
Post-interim submission to the Productivity Commission Housing Supply Regulation Inquiry

This submission is structured to respond directly to the Productivity Commission's relevant information requests. CASBE's recommendations are presented once under the relevant information request and then consolidated in a final summary.

CASBE post-interim submission

September 2026

1.0 Executive summary

CASBE welcomes the opportunity to provide a post-interim submission to the Productivity Commission's Housing Supply Regulation Inquiry. CASBE supports increasing well-located housing supply and agrees that regulation should be clear, proportionate, coordinated and efficient. CASBE recommends that the final report recognise durable housing supply as housing that is not only faster to approve, but also safe, resilient, affordable to operate, insurable and supported by infrastructure over its full life.

The Commission's Victorian case study highlights an important distinction between theoretical capacity, commercially feasible capacity and delivered housing. CASBE supports reforms that enable more housing in well-located areas, particularly near public transport, jobs and services. However, monitoring should distinguish between zoned capacity, commercially feasible capacity, approvals, commencements and completions, and should report these alongside infrastructure, environmental performance and resilience indicators.

CASBE's central concern is that reforms which relax land-use controls, expand codified or deemed-to-comply pathways, or constrain site-specific assessment may deliver short-term approval efficiencies while increasing long-term costs for households, councils, infrastructure systems, insurance markets and future governments. Put simply, the most expensive housing is housing that must be paid for twice: first through construction and purchase costs, and again through premature retrofit, repair, rebuilding, higher bills, unaffordable insurance or public recovery costs.

2.0 Summary of Recommendations

CASBE recommends that the Productivity Commission's final report:

1. Assess housing and planning reforms through a whole-of-life efficiency and productivity lens, distinguishing between reforms that remove unnecessary process and those that weaken standards that support resilience, liveability, environmental performance and long-term affordability. Reforms should be evaluated on their ability to deliver enduring community benefits and avoid shifting costs to households, councils, infrastructure providers, insurers, health systems and future governments.
2. Recognise distributed infrastructure and demand-management measures as part of infrastructure planning to support housing growth, resilience and long-term infrastructure efficiency.
3. Support housing growth in well-located areas while retaining safeguards for natural hazards, infrastructure capacity, urban greening, stormwater management and climate resilience.
4. Monitor reform outcomes across the full housing delivery pathway, distinguishing between zoned capacity, commercially feasible capacity, approvals, commencements and completions.
5. Support lot consolidation and coordinated redevelopment in established urban areas to optimise strategically located land and increase missing-middle housing supply.
6. Retain planning discretion where necessary to respond to site-specific risks, local conditions, emerging evidence and innovative design solutions.
7. Ensure fast-track and codified pathways include risk-based exclusions, assessment triggers or escalation mechanisms where evidence identifies natural hazard, environmental or infrastructure risks.
8. Evaluate reform success based on delivered, resilient and affordable housing outcomes, rather than approval volumes or theoretical capacity alone.
9. Review and build on the MAVlab Advancing AI Innovation in Local Government project to identify and scale appropriate AI use cases in statutory planning, particularly for administrative, information management and assessment-support functions, while maintaining human oversight of planning decisions.

3.0 CASBE's position

CASBE's 2026 position paper, *A resilient built environment for Victoria*¹, provides the policy basis for this submission. It calls for reforms that strengthen resilient homes and buildings, resilient subdivisions, and upfront climate risk information. These positions support CASBE's response to the Commission: housing supply reform should deliver more homes while ensuring those homes, neighbourhoods and infrastructure are designed for projected climate conditions, including heat, flood, stormwater pressure, bushfire and other natural hazards.

This is not an argument for slowing housing delivery. It is an argument for avoiding false economy. If planning systems approve housing that is poorly oriented, poorly shaded, poorly ventilated, exposed to foreseeable hazard risk, or dependent on later public infrastructure upgrades to remain habitable, the apparent upfront saving is likely to reappear as higher household bills, insurance pressures, council infrastructure costs, retrofit programs, disaster recovery expenditure and reduced housing durability.

Current AHURI research in progress² further supports this approach. AHURI's climate resilience research program is examining how to measure housing-system vulnerability and cost risk, identify who pays for resilience, and design transition pathways to a climate-resilient housing system. This evidence is directly relevant to the Commission's inquiry because it frames resilience as a housing-system, finance, insurance, planning and household affordability issue rather than a narrow building-design issue.

