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Housing Supply regulation inquiry
Productivity Commission
GPO Box 1428
Canberra City ACT 2601

Subject: DRAFT Wingecarribee Shire Council Submission to the Housing supply regulation inquiry

Dear Commission Secretary

Wingecarribee Shire Council welcomes the opportunity to provide a submission to the Productivity Commissions' Inquiry into Housing supply regulation. This submission is provided on behalf of Council in response to the Inquiry's consideration of the

This submission has not yet been endorsed by Wingecarribee Shire Council but will be reported to the October 2026 meeting for Council endorsement. Council will then forward the endorsed version of the submission to the Commission. It is noted that the Productivity Commission has provided an extension to Council, until the 26th October 2026, to enable endorsement of the submission by the elected representatives.

As a regional local government area in New South Wales, Wingecarribee Shire has experienced sustained demand for additional and more diverse housing. However, the conversion of planned or zoned housing capacity into completed dwellings is constrained by water and sewer capacity, road and electricity infrastructure, servicing costs, development feasibility, workforce limitations, natural hazards and significant environmental considerations. These challenges are amplified by the Shire's dispersed, village-based settlement pattern and the need to protect the landscape, biodiversity, heritage and character values that underpin the identity and economy of the Southern Highlands.

Council recognises the importance of an efficient, transparent and coordinated housing regulatory system that supports the timely delivery of well-located housing. Council also recognises that increasing zoned capacity alone will not deliver new homes unless land is serviced, infrastructure-ready, environmentally suitable and commercially feasible. Effective reform must therefore integrate strategic land-use planning with infrastructure investment, utility servicing and streamlined approval processes.

We're with you

Council supports place-based and evidence-led reform that increases housing diversity and facilitates infill development in appropriate locations; strengthens coordination between councils, government agencies and utility providers; improves infrastructure funding and sequencing; and establishes clear, proportionate assessment pathways. Such reform must continue to protect environmental and heritage values, manage bushfire and flood risks, maintain local character and support the creation of safe, liveable, climate-resilient communities

The attached submission focuses on practical reforms that will help convert planned housing capacity into delivered homes. These include better measures of housing-ready land; forward funding for housing-enabling infrastructure, strategic planning, mapping and master planning; improved utility and agency coordination; streamlined referral and approval processes; and support for councils to maintain a robust evidence base for housing and infrastructure decisions. The submission also explains why blanket up-zoning or broad reductions in environmental, heritage and built-form protections would not provide an appropriate or durable response to the circumstances of regional communities such as Wingecarribee Shire.

Thank you for the opportunity to contribute to the Inquiry. Should the Commission require any further information, Council would be pleased to assist.

Yours sincerely,

Michael McCabe
Acting General Manager
Wingecarribee Shire Council



Wingecarribee Shire Council Submission the Productivity Commission Housing Supply Regulation Inquiry Interim Report

Executive Summary

Wingecarribee Shire Council welcomes the opportunity to provide feedback about the Productivity Commission's *Interim Report: Housing Supply Regulation* in which the Commission identifies land-use controls, approval processes and infrastructure coordination as primary regulatory influences on housing supply.

Council acknowledges the importance of those drivers of supply. In Wingecarribee, housing supply is also impacted by infrastructure capacity, environmental constraints, natural hazard management, workforce limitations and market feasibility rather than planning permissibility alone. Council's adopted Local Strategic Planning Statement (LSPS) and Local Housing Strategy establish the framework for accommodating housing growth through a combination of housing diversity, infill development, strategic release areas and infrastructure planning while protecting the environmental, landscape and heritage values that underpin the Southern Highlands' identity and economy.

This submission provides Councils' responses to information requests as identified in the Productivity Commissions Housing Supply Regulation Inquiry Interim Report.



Information request 1.1

- *How do housing regulatory systems, specifically, land-use controls, housing-enabling infrastructure and approval processes, affect Aboriginal and Torres Strait Islander people and communities' access to appropriate housing? Case studies and examples are encouraged.*
- *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?*

Council notes that housing regulatory systems can affect Aboriginal and Torres Strait Islander people and communities when land-use controls, infrastructure sequencing and approval processes do not adequately recognise cultural connection to Country, household composition, affordability, access to services, and the need for culturally appropriate housing. In Wingecarribee, the Local Strategic Planning Statement acknowledges the Gundungurra and Dharawal people as Traditional Custodians and establishes a place-based planning framework that seeks to balance housing, environmental, social and infrastructure needs. This framework should be strengthened by ensuring Aboriginal communities are engaged early in strategic planning, land release, infrastructure planning and local housing strategies.

