

SUPPLEMENTARY SUBMISSION TO THE PRODUCTIVITY COMMISSION
Housing Supply Regulation — Response to the Interim Report (July 2026)

Submitted by

Australian Eco-living Organisations Network (AEON)

Australia's peak body for cooperative and regenerative living

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This submission supplements AEON's initial submission of June 2026 (sub. 35) and should be read alongside it.

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1 Introduction

AEON welcomes the opportunity to respond to the Productivity Commission's Interim Report on Housing Supply Regulation (July 2026), and thanks the Commission for its continuing engagement with this inquiry.

AEON's initial submission (sub. 35, June 2026) set out the case for recognising cooperative and regenerative settlements — ecovillages, cohousing, land-sharing and community land trusts — as a distinct housing typology, with eleven recommendations spanning planning, infrastructure, tenure, finance, regularisation, a demonstration program, a First Nations taskforce and federal legislation.

The interim report cites this evidence once, noting that “despite their increasing demand, land-lease models are treated inconsistently or not addressed in regulation” (AEON, sub. 35; ATHA, sub. 51; CIAA, sub. 44) (interim report, pp. 43–44). That citation illustrates a problem this submission goes on to describe: the interim report's only reference to AEON's evidence places it within a discussion of land-lease housing as a retirement product — a different housing model from the cooperative ecovillages, cohousing and Multiple Occupancy communities that make up AEON's sector. The absence of a distinct planning category for this sector has apparently extended to the absence of a distinct category in the Commission's own evidence base. We welcome that reference, but the report's reform directions — focused on storey limits, apartment zoning, minimum lot sizes, approvals and developer contributions — do not yet engage with the typology gap, infrastructure self-sufficiency, or tenure and finance barriers that were the central subject of our initial submission.

This submission responds directly to the interim report's own framework — its best-practice principles, chapter structure and information requests — showing how AEON's June proposals sit within the Commission's own evaluative criteria, and providing the specific evidence requested in the areas most relevant to our sector.

This submission does not repeat the case studies, legal analysis or constitutional argument set out in sub. 35 in full. It should be read as a companion document, with page and section references to sub. 35 provided throughout.

2 Executive Summary

AEON's core argument is unchanged since June: the absence of a defined land-use typology for cooperative and regenerative settlements is the binding constraint on this sector's contribution to housing supply. Everything else — tenure fragility, finance exclusion, infrastructure barriers, council capacity — flows from that single missing element.

This submission shows that the reforms AEON proposed are not a special-interest request sitting outside the Commission's framework, but a direct application of it:

- **Best-practice principles:** the report's four principles provide a ready-made test that cooperative and regenerative typologies pass, and that the current absence of any typology fails (section 3).
- **Land-use regulation:** chapter 2's reform agenda can be extended, at negligible cost, to include nationally consistent Regenerative Village and Cohousing definitions

using the Bellingen template and lessons from the many multiple occupancy, ecovillage and intentional community initiatives (section 4).

- **Approvals:** chapter 3's interest in early strategic planning and tiered assessment is already demonstrated by the Bellingen locality-planning methodology, a ready-made national template (section 5).
- **Infrastructure:** chapter 4's coordination and contributions reforms are silent on community-owned infrastructure; this submission identifies the specific regulatory gaps that block it (section 6).
- **First Nations housing:** information request 1.1 sits within chapter 1 and connects directly to AEON's recommendation for a First Nations Cooperative Housing Taskforce (section 3).
- **Quick wins:** typology recognition is a genuine 'quick win': the template already exists, requires no new institution to begin, and unlocks land outside the conventional supply pipeline — additive to, not competing with, the report's other reform directions (section 7).

The table below restates AEON's eleven recommendations from sub. 35 in summary form, mapped against the interim report's chapters and information requests, and against the priority sequence discussed in section 7. Full recommendation text is in sub. 35, section 3.