The emerging research agenda also highlights why minimum standards should not be weakened in the name of affordability. Where resilience is deferred, costs do not disappear; they are transferred to future households, renters, owners, governments, infrastructure providers and insurers. In this sense, the cheapest home at approval may become the most expensive home over its life if it requires avoidable retrofit, repair or replacement.

CASBE recommends that the Commission assess regulatory efficiency on a whole-of-life basis, recognising avoided retrofit, avoided disaster recovery, lower household operating costs, lower infrastructure demand and improved insurability as benefits of good regulation.

This submission responds directly to the interim report by identifying where CASBE supports the Commission's reform direction, where CASBE considers the interim analysis should be qualified, and what amendments should be made to the final report to ensure housing supply reforms improve long-term system efficiency as well as near-term delivery.

¹ [CASBE-POSITION-PAPER-2026-A-resilient-built-environment-for-Victoria.pdf](#)

² [Research in progress | AHURI](#)

4.0 Response to the Productivity Commission interim report by information request

This section responds directly to the Productivity Commission's relevant information requests. Under each information request, CASBE identifies the issue, explains the evidence or policy rationale, and sets out the recommendation CASBE asks the Commission to reflect in the final report.

CASBE's submission responds primarily to the information requests concerning best-practice principles for housing regulation; the role and impact of land-use controls and design requirements; approval delays and requirements; codified and deemed-to-comply pathways; strategic planning and technical studies; infrastructure coordination; monitoring; and implementation.

CASBE has framed its response against the four interim principles in Figure 2: adopting a build mindset, regulating only where necessary, coordinating housing with infrastructure, and keeping processes simple. CASBE supports the intent of clearer, faster and more coordinated regulation, but recommends that these principles be applied through a whole-of-life lens. A build mindset should not become a minimum-compliance mindset; regulating only where necessary should still include necessary climate, hazard, infrastructure and performance assessment; coordination with infrastructure should include distributed demand-management and resilience measures; and simpler processes should retain safeguards where material risks are present.

Best practice for housing regulatory systems

Information request 1.2 - Best Practice Interim Principles and overarching objective

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?*

The Commission presents the overarching objective:

A well-functioning housing and planning regulatory system that enables enough housing to meet people's needs, in the places where it delivers the greatest net benefit to the Australian community. It balances economic, social, cultural and environmental outcomes, and gives weight to the interests of both current and future residents.

The Commission presents four proposed Best Practice Interim Principles:

1. **Adopt a build mindset:** Only restrict the location and form of development where the benefits clearly outweigh the costs, including the impact on housing supply and affordability
2. **Only regulate where necessary:** Only regulate housing design features when there are clear market failures and allow households to choose and pay for other features they value
3. **Coordinate with infrastructure:** Plan housing and infrastructure together, so new development is supported by the infrastructure it needs, with clear and efficient rules for developer contributions
4. **Keep the process simple:** Make planning decisions timely, predictable and simple by setting clear decision pathways, limiting discretion where possible, and aligning with broader housing goals

CASBE response

CASBE supports the overarching objective for housing and planning system and reform.

In relation to the Best Practice Interim Principles, CASBE responds as follows:

Adopt a build mindset

CASBE submits that the final report should make clear that a build mindset is not the same as a minimum-compliance mindset. While unnecessary barriers to housing delivery should be removed, planning and regulatory systems must continue to support outcomes that contribute to long-term affordability, resilience, productivity and liveability. A build mindset should therefore prioritise the removal of unnecessary delay, duplication and uncertainty, rather than reducing the scope of planning considerations where those considerations deliver clear whole-of-life benefits for households, communities and governments.

Recommendation 1: Assess housing and planning reforms through a whole-of-life efficiency and productivity lens, distinguishing between reforms that remove unnecessary process and those that weaken standards that support resilience, liveability, environmental performance and long-term affordability. Reforms should be evaluated on their ability to deliver enduring community benefits and avoid shifting costs to households, councils, infrastructure providers, insurers, health systems and future governments.

Only regulate where necessary

CASBE agrees that regulation should be targeted, proportionate and focused on addressing genuine market failures. However, the key policy question is what is considered "necessary". While households should have choice, planning and building standards also play an important role in protecting vulnerable members of the community and addressing costs and risks that may not be reflected in individual purchasing decisions. An effective regulatory system should balance consumer choice, affordability and equity, ensuring essential protections are not left solely to market outcomes.