Governments can improve housing regulatory systems by requiring strategic planning to work with First Nations communities to identify housing needs, culturally significant land, infrastructure barriers and opportunities for First Nations housing delivery before controls are applied or amended. In alignment with Closing the Gap Outcome 9, this should include genuine partnership with Aboriginal organisations, transparent infrastructure commitments, flexible planning pathways for Aboriginal housing providers, and monitoring of whether planning decisions are improving access to secure, appropriate and affordable housing.



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?*



Best practice regulatory systems for housing reform should not only consider housing supply as a measure of success. In regulating housing supply the planning system also needs to consider potential negative externalities which arise when planning and design is inadequate. Negative externalities can include impacts on biodiversity, amenity and liveability of places which also have economic impacts leading to longer term costs and less resilience.

Figure 1.2 of the report is a simplistic representation of a best practice regulatory system for housing. Principle 1 - 'Adopt a Build Mindset' intimates that in all places and all circumstances being able to develop land for housing should be a given unless the benefits of not developing outweigh the costs. Principle 2- 'Only regulate where necessary' suggests that housing design features should only be regulated where there is a market failure and that households should pay for other features they value.

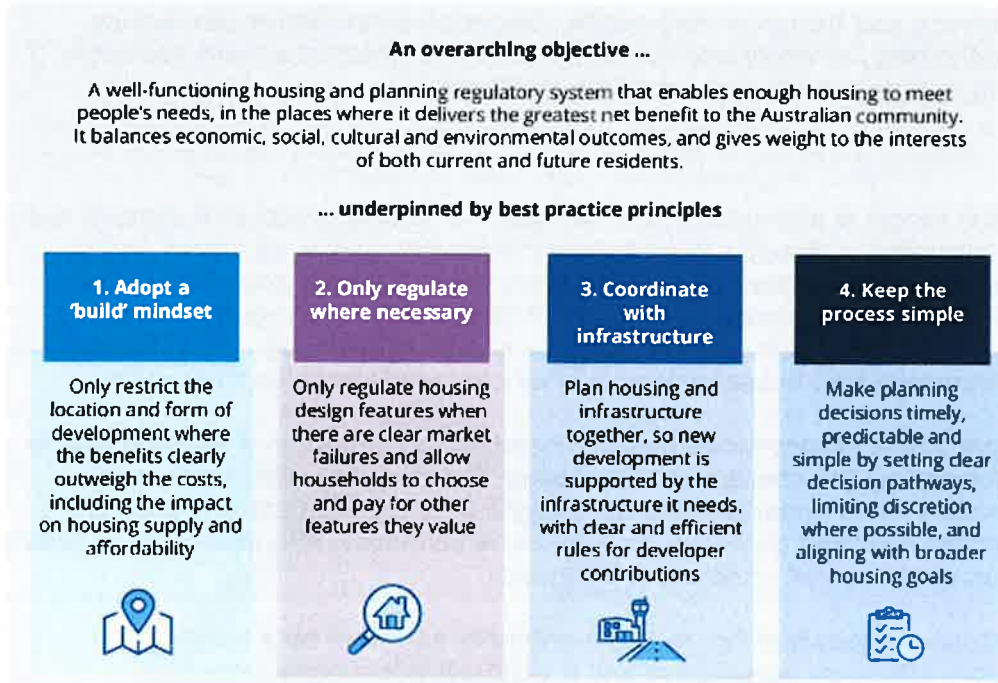
Neither Principle 1 or 2 acknowledge that the location and quantum of housing supply need to be informed by the characteristics of place including physical, social and economic constraints and opportunities. Excellence in mapping, data and analysis is necessary to make informed decisions, and, in some instances, it is necessary to reduce how much housing is allowed or how it is designed.