#	AEON recommendation (sub. 35)	Interim report chapter / reform direction	Relevant information request(s)	Priority
1	Recognise cooperative/regenerative housing as a defined typology	Ch. 2 (land-use regulation)	IR 2.1, 2.3	Quick win
2	National consistent standards & approval pathways (eg. Bellingen template; expansion of NSW State Environmental Planning Policy Schedule 5 Rural Land sharing Communities)	Ch. 2 (RD 2.1–2.6); Ch. 3 (RD 3.1–3.4)	IR 2.1, 3.1, 3.4	Quick win
3	Reform community energy/water regulation	Ch. 4 (RD 4.1, 4.2)	IR 4.1, 4.5	Medium-term
4	Recognise infrastructure self-sufficiency as expanding land availability	Ch. 2 (land release); Ch. 4	IR 2.2	Quick win / Medium-term
5	Reform tenure & finance frameworks for collective ownership	Cross-cutting (not addressed in current reform directions)	—	Medium-term
6	Recognise and regularise existing communities	Ch. 1 (best practice — existing stock)	—	Medium-term
7	National Regenerative Settlement Demonstration Program	Ch. 5 (quick wins & sequencing)	IR 5.1	Medium-term
8	Establish First Nations Cooperative Housing Taskforce	Ch. 1	IR 1.1	Medium-term
9	Federal leadership on enabling legislation & sector engagement	Cross-cutting (constitutional)	—	Long-term

#	AEON recommendation (sub. 35)	Interim report chapter / reform direction	Relevant information request(s)	Priority
10	Support modern methods of construction for regional cooperative housing	Ch. 3 (RD 3.4 — innovation, technology)	IR 3.4	Medium-term
11	Fund AEON to build sector capacity, knowledge and engagement	Cross-cutting (enabling)	—	Quick win

3 Response to Chapter 1 — Best-Practice Principles for Housing Regulation

The interim report proposes an overarching objective for housing regulatory systems — to enable enough housing to meet people’s needs, where it delivers the greatest net benefit to the Australian community — underpinned by four best-practice principles: adopt a ‘build’ mindset; only regulate where necessary; coordinate with infrastructure; and keep the process simple (interim report, figure 1.2, p. 24). AEON considers these principles well-designed and offers the following observations on how they apply to cooperative and regenerative settlements.

3.1 A build mindset currently has nothing to test

The build mindset principle asks governments to “only restrict location and form where the benefits clearly outweigh the costs.” For cooperative and regenerative settlements, this test cannot be applied at all in most of Australia — not because it has been applied and failed, but because no land-use definition exists to test. This default-to-prohibition outcome is arguably a more fundamental failure of the principle than any single restrictive control examined elsewhere in the report.

3.2 Only regulate where necessary: mismatched regulatory categories impose unnecessary costs

Where cooperative and Multiple Occupancy developments are assessed against subdivision or Community Title standards designed for individually titled lots — as documented in the Afterlee Ecovillage case study in sub. 35 (section 7.1, p. 17) — conditions are imposed that do not reflect what is actually being approved. This is regulation of a mismatched category, not proportionate regulation of an identified risk, and it sits squarely within the harms the second principle is designed to avoid.

3.3 Coordinate with infrastructure: a model that already does this is being penalised, not rewarded

The third principle asks governments to plan housing and infrastructure together. The regenerative village model achieves this by design: energy, water and waste infrastructure is delivered as an integral part of development, not a precondition financed through external contributions (sub. 35, section 7.3). A model that internalises this coordination problem should score well against the principle — yet because current energy and water frameworks

have no category for community-owned infrastructure, that advantage cannot be realised in practice, as the Afterlee microgrid case demonstrates (sub. 35, section 5, p. 20).

3.4 Keep the process simple: fragmented, geographically-limited frameworks fail this test directly

The fourth principle favours clear decision pathways over the discretion that fragmented rules create. The closest existing approximation to a pathway for this sector — NSW's Schedule 5 (Rural Landsharing) — applies only in a shrinking list of named council areas and has no equivalent in most other states (sub. 35, section 7.1.2). By contrast, the Bellingen planning framework — a complete, council-endorsed set of definitions, locality criteria and development controls — demonstrates what a simple, predictable pathway looks like (sub. 35, section 7.1.4).