Recommendation 1: Assess housing and planning reforms through a whole-of-life efficiency and productivity lens, distinguishing between reforms that remove unnecessary process and those that weaken standards that support resilience, liveability, environmental performance and long-term affordability. Reforms should be evaluated on their ability to deliver enduring community benefits

and avoid shifting costs to households, councils, infrastructure providers, insurers, health systems and future governments.

Coordinate with infrastructure

CASBE supports better integration of housing and infrastructure planning and agrees that infrastructure funding and developer contribution arrangements should be clear, efficient and predictable. However, infrastructure coordination should extend beyond traditional network infrastructure and consider how development can reduce infrastructure demand and improve system resilience over time.

Recommendation 2: Recognise distributed infrastructure and demand-management measures as part of infrastructure planning to support housing growth, resilience and long-term infrastructure efficiency.

Keep the process simple

CASBE supports efforts to make planning decisions more timely, predictable and transparent. However, discretion remains an important feature of a well-functioning planning system. It is not simply a source of delay or regulatory burden; it provides the flexibility needed to respond to place-based risks, local conditions and innovative design solutions that cannot always be anticipated through prescriptive controls. For example, more than 150 completed flood studies in Victoria are yet to be translated into planning controls, limiting the ability of statutory decision-makers to fully consider known risks. Overly rigid decision pathways can therefore facilitate development in unsuitable locations, creating foreseeable future impacts and long-term disadvantage for affected communities.

Recommendation 3: Support housing growth in well-located areas while retaining safeguards for natural hazards, infrastructure capacity, urban greening, stormwater management and climate resilience.

Information request 2.1 - Design focused regulations

Do design-focused regulations (e.g. tree canopy requirements, apartment layout and storage) directly impact commercially feasible capacity?

CASBE response

Design-focused regulations may affect commercially feasible capacity in some circumstances, but their impacts should be considered alongside the value they deliver. For example, the Living Melbourne Priority Urban Greening Analysis found that every \$1 invested in urban vegetation generates around \$4 in benefits to the community, business and government³. Requirements relating to canopy cover, landscape outcomes and environmental performance can therefore reduce long-

³ https://livingmelbourne.org.au/wp-content/uploads/2022/04/Priority-Urban-Greening-Analysis_FINAL-14_06_2023.pdf

term costs and deliver substantial economic, health and climate resilience benefits. Assessment should focus on net community benefit and whole-of-life affordability, not development yield alone.

This is particularly important in relation to extreme heat. Buildings approved today will need to perform under hotter conditions over their full life. Extreme heat creates direct household costs through higher cooling demand and energy bills, and wider system costs through health impacts, peak electricity demand, emergency response and reduced wellbeing.

Extreme heat is widely recognised as Australia's deadliest natural hazard, causing more loss of life than bushfires, floods, cyclones and storms. Heatwaves also place significant pressure on health services, electricity networks and workforce productivity, with impacts borne across households, businesses and governments⁴.

Research by the University of Sydney found significant evidence that prolonged extreme heat exposure adversely affects the physical, mental and social health and wellbeing of public housing residents, while also imposing substantial cooling and energy costs⁵. Although undertaken in a public housing context, the findings reinforce the broader consequences of poor thermal performance, particularly for lower-income households and other vulnerable residents who are less able to absorb rising cooling costs or avoid exposure to extreme heat.

Evidence that a significant share of Australians face high heat risk, combined with research demonstrating the health, wellbeing and financial impacts of prolonged heat exposure, reinforces that poor thermal performance is not merely a comfort issue. It is a housing affordability, public health and economic productivity issue.

Information request 2.3— Land-use controls and well-located housing

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.

CASBE response

In CASBE's view, the key policy challenge is not simply to increase headline zoned capacity or accelerate approvals, but to ensure that additional capacity is feasible, well-designed, climate-resilient, infrastructure-efficient and likely to translate into completed homes.

The Commission's Victorian case study demonstrates why this distinction matters. Much of the theoretical capacity identified through activity centre reform may not be commercially feasible under current market conditions and therefore should not be treated as delivered supply. This aligns with

⁴ [Let's talk about the weather: injuries related to extreme weather, Extreme heat - Australian Institute of Health and Welfare](#)

⁵

Municipal Association of Victoria analysis identifying around 120,000 approved houses, townhouses and apartments in Victoria that had not yet commenced construction⁶.