In summary, Council notes that figure 1.2 is primarily informed by a housing supply/regulatory efficiency perspective and it does not adequately reflect:

- The statutory objectives and duties contained in each state and territory's planning and environmental legislation
- Australia's Paris Agreement commitments and their implications for climate-resilient, low emissions urban development.
- Australia's international heritage obligations under the World Heritage Convention.
- Potentially relevant international biodiversity, wetlands and migratory-species obligations, except indirectly where they are translated into the NSW *Environmental Protection and Biodiversity Conservation Act 1999*.



Figure 1.2 A best practice regulatory system for housing



Information request 2.1

- Do design-focused regulations (e.g. tree canopy requirements, apartment layout and storage) directly impact commercially feasible capacity?
- What impact would reducing the coverage of heritage overlays have on housing supply?
- 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?
- Is there a need for further reforms to enable a greater supply of small secondary dwellings such as granny flats?
- Are there other land-use controls which significantly impact supply?
- 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)?

Council considers that the most significant constraints on housing supply are not individual design controls in isolation, but the cumulative effect of infrastructure capacity, servicing costs, environmental constraints, hazards, development feasibility and settlement structure.



The Wingecarribee Local Housing Strategy supports infill development and increased densities in appropriate locations, greater housing diversity, and new living areas where they can be planned and serviced. However, the Wingecarribee Local Strategic Planning Statement also recognises the Shire's significant environmental values, rural landscapes, biodiversity, bushfire and flood constraints, and the importance of retaining the distinctive character of towns and villages.

Design-focused controls such as tree canopy, landscaping, storage, solar access and apartment layout requirements may affect commercial feasibility at the margin, particularly on constrained sites. However, reducing design quality is not an appropriate or durable response to housing supply challenges. Poorly designed housing areas can create longer-term costs through heat, reduced liveability, infrastructure stress, loss of amenity and reduced resilience. Controls should be clear, proportionate and capable of being assessed efficiently, but they should continue to protect liveability, climate resilience and neighbourhood character.

Council does not support broad reductions in heritage protection as a housing supply measure. Heritage controls should be reviewed where they are outdated, poorly mapped or not supported by contemporary evidence, but changes should be based on strategic heritage studies rather than a presumption that heritage is a barrier. In Wingecarribee, heritage, character and landscape values are part of the Shire's identity and tourism economy, and housing reform should manage these values alongside housing need. Alternative dwelling types should be enabled through targeted amendments that support dual occupancies, secondary dwellings, manor houses, terraces, townhouses, shop-top housing and seniors housing in locations close to centres, services and infrastructure. These reforms are most likely to increase feasible supply where they are paired with infrastructure planning, clear design requirements and local character controls.

Secondary dwellings can provide additional flexibility and lower-cost rental options, but further reform should focus on practical barriers such as servicing, parking, bushfire and wastewater constraints rather than removing all local assessment.



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?*

Council agrees with the Interim Report's observation that zoned land does not automatically translate into housing supply. Wingecarribee's challenge, like many other rural areas is not necessarily a shortage of residentially zoned land, but the conversion of potential housing capacity into completed dwellings. The primary constraints to conversion of capacity to completions are:

- sewer and water capacity
- road upgrades
- electricity infrastructure



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- development feasibility
 - servicing costs in greenfield areas
 - bushfire constraints
 - flood constraints
 - biodiversity constraints.

It is noted that conservation of culturally significant places, biodiversity, bushfire and flood characteristics are, in some instances characteristics of place that do not support conversion to urban areas.

Council supports the Commission's proposal that governments develop measures distinguishing between:

- zoned capacity;
- serviced capacity;
- infrastructure-ready land; and
- commercially feasible capacity.

Such reporting would provide a more accurate assessment of housing delivery capacity than simple estimates of zoned land.

Council supports:

- housing diversity in appropriate locations;
- low and medium density infill around centres;
- shop-top housing;
- greater housing choice within existing urban areas.

However, Council does not support blanket national requirements to permit three-storey development across all residential land regardless of context. The Commission's proposed reform direction should explicitly recognise environmental hazards, infrastructure limitations, heritage values, landscape character and settlement structure. In Wingecarribee, a village-based settlement pattern and significant environmental constraints require a targeted and evidence-based approach rather than universal up-zoning.



