistance should prioritise infrastructure that can demonstrate a clear housing enabling effect and should support states to bring infrastructure forward where contributions will otherwise accrue too slowly to meet the required delivery timetable.

Funding should be accompanied by transparent information on the housing enabled, infrastructure delivery milestones, responsible agencies and other committed funding sources. This would complement rather than replace state responsibility for land use planning and infrastructure delivery.

Information request 5.1

- Which of the reform directions will be relatively easy or hard to implement and why? Are there any examples of 'quick wins' that could be achieved?
- Are there any co-dependencies or sequencing considerations across the reform directions?
- How can the Australian Government ensure housing regulatory system reform is implemented in a manner that supports all governments' commitments under the National Agreement on Closing the Gap?
- How can the Australian Government best support state and territory and local governments to shift housing regulatory systems towards best practice?

We refer to our previous submission of 15 June 2026 which provided detail on quick wins that are relatively straightforward to implement. Please see the submission for all examples however, including:

- provide infrastructure plans/strategies and funding requirements as a pre-requisite to Federal Funding,
- publish of existing datasets ahead of coordinated monitoring and management.
- Adopt metrics and KPIs across supply, enabling infrastructure and affordability for key Government bureaucracies ahead of wider implementation.
- Re-calibrate upfront incentives under existing Federal Funding for states and territories on key housing supply & affordability metrics.
- Implement:
 - enforceable referral timeframes and deemed no objection mechanisms.
 - limits on repeated use of RFIs to stop statutory assessment clocks;
 - clearer objective and deemed to comply assessment pathways;
 - public reporting of approval, referral and infrastructure service performance; and
 - staged reporting of land supply that distinguishes zoned capacity from development ready supply.

We make the following additional comments.

More substantial reform will be required to address infrastructure sequencing and developer contribution frameworks. These reforms depend on governments agreeing infrastructure responsibilities, funding sources, cost apportionment and mechanisms to finance infrastructure ahead of contribution collection.

The reform directions are also interdependent. Planning reform will have limited effect where infrastructure cannot support the additional capacity or projects remain commercially unviable. Faster approvals will not produce completed homes where post permit or utility processes remain unresolved. Later developer contribution payments will improve project cash flow only if governments have alternative mechanisms to bring forward the infrastructure those contributions ultimately fund.

For this reason, implementation should be measured against housing progressing through the full delivery pipeline, rather than individual regulatory reforms being introduced or nominal dwelling capacity being added to planning schemes.