Lot consolidation is an underutilised opportunity to increase housing supply in established suburbs and make better use of existing infrastructure. While streamlined and codified approval pathways can reduce approval times, there is a risk they also incentivise underdevelopment of well-located land. CASBE has observed examples under Victoria's 10-day VicSmart pathway for two dwellings on a lot, where sites have been developed to the minimum threshold enabled by the process rather than being consolidated for higher-yield outcomes.

A similar risk may emerge as the VicSmart pathway expands to allow up to four dwellings on a lot. While these reforms may increase housing delivery in the short term, they may also reduce incentives for lot consolidation and more comprehensive redevelopment, resulting in significant opportunity costs through the underutilisation of strategically located land. This is particularly important for addressing the "missing middle", where larger redevelopment sites can often deliver substantially greater housing capacity and better urban outcomes than fragmented small-lot development. Research such as Greening the Greyfields demonstrates the housing supply potential of coordinated redevelopment and site aggregation in established suburbs. [Greening the greyfields: how to renew our suburbs for more liveable, net-zero cities | Swinburne](#)

Recommendation 4: Monitor reform outcomes across the full housing delivery pathway, distinguishing between zoned capacity, commercially feasible capacity, approvals, commencements and completions.

Recommendation 5: Support lot consolidation and coordinated redevelopment in established urban areas to optimise strategically located land and increase missing-middle housing supply.

Information request 3.1 – Approval Delays and Planning Discretion

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

CASBE response

Delays in receiving approvals are not solely a function of the planning system. A common cause of delay is the submission of poor-quality or incomplete applications, which require further information, design changes or additional assessment. Efficient outcomes therefore depend on both well-functioning approval processes and well-prepared applications.

⁶ [planning-quick-facts.pdf](#)

Discretion is important where decisions must respond to site-specific risks, local conditions or natural hazards that cannot be fully addressed through standardised controls. It also supports innovation by allowing alternative solutions that achieve equal or better outcomes.

Victorian reforms highlight the need for safeguards in codified pathways. A key implementation issue in Victoria is the delay between the completion of technical studies and their incorporation into planning controls. CASBE understands that around 150 flood studies in Victoria have not yet been fully implemented through planning schemes. Recent residential reforms, including townhouse, low-rise and mid-rise codes, risk compounding this issue by preventing councils from considering natural hazard information unless the hazard is already mapped through a planning scheme overlay. In these circumstances, councils may hold credible evidence of flood risk but be unable to apply it within the prescribed assessment pathway.

Codified pathways should include exclusions or escalation mechanisms where evidence identifies natural hazard, environmental or infrastructure risks, including where planning controls have not yet been updated. This would maintain simple pathways for low-risk proposals while ensuring proportionate assessment where known risks exist.

Recommendation 6: Retain planning discretion where necessary to respond to site-specific risks, local conditions, emerging evidence and innovative design solutions.

Recommendation 7: Ensure fast-track and codified pathways include risk-based exclusions, assessment triggers or escalation mechanisms where evidence identifies natural hazard, environmental or infrastructure risks.

Recommendation 8: Evaluate reform success based on delivered, resilient and affordable housing outcomes, rather than approval volumes or theoretical capacity alone.

Information request 3.3 – Effectiveness of Planning Reforms

• *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?*

CASBE response

CASBE member council feedback on recent Clause 55 and fast-track reforms indicates that some streamlined pathways are producing implementation challenges. These include limited data collection on deemed-to-comply pathways, confusion and inconsistent interpretation of new standards, reduced use of site-specific assessment and negotiation, and uncertainty about whether increased application numbers are translating into better housing supply outcomes.

Feedback from Victorian local governments at a CASBE workshop in September 2025 identified the following case studies. They are included to show what should be monitored when assessing whether streamlined pathways increase effective housing supply, commercially feasible development and long-term system efficiency.