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?*



Council's adopted LSPS and Local Housing Strategy provide the primary evidence base for land-use reform in Wingecarribee. These strategies identify opportunities for increased housing diversity, infill development, shop-top housing and targeted increases in density in locations that are supported by infrastructure and do not present unacceptable environmental or hazard constraints.

Reforms to zoning, minimum lot sizes and development standards should be informed by local evidence and infrastructure capacity. While such reforms may increase zoned capacity, they will only increase housing delivery where land is serviced, feasible to develop and capable of supporting growth.

Council supports affordable housing mechanisms, including inclusionary zoning, where they are supported by feasibility testing, transparent contribution arrangements and a clear evidence base. Affordable housing outcomes are likely to be most effective when combined with infrastructure investment, government funding programs and support for community housing providers.



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?*

Council supports reforms that improve certainty, transparency and efficiency in development assessment and Council agrees with the Productivity Commission that approval delays often arise from:

- incomplete applications;
- repeated requests for information;
- external referral processes;
- infrastructure servicing issues;
- conflicting agency requirements.

Discretion is useful where site constraints, environmental risks, heritage impacts or infrastructure limitations require professional judgement. It is less useful where controls are ambiguous, subjective or duplicate matters already resolved through strategic planning. Council supports clearer controls, better lodgement requirements and earlier agency input so that discretion is focused on genuinely complex matters rather than routine residential development.

Third-party appeal and notification processes should preserve community participation while reducing avoidable delay. This can be achieved through clearer strategic planning, early engagement before rezoning or precinct planning, proportionate notification requirements, and appeal rights that are focused on developments with material environmental, heritage, amenity or infrastructure impacts.



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?
- 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?

In Wingecarribee, the most onerous approval requirements are generally those associated with complex servicing, environmental and hazard constraints rather than standard planning assessment. These include water and sewer servicing advice, traffic and road upgrade requirements, bushfire assessment, flood studies, biodiversity assessment, Aboriginal cultural heritage due diligence, stormwater management, contamination investigations and external agency referrals. These requirements should not simply be removed, because they manage real risks, but they could be better coordinated, scoped earlier and supported by clearer guidance.

Subdivision approval processes could be improved by requiring earlier infrastructure and agency coordination, standardising engineering requirements, improving digital lodgement and referral systems, and aligning subdivision staging with infrastructure delivery plans. State agencies and utility providers should be involved at the strategic planning and rezoning stage so that issues are not deferred to subdivision certificate or construction certificate stages.



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?

Council considers that improving coordination of the approvals process is at least as important as reducing the number of approval requirements. Many approval requirements address legitimate public interest matters, including servicing, safety, biodiversity, heritage, stormwater and traffic impacts.

However, the more significant issues include sequencing and duplication of referrals, late referral comments and unclear agency expectations. Coordination bodies, including Council, work best when they have authority to resolve interagency issues, agreed timeframes, transparent escalation pathways and the ability to link approvals with infrastructure delivery.



Planning reforms that increase certainty can be useful where they produce clear, measurable and locally appropriate standards. However, standardised codes should not override the need for place-based planning in areas with significant hazards, biodiversity, heritage and landscape constraints.

The best approach is a tiered system in which low-risk development is assessed through clearer code pathways, while complex proposals remain subject to merit assessment.



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?*

Council supports Reform Direction 3.4. that strategic planning should resolve major land-use conflicts and infrastructure requirements upfront rather than through individual rezoning (known as planning proposals in NSW) and development applications. This principle is already embedded in the NSW *Environmental Planning and Assessment Act 1979*, specifically cl 3.9 'Local strategic planning statements of councils.' In NSW, a Local Strategic Planning Statement (LSPS) must be prepared, made and reviewed at least every 7 years. The LSPS must include or identify the basis for strategic planning having regard to economic, social and environmental matters, the planning priorities that are consistent with any strategic plan applying to the area and any applicable community strategic plan, the actions required for achieving those planning priorities.