The Multiple Occupancy model provides a second, and longer-tested, example of what a simple, predictable pathway looks like in practice. Enabled in NSW since the mid-1970s through the predecessor to Schedule 5, it has a fifty-year record of delivering affordable, community-governed rural housing, with between 150 and 200 approvals still operating across the Northern Rivers alone (sub. 35, section 5). The Byron Shire Development Control Plan shows this model already reduced to a detailed, replicable set of development controls at council level (sub. 35, section 7.1.3). Unlike what is proposed for Bellingen, Multiple Occupancy has never been elevated to a defined term in the NSW Standard Instrument planning dictionary, so it remains geographically confined and cannot be fast-tracked as a template beyond the councils that happen to list it. A nationally consistent framework for this typology could draw on both models together: Multiple Occupancy for its long track record and proof of durability, and Bellingen for the complete, modern five-element framework that Multiple Occupancy itself still lacks.

3.5 Aboriginal and Torres Strait Islander housing

The interim report's discussion of best-practice principles also seeks input on how housing regulatory systems affect Aboriginal and Torres Strait Islander people's access to appropriate housing, and how governments can improve those systems in alignment with outcome 9 of the National Agreement on Closing the Gap (interim report, information request 1.1). AEON's initial submission argued that community-controlled Indigenous housing is not a special category requiring separate treatment from the cooperative models this submission addresses — it is the most developed and longest-tested form of the collectively governed housing model AEON advocates for across the broader sector (sub. 35, section 6).

AEON does not purport to speak on behalf of First Nations communities, whose housing needs, aspirations and governance structures are properly for them to define. Consistent with that position, AEON recommends the Commission support the establishment of a First Nations Cooperative Housing Taskforce, co-designed and co-led by Aboriginal and Torres Strait Islander housing organisations, operating under self-determination principles with government agencies in a supporting role (sub. 35, recommendation 8). Such a taskforce would be well placed to address the intersection of native title, freehold and cooperative tenure frameworks; barriers to community-controlled infrastructure management in remote and regional settings; and the relationship between cooperative settlement models and Closing the Gap outcomes — directly responding to the second question posed in information request 1.1.

Responding to Information request 1.1

• *How can governments improve housing regulatory systems to better meet the housing needs of Aboriginal and Torres Strait Islander people and communities, in alignment with outcome 9 of the National Agreement on Closing the Gap?*

AEON response:

AEON recommends the Commission support a First Nations Cooperative Housing Taskforce, co-designed and co-led by Aboriginal and Torres Strait Islander housing organisations under self-determination principles, with at least one demonstration-program pilot developed in genuine partnership with a First Nations community (sub. 35, recommendations 7–8).

Responding to 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 we have identified appropriate? If not, what changes should be made?*
- *What are some examples of specific housing supply regulations that exemplify, or clearly do not reflect, the features of a best-practice system?*

AEON response:

The four principles are well-designed but assume a typology already exists to be regulated. AEON recommends the final report make explicit that a complete absence of definition is itself a best-practice failure — distinct from, and in this sector's case, a greater obstacle to development, than over-regulation of an existing category.

Exemplifies best practice: the Bellingen Shire Council Regenerative Village planning framework (2022) — a complete, publicly available model (sub. 35, section 7.1.4; polisplan.com.au/status).

Legacy provisions that need refining: Despite applying only to a narrow list of named Councils, and having no clear dictionary definition, NSW SEPP Primary Production, Schedule 5 — Rural Landsharing communities reflects significant demand for co-operative and regenerative living (sub. 35, section 7.1.2).

4 Response to Chapter 2 — Unlocking More Homes Through Better Land-Use Regulation

The interim report's priority reform directions for land-use regulation (2.1–2.6) address storey limits, apartment zoning in high-demand areas, minimum lot sizes, commercial zone permissibility, and built-form controls. AEON's recommendation for typology recognition does not compete with any of these reform directions — it is complementary to them, and could be adopted alongside them without requiring any of them to be revisited.

4.1 A missing typology is a land-use control gap the current reform directions do not address

None of reform directions 2.1–2.6 contemplate a distinct definition for cooperative and regenerative settlement typologies. AEON recommends the Commission add a further reform direction to this chapter: that state and territory governments adopt nationally consistent Standard Instrument definitions for Regenerative Village (greenfield and rural-fringe settings) and Cohousing Development (urban infill and brownfield settings), following the model developed for and endorsed by Bellingen Shire Council in 2022 (sub. 35, recommendations 1 and 2, section 7.1.4–7.1.5).