- **Passive design and operating costs:** one council reported applicants deliberately avoiding north-facing windows to avoid shading requirements, instead using south, east or west-facing windows. This was enabled by the removal of the north-facing living area requirement and weaker shading requirements. The result may reduce both short-term design quality and long-term affordability by increasing cooling costs and reducing passive thermal performance.
- **Reduced design outcomes:** one project was withdrawn and resubmitted with a modest increase from 28 to 33 dwellings, but with basement parking replaced by at-grade parking, increased building height, reduced landscaping and poorer internal pedestrian access. This illustrates why monitoring should assess development quality and infrastructure impacts, not only dwelling numbers or approval speed.
- **Underdevelopment and feasibility of well-located sites:** one council reported several Clause 55 applications that would previously have been considered underdevelopment. Examples included dual occupancies on sites that could have accommodated three or more dwellings, and single-storey dwellings on a consolidated site near a train station and activity centre where council would previously have advocated for low- to mid-rise apartments. This example aligns with the Commission's broader point that theoretical zoned capacity doesn't translate into commercially feasible capacity and effective delivery under current market conditions. Where codified pathways prevent consideration of strategic context, they may enable low-yield outcomes in locations where higher-density housing is appropriate and where the benefits of additional housing are likely to be high.
- **Loss of stormwater and water-sensitive urban design outcomes:** recent Clause 54 changes for single dwellings on lots under 300 square metres removed consideration of one council's local stormwater policy, which had required a water-sensitive urban design response. The council estimated this affected approximately 300 applications in 2024–25. As a result, rainwater tanks and raingardens are no longer required, leading to an estimated loss of 600,000 litres of rainwater storage and reduced stormwater filtering capacity. Council expects this to increase runoff, place greater pressure on drainage infrastructure, elevate flood risk, contribute to waterway degradation, increase potable water use and reduce vegetation-based cooling and biodiversity benefits.
- **Canopy standards that may not secure viable canopy:** one council reported that the tree canopy standard is difficult to apply because of inconsistent interpretation of deep soil rules and limited enforceable definitions. In some cases, canopy targets can be met using trees in poor condition, environmental weeds or constrained courtyards that are unlikely to support healthy long-term growth. This indicates that canopy outcomes should be monitored for viability and enforceability, not only nominal compliance.
- **Application numbers do not necessarily indicate better supply:** one council reported a 21 per cent increase in permit applications in 2024–25, but also reported that many applications were low-quality, referenced outdated standards and did not address new requirements such as tree canopy provisions on first submission. Despite the increase in applications, dwelling numbers fell by 38 per cent and processing times were unchanged. This reinforces the need to monitor dwelling yield, quality and implementation outcomes, not only application volumes.

Together, these examples show that the design of codified standards matters. Codification can reduce ambiguity and improve consistency, but only where standards are clear, enforceable and aligned with strategic objectives. Poorly designed pathways may reduce passive design, canopy quality, stormwater retention, infrastructure efficiency, urban design quality and appropriate density in well-located areas.

Monitoring should distinguish between application volumes, approvals, approved dwelling numbers, commercially feasible capacity, commencements and completions. It should also identify whether reforms support appropriate density in activity centres and public transport catchments or enable lower-yield development that reduces the long-term housing potential of strategically important sites.

Clause 55 and other codified pathways should be assessed against both approval certainty and housing outcomes, including housing delivery, resilience and the efficient use of strategically located land.

Recommendation 8: Evaluate reform success based on delivered, resilient and affordable housing outcomes, rather than approval volumes or theoretical capacity alone.

Information request 3.4 - Technology and Incentives

- *How effective has technology including AI been where it has been used to assist with approvals? How can it be better utilised?*
- *How can federal, state and territory governments incentivise councils to approve developments efficiently, and encourage those that are slow or are obstructing approval pathways?*

CASBE response

MAVlab has already undertaken significant work on this through the Advancing AI Innovation in Local Government project, in partnership with MAV Procurement and the City of Greater Dandenong. The project examined how AI can support statutory planning and produced practical resources including the Adopting AI for Planning in Victoria's Councils report, AI & Planning Use Cases, procurement guidance, and an AI procurement register for councils. The work found that AI is most effective when used to streamline administrative and assessment-support tasks, while maintaining human oversight for complex planning judgments and final decisions⁷.

The Municipal Association of Victoria's analysis identifying around 120,000 approved houses, townhouses and apartments in Victoria that had not yet commenced construction demonstrates that planning approvals are only one part of the housing delivery equation⁸.

Recommendation 9: Review and build on the MAVlab Advancing AI Innovation in Local Government project to identify and scale appropriate AI use cases in statutory planning, particularly for administrative, information management and assessment-support functions, while maintaining human oversight of planning decisions.

