

Housing supply regulation

Submission on the Productivity Commission interim report

Home Address Australia Ltd

17 September 2026

The question HAA brings to this inquiry

Will these reforms produce more safe, suitable and lasting homes for people who cannot access the private market, and will we be able to tell?

About Home Address Australia

Home Address Australia Ltd (HAA) is an independent, lived-experience-led national charity. We work to prevent homelessness and improve the systems people encounter before, during and after homelessness through education, research, policy and advocacy. HAA is not a crisis accommodation provider or a technical planning adviser.

HAA recommends six practical additions to ensure housing supply reforms also benefit people who cannot secure or sustain housing in the private market.

HAA position

Planning reform may reduce delay and cost, but it cannot replace direct investment in social housing. HAA asks the final report to show what the reforms actually deliver for social housing.

Social housing stock stagnated in 2024–25. Public-housing waiting lists rose by nearly 21,000 households in 2025, and 41% of households on those waiting lists were classified as being in greatest need (NHSAC 2026, pp. 48–50).

Recommendations

- Measure completed and occupied social homes, not approvals alone.
- Include qualifying social-housing projects in streamlined pathways where state-level coordination is justified.
- Check that housing promised in return for a planning benefit is delivered and retained.
- Report the cost and result of any project-specific infrastructure concession for social housing.
- Separate modular construction from temporary occupancy and protect residents where occupancy is temporary.
- Use paid, voluntary and trauma-informed lived-experience participation when approval rules directly affect residents.

Recommendation 1. Measure completed social homes

Report reference	Interim report pp. 81–83 and 113–114; Reform Direction 3.4
HAA added recommendation	For relevant planning reforms, use existing data where possible to report social homes approved, started, completed and occupied, and the net increase in social housing.

The Commission proposes better reporting on approval times and processes. That will show whether approvals improve, but not whether social homes associated with the reforms are built and occupied. The report notes that many approved homes are not built because of barriers beyond the approval process (PC 2026, pp. 81–83, 113–114). The National Housing Supply and Affordability Council already reports social housing stock and some stages of delivery; HAA asks that relevant planning reforms be linked to their eventual housing outcomes (NHSAC 2026, pp. 48–49).

For relevant planning reforms, report social housing outcomes each year using existing data where possible.

- Report social homes approved, started, completed and occupied as separate figures.
- Show the net increase after demolitions, sales, conversions and replacement projects.
- Report where the homes are, who provides them, whether they are accessible and how long they are protected for social use.
- Record the public funding, land or concessions used to achieve the result.

Simple example: If 500 social homes are approved but only 200 are completed, the gross delivery is 200. If 100 older homes were demolished as part of the project, the net increase is 100.

This would prevent higher approval numbers from hiding little or no growth in housing for people in greatest need.

Recommendation 2. Include qualifying social housing in streamlined pathways

Report reference	Interim report pp. 80–82; Reform Directions 3.2–3.4; Information Request 3.4, p. 82
HAA added recommendation	Allow social-housing projects to use streamlined or state-led pathways when local need, public benefit and the need for coordination across agencies justify it. Project cost should not be the only test.

Information Request 3.4 asks which developments should be included in each assessment tier and what would be gained by including social and affordable housing. HAA recommends considering local need, public benefit and the need to coordinate agencies, utilities and funding bodies, rather than relying on project cost alone (PC 2026, pp. 80–82).

Eligibility should consider

- Demonstrated unmet social-housing need and the public benefit of the proposed homes.
- Whether coordinated state-level assessment is needed across agencies, utilities or funding bodies.
- Published criteria that do not rely on project value alone.
- Access for smaller regional projects where local need is established.

- No reduction in safety, accessibility or environmental protections.

Simple example: A 20-home regional social housing project may be extremely important locally but too small to meet a pathway based only on capital value. HAA wants the pathway to recognise local need and public benefit.

The aim is not automatic approval or a separate pathway for every social-housing project. It is access to an appropriate existing pathway where the need for coordinated assessment is clear, including for smaller regional projects that may fall below capital-value thresholds.

Recommendation 3. Check housing promised for planning benefits

Report reference	Interim report discussion of voluntary inclusionary zoning, pp. 56–57
HAA added recommendation	Where a developer receives a planning benefit in return for affordable or social housing, identify and legally secure the promised homes, then check their delivery and continued use. Confirm whether existing arrangements require these steps and recommend changes only where a gap is found.

The approval and reporting should identify

- The number, type, bedroom mix and location of the promised homes.
- How the housing commitment relates to the planning benefit.
- Who will own and manage the homes, who can live in them and how rent will be set.
- How long the housing must remain affordable or available for social use.
- The homes completed and occupied, whether the required use continues, and any action taken if a commitment is not met.

Simple example: If a project receives extra floor space in return for 15 affordable homes, reporting should show whether those homes were completed and remained affordable for the required period.

The NSW in-fill affordable housing scheme already requires the affordable portion to remain affordable and be managed by a registered community housing provider for at least 15 years. Applicable approvals also require a restriction on the property title and evidence of the management agreement. HAA cites this as an existing safeguard, and asks the final report to consider how delivery and continued use can be reported after approval (NSW DPHI 2026).