Wingecarribee Council, like all other NSW Councils has an adopted Local Strategic Planning Statement which identifies:

- preferred growth locations;
- infrastructure dependencies;
- housing targets;
- environmental constraints;
- servicing requirements.



and informed the preparation of the adopted Wingecarribee Local Housing Strategy. The legislated process remains a useful and important strategic planning process which should be retained and resourced. Refinement of the processes including the issue of improved guidance would also assist council and the NSW state government in ensuring an LSPS and Local Housing Strategy are evidenced based and informed by stakeholder engagement.

Discretion will continue to be necessary where more detailed investigation reveals that a development involves:

- flood risk;
- bushfire risk;
- heritage items;
- biodiversity impacts;
- landscapes of high scenic value;
- complex site constraints.

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?*

Council supports reforms that bring utility providers, state agencies and councils into housing and infrastructure planning at the earliest possible stage. In Wingecarribee, the timing of water, sewer, road and electricity infrastructure is central to converting zoned or strategically identified land into completed housing. Misalignment can occur where local strategic planning identifies growth areas, but infrastructure providers do not have matching funding, delivery programs or statutory obligations to service those areas within the same timeframe.

Reforms should include shared housing and infrastructure sequencing plans, transparent capacity mapping, earlier utility advice at rezoning stage, clear service level expectations, and funding programs that enable councils and providers to bring forward trunk infrastructure. Infrastructure planning should distinguish land that is zoned from land that is serviced, funded and capable of timely connection.

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?*

Council supports the Commission's focus on infrastructure planning as a key housing supply issue. As most new housing in Wingecarribee is delivered in a greenfield setting housing delivery frequently depends on:

- water and sewer upgrades
- road network capacity



- *utility connections*
- *state agency investment decisions.*

Accordingly, Council strongly supports:

- *integrated housing and infrastructure planning*
- *early utility provider involvement*
- *long-term infrastructure sequencing plans*
- *infrastructure funding certainty.*

Council supports the Commission's focus on infrastructure planning as a key determinant of housing delivery. The proposed reform directions would improve housing outcomes by better aligning land-use planning, utility servicing and infrastructure investment. The primary implementation challenge is ensuring that infrastructure funding, utility provider programs and housing growth objectives are coordinated and sequenced to support timely development.



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?*

Governments can balance feasibility and upfront infrastructure needs by:

- combining later-stage developer contribution payments with public sector forward funding, infrastructure loan facilities, grants, works-in-kind agreements and reimbursement mechanisms. Deferring contributions may assist project cashflow, but councils still require funding to acquire land, design works and deliver infrastructure before or alongside development. The timing of contributions should therefore be supported by bridging finance or state and Commonwealth infrastructure programs.
- assisting regional areas in the delivery of major infrastructure particularly where early stages of development trigger major upgrades that also benefit later stages or other landowners. Reforms could include contribution frameworks with transparent apportionment, pooling of contributions, special infrastructure funding where appropriate, and mechanisms for reimbursement when one developer delivers infrastructure that benefits a broader catchment.



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?*



Council supports the principle that developer contributions should have a clear nexus to development and be transparent and predictable. However, Council does not support reforms that reduce councils' ability to recover the reasonable costs of infrastructure required to service growth.

For regional councils:

- infrastructure costs are often higher than urban areas on a per-dwelling basis.
- growth can require substantial upgrades to existing infrastructure.
- local government revenue sources are even more limited than for urban councils.

In that light Council supports:

- earlier infrastructure funding assistance.
- state and Commonwealth infrastructure partnerships.
- mechanisms that address first-mover disadvantages.
- infrastructure financing programs that assist councils to deliver infrastructure in advance of development.



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?*

Council supports an active role for the Australian Government by:

- providing thought leadership on the quality of places Australia is seeking to create, so housing supply reform is not framed only around dwelling numbers but also around liveability, resilience and long-term community wellbeing. The Australian Government can help set a shared expectation that new housing should contribute to connected, climate-responsive and environmentally sensitive places that support access to services, jobs and economic opportunity, education, social infrastructure, open space, transport choices and community connection.
- the early funding of planning, design and delivery of housing-enabling infrastructure, which would be particularly useful where local councils are expected to accommodate growth but do not have the revenue base to forward fund major infrastructure. Federal level support should prioritise work and infrastructure that unlocks serviced and feasible housing capacity, including water, sewer, roads, open space and community infrastructure.
- improving availability of data and mapping including constraints mapping, infrastructure capacity analysis, housing needs assessment, Aboriginal housing engagement, biodiversity and hazard mapping, and master planning for growth areas to confirm where, when and what housing can be delivered.
- helping to build collaboration across all levels of government and jurisdictions to improve the capacity of practitioners and decision makers to deliver better outcomes at the community level, including improved housing supply. The Building Better Cities Program, established by the Australian Government in the early 1990s, provides a useful precedent for this role. It sought to improve the efficiency, equity and sustainability of Australian cities by linking Commonwealth funding with state and territory action on urban renewal, housing, transport,