⁷ [Advancing AI Innovation in Local Government | MAV website](#)

⁸ https://www.mav.asn.au/__data/assets/pdf_file/0003/33393/planning-quick-facts.pdf

Information request 4.2 - Infrastructure Planning Reform Feedback

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?

CASBE response

CASBE supports infrastructure planning that considers both new infrastructure delivery and measures that reduce demand on existing networks. Site-based initiatives such as stormwater retention, water-sensitive urban design, urban greening, passive cooling and water efficiency can reduce pressure on water, drainage and energy infrastructure while improving housing resilience.

CASBE recommends recognising these distributed resilience measures as housing-enabling infrastructure, as they can help accommodate growth, improve liveability and reduce long-term costs for councils, utilities and residents.

Recommendation 2: Recognise distributed infrastructure and demand-management measures as part of infrastructure planning to support housing growth, resilience and long-term infrastructure efficiency.

Information request 5.1 - Infrastructure Planning Reform Feedback

How can the Australian Government best support state and territory and local governments to shift housing regulatory systems towards best practice?

Which of the reform directions will be relatively easy or hard to implement and why?

CASBE response

CASBE submits that housing regulatory reform should be assessed on a whole-of-system basis. Measures that reduce upfront assessment requirements may appear to lower regulatory burden, but where consideration of flood, heat, stormwater, canopy and building performance issues is reduced, costs are not eliminated, they are shifted to households, councils, infrastructure providers, insurers and future governments.

Climate resilience and environmental performance should be treated as productivity issues because they directly influence infrastructure demand, insurance costs, household expenses, public health outcomes and future adaptation expenditure.

Put simply, the most expensive housing is housing that has to be paid for twice. Resilient design, climate-risk assessment and robust performance standards should not be treated as optional extras. They are essential mechanisms for avoiding stranded assets, premature replacement, avoidable household hardship and future public expenditure.

The Australian Government should support best-practice reform by assessing regulatory burden over the life of housing and infrastructure, not solely at the point of approval, and ensuring that faster approval pathways do not weaken resilience, durability and long-term housing performance. As a

practical example, bushfire-resilient landscaping demonstrates how integrated regulatory settings can achieve multiple policy objectives, supporting biodiversity and urban greening outcomes while maintaining community safety through appropriate species selection, placement and fuel management. The final report could recognise bushfire-resilient landscaping as a practical example of integrated regulation. In bushfire-prone areas, the choice should not be framed as either supporting biodiversity and canopy or reducing vegetation for safety. Better guidance can require landscape responses that use low-flammability indigenous and native species, appropriate species placement, defensible space, canopy separation, fuel-load management, non-combustible or low-fuel materials near dwellings, maintenance requirements and resident information. This would help resolve competing policy objectives upfront and reduce conflict during individual approvals.

Recommendation 1: Assess housing and planning reforms through a whole-of-life efficiency and productivity lens, distinguishing between reforms that remove unnecessary process and those that weaken standards that support resilience, liveability, environmental performance and long-term affordability. Reforms should be evaluated on their ability to deliver enduring community benefits and avoid shifting costs to households, councils, infrastructure providers, insurers, health systems and future governments.

CASBE member councils include:

City of Ballarat	Hobsons Bay City Council	Mount Alexander Shire Council
Banyule City Council	Hume City Council	Murrindindi Shire Council
Bass Coast Shire Council	Indigo Shire Council	City of Port Phillip
Bayside City Council	City of Kingston	City of Stonnington
Boroondara City Council	Knox City Council	Strathbogie Shire Council
Brimbank City Council	Manningham City Council	Surf Coast Shire Council
Cardinia Shire Council	Maribyrnong City Council	Wangaratta Rural City Council
Casey City Council	Maroondah City Council	Warrnambool City Council
Darebin City Council	City of Melbourne	Whitehorse City Council
East Gippsland Shire Council	City of Melton	City of Whittlesea
Frankston City Council	Merri-bek City Council	City of Wodonga
City of Glen Eira	Mitchell Shire Council	Wyndham City Council
City of Greater Bendigo	City of Monash	City of Yarra
City of Greater Dandenong	City of Moonee Valley	Yarra Ranges Council
City of Greater Geelong	Mornington Peninsula Shire Council	

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