4.2 Self-sufficient infrastructure should be reflected in any new land-availability measure

Information request 2.2 asks whether governments should report a land measure distinguishing zoned land from land that is serviced, approved and commercially feasible. AEON supports this, but cautions that a measure defined solely by proximity to service networks would exclude self-sufficient regenerative settlement sites — even though they are commercially feasible and require no network extension. As set out in sub. 35 (recommendation 4, section 7.2), land should be recognised as ‘available for housing’ where a development incorporates its own compliant infrastructure, regardless of proximity to existing connections. This is not an argument for unassessed development: the Bellingen locality-planning methodology (water availability, flood risk, biodiversity, agricultural productivity) should inform how any such category is defined.

4.3 The nature of the constraint on this sector is absence, not stringency

Information request 2.3 asks which land-use controls are the greatest constraint on supply in each jurisdiction. For cooperative and regenerative settlements, the relevant constraint is not that an existing control is too strict, but that no permitted-use pathway exists at all across most of the country. Where a pathway does exist — Schedule 5 in NSW — it is confined to a narrowing list of council areas and has no equivalent in any other state or territory (sub. 35, section 7.1.2–7.1.3). AEON’s case studies (Witchcliffe WA, Aldinga Arts and Christie Walk SA, Currumbin Qld, The Cape Vic, and the Northern Rivers NSW communities — sub. 35, section 5) demonstrate that this is a consistent, national gap rather than a jurisdiction-specific drafting issue.

Responding to Information request 2.1

• What land-use controls need to change to enable more alternative dwelling types to be built? What impact would such reforms have on housing supply?

AEON response:

The primary reform needed is definitional, not the relaxation of an existing control. Nationally consistent Regenerative Village and Cohousing definitions, following the Bellingen model, would create an approval pathway where none exists — the primary barrier to this sector (over 1,330 communities nationally; sub. 35, section 4) expanding its contribution to supply.

Responding to Information request 2.2

• *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?*

AEON response:

Yes, in principle — but any such measure should include a distinct category for land made feasible by self-delivered infrastructure, so self-sufficient sites are not definitionally excluded from housing-supply reporting (sub. 35, recommendation 4).

Responding to 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?*

AEON response:

The binding constraint is the absence of any defined typology or approval pathway in every jurisdiction except a narrowing subset of NSW council areas under Schedule 5. The reform most likely to boost supply is nationally consistent typology definitions, sequenced ahead of infrastructure and tenure reforms (sub. 35, executive summary).

5 Response to Chapter 3 — Reducing the Burden of Approvals

Reform direction 3.1 asks governments to determine infrastructure requirements and trade-offs early through strategic planning, including completing technical studies across localities with high expected demand and incorporating outcomes into planning schemes as codified requirements. Reform direction 3.4 looks to best-practice strategic planning, tiered assessment, and technology-assisted approvals. Both are already demonstrated in practice for this sector.

5.1 The Bellingen locality-planning methodology is a working example of reform direction 3.1

The Bellingen framework's locality-planning methodology identifies suitable sites for regenerative village development based on water availability, flood risk, biodiversity and agricultural productivity, resulting in a map of preferred precincts completed upfront rather than assessed case by case (sub. 35, section 7.1.4). This is precisely the model reform direction 3.1 proposes for housing approvals generally. AEON recommends the Commission's final report reference this as a working precedent, and recommend its extension to other local government areas as part of a nationally consistent strategic planning approach for this typology.

5.2 The Byron Shire Development Control Plan demonstrates tiered, codified assessment

The Byron Shire Development Control Plan provides a second working example directly relevant to reform direction 3.4. Fifty years of iterative council practice have produced detailed, workable development controls for Multiple Occupancy development — addressing dwelling siting and setbacks, ecological restoration requirements, and riparian protection —

without the benefit of a defined land use term to build from (sub. 35, section 7.1.3). Where the Belling framework shows what a complete strategic planning approach looks like when built from scratch, the Byron DCP shows what detailed, tiered development controls can achieve even within a fragmented and geographically confined policy setting. AEON encourages the Commission to review both as complementary evidence for its final report.