infrastructure, social justice, environmental improvement and more liveable urban environments. (Examples of projects progressed under the program often cited as having had positive outcomes include:

- the urban renewal of Pyrmont and Ultimo in Sydney, where former industrial land was transformed into a mixed-use precinct with housing, jobs, public open space, foreshore access, light rail and community facilities,
- the Honeysuckle redevelopment in Newcastle,
- the East Perth redevelopment and
- other integrated renewal projects that combined infrastructure investment with housing, employment and public-domain improvements.

A contemporary equivalent program could support housing supply by funding integrated place-based strategies that bring together housing, infrastructure, climate resilience, environmental management and community outcomes. The Building Better Cities Program (1991–96) recognised that achieving better urban outcomes required not only investment in infrastructure but also stronger institutional capability and planning practice. While professional development was not a discrete program objective, its explicit focus on institutional reform, demonstration, innovation, integrated planning and improved coordination between levels of government had an important capacity-building function, strengthening the ability of agencies and urban professionals to plan and deliver more efficient, equitable, sustainable and liveable cities.



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?*

Council considers that the easiest reforms to implement are those that improve the evidence base and coordination of housing delivery without requiring immediate changes to local planning controls.

Quick wins include:

- consistent reporting of zoned, serviced, infrastructure-ready and commercially feasible housing capacity,
- earlier referral advice from state agencies and utilities,
- standardised lodgement requirements,
- improved digital tracking of assessment timeframes, and
- targeted support for councils to update housing strategies, infrastructure plans and constraints mapping.



Council notes that there are important co-dependencies across the reform directions. Land-use reform should be sequenced after, or at least alongside, infrastructure capacity planning, housing needs analysis, constraints mapping and engagement with Aboriginal communities. Developer contribution reform should be linked to infrastructure sequencing and forward funding so that councils can deliver enabling works before or alongside development. Approval pathway reform should follow strategic planning work that resolves key land-use conflicts, infrastructure requirements and local character expectations upfront.

The Australian Government can best support state, territory and local governments by funding the evidence base and infrastructure needed to make housing supply reforms deliverable. This includes support for local housing strategy updates, infrastructure capacity analysis, biodiversity and hazard mapping, master planning, digital assessment systems, utility coordination and housing-enabling infrastructure. Funding programs should reward infrastructure-ready and feasible housing capacity, not simply additional zoned capacity, and should recognise the limited revenue base and higher per-dwelling infrastructure costs faced by regional councils.

In summary, Council submits that the Productivity Commission should prioritise the following reforms:

High Priority

1. strategic planning linked to infrastructure and infrastructure sequencing.
2. forward funding Councils to plan, design and deliver a robust evidence base including mapping and masterplans and infrastructure.
3. streamlined referral processes.
4. infrastructure coordination and sequencing.
5. utility connection reform.
6. improved evidence based (mapping and data) to inform strategic planning
7. developer contribution reforms which make funds more readily available for land acquisition and infrastructure delivery.
8. improved measures to track housing-ready land.

Medium Priority

9. expanded code-based pathways for low-risk development.
10. digital assessment systems.
11. improved planning performance reporting.

Council considers that housing supply reform must remain place-based and evidence-led. Environmental protection, natural hazard management, infrastructure capacity and community liveability are not barriers to housing supply. They are essential considerations that ensure housing growth occurs in locations that are safe, sustainable and capable of long-term servicing. As such, Council does not support:

- blanket up-zoning.
- broad removal of local built-form controls.
- significant reductions in heritage or environmental protections without robust local analysis.