Recommendation 4. Report the cost and result of social-housing concessions

Report reference	Interim report discussion of developer contributions, pp. 101–103; Reform Directions 4.3 and 4.4, pp. 104–105
HAA added recommendation	If government waives, reduces or defers a contribution that would otherwise be payable to support social housing, report the ordinary amount, what was waived or deferred, how infrastructure will be funded and how many social homes are delivered.

The report should include

- The contribution payable under the ordinary rules and the amount waived, reduced or deferred.
- How the necessary infrastructure will be paid for, including during any deferral.
- The number of social homes the concession was intended to support, and the number completed and occupied.

Simple example: If a council reduces a contribution that a social housing project would otherwise be required to pay, it should publish the usual amount, the reduction and its reason. It should also explain any effect on planned infrastructure and report whether the social homes supported by the reduction were delivered.

Recommendation 5. Distinguish permanent modular housing from temporary accommodation

Report reference	Interim report discussion of modular construction and Box 3.2, pp. 70–72; Reform Direction 3.2, p. 80
HAA added recommendation	Make approval pathways distinguish between how a home is constructed and whether its approved use or occupancy is permanent or temporary.

The report's case study describes a permanent modular home whose approval took 13 months. The council initially processed it as a standard build; the separate pathway for off-site homes had been designed for manufactured-home and caravan parks and imposed extra requirements. Modular describes how a home is built; it does not determine whether the home or its occupancy is temporary (PC 2026, pp. 70–72).

- Use nationally consistent definitions for modular and prefabricated construction.
- Base the approval pathway on the proposed land use and duration of occupancy, not on off-site manufacture alone.
- Allow approved standard components and designs to be certified once and reused, while retaining site-specific checks for foundations, hazards, services and planning requirements.
- Apply equivalent safety, accessibility and liveability standards to permanent modular and conventionally built homes.
- Where residential use is time-limited, state the approved period, minimum facilities and notice requirements, and identify who is responsible for supporting residents into stable housing before the approval expires. This reduces the risk of residents returning to homelessness if a temporary site closes before suitable long-term housing is available.

Simple example: A factory-built home placed permanently on a serviced residential site should be assessed as a permanent home. A village approved for two years requires clear conditions governing the temporary use and what must occur before that approval ends.

The added point is not that modular housing needs weaker or stronger standards. It is that equivalent permanent homes should receive equivalent treatment, regardless of where their components were manufactured.

HAA supports simpler repeat approvals for modular construction while keeping site-specific safeguards and making any genuinely temporary residential use explicit.

Recommendation 6. Set a lived experience participation standard

Report reference	Interim report best-practice objective, pp. 24–26; discussion of early and targeted participation, pp. 80–81
HAA added recommendation	Where planning or approval rules for social or temporary housing directly affect residents' safety, accessibility, facilities, tenure or relocation, use structured lived-experience participation in designing those rules.

The report supports early and targeted third-party participation in state-significant assessments, but it does not specifically address lived-experience participation. HAA proposes a narrower resident-focused addition for rules governing social or temporary housing, where approval conditions may directly shape daily life and the pathway to stable housing.

- Pay people when their expertise or substantial time is requested.
- Make participation voluntary and obtain informed consent.
- Use trauma-informed, accessible and culturally safe processes.
- Connect participation to a real decision and report what changed as a result.
- Do not require people to disclose personal trauma to prove their expertise.
- Develop First Nations housing reforms through genuine partnership with communities, representative bodies and community-controlled organisations.

Simple example: Before approving a temporary housing model, residents and people with relevant lived experience could test proposed conditions concerning privacy, safety, transport, complaints, notice and relocation. The decision-maker would then report what changed as a result.

Reforms affecting Aboriginal and Torres Strait Islander housing should be developed with First Nations communities, representative bodies and community-controlled organisations, consistent with Closing the Gap Outcome 9.

Conclusion

HAA supports the Commission's broad direction. These recommendations seek to measure completed and net additional social housing; recognise smaller regional projects and coordination needs in pathway eligibility; check that housing promised for a planning benefit is delivered and retained; make social-housing concessions transparent; distinguish modular construction from temporary use; and involve residents where approval rules directly affect them.

The final report should make it possible to answer a basic question: did the reform produce more completed, safe and lasting homes for people who cannot access the private market?

References

Australian Government and Coalition of Peaks 2020, *National Agreement on Closing the Gap Outcome 9*, July, [Official source](#) (accessed 17 September 2026).

NHSAC (National Housing Supply and Affordability Council) 2026, *State of the Housing System 2026*, Australian Government, [Official source](#) (accessed 17 September 2026).

NSW DPHI (New South Wales Department of Planning, Housing and Infrastructure) 2026, *In-fill affordable housing*, [Official source](#) (accessed 17 September 2026).

PC (Productivity Commission) 2026, *Interim report - Housing supply regulation*, Canberra, July, [Official report](#) (accessed 17 September 2026).

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