5.3 Approval delay in this sector stems from absence of a pathway, not a slow pathway

Where no defined typology exists, applications default into categories — typically subdivision — that do not reflect what is actually proposed. The Afterlee Ecovillage case study records that the consent authority did not understand the difference between Multiple Occupancy and community or freehold title, and imposed conditions that assumed subdivision when none was proposed, without any fast-track or collaborative pathway available (sub. 35, section 5, pp. 19–20). This is a distinct failure mode from the approval-process delays examined elsewhere in chapter 3, and a defined typology with codified assessment criteria would resolve it directly.

Responding to Information request 3.1

- *What evidence do you have for the main causes of delays in receiving approvals for new housing?*

AEON response:

For this sector, delay is caused by the absence of an applicable assessment category, forcing applications into ill-fitting conventional pathways (typically subdivision) and generating disputes that a defined typology would avoid (sub. 35, Afterlee case study, section 5).

Responding to 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?*

AEON response:

The Belling framework (2022) is a working example of best-practice strategic planning: locality criteria assessed upfront and codified into instrument provisions (sub. 35, section 7.1.4). AEON recommends it as a national template, with a fast-track tier for compliant proposals — consistent with reform direction 3.2’s pattern-book concept and the modern-construction stream proposed in sub. 35 (recommendation 10).

6 Response to Chapter 4 — Delivering Housing-Enabling Infrastructure

Chapter 4 examines infrastructure planning and coordination, who should pay for housing-enabling infrastructure, and developer contribution frameworks. Each of these areas has a distinct dimension for cooperative and regenerative settlements that is not currently addressed by the interim report’s reform directions.

6.1 Infrastructure planning and coordination should recognise self-delivered community infrastructure

Reform directions 4.1 and 4.2 ask governments to document how infrastructure planning supports housing objectives and to improve sequencing between infrastructure and housing development. Regenerative village and cohousing developments remove much of this coordination burden by design: energy, water and waste infrastructure is delivered as an integral part of the development rather than a precondition sequenced through separate planning processes (sub. 35, section 7.3). AEON recommends the accountability framework proposed under reform direction 4.2 explicitly recognise self-delivered, community-owned infrastructure as a distinct and legitimate pathway, alongside government and regulated utility provision.

6.2 Community-scale energy and water regulation has no category for cooperative ownership

The barrier is regulatory, not technical. The National Electricity Law and state water licensing frameworks are designed around individual dwellings or large-scale utility providers, with no tailored category for community-owned infrastructure. Narara Ecovillage's community smart grid required bespoke arrangements and could only obtain a licence to supply water sourced from the council network, despite seeking to operate its own (sub. 35, section 5, p. 15). Afterlee's proposed cooperative microgrid — serving 29 dwellings — could not proceed at all, as no framework or rebate structure exists for cooperatively owned systems (sub. 35, section 5, pp. 20–21). Currumbin's decentralised water and wastewater system relies on bespoke approval conditions rather than a generally available pathway (sub. 35, section 5, p. 24).

AEON reiterates recommendation 3 from sub. 35: a formal definition of 'community microgrid' in the National Electricity Law; streamlined licensing pathways for embedded network operators in cooperative developments, scaled to system size; recognition of community-managed water systems as a legitimate basis for development approval where public health standards are met; and eligibility of community cooperative infrastructure for ARENA and Clean Energy Finance Corporation funding.

6.3 Developer contribution frameworks need an explicit treatment for self-sufficient infrastructure

Reform directions 4.3 and 4.4 seek cost-reflective developer contributions with a clear nexus to the infrastructure a development actually requires. Where a development delivers and owns its own energy, water and waste infrastructure, there is little or no nexus to the off-site network infrastructure that conventional contributions typically fund. Without an explicit exemption or adjustment mechanism, self-sufficient developments risk being charged contributions toward infrastructure they do not use, while also bearing the full cost of the infrastructure they do use — a double burden that would undermine the affordability outcomes this housing model is otherwise well placed to deliver.

Responding to 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?*

AEON response:

The core misalignment is definitional, not operational: energy and water frameworks are built around individual dwellings and utility-scale providers, with no tailored category for community ownership to coordinate around. AEON recommends the reforms set out in sub. 35, recommendation 3.

Responding to 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?*

AEON response:

AEON supports reform directions 4.1 and 4.2 but notes they are silent on self-delivered infrastructure. Explicitly including community/cooperative providers within the proposed accountability framework would close this gap at negligible cost — recognising an existing model rather than funding a new one.

Responding to 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?*

AEON response:

AEON recommends the Government's role also include: ARENA/Clean Energy Finance Corporation eligibility for community-scale infrastructure; AER and state water authority guidance on compliant community structures; and a co-investment role for the demonstration program proposed in sub. 35 (recommendation 7) — consistent with the Local Infrastructure Fund's objective of housing-ready land without network extension.

7 Response to Chapter 5 — Toward More Homes, Faster

The interim report concludes that land-use reform is likely to have the greatest overall effect on housing supply, while reforms to approvals and developer contributions alone are likely to have less effect, and that governments should not rely on these types of reforms alone to address the supply challenge (interim report, p. 12). AEON agrees with this general framing and submits that typology recognition for cooperative and regenerative settlements is a distinctive and genuine 'quick win' within it.

Three features distinguish this reform. First, the template already exists and has been through a public planning process: developed with NSW Government funding and unanimously endorsed by Bellingen Shire Council in 2022. Second, it requires no new institution, funding program or legislative change to begin. Third, because it unlocks supply outside the conventional pipeline (self-sufficient sites not reliant on network capacity), its effect is additive to the report's other reform directions rather than competing with them for the same zoned capacity.

AEON notes that this sector in fact offers two distinct starting points, not one. The Belling framework is already drafted, publicly available and council-endorsed, and requires policy adoption rather than new technical work. The Multiple Occupancy model requires the opposite kind of quick win: it is already operating, at scale, and needs formal recognition — a defined term in the planning dictionary and a regularisation pathway for existing communities (sub. 35, recommendation 6) — rather than new development or piloting. Between them, the two models mean the Commission is not being asked to design a new typology from first principles, only to adopt what already exists in one place and formalise what already exists in another.

AEON's original submission itself proposed a sequencing logic for the reforms it recommended: definitions and planning pathways unlock approval certainty; infrastructure reform enables self-sufficient settlement; tenure and finance guidance unlocks access to capital; regularisation protects existing communities; a demonstration program generates the evidence base for scaling; and enabling federal legislation provides durable national consistency (sub. 35, executive summary, p. 3). AEON recommends the Commission's final report adopt a comparable phased approach for this sector, set out in the recommendations table in the Executive Summary above.

Responding to 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?

AEON response:

Adoption of nationally consistent Regenerative Village and Cohousing definitions, using the Belling template, is a quick win: low-cost and immediately available for state and territory adoption. It should be sequenced ahead of infrastructure, tenure and finance reforms, which depend on typology recognition to have full effect (sub. 35, executive summary).

8 Recommended Additions to the Final Report

AEON requests that the Commission's final report (due March 2027):

- Explicitly bring cooperative and regenerative settlement typologies within the scope of the inquiry's land-use control analysis, alongside the upzoning and built-form reforms already proposed;
- Include both the Belling framework and the Multiple Occupancy model (as codified in Schedule 5 and the Byron Shire Development Control Plan) in its review of approval-pathway and pattern-book models under reform direction 3.2, as complementary rather than competing templates;
- Consider the land-supply implications of infrastructure self-sufficiency as a distinct category within its infrastructure-coordination analysis (chapter 4), separate from the sequencing of conventional network extension;
- Refer the tenure and finance barriers facing cooperative housing (Community Title, Multiple Occupancy, share-based equity) to Treasury and the National Housing Finance and Investment Corporation for parallel consideration, given these matters are formally out of scope for this inquiry; and

- Engage AEON directly as part of the further consultation process flagged in the interim report, including the planned survey of housing developers and further roundtables.

9 Conclusion

The interim report's best-practice framework, its interest in diverse dwelling types, its search for quick wins, and its request for input on First Nations housing all provide natural points of engagement for the reforms AEON proposed in June. What has been missing is not the policy case — set out in full in AEON's submission (sub. 35) — but its connection to the Commission's own evaluative framework, which this submission has sought to provide.

AEON would welcome the opportunity to give further evidence to the Commission, including on the Bellingen planning framework, infrastructure challenges at Narara and Afterlee, and general information about other case studies referenced throughout this submission. We would also be pleased to facilitate introductions to communities, practitioners, local governments and First Nations organisations who are ready to engage with this reform agenda.

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